



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

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Biodiversity Management Plan

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Revision Tracking

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1 INTRODUCTION

This document is the Biodiversity Management Plan (BMP) for the G3 Gaziantep 1-1, 2-1, 3-1 Solar Power Plants Project ("the Project"). This BMP sets out the requirements for the management of environmental, community and occupational health and safety particularly concerning biodiversity (BIO) management during the implementation of the Project.

The Plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this HMMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors. G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm neighborhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This BMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and all employees. The Client is the main responsible for the implementation of this Plan. The Client is the main responsible for the implementation of this Plan. Contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client. This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed under Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The overall objective of the Project is to ensure:

- Impacts on fauna and flora species as a result of construction and Operation and Maintenance (O&M) activities are minimised;
- No Net Loss and preferably a Net Gain for Natural Habitats, whenever possible;
- Net Gain for Critical Habitats;
- Ecological processes are maintained and are not disrupted.

Achieving these objectives requires that the mitigation hierarchy is exercised to ensure Project-related impacts are managed through taking appropriate avoidance, minimization and restoration measures before biodiversity offsets are considered to compensate for significant residual impacts.

The objective of this Plan is to define:

- the scope and the applicable interphases for the management of BIO during all project activities;

- project BIO-based standards in terms of components;
- responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan;
- training requirements, monitoring measures and Key Performance Indicators;
- the project-specific BIO related risks and hazards;
- the measures to manage components and monitor Project performance.

1.3. Abbreviations

Abbreviation	Definition
Aol	Area Of Influence
BIO	Biodiversity
BMP	Biodiversity Management Plan
CH	Critical Habitat
CHS	Community Health & Safety
Client	Kalyon Enerji Yatırımları A.Ş.
CR	Critically Endangered
DC	Direct Current
DD	Data Deficient
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EEC	European Economic Community
EHS	Environment, Health and Safety
EN	Endangered
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
EPFI	Equator Principles Financial Institutions
E&S standards	Environmental and Social Standards
EPs	Equator Principles
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System

Abbreviation	Definition
EU	European Union
GIIP	Good International Industry Practice
GNS	Guidance Notes
ha	hectares
HR	Human Resources
H&S	Health and Safety
IBA	Important Bird and Biodiversity Area
IFC	International Finance Corporation
IPA	Important Plant Area
IUCN	International Union for the Conservation of Nature
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KBA	Key Biodiversity Area
km	Kilometers
KPI	Key Performance Indicator
kV	KiloVolts
MP	Management Plan
MWe	Megawatt electric
MWp	Megawatt peak
NT	Near Threatened
OECD	Organization for Economic Co-operation and Development
O&M	Operation and Maintenance
OHS	Occupational Health & Safety
OHTL	Over Head Transmission Lines
Project	G4 Bor-3 Solar Power Plant Project
PR6	Performance Requirement 6
PS6	Performance Standard 6
PV	Photovoltaic
SCADA	Supervisory Control and Data Acquisition
SPP	Solar Power Plant

Abbreviation	Definition
VU	Vulnerable
TBT	Toolbox Talks

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Environmental Law (Law Number: 2872)
- Expropriation Law (Law No: 2942)
- Forestry Law (Law No: 6831)
- Groundwater Law (Law No: 167)
- Law on National Parks (Law Number: 2873)
- Law on Conservation of Cultural and Natural Assets (Law No: 2863)
- Law on Soil Conservation and Land Use (Law No: 5403)
- Municipality Law (Law No: 5393)

2.2 International Requirements

The Project is required to meet requirements of international lending financing institutions, specifically:

- The International Finance Corporation (IFC) Performance Standards (PS) 2012 and relevant Guidance Notes, in particular:
 - IFC PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources;
 - IFC Guidance Notes 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources (2019);
- European Bank for Reconstruction and Development (EBRD) Performance Requirements (PR) (2019): and

relevant Guidance Notes, in particular

- EBRD PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- World Bank Group Environment, Health and Safety (EHS) Guidelines (General and Industry Sector):
 - General EHS Guidelines (April 2007) which cover four areas of GIIP (Good International Industry Practice): Environmental; Occupational Health & Safety (OHS); Community Health & Safety (CHS); Construction and decommissioning;
 - EHS Guidelines for Electric Power Transmission and Distribution (April 2007);
- International conventions and agreements for the protection and conservation of the environment including:
 - 1997/11/ EC: Council Directive of 3 March 1997 amending and supplementing the Directive of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment;
 - 2001/42/ EC: Council Directive of 27 June 2001 on the assessment of the effects of certain plans and programs on the environment;
 - Directive 2008/1/EC of the European Parliament and of the Council of 15 January 2008 on integrated pollution prevention and control;
 - EEC Water Framework Directive and Directive 1999/30/EC relating to limit values for sulfur dioxide, nitrogen dioxide and nitrogen oxides, suspended particles and lead in ambient air;
 - United Nations Framework Convention on Climate Change (New York, 1992);
 - Convention on Biological Diversity;
 - Convention for the Protection of the European Wildlife and Natural Habitats (Bern, 1972);
 - Water Framework Directive 2000/60/EC;
 - Convention on the Protection of Migratory Species of Wild Animals (Bonn, 1979);
 - EEC Directive on Birds and Habitats. Council Directive 79/409/EEC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna;
 - Directive on Environmental Quality Standards in the Water Policy 2008/105/EC.
 - Good International Industry Practice (GIIP).

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have BIO management implications, including:

- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)

- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN- G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN- G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN- G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labour Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATONAL STRUCTURE

3.1 Project Implementation Organization Chart

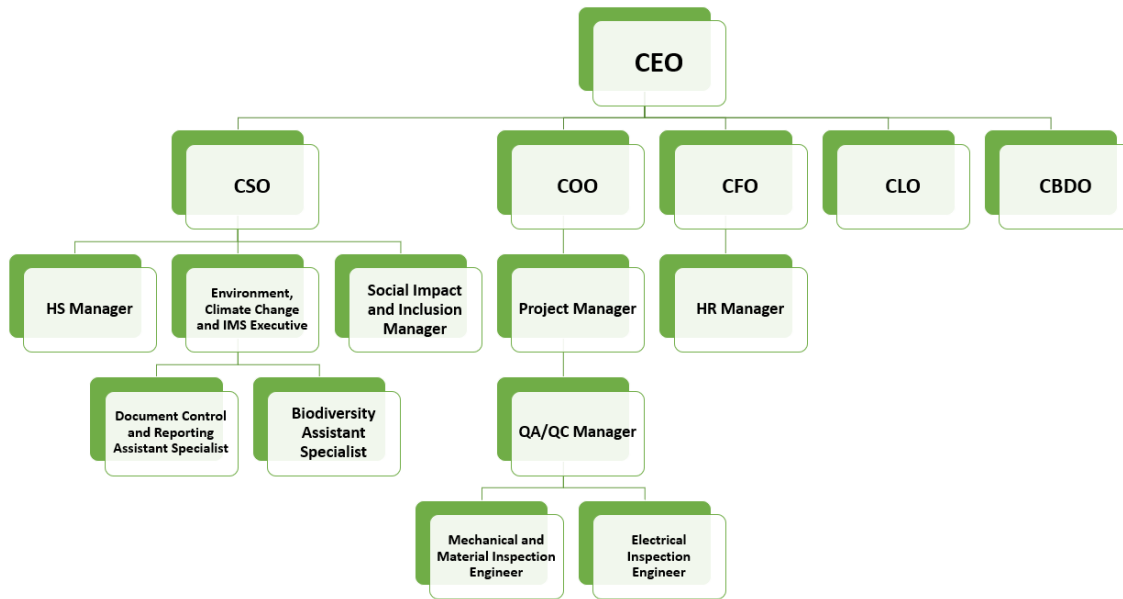


Figure 1: Organization Structure of the Kalyon Enerji

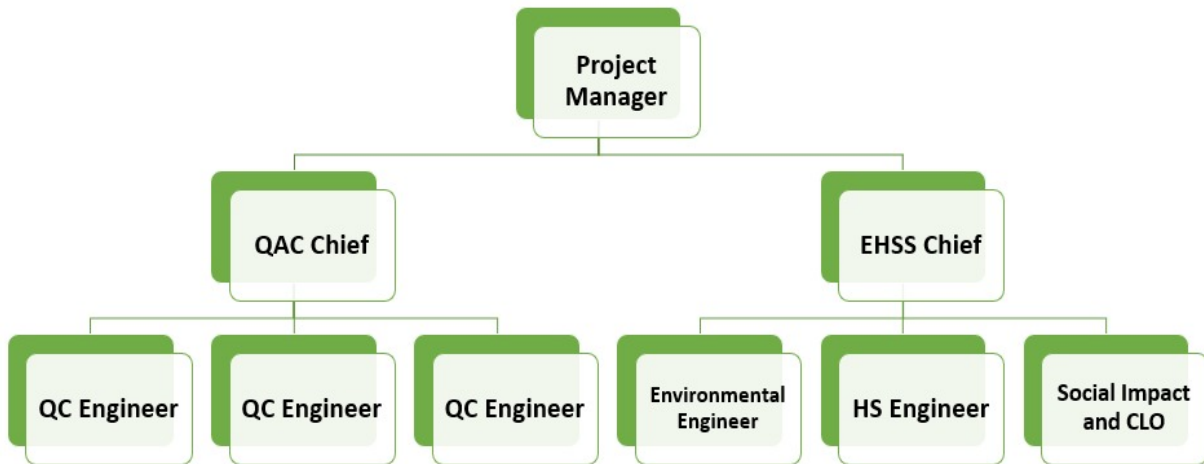


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organisational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Kalyon Enerji Environment, Climate Change, and IMS Executive Monitor the E&S performance of the Plan at the Project level and ensure environmental and biodiversity practices are implemented by EPC and its sub-contractors.
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is complaint with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Monitor the E&S performance of the Plan at the Project level and ensure environmental and biodiversity practices are implemented by EPC and its sub-contractors.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> Prepare, manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits. Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. Ensure Stakeholder Engagement and GRM are understood by all employees.

Roles	Responsibilities
	<ul style="list-style-type: none"> Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>Kalyon Enerji Biodiversity Assistant Specialist</i>	<ul style="list-style-type: none"> Kalyon internal Specialist for biodiversity issues. Organization and management of monitoring surveys Organization and management of rehabilitation/restoration activities. Organization and management of translocation activities for fauna and flora species. Keep the reporting of all unexpected impacts on biodiversity and natural habitats. Keep the reporting of all monitoring surveys and/or encounters with wildlife. Collaborate with Environmental Engineer and Biodiversity Consultant(s) for the full implementation of mitigation and monitoring measures.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan during construction. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Chief</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and other occasions as required by legislation. Organize the training related to this procedure for the personnel who are responsible for this Plan. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>EPC Environmental Engineer</i>	<ul style="list-style-type: none"> Ensure all mitigation measures and management controls are implemented properly. Control incoming and outgoing material and machinery. Control that impacts on biodiversity and habitats are minimized. Organization of the translocation activities for fauna and flora species. Ensure the restriction of vehicular traffic to the existing roads and keep records of all the encounters with wildlife species. Ensure the implementation of speed limits and animal crossing signs. Ensure the implementation of fencing gaps.

Roles	Responsibilities
	<ul style="list-style-type: none"> Ensure that night works in proximity to natural habitats will be avoided. Keep the reporting of all unexpected impacts on environment. Organization of rehabilitation/restoration activities.
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the Camp Manager Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related training. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the training. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Support to effective implementation of this plan. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence

4 STUDY AREA

The Biodiversity Area of Influence (AoI), defined as the areas beyond which no detectable effects on biodiversity are expected, was designed as a 1 km buffer from the borders of the Project area. The AoI includes an appropriate area to support the design of the present BMP. The Project AoI is illustrated in **Hata! Başvuru kaynağı bulunamadı.** and it covers an area of about 1,236.52 ha.

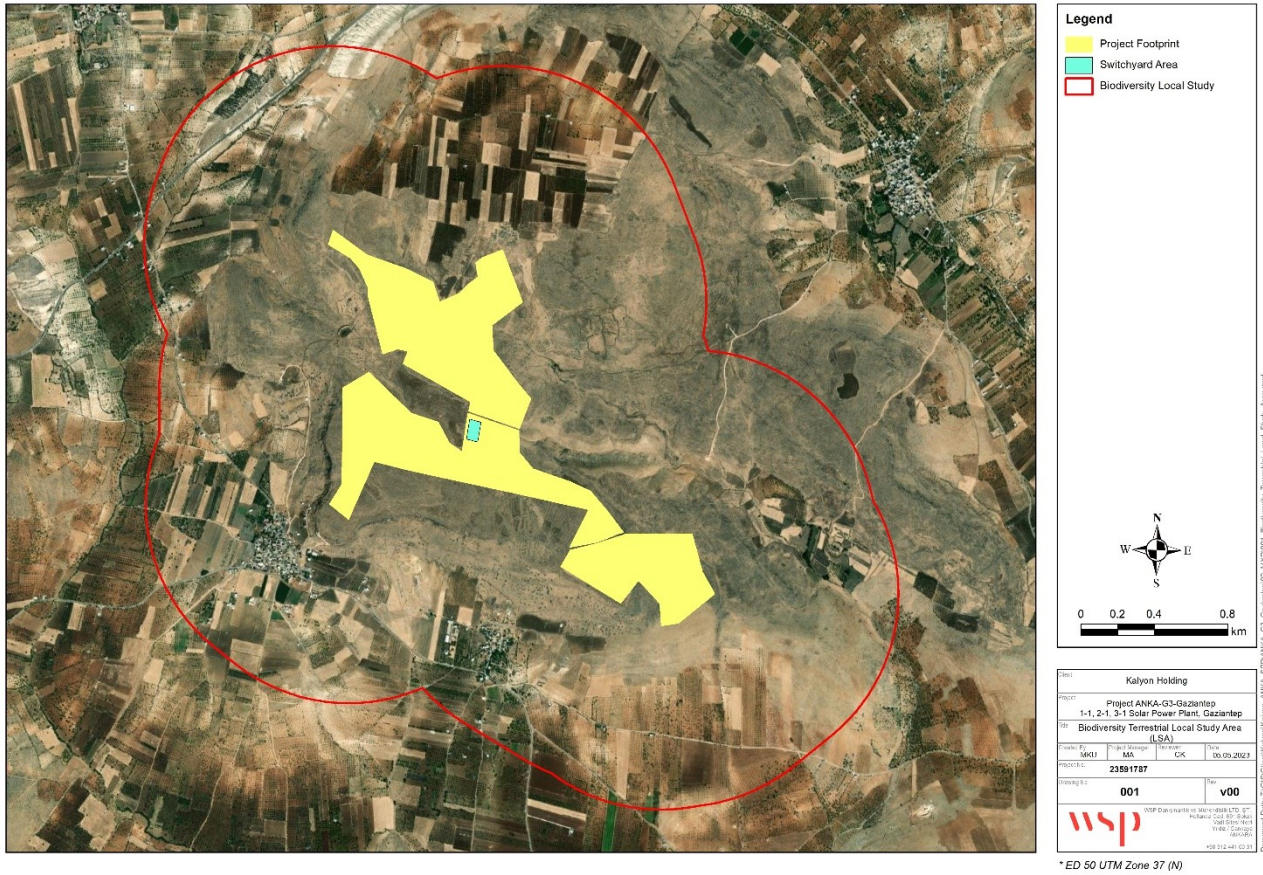


Figure 3: Project Footprint and Biodiversity Area of Influence (AoI)

5 OVERVIEW OF BIODIVERSITY BASELINE CONDITIONS

This chapter presents an overview of the baseline conditions, including the results of field studies conducted in May 2023. The complete description of the methodology and the results of the field studies already performed is available in detail in the Biodiversity Baseline Report (see the ESIA report).

The Project is located within the terrestrial ecoregion “Eastern Mediterranean conifer-sclerophyllous-broadleaf forests – PA1207” (Olson, 2001¹), which is part of the broader biome category “Mediterranean Forests, woodlands and scrubs” (Hata! Başvuru kaynağı bulunamadı.).

The Project AoI is not located within the boundaries of any legally protected area. An internationally recognized area of importance for biodiversity situated at 17 km from the AoI is Yeşilce Key Biodiversity Area (KBA) and Important Bird and Biodiversity Area (IBA). Burç and Dülükbaşa Nature Parks are also located northeastern of the AoI, at about 13 km and 18 km respectively. However, these areas were created for recreational purposes, not for the protection of biodiversity, and include many artificial facilities such as a safari zoo, an adventure park, and various restaurants and facilities.

¹ Olson D., Dinerstein E., Wikramanayake E., Burgess N., Powell G., Underwood E., D'amico J., Itoua I., Strand H., Morrison J., Loucks C., Allnutt T., Ricketts T., Kura Y., Lamoreux J., Wettengel W., Hedao P., Kassem K. (2001). Terrestrial Ecoregions of the World: A New Map of Life on Earth. BioScience. 51. 933-938. 10.1641/0006-3568(2001)051[0933:TEOTWA]2.0.CO;2.

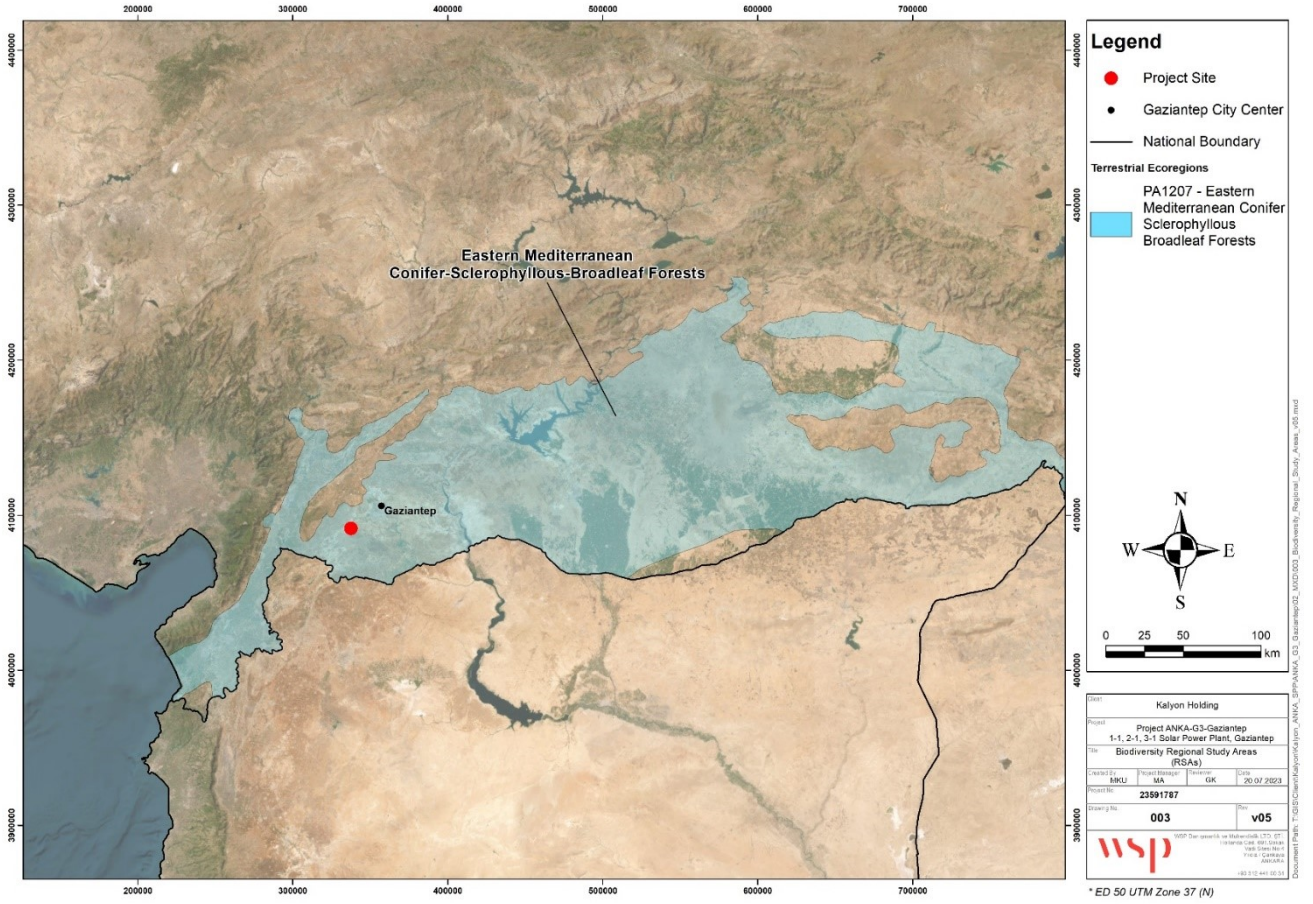


Figure 4: Map showing the location of the Project Site within the terrestrial ecoregion “Eastern Mediterranean conifer-sclerophyllous-broadleaf forests – PA1207”

The main Natural Habitat identified within the AoI, according to EUNIS classification, is represented by “Mediterranean Xeric Grassland” (E1.3 EUNIS Habitat Code). This habitat covers approximately 50% of AoI. The only other Natural Habitat identified is represented by “Basic and Ultra-Basic Inland Cliffs” (H3.2 EUNIS Habitat Code), covering approximately 2% of AoI. Modified Habitats cover overall a percentage of 48% of AoI and include “Mixed Crops of Market Gardens and Horticulture” (I1.2, 46%), “Scattered Residential Buildings” (J2.1, 2%), and “Highly Artificial Non-Saline Standing Waters (J5.1, <1%)”. A map showing the different Natural and Modified Habitats identified within the AoI is provided in **Hata! Başvuru kaynağı bulunamadı.**

Mediterranean Xeric Grasslands are Meso- and thermos-Mediterranean xerophilous, mostly open, short-grass perennial grasslands rich in therophytes. Therophyte communities find their best conditions on oligotrophic soils and can be assigned to Thero-Brachypodieta class. The characteristic species of this habitat are herbaceous plants such as such as *Hordeum bulbosum*, *Aegilops* sp., *Poa bulbosa*, *Cornucopia cucullata*, *Trifolium stellatum*, *Parentucellia* sp., *Lagoecia cuminoides*, *Phlomis* sp., and *Festuca valesiaca*.

Basic and Ultra-Basic Inland Cliffs are dry, sparsely vegetated, calcareous inland cliffs, colonized by highly specific plant associations. These cliffs are specific to the Mediterranean Region and typical species are *Ceterach officinarum*, *Asplenium* sp., and *Sedum* sp.

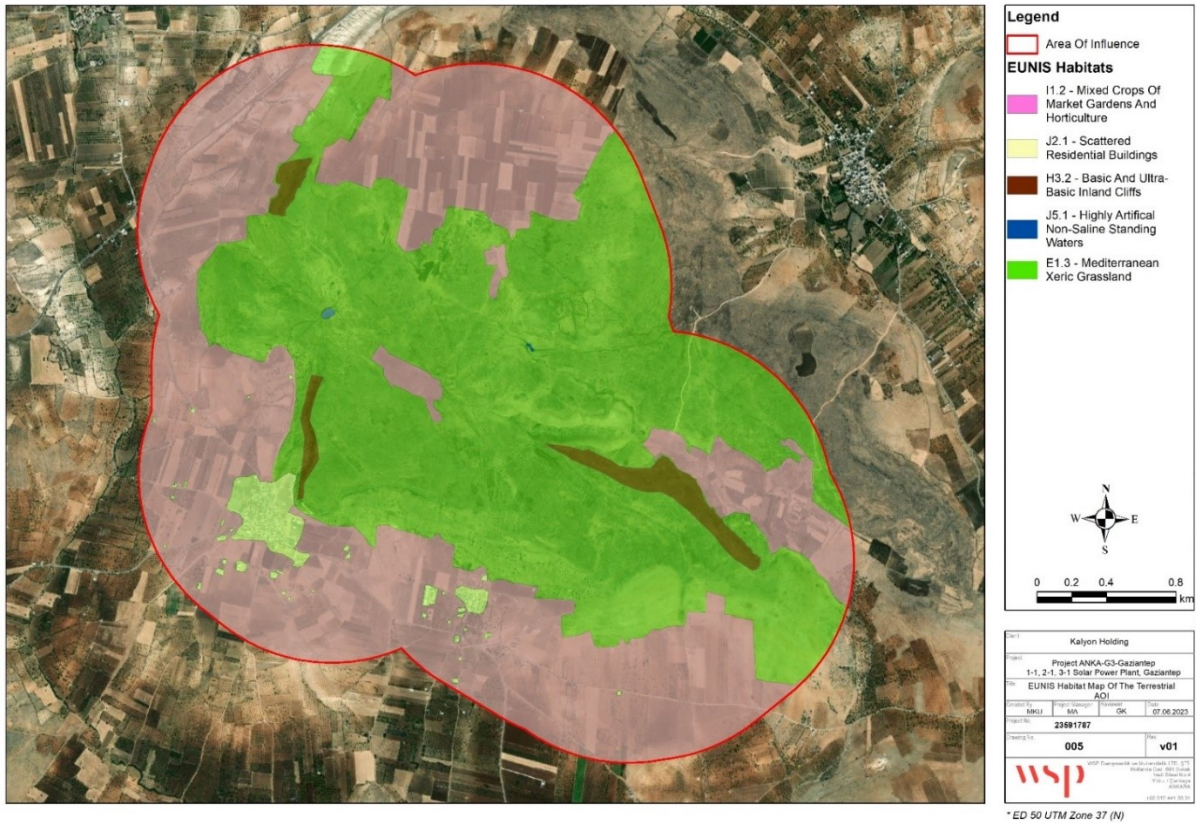


Figure 5: EUNIS habitat map of the Project Aol

6 SUMMARY OF CRITICAL HABITATS

The Critical Habitats (CHs) identified in the ESIA report in accordance with IFC Performance Standard 6 Criteria (IFC PS6, 2019) within the Aol are triggered by:

- 2 flora species;
- 1 fauna species.

A summary of the species triggering CH within the Aol for the different criteria is given in Table 2 below.

Table 2: Species triggering Critical Habitat in the Aol, according to IFC PS6 Criteria

Taxon	Species	Common name	Global IUCN Status	Local IUCN Status	End./ RR	Lit. / Obs.	IFC Criteria
Flora	<i>Symphytum aintabicum</i>	-	-	VU	Restricted Range*	O	Criterion 1a & 2a
	<i>Alopecurus utriculatus</i> subsp. <i>gaziantepicus</i>	-	-	CR	Restricted Range*	O	Criterion 1a & 2a
Mammal	<i>Mesocricetus auratus</i>	Golden Hamster	EN	-	Restricted Range	L	Criterion 1a

* In absence of more precise data of distribution, the EOO is conservatively identified as the floristic ecoregion "(7a) Orta Fırat-Dicle Section", where the species is found. However, it is likely that the species range is smaller in reality and potentially below 50,000 km². Therefore, using a precautionary

approach the species is considered as Restricted Range.

In addition, among flora and fauna species identified as present or potentially present within the Aol, “**species of conservation concern**” were defined by considering the flora and fauna species classified as Near Threatened (NT), Vulnerable (VU), Endangered (EN), or Critically Endangered (CR) at a global or regional level according to IUCN Red List of Threatened Species², and by also considering the locally or regionally endemic species present or potentially present within the Aol. These species are listed in Table 3. These species were considered for the definition of the mitigation measures and the monitoring actions within the present BMP.

Table 3: Flora and Fauna Species of Conservation Concern Identified within the Aol

Taxon	Species	Common name	Global IUCN Status	Local IUCN Status	End./ RR	Lit./ Obs.
Flora	<i>Symphytum aintabicum</i>	-	-	VU	Restricted Range*	O 2023
	<i>Alopecurus utriculatus</i> subsp. <i>gaziantepicus</i>	-	-	CR	Restricted Range*	O 2023
	<i>Anthemis tricornis</i>	-	-	NT	Regional Endemic	O
Reptile	<i>Testudo graeca</i>	Common Tortoise	VU	-	-	O 2022, O 2023
Bird	<i>Aquila nipalensis</i>	Steppe Eagle	EN	-	-	L
	<i>Aquila heliaca</i>	Eastern Imperial Eagle	VU	-	-	L
	<i>Falco vespertinus</i>	Red-footed Falcon	VU	-	-	H
	<i>Neophron percnopterus</i>	Egyptian Vulture	EN	-	-	L
	<i>Streptopelia turtur</i>	European Turtle Dove	VU	-	-	O 2023
	<i>Vanellus gregarius</i>	Sociable Lapwing	CR	-	-	L
Mammal	<i>Mesocricetus auratus</i>	Golden Hamster	EN	-	Restricted Range	L
	<i>Miniopterus schreibersii</i>	Schreiber's Bent-winged Bat	NT	-	-	L
	<i>Rhinolophus euryale</i>	Mediterranean Horseshoe Bat	NT	-	-	L
	<i>Rhinolophus mehelyi</i>	Mehelyi's Horseshoe Bat	VU	-	-	L
	<i>Vormela peregusna</i>	Marbled Polecat	VU	-	-	L

* In absence of more precise data of distribution, the EOO is conservatively identified as the floristic ecoregion “(7a) Orta Fırat-Dicle Section”, where the species is found. However, it is likely that the species range is smaller in reality and potentially below 50,000 km². Therefore, using a precautionary approach the species is considered as Restricted Range.

² The International Union for the Conservation of Nature Red List of Threatened Species – Source: <https://www.iucnredlist.org/>

7 SUMMARY OF POTENTIAL IMPACTS

This section summarizes the potential impacts of the Project during the construction, operation and decommissioning phases on Biodiversity and Natural Habitats. For a full description of the impacts, see section 7.2 of the ESIA.

7.1 Construction Phase

According to the ESIA, potential impacts from Land Preparation and Construction activities are associated with the following impact factors:

- vegetation and topsoil disturbance;
- emission of noise;
- emission of particulate matter;
- increase of vehicular traffic;
- accidental introduction and dispersal of alien species.

Habitat loss and degradation will be the most significant impact deriving from vegetation disturbance during land preparation and construction phase of the Project. Although no clearing of natural vegetation is planned to be performed, it can be assumed that vegetation disturbance due to construction activities (e.g., movement of vehicles, material and workers) will negatively affect the entire Project footprint and, potentially, although with lower intensity, the entire Aol.

Vegetation and flora species, including the three species identified as species of conservation concern (i.e., *Alopecurus utriculatus* subsp. *gaziantepicus*, *Anthemis tricornis*, and *Symphytum aintabicum*), will be affected at the same time by several of the above listed impact factors, first of all by vegetation and soil disturbance.

Fauna species sensitive to the construction impacts will be the ones characterized by a low-mobility and/or the ones whose ecological requirements are strongly connected to the soil, in particular among the species of conservation concern Common Tortoise (*Testudo graeca*, VU), Golden Hamster (*Mesocricetus auratus*, EN and Restricted Range), and Marbled Polecat (*Vormela peregusna*, VU). Bird and bat species are considered to be less affected by the construction phase due to their higher mobility and the fact that the Aol could be considered only as a potential feeding/hunting ground for these species and not as a nesting site.

7.2 Operation Phase

According to the ESIA assessment, potential impacts from operational activities are associated with the following impact factors:

- presence of permanent infrastructures;
- emission of noise;
- emission of light;
- accidental introduction and dispersal of alien species.

Habitat loss and modification will be the most significant impact deriving from presence of permanent infrastructures, including PV panels. However, flora and vegetation are expected to at least partially recover during the operation phase, due to rehabilitation of the temporary facilities, but also in the area of the PV panels. Indeed, the modified temperature and soil conditions under the PV panels and the grazing exclusion could potentially promote an increase in local species richness, diversity and biomass for the most common and generalist flora species, in comparison with the surrounding Mediterranean Xeric Grassland (E1.3 EUNIS Habitat Code). The effect of grazing exclusion and of shade offered by the PV panels on the three flora species identified as species of conservation concern (*Alopecurus utriculatus* subsp.

gaziantepicus, *Anthemis tricornis*, and *Symphytum aintabicum*) is less clear and will need to be monitored during this phase.

For some fauna species the presence of a fenced area occupied by permanent facilities and PV panels will create a loss of potential habitats, while for others, in particular among the species of conservation concern Common Tortoise (*Testudo graeca*, VU), Golden Hamster (*Mesocricetus auratus*, EN and Restricted Range), and Marbled Polecat (*Vormela peregusna*, VU), the area could still be considered a suitable habitat, and in some cases the fence and the PV panels could even offer protection from grazing and from predators. The disturbance for terrestrial fauna species, and in particular to species of conservation concern, due to emission of noise and the presence of artificial lights connected to the operation phase is expected to be minimal. Terrestrial fauna species are expected to habituate to these forms of disturbance, deriving from operation and maintenance activities.

7.3 Decommissioning Phase

The Project is not expected to be decommissioned at least for 30 years. Impacts during decommissioning are expected to be temporary and the magnitude of the impact will depend on how much of the infrastructure is removed.

The general focus of the decommissioning and closure phase is to rehabilitate the disturbed lands to create stable, non-polluting and self-sustaining ecosystem capable of being incorporated into the future landscapes, which will be consistent with activities in the general surrounding area. However, considering that Decommissioning and Closure will not happen for many years, the future land use of the area is not known, and no detailed information is available at this stage, it is not possible to discuss in the details the effects of this phase on the biodiversity component.

In general, it is expected that during decommissioning, the impact factors will be similar to those considered for the construction phase:

- infrastructure removal;
- emission of noise;
- increase in vehicular traffic;
- accidental introduction and dispersal of alien species.

However, positive impacts deriving from the re-establishment of natural vegetation and the restoration of the disturbed areas will allow to reclaim most of the areas with an expected overall positive effect on biodiversity compared to the operation phase.

8 MANAGEMENT & MITIGATION REQUIREMENTS

8.1 Construction

The Project will seek to proactively address impacts and proposes to use an adaptive management approach (plan-do-check-act-replan) to reduce their potential severity.

The Project will follow the principles of the “mitigation hierarchy” as defined under EBRD E&S Policy 2019 – “measures taken to avoid creating environmental or social impacts from the outset of development activities, and where this is not possible, to implement additional measures that would minimize, mitigate, and as a last resort, offset and/or compensate any potential residual adverse impacts”.

The present BMP includes actions that correspond to the first three elements of the mitigation hierarchy, as described below:

- Avoidance: actions taken to fully prevent impacts to biodiversity values, such as changing the spatial design of a project to prevent impacts in specific locations

- Minimization: actions taken to reduce the duration, intensity and/or extent of impacts that cannot be completely avoided
- Rehabilitation/Restoration: actions taken to return areas to beneficial use and, if possible, assist in the recovery of the ecosystem that has been degraded, damaged, or destroyed.

Hata! Başvuru kaynağı bulunamadı. details the environmental management and mitigation measures/actions identified for BIO management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID);
- Measure/Action: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- Status: progress of the measures/actions.

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is to select the most appropriate measures to limit negative impacts to the environment as far as possible.

This process is intended as an adaptive management system, so that the mitigation and management approach will be adapted based on any new findings which could arise from the additional studies and monitoring program described in the following section.

In case during monitoring non-conformities or unexpected residual impacts due to the Project are identified on site, the Kalyon Enerji Biodiversity Assistant Specialist will evaluate the situation and, if needed, propose changes and integrations to the mitigation and monitoring activities included in the present BMP.

The proposed changes will be evaluated - by Kalyon Enerji Environment, Climate Change, and IMS Executive and approved by Kalyon Enerji Chief Sustainability Officer.

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	Status
BIO01	<u>Avoidance: micro-siting of project facilities</u> <ul style="list-style-type: none"> Minimization of the footprint of individual facilities. Utilization of the existing modified habitat for placement of temporary facilities was prioritized as much as possible. 	IFC PS6	During the detailed engineering phase	Final placement of project facilities.	EPC Project Manager	Ongoing
BIO02	<u>Minimization: vegetation disturbance</u> <p>Limits of construction areas will be clearly signed or fenced in order to reduce the risk of footprint creep.</p> <p>In addition, vehicle movement will be restricted to the existing roads that connect the construction sites with the surrounding areas. Off road driving will be prohibited in order to avoid any unnecessary disturbance of natural vegetation.</p>	IFC PS6	Before the beginning of site preparation	Fencing /delimitation of construction areas	EHSS Chief Kalyon Enerji Biodiversity Assistant Specialist	Ongoing
BIO03	<u>Minimization: flora pre-construction surveys</u> <p>Before the beginning of site preparation an expert botanist will perform a survey during the flowering period (May/June) of the flora species identified as potentially present in the areas to be cleared of vegetation and its immediate surroundings.</p> <p>The data regarding date, location, population extension and number of individuals will be recorded to allow for the correct planning and execution of the following mitigation measures.</p>	IFC PS6	Before the beginning of site preparation	Flora pre-construction survey performed in all areas to be developed	Kalyon Enerji Biodiversity Assistant Specialist	Completed
BIO04	<u>Minimization: flora on-site conservation</u> <p>Direct disturbance on natural vegetation, in particular in the areas where flora species triggering CH (<i>Alopecurus utriculatus</i> subsp.</p>	IFC PS6	Before the beginning of site	Protection of all populations that might be	Kalyon Enerji Biodiversity Assistant Specialist	Not started

	<p>gaziantepicus, CR, and Symphytum aintabicum, VU) have been identified will be avoided whenever feasible.</p> <p>Population of these species not directly impacted by the Project footprint but located within 100 m from construction or operation areas will be actively protected from any indirect impact. Exclusion zones at these stations, where soil and vegetation will be preserved and access</p> <p>Conservation of flora species determining CH, situated in the vicinity of the Project (100 m) shall be guaranteed. These areas will be by clearly identified both on the maps and in the field as exclusion zone where soil and vegetation will be preserved, and access will not be permitted.</p>		preparation	indirectly affected by the Project		
BIO05	<p><u>Minimization: flora salvaging and translocation</u></p> <p>Flora individuals belonging to flora species determining CH, directly impacted by the Project shall be identified, salvaged prior to construction and directly translocated to the appropriate sites. The identification and flagging of individuals to be translocated will take place preferably during the flowering season of the species, while the translocation of individuals be performed during the dormant stage in order to minimize stresses to the plant.</p> <p>The data regarding date, location, source populations and number of individuals collected and translocated will be recorded.</p> <p>A Salvaging and Translocation Plan will be prepared based on the construction schedule. Collection and translocation techniques and suitable translocation sites will also be identified within the Plan.</p>	IFC PS6	Before the beginning of site preparation	Salvaging of all populations directly affected by the Project	Kalyon Enerji Biodiversity Assistant Specialist	Not started
BIO06	<p><u>Minimization: flora seed collection</u></p> <p>Seed collection will be performed for the directly impacted populations of the identified flora species triggering CH.</p> <p>The seed collection and conservation will follow the best practice indicated by the Millenium Seed Bank.</p> <p>Seeds collected will be separately stored for each species and sub population using clearly identifiable codes and will be donated to the Ankara Seed Bank for storage and scientific research.</p>	IFC PS6	Before the beginning of site preparation	Seed collection of the flora species triggering CH for the populations directly affected by the Project	Kalyon Enerji Biodiversity Assistant Specialist	Not started

BIO07	<p><u>Minimization: fauna pre-construction survey</u></p> <ul style="list-style-type: none"> In order to minimize the mortality of wildlife species, pre-construction surveys will be implemented before the beginning of site preparation to identify and eventually relocate fauna species. An Kalyon Enerji Biodiversity Assistant Specialist will perform pre-construction surveys in the areas where construction activities will be implemented (not earlier than 7 days before). The survey will focus on fauna species with limited mobility that cannot move ahead of construction, and in particular among the identified specie of conservation concern on Common Tortoise (<i>Testudo graeca</i>, VU), Golden Hamster (<i>Mesocricetus auratus</i>, EN and Restricted Range), and Marbled Polecat (<i>Vormela peregusna</i>, VU). If any of these species are observed, they will be collected by Kalyon Enerji Biodiversity Assistant Specialist and translocated to undisturbed but similar sites within the Aol. Reptiles will be caught and moved to a suitable receptor site, no smaller than the capture site and containing the same habitat characteristics and prey availability, at a minimum distance of 50 m from the Project footprint during construction phase. If essential works are required in winter, when tortoise are hibernating, then the works area should be checked carefully for hibernation burrows. If a reptile is found during such works and it is hibernating, it should be carefully moved to an alternative part of the site that will remain undisturbed. If this is not possible, then the animal should be taken in to care until it can be released on site, the following spring. The monitoring of the activity of the small mammal species identified as species of conservation concern, in particular of Golden Hamster (<i>Mesocricetus auratus</i>) and Marbled Polecat (<i>Vormela peregusna</i>) will be performed, through the use of endoscopic cameras located within their burrows. If any living specimen is observed and essential works that involve breaking ground are required in the areas where burrows are present, a gradual increase of the level of disturbance over a few days (at 	IFC PS6	Before the beginning of site preparation	Fauna pre-construction survey performed in all areas where construction activities will occur.	Kalyon Enerji Biodiversity Assistant Specialist	Ongoing
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	least 3 consecutive days) will be implemented, in order to allow for the animal to autonomously leave the burrow before it is fully excavated (e.g., day 1 manual excavation, day 2 manual excavation, day 3 mechanical excavation in the vicinity of the borrow).					
BIO08	<p><u>Minimization: wildlife management</u></p> <ul style="list-style-type: none"> • Vehicle movement will be restricted to the existing roads that connect the construction sites with the surrounding areas. Off road driving will be prohibited in order to avoid any unnecessary disturbance of wildlife species. • Speed limits and animal crossing signs will be installed on the access road and speed limits will be enforced. • The use of construction vehicles at night should be avoided in order to minimize the risk of traffic collisions with fauna. • Avoid the accumulation of stagnant water and organic waste within the construction site and on the roads, that could attract wildlife. • Feeding of wildlife or stray cats and dogs will be prohibited on-site. Fauna carcasses will be removed, and organic waste will be carefully managed and disposed in order to avoid attraction of wildlife or stray cats and dogs. • If fauna species are encountered employees and contractors will wait until it moves on by itself or they will ask the assistance of the Biodiversity Assistant Specialist for its safe removal and relocation in a suitable environment. • Awareness among employees and contractors working on site about the protected species/habitats potentially present in the area will be developed, in order to ensure constant monitoring and promote actions to be taken if wildlife is encountered. 	IFC PS6	During construction phase	Full implementation of all wildlife management actions within and around Project construction sites	EHSS Chief employees and contractors	All and Not started
BIO09	<p><u>Minimization: fencing gaps</u></p>	IFC PS6	Implemented at the beginning of	Fences construction details.	EHSS Chief	Ongoing

	<p>In order to minimize the impact of habitat fragmentation for mammals and reptiles, gaps within the fencing will be implemented at the beginning of the construction phase and they will persist through operation phase.</p> <p>Fencing will be modified so that a gap measuring 1 m in length and 10 cm in height from ground level is created every 100 m. This gap will allow animals to move in to and out of the project site, thus maintaining population transfer with populations located in areas outside of the project. All new fences will conform to this design.</p>		construction phase			
BIO10	<p><u>Minimization: noise and vibrations</u></p> <ul style="list-style-type: none"> Care will be taken to select machines and equipment with low noise emissions. Night works in proximity of natural habitats will be avoided to reduce impacts to nocturnal fauna species. The number and the speed of vehicle movements along the existing access road will be limited. 	IFC PS6	During construction phase	Full implementation of all noise management actions within and around project construction sites.	EHSS Chief	Not started
BIO11	<p><u>Emission of particulate matter</u></p> <ul style="list-style-type: none"> Dust deriving from construction material handling will be minimized by using covers and/or control equipment and increasing the moisture content by water spraying. Speed limit for all vehicles will be implemented so as not to generate dust emissions, and all trucks will be properly maintained at all times. Internal roads will be adequately compacted, maintained, and sprayed with water if needed, to minimize dust from vehicle movements. If water spraying is deemed insufficient, other means of surface treatment (e.g., hygroscopic media, such as calcium chloride, and soil natural-chemical binding agents) for unpaved internal roads will be implemented, by using a sprinkler system or a "water-mist cannon". 	IFC PS6	During construction phase	Full implementation of all the suggested actions in order to minimize the dust emission and spread.	EHSS Chief	Not started

BIO12	<p><u>Rehabilitation/Restoration:</u></p> <ul style="list-style-type: none"> • Areas cleared during construction for temporary use will be restored, as soon as possible, with the goal of producing a stable vegetative cover to minimize erosion, dust and spreading of invasive alien species, and the aim of re-establish the original habitat with a positive impact on biodiversity. • Only plants that are native to the region will be used for rehabilitation and restoration activities. Seeding and planting of species of conservation concern and other grass and shrub species typical of the local vegetation will be used to ensure optimal ground cover. • The use of non-native flora species, and especially of species classified as invasive alien species must be avoided during rehabilitation/restoration works. • If spreading of invasive species is observed, an appropriate eradication program will be developed and implemented. 	IFC PS6	At the end of the construction phase	Restore of all the areas temporarily used during construction, as soon as possible (where possible even before the end of the entire construction phase)	Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)	Not started
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8.2 Operation

Hata! Başvuru kaynağı bulunamadı. details the environmental management and mitigation measures/actions identified for BIO management activities during operation phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID);
- Measures/Actions: description of the mitigation measures/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key Performance Indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- Status: progress of the measures/actions.

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is to select the most appropriate measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system, so that the mitigation and management approach will be adapted based on any new findings which could arise from the additional studies and monitoring program described in the following section.

In case during monitoring non-conformities or unexpected residual impacts due to the Project are identified on site, the Kalyon Enerji Biodiversity Assistant Specialist will evaluate the situation and, if needed, propose changes and integrations to the mitigation and monitoring activities included in the present BMP.

The proposed changes will be evaluated - by Kalyon Enerji Environment, Climate Change, and IMS Executive and approved by Kalyon Enerji Chief Sustainability Officer.

Table 5: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	Status
BIO13	<p><u>Avoidance: micro-siting of project facilities</u></p> <ul style="list-style-type: none"> Minimization of the footprint of individual facilities. Utilization of the existing modified habitat for placement of temporary facilities was prioritized as much as possible. 	IFC PS6	During the detailed engineering phase	Final placement of Project permanent facilities.	Operation Chief	Ongoing
BIO14	<p><u>Presence of permanent infrastructures</u></p> <ul style="list-style-type: none"> The fences delimiting the areas occupied by permanent infrastructures will be modified so that a gap measuring 1 m in length and 10 cm in height from ground level is created every 100 m. These gaps will allow animals to move in and out of the project site, thus maintaining population transfer with populations located in areas outside of the project. All new fences will conform to this design. Non-reflective coating will be applied to all PV panels to minimize reflection, which could attract aquatic insects and possibly birds, as it mimics reflective surfaces of waterbodies. 	IFC PS6	During operation phase	Full preparation of gaps in the fences and disposal of non-reflective coating on all PV panels.	EHSS Chief Kalyon Enerji Biodiversity Assistant	Not started
BIO15	<p><u>Speed Limits and Driving Limits within the Project Site</u></p> <ul style="list-style-type: none"> During operation phase, driving will only be permitted on official internal site roads and off-road driving/parking will be prohibited unless driving within a designated area (e.g., for maintenance operations). Site wide speed limits set at 20kph will be enforced throughout operation phase to prevent killing or injury to fauna species. 	IFC PS6	During operation phase	Information included in induction and training; Evidence of signage, log to be kept of monitoring of speed limits completed by site security; Records of permits to drive in off-road areas. Records of any killing or injury incidents recorded and reported.	EHSS Chief	Not started

				Checks of records during E&S Audit visits.		
BIO16	<u>Site Cleanliness and Control of Stray Animals and Pests</u> <ul style="list-style-type: none"> The site, including all offices and workers' buildings, are to be kept free of rubbish and litter, including food waste, as these might attract pest species, feral dogs and cats and/or scavenging birds. All waste will be placed into appropriate bins and containers which will be appropriately sealed (e.g., lids or covers) to prevent pest species entering. Feeding of wildlife or stray cats and dogs will be prohibited on-site. The presence of stray animals on site will be discouraged. If necessary, a program to capture, neuter and rehome - or safely release - stray animals will developed by Kalyon in coordination with local authorities, NGO's or private veterinary in order to control and reduce the number of stray animals. If rats or other pests are present at the site, mechanical control measures must be used. This will involve the setting of live traps, which will be checked at least three times a day (morning, afternoon and evening) and if pest species are caught, they will be humanely killed. Any non-target species that are caught will be released, unharmed, away from site buildings Chemical control (e.g., poison baits) will not be used due to the potential to harm other species of conservation concern within the Project Site. 	IFC PS6	During operation phase	Records of housekeeping and waste disposal to be documented and reported. Checks of records during HSE Audit visits. Records of incidents of pest species being found to be kept along with records of control measures and outcomes. Checks of records during HSE Audit visits.	EHSS Chief Kalyon Enerji Biodiversity Assistant	Not started
BIO17	<u>Hunting/ Collection of Animals and Plants</u> <p>The ban on hunting and or collection of animals and plants from the Project Site will be strictly enforced by Kalyon and this will avoid and minimise any operational related impacts on biodiversity features within the Project Site. All contractors and site staff will be reminded that this ban is also effective within areas outside of the Project Site.</p>	IFC PS6	During operation phase	Information included in induction and training; Evidence of signage. Site security staff to enforce this.	EHSS Chief Kalyon Enerji Biodiversity Assistant Kalyon Enerji Environmental	Not started

					Manager	
BIO18	<u>Presence of artificial lights</u> <ul style="list-style-type: none"> It is recommended to keep the number of light sources to the minimum; Preferred types of light in exterior lighting (e.g.: lights on site due to security reasons) applications are: <ul style="list-style-type: none"> low pressure sodium lamps (SOX): orange lamps seen along roadsides; light emitting diodes (LEDs): light source of choice, emitted more directional, warmer colour temperatures (~ 3000°K); these types of lights should be avoided: <ul style="list-style-type: none"> mercury lamps (MBF): bluish-white lamps (attract insects and tolerant bat species); high pressure sodium lamps (SON): brighter pinkish-yellow lamps, used as road lighting. 	IFC PS6	During operation phase	Full disposal of low pressure sodium lamps or light emitting diodes.	EHSS Chief	Not started
BIO19	<u>Habitat Rehabilitation/Restoration</u> <ul style="list-style-type: none"> Areas under the PV panels will be restored, as soon as possible, with the goal of recreating the original natural habitat and possibly enhancing flora species richness and diversity. The restoration will be based on a long-term plan, with the aim of producing a stable vegetative cover to minimize erosion, dust deposition and spreading of invasive alien species. Only plants that are native to the region will be used for restoration and habitat rehabilitation. Seeding and planting of grass and shrub species typical of the local flora will be implemented to ensure optimal ground cover. The use of autochthonous adult plants and/or of seeds collected at the shortest distance possible from the restoration sites will be of 	IFC PS6	During operation phase	Records of measure to be kept and reported by the Biodiversity Specialist(s).	Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)	Not started

	<p>fundamental importance in order to maximize the success of the translocation operations.</p> <ul style="list-style-type: none"> • Trampling and offroad driving will be prevented as much as possible in the rehabilitating area and between the panels. • Seeding will be performed in autumn in areas with low vegetation (<25%) cover within the Project Site to promote the recovery of natural vegetation. In order to protect the seeds from wind erosion a light mulching from periodic vegetation clearance, hay or wood chips will be applied. Watering will be applied after seeding and mulching to promote the adherence of the seed and the mulching to the soil. • In case of soil compaction due to the presence of temporary facilities or heavy machinery traffic, the soil surface will be loosened up mechanically before proceeding with the seeding and mulching. • If no sufficient improvement in vegetation cover is observed after the first application, seeding and mulching will be repeated on multiple years until a vegetation cover >25% is reached. 					
BIO20	<p><u>Flora Species of Conservation Concern and triggering CH</u></p> <p>Conservation of the populations of flora species determining CH (<i>Alopecurus utriculatus</i> subsp. <i>gaziantepicus</i>, CR, and <i>Symphytum aintabicum</i>, VU) and of the flora species of conservation concern (<i>Anthemis tricornis</i>, NT), located in the vicinity of the Project (100 m) shall be guaranteed. The areas where the populations are found will be clearly identified both on the maps and in the field as exclusion zones where soil and vegetation will be preserved, and access will not be permitted.</p> <p>Translocation areas should be identified for flora species determining CH.</p>	IFC PS6	During operation phase	Records of measure to be kept and reported by the Biodiversity Specialist(s).	Kalyon Enerji Biodiversity Assistant Specialist	Not started

	Additional mitigation/offset measures will be put in place if needed based on the results of the periodical monitoring.					
BIO21	<p><u>Fauna Species of Conservation Concern and triggering CH – Reptiles & Mammals</u></p> <ul style="list-style-type: none"> Routine maintenance work, including vegetation clearing may be required when scrub and shrubs have grown to a height which determines a partial shading of the panels or prevents access to the panels for inspections or repairing operations. Where vegetation needs to be cleared it will be checked by the Kalyon Enerji Biodiversity Assistant Specialist prior to its removal. Cutting will be done using hand tools only (e.g., handsaw/ chainsaw) and the arisings moved to areas of the site where they can be stored as a brash/ habitat pile. Mechanical clearance of large areas of vegetation will not be performed. In addition, pesticides must not be used anywhere on the site. If Common Tortoise (<i>Testudo graeca</i>, VU) or other reptiles are encountered during these pre-works checks, they will be picked up and moved out of the working area. If essential works that involve breaking ground, including the replacement of panel stands, are required in winter, when tortoise are hibernating, then the work area should be checked carefully for hibernation burrows. If a reptile is found during such works and it is hibernating it should be carefully moved to an alternative part of the site that will remain undisturbed. If this is not possible then the animal should be taken into care until it can be released on site, the following spring. If burrows of the identified species of conservation concern Marbled Polecat (<i>Vormela peregusna</i>, VU) or of the CH triggering Golden Hamster (<i>Mesocricetus auratus</i>, EN and Restricted Range) are found in areas of operational works, these should not be driven over. If essential works that 	IFC PS6	During operation phase	Location and characteristics of built hibernacula. Pre-works checks: permit to work to include sign off that works area has been checked by the Biodiversity Specialist(s) for reptiles. Records of pre-works checks kept. Biodiversity Specialist(s) and all Employees and contractor to report any sightings of reptile or mammal species, especially of species of conservation concern on the site. Records of sightings kept.	Kalyon Enerji Biodiversity Assistant Specialist	Not started

	involve breaking ground, including the replacement of panel stands, are required in areas where burrows are present this will be done by gradually increasing the level of disturbance over a few days (at least 3 consecutive days) to allow for the animal to autonomously leave the burrow before it is fully excavated (e.g., day 1 machinery and equipment brought to the working area, day 2 manual excavation, day 3 mechanical excavation in the vicinity of the borrow).					
BIO22	<p><u>Fauna Species of Conservation Concern – Birds</u></p> <p>Routeing maintenance work should be completed before the breeding season (March to August) of the identified bird species of conservation concern to avoid disturbance to birds eventually breeding in the Mediterranean xeric grassland areas affected by the Project. If essential works including disturbance of vegetation, are required during the breeding period, the work areas and access roads should be checked by the Kalyon Enerji Biodiversity Assistant Specialist to ensure the absence of breeding birds/nests. If nesting birds are found in the work area or in the immediate vicinity, work may have to be delayed until the natural cessation of the nesting effort.</p>	IFC PS6	During operation phase	Pre-works checks: permit to work to include sign off that works area has been checked by the Biodiversity Specialist(s) for reptiles. Records of pre-works checks kept. Environmental Engineer and all Employees and contractor to report any sightings of bird species and especially of species of conservation concern on the site. Records of sightings kept.	Kalyon Enerji Biodiversity Assistant Specialist	Not started
BIO23	<p><u>Invasive Species:</u></p> <p>The use of non-native flora species, and especially of species classified as invasive alien species must be avoided during rehabilitation/restoration works. However, if spreading of invasive species is anyway observed, an appropriate eradication program will be developed and implemented.</p> <p>Measures regarding the control of invasive species will be fully implemented throughout the operation of the project.</p>	IFC PS6	During operation phase	Records of measure to be kept and reported by the Environmental Engineer.	Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)	Not started

9 TRAINING & AWARENESS

All employees including employees of Client, EPC, and its sub-contractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

Awareness among employees of Client, EPC, and its sub-contractors working on site will be developed for what concerns the protected/threatened species and habitats potentially present within the Aol. Training will be given also in order to ensure that all the mitigation measures indicated in this Management Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

All the workers will follow a general training concerning all the aspects regarding Biodiversity and the related prohibitions and best behaviours to be adopted (i.e., safe actions to be taken if wildlife is encountered, prohibition of feeding of wildlife or stray cats and dogs, removal of fauna carcasses, management of organic waste, avoidance of accumulation of stagnant water, cleanliness to be maintained within the Project site and in particular in all offices and workers' buildings, measures to be taken if rats or other pests are observed, the ban on hunting and the collection of animals and plants within the Project Site).

In addition, all drivers employed by the Client, EPC, and its sub-contractors will undertake a specific training regarding the issues related to the use of vehicles (i.e., speed limits to be respected, restriction of the vehicle movements to the existing roads, removal of fauna carcasses along the road, behaviour to be adopted if wildlife species are encountered along the road).

The EHSS Chief will be the main responsible for these trainings.

10 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

10.1 Monitoring Activities

The following tables details the monitoring actions identified for BIO management activities during the construction and operation phases. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/actions have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID);
- Monitoring Activity: description of the monitoring activity;
- Source document: the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);

- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- Status: progress of the measures/actions.

Monitoring actions for construction phase are presented in **Hata! Başvuru kaynağı bulunamadı.** below.

Monitoring actions for operation phase are presented in Table 7 below.

Table 6: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	Status
BIO24	<p><u>Footprint creep and other inadvertent impacts</u></p> <p>Inadvertent impacts on natural habitats present around the construction site will be monitored monthly in order to be able to put in place corrective actions in a timely manner whenever needed (eventual driving outside designated areas, signs of dust accumulation, presence of waste or hazardous substances spill, etc.)</p>	IFC PS6	During the entire construction phase.	No inadvertent impacts on natural habitats during construction	EHSS Chief	Not started
BIO25	<p><u>Minimization: wildlife management</u></p> <p>Accidents involving wildlife or the observation of live animal or carcasses along the access road or on the construction site will be recorded. In particular any observation of the CH triggering mammal species Golden Hamster (<i>Mesocricetus auratus</i>, EN and Restricted Range) and of the identified species of conservation concern (<i>Testudo graeca</i>, VU, and <i>Vormela peregusna</i>, VU), within and around the Aol, shall be registered also with photographic documentation and signalled to the Kalyon Enerji Biodiversity Assistant on site.</p> <p>Additional mitigation measures to discourage wildlife presence on site and avoid roadkill will be taken if needed.</p>	IFC PS6	<p>During the entire construction phase.</p> <p>Reports of incidents/ observations to be presented every 3 months.</p>	<p>No accidents involving wildlife or the observation of carcasses.</p> <p>Register of wildlife observations from employees/ contractors.</p>	<p>EHSS Chief</p> <p>Kalyon Enerji Biodiversity Assistant Specialist</p>	Not started
BIO26	<p><u>Invasive Species</u></p> <p>Presence and spreading of invasive flora species within and around the construction site will be monitored at least twice a year during the vegetative season by an expert botanist.</p>	IFC PS6	During the construction phase and, in particular, during	No spreading of Invasive Alien Species within the Project Aol.	Kalyon Enerji Biodiversity Assistant Specialist with the support of	Not started

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	Status
	If necessary, extirpation campaign will be put in place in order to avoid the spreading of the invasive species.		flowering period (June/July).		Biodiversity Consultant(s)	

Table 7: Monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	Status
BIO27	<p><u>Habitat Rehabilitation/Restoration</u></p> <p>Monitoring of rehabilitation will be performed with permanent monitoring plots both within temporary facilities and in the areas located under PV panels. Each plot will be 2x2 m² and the corners will be marked using metal poles hammered into the ground and spray painted so that they would be easy to be recognised each year. At least 10 permanent plots for the temporary facilities and 10 permanent plots for the areas under PV panels will be identified.</p> <ul style="list-style-type: none"> Location coordinates; longitude and latitude in decimal degrees and WGS 84 datum; Unique identifier for plot, Surveyors, Date; Total vegetation cover (%), vegetation cover (%) for each stratum (i.e., grass and forbs stratum, short shrubs stratum, tall shrubs stratum, tree stratum); Vegetation species for each stratum (e.g. grass and 	IFC PS6	<p>Yearly, during flowering period (June/July): during first 3 years of operation (2023-2024-2025) and in and in year 5 (2027) and 8 (2030)</p> <p>If KPI are not met within 3 years form construction monitoring will continue until the KPI are met</p> <p>If grazing is employed within the Project Site, long-term monitoring will be used to record any changes within the composition and condition of the habitats</p>	<p>All temporary facilities fully restored with species consistent with Mediterranean xeric grassland habitat and vegetation cover >50%</p> <p>All PV panels areas vegetated with species consistent with Mediterranean xeric grassland habitat and vegetation cover >50% at all locations.</p>	Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)	Not started

	<p>forbs stratum short shrubs stratum, tall shrubs stratum, tree stratum);</p> <ul style="list-style-type: none"> • threat/disturbance present (example: soil compaction, soil erosion, dust deposition, offroad driving) • disturbance level (very high, high, medium, low, none); • any other information considered useful (example: any particular fauna activities, signs of recent flooding). • Photographic documentation: perpendicular photo of the plot, landscape photos of the vegetation in the four cardinal directions (N, E, S, W). Close-up pictures show the soil surface characteristics and the amount of ground surface covered by vegetation and litter. • In addition, a walkover survey of the entire temporary facilities and PV panel areas will be completed each year to identify any areas of lower vegetation cover or other potential issues to be remediated. 		within the Project Site.			
BIO28	<p><u>Flora species of Conservation Concern and triggering CH</u></p> <p>A specific monitoring will investigate the presence and abundance of the flora species identified as triggering CH (<i>Alopecurus utriculatus</i> subsp. <i>gaziantepicus</i>, CR, and <i>Symphytum aintabicum</i>, VU) and of other flora species identified as species of conservation concern (<i>Anthemis tricornis</i>, NT). During this monitoring, any signs of direct or</p>	IFC PS6	<p>Presence and abundance (Biodiversity Advisor):</p> <p>Yearly, during flowering period: during first 3 years of operation (2023-2024-2025) and in year 5 (2027) and 8 (2030)</p>	<p>Maintain and monitor baseline presence of flora species of conservation concern within the Aol.</p> <p>No disturbance to populations of flora species of conservation</p>	<p>Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)</p>	Not started

	<p>indirect disturbance will be noted (e.g., trampling, dust deposition, soil erosion, presence of stagnant water).</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Biodiversity specialist(s).</p> <p>The monitoring will target known locations of the species, but it will also investigate the entire Project site to identify new populations. If a population belonging to a flora species of conservation concern is observed, the following data will be collected:</p> <ul style="list-style-type: none"> • Unique identifier for plot, Surveyors, Date; • unique ID and specific GPS coordinates (WGS84 system); • species of conservation concern scientific name; • estimated number of individuals; • extension of the population (m2); • cover class (Braun-Blanquet cover-abundance scale) of the species of conservation concern within the population area; • percentage (%) of flowering/fruitletting/seeding individuals (phenology of the individuals); • description of the micro habitat (location, vegetation cover %, main species etc.); • any other information considered useful (e.g. signs of 		<p>Incidental disturbance and marking (Environmental Engineer): monthly during the first 2 years of operation, every three months after the first two years.</p> <p>If KPI are not met within 3 years form construction monitoring will continue until the KPI are met.</p>	<p>concern as a consequence of construction activities.</p>		
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	<p>recent flooding, possible future disturbance);</p> <ul style="list-style-type: none"> Photographic documentation: perpendicular photo of the population, landscape photos of the vegetation in the four cardinal directions (N, E, S, W). Close-up pictures useful for species identification. <p>Identified populations of <i>Alopecurus utriculatus</i> subsp. <i>gaziantepicus</i>, <i>Anthemis tricornis</i>, and <i>Symphytum aintabicum</i> will be regularly monitored to ensure no incidental disturbance occurring and that the populations are clearly marked.</p>					
BIO29	<p><u>Monitoring of the flora translocation sites</u></p> <p>Flora translocation sites identified for flora species determining CH shall be monitored periodically for any sign of stress or disturbance.</p> <p>These monitoring will be performed in order to assess the success of translocation activities in enhancing species richness and diversity and in rehabilitating the original natural habitat.</p> <p>During the first two years after translocation monitoring shall occur monthly during the vegetative season. After the first three years monitoring shall occur every three months during the vegetative season (unless particular issues are recorded during previous monitoring).</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Biodiversity Assistant Specialist.</p>	IFC PS6	<p>Monthly during flowering period (June/July) during first 2 years after translocation.</p> <p>Every three months starting during flowering period (June/July) from the third year after translocation.</p>	Creation of new self-sustaining and stable populations	Kalyon Enerji Biodiversity Assistant Specialist with the support of Biodiversity Consultant(s)	Not started
BIO30	<p><u>Invasive Species</u></p> <p>Presence and spreading of invasive flora species in the AoI will be monitored by an expert botanist.</p>	IFC PS6	Twice a year, during flowering period (June/July): during first 3 years of operation (2023-	No spreading of Invasive Alien Species within the Project AoI.	Kalyon Enerji Biodiversity Assistant Specialist with	Not started

	<p>Particular attention will be given to the areas located under the photovoltaic panels.</p> <p>If necessary, extirpation campaign will be put in place in order to avoid the spreading of the invasive species.</p>		<p>2024-2025) and in year 5 (2027) and 8 (2030). (First year by external biodiversity consultant, after that by Kalyon Enerji Biodiversity Assistant Specialist)</p> <p>If KPI are not met within 3 years form construction monitoring will continue until the KPI are met.</p>		the support of Biodiversity Consultant(s)	
BIO31	<p><u>Fauna Species of Conservation Concern and triggering CH</u></p> <p>A terrestrial fauna monitoring will be performed at the end of construction in the areas located under the photovoltaic panels, in order to assess the possible beneficial effects offered by solar panels in offering protection from predators, therefore possibly enhancing the local fauna species richness and abundance.</p> <p>In particular, any observation of the identified reptile species of conservation concern (<i>Testudo graeca</i>), of the identified terrestrial mammal species of conservation concern (<i>Vormela peregusna</i>) and of the identified mammal species triggering CH (<i>Mesocricetus auratus</i>), within and around the Aol, shall be registered also with photographic documentation and signalled to the EHSS Chief on site.</p>	IFC PS6	<p>Yearly, during spring/summer period (May/September): during first 3 years of operation (2023-2024-2025) and in year 5 (2027) and 8 (2030).</p> <p>If KPI are not met within 3 years form construction monitoring will continue until the KPI are met.</p>	Presence of populations of species of conservation concern	Kalyon Enerji Biodiversity Assistant Specialist	Not started
BIO32	<p><u>Wildlife management and awareness</u></p>	IFC PS6	<p>During the entire operation phase.</p>	No accidents involving wildlife or the	Kalyon Enerji Biodiversity Assistant	Not started

	<p>Accidents involving wildlife or the observation of live animal or carcasses along the permanent access roads or in the areas occupied by permanent infrastructures will be recorded.</p> <p>Additional mitigation measures to discourage wildlife presence on site and avoid roadkill will be taken if needed.</p>		<p>Reports of incidents/observations to be presented every 3 months.</p>	<p>observation of carcasses.</p> <p>Register of wildlife observations from employees/ contractors.</p>	<p>Specialist or with the support of Biodiversity Consultant(s)</p>	
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10.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the **traffic management practices** of the Project.

Table 8: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
<i>TMP-KPI-1</i>	Number of traffic accident/incident	Kalyon Enerji/ EPC and its sub-contractor	Monthly	Zero per year
<i>TMP-KPI-2</i>	Number of Inspections/audits regarding traffic management completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>TMP-KPI-3</i>	Traffic-related training completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>TMP-KPI-4</i>	Total % of Traffic-related non-conformities closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>TMP-KPI-5</i>	Total % of Traffic-related grievances closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%

11 INSPECTIONS & AUDITS & REVIEW

The correct implementation of this Biodiversity Management Plan (BMP) is verified through internal inspections and audits to be carried out according to the requirements of the Environmental and Social Management Plan (ESMP) and Environmental and Social Monitoring Procedure to be implemented for the Project. "Audit and Non-Conformities Procedure" will be developed according to ESMP and implemented in order to monitor the requirement of the ESMS elements.

The schedule, the frequency, the scope and the objectives of the audit, as well as the responsible internal auditors, will be indicated in the Audit Program that will be developed and updated by Kalyon Enerji.

Internal auditing shall address:

- the correct implementation of this BMP;
- the correct development and implementation of Contractor's Plan;
- the correct and timely implementation of an auditing and review system by the Contractor;
- each of the points indicated in the tables in section **Hata! Başvuru kaynağı bulunamadı.** (mitigation measures/actions) and **Hata! Başvuru kaynağı bulunamadı.** (monitoring actions) of the present BMP;
- the establishment of a stakeholder engagement process related to the aspects addressed by this BMP.

Evidence and results of the inspection and audit activities will be included in the audit reports and in the “Non-Conformity and Preventive/Corrective Actions” records.

Kalyon Management will review the results of additional studies, inspections and audits and the progress of the Preventive/Corrective actions and, if necessary, will take additional appropriate actions according to the indications stated in “Management Review” section which should be included in the ESMP.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before the start of the operation (3-4 months before) in order to encompass and consider any information relevant to the BIO matters.

During steady state operations, this BMP will be reviewed on an annual basis and any necessary revisions will be made to reflect the changing circumstances, operational needs, or monitoring results. Revision of this BMP will be the responsibility of the Kalyon Enerji Biodiversity Assistant Specialist, who is in charge of this Plan.

11.1 Reporting of the monitoring activities

Evidence and results of the **monitoring activities** (detailed in section **Hata! Başvuru kaynağı bulunamadı.**) must be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- map of the surveyed area;
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI: regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this BMP and reference to the appointment of third parties eventually contracted to perform part of the activity, e.g., external laboratories and consultants);
- conclusions on compliance vs. KPI, and eventual observations;
- implications and recommendations in respect to adaptive management;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

11.2 Reporting of the auditing activities

Evidence of the implementation of the mitigation measures/actions (detailed in section **Hata! Başvuru kaynağı bulunamadı.**), of the timely deployment of monitoring activities (detailed in section **Hata! Başvuru kaynağı bulunamadı.**) and of related results are described in the **audit reports**. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections **Hata! Başvuru kaynağı bulunamadı.** and **Hata! Başvuru kaynağı bulunamadı.**);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified;
- detailed remedial action and follow-ups.

Finally, an **annual Biodiversity Report** will be prepared by the Kalyon Enerji Biodiversity Assistant Specialist to summarize the results of the mitigation and monitoring activities performed during the calendar year and edits to be included in the next review of the BMP based on the adaptive management.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-SOC-0006

**Cultural Heritage Management Plan and Chance Find
Procedure**

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
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1 INTRODUCTION

This document is the Cultural Heritage Management Plan and Chance Find Procedure (CHMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This CHMP provide details on the measures to be implemented to ensure that preservation of the archaeological and cultural heritage within the scope of the Project and minimization of the possible impacts. The Chance Find Procedure is prepared (Attachment-1) to provide guidance to all parties and employees regarding the actions to be taken in case of discovery of an archaeological asset.

The plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before decommissioning.

The requirements set out in this CHMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organization for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This CHMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC, its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities, and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management and protection of cultural heritage during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,

- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
CHMP	Cultural Heritage Management Plan and Chance Find Procedure
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety, and Social
EPFI	Equator Principle Financial Institution
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation
UNESCO	United Nations Educational, Scientific and Cultural Organization

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- Equator Principles (EPs) IV,

- IFC Performance Standards (PSs) and EHS Guidelines,
- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and
- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices, and procedures

2.1 National Requirements

In Turkey, the movable and immovable cultural and natural assets are under protection and conservation with the "Law on Preservation of Cultural and Natural Assets", 2863 that was amended by law numbered 3386 (Date of Acceptance: 21.07.1983, published in the Official Newspaper issue 18113 with date 23.07.1983).¹ According to the Law, essential assets which are identified as cultural and natural heritage under legal protection are identified as follows:

- Natural and immovable cultural assets belonging to the 19th century and before;
- Any immovable cultural asset constructed after the end of the 19th Century but categorized as "a significant asset which requires preservation" by the Ministry of Culture and Tourism;
- Immovable cultural assets located within the Protection Sites (in the Law, Protection Sites are defined as ancient sites and city ruins that reflect the main social, economic or architectural characteristics of their era. Protection Sites may also be locations where fundamental historical events took place or areas containing considerable natural or cultural assets with natural or cultural features requiring preservation);
- Structures, buildings or places that have witnessed significant historical events during the Turkish Independence War or the foundation of the Turkish Republic, regardless of time and registration; and
- All dwellings and buildings that have been used by Mustafa Kemal ATATÜRK without considering their time of construction or registration.

In addition to Law no: 2863 on Preservation of Cultural and Natural Assets, there are some regulations and principle decisions governing the management of cultural and natural assets. According to the Principle Decision no: 658 taken on November 5th 1999, on "Archaeological Sites, Conditions of Protection and Usage", the archaeological sites are classified into three main categories:

1st Degree Archaeological Sites: Areas requiring highest level of protection, with the exception of scientific excavations aiming their protection. Neither construction nor development are allowed in these sites. All kinds of construction, excavation, and modification activities are prohibited within the boundaries of these sites. However, for exceptional cases such as the necessity for infrastructure construction, Regional Preservation Boards may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team

2nd Degree Archaeological Sites: Sites which require medium level of protection. They should be preserved based on the conditions of protection and utilization set by the Regional Preservation Boards. Additional construction is prohibited. Similar to the 1st Degree Sites, for exceptional cases such as necessity for infrastructure construction among others, Regional Preservation Boards may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.

¹ <https://www.mevzuat.gov.tr/MevzuatMetin/1.5.2863.doc>

3rd Degree Archaeological Sites: Lowest level of protection area. Construction is permitted based on the decisions of Regional Preservation Boards. Before applying for a construction permit, test pit excavations should be conducted and the outcomes of these excavations should be reviewed by the relevant museum and, if present, the head of the scientific excavation team. Reviews should be submitted to Regional Preservation Boards. The Boards may ask for extension of the scope of test pits before taking any decision.

Furthermore, “Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets” of the Ministry of Culture and Tourism of Turkey with the approval number 94949537-160.99-51264, dated 13/03/2013 defines the procedures for salvage excavations, archaeological test pits, and other studies that might be required.

The United Nations Educational, Scientific and Cultural Organization (hereafter UNESCO) had accepted the “Convention for the Safeguarding of the Intangible Cultural Heritage” in 2003. Turkey had become party to the Convention in 2006.

According to the Article 2 of the Convention:

The “intangible cultural heritage” means the practices, representations, expressions, knowledge, skills – as well as the instruments, objects, artefacts and cultural spaces associated therewith – that communities, groups and, in some cases, individuals recognize as part of their cultural heritage. This intangible cultural heritage, transmitted from generation to generation, is constantly recreated by communities and groups in response to their environment, their interaction with nature and their history, and provides them with a sense of identity and continuity, thus promoting respect for cultural diversity and human creativity. For the purposes of this Convention, consideration will be given solely to such intangible cultural heritage as is compatible with existing international human rights instruments, as well as with the requirements of mutual respect among communities, groups and individuals, and of sustainable development.

Buildings, historic places, monuments, and artefacts are cultural property. Intangible heritage consists of nonphysical intellectual wealth, such as folklore, customs, beliefs, traditions, knowledge, and language. In 2001, UNESCO made a survey among States and NGOs to try to agree on a definition, and the Convention for the Safeguarding of the Intangible Cultural Heritage was drafted in 2003 for its protection and promotion. Turkey became a party to the Convention in 2006.

Within the Convention the “intangible cultural heritage” is manifested inter alia in the following domains:

- (a) oral traditions and expressions, including language as a vehicle of the intangible cultural heritage (myths, epics, legends, folk tales, riddles, poems, lullabies etc.);
- (b) performing arts (traditional theatre, puppets, folk dance, folk music etc.);
- (c) social practices, rituals and festive events (birth, circumcision, farewells to military, weddings, anniversaries, Hidrellez, The Navruz, Sema, Semah etc.);
- (d) knowledge and practices concerning nature and the universe (folk meteorology, traditional cuisines etc.)
- (e) traditional craftsmanship (pottery, wood carving, telkari, paper marbling etc).

Turkey is a party to the UNESCO Convention on Intangible Cultural Heritage.

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 8 – Cultural Heritage recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this Performance Standard aims to protect irreplaceable cultural heritage and to guide clients on protecting cultural heritage in the course of their business operations. In addition, the requirements of this Performance Standard on a project's use of cultural heritage are based in part on standards set by the Convention on Biological Diversity.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

European Convention on the Protection of the Archaeological Heritage (Revised) (Valette, 16/01-1992) - This convention is known as the Valette Convention. It sets guidelines for the funding of excavation and research work, and publication of research findings. It also deals with public access, in particular to archaeological sites, and educational actions to be undertaken to develop public awareness of the value of the archaeological heritage.

Convention Concerning the Protection of the World Cultural and Natural Heritage, 1972 - Turkey is a signatory to this Convention (The World Heritage Convention), which was approved by the General Conference of the United Nations Educational, Scientific and Cultural Organization (UNESCO), meeting in Paris from October 17th to November 21st, 1972. The signatories to this Convention have agreed "to ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage" on their territories.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have preservation of cultural heritage implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)

- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

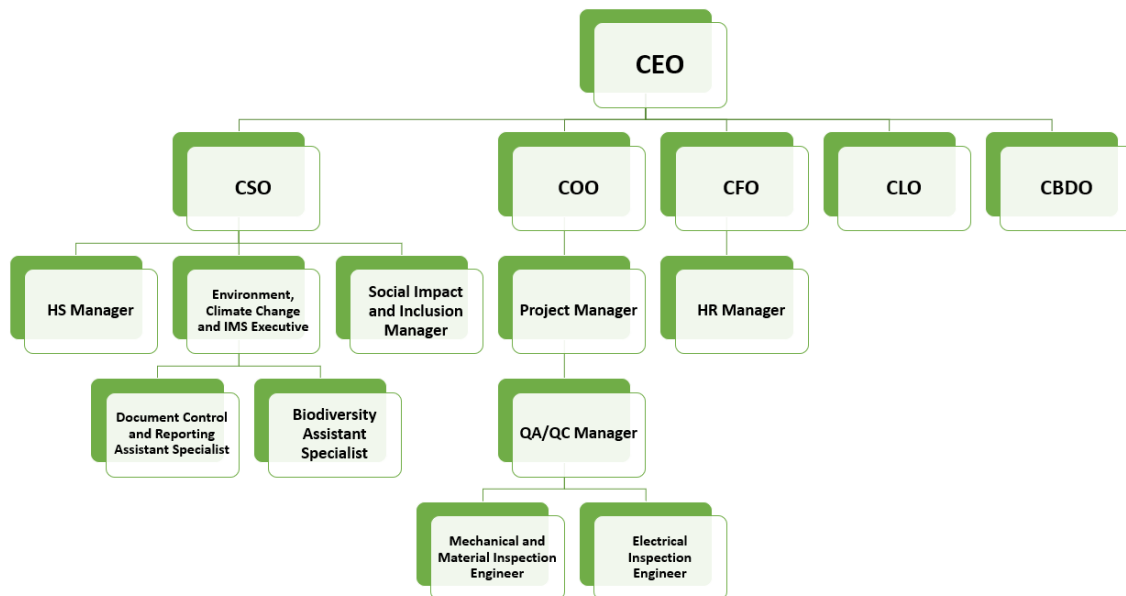


Figure 1: Organization Structure of the Kalyon Enerji

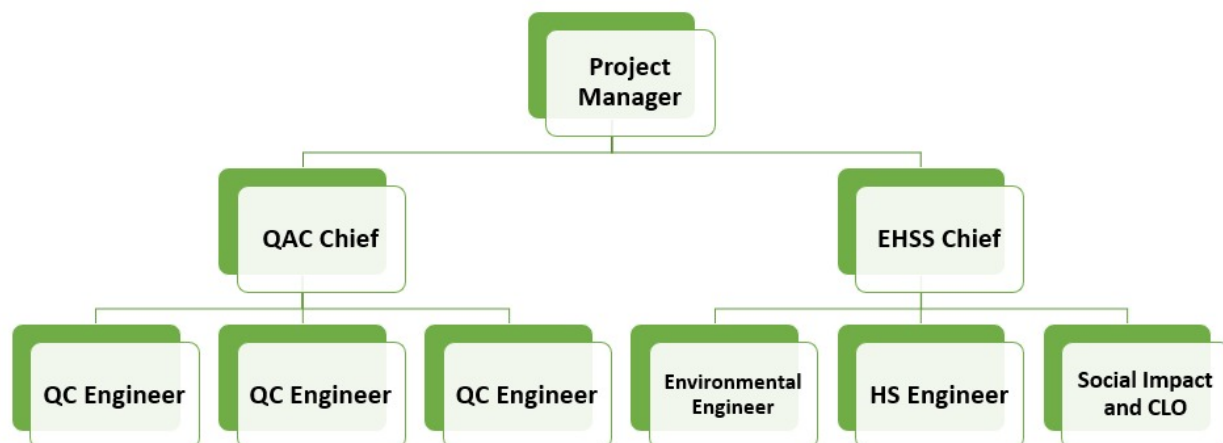


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.

Roles	Responsibilities
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this procedure for the personnel they are responsible for this Plan. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the EHSS Chief Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan.

Roles	Responsibilities
	<ul style="list-style-type: none"> • Provide staff, equipment and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> • Participate in the trainings. • Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

Chance Find Procedure given in Attachment-1 that must be followed in case of encountering a chance find is based on national legislation and provisions of international standards and best practices.

Description of the significance levels of the findings is given below. The significance of the archaeological/cultural heritage finding may vary upon the assessment of the Museum Directorate. Regardless of the level of significance, in case of a finding the construction activities shall be ceased in the field where the finding is discovered, and the findings shall be reported to the relevant museum expert. Following the completion of investigation of the relevant Museum Directorate, the necessary arrangements, such as the identification of the boundaries of the archaeological/cultural heritage asset/site (finding), its protection by taking necessary measures, notification of workers in order to prevent any physical intervention, will be implemented:

Minor Significance: This type of findings is comprised of a finding isolated from its environment or findings in notably small sizes which may be found by chance. In this case, Chance Find Procedure (Attachment-1) will be followed.

Moderate Significance: This type of findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In this case, Chance Find Procedure (Attachment-1) will be followed. In order to prevent a possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

Major Significance: This type of findings is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristics) and the construction activities must be immediately stopped, and Chance Find Procedure (Attachment-1) will be followed. This type of chance find may cover the entire construction site that the entrance and exit of the construction equipment and vehicles cannot be managed without giving any damage to the archaeological remains.

In the pre-construction period, dates of the activities, rituals etc. for local days or longer activity periods which will be planned to be held in the region should be learned through meetings with the mukhtars and local people. In case an intangible cultural is identified, following measures will be applied.

- Community will be prevented from being affected by the construction in possible customary practices that can be experienced locally.
- Mobility of the people and vehicles during the activities planned to be held in the region will not be prevented,
- Transit routes will be arranged for uninterrupted access to areas regularly visited by the public,
- Contractors and subcontractors will be trained on the code of conduct, including their approach to relations with local communities, during the employment phase and at regular intervals throughout the Project;

- Information will be provided to contractors and subcontractors on any site-specific sensitivity/issue (e.g., festival locations, dates, events, etc.) regarding intangible cultural heritage.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
CHMP-1	Site Inspection	Monitor excavation works in terms of cultural heritage	Kalyon Enerji/ EPC and its sub-contractor	Continuously during ground disturbance activities

All chance finds will be reported on the Chance Find Report Form and the Chance Find Register as per the Chance Find Procedure given in Attachment-1. The register will be kept up to date by the EPC Social Impact and Community Liaison Officer. The Chance Find Report Form will be kept in hard copy and as electronical copy. A summary of the status of chance finds will be reported to the Social Impact and Inclusion Manager of Kalyon Enerji and to the Project Manager of Kalyon Enerji monthly.

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the cultural heritage preservation practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
CHMP - KPI-1	Cultural heritage trainings completed	Kalyon Enerji/ EPC/	Monthly	100%

ID	Key Performance Indicator	Responsibility	Frequency	Target
	vs. planned	Sub-contractors		
CHMP - KPI-2	Total % of non-conformities closed within the agreed timeframe regarding cultural heritage.	Kalyon Enerji/ EPC/ Sub-contractors	Monthly	100%
CHMP - KPI-3	Total % of grievances closed within the agreed timeframe regarding cultural heritage.	Kalyon Enerji/ EPC/ Sub-contractors	Monthly	100%
CHMP - KPI-4	Total % of chance finds recorded in accordance with the Chance Find Procedure	Kalyon Enerji/ EPC/ Sub-contractors	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.

ATTACHMENT 1 – CHANCE FIND PROCEDURE

Any physical remains of past human activity, including artifacts, plant and animal remains, structural remains and soil features are defined as archaeological entities. All actions to be carried out in case of discovery of an archaeological entity, must comply with the Law on Protection of Cultural and Natural Assets, Law No. 2863, (Official Gazette date/no: 23.07.1983/18113).

In the event of discovery of an archaeological entity, the following procedure shall be implemented:

- All construction and other relevant activities in the vicinity of the chance find will be ceased by the Social impact and community liaison officer or anyone who encounters the chance find.
- A temporary buffer zone will be established around the chance find.
- Social impact and community liaison officer will contact the EHSS Chief, Project Manager and museum archaeologist immediately.
- Social impact and community liaison officer will properly secure the chance find site via flagging, no-entry signs, etc. and prevent/limit the vehicle traffic within the immediate vicinity of chance find.
- Social impact and community liaison officer will also protect the site by not moving, removing or further disturbing the chance find.
- Boundaries of discovered archaeological site coordinates will be recorded. Video records and photographs of the location and the finding will be taken.
- Social impact and community liaison officer will fill out Part A of Chance Find Form and send a copy to museum archaeologist within 24 hours. Social impact and community liaison officer will also keep a copy of the form for the Project records.
- If any human remains such as contemporary grave or graveyard will be noticed, security forces will be informed. If the remains will be determined to be recent, the local administration (village head: mukhtar, or district governor) will have the full authority.
- Further steps to be followed and proper procedures to be implemented for the management of the finding(s) (changes in the layout, conservation, preservation, restoration or salvage) will be decided and reported in writing by the Museum Directorate.
- If the museum archaeologist declares that the site is considered to be of no significance:
 - Social impact and community liaison officer will inform the EHSS Chief and Project Manager.
 - Social impact and community liaison officer will record the decision on Part B of the Chance Finds Form and send a copy to EHSS Chief and Project Manager within 24 hours. Social impact and community liaison officer will also keep a copy of the form for the Project records.
 - Following that, construction work will continue as no further action will be required.
- If the museum archaeologist declares that the site is considered to be of significance:
 - Social impact and community liaison officer will be informed by museum archaeologist about the decision on the further actions.
 - Social impact and community liaison officer will inform the EHSS Chief and Project Manager.
 - Social impact and community liaison officer Staff will record the decision on Part B of the Chance Finds Form and send a copy to EHSS Chief and Project Manager within 24 hours. Social impact and community liaison officer will also keep a copy of the form for the Project records.
 - After that, the instructions of the museum archaeologist will be followed.
 - After some field investigation, Museum Directorate will declare their decision on the significance of the site, within this regard the actions to be followed as per their decision are summarized in Table 5.

Table 4: Action to be Followed

Site with No Significance	Site with Minor Significance	Site with Major Significance
<ul style="list-style-type: none"> ✓ Social impact and community liaison officer will inform the EHSS Chief and Project Manager, ✓ Social impact and community liaison officer will record the decision in Part C of Chance Find Form within 24 hours, ✓ Social impact and community liaison officer will retain a copy of Chance Find form as a record, ✓ No further actions will be required, ✓ This step closes out the chance find procedure, <p><u>Construction activities may resume.</u></p>	<ul style="list-style-type: none"> ✓ A salvage excavation is to be completed, ✓ Museum Directorate will provide instructions, and/or supervision to Social impact and community liaison officer for salvage archaeological excavation, ✓ Social impact and community liaison officer will inform the EHSS Chief and Project Manager, ✓ Social impact and community liaison officer will conduct the salvage excavation, under the guidance of museum archaeologist (following instructions from other authorities, Kayseri Regional Board etc.), ✓ Once the excavation is completed, Social impact and community liaison officer will provide a report to EHSS Chief and Project Manager, ✓ Social impact and community liaison officer will provide a report to the Museum Directorate, ✓ Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform Social impact and community liaison officer, ✓ Social impact and community liaison officer will inform the EHSS Chief and Project Manager that no further actions are required, ✓ Social impact and community liaison officer will record the decision in Part C of Chance Find Form within 24 hours, ✓ Social impact and community liaison officer will retain a copy of Chance Find form as a record, ✓ No further actions will be required, ✓ This step closes out the chance find procedure, <p><u>Construction activities may resume.</u></p>	<ul style="list-style-type: none"> ✓ An excavation is to be completed, ✓ The site will be treated according to "Law on Protection of Cultural and Natural Assets", ✓ Museum Directorate will provide instructions, and/or supervision to Social impact and community liaison officer for salvage archaeological excavation, ✓ Social impact and community liaison officer will inform the EHSS Chief and Project Manager, ✓ Social impact and community liaison officer will conduct the salvage excavation, under the guidance of museum archaeologist (following instructions from other authorities, Kayseri Regional Board etc.), ✓ Once the excavation is completed, Social impact and community liaison officer will provide a report to EHSS Chief and Project Manager, ✓ Social impact and community liaison officer will provide a report to the Museum Directorate, ✓ Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform Social impact and community liaison officer, ✓ The site will be officially recorded and protected according to Turkish regulations, ✓ Social impact and community liaison officer will inform the EHSS Chief and Project Manager that no further actions are required, or that a relocation is required, ✓ Social impact and community liaison officer will record the decision in Part C of Chance Find Form within 24 hours, ✓ Social impact and community liaison officer will retain a copy of Chance Find form as a record, ✓ No further actions will be required, ✓ This step closes out the chance find procedure, <p><u>Construction activities may resume, or relocation will be implemented.</u></p>

APPENDIX 1 - CHANCE FIND REPORT FORM / RASLANTISAL BULUNTU RAPOR FORMU

PART A		
BÖLÜM A		
Location: <i>Mevkii</i>	Date: <i>Tarih</i>	ID:
Name of person reporting chance find: <i>Rastlantısal buluntuyu rapor eden kişinin ismi</i>		
Name of EPC employee contacted: <i>İletişime geçilen EPC çalışanı ismi</i>		
Has work been stopped in the immediate vicinity of chance find? <i>Rastlantısal buluntunun tam çevresinde iş durduruldu mu?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>		
Has been a buffer zone created to protect chance find? <i>Rastlantısal buluntuyu korumak için tampon bölge oluşturuldu mu?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>		
NOTIFICATION BİLDİRİM		
EHSS Chief is contacted <i>SGSÇ Şefi ile irtibata geçildi</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>		
Project Manager is contacted <i>Proje Müdürü ile irtibata geçildi</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>		
Social impact and community liaison officer is contacted <i>Çevre Mühendisi ile irtibata geçildi</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>		
CHANCE FIND DETAILS RASLANTISAL BULUNTU AYRINTILARI		
GPS coordinates <i>GPS koordinatları</i>	Photo record <input type="checkbox"/> Yes <input type="checkbox"/> No (HD quality – no cell phone photos) <i>Fotoğraf kaydı Evet Hayır</i> (HD kalitesinde – cep telefonu fotoğrafı değil) If not, explain why: <i>Yok ise nedenini açıklayınız</i>	

	Other records <input type="checkbox"/> Yes <input type="checkbox"/> No Specify (drawings, HD quality videos, etc.): <i>Diğer kayıtlar Evet Hayır Belirtin</i> (çizimler, HD kalite videolar, vb.)
Description of chance find: <i>Rastlantısal buluntunun tanımı</i>	
Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to closest watercourse, etc.) <i>Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın su yoluna olan mesafe, vb.)</i>	
PART B BÖLÜM B	
NOTIFICATION OF _____ ARCHAEOLOGIST OF MUSEUM DIRECTORATE _____ MÜZE MÜDÜRLÜĞÜNÜN ARKEOLOĞUNA BİLDİRİ	
Social impact and community liaison officer contacted archaeologist of museum directorate <i>Çevre Mühendisi müze müdürlüğünün arkeoloğu ile irtibata geçti.</i> Date of notification: <i>Bildirim tarihi</i> Name of archaeologist of museum directorate: <i>Müze müdürlüğünün arkeoloğunun ismi</i> Contact number of archaeologist of museum directorate: <i>Müze müdürlüğünün arkeoloğunun iletişim numarası</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>Evet Hayır</i>
DECISION OF _____ ARCHAEOLOGIST OF MUSEUM DIRECTORATE _____ MÜZE MÜDÜRLÜĞÜNÜN ARKEOLOĞUNUN KARARI	
Date of initial investigation: <i>İlk araştırma tarihi</i>	

<input type="checkbox"/> Site of no significance - Construction to proceed with no further investigation – End of chance find procedure <i>Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu.</i> Date of notice to resume work: <i>İşe başlama tarihi bildirisi</i>		<input type="checkbox"/> Site of significance - Further investigation required <i>Önemli saha – Ek araştırmagereklemektedir</i> Fill out Part C <i>Bölüm C'yi doldurun.</i>	
Name of archaeologist of museum directorate: <i>Müze müdürlüğünün arkeoloğunun ismi</i> Contact information: <i>İletişim numarası</i>			
EHSS Chief is contacted <i>SGSÇ Şefi ile irtibata geçildi</i>		<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
Project Manager is contacted <i>Proje Müdürü ile irtibata geçildi</i>		<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
Social impact and community liaison officer is contacted <i>Çevre Mühendisi ile irtibata geçildi</i>		<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
PART C BÖLÜM C			
FURTHER FIELD INVESTIGATION EK SAHA ARAŞTIRMASI			
<input type="checkbox"/> Site of no significance <i>Önemsiz saha</i>	<input type="checkbox"/> Site of minor significance <i>Az önemli saha</i>	<input type="checkbox"/> Site of major significance <i>Çok önemli saha</i>	
Describe additional work to be conducted: <i>Yapılması gereken ek işlerin tanımları</i>			
Date started: <i>Başlangıç tarihi</i>		Date completed: <i>Bitiriş tarihi</i>	
Date of notice to resume work: <i>İşe başlama tarihi bildirisi</i>			
Name of archaeologist of museum directorate: <i>Müze müdürlüğünün arkeoloğunun ismi</i> Contact information: <i>İletişim numarası</i>			
EHSS Chief is contacted <i>SGSÇ Şefi ile irtibata geçildi</i>		<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>

Project Manager is contacted <i>Proje Müdürü ile irtibata geçildi</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
Social impact and community liaison officer is contacted <i>Çevre Mühendisi ile irtibata geçildi</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>

APPENDIX 2 - CHANCE FINDS REGISTER

	CHANCE FIND REGISTER
	Reporting Period:

Total of chance find	
To date	To date

Id (*)	Date of Chance Find	Location	Chance Find Summary	Name of Authority Notified	Date Part A Completed	Date Part B Completed	Date Part C Completed	Action Taken	Status Open or Closed	Remarks
Project 1										
Project 2										
Project 3										
Project 4										

(*) Keep same ID format

APPENDIX 3 - CONTACT INFORMATION OF RELATED AUTHORITIES

Table 5: Contact Information

Name	Phone	Address
<i>Gaziantep Regional Directorate for the Protection of Cultural Assets</i>	0 (342) 230 49 97	Mücahitler Mahallesi Lojmanlar Caddesi No:1 Şehitkamil/GAZİANTEP
<i>Gaziantep Provincial Directorate of Culture and Tourism</i>	0 (342) 230 59 69	İncili Pınar, 36003. Cd. No:1 100.Yıl Atatürk Kültür Parkı İçi Valilik Arkası 27090 Şehitkamil /GAZİANTEP
<i>Gaziantep Museum Directorate</i>	0 (342) 325 27 28	Mithatpaşa Mah. Sani Konukoğlu Bulvarı Tekel Cad. Zeugma Mozaik Müzesi Şehitkamil/GAZİANTEP



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-SOC-PLN-0001

Community Health and Safety Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Community Health and Safety Management Plan (CHSMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project (“the Project”). This CHSMP sets out the requirements to provide a high level of overview for identifying and assessing the project adverse impacts on the potentially affected communities and developing protection, prevention and mitigation measures proportionate to the impacts and risks.

The plan is applicable to construction, operation and decommissioning phases of the Project. It will be reviewed at least 2 months prior to operation and updated at least 1 year prior to decommissioning.

The requirements set out in this CHSMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. (“Kalyon Enerji”) and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. (“Client”), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organisation for Economic Co-operation and Development (OECD)’s Common Approaches.

1.1. Scope

This CHSMP applies to all Project activities under the Client’s supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC, its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management of community health and safety aspects during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Aol	Area of Influence
CHSMP	Community Health and Safety Management Plan
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety, and Social
EPFI	Equator Principle Financial Institution
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principle Financial Institution
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses and approvals,
- Equator Principles (EPs) IV,
- IFC Performance Standards (PSs) and EHS Guidelines,
- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and
- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices and procedures

2.1 National Requirements

- Regulation on Environmental Impact Assessment
- Occupational Health and Safety Law No.6331 and its regulations
- Labour Law No. 4857
- Regulation on Waste Management
- Regulation on Zero Waste Management
- Regulation on Water Pollution Control
- Regulation on Assessment and Management of Air Quality
- Regulation on Control of Exhaust Gas Emission
- Regulation on Control of Industrial Air Pollution
- Regulation on Exhaust Gas Emission Control and Gasoline and Diesel Quality
- Regulation on Surface Water Quality
- Groundwater Law (No. 167)
- Regulation on Protection of Groundwater Against Pollution and Deterioration
- Regulation on the Transportation of Dangerous Goods by Road
- Traffic Law No. 2918
- Regulation on Assessment and Management of Environmental Noise
- Regulation Related to Noise Emissions by Equipment for Outdoor Use
- Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources
- Regulation on Application of Private Security Services Law
- Regulation on Sabotage Protection
- Regulation on Health and Safety Measures in Working with Chemicals
- Regulation on Health and Safety Signs
- Dust Fighting Regulation

- Communiqué on Major Accident Prevention Policy Documents

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 4 - Community Health, Safety, and Security: recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this PS addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related-activities, with particular attention to vulnerable groups.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

CDC Group, EBRD and IFC Emerging Good Practice for the Private Sector on Addressing Gender-Based Violence and Harassment (2020).

IFC Good Practice Note on Managing Contractors' E&S Performance (2017).

IFC Good Practice Handbook on Use of Security Forces: Assessing and Managing Risks and Impacts (2017)

IFC Good Practice Note on Addressing Grievances from Project-Affected Communities (2009)

IFC Handbook for Addressing Project-Induced In-Migration (2009)

IFC Introduction to Health Impact Assessment (2009)

IFC Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging

Markets (2007)

Guidance Note on Implementation of Human Rights Assessments under Eps

Voluntary Principles on Security and Human Rights.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have community health and safety implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATONAL STRUCTURE

3.1 Project Implementation Organization Chart

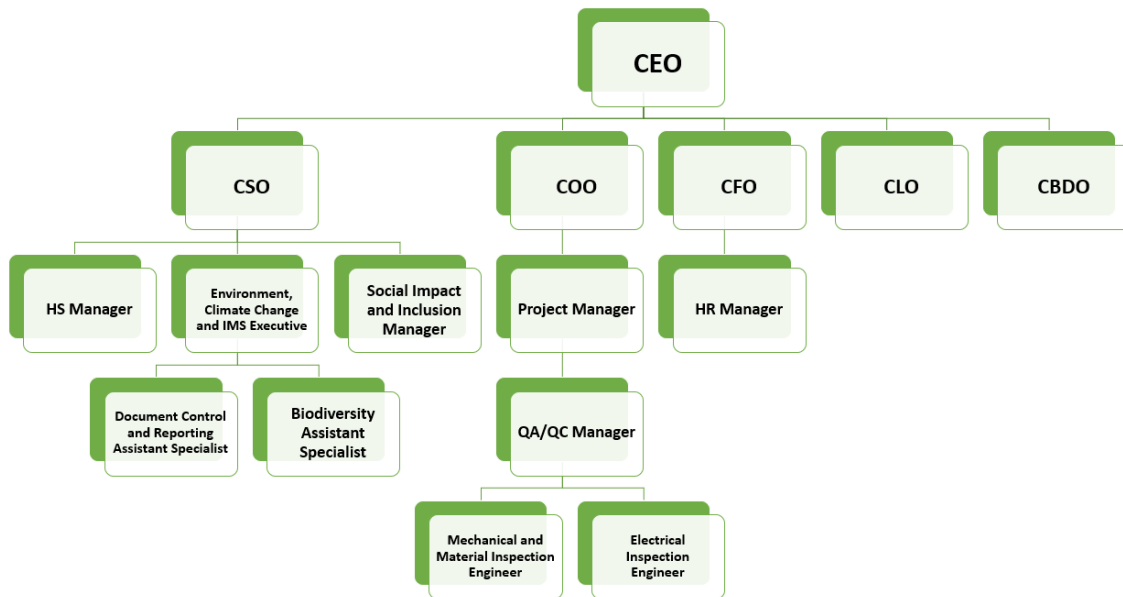


Figure 1: Organization Structure of the Kalyon Enerji

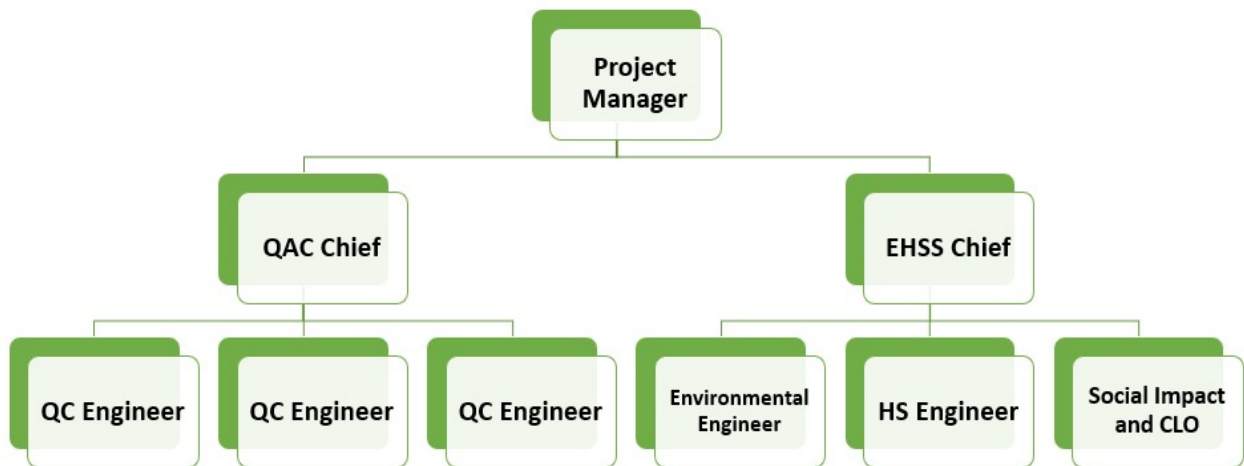


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji. Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in

Roles	Responsibilities
	collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment and training. • Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. • Organize the trainings related to this procedure for the personnel they are responsible for this Plan. • Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> • Control incoming and outgoing traffic at all times. • Report all security issues to the EHSS Chief • Involve in the investigation team for the investigation of the security incidents. • Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. • Ensure all mitigation measures and management controls are implemented properly. • Ensure that only properly trained and qualified security personnel are employed. • Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> • Develop its own procedure to fully implement this Plan. • Ensure compliance with Project standards and contractual agreements. • Ensure related non-compliances are recorded and responded to immediately. • Conduct internal audits and record identified incompliances. • Provide related trainings. • Appoint a responsible person for activities defined in this Plan. • Provide staff, equipment and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> • Participate in the trainings. • Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

The community may be exposed to potential risks of health and safety associated with hazards created though the Project construction phase and equipment, vehicles and infrastructure allocated for project use. Major directly affected community members during the Project activities are members living nearby the Project area and visitors to the site.

Key risks identified during the preliminary ESIA studies and addressed by this Plan include:

- Air Quality
- Hazardous Materials Management
- Water Resources
- Noise and Vibration

- Traffic and Road Safety
- Communicable Disease
- Emergency Preparedness and Response
- Conflict Potential and Introduction of New Security
- Labor influx/ interaction of workers and local people
- Public Access to Project Area / Work Area

The general mitigation measures outlined in the following table will have to be applied to mitigate negative impacts generated by the Project on community health and safety and to ensure compliance with Turkish regulations and international standards.

No	Issue	Possible Impact	Mitigation Measures
1	Air Quality	<p>Dust emissions to the atmosphere</p> <p>Diesel emissions from heavy equipment and trucks</p>	<ul style="list-style-type: none"> All mitigation measures given in Pollution Prevention Plan should be considered. In order to prevent dusting on the roads, irrigation and spraying will be done at certain periods. All of the vehicles to be used in the facility will run on diesel fuel, and the exhaust emissions of all vehicles will be regularly measured by authorized institutions, and it will be documented that they meet the limit values determined for exhaust emissions. Unloading and filling will be done without tossing. Loading and unloading activities will be carried out on the windward side in order to reduce the spread of dust due to the effect of the wind. The slope of the piles will be reduced to prevent dispersal by wind. The speed of the vehicles will be limited, and dust emission will be reduced. Vegetation will be done in order to prevent wind erosion in the areas where use has been completed. If planting is not possible, covering with natural or synthetic material will be applied with the method described as mulching. In order to monitor the air quality during the lifecycle of the Project, the principles and monitoring activities to be implemented in the defined Pollution Prevention Plan. Off-road travel in unpermitted areas will be restricted. Effective filters will be used and maintained in vehicle cabins to purify the air from dust and smoke. Vehicles will not be permitted to keep engines running while waiting to enter the sites or waiting on-sites. Dedicated parking areas will be established for employees' vehicles. Machinery will not be left running in periods between work or will be throttled down to a minimum.
2	Hazardous Materials Management	Transportation of the hazardous material and waste may result in toxic, fire, explosion, or other hazards.	<ul style="list-style-type: none"> Please refer to Hazardous Materials Management Plan, Waste Management Plan and Pollution Prevention Plan. <p><u>Hazardous Materials</u></p> <ul style="list-style-type: none"> Transportation of hazardous materials will be carried out by the experienced and trained personnel at the appropriate times of day (as much as possible in the daytime). Transportation will be performed at appropriate speed limits depending on the conditions of the roads and equipment to be used for transportation. Employees will use the suitable PPEs according to the properties of the hazardous material.

No	Issue	Possible Impact	Mitigation Measures
			<ul style="list-style-type: none"> ● Checklists of the vehicles will be filled in and if a deficiency is detected, this deficiency will be eliminated before the transportation. ● Vehicles and equipment performing transportation will be marked with warning signs indicating the transportation of hazardous materials and the signs suitable for the products they are carrying. ● Hazardous materials will be kept in suitable containers and checked for deformation in the containers before the commencement of loading and transportation processes. ● At the site entrance, hazardous materials will be checked upon receipt to ensure that the quantities and the types match the approved purchase order. Unapproved materials will not be accepted to enter the site. ● There will be adequate amount of spill response materials, in cases of spillage during transportation/loading. ● In case of a spillage during transportation and/or loading, the Emergency Preparedness and Response Plan will be triggered. ● During the unloading and/or loading of hazardous materials, any unauthorized persons will not be allowed to enter the area, and the area will be indicated by warning signs that hazardous material is being unloaded or loaded. ● Hazardous materials will be placed in vehicles for transportation in accordance with their hazard classes and manufacturer's instructions. <p><u>Hazardous Waste</u></p> <ul style="list-style-type: none"> ● Hazardous wastes will be transported off site when the storage on site are nears maximum storage capacity levels. ● Hazardous wastes will be securely packed and labelled prior to transportation to ensure that wastes can be transported safely to the approved disposal site without risk to those handling the waste or to the environment. ● Licensed disposal facilities will be used for transfer and disposal of hazardous wastes.
3	Water Resources	<p>Decrease in the amount of water due to water use</p> <p>Decrease in water quality due to improper discharge to ground and surface water</p>	<ul style="list-style-type: none"> ● The control measures to be implemented in the Project are detailed in the Project Waste Management Plan and Pollution Prevention Plan. ● Appropriate monitoring campaign will be established in the Project. ● Within the scope of the activity, it is committed to comply with the provisions of the Law on Groundwater and the provisions of the Regulation on the Protection of Groundwater against Pollution and Deterioration in accordance with international standards and guidelines. ● In the Project, the facilities will be built without damaging the irrigation and drinking water lines. However, in case of damage to irrigation and drinking water lines and village roads that may arise from construction, transportation activities

No	Issue	Possible Impact	Mitigation Measures
			<p>to be carried out within the scope of this Project, the damage will be covered by Kalyon Enerji, EPC and/or subcontractors where applicable.</p> <ul style="list-style-type: none"> Impacts on availability to water due to the Project will be minimized to the extent possible. Water needs of local communities will be given priority on water needs for the Project. Excavation wastes, waste materials etc. will not be left to the environment haphazardly in a way that will not pollute the environment, underground and surface waters. During the activity period, water quality will be monitored periodically as given in the Pollution Prevention Plan. Maintenance of plant or machinery will occur only in designated and paved areas, not occur in, over, or adjacent to a drain or watercourse or in areas where high-level groundwater or unconfined aquifer conditions prevail.
4	Noise and Vibration	General construction and operation noise will occur throughout the Project.	<ul style="list-style-type: none"> The control measures to be implemented in the Project are detailed in the Pollution Prevention Plan. When working with construction equipment, horns or other devices or systems that make noise will not be used unnecessarily, speed limits will be obeyed, high gear and low speed driving style will be adopted. During the land preparation, construction and operation periods, noise measurement and damage observations on buildings and roads will be made at the nearest settlement. Measurements will be carried out in the neighbourhoods in order to determine the impact of the noise arising from the construction activities of the project on the nearest sensitive receptors. Noise measurement results will be compared with the Project Standards, and in case of exceeding the limit values, additional measures such as noise barriers will be taken. Construction works performing noisy activities will be avoided to the extent possible during the night and during rest hours.
5	Traffic and Road Safety	<p>Traffic accidents occur from the vehicles to be used in the project activities</p> <p>The traffic density of the roads used by the community</p>	<ul style="list-style-type: none"> The control measures to be implemented in the Project are detailed in the Project Traffic Management Plan. The routes to be used within the scope of the Project will be determined by avoiding settlements to the extent possible. Trucks traveling to and from the site will use dedicated entrances and designated truck routes. Authorities will be notified when the oversize heavy vehicles will be required, and vehicles will be escorted Communicate transport routes and predicted schedule to communities. Local communities will be informed of planned road closures or disruptions with at least 72 hours' notice through official communication and signs.

No	Issue	Possible Impact	Mitigation Measures
		<p>resulting from the project activities</p> <p>Disruption of frequently used roads</p>	<ul style="list-style-type: none"> ● Identify and install all necessary warning signage on public roads and within the site working areas. ● Develop and implement a Traffic Training Programme for all employees. ● Prepare and deliver driver safety training for drivers and operators. ● Develop and implement a Road Safety Awareness Programme for local communities. ● Maintain delivery logs to manage the day-to-day entry of vehicles onto the site. ● Deploy “spotters” for plant and machinery operating in building construction areas. ● Require contractors to develop appropriate Emergency Response Plans for off-site activities. ● Set zero limit for alcoholic beverages and illegal drugs. ● Drivers will be ensured to comply with traffic rules and speed limits. ● Vehicles will not be loaded with more than their carrying capacity, and transportation will be carried out in accordance with the speed limits on the roads. ● Roads will not be damaged during the transportation of materials during all phases of the project. Frequently used roads will be inspected on a regular basis to ensure that they are not damaged. In case of damage, the damage borne by Kalyon Enerji, EPC, subcontractors and suppliers will be covered within the framework of the protocol to be signed with the relevant authority where applicable. ● Transport of Project staff will be organized so to reduce the number of vehicles needed (i.e., use of busses/minibuses and collective means of transport) to the extent possible.
6	Communicable Disease	The population increase may lead infectious diseases, Sexually Transmitted Diseases (STD) and especially spread of Covid-19 in the project Aol. Increased potential for communicable diseases is would also be expected especially during construction	<ul style="list-style-type: none"> ● Pre-employment health screening and regular medical checks of workers as per Turkish regulatory requirements. ● Support local public health campaigns. ● Awareness-raising on health lifestyles for workers and community level training. ● Regular cleaning principles to be applied in line with the Camp Site and Offsite Accommodation Management Plan. ● Engagement with health authorities and obtaining statistics to determine if the prevalence of communicable diseases is increasing due to the Project. ● Obtain health statics according to relevant legislations on a monthly basis to understand Project’ impact on communicable diseases.

No	Issue	Possible Impact	Mitigation Measures
		phase.	
7	Emergency Preparedness and Response	Any emergency case	<ul style="list-style-type: none"> The control measures to be implemented in the Project are detailed in the Emergency Preparedness and Response Plan and Pollution Prevention Plan. In case of emergency, communication procedures detailed in the Emergency Preparedness and Response Plan will be followed. The emergency response teams will be established in line with the regulatory requirements. Regular emergency drills will be carried out in the Project, considering the potential scenarios consisting of impacts and/or communication with the nearby communities. During operation Kalyon Enerji and during construction EPC and its subcontractors will implement accident and incident reporting and investigation procedure to analyse accidents to define necessary control measures to prevent reoccurrences. Access will be provided to the community members of the information necessary to understand the nature of the possible effect of an accident and an opportunity to contribute effectively.
8	Security	Conflict Potential and Introduction of New Security	<ul style="list-style-type: none"> During operation Kalyon Enerji and during construction EPC and its subcontractors will retain direct or contracted workers to provide security to safeguard the personnel and the property. The control measures to be implemented in the Project are detailed in the Security Management Plan. Criminal records of the security personnel applicant will be checked and the applicants with no criminal records will be employed. Security personnel will be trained adequately in their roles and responsibilities, the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities and the applicable law. Security personnel will have training in the conflict resolution and cultural sensitivity. Security patrols will be done at regular intervals. The borders of the Project site including access road rehabilitation will be identified and marked with warning signs. Entry and removal of equipment/material will be controlled at the control points, the movement of equipment/material will be allowed after the approval of relevant department. During operation Kalyon Enerji and during construction EPC and its subcontractors will implement grievance mechanism and consider and, where appropriate, investigate all allegations of unlawful or abusive acts of security personnel, take

No	Issue	Possible Impact	Mitigation Measures
			action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to public authorities.
9	Labour influx/ interaction of workers and local people	The project may face an influx of non-local labour and working conditions issues as skilled laborers might not be available around the project area	<ul style="list-style-type: none"> ● Local employment will be prioritized. ● Most of the in-migrated employees will be accommodated in the campsite to minimize the influx effect on local communities where applicable. ● Health screening of all workers will be performed prior to beginning of work and on a periodic basis. ● Training of employees to minimize the social impacts on local communities. Provide cultural awareness training as an on-boarding requirement to all non-local workers, and in particularly foreign workers, in order to prevent cultural clashes with regards to dress codes, food consumption, etc. ● Training of employees to minimize the impacts on resources use and environment. ● Training of workers on Health & Safety aspects and on communicable diseases, particularly sexually transmittable diseases. ● Monitoring number of in-migrated employees and their accommodation information ● Monitoring influx impacts on communities through public consultations in line with Stakeholder Engagement Plan ● During the monitoring process of the grievance mechanism, the impacts related to population influx will be analysed, and required actions will be applied.
10	Public Access to Project Area / Work Area	Physical hazards	<ul style="list-style-type: none"> ● Please refer to Security Management Plan. ● Continue to implement measures to discourage unauthorized entry onto the Project area. ● Hiring security presence and security personnel. ● Provide security cameras. ● Ensure that those providing security services are adequately trained in the use of force and appropriate conduct toward workers and Affected Communities. ● Visitor admission is required sign-in at the security gate. ● All visitors will be provided with site brochure explaining the Project area, site rules and what to do in case of emergencies. ● All visitors will be provided with appropriate personal protective equipment and site-specific control measures will be defined.

No	Issue	Possible Impact	Mitigation Measures
			<ul style="list-style-type: none">● Visitors will not be allowed to enter areas where they are not authorized. The Project area will be displayed with appropriate safety signs.● Recording the license plates of the visitors' vehicles.● All personnel entering the Office/Construction Site will have an ID badge

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily tool-boxes.

Special training and necessary advanced training are to be provided to the security personnel (including the human rights and the use of force), drivers and key personnel involved in activities that are conducted off-site, e.g., along the transport route.

Drivers and operators will be trained in defensive driving techniques, and this will be mandatory for all Kalyon Enerji and contractor workers who will drive, working at the site.

Various community-level social trainings will be provided, including road safety and cultural heritage awareness training. The training will target vulnerable groups such as children, woman and disabled. Social training will be organized by during operation Kalyon Enerji and during construction EPC.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a monthly basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Frequency
CHSMP-1	Air Quality	Please refer to Pollution Prevention Plan	
CHSMP-2	Hazardous Materials Management	Please refer to Hazardous Materials Management Plan and Pollution Prevention Plan.	
CHSMP-3	Water Resources	Please refer to Waste Management Plan and Pollution Prevention Plan.	
CHSMP-4	Noise and Vibration	Please refer to Pollution Prevention Plan.	
CHSMP-5	Traffic and Road Safety	Please refer to Traffic Management Plan.	Continuous

ID	Topic	Method	Frequency
CHSMP-6	Communicable Diseases	Monitor statistical trend in the communicable disease's changes.	Monthly
CHSMP-7	Traffic and Road Safety	Statistical trend of community members involved traffic incidents.	Monthly
CHSMP-8	Emergency Preparedness and Response	Statistical trend of emergency cases and H&S incidents involving community members	Monthly
CHSMP-9	Security	Statistical trend of security incidents in the Project	Monthly
CHSMP-10	Health, Safety, Environment and Security	Statistical trend of health, safety, environment and security related grievances raised by the community members.	Monthly
CHSMP-11	Emergency Preparedness and Response	Please refer to Emergency Preparedness and Response Plan	
CHSMP-12	Conflict Potential and Introduction of New Security	Please refer to Security Management Plan.	Continuous
CHSMP-13	Labour influx/ interaction of workers and local people	Via grievances	Continuous
CHSMP-14	Public Access to Project Area / Work Area	Please refer to Security Management Plan.	

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the community health and safety practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
CHSMP-KPI-1	% of compliance of air quality, noise, vibration, soil quality, effluent wastewater, potable water measurements with the Project Standards	Kalyon Enerji/ EPC and its subcontractors	Monthly	70%
CHSMP-KPI-2	Trainings related to community health and safety completed vs. planned	Kalyon Enerji/ EPC and its subcontractors	Monthly	100%

ID	Key Performance Indicator	Responsibility	Frequency	Target
CHSMP-KPI-3	Total % of non-conformities related with community health and safety issues closed within the agreed timeframe	Kalyon Enerji/ EPC and its subcontractors	Monthly	100%
CHSMP-KPI-4	Total % of grievances related with community health and safety issues closed within the agreed timeframe	Kalyon Enerji/ EPC and its subcontractors	Monthly	100%
CHSMP-KPI-5	Number/statistical trend of community -related traffic incidents/accident (Total Recordable Incident Rate (TRIR), Lost Time Incident Rate (LTIR), Incident Frequency Ratio (IFR), Incident Severity Ratio (ISR)).	Kalyon Enerji/ EPC and its subcontractor	Monthly	Minimize & Target zero per year
CHSMP-KPI-6	Number of communicable diseases	Kalyon Enerji/ EPC and its subcontractor	Annually	No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per year.
CHSMP-KPI-7	Number of emergency cases and H&S incidents involving community members (Total Recordable Incident Rate (TRIR), Lost Time Incident Rate (LTIR), Incident Frequency Ratio (IFR), Incident Severity Ratio (ISR)).	Kalyon Enerji/ EPC and its subcontractor	Monthly	Minimize & Target zero per year
CHSMP-KPI-8	Number of security incidents in the Project (Total Recordable Incident Rate (TRIR), Lost Time Incident Rate (LTIR), Incident Frequency Ratio (IFR), Incident Severity Ratio (ISR)).	Kalyon Enerji/ EPC and its subcontractor	Monthly	Minimize & Target zero per year
CHSMP-KPI-9	Number of community awareness training sessions on e.g., traffic safety, health, emergencies.	EPC and its subcontractor	At least 1 campaign per year	Number of community awareness training sessions on e.g., traffic safety, health, emergencies.

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-GEN-PLN-0001

Contractor Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Contractor Management Plan (CMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This CMP sets out the requirements for the management of environmental and social impacts, particularly concerning the contractors' activities during the implementation of the Project.

The Plan applies to the construction, operation and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this CMP are applied to all activities throughout the lifecycle of the Project, especially those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This CMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and all employees. The Client is the main responsible for the implementation of this Plan. Contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed under Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is;

- To define the scope and applicable interphases for the management of contractors during all project activities,
- To define project standards in terms of components,
- To define responsibilities, commitments, operating procedures and instructions for the implementation of this Management Plan,
- To manage components and monitor Project performance,
- To define training requirements, monitoring measures and Key Performance Indicators.

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
CMP	Contractor Management Plan
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety and Social
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GPN	Good Practice Note
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
SDS	Safety Data Sheet
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices and procedures.

2.1 National Requirements

There is not any national standard or regulation that addresses contractor management. Standards related to procurement are described in Public Tender Act (Law No: 4734).

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

As established in IFC PS 1 "Assessment and management of Environmental and Social Risks and Impacts", paragraphs 2 and 14, IFC clients are responsible for managing their contractors' environmental and social performance: "Contractors retained by, or acting on behalf of the client(s), are considered to be under the direct control of the client and not considered third parties. . ." and the environmental and social management ". . . programs may apply broadly across the client's organization, including contractors and primary suppliers over which the organization has control or influence . . .".

Performance Standard 2 recognizes that the pursuit of economic growth through employment creation and income generation should be accompanied by the protection of the fundamental rights of workers. For any business, the workforce is a valuable asset, and a sound worker-management relationship is a key ingredient in the sustainability of a company.

It is the client's responsibility to comply with IFC PSs on Environmental and Social Sustainability; relevant EHS Guidelines' requirements; loan agreement commitments; ESIA requirements; local laws and regulations; and permits and standards; and to ensure that all contractors providing any type of services to the Client duly follow these requirements throughout the duration of the contract.

The Good Practice Note (GPN) on managing Contractor's environmental and social performance is aimed at helping clients implement sound, consistent, and effective approaches in compliance with IFC requirements, to manage the environmental and social performance of their contractors, subcontractors, and other third parties

working for the project.

The GPN provides practical guidance to clients and contractors on the process of prequalification, solicitation, evaluation, contracting, and procurement to ensure adequate environmental, health and safety and social management during construction, operation, and demobilization activities. Finally, it provides recommendations on how to manage project performance during the different phases of the services being provided by contractors (i.e., from mobilization to construction, operations, and maintenance) and how to monitor and report on contractor performance effectively.

IFC requires clients to adopt and implement an ESMS for “managing environmental and social risks and impacts in a structured way on an ongoing basis” (PS1, paragraph 1) and to ensure that contractors and subcontractors similarly adopt and implement an ESMS. The GPN is intended to support clients in ensuring contractor compliance with this requirement, support the alignment of the client’s and contractor’s ESMSs, and ensure that contractors have an ESMS suitable for the business activities being carried out by each contractor.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have contractor management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

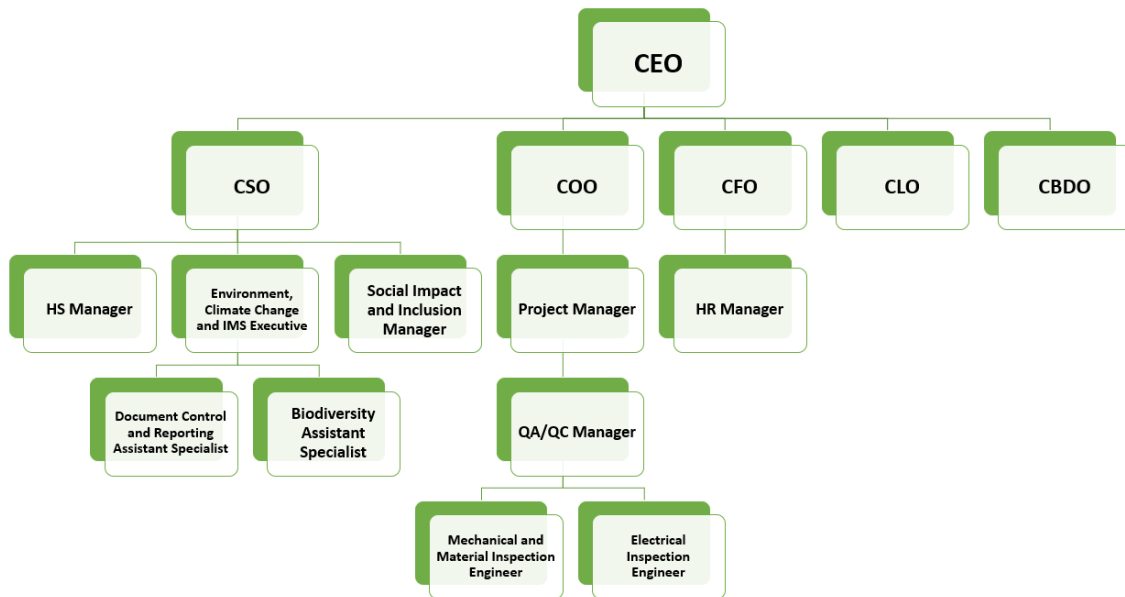


Figure 1: Organization Structure of the Kalyon Enerji

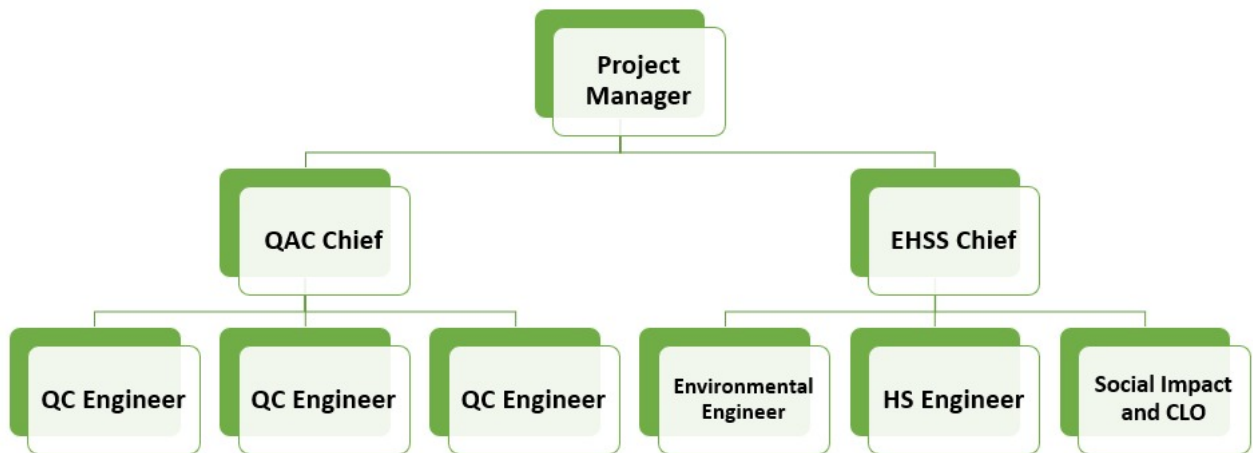


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organizational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is complaint with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> Prepare, manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and task are trained on this Plan. Conduct/organize periodic audits. Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and other occasions as required by legislation.

Roles	Responsibilities
	<ul style="list-style-type: none"> Organize the training related to this Plan for the personnel they are responsible for. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the -EHSS Chief. Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions, and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related training. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the training. Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

The key stages of the contractor engagement and management process that will be applied by Kalyon Enerji are as follows.

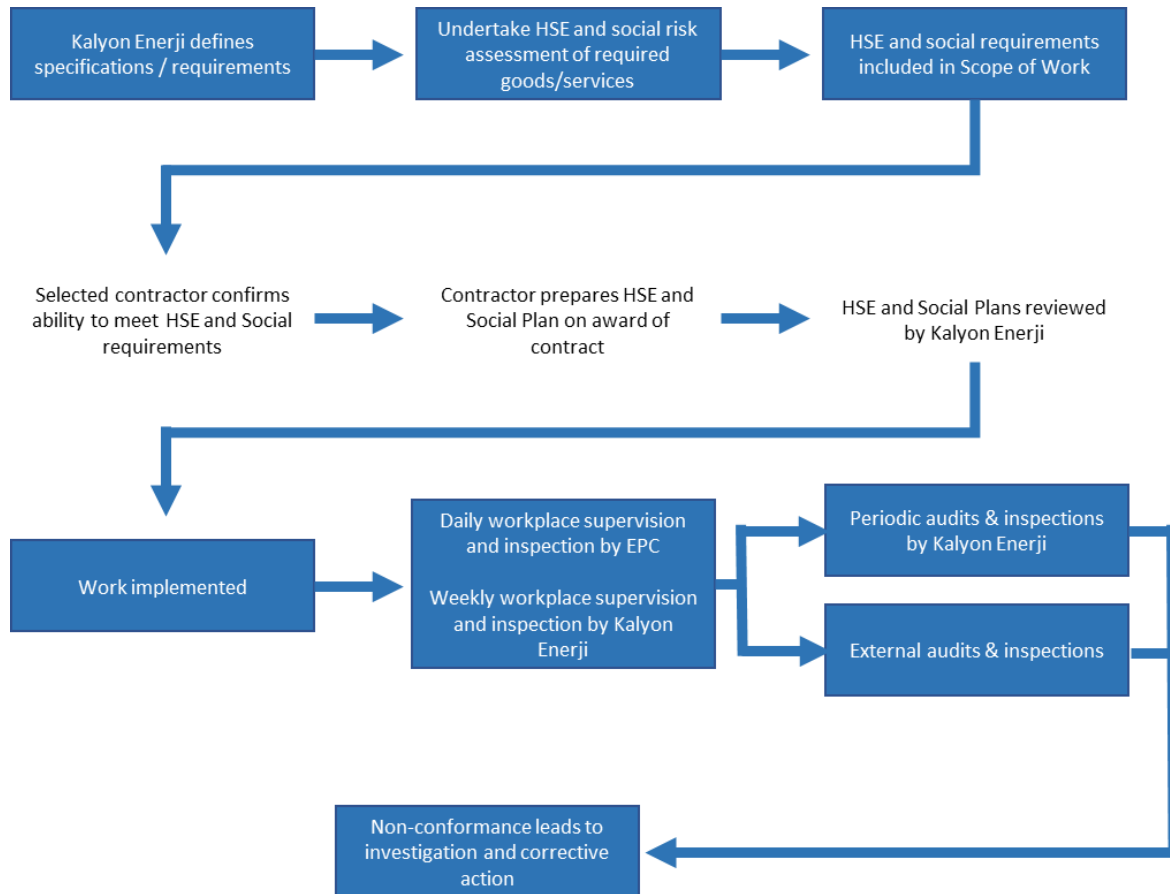


Figure 3: Contractor Management Procedure

4.1 Before the Contractor Selection

The process will identify potential risks associated with the planned procurement of materials, equipment, services and labour etc. and evaluate the contractor's existing EHSS and labour management practices with the Project Standards including IFC PSs as stated in Section 2, and the contractor's capacity to perform the required work and materials/services following the stipulated standards. Only those contractors who can guarantee that the selection criteria are met will be chosen.

- Kalyon Enerji will determine the requirements and the specifications of the work clearly and in detail before announcing the contractor.
- The specification should have a significant impact not only on the cost and level of service, but also on the risks faced by landlords, workers, road users, facility operators, etc., and the systems that must be implemented, managed and adhered to.
- A Scope of Work should be prepared. A Scope of Work is a form that provides a detailed explanation of work that will be performed as part of a contract. Scope of work is important because it helps to ensure that the parties involved are on the same page regarding expectations related to the project. Tasks are numbered and there is space for an adequate description of the tasks, the required equipment and services, and who is responsible for the cost of the project.
- A well-crafted Scope of Work, sometimes referred to as a statement of work, should include the following components:
 - Objectives: What is the purpose of the project? What are its goals? The project objectives should be clear, concise, and easy to identify.

- Deliverables (and Milestones): What end result should be attained? What are the deadlines or delivery dates for each phase of the project? Deliverables may be measured by phase, period of time, the date of the project's completion, etc.
- Variables: Variables include cost, schedule, resources, and the technology required for each phase of the project, from initiation to completion. Each variable should set clear limits on inclusions and exclusions.
- Requirements: Requirements include the things necessary to support the project.
- Tasks: These include a catalogue of individual action items required to complete each phase of the project. Tasks should be broken down into a work breakdown structure.
- Inclusions: This includes anything included in the project in the Scope of Work.
- Exclusions: This includes anything not included or specifically stated in the Scope of Work.
- Relevant health and safety factors are an important consideration when specifying any Scope of Work. They will not be the only factor to be taken into account, but they must be included.

4.2 Selection of Contractors

- Procurement and EHSS departments will assess the applicants to determine their alignment with the requirements and procedures covered in Kalyon Enerji's Management System. To ensure that all contractors comply with the Project Standards, the selection process will ensure that the selected contractor has its subcontractor selection process in place.
- A procedure for contractor re-evaluation will be included in the selection process. If the Project Standards or the Scope of Work change significantly, a re-evaluation will be conducted.
- The selection process will be documented, and records will be kept. All documentation obtained from this process will be in line with the Personal Data Protection Law.
- The process for selection of contractors should include the following items but not limited to:
 - Assessment of their existing environment, health and safety practices
 - Assessment of workforce capacity for the proposed task
 - Assessment of previous and existing customers and projects
 - Assessment of existing Human Resources policies and practices
 - Assessment of schedule, labour force and budget proposed for the task
 - Capacity of tools, materials and technology to be used for completion of tasks.
- Licenses and necessary registrations, the existing management system of the contractor and the performance results of the management system will be taken into consideration during the preliminary qualification and selection processes of contractors. Contractors are required to document their management system and prove their existence along with the documentation required to ensure compliance with Project policies and procedures. These include, but are not limited to, those below:
 - Incident/accident statistics
 - Showing a system that complies with all relevant legal requirements
 - Responsibilities and the systems defined for the work environment (for example, procedures and work instructions)

- Training and qualification records
 - Inspection and audit records
 - The feedback process for employee complaints and demands
 - Judgment, improvement and restriction notification records, if any
- Management will not award contracts until the preliminary qualification process is complete.
- Contractors that do not demonstrate sufficient levels of competency in the various pre-qualification checklist categories will be informed on their deficiencies and how to correct them for future consideration.

4.3 After the Contractor Selection

- Following the selection of contractors, the agreed-upon Work Contract will ensure that the contractor complies with Project Standards including IFC PSs through contractual conditions.
- A clause clearly emphasizing that the contractor in question is fully responsible for compliance with Project Standards will be included in the Work Contract.
- The Work Contract will include the following general clauses, but not limited to:
 - The contractor should have a structure in place with sufficient EHSS support and resources.
 - The contractor should specify the minimum amount of time management shall spend in the field, monitoring, supervising and influencing work activities.
 - The contractor should document and communicate responsibilities and accountabilities (including EHSS responsibilities and accountabilities) for all personnel and relevant stakeholders.
 - The contractor should establish a system that recognizes, reinforces and rewards desired behaviours and outstanding EHSS performance.
 - The contractor should have a documented approach to consequence management that includes a fair and just process.
 - The contractor should communicate to its employees that they have the right and ability to stop work or refuse to work in situations where they believe that the work would expose them, other people, or the environment to a risk of harm.
- All HSE, social and labour management requirements that the contractors must meet will be clearly stated in the Work Contract (environmental, social, human resources, human rights, grievance mechanism and stakeholder engagement, cultural heritage, scheduling, budget, etc. constraints) with special emphasis on OHS rules defined by the Project.
- The contracts will include conditions on stopping works in case of continuous violation of the HSE and OHS rules defined by the Project.
- Penalties to be applied in cases of poor EHSS performance of the contractors will be evaluated periodically by Kalyon Enerji's audits and will be annexed to Work Contract. Accordingly, fines will be applied depending on the incompliance and if no corrective actions will be taken by the contractors, Kalyon Enerji will have the right to terminate the Work Contract.

4.4 Further Measures

- Kalyon Enerji will provide the contractors with all necessary technical assistance to ensure that Project Standards are met in all works.
- Contractors will be responsible for assisting their subcontractors in meeting the Project Standards' requirements. Contractors will notify Kalyon Enerji in case of any noncompliance with HSE, social and labour management practices by subcontractors. Contractors will ensure adequate corrective/mitigative actions are taken by their subcontractors.
- An official OHS Committee will be established considering the number of contractors as per the Regulation on Occupational Health and Safety Committees and will conduct monthly meetings. Contractors will participate in these meetings.
- Contractors will develop HSE Management Plans (which can include an Emergency Action Plan) and these plans will be reviewed by Kalyon Enerji.
- Contractors will prepare monthly reports to inform Kalyon Enerji of the Project's EHSS performance, and social and labour issues, and mitigation/corrective steps will be proposed for any potential incompliance.
- Kalyon Enerji will analyze these reports and, if necessary, work with each linked contractor to further develop the proposed measures.
- The performance of any implemented actions will be included in future monthly reports. Where an incompliance requires immediate action, contractors will be responsible for the implementation of timely and appropriate measures and report the results to Kalyon Enerji.
- The Project's internal grievance procedure will be accessible to all contractor and subcontractor workers.
- Kalyon Enerji will review the grievance records to verify that the grievances are addressed adequately and to Kalyon Enerji's satisfaction.
- Contractors' contracted and non-employee workers will have access to the grievance system as well.
- Contractors will be responsible for providing all required documents to Kalyon Enerji if requested by Kalyon Enerji.

4.5 Execution of Works

Some of the tools for the management of the contractors during the execution of works at the site can be listed, but not limited to, as:

- All equipment used by contractors and their subcontractors will be subject to supervision including occupational health and safety and emergency equipment status. Contractor and their subcontractors are required to submit documents proving the fitness of their equipment such as licenses, legal examination records, mandatory motor insurance and traffic insurance. Examinations will also be conducted by maintenance personnel at the site.
- Properties of all substances that pose a serious risk for OHS and HSE performance (including by-products and waste) must be sufficiently understood, certified, and integrated into business procedures. Legally suitable Safety Data Sheet forms (SDS) for these substances (including products) must be present before their delivery and use.
- The use of equipment supplied by Kalyon Enerji will be monitored to ensure that they are being used

only for intended purposes.

- Contractors, workers and Project representatives will hold routine coordination meetings regarding transportation and use of materials that require OHS/Environment/Community Liaison coordination among other departments at the site, coordinate future works regarding other activities, and review past performance.
- Hazardous materials approved for use at the site (preferably based on an inventory system) must be recorded. This record will be maintained and used as a reference to control purchasing and provision for the use of new materials. All hazardous materials brought by contractors must be included in these records or assessed.
- Contractors must have a procedure regarding procurement, storage, distribution and transportation of all equipment and materials that are in accordance with the Project Standard and in proportion with the risk being assessed.
- Contractors must have a procedure regarding the management of disposal of excess/used materials, chemical substances, hazardous waste and equipment in a safe and approved manner in accordance with Project Standards. This procedure must define actions aiming at minimizing any type of obligation that may arise in the future.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Monitoring will be done through monthly reports of contractors, daily and weekly workplace inspections and regular audits.

Contractors' monthly reporting will be based on their records (e.g., grievance records, waste statistics, accident/incident statistics, amounts of waste generated and delivered for transport, permitting issues, HSE measurements and so on) as well as daily and weekly site inspections.

Kalyon Enerji will undertake weekly workplace inspections by operational area superintendents/supervisors covering a broad range of operational aspects, including community health safety and security issues as

appropriate to activities outside the fence line. On the other hand, daily workplace inspections will be undertaken by the EPC.

Contractors will prepare plans for the management of Occupational Health and Safety/Environment/Community Relations and define the process for monitoring their performance in these plans.

Kalyon Enerji will be in charge of auditing all contractor activities regularly (quarterly during construction). The audit will aim to identify the level of compliance with the Project Standards and potential non-compliances, as well as any problem areas with regard to contractor management. The results of these audits will be provided to the top management.

Corrective and/or improving actions will be developed and implemented based on monitoring, inspection and audit results. These actions will be monitored and reported on as well.

Kalyon Enerji will conduct a contractor audit/satisfaction survey at the end of their contract to ensure that all obligations arising from the contract have been fulfilled.

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
CMP-1	Implementation of Contractor Selection Process	The process for selection of contractors will be implemented (for the details please refer to Section 4)	Kalyon Enerji/ EPC and its sub-contractor	Prior to contract
CMP-2	Contractor compliance with Project Standards – EHSS	<p>The contractors will report periodically as follows to ensure continuity of compliance with the Project EHSS Management System. The documentation will include but not be limited to:</p> <ul style="list-style-type: none"> Records of Toolbox Talks Minutes Non-Conformity and Preventive/Corrective Actions Registry Inspection Reports Incident Investigation and Reporting Form Waste amounts/types/handling methods (recycling or disposal) Environmental & OHS measurements, if any Natural resource consumption amounts (including water, fuel, electricity, etc.) 	Kalyon Enerji/ EPC and its sub-contractor Kalyon Enerji/ EPC and its sub-contractor	Monthly
CMP-3	Contractor compliance with Project Standards – Social and Labor	Contractor will report periodically as follows to ensure continuity of compliance with the Project Social Management System. The	Kalyon Enerji/ EPC and its sub-contractor	Monthly

ID	Topic	Method	Responsibility	Frequency
		documentation will include but not be limited to: <ul style="list-style-type: none"> Grievance records (Internal and external) OHS Committee meeting records Local employment statistics Local procurement statistics Training statistics Goodwill to stakeholders 		
CMP-4	Contractor Compliance with Project Standards	Kalyon Enerji will review the monthly reports to be prepared by contractors.	Kalyon Enerji/ EPC and its sub-contractor	Monthly
CMP-5	Audits	Site visits Documentation control Actions implemented	Kalyon Enerji/ EPC and its sub-contractor	Quarterly
CMP-6	Inspections	Kalyon Enerji and EPC will perform regular inspections on contractors' sites.	Kalyon Enerji/ EPC and its sub-contractor	Daily for EPC Weekly for Kalyon Enerji
CMP-7	Satisfaction survey	Where feasible, a satisfaction survey will be conducted by Kalyon Enerji after the completion of the work.	Kalyon Enerji/ EPC and its sub-contractor	After the completion of the work
CMP-8	Grievance	The statistical trend of community grievances received regarding contractor management will be recorded.	Kalyon Enerji/ EPC and its sub-contractor	Monthly
CMP-9	Incidents	The statistical trend of contractors' incidents about EHSS	Kalyon Enerji	Monthly

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the contractor management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
CMP-KPI-1	Number of reported contractors' incidents about EHSS.	Kalyon Enerji/ EPC and its sub-contractor	Monthly	Minimize & Target zero per year
CMP-KPI-2	Number of recorded community grievances related to contractors and the number of completed corrective actions	Kalyon Enerji/ EPC and its sub-contractor	Monthly	Minimize and achieve continuous improvement in the number of reported

ID	Key Performance Indicator	Responsibility	Frequency	Target
	associated with grievances.			grievances
<i>CMP-KPI-3</i>	Audits completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>CMP-KPI-4</i>	Total % of Contractor management related non-conformities closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>CMP-KPI-5</i>	Training completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>CMP-KPI-6</i>	Total % of Contractor management related grievances closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

This Management Plan provides a summary of the contractor management processes that will be implemented by Kalyon Enerji, it does not supersede the conditions detailed in individual contracts.

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-GEN-PLN-0002

Camp Site and Offsite Accommodation Management Plan

28 July 2023

Revision Tracking

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1 INTRODUCTION

This document is the Camp Site and Offsite Accommodation Management Plan (CSOAMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This CSOAMP sets out the framework for campsites and offsite management including the transport systems provided, general living facilities, rooms/dormitories facilities, sanitary facilities, canteen and cooking facilities, food safety, medical facilities, and leisure/social facilities during the Project life cycle.

The plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this CSOAMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This CSOAMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and all employees. The Client is the main responsible for the implementation of this Plan. EPC, its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management of campsites and offsite accommodations during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
CSOAMP	Camp Site and Offsite Accommodation Management Plan
EHS	Environment, Health, and Safety
EHSS	Environment Health, Safety and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principle Financial Institution
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FIFO	First in-First Out
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- Equator Principles (EPs) IV,

- IFC Performance Standards (PSs) and EHS Guidelines,
- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and
- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices, and procedures

2.1 National Requirements

- Regulation on Environmental Impact Assessment
- Regulation on Environmental Permit and License
- Republic of Türkiye Constitution- No: 2709, 17863, 18/10/1982
- Labour Law- No: 4857, 25134, 10/06/2003
- Occupational Health and Safety Law – No: 6331, 28339, 30/06/2012
- Regulation on Occupational Health and Safety at Construction Works, 28786, 05/10/2013
- Regulation on Health and Safety Measures to be Taken in Workplace and its premises, 28710, 17/07/2013.
- Food Hygiene Regulation, 28145, 17/12/2011

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 2 Labor and Working Conditions recognizes that through a constructive worker-management relationship, and by treating the workers fairly and providing them with safe and healthy working conditions, clients may create tangible benefits, such as enhancement of the efficiency and productivity of their operations.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific

examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

Workers' accommodation: processes and standards - A guidance note by IFC and the EBRD: this guidance note addresses the processes and standards that should be applied to the provision of workers' accommodation in relation to projects funded by the EBRD or IFC.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have workers' accommodation implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

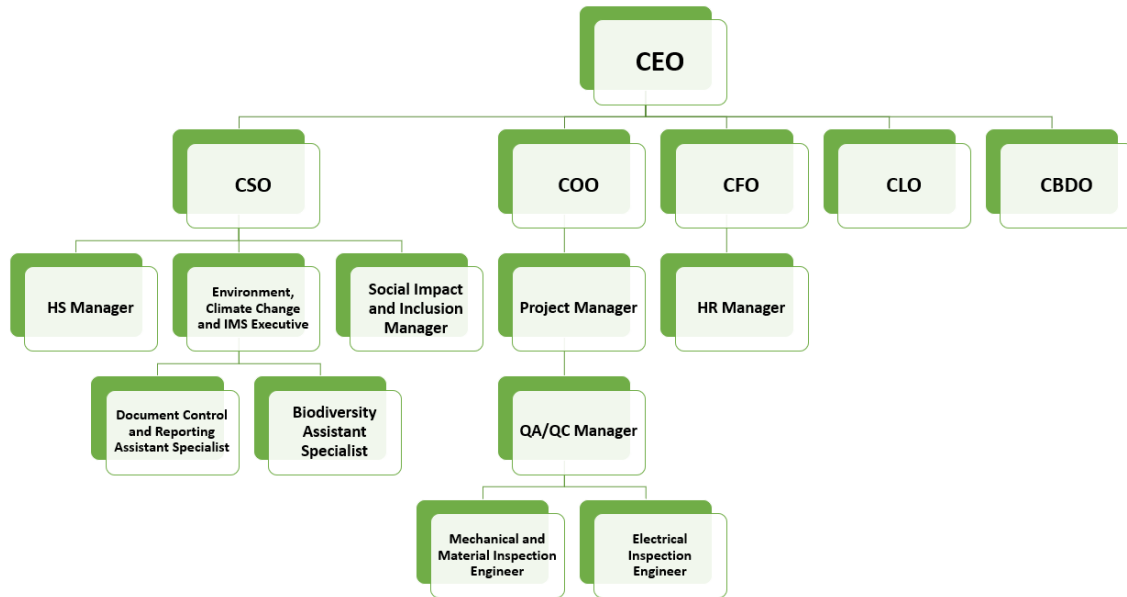


Figure 1: Organization Structure of the Kalyon Enerji

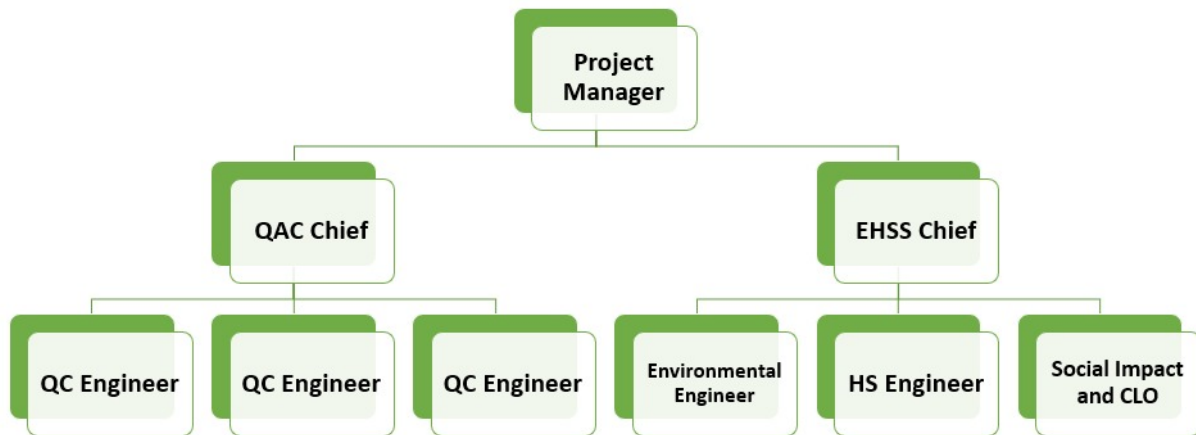


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organizational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements.

Roles	Responsibilities
	<ul style="list-style-type: none"> Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions.

Roles	Responsibilities
	<ul style="list-style-type: none"> Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this procedure for the personnel they are responsible for this Plan. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the Camp Manager Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Conduct effective implementation of this plan. Implement internal audit checklist (Appendix A), perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Implement internal grievance redress mechanism in collaboration with human resource specialist and social impact and stakeholder engagement specialist.
<i>Occupational Physician</i>	<ul style="list-style-type: none"> Participate in regular inspection/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Conducts first response to the injured person in case of emergency and safely transfer to the hospital if required.

4 MANAGEMENT & MITIGATION REQUIREMENTS

Management measures to be applied within the campsites and offsite accommodations during the Project works are listed below. In addition to these, the mitigation measures provided in relevant management plans such as waste management plans and pollution prevention plans will be implemented to manage camp operations.

4.1 Non-Discrimination and Equal Opportunity

Accommodation will be provided in a way consistent with the principles of non-discrimination and equal

opportunities. Workers' gender, religion, culture, and social background will be respected. Workers will also be informed about their rights and obligations.

4.2 Workers' Camp Site

During the workers' accommodation design and planning process, the Annex I Checklist Checklist on Workers' Accommodation provided in the IFC - EBRD Guiding Notes on Workers' Accommodation (also given in Appendix-A of this Plan) will be followed to ensure that the document's requirements are met.

Accommodation will be fully contained with meals, entertainment, medical clinic. By this way interaction of the workers with local communities will be prevented as much as possible. The potential negative results of the interaction with the community residents will be explained to workers via social induction/trainings.

To avoid safety hazards and to protect workers from diseases/illnesses resulting from humidity, bad/stagnant water (or lack of water), cold, the spread of fungus, proliferation of insects or rodents, epidemic and infectious diseases and to maintain a good level of morale among workers, good standards in living facilities will be ensured. Living facilities will be built using materials of adequate quantity and quality and will be kept in good repair, clean, and free from rubbish and other refuse. The detailed list of standards to be met in the campsites is provided in the following sections. In addition, the following plans will have to be prepared for the campsite:

- A fire response plan will be prepared specific to the campsite.
- An earthing and lightning rod plan will be prepared specifically for the campsite.
- A waste management plan will be prepared including the campsite.
- A campsite emergency evacuation plan will be prepared and the details of emergency exit doors, the width of means of egress, and emergency lighting will be indicated on the plan.
- Vehicle and pedestrian roads will be differentiated, speed limits will be identified, and sufficient parking areas will be planned on the site.
- A camp management organization will be established, and an organization chart will be prepared.
- A campsite risk assessment will be conducted.
- A cleaning instruction will be drawn up for all facilities and outdoor areas present within the campsite.
- A pest management plan will be prepared and the measures to be taken will be identified.
- An occupational Hygiene Management Plan need to be prepared for each camp as per the project.

Location

The location of the campsite is crucial to avoid exposure to wind, fire, floods, and other natural hazards. The campsite will be located and designed so as not to be affected by the environmental or operational impacts of the working area but must be close enough so that workers do not spend too much time commuting. In the case that the campsite is not close enough to walk to the working area, transportation will be provided. The following standards will be met in campsites:

- Campsite will be located on a point which can be protected from flood and other natural disasters.
- The campsite will have an appropriate distance from residential areas.
- Transport from the campsite to the work site will be safe and free of charge.

General Living Facilities

- The living facilities will be built with adequate materials, kept in good repair, and kept clean and free from rubbish and other refuse.
- The living facilities will be adequately drained to avoid the accumulation of stagnant water.
- Heating, air-conditioning, and ventilation will be appropriate for the climatic conditions and provide workers with a comfortable and healthy environment to rest and spend their spare time.
- Both natural and artificial lighting will be provided and maintained in living facilities. It is best practice that the window area represents not less than 5% to 10% of the floor area. Emergency lighting will be provided.
- Hot water will be provided appropriately on the campsite.
- Access to an adequate and convenient supply of free potable water will always be available to workers. Depending on the climate, weather conditions and accommodation standards, 80 to 180 litres per person per day will be available.
- Necessary measures will be taken to enable workers' access to a sufficient amount of free, hygienic drinkable and usable water on camp and work sites. Drinking water meets national/local or WHO drinking water standards. Drinking water quality will be regularly monitored (please refer to Pollution Prevention Plan). Drinking water samples will be sent for analysis periodically and the results of analysis will be shared with all workers.
- All tanks used for the storage of drinking water will be constructed and covered to prevent water stored therein from becoming polluted or contaminated.
- Wastewater, sewage, food, and any other waste materials will be adequately discharged and disposed of.
- Specific containers for waste collection will be provided and emptied regularly. Standards range from providing an adequate number of waste containers to providing leakproof, non-absorbent, rust and corrosion-resistant containers protected from insects and rodents.
- Pest extermination, vector control and disinfection will be carried out throughout the living facilities in compliance with local requirements and/or good practices. Where warranted, pest and vector monitoring will be performed regularly.
- An appointed person with adequate background and experience will be in charge of managing the workers' accommodation.
- A suitable and sufficient number of emergency response equipment including fire response and fire detection systems will be provided at the camp sites. Emergency muster points will be designated, and periodic maintenance of all equipment will be ensured.
- Storage of chemicals and the areas allocated for this purpose on the campsite will be indicated in detail within the plan.
- Smoking areas will be identified on the campsite; smoking will be allowed only in these areas.
- Fundamental rules to be followed within the campsite will be drawn up and shared with workers.
- Shopping facilities will be set up to meet the daily needs of the workers at the campsite.
- Opinion - suggestion boxes and cards will be placed available, in line with the indications of the Workers'

Grievance Redress Mechanism.

- Bulletin boards will be used within the campsite to share information with workers.
- A camp electrician will be employed, and measures will be taken against exposure to electric shock.
- All spaces posing fall hazards within the campsite will be physically covered and put under protection.
- All the necessary measures will be taken against slip, trip and fall hazards on the campsite.
- Necessary measures will be taken against snow and ice accumulation on the roofs.
- An appropriate anchorage point will be made available to prevent fall from height in case it becomes necessary to climb on a roof. It will be ensured that there will be appropriate lifelines and anchorage points on the roofs.
- Necessary measures will be taken to prevent the provision and use of alcohol and drugs within the campsite.

Room/dormitory facilities

- Rooms/dormitories will be kept in good condition.
- Rooms/dormitories will be aired and cleaned at regular intervals.
- Rooms/dormitories will be built with easily cleanable flooring material.
- Sanitary facilities will be located within the same buildings and provided separately for men and women.
- Density standards will be expressed either in terms of minimal volume per resident or minimal floor space. Usual standards range from 10 to 12.5 cubic meters (volume) or 4 to 5.5 square meters (surface).
- A minimum ceiling height of 2.10 meters will be provided.
- In collective rooms, which will be minimized, to provide workers with some privacy, only a reasonable number of workers will be allowed to share the same room. Standards range from 2 to 8 workers.
- All doors and windows will be lockable and provided with mosquito screens where conditions warrant.
- There will be mobile partitions or curtains to ensure privacy.
- Every resident will be provided with adequate furniture such as a table, a chair, a mirror, and a bedside light.
- Separate sleeping areas will be provided for men and women, except in family accommodation.
- Irrespective of whether workers are supposed to keep their facilities clean, it will be the responsibility of the accommodation manager to ensure that rooms/dormitories and sanitary facilities will be in good condition.
- A separate bed for each worker will be provided.
- There will be a minimum space between beds of 1 meter.
- Double-deck bunks are not advisable for fire safety and hygiene reasons, and their use will be minimized. Where they are used, there must be enough clear space between the lower and upper bunk of the bed. Standards range from 0.7 to 1.10 meters.
- Triple-deck bunks are prohibited. Double bunk beds will be provided with a railing to prevent falling out

of bed and a ladder for easy access.

- Each worker will be provided with a comfortable mattress, pillow, cover, and clean bedding.
- Bed linen will be washed frequently and applied with repellents and disinfectants where conditions warrant (malaria).
- Facilities for the storage of personal belongings for workers will be provided. Standards vary from providing an individual cupboard for each worker to providing 475-litre big lockers and a 1-metre shelf unit.
- Separate storage for work boots and other personal protection equipment, as well as drying/airing areas, may need to be provided depending on conditions.

Sanitary and toilet facilities

- Sanitary and toilet facilities will be constructed of materials that are easily cleanable.
- Sanitary and toilet facilities will be cleaned frequently and kept in working condition.
- Sanitary and toilet facilities will be designed to provide workers with adequate privacy, including ceiling-to-floor partitions and lockable doors.
- Sanitary and toilet facilities will not be shared between men and women, except in family accommodation.
- An adequate number of toilets will be provided to workers. Standards range from 1 unit for 15 persons to 1 unit for 6 persons. For urinals, the usual standards are 1 unit to 15 persons.
- Toilet facilities will be conveniently located and easily accessible. Standards range from 30 to 60 meters from rooms/dormitories. Toilet rooms shall be located to be accessible without any individual passing through any sleeping room. In addition, all toilet rooms will be well-lit, have good ventilation or external windows, have sufficient hand wash basins and be conveniently located. Toilets and other sanitary facilities will be in the same building as rooms and dormitories.
- Shower/bathroom flooring will be made of anti-slip hard washable materials.
- An adequate number of handwash facilities will be provided to workers. Standards range from 1 unit for every 15 persons to 1 unit for 6 workers. Handwash facilities will consist of a tap and a basin, soap and hygienic means of drying hands.
- An adequate number of shower/bathroom facilities will be provided to workers. Standards range from 1 unit for 15 persons to 1 unit for 6 persons.
- Showers/bathrooms will be conveniently located.
- Shower/bathroom facilities will be provided with an adequate supply of cold and hot running water.

Kitchen and dining halls facilities

- Walls will be made of smooth and light-coloured materials that will be waterproof, washable and have a flat surface and a form not allowing habitation of pests and there will be no cracks on the wall.
- Ceilings will always be monitored against condensation, dripping and mold growth and will be periodically cleaned.
- Floors will be made of waterproof materials which do not allow fractures, cracks, or slippage and which are washable and suitable for cleaning and disinfection, and floors will have a slope which allows the

accumulated water to run through outlets.

- Joints of walls and floors will be in the rounded form or in a form which will provide hygiene and prevent dust accumulation.
- The lighting level in the food preparation, distribution (serving) and storage areas will be sufficient and equivalent to daylight. Light bulbs found in the lighting systems will be guarded against breaking.
- Gas leakage alarms (detectors) and gas shut-off systems (solenoid valves) will be installed in the areas where gas will be used in food preparation departments in case of any leakage. Gas leakage safety valve will be present on all the burners.
- Connection hoses between gas lines and burners will be heat resistant, dielectric (undular) and steel cord hoses (in compliance with TS EN 14800 standard).
- As regards the gas installation, the gas will be shut off and a leakage test will be conducted if any sign such as a smell or a noise is detected in a manner to lead to a suspicion of leakage.
- Connections between burners and cylinders and gas lines will consist of copper fittings.
- According to the requirement of the product and operation, a mechanical and/or natural ventilation system will be provided for heat control, and humidity control, for preventing the formation of dust and changing the polluted air, and a grill or another guard made of a non-deforming material will be placed on the ventilation outlets.
- The ventilation system will be equipped with filters and the filters in the system will be replaced at the intervals specified by the manufacturer.
- No animal will be kept by any means in the food preparation, distribution (serving) and food storage areas and their neighbourhoods.
- The drainage system will be made for the intended purpose so that the risk of infection will be eliminated, and the wastes will be drained from polluted areas to clean areas when drainage canals are open.
- The liquid waste system of the cafeteria will have the feature to resist corrosion, it will be structured in such a way as to provide easy cleaning and maintenance and will have the capacity to meet the quantity of the container and liquid waste.
- Solid and liquid wastes will be stored in such a way as to prevent any infection as well as any odour through meals and foodstuffs and will be disposed of according to the waste legislation. Materials, tools and equipment used for the storage and transfer of solid waste will be made of materials which are disposable or easy to wash and clean and disinfectable, will be tagged and stored in places which do not interfere with the production process and will not be used in the works which are concerned with the production of food. In accordance with the waste codes, there will be a sufficient number of waste containers that are labelled and coloured.
- Liquid wastes will be transferred to sewage or, where no sewage is available, to cesspits through a closed system.
- Vegetable waste oils (food and frying oils) will be prevented from entering the sewage system by the installation of oil traps on the washing units, will be transported to the vegetable waste oil collection unit near the cafeteria and will be stored there and will be enabled to be disposed of or recycled in accordance with the environmental legislation.

- Windows and similar open areas will be made in a way to not allow contamination, windowsills will not be used as shelves, and windows will be protected against the mixing of glass pieces with food products as a result of broken glass windows in the production area.
- Doors will be made of liquid-repellent materials and will have a smooth surface and self-closing feature.
- A sufficient number of first aid cabinets and materials will be available in the food preparation, distribution (serving) areas and the storeroom.
- Meals will be prepared on the same day as the day of serving and as close to the time of serving as possible and will be transferred to the water bath to maintain their heat. The temperature of the water bath will be in the range of 55°C and 65°C.
- Foods which need to be consumed cold will be stored at a temperature under 4°C.
- Water will be drinkable, in compliance with the Turkish food legislation, in a sufficient quantity and will be made available continuously.
- Ice to be used in contact with food will comply with the Turkish food legislation, is made of drinkable water and will be stored and carried within the workplace according to the hygiene rules.
- Steam used on surfaces which are in contact with food or in direct contact with substances and materials which are in contact with food will comply with the Turkish food legislation and will be made of drinkable water.
- Water used for steam generation, cooling, fire extinguishing purposes and other similar purposes will not be allowed to contact with food and will be carried through completely separate lines; those lines will be marked with different colours according to the specified standards and will not return to the system carrying drinking water.
- All the tools, equipment and technical equipment will be resistant to heat, steam, acid, alkali, salt, etc., non-contaminating for food, suitable for disinfection and furnished with polished assembly points, and protective and preventive maintenance will be performed regularly and will be taken on record.
- The design and layout of tools and equipment will not cause damage to the personnel and will be protected for safety.
- Materials which are not easy to clean, and which are easy to deform such as processed wood will not be used except where the use of those materials is necessary.
- Doors, windows, and other parts of food storerooms will have equipment suitable for preventing the entrance of any kind of pests.
- Ceilings and roofs over the storerooms will be insulated against leakage, seepage, and temperature changes.
- The durability of safety doors and gaskets of steam ovens and cookers will be continuously checked, and the doors will be opened when the pressure and heat decrease to values not causing harm to prevent the steam accumulated inside from posing harm to personnel after baking/cooking.
- As for gas-fueled devices, valves, flame nozzles and connection hoses will be checked before each use.
- Valves of gas-fueled devices will be closed after each use.
- The oil to be used in deep fryers will have not been used for making other meals before, and extra oil will not be added to the fryer if the oil level declines. The used oil will be disposed of, and frying will be

performed using fresh oil.

- All the electrical devices will be in off mode and de-energized during the cleaning operation, and they will be cleaned without any water contact on electrical equipment.
- There will be no materials or elevation differences which may cause a trip and fall on the ground.
- As regards stoves and other burners, the compressed gas cylinders will be placed in a vertical position outside the working area in the cafeterias where flammable and compressed gases such as LPG, LNG, CNG, etc. will be used while compressed gas cylinders will be placed in a covered (locked) cage in the areas having a sufficient degree of air circulation. Smoking, open fire and any act which may lead to sparks will be forbidden in these areas. Gas leakage alarms (detectors) will be installed on the cylinders which are placed in the areas where a sufficient degree of air circulation is not available.
- Manometers will be provided on the compressed gas cylinders to display pressure values inside the cylinder.
- Workers who are identified or suspected to have a disease or symptoms of a disease (such as jaundice, diarrhoea, vomiting, fever, sore throat, nasal, eye or ear discharge, etc.) which can be carried through food will not be allowed to enter the food storage area, kitchen, and cafeteria.

Storage, conservation, and preparation of food

- Processed and unprocessed foods, replacement tools and equipment, and cleaning and disinfection materials will be stored in separate places from each other.
- Chemical substances will be stored in an area separate from food preparation and distribution (serving) departments, and necessary labelling and tagging will be used in storage areas, and excess chemical substances will not be kept available in the areas of use.
- Food products will bear expiration dates, and the expiration (consumption) date of each product will be checked before use. Foods, raw materials, other substances, and materials in contact with foods or food ingredients which do not comply with Turkish legislation will not be used. Additives and flavours will be preserved in their original packaging. The first in-First Out (FIFO) principle shall be applied.
- Attention will be paid that there will not be any tears or holes on the packaging of products in nylon and plastic packaging and vacuumed products, and the products with busted or torn packaging and the products scattered on the floor will not be used.
- Canned products will not have dust, and, if possible, products in plastic packaging will be preferred.
- The products which do not give sufficient information about food for meat and milk products and the products without a production permit from the Turkish Ministry of Agriculture and Forestry Affairs will be avoided from use, and this permit will be required for the products to be procured for the facility, and they will be taken on record.
- Perishable food like milk and milk products as well as meat and meat products will be brought to the facility in refrigerated vehicles.
- Foods will be piled up on the shelves or plastic pallets which do not contact the floor in the storeroom.
- Foods will be separated into groups according to the dates of purchase and will be used according to those dates and their order of priority.
- Frozen foods which are already thawed will not be accepted and they will not be used after being refrozen.

- Witness samples of at least 150 grams will be taken from all the meals daily, the date of collection will be labelled on the samples and the samples will be stored at +4°C for 72 hours.
- Witness samples taken from foodstuffs which are introduced for sale and consumption as frozen will be stored in deep freeze for 72 hours.
- There should be a quarantine area for food that exceeds the expiry date, if required.
- Food preparation areas will not be used as storerooms, food will not be kept in the kitchen for a long time before the food preparation stage and will be taken out of the storeroom just before use. Especially perishable (easy to go stale) products will be taken out and used in small amounts.
- Food preparation and food storage areas will always be kept clean against waste and garbage dumps, water accumulations which may cause contamination and against environments which may cause habitation of pests.
- Food storerooms will be of a suitable size according to the business capacity.
- Food will be stored in such a way as to not affect each other and each other's features badly.
- Vegetable fridges, meat fridges and preparation cabinets will be separated from each other in cold storage rooms.
- Cooked and raw products placed in the cold storage rooms will be stored in separate places and will be covered with cling film.
- Product piling will not be carried out under the motors of cold storage rooms.
- Plastic pallets will be placed under the products and kept in shock coolers so that products will not contact with the floor, and the products will be arranged with space in between to allow air circulation.
- Thermometers and, where necessary, hygrometers will be made available in food storerooms, and display indicators will be present to enable continuous monitoring of heat and moisture values in the areas where the food products which are perishable and easy to stale in bad conditions are especially stored and the values will be recorded twice a day.
- Closure/doors of cold storage rooms will be able to be opened from the inside.

Medical facilities

- Several first aid kits adequate for the number of residents are available.
- First aid kits are adequately stocked. Where possible a 24/7 first aid service/facility is available.
- An adequate number of staff/workers will be trained to provide first aid.
- Where possible and depending on the medical infrastructures existing in the community, other medical facilities will be provided (nurse rooms, dental care, minor surgery).

Leisure, social and telecommunication facilities

- Basic collective social/rest spaces will be provided to workers. Standards range from providing workers with multipurpose halls to providing designated areas for radio, TV, and cinema.
- Recreational facilities will be provided.
- Workers will be provided with dedicated places for religious observance.

- Workers will have access to public phones at affordable/ public prices (that is, not inflated).
- Communication systems such as internet connection will be provided at an affordable or free cost.

Pest control

- Pest control will be carried out regularly within the program, there will be an internal settlement plan for all the feeding and physical measure points, and it will always be kept under control. For traps, electric fly traps and physical measures, regular cleaning and maintenance activities will be performed and will be taken on record.
- Appropriate labels bearing warnings about toxic effects and use of pesticides or other substances which may jeopardize human health will be attached to the substances, the substances will be stored in the lockable chambers or closets used only for this purpose, and they will be transferred and used by the trained personnel.
- In pest control, the pesticides which are permitted by the relevant authorities will be used for the intended purpose and in an appropriate manner to not harm general public health, toxic pesticides will be used outside the food preparation, distribution and storage areas.
- Doors and windows will have the feature to prevent flies, insects and other pests from entering in, and in case of using cages for long term projects which requires longer accommodation duration. They will be fine mesh cages which are easy to clean and detachable and will be maintained and cleaned periodically.

Cleaning of facilities and items

- Cleaning and disinfection will be performed regularly within the program, hygiene control programs will be hung on the relevant parts of the workplace or kept on file so that the cleaning and disinfection operations are taken on record.
- The section where dishes and utensils used in the preparation and distribution of foods will be cleaned (dishwashing area) will be separated from food preparation, distribution areas and food storerooms.
- In the dishwashing area, there will be enough dishwashers according to the size of the facility and dishes will be washed in the machine as much as possible.
- The washing temperature of the dishwashers must be at least 60 °C while the rinsing temperature is over 80 °C.
- For dishes which need to be washed by hand, the detergents, chemicals and/or disinfectants permitted by the competent authorities will be used. Cleaning and disinfection products will be clearly identified by labelling, will be stored in separate places and will be kept at a distance to avoid contamination in the kitchen.
- Measures will be taken to prevent food from being contaminated during the cleaning and disinfection of the facility, materials, tools and equipment using water, detergents, disinfectants and their solutions.
- The materials, tools, equipment, and floors will be dried as quickly as possible after the cleaning process, and the equipment used in the cleaning process will not be worn out or contaminated, and separate equipment will be used for cleaning floors and materials.
- A sufficient number of lid garbage bins which are easy to clean, and which are separated according to the type of waste will be made available as well as garbage bags.

- There will be water available in the required temperature range (not higher than 45 °C) in dishwashing areas, the dishes will be washed using necessarily hot water, and disinfection practice will be performed.
- All the washed kitchen utensils will be checked whether any stain is left after the washing process and before the next use.
- Cleaned kitchen utensils and dirty kitchen utensils will be kept in separate places, and the clean items will not be put on the floor.
- Microbiological analysis will be performed on the prepared meals and foods at certain intervals and those will be taken on record.
- The tables in the dining halls, the tableware (salt cellar, napkin holder, etc.), chairs, floors, walls, and ceilings will always be kept clean and will be cleaned after each meal.
- Cloths and other materials used for cleaning purposes will be clean and will not leave residues on the surface.
- Water dispensers (if used) will be disinfected at regular intervals in line with the manufacturer's instructions.

Security

Security of the workers and their property will be ensured. 24x7 security shall be provided. Accommodation camps will also be illuminated for security reasons. A Security Manager will be appointed who will review the security requirements, arrangements, potential threats, and the conformity of the existing control measures periodically. A security control point will be ensured at the camp areas as required and accompanied by approved security personnel.

4.3 Workers' Offsite Accommodation

During the workers' accommodation planning process, the related items of the Annex I Checklist on Workers' Accommodation provided in the IFC - EBRD Guiding Notes on Workers' Accommodation (also given in Appendix-A of this Plan) will be followed to ensure that the document's requirements are met (for the related items, please refer to below).

To avoid safety hazards and to protect workers from diseases/illnesses resulting from humidity, bad/stagnant water (or lack of water), cold, the spread of the fungus, and proliferation of insects or rodents, and to maintain a good level of morale among workers, good standards in living facilities will be ensured. A list of standards to be met (albeit not exhaustive) for the offsite accommodation is presented below. Specific requirements for houses and hotels/dormitories are described in the following sections.

- Offsite accommodation places will be equipped with adequate heating, cooling, and ventilation systems.
- Wastewater, sewage and other wastes will be disposed of according to national legislation.
- Workers will have access to an adequate amount of free potable water for drinking and hygiene purposes. Drinking water will meet national drinking water standards. Drinking water quality will be regularly monitored.
- Offsite accommodation places will be selected on a point which can be protected from flood and other natural disasters.
- Access from offsite accommodation places to the work site will be safe and free of charge. Where possible, living facilities are located within a reasonable distance from the worksite.

- Hot and cold water will be provided appropriately on the offsite accommodation places.
- Natural and artificial lighting will be provided. All facilities will be equipped with an emergency lighting system.
- A sufficient number of curtains will be kept available.
- A sufficient number of tables, cabinets, chairs, mirrors and table lamps will be provided.
- The use of triple bunk beds is prohibited. Double bunk beds will be provided with a railing to prevent falling out of bed and a ladder for easy access.
- Bed, sheet, quilt, pillow, and bed linen will be provided for every worker.
- All offsite accommodation places will have a fire detector and fire extinguisher tubes.
- For facilities located in hot weather zones, adequate ventilation and/or air conditioning systems are provided.
- Specific containers for rubbish collection are provided.
- All doors and windows will be lockable and provided with mosquito screens where conditions warrant.
- If possible, accommodation will be located close to the hospital.
- In each house or dormitory/hotel, at least 2 workers with first aid certificates will be accommodated. First aid kits are adequately stocked.
- Basic collective social/rest spaces are provided to workers. Standards range from providing workers with multipurpose halls to providing designated areas for radio, TV, and cinema.
- Workers will be provided with easy access to the telephone and Internet.
- Offsite accommodation places will not be selected at the locations where the cell phone has no signal reception.
- The contact information of workers and their relatives and the health information of workers staying offsite will be recorded in a database. The record rule for workers staying in dormitories or hotels will be room by room and for workers staying in houses will be house by house.
- An appointed person with adequate background and experience is in charge of managing the workers' offsite accommodation. There will be at least one audit per month.
- Accommodation fees will be paid regularly by the contractors and the receipts will be shared with Kalyon Enerji
- Guidance on the detrimental effects of the abuse of alcohol and drugs and other potentially harmful substances and the risk and concerns relating to HIV/AIDS and other health risk-related activities will be provided to workers. It is best practice to develop a clear policy on this issue.
- In case of conflicts between workers themselves, workers will have the possibility of easily accessing a fair conflict resolution mechanism.

Houses

- A comprehensive assessment of the local housing market will be conducted and the different types of housing available in the surrounding communities will be identified.

- Men and women will be allowed to stay in separate houses, apart from families.
- It will be recorded which workers go to work with the service and which workers go to work with their own cars.
- Depending on the size of the houses, a certain number of workers will be allowed to stay in each house. It is recommended that a maximum of 2 workers be accommodated in each room.
- Outsourcing of home cleaning services is recommended. Where not appropriate, cleaning is the responsibility of the workers staying in the homes and planning for the division of labour is recommended.

Hotels

- Density standards are expressed either in terms of minimal volume per resident or minimal floor space. Usual standards range from 10 to 12.5 cubic metres (volume) or 4 to 5.5 square metres (surface).
- A minimum ceiling height of 2.10 metres will be provided.
- In collective rooms, which are minimised, to provide workers with some privacy, only a reasonable number of workers will be allowed to share the same room. Standards range from 2 to 8 workers.
- Separate storage for work boots and other personal protection equipment, as well as drying/airing areas, will be provided depending on conditions.
- Appropriate signs for emergencies will be placed if they are not available.
- Grievance boxes will be placed, and grievances will be collected in the audits.
- Pest control will be carried out if necessary.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

Kitchen and dining hall personnel will receive specific hygiene training from authorized institutions.

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
CSOAMP-1	Audit	Audit of accommodation camps and off-site accommodations in accordance with IFC/EBRD workers' accommodation guideline	Kalyon Enerji	Monthly
CSOAMP-2	Offsite Accommodation Receipts	The payment receipts will be shared with Kalyon Enerji by contractors.	EPC and its sub-contractor	Monthly
CSOAMP-3	Food Quality	Conduct food quality analysis	EPC and its sub-contractor	As in ISO 22000 Food Safety Management certifications in the food provider supply chain, if any or Monthly

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the campsite and offsite accommodation practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
CSOAMP-KPI-1	Inspections/Audits completed vs. planned	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
CSOAMP-KPI-2	Campsite trainings completed vs. planned	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
CSOAMP-KPI-3	Total % of campsite and offsite accommodation related non-conformities closed within the agreed timeframe	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
CSOAMP-KPI-4	Total % of campsite and offsite accommodation related grievances closed within the agreed timeframe	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project

Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.

APPENDIX A – CAMPSITE CHECKLIST

General Regulatory Framework				
	Y	N	N/A	Comment
Have the international/national/local regulatory frameworks been reviewed?				
Are mandatory provisions on workers' accommodation identified?				
Assessing the need for workers' accommodation				
Availability of the workforce	Y	N	N/A	Comment
Has there been an assessment of workers' availability in the neighbouring communities?				
Has there been an assessment of the skills and competencies of the local workforce and how do those skills and competencies fit the project's need?				
Has there been an assessment of the possibility of training a local workforce in order to fulfil the project's needs?				
Availability of housing	Y	N	N/A	Comment
Has there been a comprehensive assessment of the different type of housing available in the surrounding communities prior to building any workers' accommodation?				
For a larger project: is that assessment included in the Environmental and Social Impact Assessment?				
Has there been an assessment of the impact on the communities of using existing housing opportunities?				
Have measures to mitigate adverse impacts on the local housing market been identified and included in the Environmental and Social Action Plan (ESAP) or other relevant action plan?				

Assessing impacts of workers' accommodation on communities				
	Y	N	N/A	Comment
Has a community impact assessment been carried out as part of the Environmental and Social Assessment of the overall project with a view to mitigate the negative impacts of the workers' accommodation on the surrounding communities and to enhance the positive ones?				
Have the potential health and safety impacts and consequences of land acquisition and involuntary resettlement occurring during the construction phase of the workers' accommodation been included in the assessment?				
Have the impacts of workers' accommodation on community infrastructures, services and facilities been included in the assessment?				
Have the impacts on local community's businesses and local employment been included in the assessment?				
Have general impacts of workers' accommodation on communities' health, (notably the increased risk of road accidents and of communicable diseases), and community social cohesion been included in the assessment?				
Does the assessment include appropriate mitigation measures to address any adverse impacts identified?				
Types of workers' accommodation				
	Y	N	N/A	Comment
Has consideration been given to provision of family accommodation?				
Are individual accommodations comprising bedrooms, sanitary and cooking facilities provided as part of the family accommodation?				
Are adequate nursery/school facilities provided?				
Is special attention paid to providing adequate safety for children?				

Standards for workers' accommodation				
National/local standards	Y	N	N/A	Comments
Have the relevant national/local regulations been identified and implemented?				
General living facilities	Y	N	N/A	Comments
Is the location of the facilities designed to avoid flooding or other natural hazards?				
Are the living facilities located within a reasonable distance from the worksite?				
Is transport provided to worksite safe and free?				
Are the living facilities built using adequate materials, kept in good repair and kept clean and free from rubbish and other refuse?				
Drainage	Y	N	N/A	Comments
Is the site adequately drained?				
Heating, air conditioning, ventilation and light	Y	N	N/A	Comments
Depending on climate are living facilities provided with adequate heating, ventilation, air conditioning and light systems including emergency lighting?				
Water	Y	N	N/A	Comments
Do workers have easy access to a supply of clean/ potable water in adequate quantities?				
Does the quality of the water comply with national/local requirements or WHO standards?				

Are tanks used for the storage of drinking water constructed and covered to prevent water stored therein from becoming polluted or contaminated?				
Is the quality of the drinking water regularly monitored?				
Wastewater and solid waste	Y	N	N/A	Comments
Are wastewater, sewage, food and any other waste materials adequately discharged in compliance with local or World Bank standards and without causing any significant impacts on camp residents, the environment or surrounding communities?				
Are specific containers for rubbish collection provided and emptied on a regular basis?				
Are pest extermination, vector control and disinfection undertaken throughout the living facilities?				
Rooms/dormitories facilities	Y	N	N/A	Comments
Are the rooms/dormitories kept in good condition?				
Are the rooms/dormitories aired and cleaned at regular intervals?				
Are the rooms/dormitories built with easily cleanable flooring material?				
Are the rooms/dormitories and sanitary facilities located in the same buildings?				
Are residents provided with enough space?				
Is the ceiling height high enough?				
Is the number of workers sharing the same room/dormitory minimised?				

Are the doors and windows lockable and provided with mosquito screens when necessary?				
Are mobile partitions or curtains provided?				
Is suitable furniture such as table, chair, mirror, bedside light provided for every worker?				
Are separate sleeping areas provided for men and women?				
Bed arrangements and storage facilities	Y	N	N/A	Comments
Is there a separate bed provided for every worker?				
Is the practice of “hot-bedding” prohibited?				
Is there a minimum space of 1 metre between beds?				
Is the use of double deck bunks minimised?				
When double deck bunks are in use, is there enough clear space between the lower and upper bunk of the bed?				
Are triple deck bunks prohibited?				
Are workers provided with comfortable mattresses, pillows and clean bed linens?				
Are the bed linen washed frequently and applied with adequate repellents and disinfectants (where conditions warrant)?				
Are adequate facilities for the storage of personal belongings provided?				
Are there separate storages for work clothes and PPE and depending on condition, drying/airing areas?				

Sanitary and toilet facilities				
Are sanitary and toilet facilities constructed from materials that are easily cleanable?				
Are sanitary and toilet facilities cleaned frequently and kept in working condition?				
Are toilets, showers/bathrooms and other sanitary facilities designed to provide workers with adequate privacy including ceiling to floor partitions and lockable doors?				
Are separate sanitary and toilet facilities provided for men and women?				
Toilet facilities	Y	N	N/A	Comments
Is there an adequate number of toilets and urinals?				
Are toilet facilities conveniently located and easily accessible?				
Showers/bathrooms and other sanitary facilities	Y	N	N/A	Comments
Is the shower flooring made of anti-slip hard washable materials?				
Is there an adequate number of hand wash basins and showers/bathrooms facilities provided?				
Are the sanitary facilities conveniently located?				
Are shower facilities provided with an adequate supply of cold and hot running water?				
Canteen, cooking and laundry facilities	Y	N	N/A	Comments
Are canteen, cooking and laundry facilities built with adequate and easy to clean materials?				

Are the canteen, cooking and laundry facilities kept in clean and sanitary condition?				
If workers cook their own meals, is kitchen space provided separately from the sleeping areas?				
Laundry facilities	Y	N	N/A	Comments
Are adequate facilities for washing and drying clothes provided?				
Canteen and cooking facilities	Y	N	N/A	Comments
Are workers provided with enough space in the canteen?				
Are canteens adequately furnished?				
Are kitchens provided with the facilities to maintain adequate personal hygiene?				
Are places for food preparation adequately ventilated and equipped?				
Are kitchen floor, ceiling and wall surfaces adjacent to or above food preparation and cooking areas built in non-absorbent, durable, non-toxic, easily cleanable materials?				
Are wall surfaces adjacent to cooking areas made of fire-resistant materials and food preparation tables equipped with a smooth, durable, non-corrosive, non-toxic, washable surface?				
Are adequate facilities for cleaning, disinfecting and storage of cooking utensils and equipment provided?				
Are there adequate sealable containers to deposit food waste and other refuse? Is refuse frequently removed from the kitchen to avoid accumulation?				
Standards for nutrition and food safety	Y	N	N/A	Comments
Is there a special sanitary process such as the WHO "5 keys to safer food" implemented in relation to food safety?				

Does the food provided contain appropriate nutritional value?				
Does the food provided take into account workers' religious/cultural backgrounds?				
Medical facilities	Y	N	N/A	Comments
Are first aid kits provided in adequate numbers?				
Are first-aid kits adequately stocked?				
Is there an adequate number of staff/workers trained to provide first aid?				
Are there any other medical facilities/services provided on site? If not, why?				
Leisure, social and telecommunications facilities	Y	N	N/A	Comments
Are basic social collective spaces and adequate recreational areas provided to workers?				
Are workers provided with dedicated places for religious observance?				
Can workers access a telephone at an affordable/public price?				
Are workers provided with access to internet facilities?				
Managing workers' accommodation				
Management and staff	Y	N	N/A	Comments
Are there carefully designed worker camp management plans and policies especially in the field of health and safety (including emergency responses), security, workers' rights and relationships with the communities?				

Where contractors are used, have they clear contractual management responsibilities and duty to report?				
Does the person appointed to manage the accommodation have the required background, competency and experience to conduct his mission and is he/ she provided with the adequate responsibility and authority to do so?				
Is there enough staff to ensure the adequate implementation of housing standards (cleaning, cooking and security in particular)?				
Are staff members recruited from surrounding communities?				
Have the staff received basic health and safety training?				
Are the persons in charge of the kitchen particularly trained in nutrition and food handling and adequately supervised?				
Charging fees for accommodation and services	Y	N	N/A	Comments
Are the renting arrangements fair and transparent?				
Are workers provided with adequate information about payment made?				
Where appropriate, are renting arrangements and regulations clearly included in workers' employment contracts?				
Are food and other services provided for free or reasonably priced, that is, not above the local market price?				
Is the payment in kind for accommodation and services prohibited?				
Health and safety on site	Y	N	N/A	Comments
Have health and safety management plans including electrical, mechanical, structural and food safety been designed and implemented?				

Has the accommodation manager a duty to report to the health authority specific diseases, food poisoning or casualties?				
Is there an adequate number of staff/workers trained in providing first aid?				
Has a specific and adequate fire safety management plan been designed and implemented?				
Is guidance on alcohol, drug and HIV/AIDS and other health risk-related activities provided to workers?				
Are contraception measures (condoms in particular) and mosquito nets (where relevant) provided to workers?				
Do workers have an easy access to medical facilities and medical staff, including female doctors/nurses where appropriate?				
Have emergency plans on health and fire safety been prepared?				
Depending on circumstances, have specific emergency plans (earthquakes, floods, tornadoes) been prepared?				
Security on workers' accommodation	Y	N	N/A	Comments
Has a security plan including clear measures to protect workers against theft and attack been designed and implemented?				
Has a security plan including clear provisions on the use of force been designed and implemented?				
Have the backgrounds of security staff been checked for previous crimes or abuses?				
Has the recruitment of security staff from both genders been considered?				
Have security staff received clear instruction about their duty and responsibility?				
Have security staff been adequately trained in dealing with domestic violence and the use of force?				

Are body searches only performed in exceptional circumstances by specifically trained security staff of both genders?				
Do security staff have a good understanding about the importance of respecting workers' rights and the rights of the surrounding communities and adopt appropriate conduct?				
Do workers and communities have specific means to raise concerns about security arrangements and staff?				
Workers' rights, rules and regulations on workers' accommodation	Y	N	N/A	Comments
Are limitations on workers' freedom of movement limited and justified?				
Is an adequate transport system to the surrounding communities provided?				
Is the practice of withholding workers' ID papers prohibited?				
Is freedom of association expressly respected?				
Are workers' religious, cultural and social backgrounds respected?				
Are workers made aware of their rights and obligations and provided with a copy of the accommodations' internal rules, procedures and sanction mechanisms in a language or through a media they understand?				
Are house regulations non discriminatory, fair and reasonable?				
Are regulations on alcohol, tobacco and third parties' access to the camp clear and communicated to workers?				
Is a fair and non-discriminatory procedure to implement disciplinary procedures, including the right for workers to defend themselves, set up?				
Consultation and grievance mechanisms	Y	N	N/A	Comments
Have mechanisms for workers' consultation been designed and implemented?				

Are workers provided with processes and mechanisms to articulate their grievances in accordance with PS2/PR2?				
Have workers subjected to disciplinary proceedings arising from conduct in the accommodation had access to a fair and transparent hearing with the possibility to appeal the decision?				
Are there fair conflict resolution mechanisms in place?				
In cases where serious offences occur, are there mechanisms to ensure full cooperation with police authorities?				
Management of community relations	Y	N	N/A	Comments
Have community relation management plans addressing issues around community development, community needs, community health and safety and community social and cultural cohesion been designed and implemented?				
Do community relation management plans include the setting up of liaison mechanisms to allow a constant exchange of information and consultation of the surrounding communities?				
Is there a senior manager in charge of implementing the community relation management plan?				
Is there a senior manager in charge of liaising with the surrounding communities?				
Are the impacts generated by workers' accommodation periodically reviewed, mitigated or enhanced?				
Are community representatives provided with easy means to voice their opinions and lodge complaints?				
Is there a transparent and efficient process for dealing with community grievances, in accordance with PS1/PR10?				



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-OHS-PLN-0001

EMERGENCY PREPAREDNESS AND RESPONSE PLAN

29 August 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	
01	Revisions as per the Client's comments	Whole Document

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1 INTRODUCTION

This document is the Emergency Preparedness and Response Plan (EPRP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This EPRP sets out specific instructions to manage emergency response situations.

The plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this EPRP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This EPRP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management of actions to be implemented for the preparedness and response to emergency cases during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance in terms of emergency preparedness and readiness,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety, and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principle Financial Institution
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- Equator Principles (EPs) IV,
- IFC Performance Standards (PSs) and EHS Guidelines,
- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and

- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices, and procedures

2.1 National Requirements

- Law No. 4857 Labor Law
- Law No. 6331 on Occupational Health and Safety
- Regulation on Emergencies in Workplaces
- Occupational Health and Safety Risk Assessment Regulation
- Regulation on Personnel Protective Equipment
- Regulation on Health and Safety Precautions Regarding Working with Asbestos
- Regulation on Protection of Workers from the Risk of Explosive Media
- Regulation on Health and Safety Precautions Regarding Workplace Buildings
- Regulation on Health and Safety at Construction Sites
- Regulation on First Aid
- Regulation on Procedures and Principles of Health and Safety Training for Employees
- Regulation on Use of Personnel Protective Equipment in Workplaces
- Regulation on Health and Safety Precautions Regarding Working with Carcinogenic and Mutagenic Substances
- Regulation on Health and Safety Precautions Regarding Working with Chemicals
- Regulation on Health and Safety Signs

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities)

and, where appropriate, other stakeholders.

IFC PS 2 Labor and Working Conditions recognizes that through a constructive worker-management relationship, and by treating the workers fairly and providing them with safe and healthy working conditions, clients may create tangible benefits, such as enhancement of the efficiency and productivity of their operations.

IFC PS 4 Community Health, Safety, and Security recognize that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this Performance Standard addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related activities, with particular attention to vulnerable groups.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to several other Management Plans which have pollution prevention implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

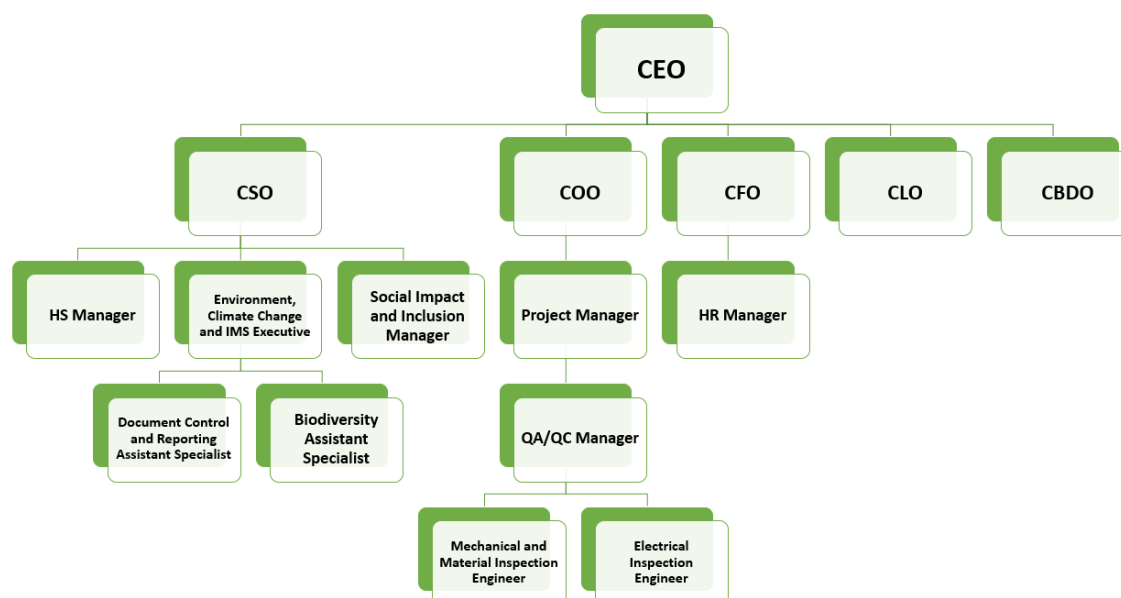


Figure 1: Organization Structure of the Kalyon Enerji

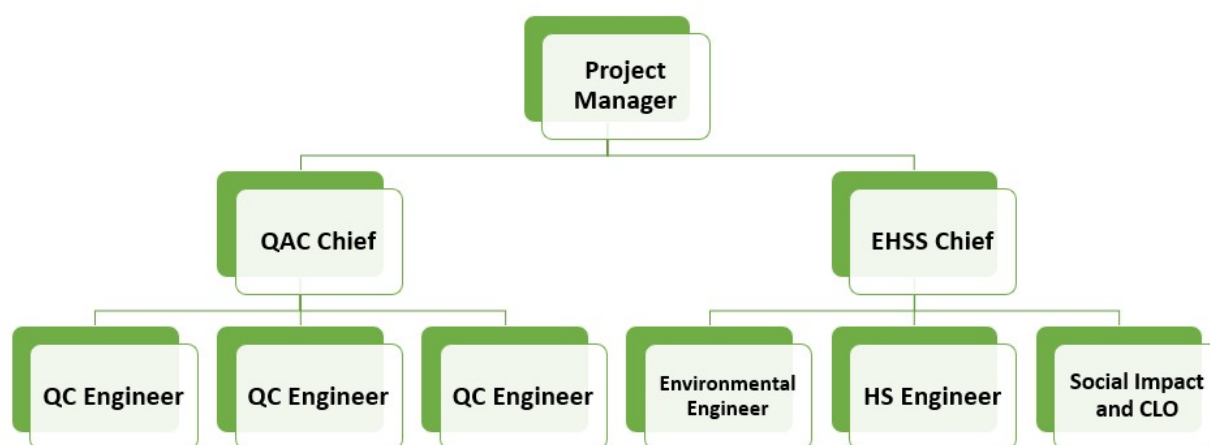


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organisational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level

Roles	Responsibilities
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided concerning Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> Prepare, manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and task are trained on this Plan. Conduct/organize periodic audits. Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for the implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji. Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and other occasions as required by legislation. Organize the training related to this procedure for the personnel who are responsible for this Plan. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits

Roles	Responsibilities
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the Camp Manager Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related training. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the training. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Support to effective implementation of this plan within scope of his/her responsibility. Perform regular inspections/audits, maintain records and report back to the EHSS Chief on the outcomes of the inspections/audits. Take action and support the resolution of complaints regarding his/her responsibility.
<i>Occupational Physician</i>	<ul style="list-style-type: none"> Conducts first response to the injured person in case of emergency and safely transfer to the hospital if required.

4 MANAGEMENT & MITIGATION REQUIREMENTS

Emergencies that may arise during the Project's activities are:

Natural Disasters

- Earthquake
- Flood
- Lightning
- Landslide

Unnatural Disasters

- Fire
- Flash and Explosion
- Sabotage, Terrorist Action, and War
- Spillage of Chemicals

- Epidemics, Food Poisoning
- Uncontrolled Emission
- Uncontrolled Discharge
- Environmental Accidents
- Occupational Accidents

4.1 Management & Mitigation Requirements Preventive and Limiting Measures Taken Against the Emergencies

All personnel will receive a "Training on Actions and Measures to be Taken During Emergencies" annually regarding the established emergencies. Through the competent authorities, it will be ensured that the Fire Fighting, Search, Rescue, Evacuation and First Aid teams receive the necessary training. An emergency drill will be performed and recorded at least twice a year, determining the shortcomings, and measuring the reaction and performance of the personnel during extraordinary circumstances. Fire equipment, first aid equipment and alarm systems will be checked monthly to review their efficiencies. The machinery and equipment that could cause emergencies are subjected to measurements and evaluations each year and additional maintenance will be performed when necessary. It will be ensured and checked that the emergency direction plates are in place and the emergency exits are opening outwards. Hazards and risks are monitored with the RISK ASSESSMENT FORM given in the method statements of the related activity. and in cases where the procedure is deemed insufficient, corrective, and preventive operations are determined.

4.2 Emergency Response and Evacuation Methods

4.2.1 Objectives, Scope, and Responsibilities

In all emergency and unexpected situations that may occur in the Project; it will be ensured that the data will enable the administration to take fast and accurate decisions, the creation of a work plan, ensure the safety of life and property, damage assessment and the organization of emergency operations will be carried out.

The scope of this plan encompasses the Kalyon Enerji Personnel, contractors, subcontractors, visitors, and the companies that provide services to them.

4.2.2 Application

4.2.2.1 Drill Plan

Emergency preparations are performed through drills. The appointed teams gather at least twice a year and perform the Drill. During the drill, scenarios are determined with regard to all-natural disasters and unnatural disasters. Within the framework of these scenarios, applications are performed, and solutions are proposed to solve the issues which may be encountered during the disasters, and they are solved as part of the evaluations. All information related to its solution is shared with the employees. Planning of emergency drills is recorded with the ANNUAL TRAINING PLAN, while the efficiency rating is recorded with the EMERGENCY DRILL ASSESSMENT REPORT. As a result of the efficiency rating, training is provided within 15 days at the latest, concerning the errors arising from the response.

4.2.2.2 Actions to be Taken Before the Emergency

Before the potential emergencies, the related personnel are given training (fire, rescue and first aid) and they are made to perform drills under the training they have received. Other personnel are also informed regarding the subject and the actions to be taken during the emergencies are explained to them.

4.2.2.3 Actions to be Taken During the Emergency:

During emergencies, aside from the personnel who were trained and who performed drills, all other personnel

act under the instructions of the trained personnel and obey the necessary commands. In case of any emergencies, firefighting, rescue, protection, first aid and energy sources response teams act according to the natural disasters and unnatural disasters specified in the fire instructions and additionally defined hereunder. For instance, if a fire occurs during work hours, the first person to see the fire sets everyone else in motion by blowing a whistle, via telephone or by shouting and pushing the nearest fire button and immediately alerting the fire department. Fire Fighting Team positions itself on or under the location where the fire has started and tries to extinguish the fire. Search, Rescue and Evacuation team, on the other hand, rescues the living creatures during natural disasters or fires. During a fire or a natural disaster, it makes the documents and objects ready for evacuation according to their order of priority. The protection team gathers the personnel in the muster point and prevents panic or commotion. It also keeps the entrances and exits under control. The first aid team applies first aid to the wounded and tends to the sick during fires or natural disasters. The energy sources response team cuts all the power sources on the site and prevents any potential explosions.

The Emergency On-site Commander (Project Manager) will lead the actions to be taken by the emergency response team member via sufficient communication means and devices.

The persons performing first aid response are required to possess a first aid training certificate.

In cases of emergencies, the evacuation arrangements that may be followed to lead the personnel to a safe location, the emergency response and first aid equipment to be used, places where the alarm systems are located, and the assembly area are specified on the EMERGENCY EQUIPMENT AND EVACUATION PLAN.

4.2.2.4 Actions to be Taken After the Emergency:

After the emergency, actions are taken specifically according to the health and safety and environmental aspects and risks.

In this respect, fire ash, earthquake or flood remnants are removed in a controlled manner and sent to the necessary waste management centre.

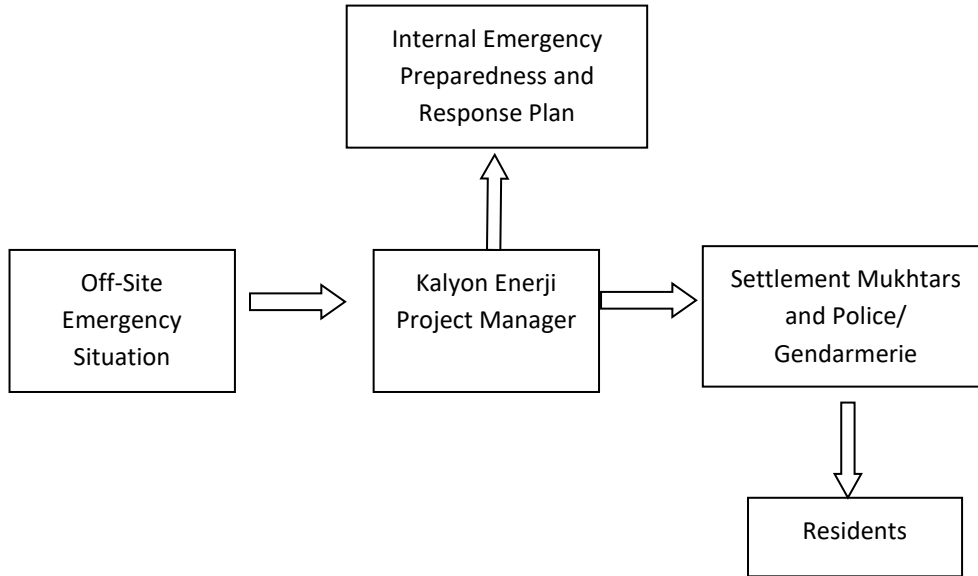
After the emergency, an event scene investigation is performed, and an assessment report is created regarding the event. If there is an unwanted situation, the root cause of the error is investigated and if it is concluded that an action is to be taken as a result of the assessment, such actions are planned.

The relevant revisions are made to the Risk Analysis by the Risk Assessment Team which works under the Planning Team.

4.2.2.5 Off-Site Emergency Response:

Off-site emergencies are uncontrollable emergencies which spread outside the working site and affect the local stakeholders. This Off-site Emergency Response includes preventing Project stakeholders from being affected by such emergencies, reacting quickly and preventing death/injury/loss of property.

The Project Manager will be the key contact in the off-site emergency response events and will provide information to the settlement heads and police/gendarmerie. The Project Manager will control the below flow of communication between the residents and emergency contacts.



4.3 Emergency Teams and Their Duties

4.3.1 Planning and Risk Assessment Team:

Is responsible for creating emergency plans, detecting, and analysing emergency hazards and risks, planning emergency drills, and determining the actions to be taken during and after the emergency.

4.3.2 Emergency On-site Commander:

- According to the emergency message received, based on the first alarm, initiates the related part of the action plan in terms of the occurred event.
- Supervisors bring the personnel at the key location and the representatives of the help organizations together at the pre-determined action centre to evaluate the scale of the emergency and the outline of the action plan is determined during this meeting.
- Sets the support personnel in motion and supports the supervisors.
- Seeks consultation from the expert authorities if necessary.
- Monitors and supports the emergency action plan until the normal operating conditions are reinstated.
- When necessary, evaluates, criticizes, and develops the emergency action plan in terms of action time, suitability of the action method, equipment, communications, personnel training, flexibility, support personnel efficiency and mutual assistance.
- Establishes coordination with the headquarters.

4.3.3 Fire Fighting Team:

In emergencies, the persons who are appointed as the firefighting team, act according to the fire instructions and the fire emergency plan. In potential fires, they conduct fire extinguishing operations.

- Initiates the first response by promptly making use of the fire extinguishers, equipment, and materials available in the fire zone in the best manner possible.
- If the fire has started in a confined space, break the doors and windows down, enter the area and start the extinguishing process.

- When the fire engines arrive at the scene, enter the fire department's service and perform the instructions it receives from them.

4.3.4 Search, Rescue and Evacuation Team:

In emergencies, the persons who are appointed as the search and rescue team on the list of emergency teams; implement the plans according to the nature of the emergency and are responsible for removing the persons in danger along with the documents and materials listed under the priorities to be rescued during fires as soon as possible and transporting them to the area where the first aid team is located.

- Brings a sufficient amount of catch-alls, sacks and blankets to the fire site.
- Rescues the living creatures first, then rescues the valuable documents and belongings.
- When rescuing equipment from the fire, establishes a safe corridor starting from the flammable materials that are closest to the fire site, and delivers the rescued equipment to the protection team.

4.3.5 Protection Team and Its Duties:

In emergencies, the persons who are appointed as the Protection team on the list of emergency teams; implement the plans according to the nature of the emergency and are responsible for notifying the related authorities and the persons responsible specified under the LIST OF EMERGENCY CONTACTS, securing the perimeter, mitigating the panic, and ensuring that the emergency area is completely evacuated.

- Gathers the valuable belongings and documents that are evacuated from the building during emergencies at a secure location.
- Prevents unauthorized tampering or removal of the evacuated valuable assets and documents under any condition.
- Does not let anyone near their location.
- According to the location of the emergency, gathers the related unit's personnel at the assembly area and prevent access.
- Keeps the building entrances and exits under control.
- Performs necessary checks, including performing a roll call to determine any person who may have been left at the workplace after the evacuation.
- The materials are not to be handed over until damage assessments are performed, and the materials are handed over with a signature.

4.3.6 First Aid Team and Its Duties:

In emergencies, the persons who are appointed as the first aid team on the list of emergency teams; are responsible for notifying the healthcare teams and applying the necessary first aid to the persons who are brought to the first aid area by the protection team, until the paramedics arrive.

- Removes the persons who were injured during the emergency from the hazardous area following the first aid rules.
- According to the location of the emergency, determines the wounded and applies first aid.
- Calls the ambulance depending on the urgency of the wounded and refers them to the hospital immediately.
- Prepares materials for burns and wounds.

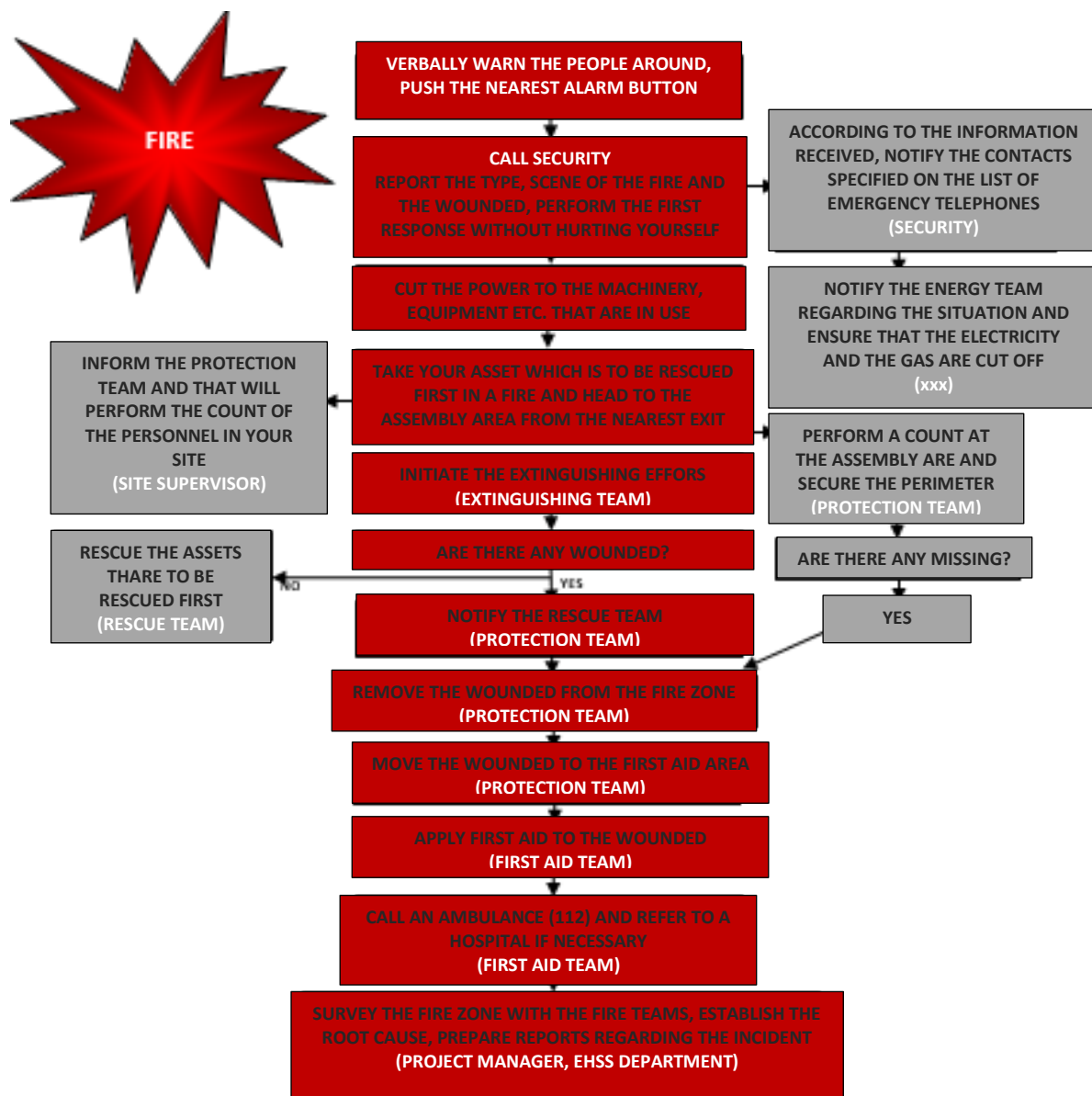
- Prepares stretchers and medication to transport the wounded.
- Helps the healthcare personnel who arrive at the scene.

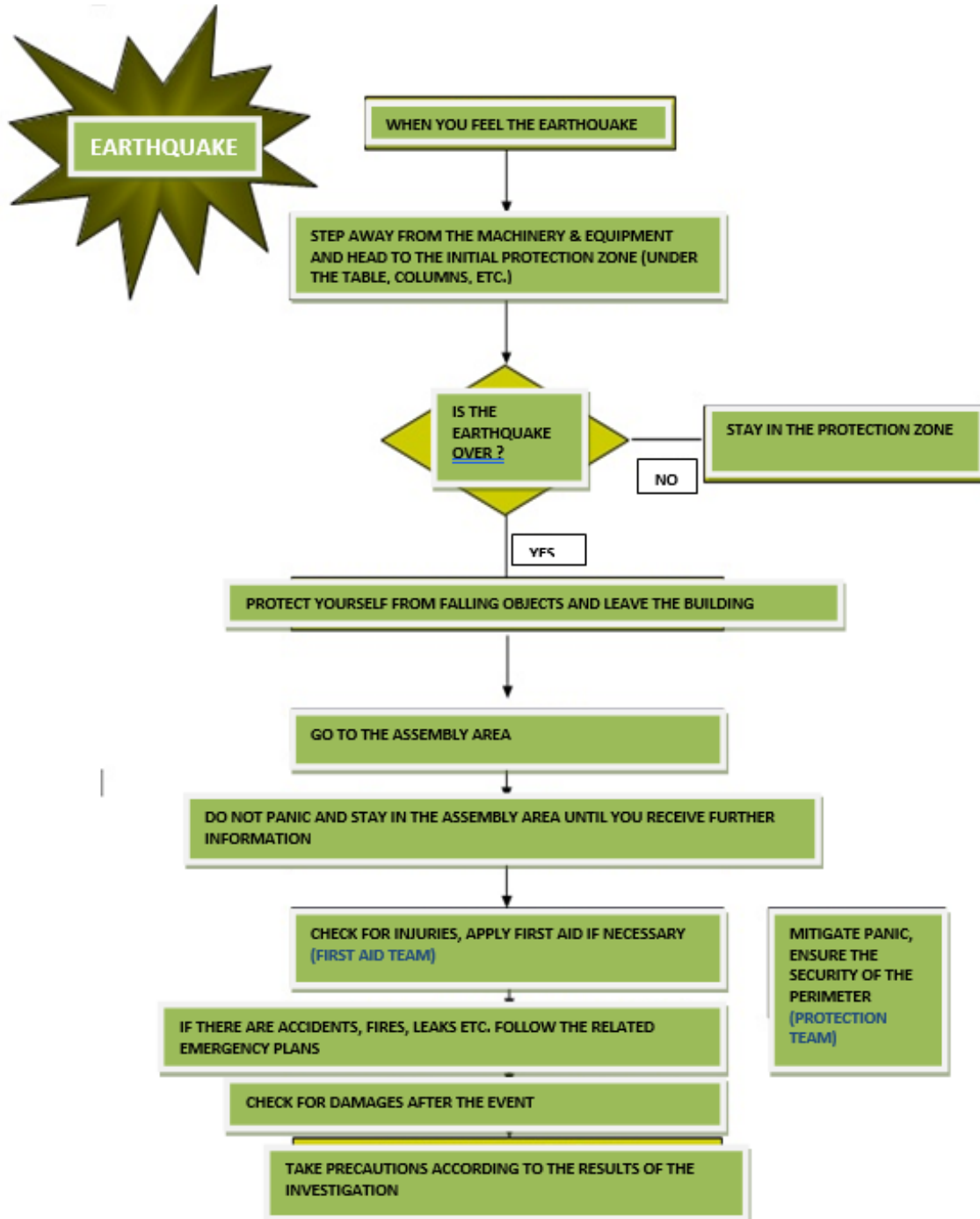
4.3.7 Energy Sources Response Team and Its Duties:

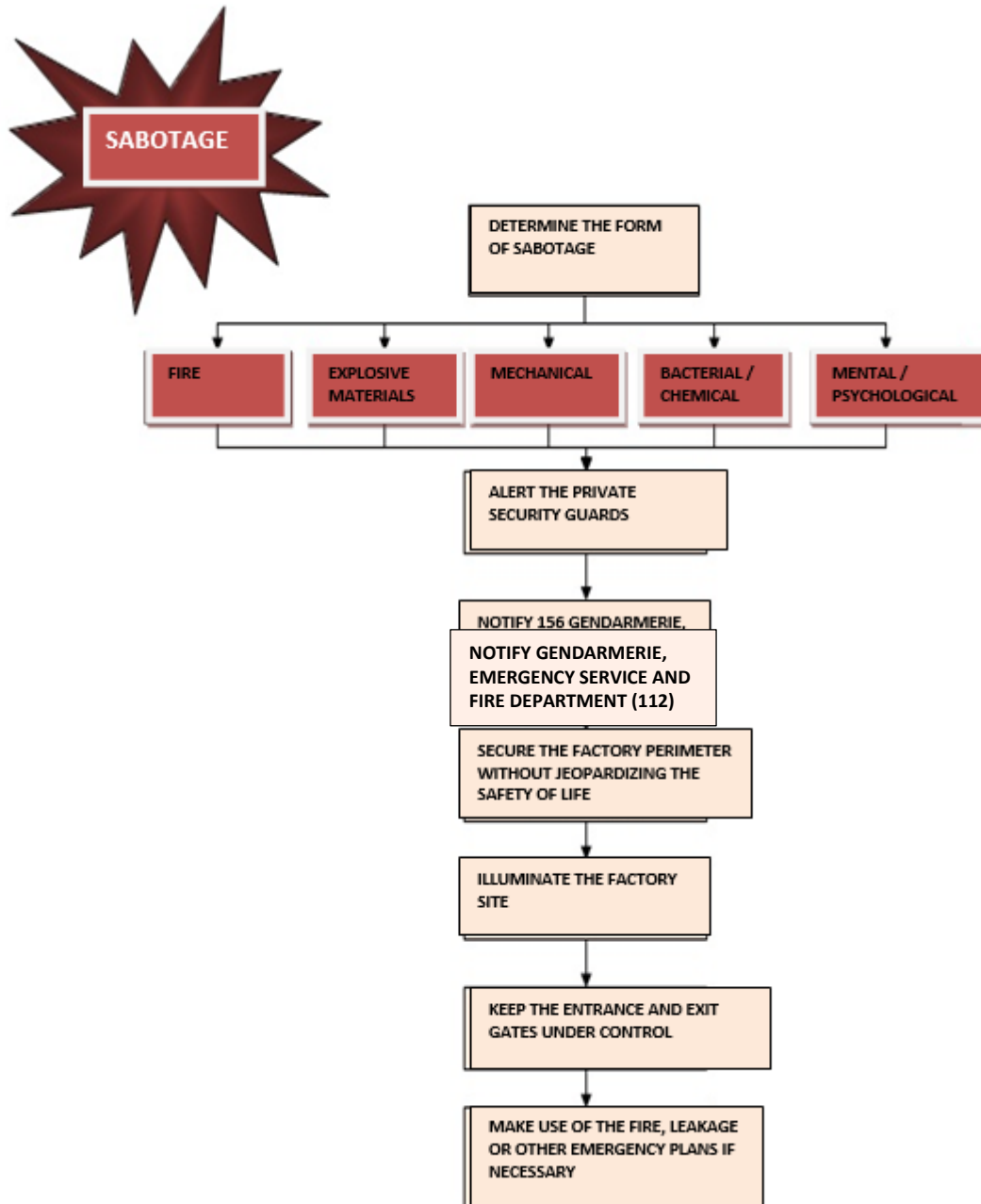
In emergencies, the persons who are appointed as the energy sources response team on the list of emergency teams; are responsible for cutting off the electricity, natural gas, and dangerous chemical lines to the emergency area.

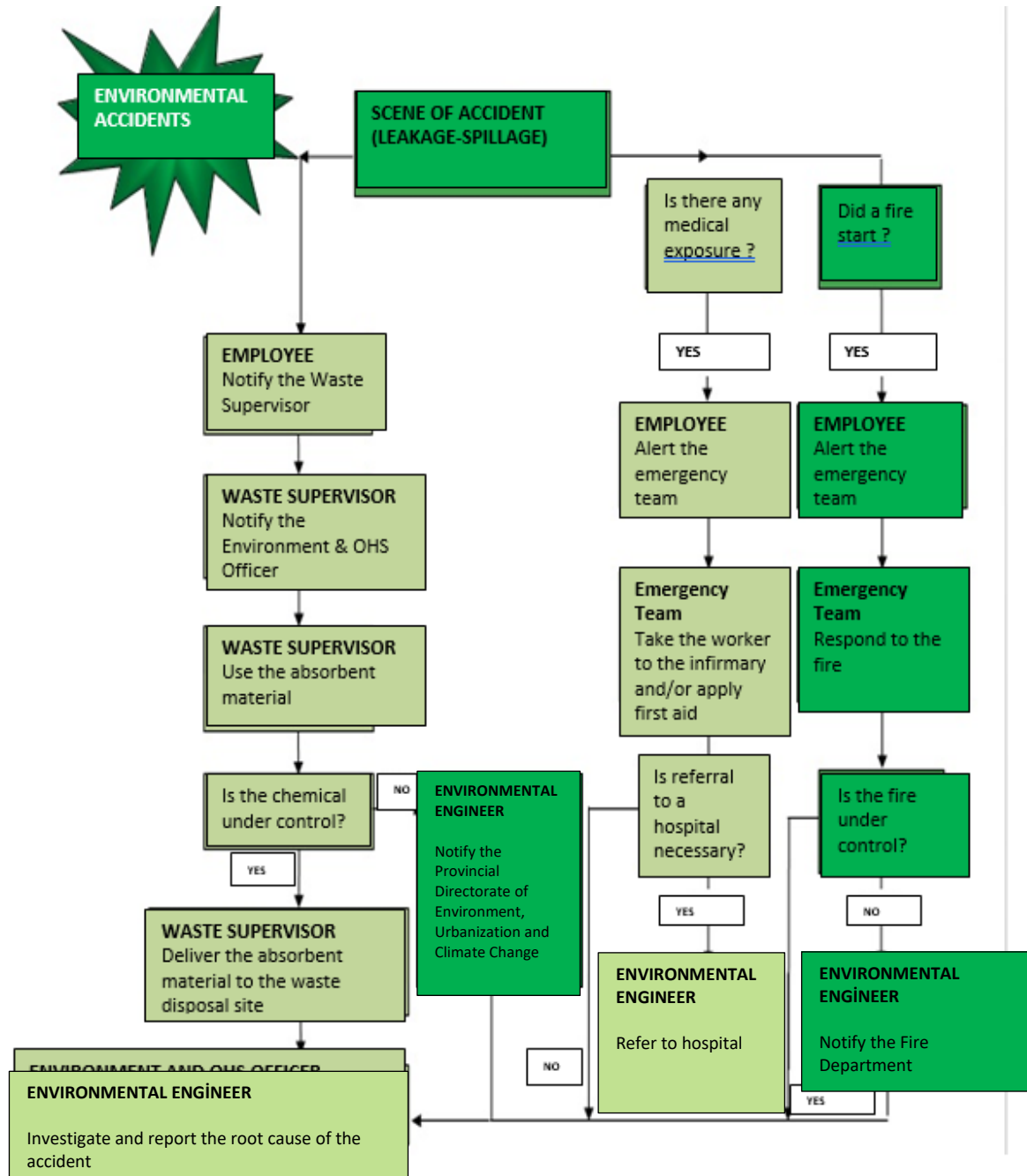
- Checks whether the energy sources are cut off or not.

4.4 Emergency Instructions

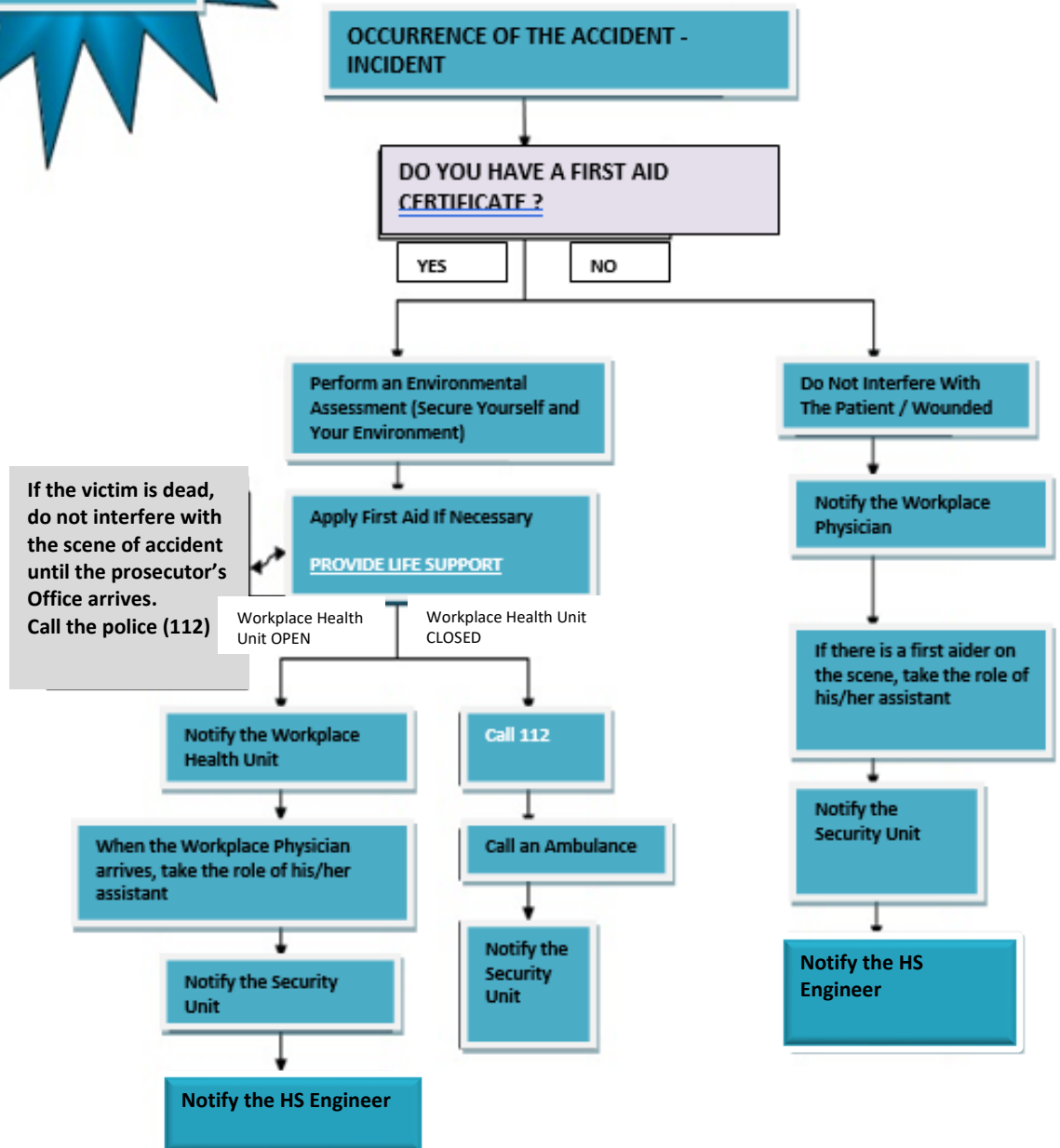


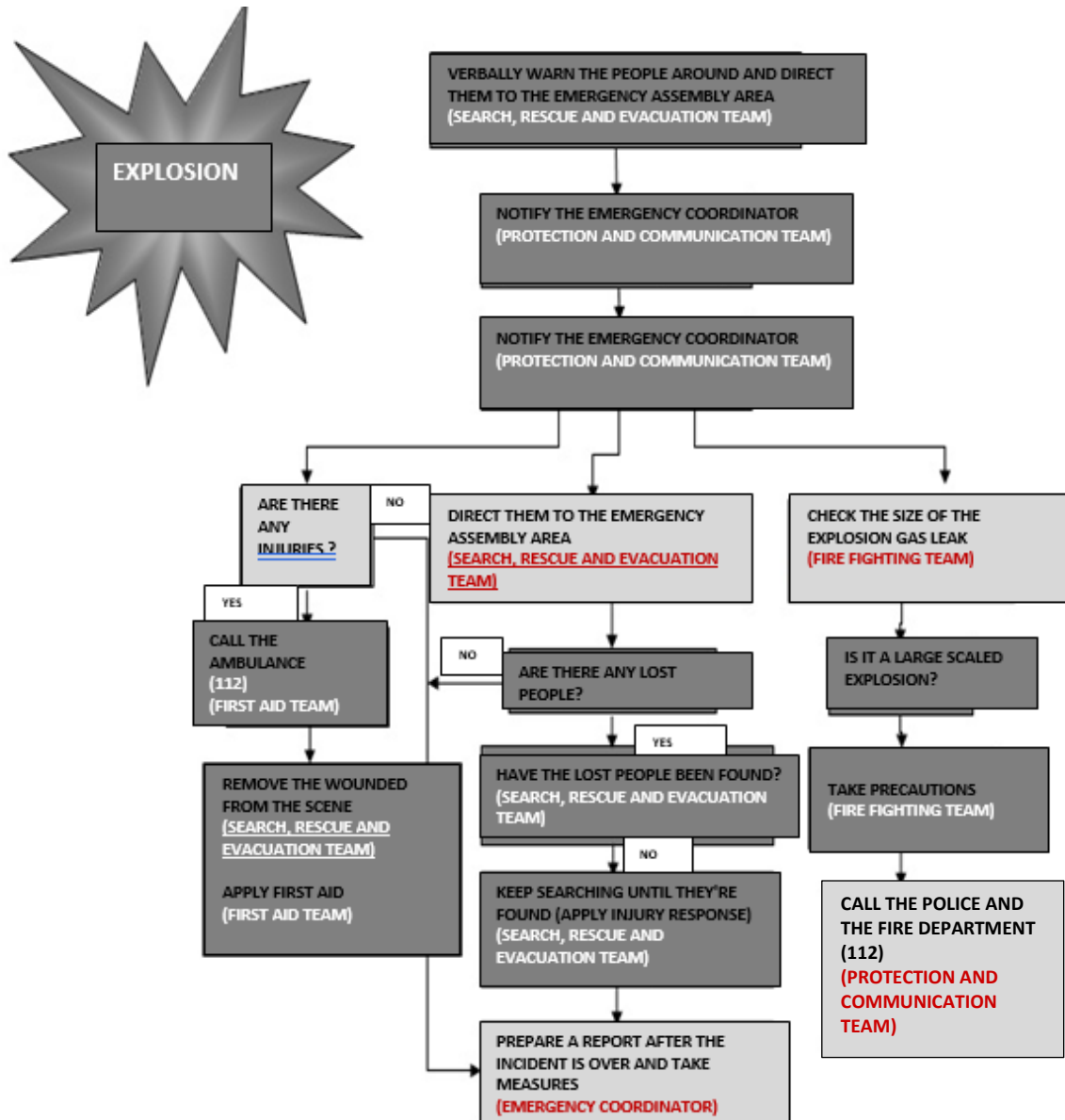


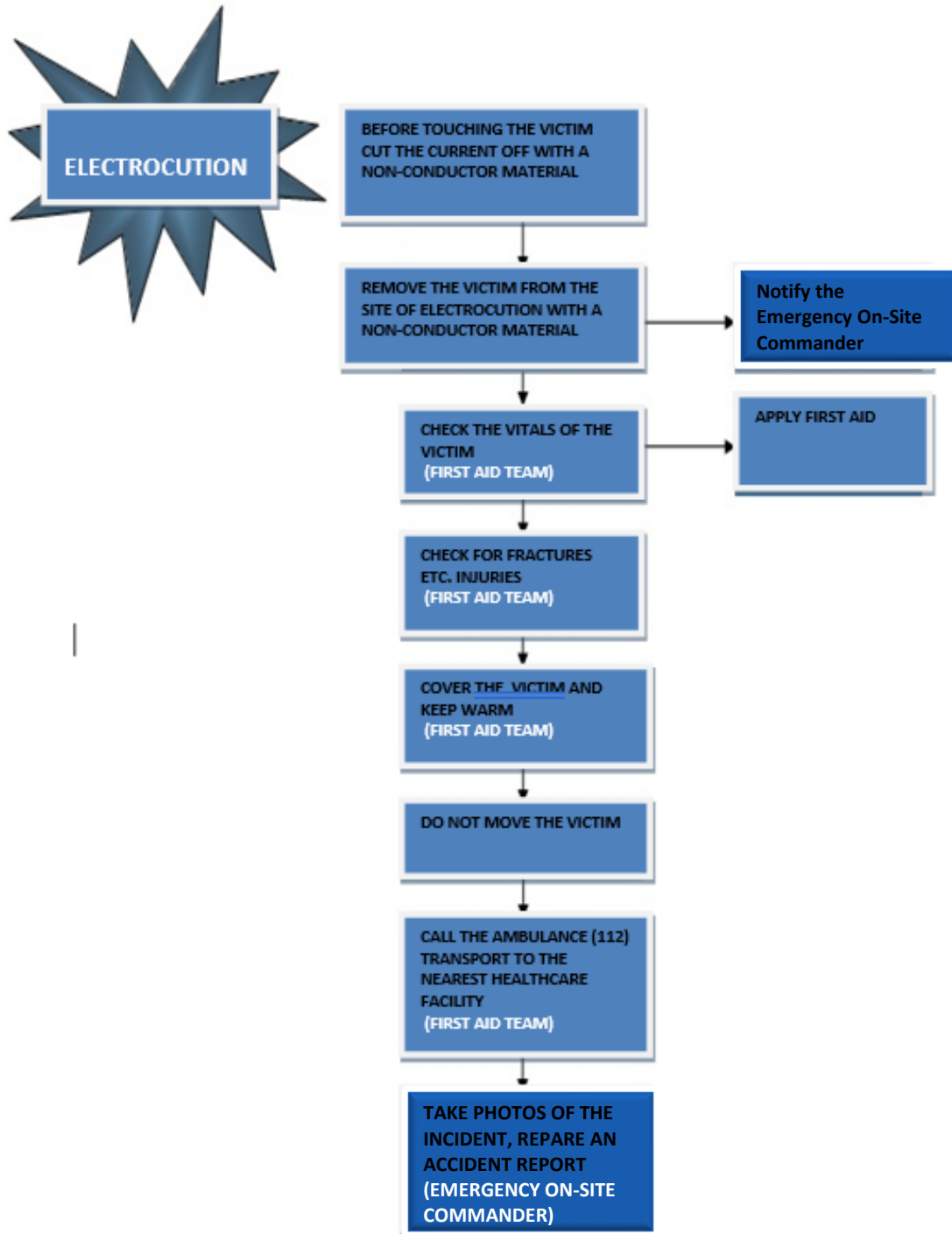












4.5 List of Emergency Teams

FIRE FIGHTING TEAM

NAME AND SURNAME	TELEPHONE
HAKAN BEDİR	05464945111
MEHMET POLAT	05367252127
ABDULBAKİ ATEŞGİL	05369607670

B. SEARCH, RESCUE AND EVACUATION TEAM

NAME AND SURNAME	TELEPHONE
MUSTAFA AKBULUT	05343911627
SEYFETTİN ŞİMŞEK	05061511594
AHMET YALÇIN	05348236552

C. PROTECTION AND COMMUNICATION TEAM

NAME AND SURNAME	TELEPHONE
GÖRGÜN AYDİK	05364041520
HÜSEYİN DAĞDEVİREN	05359535202
MEHMET YILMAZ	05466360983

D. FIRST AID TEAM

NAME AND SURNAME	TELEPHONE
TBD	TBD
TBD	TBD

E. EMERGENCY COORDINATOR

NAME AND SURNAME	TELEPHONE
ONUR ALİ TİMUR	05320637583
İLHAMİ CAN BAYRAKTAR	05553117107
UFUK KARADUMAN	05330514601

4.6 Emergency Evacuation Plan and Telephones

The nearest hospital to the Project site is Şahinbey Research and Application Hospital with the address of Üniversite Blv., 27310 Şehitkamil/Gaziantep, Türkiye. The hospital can be accessed by using the existing roads given in the map below. The distance from the site to this hospital is approximately 22.8 kilometres.

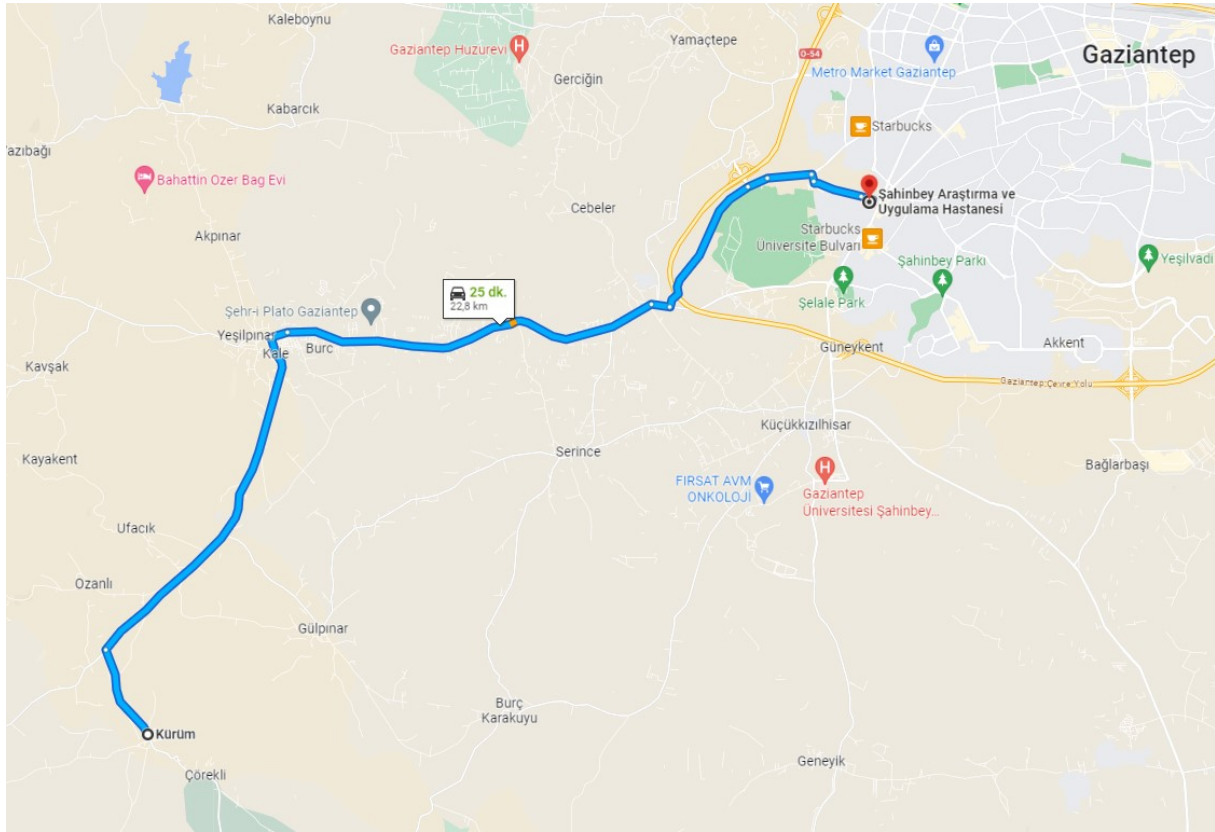


Figure 3: Transportation map from the project site to the nearest hospital

EMERGENCY PHONE LIST		
NAMES		PHONE INFORMATION
SECURITY	Security Phone	05537941111
AMBULANCE HEALTH SECURITY	Emergency Ambulance	112
	Şahinbey Research and Application Hospital	0342 360 60 60
	Health and Safety Engineer (Specialist)	0 533 051 46 01
	Camp Manager	TBD
ALL EMERGENCIES	All Emergencies	112
TELEPHONE	Phone Breakdown	121
ELECTRIC	Electrical Breakdown	186
WATER	Water supply Breakdown	185

5 TRAINING & AWARENESS

All employees including employees of Client, EPC, and its sub-contractor will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

All personnel receive a “Training on Actions and Measures to be Taken During Emergencies” annually regarding the established emergencies. Through the competent authorities, it is ensured that the Fire Fighting, Search, Rescue, Evacuation and First Aid teams receive the necessary training. The persons performing first aid response are required to possess a first aid training certificate.

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor’s supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
EPRP-1	Emergency Equipment	Conduct Site inspection for emergency equipment, first-aid kits etc. in terms of availability and content	EPC and its sub-contractor	Monthly
EPRP-2	Emergency Record	The number of emergencies that have triggered the emergency response is recorded in monthly HSE statistics	EPC and its sub-contractor	Monthly
EPRP-3	EPRP Procedure	Emergency Preparedness and Response Procedure prepared, reviewed and updated	EPC and its sub-contractor	Prepared at the start of the activities. Reviewed/updated annually (official EPRP Plan every two years or if required)

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the emergency response and

preparedness practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
<i>EPRP-KPI-1</i>	Inspections completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>EPRP-KPI-2</i>	Emergency Preparedness and Response training of employees and specific training for emergency response teams completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>EPRP-KPI-3</i>	Total % of Emergency-related non-conformities closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
<i>EPRP-KPI-4</i>	Total % of Emergency-related grievances closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-OHS-PLN-0002

Hazardous Material Management Plan

11 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Hazardous Material Management Plan (HMMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project (“the Project”). This HMMP sets out the requirements for the management of environmental impacts, particularly concerning hazardous material management during the implementation of the Project.

The Plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this HMMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. (“Kalyon Enerji”) and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. (“Client”), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)’s Common Approaches.

1.1. Scope

This HMMP applies to all Project activities under the Client’s supervision, its contractors and all employees. The Client is the main responsible for the implementation of this Plan. Contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed under Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is;

- To define the scope and applicable interphases for the management of hazardous material during all project activities,
- To define project standards in terms of components,
- To define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- To manage components and monitor Project performance,
- To define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety, and Social
EPs	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HMMP	Hazardous Material Management Plan
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
SDS	Safety Data Sheet
OECD	Organization for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP),
- International Conventions and Protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Occupational Health and Safety Law No. 6331
- Labor Law No. 4857
- Regulation on Risk Assessment of Occupational Health and Safety
- Regulation on Occupational Health and Safety Services
- Regulation on Health and Safety Signs
- Regulation on Emergency Situations in the Workplaces
- Regulation on Principles and Procedures for Occupational Health and Safety Training of Employees
- Regulation on Health and Safety Measures to be taken in Workplace Buildings and Annexes
- Regulation on Health and Safety Conditions on the Use of Work Equipment
- Regulation on Use of Personal Protective Equipment at Workplaces
- Regulation on Occupational Health and Safety Requirements for Temporary or Fixed-Term Employment
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on Health and Safety Measures in Working with Chemical Substances
- Regulation on Safety Data Sheets on Harmful Substances and Mixtures
- Regulation on the Protection of Workers against Hazards of Explosive Environments
- Regulation on Protection of Buildings from Fire
- Regulation on First Aid
- Regulation on Duties, Authorities, Responsibilities and Training of Workplace Physicians and Other Health Personnel
- Regulation on the Classification, Labelling and Packaging of Materials and Mixtures
- Regulation on Transportation of Dangerous Goods by Road
- Regulation on Waste Management
- Regulation on Preventing Major Industrial Accidents and Reducing Its Impacts
- Regulation on Control of Soil Pollution and Lands Contaminated by Point Sources

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 3 Resource Efficiency and Pollution Prevention, outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. In addition, this PS promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to several other Management Plans which have hazardous material management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)

- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan
- Stakeholder Engagement Plan

3 ORGANIZATONAL STRUCTURE

3.1 Project Implementation Organization Chart

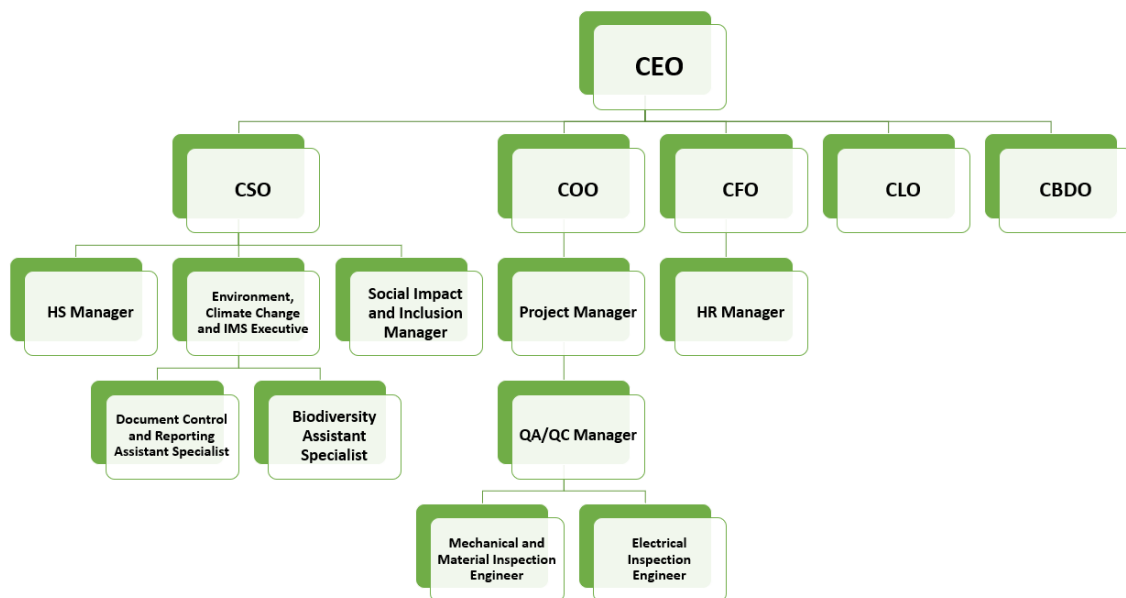


Figure 1: Organization Structure of the Kalyon Enerji

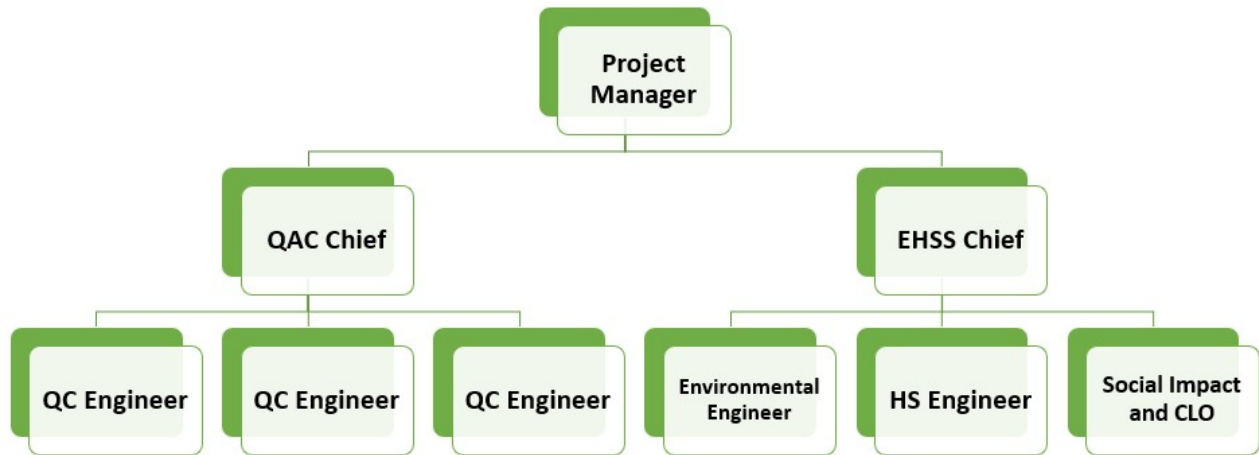


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organizational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> Prepare, manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits. Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions.

Roles	Responsibilities
	<ul style="list-style-type: none"> • Ensure all relevant topics followed are reported to Kalyon Enerji. • Obtain data from sub-contractors regarding activities defined in this Plan. • Organize trainings related to this Plan. • Conduct periodic internal audits. • Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). • Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. • Ensure site activities are implemented according to applicable H&S requirements. • Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. • Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<p><i>EPC</i> <i>Personnel Affairs Chief</i></p>	<ul style="list-style-type: none"> • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment and training. • Report to government and other bodies on compliance with commitments and other occasions as required by legislation. • Organize the training related to this procedure for the personnel who are responsible for this Plan. • Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<p><i>Security</i></p>	<ul style="list-style-type: none"> • Control incoming and outgoing traffic at all times. • Report all security issues to the • Involve in the investigation team for the investigation of the security incidents. • Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. • Ensure all mitigation measures and management controls are implemented properly. • Ensure that only properly trained and qualified security personnel are employed. • Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<p><i>Sub-contractors</i></p>	<ul style="list-style-type: none"> • Develop its own procedure to fully implement this Plan. • Ensure compliance with Project standards and contractual agreements. • Ensure related non-compliances are recorded and responded to immediately. • Conduct internal audits and record identified incompliances. • Provide related training. • Appoint a responsible person for activities defined in this Plan. • Provide staff, equipment, and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<p><i>All Employees</i></p>	<ul style="list-style-type: none"> • Participate in the training. • Ensure compliance with measures defined in this Plan.
<p><i>Camp Manager</i></p>	<ul style="list-style-type: none"> • Support to effective implementation of this plan at the camp site.

Roles	Responsibilities
	<ul style="list-style-type: none"> Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to -EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence.

4 MANAGEMENT & MITIGATION REQUIREMENTS

Hazardous materials will be categorized per the Regulation on Health and Safety Measures in Working with Chemical Substances, which also complies with international standards. Within this regard, hazard classes are defined as:

- Explosive
- Oxidizers, solids, or liquids
- Extremely flammable, highly flammable and flammable
- Toxic, highly toxic, and dangerous
- Corrosive
- Irritating
- Allergenic
- Carcinogenic and mutagenic
- Materials having one or more hazardous characteristics for the environment.

The key stages of the hazardous material management process that will be applied by the Client are as follows.

For the information regarding hazardous wastes please refer to Waste Management Plan.

4.1 Transportation of Hazardous Materials

- Transportation of hazardous materials to the Project area shall comply with the Regulation on Transportation of Dangerous Goods by Road.
- A dangerous Goods Operation Certificate shall be obtained from the relevant authority.
- Transportation of hazardous materials will be carried out by experienced and trained personnel at the appropriate times of day (as much as possible in the daytime).
- Transportation will be performed at appropriate speed limits depending on the conditions of the roads and the equipment to be used for transportation.
- Employees will use suitable PPE according to the properties of the hazardous material.
- Checklists of the vehicles will be filled in and if a deficiency is detected, this deficiency will be eliminated before the transportation.
- Vehicles and equipment performing transportation will be marked with warning signs indicating the transportation of hazardous materials and the signs suitable for the products they are carrying.
- Hazardous materials will be kept in suitable containers and checked for deformation in the containers

before the commencement of loading and transportation processes.

- At the site entrance, hazardous materials will be checked upon receipt to ensure that the quantities and the types match the approved purchase order. Unapproved materials will not be accepted to enter the site.
- There will be an adequate amount of spill response materials, in cases of spillage during transportation/loading.
- In case of spillage during transportation and/or loading, the Emergency Preparedness and Response Plan will be triggered.
- Hazardous materials will be placed in vehicles for transportation in accordance with their hazard classes and manufacturer's instructions.
- Security personnel will collaborate with Procurement and EHSS departments to ensure that all hazardous materials are checked in upon receipt and that quantities and material descriptions match associated shipping manifests.
- Security personnel will be tasked with providing transporters specific directions on the final delivery location internal to the site.
- Security personnel will alert the EHSS department, which will monitor the off-loading or staging of the delivered materials.
- During the unloading and/or loading of hazardous materials, any unauthorized persons will not be allowed to enter the area, and the area will be indicated by warning signs that hazardous material is being unloaded or loaded.

4.2 Storage of Hazardous Materials

- All hazardous materials will be stored in a designated storage area that has a lean-to roof, concrete floor, and secondary containment of at least 110% of the largest tank or 25% per cent of the combined tank volumes in areas with above-ground tanks for liquid ones and proper drainage for spills/leaks. Within this respect, a blind shaft will be provided against spillages and ground will be directed to the blind shaft via slope.
- Hazardous materials will be stored in accordance with the hazardous material storage matrix provided in Appendix A, however, recommendations given in the safety data sheets (SDSs) of the hazardous materials should also be taken into account. The matrix should be updated in accordance with the hazardous material inventory.
- The floor of the storage area will be made of nonslip and easy-to-clean material.
- Proper lighting and ventilation will be provided in storage areas.
- Storage areas will be kept clean and only authorized personnel will be allowed to enter.
- Hazards and protective measures will be provided as signs.
- For each material, SDSs will be procured before the arrival of purchased materials.
- Storage and use risks will be determined before the arrival of materials to prevent irreversible damage.
- SDSs will be provided to Project EPC and its sub-contractor's EHSS team responsible for the storage area.
- SDSs will be replaced with recent versions if the release dates of SDSs are older than five years or a new version is released by the manufacturer. SDS will be available in both English and Turkish language.

- SDSs will be kept close to the storage area.
- Copies of the required SDSs for each hazardous material will be provided to contractors and these will be readily accessible during each work shift to all employees.
- Materials will be stored in accordance with their hazard classes and manufacturer's instructions.
- Alphabetical and bulk storage will be avoided.
- Storage of materials, especially flammables, will be arranged to protect them from sunlight and heat sources.
- All containers will be properly labelled with the common chemical name, trade name, percentage of its agent, the physical state of the material, particular hazards of the material such as flammable, corrosive, reactive or toxic and the name of the manufacturer. Transportation requirements should also be considered in the labelling of the chemicals.
- Containers containing flammable and/or toxic materials will be kept permanently closed and covered. They will be kept in their original packaging as well.
- Storage containers will be compatible with the materials stored.
- If the container is damaged or leaking, the material will be transferred to a container in good condition.
- Liquid hazardous materials such as paint, thinner, various solvents, and lubricants that need to be kept outside of the hazardous material storage area will be stored within their containers with secondary containment structures or drip trays.
- Drummed hazardous materials will be stored in areas with impervious surfaces that are sloped to retain any spills/leaks.
- If a hazardous substance is removed from the primary container for use or distribution, the second container will be labelled with the same information.
- Mixtures will also be labelled and the "manufacturer name" will be specified during the preparation of the material individually or while placed into the container.
- The maximum permissible amount of storage will be written clearly on the storage shelves.
- Storage shelves will be connected to the wall or floor to provide stability. Additional protective barriers will also be provided on the shelves to prevent the falling of the containers.
- Warning and guidance signs will be provided at the entrance of the storage area.
- Storage areas will be locked to prevent the entry of unauthorized personnel.
- Absorbents/spill kits will be located near the storage area in case of any chemical spillage or leakage resulting from an accident.
- Accessible eye wash and the solution will be placed near the storage area.
- Related PPE will be provided to authorized personnel responsible for the handling of hazardous substances.
- The use of matches and smoking etc. near the storage area will be prohibited and "no smoking" signs will be placed wherever there is a hazard from ignitable or reactive material.
- Fire extinguishers will be installed in storage areas, especially in the sections where inflammable chemicals are stored.

- Generators will be placed in secondary containments.

4.3 Use of Hazardous and Chemical Materials

- When working with hazardous/chemical materials in work sites and their extensions, hazards for health and safety, and the environment will be detected for each material/chemical in use, and control measures will be identified. All personnel working with or exposed to hazardous/chemical materials will know the properties, effects, and protection methods of the materials. Necessary information about hazardous/chemical materials and their harmful effects will be learned from the SDSs. Therefore, SDSs of hazardous/chemical materials will be kept accessible to all employees on work sites.
- Only authorized employees will be allowed to use or prepare chemical materials. PPE will be provided and usage of them will be ensured when handling hazardous/chemical materials.
- The work environment will be constantly observed, with caution against chemical spills and leaks.
- Chemical materials will not be discharged to the drainage channels or sinks.
- Food, beverages, and tobacco products will not be transported, stored, or used in chemical storage and preparation areas. When working with chemicals, the hands and face will be washed with soapy water before eating, drinking, and smoking during breaks.
- All personnel will be informed of where safety showers and first aid equipment are located.
- Chemical vapors will not be inhaled, or contacted with eyes, skin, and clothes. If the vapour is inhaled, the wounded person will be taken out for fresh air, if respiration stops, artificial respiration will be carried out (by the first aider) and immediate medical assistance will be requested.
- When the skin or eyes come in to contact with chemicals, the area that has been in contact with chemicals will be washed with plenty of running water (where not available in a safety shower or eye wash station, with a clean water source) for at least 20 minutes, and medical assistance will be requested.
- Before starting to use chemical materials, their SDSs will be read, and other safety measures will be learned by personnel.
- Water bottles, food containers, cups and pitchers will not be used as chemical containers.
- Disposal of hazardous material waste (expired chemicals, etc.) will comply with the Waste Management Plan.
- Refuelling operations will be carried out at designated refuelling paved areas using retention tanks or drip trays (of appropriate volume) to collect leaks/spills.
- If refuelling will be carried out directly through tankers, retention tanks or drip trays (of appropriate volume) will be placed below to collect leaks/spills.
- Refuelling activities on traffic routes will be avoided.
- Any hot work activity will be avoided in the proximity of the refuelling or storage area.
- The tanker delivery hose will be checked for the presence of residual fuel from the last fueling operation. If there is residual fuel, the delivery hose will be handled accordingly.
- The delivery pipes will be properly connected, and the integrity of all terminal connections will be verified.

4.4 Risk Assessment

The risk assessment will be carried out according to the provisions of the Regulation on Risk Assessment of Occupational Health and Safety, and Regulation on Health and Safety Measures in Working with Chemical Substances to determine the negative effects of the hazardous/chemical materials used in work sites and their extensions on the health and safety of employees.

The following points will be particularly taken into consideration in the risk assessment:

- Hazards and harms of the material for health and safety,
- SDSs to be provided by the manufacturer, importer, or vendors,
- Type, level, and duration of exposure,
- The quantity of material, usage conditions and usage frequency,
- Occupational exposure limit values and biological limit values of the product,
- Effect of the preventive measures taken or to be taken,
- The results of previous health surveillance if available,
- Interactions of the materials with each other and together in the works performed using more than one hazardous/chemical material.

Additional information required for the risk assessment will be obtained from the supplier or other sources. This information will include, if available, specific risk assessments of the materials found in the applicable legislation, for users.

A new activity involving hazardous/chemical materials will only be initiated after taking measures determined by the risk assessment.

Employees who are determined to be at risk in terms of health as a result of the risk assessment will be subjected to appropriate health surveillance. If, as a result of the health surveillance, an identifiable disease or adverse health effect is observed in the employee exposed to the hazardous chemical substance in the workplace, or if it is determined that the biological limit value has been exceeded, the employee will be informed of the situation and the necessary information and recommendations will be given regarding the necessary health surveillance. In this case, the risk assessment will be reviewed and renewed if necessary.

The recommendations of the occupational physician, occupational safety specialist, other specialists or Ministry of Labor and Social Security officials will be taken into account in taking the necessary measures to prevent or reduce the risk, including removing the employee from his/her job and employing him/her in another job where there is no risk of exposure to hazardous chemicals. If there will be other employees exposed to hazardous chemicals, their health status will be checked, and these employees will be kept under constant health surveillance.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project

for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
HMMP-1	Hazardous Material Inventory	It will be checked that SDSs of all hazardous materials permitted to enter the site are obtained and registered in the hazardous material inventory.	EPC and its sub-contractor	Monthly
HMMP-2	Handling	The following records will be collected and maintained on hazardous materials: <ul style="list-style-type: none"> reconciled bulk inventory, weekly use summaries, weekly reconciliation for a storage area, reports of leaks or losses, reports of spill responses, SDSs. 	EPC and its sub-contractor	Weekly
HMMP-3	Labels	Labels of the hazardous materials will be visually checked.	EPC and its sub-contractor	Continuously
HMMP-4	Storage Area	Storage areas will be controlled visually.	EPC and its sub-contractor	Continuously
HMMP-5	Training	Training will be given to employees.	EPC and its sub-contractor	At least 2 times a year As required
HMMP-6	Grievance	A number of grievances received regarding hazardous material management will be recorded.	EPC and its sub-contractor	Continuously
HMMP-7	Storage	Up-to-datedness of the hazardous material inventory	EPC and its sub-contractor	Continuously

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the hazardous material management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
HMMP-KPI-1	Inspections completed vs. planned	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
HMMP-KPI-2	Hazardous material management-related training completed vs. planned	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
HMMP-KPI-3	Total % of hazardous material management related non-conformities closed within the agreed timeframe	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%
HMMP-KPI-4	Total % of hazardous material management related grievances closed within the agreed timeframe	Kalyon Enerji/ Contractors/ Subcontractors	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This Plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.

APPENDIX A – HAZARDOUS MATERIAL STORAGE MATRIX

Class	Flammable Gases	Flammable and Non-Toxic Gases	Toxic Gases	Flammable Liquids	Flammable Solids	Self-igniting	Hazardous in Contact with Water	Oxidizer	Organic Peroxide	Toxic	Corrosive
Flammable Gases	A	E	C	B	B	D	B	D	D	C	B
Flammable and Non-Toxic Gases	E	A	B	E	E	E	E	B	E	B	B
Toxic Gases	C	B	A	C	C	C	C	C	C	B	B
Flammable Liquids	B	E	C	A	B	D	B	D	D	C	B
Flammable Solids	B	E	C	B	A	D	B	D	D	C	B
Self-igniting	D	E	C	D	D	A	B	D	D	C	B
Hazardous in Contact with Water	B	E	C	B	B	B	A	D	D	C	D
Oxidizer	D	B	C	D	D	D	D	A	D	F	D
Organic Peroxide	D	E	C	D	D	D	D	D	A	F	D
Toxic	C	B	B	C	C	C	C	F	F	A	B
Corrosive	B	B	B	B	B	B	D	D	D	B	G

A- Hazardous substances of the same class are generally considered compatible.

B- Substances in this class are generally non-reactive, with the exceptions stated in the safety data sheet. However, the risks regarding compatibility of substances should be considered. For example, in the event of a spill, leak or fire, the second substance may cause different hazards or increase the risk. Therefore, additional control measures are required.

C- Substances in these two classes are generally considered to be non-reactive, but the possibility of dangerous scenarios should also be considered. For example, in the event of fire, the risk of the release of toxic gases will increase.

D- It is possible for the dangerous substances of these two classes to react. In some cases the reaction; may result in fire, explosion, release of toxic or corrosive gases. If one of these substances is burned, the presence of the other in the environment may accelerate the fire. These substances should not be stored together or in close proximity, except where the risk is fully controlled.

E- If flammable and non-toxic gases have oxidizing properties, D applies, otherwise B applies.

F- D applies if toxic substances are also flammable substances, otherwise B applies.

G- D if one substance is concentrated strong acid and the other strong alkaline, otherwise A applies.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

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Human Rights Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
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1 INTRODUCTION

This document is the Human Rights Management Plan (HRMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). In accordance with the requirements of Good International Industry Practices (GIIP), Equator Principles IV (dated July 2020), internationally recognized Human Rights, and implementation of the United Nations (UN) Guiding Principles on Business and Human Rights (2011), Kalyon Enerji will develop and implement a management process that will ensure respect for Human Rights. Every human being should be treated with dignity and equality, according to international standards on human rights.

The Plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least 2 months before operation and updated at least 1 year before decommissioning.

The requirements set out in this HRMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This HRMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC, its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is;

- To define the scope and applicable interphases for the human rights management during all project activities,
- To define project standards in terms of components,
- To define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- To manage components and monitor Project performance,

- To define training requirements, monitoring measures and Key Performance Indicators.

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety, and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Finance Institution
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
HRMP	Human Rights Management Plan
H&S	Health and Safety
IFC	International Finance Corporation
ILO	International Labour Organization
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation
WGRM	Workers Grievance Redress Mechanism

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

The Constitution of the Republic of Turkey is the fundamental legal document guaranteeing respect to Human Rights as stated in Article 2 of Chapter II of the Constitution:

"The Republic of Turkey is a democratic, secular and social state governed by rule of law, within the notions of public peace, national solidarity and justice, respecting human rights, loyal to the nationalism of Atatürk, and based on the fundamental tenets set forth in the preamble."

The following national legislation and international conventional will be applicable to the Project:

- Constitution of the Republic of Turkey
- The Law on the Human Rights and Equality Institution of Turkey (TIHEK) (Law No. 6701, 2016)
- Labor Law (Law No. 4857, 2003) and related regulations
- Occupational Health and Safety Law (Law No. 6331, 2012) and related regulations
- Regulation on the Implementation of the Law Concerning Private Security Services

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

As established in IFC PS 1 “Assessment and management of Environmental and Social Risks and Impacts”, paragraphs 2 and 14, IFC clients are responsible for managing their contractors’ environmental and social performance: “Contractors retained by, or acting on behalf of the client(s), are considered to be under direct control of the client and not considered third parties. . .” and the environmental and social management “. . . programs may apply broadly across the client’s organization, including contractors and primary suppliers over which the organization has control or influence . . .”.

IFC PS 2 Labour and Working Conditions, proper human resources management, respect for workers’ rights, including freedom of association and the right to collective bargaining, and promotion of workers’ health are key to the sustainability of an enterprise. Management of non-employee workers, the process of redundancy and grievances arising at the workplace are also covered by the standard.

In addition, the following international standards will be applicable to the Project:

- International Labor Organization (ILO) conventions ratified by Turkey
- Guidance Note on Implementation of Human Rights Assessments under EPs (2020)
- IFC Good Practice Note on Managing Contractors’ E&S Performance (2017)
- IFC Good Practice Handbook on Use of Security Forces: Assessing and Managing Risks and Impacts (2017)
- IFC/EBRD Worker’s Accommodation: Processes and Standards (2009)
- IFC Handbook for Addressing Project-Induced In-Migration (2009)
- IFC Good Practice Note on Addressing Grievances from Project-Affected Communities (2009)
- IFC Introduction to Health Impact Assessment (2009)
- IFC Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
- World Group Bank (WBG) General and Sector Specific Environmental, Health and Safety (EHS) Guidelines (2007)

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have labor management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)

- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Organization Chart

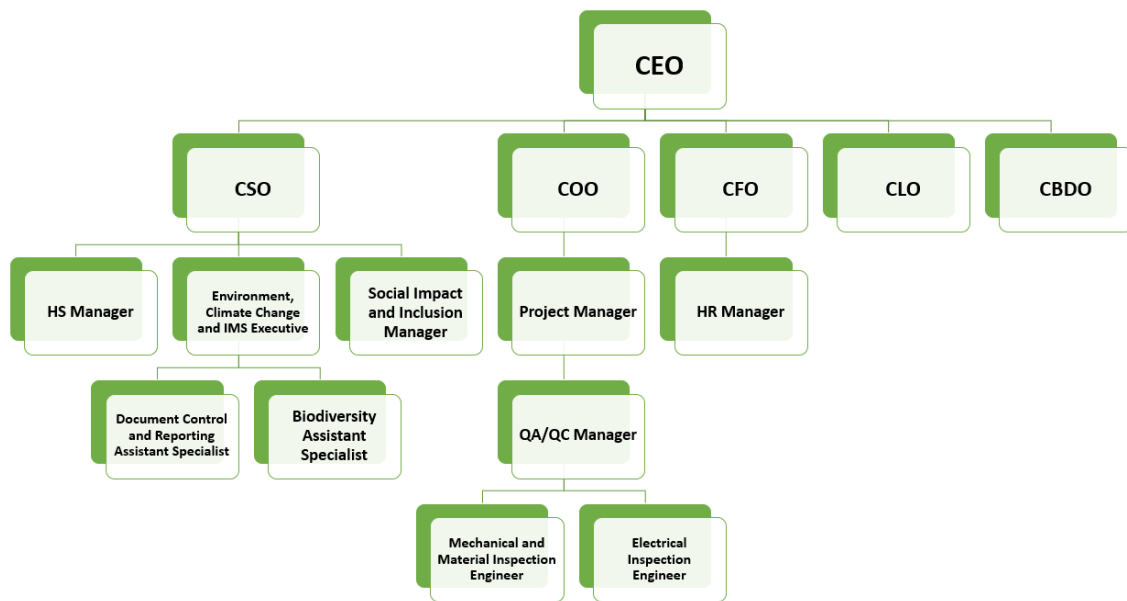


Figure 1: Organization Structure of the Kalyon Enerji

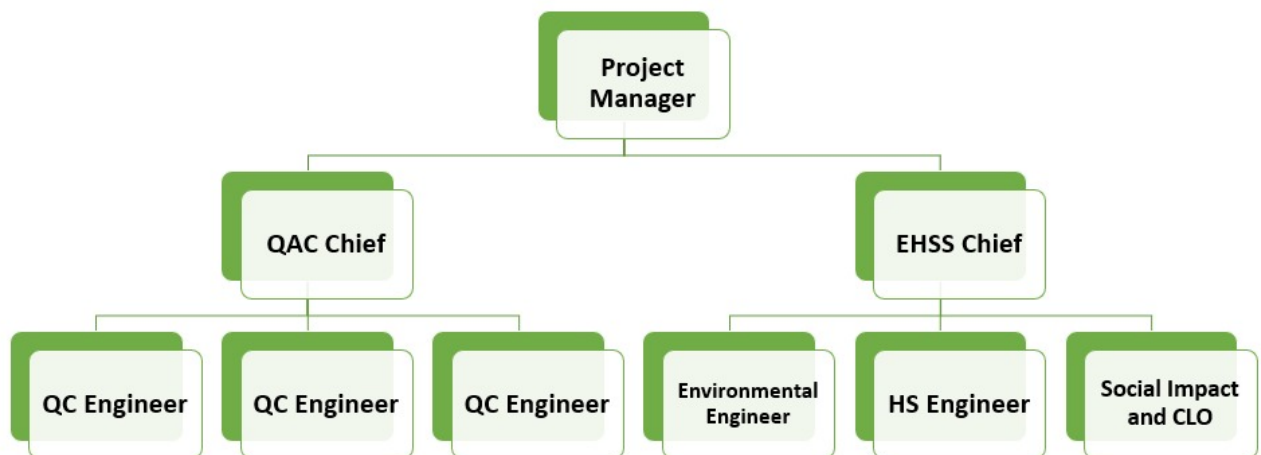


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this Plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Human Resource Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the performance of this Plan. Conduct/organize periodic audits. Take role in the appeals committee of Kalyon Enerji regarding the unsolved labor related grievances.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits.

Roles	Responsibilities
	<ul style="list-style-type: none"> Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC- Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Support effective implementation of this Plan. Support internal grievance redress mechanism in collaboration with social impact and stakeholder engagement specialist. Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this Plan for the personnel they are responsible for. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the EHSS Chief. Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

4.1 General Principles

Human Rights will be managed according to the following principles:

- Strive for continuous improvement in upholding and respecting Human Rights through ongoing dialogue with internal and external stakeholders.
- Continue to avoid all forms of child labor, forced labour and modern slavery for all activities in which the Project are engaged and across the entire supply chain.
- Avoid discrimination against any individual based on race, color, national or ethnic origin, religion, age, sex, sexual orientation, sexual minorities, religious minorities, ethnic minorities, gender identity or expression, marital status, family status, pregnancy, disability, genetic characteristics or any other arbitrary characteristic unrelated to the individual's job performance.
- Promote diversity at all levels of the Project.
- Enhance employment, supply chain, training and community investment programs to advance the socio-economic empowerment of women in communities and eliminate barriers to the advancement and fair treatment of women in workplaces.
- Respect the collective and customary rights of local peoples near the Project construction and operation areas and ensure consultation with all relevant stakeholders.
- Establish confidential mechanisms to identify, receive and respond to Human Rights and ethical concerns from any stakeholder in an objective manner.
- Take action to terminate any contracts or arrangements with the EPC, subcontractors and suppliers should the Client becomes aware that their practices and performance conflict with the requirements of this Human Rights Policy.
- When working with public or private security forces, implement a security approach consistent with the Voluntary Principles on Security and Human Rights.

In further detail, the HRMP serves the following purposes:

- Incorporate respect for Human Rights into management, governance practices and programs as defined in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.
- Ensure that EPC, subcontractors, suppliers and business partners share this commitment to Human Rights – including those in regard to working conditions, freedom of association, freedom of speech, collective bargaining, maximum working hours, fair wages and benefits, equal opportunity and freedom from discrimination.
- Define the roles and responsibilities within Kalyon Enerji for the management of Human Rights related issues.
- Continually review and evaluate changing Human Rights conditions in the jurisdictions in which the Project operate.

4.1.1 Human Resources Policy and Procedure

- The Project has been adopted and will implement a Human Resources Policy appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of the PS2

and national law.

- The Project will require its EPC and its subcontractors to adopt and implement human resources policy and procedure aligned with Project's policy and procedure and with this Plan. Kalyon Enerji will perform periodic audits of its EPC and subcontractors to ensure that the policy and procedure are adopted and implemented.

4.1.2 Non-Discrimination and Equal Opportunity

- Kalyon Enerji will strictly prohibit any discrimination on the basis of race, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran's status or any other characteristic protected by law.
- Turkish Labor Law forbids discrimination due to race, language, gender, political views and opinion and religion. In accordance with the equal treatment principle covered in article 5 of the Turkish Labor Law, employers should treat part time workers with the same rights as full time workers and indefinite period workers to definite period workers unless there are genuine reasons for not doing so. As Kalyon Enerji will comply with the Turkish Labor Law and will base the employment relationships on the principle of equal opportunity and fair treatment, the Turkish standards will fulfil the requirements of PS2 with regard to ensuring non-discrimination.
- Employment decisions, such as recruitment, dismissal, promotion, will be transparent and will not be made (directly or indirectly) based on personal characteristics such as sex, race, nationality, etc., but rather on the ability to do the job.
- An Employee's Code of Conduct is part of the Human Resources Directive of Kalyon Enerji and will be implemented in the Project, indicating that the non-discrimination, equal treatment, and prohibition of harassment in the workplace, commitment on continual improvement, consultation and participation of workers will be promoted.

4.1.3 Collective Bargaining and Freedom of Association

- The Project will endeavor to work in good faith with trade unions and any other bodies that workers collectively choose for their formal representation. Organized workforces are common in Türkiye.
- The Project will not seek to prevent by any means whatsoever the formation of trade unions or any other legally established worker group(s).
- Kalyon Enerji, EPC and its subcontractors will comply with Turkish Labor Law concerning relations with authorized labor organizations and workers representatives.
- In the case of a stoppage of work or strike Kalyon Enerji will ensure that relevant managers, EPC and other parties are informed promptly so that appropriate engagement and action can be undertaken to resolve the issue.
- In the event of stoppage or strike, Kalyon Enerji will arrange meetings with designated labor/worker representatives to determine the cause and to discuss and agree on resolutions; and
- If necessary, the relevant requirements of the Labor Law will be exercised, including using legal mediation and other means of arbitration.

4.1.4 Avoidance Child and Forced Labor

- The employment of children (i.e., persons below the age of 18) for the Project will not be permitted. The same requirement will be applicable to EPC and subcontractors.

- Periodic audits of EPC and subcontractors will be performed by Kalyon Enerji, EPC and its subcontractors to ensure that no employment of children occurs.
- The employment of forced labor (i.e., any work not voluntarily performed and that is exacted from an individual under threat of force or penalty) for the Project will not be permitted. The same requirement will be applicable to Project EPC and subcontractors.
- Periodic audits of EPC and subcontractors will be performed by Kalyon Enerji to ensure that no forms of forced labor occur.

4.1.5 Right to Abstain from Work

- In the event of serious, imminent, and unavoidable danger, workers shall leave their workstation or dangerous area and proceed to a safe place. Workers will not be placed at any disadvantage due to their action.

4.1.6 Right to Social Security, Including Social Insurance

- Social insurance payments of all direct and indirect workers will be strictly controlled by Kalyon Enerji.
- If required awareness meetings will be held with the Project workers.

4.1.7 Women Employment

- Equal wage policy for equal positions between men and women workers will be implemented.
- When man and women candidates meet all conditions equally, priority should be provided to women candidates during the recruitment process.
- The safety of women staff staying in the accommodation camps will be provided at a high level and their needs will be met.

4.1.8 Grievance Redress Mechanism

- A separate Workers Grievance Redress Mechanism (WGRM) will be established, developed and implemented for the Project workers including EPCs' and subcontractors' workforce of the Project. WGRM will be designed specifically to record and track of the process of "grievances," "complaints," "feedback," "question" or another functionally equivalent term expressing the workers' concerns or complaints. Workers will be able to raise their complaints relating to their work environment or work conditions. The person responsible for the WGRM will be the EPC's Personnel Affairs Chief during construction and the HR Manager of Kalyon Enerji during operation. For details, please refer to Stakeholder Engagement Plan.
- All direct and indirect workers will be informed about the WGRM during recruitment, during induction training and periodically during other training and communication activities.
- A Grievance Redress Mechanism will be developed and implemented, for external individuals or groups to submit grievances relative to Project activities. The Grievance Mechanism will aim at facilitating the resolution of concerns and grievances about the Project's environmental and social performance.
- Local communities will be informed about the Grievance Redress Mechanism through the Stakeholder Engagement Plan and through the engagement activities that will be implemented during the Project's entire lifecycle.
- The Grievance Redress Mechanism and the WGRM will be subject to monitoring and to periodic auditing to ensure that they are implemented correctly and effectively.

4.1.9 Freedom of Expression

- Individuals and groups will have the possibility of expressing their thoughts and opinions freely on the Project during engagement activities and through the Grievance Mechanism.

4.1.10 Right to Information

- The Stakeholder Engagement Plan has been prepared for the Project and will be implemented in all phases of the Project.
- ESIA disclosure activities will be performed in order to inform all stakeholders about the Project impacts.
- During the construction, operation and decommissioning periods of the Project, all stakeholders will be informed about the status of the Project by using various tools including the face-to-face meetings, Project website, media.

4.1.11 Privacy and Confidentiality of the Data

- A Letter of Commitment and Consent for Confidentiality and Personal Data Protection Law is part of the Human Resources Policy and Code of Conduct of Kalyon Enerji and will be implemented in the Project,
- All information on workers will be stored securely within Kalyon Enerji's storage systems and will be accessible only to competent staff.
- Appropriate measures will be implemented to avoid theft or loss of information on workers from Kalyon Enerji's storage systems.
- No confidential information on workers will be shared externally and provided to Authorities without the individual's permission.

4.1.12 Security Management

- Before the construction, operation and decommissioning phases, local communities will be informed about the restrictions to entering the Project site.
- Security personnel will patrol the site to prevent any unauthorized access.
- Community Health and Safety Management Plan will be implemented, outlining expectations around security.
- Conflict Management Training will be provided to armed security personnel.

4.2 Recruitment Process

- Transparent and fair recruitment process will be set up and implemented.
- A single and central recruitment process will be used to hire workers. No other channels will be allowed to be used. Likewise hiring at the gate will not be allowed, to avoid influx in the Project area of persons looking for employment opportunities.
- During the recruitment process, candidates will be provided with clear and transparent information on wages, benefits and working conditions.

4.3 Labor and Working Conditions

4.3.1 Working Hours and Conditions

- All workers will be provided with a written contract. The contracts as a minimum will include information on terms and conditions of employment, including the period of employment, wages, hours of work,

overtime arrangements, procedures for termination of the contract and any benefits. The contract will be in the native language of the worker, and it will be clear and understandable to the worker. A copy of contract will be given to the worker.

- Necessary measures will be ensured for the safety and health protection of workers, including prevention of occupational risks and provision of information and training, as well as provision of the necessary organization and means and shall ensure that these measures are adjusted taking account of changing circumstances and aim to improve existing situations.
- Working hours and overtime issues are regulated by Governmental Authorities under the Labor Law (No. 4857). Implementations shall vary from Client to EPC/subcontractors for benefit of employees but however must be in line, at minimum, with Labor Law.
- Shift schedule of the direct and indirect workers will be strictly monitored and the annual overtime working hours will not exceed the working time and in compliance with the Labor Law annual overtime shall not exceed 270 hours.
- In compliance with the article 44 of the Labor Law, the issue of whether work will be done or not on the national day and public holidays will be decided by the collective agreement or by employment contracts. The worker's consent is required if there is no provision in the collective agreement or in employment contracts.
- Workers will be free to terminate their employment in accordance with national law.
- Weekly working hours may be allocated to different days of the week, provided that they shall not exceed eleven hours per day. In this case, the average weekly working time of the worker within two months cannot exceed the normal weekly working time. The equalization period can be increased up to four months with collective bargaining agreements. The works carried out in this way can be compensated by giving rest periods in accordance with the determined working system and legislation:
 - Fifteen minutes for jobs of four hours or less
 - Half an hour for jobs lasting more than four hours and up to seven and a half hours (including seven and a half hours)
 - One hour for jobs lasting more than seven and a half hours
- Working hours and days may be rearranged, including working from home, flexible working model, balancing based work, rotation work, shift system, taking into account the characteristics of work and workplaces, and transition may be made between these systems.
- The personnel shall perform the work assigned to him/her within daily normal working time and the units shall be organized in a way that shall not require overtime.
- Work exceeding forty-five hours per week is considered overtime. The wage to be paid for each hour of overtime is paid by increasing the amount per hour of the normal working wage by fifty percent in weekdays and hundred percent in weekends.
- The worker who works overtime can use one hour and thirty minutes as free time for each hour of overtime work, instead of an increased wage for the overtime hours. The worker uses the free time within six months, within the working hours and without any deduction in her/his wages.
- Total overtime hours cannot exceed two hundred and seventy hours in a year.
- For Client implementation, the monthly wage of the personnel could be determined by taking into consideration overtime wages within the legal limits corresponding to two hundred and seventy hours

per year. No additional payment shall be made for the periods worked within this two-hundred-and-seventy-hour limit and equalization permit shall not be used.

- Payroll records of the direct and indirect workers will be controlled by Kalyon Enerji strictly.
- All workers will be paid equally for equal positions unless any difference in pay can be justified.
- The annual leave shall be granted to the personnel working for at least one year, including the probationary period, as of the date of commencement of work. Annual leave periods are applied as follows as their employment date and seniority. Annual leave periods are regulated under the Labor Law and implementations shall vary from Client to EPC/subcontractors however must be in line, at minimum, with Labor Law. Even the Labor Law specified the minimum durations for leave periods, Client or EPC/subcontractors may extend duration of the leave periods for benefit of employees.
- The calculation of the time required to qualify for annual paid vacation is determined according to the employment dates and the time spent by the personnel in the same and affiliated employers in different workplaces is taken into consideration.
- Personnel should use its annual paid leave right on actual basis within the relevant year.
- In the event that the employment contract is terminated for any reason, the worker's wage for the annual leave periods that he is entitled to but not used shall be paid to him/her or to the beneficiaries over the wage on the date of termination of the contract. The statute of limitations regarding this wage starts from the date of termination of the employment contract.

4.3.2 Accommodation

Workers' accommodation standards provided in Camp Site and Offsite Accommodation Management Plan will be implemented within the scope of the Project, in line with the IFC/ EBRD's Guidance Note on Worker's Accommodation, 2009.

4.3.3 Occupational Health and Safety

- Workers will be provided with safe and healthy working conditions.
- Workers will be provided with adequate Occupational Health and Safety training regarding the use and maintenance of the workplace environment, tools, machinery, and equipment.
- Workers will be provided with all the necessary Personal Protection Equipment for the positions and activity carried out.
- All workers should be followed up against their COVID-19 case situations and they will be subjected to the testing process when healthcare professionals deem it necessary and suspect according to the symptoms.
- Vulnerable workers will be identified (older workers, those with underlying health conditions etc.) and will be monitored by the occupational physician.

4.4 Retrenchment

- Prior to implementing any collective dismissals in connection with the Project, an analysis of alternatives to retrenchment will be carried out. If the analysis does not identify viable alternatives to retrenchment, HR Specialist of the Project will develop and implement a retrenchment plan to assess, reduce and mitigate the adverse impacts of retrenchment on workers, in line with national law and good international industry practices and based on the principles of non-discrimination and consultation. The selection process for retrenchment will be transparent, based on fair, objective, consistently applied

criteria, and subject to an effective grievance mechanism. Kalyon Enerji, EPC and its subcontractors will provide reasonable notice of changes to employment conditions to the unions concerned (where they exist), and to workers and their representatives and, where appropriate, relevant public authorities. This consultation will aim to reduce and mitigate potential adverse effects of job losses on the workers concerned. The outcome of the consultations will be reflected in the final retrenchment plan. All outstanding back pay and social security benefits and pension contributions and benefits will be paid: (i) on or before termination of the working relationship to the workers; (ii) where appropriate, at a point in time agreed with the worker; or (iii) payment will be made in accordance with a timeline agreed through a collective agreement.

5 TRAINING & AWARENESS

All employees including employees of EPC and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily tool-boxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

EPC, its sub-contractors are responsible to record the incidents etc. on a monthly basis and report to the Kalyon Enerji during construction. Kalyon Enerji is responsible to record the incidents etc. on a monthly basis during operation. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the EPC supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
HRMP-1	EPC and subcontractors' policies and procedures	Ensuring that HR Policy of the Project is adopted and implemented by EPC and subcontractors, and that they are compliant with Kalyon Enerji's policy and procedure.	Kalyon Enerji	During procurement Annually
HRMP-2	EPCs' recruitment process	Supervising contractor's HR policies, auditing their recruitment processes	Kalyon Enerji	Quarterly
HRMP-3	Employment	Analysis of records of man/woman workforce ratio, including those in managerial positions (supervisors and above)	EPC and its sub-contractor	Monthly

ID	Topic	Method	Responsibility	Frequency
HRMP-4	Employment	Statistical trend of cases of discrimination or harassment reported	EPC and its sub-contractor	Monthly
HRMP-5	Employment	Statistical trend community/worker grievances submitted, processed, and resolved	EPC and its sub-contractor	Monthly
HRMP-6	Training	Percentage of workers completing mandatory trainings	EPC and its sub-contractor	Monthly
HRMP-7	Implementation	Review of compliance records by Kalyon Enerji	Kalyon Enerji	Quarterly (Construction) Annually (Operation)
HRMP-8	Accommodation	Please refer to Camp Site and Offsite Accommodation Management Plan		

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the human rights management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Target
HRMP-KPI-1	Percentage of workers who received HR orientation at employment (during first week of employment)	Kalyon Enerji/ EPC and its sub-contractor	100%
HRMP-KPI-2	Increase in number of women employees from the beginning of the Project until the end of the Project.	Kalyon Enerji/ EPC and its sub-contractor	10%
HRMP-KPI-3	Number of cases of discrimination or harassment reported	Kalyon Enerji/ EPC and its sub-contractor	Zero
HRMP-KPI-4	Number of cases of child labor reported	Kalyon Enerji/ EPC and its sub-contractor	Zero
HRMP-KPI-5	Number of cases of forced or compulsory labor reported	Kalyon Enerji/ EPC and its sub-contractor	Zero
HRMP-KPI-6	Number of cases involving rights of stakeholders (freedom of expression, right to information, privacy, and confidentiality of the data, right to abstain from work, collective bargaining and freedom of association, women equality, OHS, accommodation etc.)	Kalyon Enerji/ EPC and its sub-contractor	Zero
HRMP-KPI-7	Inspections completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	100%
HRMP-KPI-8	Workers' training on policies and procedures concerning aspects of Human Rights (including security	Kalyon Enerji/ EPC and its sub-contractor	100%

ID	Key Performance Indicator	Responsibility	Target
	personnel) completed vs planned		
HRMP-KPI-9	Total % of non-conformities regarding human rights issues closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	100%
HRMP-KPI-10	Total % of grievances regarding human rights issues closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

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Labor Management Plan

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1 INTRODUCTION

This document is the Labor Management Plan (LMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project (“the Project”). This LMP sets out the requirements for management of social impacts, particularly with regard to the labor management during implementation of the Project.

The Plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least 2 months prior to operation and updated at least 1 year prior to decommissioning.

The requirements set out in this LMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. (“Kalyon Enerji”) and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. (“Client”), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)’s Common Approaches.

1.1. Scope

This LMP applies to all Project activities under the Client’s supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC, its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is;

- To define the scope and applicable interphases for the labor management during all project activities,
- To define project standards in terms of components,
- To define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- To manage components and monitor Project performance,
- To define training requirements, monitoring measures and Key Performance Indicators.

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety, and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism
GIIP	Good International Industry Practices
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
ILO	International Labour Organization
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
LMP	Labor Management Plan
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation
WGRM	Workers Grievance Redress Mechanism

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Law on Occupational Health and Safety (No. 6331)
- Law on Labor (No. 4857)
- Law on Social Security and General Health Insurance (No. 5510)
- Regulation on Manual Handling Operations
- Regulation on Health and Safety Measures in Working with Chemical Substances
- Regulation on Use of Personal Protective Equipment at Workplaces
- Regulation on Health and Safety Signs
- Regulation on Dust Control
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on Protection of Workers from Noise Related Risks
- Regulation on Protection of Workers Against Hazards of Explosive Environments
- Regulation on Protection of Workers from Vibration Related Risks
- Regulation on Principles and Procedures for Occupational Health and Safety Training of Employees
- Regulation on Health and Safety Conditions on the Use of Work Equipment
- Regulation on Duties, Authorities, Responsibilities and Trainings of Workplace Physician and Other Health Personnel
- Regulation on Risk Assessment of Occupational Health and Safety
- Regulation on Emergency Situations in the Workplaces
- Regulation on The Vocational Education of Those to Be Worked in Dangerous and Very Dangerous Class Jobs

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate

Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.

- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

As established in IFC PS 1 "Assessment and management of Environmental and Social Risks and Impacts", paragraphs 2 and 14, IFC clients are responsible for managing their contractors' environmental and social performance: "Contractors retained by, or acting on behalf of the client(s), are considered to be under direct control of the client and not considered third parties. . ." and the environmental and social management ". . . programs may apply broadly across the client's organization, including contractors and primary suppliers over which the organization has control or influence . . .".

The international standards which Kalyon Enerji, EPC and its subcontractors will implement are those set by the IFC and International Labour Organization (ILO).

IFC PS 2 Labour and Working Conditions, proper human resources management, respect for workers' rights, including freedom of association and the right to collective bargaining, and promotion of workers' health are key to the sustainability of an enterprise. Management of non-employee workers, the process of redundancy and grievances arising at the workplace are also covered by the standard.

Kalyon Enerji, EPC and its subcontractors will comply with the requirements of IFC PS 2 and Workers' Accommodation: processes and standards (a guidance note by IFC and the EBRD) when implementing its policies.

International labour standards are legal instruments drawn up by the ILO's constituents (governments, employers and workers) and setting out basic principles and rights at work. They are legally binding international treaties that may be ratified by member states. In many cases, a Convention lays down the basic principles to be implemented by ratifying countries. Within this regard, there are total of 59 conventions ratified by Türkiye, of which 55 are in force, 3 instrument abrogated; none have been ratified in the past 12 months. The related ones to this employment plan are listed below:

- C29: Forced Labour (Ratification by Turkey: 1998)
- C 100: Equal Remuneration (Ratification by Turkey: 1967)
- C 105: Abolition of Forced Labour (Ratification by Turkey: 1961)
- C111: Discrimination (Ratification by Turkey: 1967)
- C138: Minimum Age (Ratification by Turkey: 1998)
- C182: Worst Forms of Child Labour (Ratification by Turkey: 2001)

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have labor management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

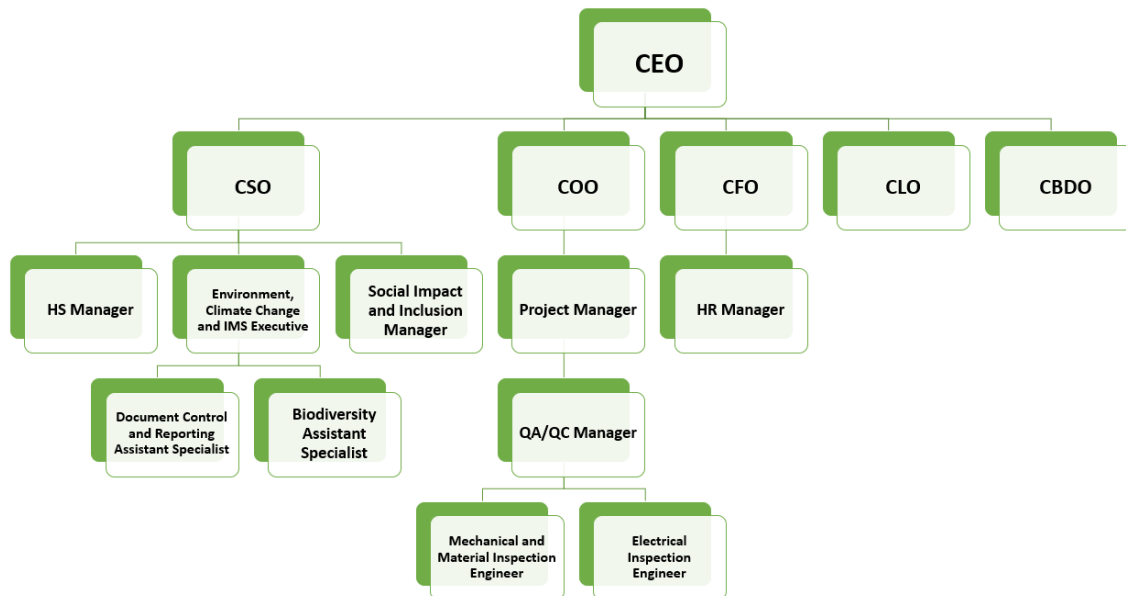


Figure 1: Organization Structure of the Kalyon Enerji

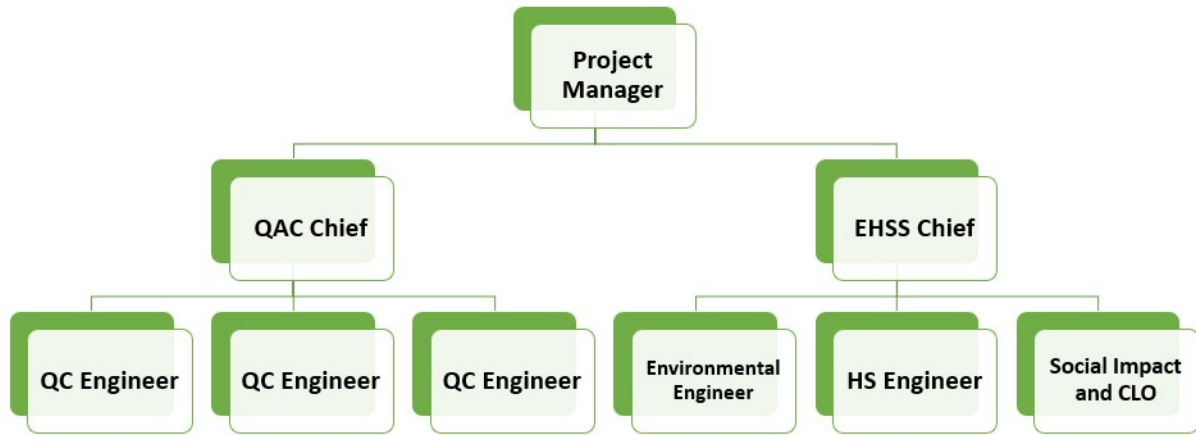


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this Plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Human Resource Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the performance of this Plan. Conduct/organize periodic audits. Take role in the appeals committee of Kalyon Enerji regarding the unsolved labor related grievances.

Roles	Responsibilities
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> • Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> • Ensure adequate resources are provided for implementation of this Plan. • Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. • Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> • Ensure this plan is implemented according to the Project standards. • Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. • Ensure all relevant topics followed are reported to Kalyon Enerji • Obtain data from sub-contractors regarding activities defined in this Plan. • Organize trainings related to this Plan. • Conduct periodic internal audits. • Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). • Conduct periodical site visits/audits. • Ensure site activities are implemented according to applicable H&S requirements. • Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. • Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC- Personnel Affairs Chief</i>	<ul style="list-style-type: none"> • Support effective implementation of this Plan. • Support internal grievance redress mechanism in collaboration with social impact and stakeholder engagement specialist. • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment and training. • Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. • Organize the trainings related to this Plan for the personnel they are responsible for. • Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> • Control incoming and outgoing traffic at all times. • Report all security issues to the EHSS Chief. • Involve in the investigation team for the investigation of the security incidents. • Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. • Ensure all mitigation measures and management controls are implemented properly. • Ensure that only properly trained and qualified security personnel are employed. • Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.

Roles	Responsibilities
Sub-contractors	<ul style="list-style-type: none"> • Develop its own procedure to fully implement this Plan. • Ensure compliance with Project standards and contractual agreements. • Ensure related non-compliances are recorded and responded to immediately. • Conduct internal audits and record identified incompliances. • Provide related trainings. • Appoint a responsible person for activities defined in this Plan. • Provide staff, equipment and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
All Employees	<ul style="list-style-type: none"> • Participate in the trainings. • Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

4.1 General Principles

4.1.1 Human Resources Policy and Procedure

- The Project has adopted and implemented a Human Resources Policy appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of the PS2 and national law.
- The Project will require its EPC and its subcontractors to adopt and implement human resources policy and procedure aligned with Project's policy and procedure and with this Plan. Kalyon Enerji will perform periodic audits of its contractors and subcontractors to ensure that the policy and procedure are adopted and implemented.

4.1.2 Non-Discrimination and Equal Opportunity

- The Project will strictly prohibit discrimination against any worker or applicant for employment on the basis of race, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, veteran's status or any other characteristic protected by law.
- Turkish Labor Law forbids discrimination due to race, language, gender, political views and opinion and religion. In accordance with the equal treatment principle covered in article 5 of the Turkish Labor Law, employers should treat part time workers with the same rights as full time workers and indefinite period workers to definite period workers unless there are genuine reasons for not doing so. As Kalyon Enerji, EPC and its subcontractors will comply with the Turkish Labor Law and will base the employment relationships on the principle of equal opportunity and fair treatment, the Turkish standards will fulfil the requirements of PS2 with regard to ensuring non-discrimination.

4.1.3 Child and Forced Labor

- The employment of children (i.e., persons below the age of 18) for the Project will not be permitted. The same requirement will be applicable to Project contractors and subcontractors.
- Periodic audits of contractors and subcontractors will be performed by Kalyon Enerji, EPC and its subcontractors to ensure that no employment of children occurs.
- The employment of forced labor (i.e., any work not voluntarily performed and that is exacted from an individual under threat of force or penalty) for the Project will not be permitted. The same requirement

will be applicable to Project contractors and subcontractors.

- Periodic audits of contractors and subcontractors will be performed by Kalyon Enerji to ensure that no forms of forced labor occur.

4.1.4 Workers Grievance Redress Mechanism

- A separate Workers Grievance Redress Mechanism (GRM) will be established, developed and implemented for the Project workers including contractors' and subcontractors' workforce of the Project. WGRM will be designed specifically to record and track of the process of "grievances," "complaints," "feedback," "question" or another functionally equivalent term expressing the workers' concerns or complaints. Workers will be able to raise their complaints relating to their work environment or work conditions. The person responsible for the Worker's GRM will be the EPC's Personnel Affairs Chief during construction and the HR Manager of Kalyon Enerji during operation. For details, please refer to Stakeholder Engagement Plan.

4.2 Recruitment Process

- Transparent and fair recruitment process will be set up and implemented.
- A single and central recruitment process will be used to hire workers. No other channels will be allowed to be used. Likewise hiring at the gate will not be allowed, to avoid influx in the Project area of persons looking for employment opportunities.
- During the recruitment process, candidates will be provided with clear and transparent information on wages, benefits and working conditions.

4.3 Labor and Working Conditions

4.3.1 Working Hours and Overtime

- Working hours and overtime issues are regulated by Governmental Authorities under the Labor Law (No. 4857). Implementations shall vary from Client to contractor/subcontractors for benefit of employees but however must be in line, at minimum, with Labor Law.
- Weekly working time is forty-five hours, excluding those working with rotation models, and working days are as a rule weekday in offices (Monday to Friday) and 6 days in site (Monday to Saturday).
- Weekly working hours may be allocated to different days of the week, provided that they shall not exceed eleven hours per day. In this case, the average weekly working time of the worker within two months cannot exceed the normal weekly working time. The equalization period can be increased up to four months with collective bargaining agreements. The works carried out in this way can be compensated by giving rest periods in accordance with the determined working system and legislation:
 - Fifteen minutes for jobs of four hours or less
 - Half an hour for jobs lasting more than four hours and up to seven and a half hours (including seven and a half hours)
 - One hour for jobs lasting more than seven and a half hours
- Working hours and days may be rearranged, including working from home, flexible working model, balancing based work, rotation work, shift system, taking into account the characteristics of work and workplaces, and transition may be made between these systems.
- The personnel shall perform the work assigned to him/her within daily normal working time and the units shall be organized in a way that shall not require overtime.

- Work exceeding forty-five hours per week is considered overtime. The wage to be paid for each hour of overtime is paid by increasing the amount per hour of the normal working wage by fifty percent in weekdays and hundred percent in weekends.
- The worker who works overtime can use one hour and thirty minutes as free time for each hour of overtime work, instead of an increased wage for the overtime hours. The worker uses the free time within six months, within the working hours and without any deduction in her/his wages.
- Total overtime hours cannot exceed two hundred and seventy hours in a year.
- For Client implementation; the monthly wage of the personnel could be determined by taking into consideration overtime wages within the legal limits corresponding to two hundred and seventy hours per year. No additional payment shall be made for the periods worked within this two-hundred-and-seventy-hour limit and equalization permit shall not be used.

4.3.2 Annual Leaves

- The annual leave shall be granted to the personnel working for at least one year, including the probationary period, as of the date of commencement of work. Annual leave periods are applied as follows as their employment date and seniority. Annual leave periods are regulated under the Labor Law and implementations shall vary from Client to contractors/subcontractors however must be in line, at minimum, with Labor Law. Even the Labor Law specified the minimum durations for leave periods, Client or contractors/subcontractors may extend duration of the leave periods for benefit of employees.
- According to Labor Law, followings will be applied for annual leave grants:
 - Those having completed their one to five years of seniority: 14 Days,
 - Those having completed their five to fifteen full years of seniority: 20 Days,
 - For those with fifteen full years or more years of seniority: 26 Days,
- The calculation of the time required to qualify for annual paid vacation is determined according to the employment dates and the time spent by the personnel in the same and affiliated employers in different workplaces is taken into consideration.
- Personnel should use its annual paid leave right on actual basis within the relevant year.
- In the event that the employment contract is terminated for any reason, the worker's wage for the annual leave periods that he is entitled to but not used shall be paid to him/her or to the beneficiaries over the wage on the date of termination of the contract. The statute of limitations regarding this wage starts from the date of termination of the employment contract.

4.3.3 Working Hours and Overtime

Management measures to be applied within the camp sites and offsite accommodations during the Project works are detailed in Camp Site and Offsite Accommodation Management Plan.

4.4 Workers' Organizations

- The Project should endeavor to work in good faith with trade unions and any other bodies that workers collectively choose for their formal representation. Organized workforces are common in Türkiye.
- The Project will not seek to prevent by any means whatsoever the formation of trade unions or any other legally established worker group(s).
- Kalyon Enerji, EPC and its subcontractors will comply with Turkish Labor Law concerning relations with

authorized labor organizations and workers representatives.

- In the case of a stoppage of work or strike, Kalyon Enerji, EPC and its subcontractors will ensure that relevant managers, contractors and other parties are informed promptly so that appropriate engagement and action can be undertaken to resolve the issue.
- In the event of stoppage or strike, Kalyon Enerji, EPC and its subcontractors will arrange meetings with designated labor/worker representatives to determine the cause and to discuss and agree on resolutions; and
- If necessary, the relevant requirements of the Labor Law will be exercised, including using legal mediation and other means of arbitration.

4.5 Retrenchment

- Prior to implementing any collective dismissals in connection with the Project, an analysis of alternatives to retrenchment will be carried out. If the analysis does not identify viable alternatives to retrenchment, HR Specialist of the Project will develop and implement a retrenchment plan to assess, reduce and mitigate the adverse impacts of retrenchment on workers, in line with national law and good international industry practices and based on the principles of non-discrimination and consultation. The selection process for retrenchment will be transparent, based on fair, objective, consistently applied criteria, and subject to an effective grievance mechanism. Kalyon Enerji, EPC and its subcontractors will provide reasonable notice of changes to employment conditions to the unions concerned (where they exist), and to workers and their representatives and, where appropriate, relevant public authorities. This consultation will aim to reduce and mitigate potential adverse effects of job losses on the workers concerned. The outcome of the consultations will be reflected in the final retrenchment plan. All outstanding back pay and social security benefits and pension contributions and benefits will be paid: (i) on or before termination of the working relationship to the workers; (ii) where appropriate, at a point in time agreed with the worker; or (iii) payment will be made in accordance with a timeline agreed through a collective agreement.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily tool-boxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
LMP-1	EPC and subcontractors' policies and procedures	Ensuring that HR Policy of the Project is adopted and implemented by EPC and subcontractors, and that they are compliant with Kalyon Enerji's policy and procedure.	Kalyon Enerji	During procurement Annually
LMP-2	Employment	Analysis of records of man/woman workforce ratio, including those in managerial positions (supervisors and above)	Kalyon Enerji/ EPC and its sub-contractor	Monthly
LMP-3	Employment	Analysis of records of local/regional workforce ratio	EPC and its sub-contractor	Monthly
LMP-4	Employment	Statistical trend of worker grievances submitted, processed and resolved	EPC and its sub-contractor	Monthly
LMP-5	Training	Percentage of workers completing mandatory trainings	EPC and its sub-contractor	Monthly
LMP-6	Implementation	Statistical trend of cases of discrimination or harassment reported	EPC and its sub-contractor	Monthly
LMP-7	HR Policy	Percentage of contractors and subcontractors with HR policy	EPC and its sub-contractor	Annually
LMP-8	Accommodation	Please refer to Camp Site and Offsite Accommodation Management Plan		

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the labor management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
LMP-KPI-1	Percentage of workers who received HR orientation at employment (during first week of employment)	Kalyon Enerji/ EPC/ Subcontractors	Monthly	100%
LMP-KPI-2	Increase in number of women employees from the beginning of the Project until the end of the Project.	Kalyon Enerji/ EPC/ Subcontractors	Monthly	10%
LMP-KPI-3	Increase in number of local workforce from the	Kalyon Enerji/ EPC/ Subcontractors	Monthly	10%

ID	Key Performance Indicator	Responsibility	Frequency	Target
	beginning of the Project until the end of the Project.			
LMP-KPI-4	Number of cases of discrimination or harassment reported	Kalyon Enerji/ EPC/ Subcontractors	Monthly	Zero
LMP-KPI-5	Inspections completed vs. planned	Kalyon Enerji/ EPC/ Subcontractors	Weekly	100%
LMP-KPI-6	Labor and working conditions related trainings completed vs. planned	Kalyon Enerji/ EPC/ Subcontractors	Weekly	100%
LMP-KPI-7	Total % of non-conformities regarding labor issues closed within the agreed timeframe	Kalyon Enerji/ EPC/ Subcontractors	Monthly	100%
LMP-KPI-8	Total % of grievances regarding labor issues closed within the agreed timeframe	Kalyon Enerji/ EPC/ Subcontractors	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-ENV-PLN-0001

Pollution Prevention Plan

30 August 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	
01	Revisions as per the Client's comments	Whole Document
02	Revisions as per the Client's comments	Whole Document
03	Revisions as per the Client's comments	Whole Document

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1 INTRODUCTION

This document is the Pollution Prevention Plan (PPP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This PPP sets out the requirements for management of environmental impacts, particularly with regard to the prevention of pollution to land, air and water and noise emission during implementation of the Project.

The plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months prior to operation and updated at least one (1) year prior to decommissioning.

The requirements set out in this PPP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This PPP applies to all Project activities under the Client's supervision, EPC, sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractor will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management of air and noise emissions, discharges to environment, wastes and spills during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principle Financial Institution
EPs	Equator Principles
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PPP	Pollution Prevention Plan
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant
PSs	Performance Standards
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- Equator Principles (EPs) IV,
- IFC Performance Standards (PSs) and EHS Guidelines,

- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and
- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices and procedures

2.1 National Requirements

- Regulation on Environmental Impact Assessment
- Regulation on Environmental Permit and License

Air Quality

- Regulation on Control of Industrial Air Pollution
- Regulation on Control of Air Pollution caused by Heating
- Regulation on Assessment and Management of Air Quality
- Regulation on Ozone Layer Depleting Materials
- Regulation on Monitoring of Greenhouse Gas Emissions
- Communique on Monitoring and Reporting of Greenhouse Gases
- Regulation on Exhaust Gas Emission Control
- Regulation on the Reduction in the Sulphur Content of Some Fuel Types
- Regulation on Control of Odour-Generating Emissions

Noise and Vibration

- Regulation on the Environmental Noise Control
- Regulation Related to Noise Emissions by Equipment for Outdoor Use
- Type Approval Regulation on Exterior Noise Emissions and Exhaust Systems of Motor Vehicles
- Regulation on Machinery Safety

Water Quality

- Law on Groundwater, No. 167
- Regulation on Water Pollution Control
- Regulation on Protection of Groundwater against Pollution and Deterioration
- Regulation on Control of Pollution Caused by Hazardous Substances in Water and its Environment
- Regulation on Surface Water Quality
- Regulation on the Protection of Drinking-Utility Water Basins
- Regulation on Flood and Sedimentation Control
- Regulation on Preparation, Implementation and Follow-up of Basin Management Plans

- Regulation on Water Intended for Human Consumption
- Communiqué on Turkish Water Pollution Control Regulation Sampling and Analysis Methodology
- Communiqué on Turkish Water Pollution Control Regulation Administrative Procedures
- Wastewater Treatment/Deep Sea Discharge Facility Project Approval Circular” numbered 2018/4 and dated 20.11.2018

Soil Quality

- Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources
- Technical Guidelines for the Regulation on Soil Pollution Control and Contaminated Sites by Point Sources
 - Polluted Sites, Management System, Technical Document
 - Polluted Site, Investigation Technical Guidance Document
 - Polluted Site, Risk Assessment Technical Guidance Document
 - Polluted Site, Clean-Up, and Monitoring Technical Guidance Document
- Law on Protection of Soil and Land Use (No: 5403)

Waste Management

- Regulation on Waste Management
- Regulation on Zero Waste Management
- Regulation on Control of Excavation Soil and Construction, and Demolition Wastes
- Regulation on Control of Waste Batteries and Accumulators
- Regulation on Control of Vegetative Oils
- Regulation on Control of Medical Wastes
- Regulation on Control of End-of-Life Tires
- Regulation on Control of PCB and PCTs
- Regulation on Restriction of Some Hazardous Materials in Electrical and Electronic Devices
- Regulation on Control of Waste Oil
- Regulation on Control of End-of-Life Vehicles
- Regulation on Waste Incineration
- Regulation on Landfills (Regular Storage of Wastes)
- Regulation on Control of Packaging Wastes
- Regulation on Control of Waste Electrical and Electronic Equipment
- Communiqué on Recycling of Certain Non-Hazardous Wastes

Hazardous Materials

- Regulation on Radiation Safety
- Regulation on the Safe Transportation of Radioactive Materials
- Regulation on the Transportation of Hazardous Goods by Road
- Regulation on the Classification, Packaging, and Labelling of Materials and Mixtures
- Regulation on Safety Data Sheets on Hazardous Materials and Mixtures

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 3 - Resource Efficiency and Pollution Prevention recognizes that increased economic activity and urbanization often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels. There is also a growing global consensus that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the public health and welfare of current and future generations. At the same time, more efficient and effective resource use and pollution prevention and GHG emission avoidance and mitigation technologies and practices have become more accessible and achievable in virtually all parts of the world. These are often implemented through continuous improvement methodologies similar to those used to enhance quality or productivity, which are generally well known to most industrial, agricultural, and service sector companies.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and

cross-linkages to a number of other Management Plans which have pollution prevention implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

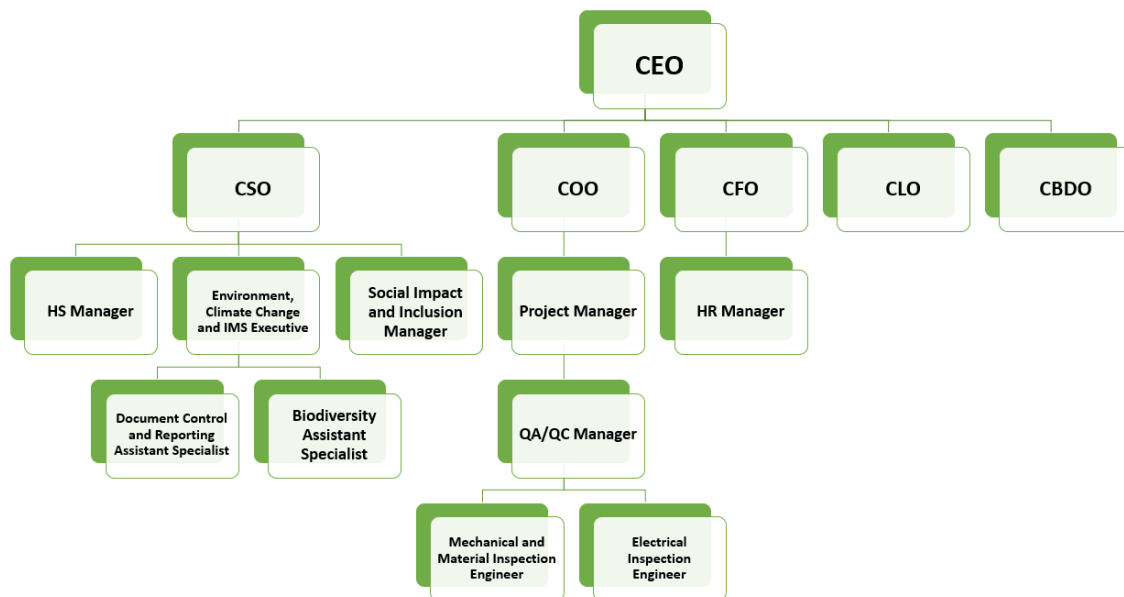


Figure 1: Organization Structure of the Kalyon Enerji

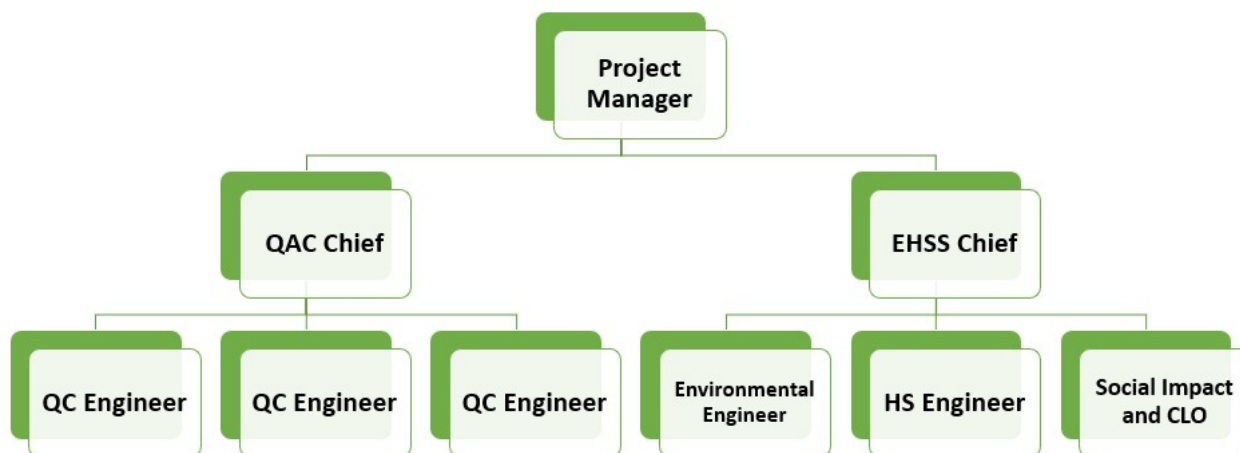


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Manage, improve, monitor, and update this Plan. Ensure technical support is provided to contractors for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractor
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Ensure Stakeholder Engagement and GRM are understood by all employees.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.

Roles	Responsibilities
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> • Ensure this plan is implemented according to the Project standards. • Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. • Ensure all relevant topics followed are reported to Kalyon Enerji • Obtain data from sub-contractors regarding activities defined in this Plan. • Organize trainings related to this Plan. • Conduct periodic internal audits. • Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). • Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. • Ensure site activities are implemented according to applicable H&S requirements. • Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. • Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment, and training. • Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. • Organize the trainings related to this procedure for the personnel they are responsible for this Plan. • Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> • Control incoming and outgoing traffic at all times. • Report all security issues to the HSSE Chief • Involve in the investigation team for the investigation of the security incidents. • Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. • Ensure all mitigation measures and management controls are implemented properly. • Ensure that only properly trained and qualified security personnel are employed. • Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions, and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> • Develop its own procedure to fully implement this Plan. • Ensure compliance with Project standards and contractual agreements. • Ensure related non-compliances are recorded and responded to immediately. • Conduct internal audits and record identified incompliances. • Provide related trainings. • Appoint a responsible person for activities defined in this Plan. • Provide staff, equipment, and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.

Roles	Responsibilities
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Support the effective implementation of this plan in the area of competence. Perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence.

4 MANAGEMENT & MITIGATION REQUIREMENTS

Mitigation measures in order to prevent pollution during the Project works are listed below. In addition to these, the mitigation measures provided in relevant management plans such as waste management plan will be implemented in order to prevent pollution. In case there is a spill occurred the procedure described in the Emergency Preparedness and Response Plan (EPRP) will be complied.

4.1 Air Quality Control

The following actions are recommended to reduce the dust generation in the construction areas. Relevant mitigation measures should be rigorously enforced in the vicinity of sensitive receptors (i.e. residential areas, ecologically sensitive areas (if any)).

- Use of water spraying at construction sites and transportation routes, especially in hot-dry seasons and in windy conditions,
- Loads in all trucks transporting dust-generating materials will be sprayed with water to suppress dust (keeping the material moist),
- Use of water suppression for control of loose materials on paved or unpaved road surfaces,
- Completed earthworks will be sealed - as soon as reasonably practicable after completion.
- In case alternative roads are present, construction traffic will avoid passing through the settlements. If unavoidable, necessary measures (i.e., speed limits) will be taken to prevent/minimise transportation related emissions and inform the communities about the activities and schedule.
- Speed reduction for the means travelling inside the construction site.
- Trucks carrying fine material (excavation soil or fine material, etc.) to the site or from the site will be covered with tarpaulin to prevent dust emissions.
- Loading and unloading of material will be carried out without scattering to the extent possible.
- Lighting of fire and burning of materials in will be prohibited.
- Activities will be conducted trying to use the minimum required number of means at the same time,
- Transportation distances will be minimized where possible,
- Vehicle engines and other machinery shall be kept turned on only if necessary, avoiding any unnecessary emission,
- All equipment and machinery must be maintained for compliance with standards and technical regulations for the protection of the environment and have appropriate certification,

- Machinery and equipment shall be periodically checked and maintained to ensure their good working condition.
- Emergency generator working hours will be recorded and necessary emission measurements will be conducted in case of exceeding 500 working hours in a year. Monthly operating hours of the previous year and the records regarding the amount of gas/fuel consumed in emergency situations and the frequency of the emergency (year/day) will be reported to Provincial Directorate of Ministry of Environment, Urbanization and Climate Change (MoEUCC) until January 31 of each year.
- Exhaust gas emission arising from the engine land vehicles in traffic will comply with the Regulation on Control of Exhaust Gas Emissions. Vehicles will be subjected to appropriate routine maintenance programs and emission measurements as required by the regulation. The use of vehicles that do not comply with the emission limits will not be permitted until such vehicles will be serviced and re-tested. Emission measurements of heating centers in the construction camps (if any) will be conducted according to Regulation on Control of Air Pollution from Heating if the thermal power is below 1000 kW and Regulation on Control of Industrial Air Pollution if the thermal power is above 1000 kW.

Monitoring results will be taken into account in the extent of implementation of mitigation measures.

No impact on air quality is expected except for the emissions from the vehicles to be used during the operation period.

4.2 Noise and Vibration Control

The following mitigation measures will be applied to ensure that the impact of noise and vibration under all construction activities is minimized, especially for noise-sensitive receivers such as workers, settlements, and vulnerable ecologies (if any).

- Speed limit applications should be applied throughout site for the Project vehicles that will transport construction materials/equipment.
- Machinery, equipment and vehicles with lower sound power levels and sound reduced models will be preferred.
- Properly refurbished and/or new machinery, equipment and vehicles will be used to the extent possible.
- Maintenance of construction vehicles will be conducted regularly by means of a regular vehicle maintenance and repair program as per the recommendations of the manufacturer.
- Any component of machinery or equipment, which is thought to generate excessive noise (e.g., a defective muffler, broken or loosely placed engine hood) will be discarded if said components cannot be maintained/repared and they will be replaced as appropriate.
- Engine covers will be kept closed when the equipment is in operation to minimize noise.
- Workers will be trained in noise abatement best practices, including avoiding unnecessary revving of engines and switching off equipment when it is not required.
- Idling of construction vehicles will be avoided.
- Night-time activities will be avoided where possible.
- Best management practices (e.g., selection of equipment and work methods) will be used to limit vibration impacts, particularly nuisance vibration. Heightened attention to vibration control will occur when working within 50 meters of residences and other sensitive receptors with high vibration creating equipment. Significant changes to the vibration levels can occur based on the soil conditions and the

driving energy of the hammer¹

Monitoring results will be taken into account in the extent of implementation of mitigation measures.

No noise impact is expected except for the low-level noise emissions from inverters which are generally reduced by a combination of shielding, noise cancellation, filtering, and noise suppression.

4.3 Protection of Soil, Surface Water and Groundwater

The necessary measures for the safe storage, supply and transport of all fuels, wastewater, oil, and chemicals at the site will be implemented to prevent pollution of the soil, surface water and groundwater. These measures will particularly include the following conditions:

- Fuel, oil, and other chemicals will be stored over impermeable floors inside an impermeable spill control reservoir. The flood control reservoir will have the capacity to contain 110% of the volume of the largest tank.
- If minimal quantities fuels, oil and other chemicals cannot be stored in a central storage area or with a spill control reservoir, they will be stored in a manner to prevent risk to the soil. As a minimum, drip trays will be used; however, additional measures will be taken depending on the nature of the substance or on the sensitivity of the receiving environment.
- All vehicles, equipment and installations will be checked for any fuel or oil leakage before they are accepted for use; and then maintained regularly to minimize the risk of pollution.
- Fuel storage and transport will not be performed over ground that has shallow ground water or unconfined aquifer conditions.
- Fuelling and re-fuelling activities will be strictly controlled. Such activities and storage tanks will be distanced from environmentally sensitive receivers. It is particularly important that:
 - Fuelling of the fixed and movable equipment and vehicles is conducted in areas which are at least 30 m away from drains, waterways, and wetlands and with preferentially over impermeable surfaces. An adequate number of appropriate absorbents are in place at the fuelling stations to cope with minor leak. Spill / leakage kits (absorbent material) will be available in all vehicles. Employees will be provided with practical training regarding their use.
 - Drip trays will be used during fuelling even if above impermeable ground.
 - Vehicles are never left unattended in case of a jammed valve during fuelling.
- Taps and valves are checked regularly for signs of wear; and that they are securely closed and locked when they are not in use. Drip trays will be placed to collect the leaks which originate from equipment such as generators and pumps. Drip trays will be maintained and always kept clear rainwater.
- Impervious (concrete etc.) surfaces will be designated for the refueling and maintenance of the machinery/vehicles. If it is not possible according to the nature of the Project, all refueling tankers and all heavy machinery used at the site will have drip trays, and these trays will be placed under the pipe connection points to prevent accidental leakage to the soil during refueling operations.
- Hazardous materials including petroleum products will only be stored in areas designed to ensure non-

¹ Minimum distance value has been determined according to "Guideline for the Management of Noise and Vibration: Construction and Maintenance Activities- Appendix B Typical Vibration Levels from Construction Activities-Pile Drivers" published by Government of South Australia Department of Infrastructure and Transport (2021). Significant changes to the vibration levels can occur based on the soil conditions and the driving energy of the hammer

compatible materials/wastes are segregated and located in designated areas to optimize control. Specifications of the storage areas are given in the Hazardous Material Management Plan.

- The temporary waste storage areas will be constructed based on the requirements listed in the Regulation on Waste Management issued on April 02, 2015, Official Gazette no: 29314 and GIIP. Specifications of the temporary waste storage areas are given in the Waste Management Plan.
- Generators will be equipped with drip trays and to be checked regularly to prevent soil contamination.
- Secondary containments, ponds and drip trays will be checked regularly, especially during extreme weather conditions.
- Maintenance/repair works will be conducted regularly for vehicles/construction equipment to prevent oil leaks.
- Diesel delivery and lubrication of vehicles will be made over impermeable ground or drip trays.
- Vehicles will be regularly maintained, and oil leaks will be prevented.
- Spill kits will be placed in each vehicle and at various locations around the site (such as near the waste storage area, the chemical storage area).
- Spill / leakage kits (absorbent material) will be available in all vehicles. Employees will be provided with practical training regarding their use.
- When possible, muddy tires will be washed before travelling over asphalt roads. Inert materials (sand, soil, and gravel) spilled over asphalt roads will be swept and cleaned to prevent accidents.
- If needed, vehicles will be washed in specially determined areas which have an oil trap at the end of the drain system. Each vehicle washing facility will be constructed safely using a circulation system that prevents overflow; and liquid wastes will be collected for proper treatment and disposal. Necessary environmental permits will be taken in case of discharge of the resulting wastewater to receiving bodies.
- To avoid pollution due to grease/oil/fuel leaks, direct access of vehicles and mechanical equipment to waterways will be kept at minimum, and any vehicle/equipment will be checked before it enters/passes through a waterway.
- Movable equipment will be subject to regular maintenance as recommended by the manufacturer; and all personnel will be trained on the use of cleaning equipment (e.g., spill kits) and will carry absorbents in their vehicles.
- Training on spill response, use of containment and clean-up material (spill kits) will be provided to works (including the subcontractor workers).
- Pumps and transmixers will be washed only at the concrete plants, concrete slurry will not be discharged into environment.
- Septic tanks will have a leakproof report, and necessary measures will be taken to prevent them from deforming in extreme weather conditions.
- Storage tanks and tankers will be used only for their intended purposes,
- Wastewater will be collected into septic tanks having 30 m³ capacity and collected wastewater will be transported to Gaziantep Municipality Wastewater treatment plant via sewage trucks.
- If surface water or groundwater will be used, permission will be acquired from the Regional Directorate of State Hydraulic Works as per to the Law on State Hydraulic Works General Directorate Organization

and Duties numbered 6200, notwithstanding that water amount. Permission applications will be made specifying the amount of water to be consumed and the method of water intake. Water usage criteria stated in the permit will be obeyed.

- In case of changes in the main sources of water supply studied in the ESIA, the study of water sustainability should be repeated.
- Worksite will be minimized to the smallest extent possible in order to meet Project's works and activities.
- The foundations' footprints and depths have been properly dimensioned; hence the excavations and the consequent physical-mechanical disturbances will be minimized.
- Discharge of untreated wastewater, residues, or other waste into groundwater or into surface water will be avoided.
- Drivers which carry solid, liquid, gas fuel will have approved certificates. Materials which are packaged for transportation will be controlled for holes. If solid materials are spilled on roads, the roads will be swept, and the material will be collected into an appropriate container and brought to the appropriate solid waste storage area. Specifications of the hazardous material transportation are given in the Traffic Management Plan and Hazardous Material Management Plan.
- All materials and equipment will be kept clean and tidy at the worksites, workshops and warehouses and will not be disorganized.
- Inert or other waste types will be classified according to their types and will be carried to the storage area daily.
- Area cleaning will be made periodically at the worksite. Burying or burning of wastes is certainly prohibited.
- The construction site will be cleaned at the end of work and will be left in as close to its original condition, or if possible, better.

5 TRAINING & AWARENESS

All employees will be provided with general induction training for waste management before starting work in the site. All employees including employees of EPC and its sub-contractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji.

If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method*	Responsibility	Frequency
PPP-1	Air Quality	Monitor air pollutants (PM10) at the sensitive receptors)	EPC and its sub-contractor	Quarterly during construction
PPP-2	Noise	Monitor noise levels at the sensitive receptors for 48 hours	EPC and its sub-contractor	Quarterly during construction
PPP-3	Vibration	Monitor vibration levels at the receptor in case of grievance	EPC and its sub-contractor	In case of grievance
PPP-4	Drinking water	Monitor drinking water quality at the point of use (in taps at the camp site/administrative building) according to applicable parameters defined in the Regulation on Waters Intended for Human Consumption, Chemical Parameters, and Indicator Parameters – Turkish Ministry of Health, 2005 and WHO Drinking Water Guidelines	Kalyon Enerji/ EPC and its sub-contractor	Quarterly during construction and operation
PPP-5	Soil	In case of a spill, analyze soil sample after the area is cleaned up		In case of a spill
PPP-6	Site Inspection	Conduct Site inspection (wastewater drainage networks, waste and hazardous material storage areas, spill response equipment, waste management practices, drip trays etc.)	EPC and its sub-contractor	Daily
PPP-7	Maintenance Records	Monitor maintenance requirements of the vehicles and equipment	EPC and its sub-contractor	Monthly
PPP-8	Records	Records of soil and water contamination remaining after construction	Kalyon Enerji/ EPC and its sub-contractor	Monthly

* Limit values for each parameter are given in ESIA Appendix-B

All monitoring results will be compared with baseline measurements conducted in the scope of ESIA studies. Measurements will be conducted by laboratories which are authorized by the Ministry of Environment, Urbanization and Climate Change. Additional monitoring will be conducted in case of grievances.

Baseline air, noise and groundwater measurement locations are presented in the following figures.

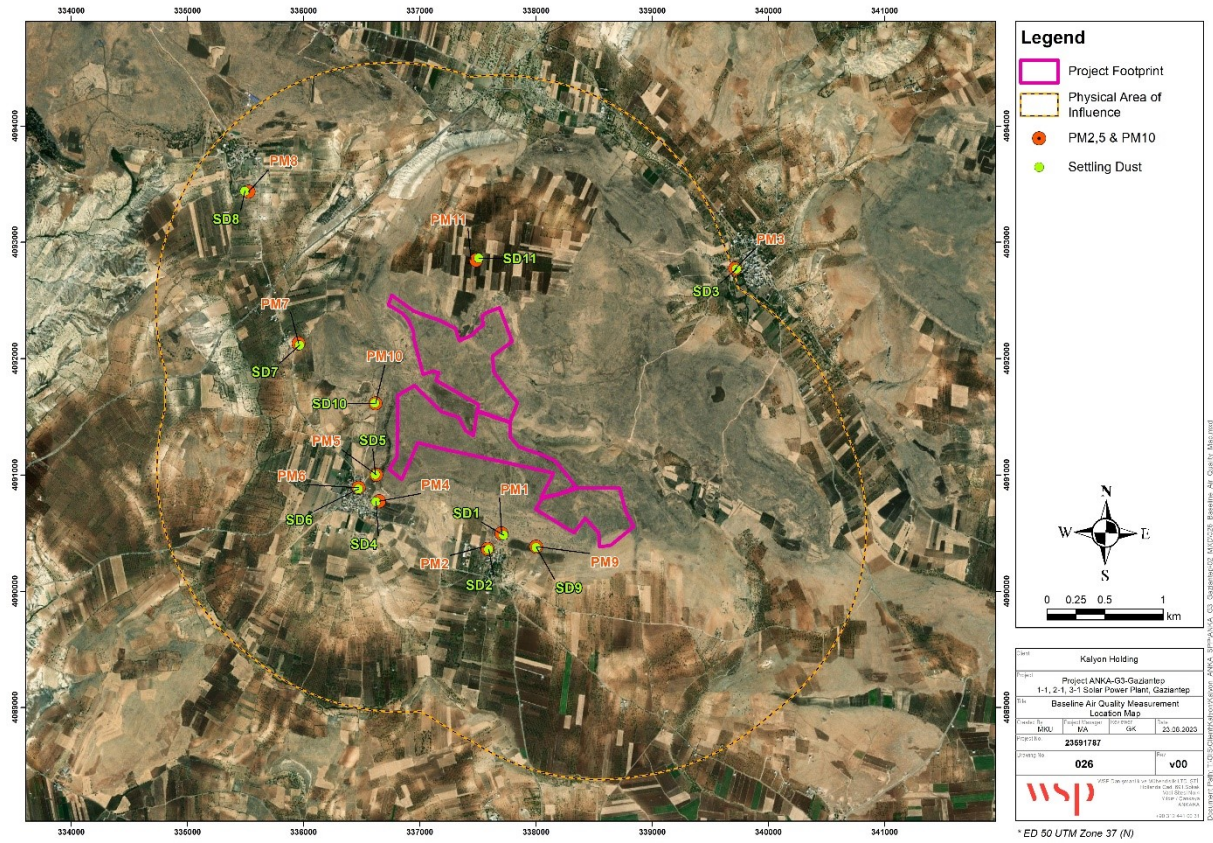


Figure 3 Baseline air quality measurement locations

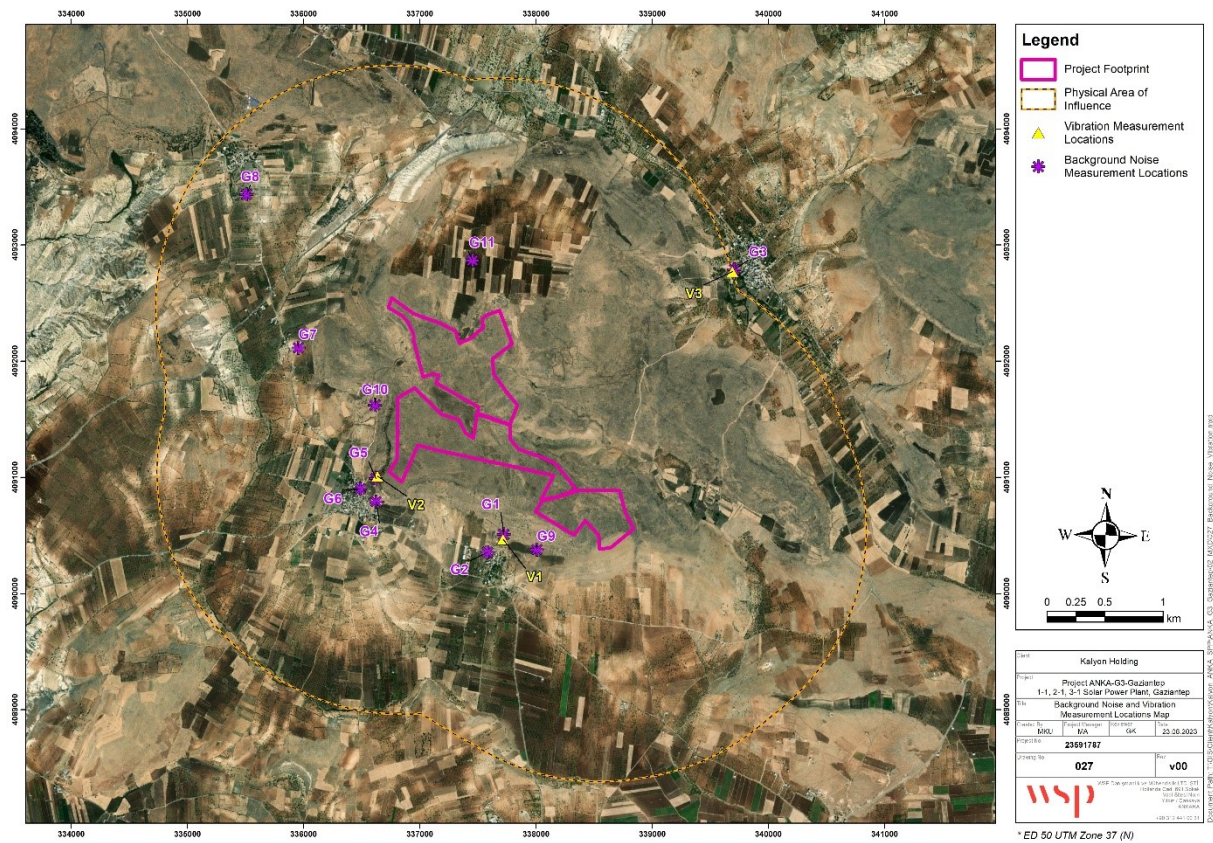


Figure 4 Background noise measurement locations

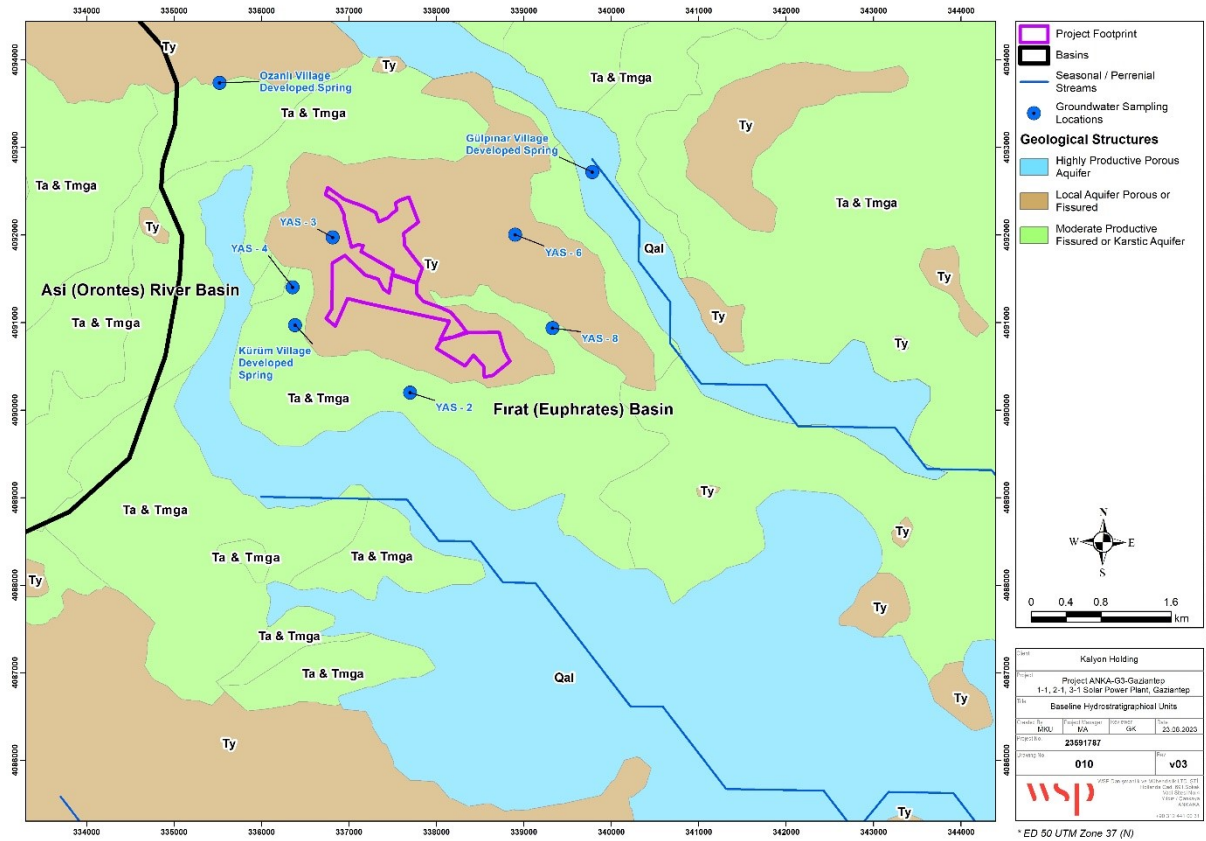


Figure 5 Baseline groundwater measurement locations

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the pollution prevention practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Frequency	Responsibility	Target
PPP-KPI-1	% of compliance of air quality, noise, vibration, soil quality, effluent wastewater, potable water measurements with the Project Standards	Monthly	Kalyon Enerji/ EPC/ Subcontractors	100%
PPP-KPI-2	Environmental Inspections completed vs. planned	Monthly	Kalyon Enerji/ EPC/ Subcontractors	100%
PPP-KPI-3	Environmental trainings completed vs. planned	Monthly	Kalyon Enerji/ EPC/ Subcontractors	100%
PPP-KPI-4	Total % of non-conformities closed within the agreed timeframe; Soil Management Groundwater Flora, Fauna, and Habitats Air Quality Noise and Vibration	Monthly	Kalyon Enerji/EPC/ Subcontractors	70%

ID	Key Performance Indicator	Frequency	Responsibility	Target
	Waste Management			
PPP-KPI-5	Total % of complaints closed regarding to each of the following environmental activities: Soil Management Groundwater Flora, Fauna, and Habitats Air Quality Noise and Vibration Waste Management	Monthly	Kalyon Enerji/ EPC/ Subcontractors	70%
PPP-KPI-6	Statistical trend of oil/chemical spills to soil	Monthly	EPC/ Sub-contractor	Minimise and provide continuous improvement

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-ENV-PLN-0002

Resource Efficiency Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Resource Efficiency Management Plan (REMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This REMP sets out the requirements to define the management system to be implemented to identify measures and corporate targets to reduce resource consumption, to avoid or, when avoidance is not possible, minimize and control negative impacts on the environment resulting from environment and greenhouse gases and the conservation of air, water and soil resources from adverse environmental impacts that generated from Project activities.

The plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months prior to operation and updated at least one (1) year prior to decommissioning.

The requirements set out in this REMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EP) and Organization for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This REMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractor will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies during construction, operational and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC Performance Standards, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The purpose of this Plan is to;

- define the scope and applicable interphases for the management of resources during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,

- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Aoi	Area of Influence
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principle Financial Institution
EPs	Equator Principles
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GHG	Greenhouse Gas
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HFC	Hydrofluorocarbon
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PFC	Perfluorochemical
PPE	Personal Protective Equipment
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
REMP	Resource Efficiency Management Plan
SF6	Sulfur Hexafluoride
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- Equator Principles (EPs) IV,
- IFC Performance Standards (PSs) and EHS Guidelines,
- Organisation for Economic Co-operation and Development (OECD)'s Common Approaches,
- Other good international industry practices (GIIP), and
- International Conventions and Protocols Türkiye is a party to
- Kalyon Enerji's policies, related practices, and procedures

2.1 National Requirements

- Regulation on Zero Waste
- Regulation on Decreasing the Ozone Depleting Materials
- Regulation on Reduction of Sulphur Content of Some Fuel Types
- Regulation on Control of Industrial Air Pollution
- Regulation on Air Pollution Caused by Heating
- Regulation on Control of Exhaust Gas Emission
- Law on Groundwater, No. 167
- Regulation on Water Pollution Control
- Regulation on Control of Pollution Caused by Hazardous Substances in Water and its Environment
- Energy Efficiency Law No. 5627
- Regulation on the Improvement of the Energy Sources and the Efficiency in the Energy Usage
- Regulation on Control of Environmental Noise
- Regulation on Waste Management
- Regulation on Control of Packaging Wastes
- Regulation on Monitoring of Greenhouse Gases Emissions
- Communiqué on Monitoring and Reporting of Greenhouse Gas Emissions

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 3 Resource Efficiency and Pollution Prevention recognizes that increased economic activity and urbanization often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels. There is also a growing global consensus that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the public health and welfare of current and future generations. At the same time, more efficient and effective resource use and pollution prevention and GHG emission avoidance and mitigation technologies and practices have become more accessible and achievable in virtually all parts of the world. These are often implemented through continuous improvement methodologies similar to those used to enhance quality or productivity, which are generally well known to most industrial, agricultural, and service sector companies.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have resource efficiency implications, including:

- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)

- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

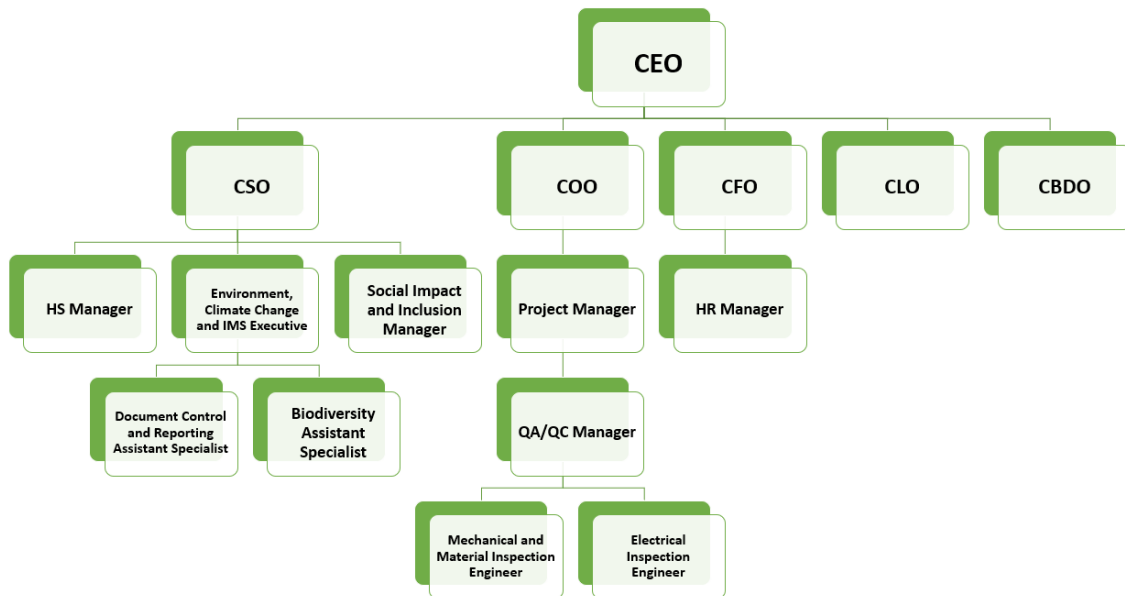


Figure 1: Organization Structure of the Kalyon Enerji

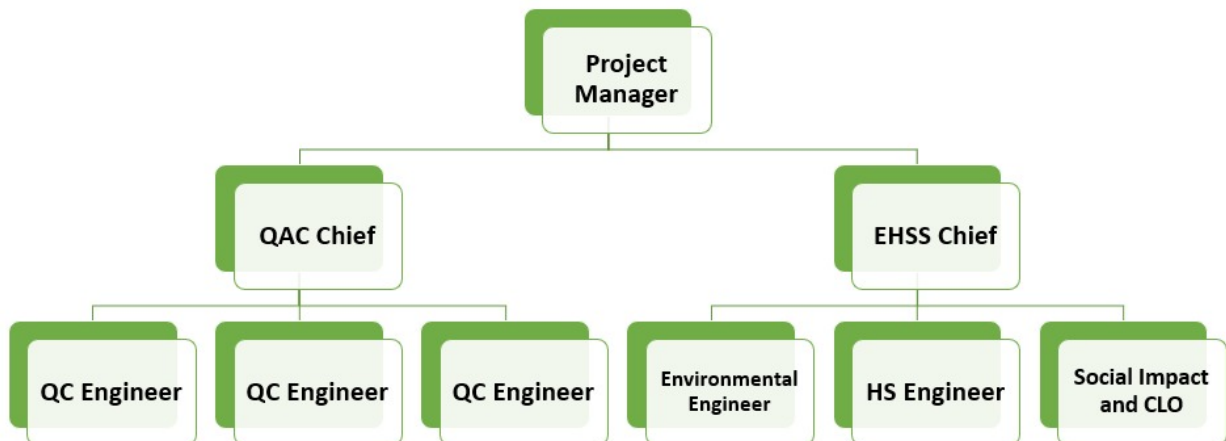


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractor
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. Ensure site activities are implemented according to applicable H&S requirements.

Roles	Responsibilities
	<ul style="list-style-type: none"> Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<p><i>EPC</i> <i>Personnel Affairs Chief</i></p>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment, and training. Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this Plan for the personnel they are responsible for. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<p><i>Security</i></p>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the HSSE Chief Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions, and safety considerations.
<p><i>Sub- contractors</i></p>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<p><i>All Employees</i></p>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.
<p><i>Camp Manager</i></p>	<ul style="list-style-type: none"> Support to effective implementation of this plan at the camp site. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to -EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence.

4 MANAGEMENT & MITIGATION REQUIREMENTS

The general mitigation measures outlined in the following sections will have to be applied to mitigate negative impacts generated by the Project on the environment and to ensure compliance with Turkish regulations and

international standards. This Plan should be read in conjunction with Traffic Management Plan, Pollution Prevention Plan and Waste Management Plan to understand all activities performed by Kalyon Enerji.

Kalyon Enerji will coordinate all the activities and apply the following specific management methods. Following issues are included to This Plan:

- Preparation of a list consisting of types of resources to be monitored and managed. The general categories of resources are presented below:
 - Water (for sanitary use, washing etc.)
 - Fuels (diesel, gasoline)
 - Electricity (directly supplied by external sources/network, back-up power generators) for air conditioning, heating, lighting etc.
 - Heating (directly supplied by external sources)
- Designation of the personnel to monitor the resources consumptions;
- Monitoring measures to verify actual resource use efficiency and mitigation measures to minimize their use and improve efficiency of their consumption;
- Deciding on and taking response actions in case of excessive and/or uncontrolled consumption of natural resources.

As a main scope of this Plan, Kalyon Enerji, EPC, and its sub-construction will regularly monitor the below items:

- Energy/Electricity consumption trends and identify where action can be taken to reduce energy use (e.g. reduce loads of the energy systems, reduce losses in energy distribution, improve energy conversion efficiency);
- Water consumption trends and identify where action can be taken to reduce water use (e.g. reduce losses in water distribution, PV panel cleaning method);
- Material consumption and identify where action can be taken to reduce material use (e.g. reduce chemicals use, if available);
- Fuel consumption and assess what action can be taken to reduce said consumption.

Work Instructions

Written standard work instructions will be prepared to improve the resource efficiency such as:

- Checking conditions of vehicles, tools and equipment;
- Periodic maintenance of vehicles and equipment;
- Turning off backup power generators when possible;
- Shutting down of electronic goods when not used.

Air Emission and Diesel Consumption Control Measures

The general engineering approach will be adopted in all Project activities to control exhaust gas emissions and diesel consumption. This approach will include but not limited to followings:

- Engines will not be left in operating mode when they are not in use;
- Exhaust systems off all vehicles will comply with the exhaust emission limits identified in the relevant

legislation according to the vehicle type and the procedures;

- Maintenance of vehicles will be carried out as recommended by the manufacturer;
- Vehicles will receive the necessary maintenance to ensure the noise and exhaust emissions that such vehicles generate will not create discomfort on workers or local people;
- Measures to control vehicle activities.

Wastes

Where waste generation cannot be avoided, Project will reduce the generation of waste, and recover and reuse waste in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, it will be treated, or disposed of it in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material. If the generated waste is considered hazardous, GIIP alternatives will be adopted for its environmentally sound disposal while adhering to the limitations applicable to its transboundary movement. When hazardous waste disposal is conducted by third parties, contractors will be selected that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies and obtain chain of custody documentation to the final destination.

Broken or damaged PV panels will be sent to the production factory for recycling.

GHG Management

The use of high Global Potential Warming chemicals, such as HFCs, PFCs and SF6 will be avoided as much as possible to reduce GHGs emissions. If no options are available and their use is necessary, they will be used in closed circuits and a documented control system will be in place to verify absence of leakages.

Energy Efficiency Design and Control Measures

Project will use energy efficient equipment (e.g., electric goods, backup power generators, lights etc.) as much as possible. The equipment purchasing process will consider the energy consumption features of the equipment.

Well insulated walls, roofs and floor units in office buildings will be used with double glazing and efficient lighting whenever possible.

Generators: Generators should not be operated at less than 30% load (preferably used at more than 40% load, maximum efficiency is usually achieved above 70% load).

Compressor: The compressors used will be equivalent to the power draw of the equipment it is paired with, and the use of high-efficiency motors and high-efficiency motors, regular cleaning of the inlet filters will be ensured.

When air conditioning systems are used, energy efficiency techniques will be considered as much as possible according to the following criteria:

- Placing air intakes and air-conditioning units in cool, shaded locations;
- Improving building insulation including seals, vents windows, and doors;

PV Panels: Soiling of PV modules will be monitored through devices to calculate the power loss due to light transmission loss.

Water Use Efficiency Design and Control Measures

Project will reduce, as much as possible, water use for cleaning. The water distribution system at camps and buildings (e.g., taps, toilet flushing) will be periodically checked to ensure that they are working properly and that taps are not left open.

Soiling of PV modules will be monitored through devices to optimize the time for cleaning which will reduce the water consumption.

Traffic Control and Management

Transportation hours, roads and parking areas will be designed in accordance with the best usage of time and sources. Periodic maintenance and repairs will be implemented for vehicles. The following mitigation measures will be taken for preventing pollution caused by traffic:

- All drivers will follow the speed limits rules and traffic signs;
- Carpool will be used when applicable;

Cleaning Working Areas

- All office furniture and ground will be kept clean and tidy and organized;
- All waste types will be classified according to their types;
- Cleaning will be made periodically at working areas.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
REMP-1	Resource consumption	Periodically recording the following resources consumption during the operation, construction periods and decommissioning) Water consumption and analysis (for construction/operation and domestic purposes) b) Fuels (for heating, vehicle refuelling, power generation)	EPC and its sub-contractor	Continuous

ID	Topic	Method	Responsibility	Frequency
		c) Electricity (only if supplied by external sources/network using counters) d) Heating (natural gas)		
REMP-2	Air Emission and Diesel Consumption Control Measures	Monitor maintenance requirements and exhaust emissions of the vehicles and equipment	EPC and its sub-contractor	Monthly
REMP-3	Site Inspection	Conduct Site inspection (work instructions in place, operation of engines, generators, compressors, speed rules, carpool usage, cleaning)	Kalyon Enerji/ EPC and its sub-contractor	Continuous
REMP-4	Waste Minimization	Record waste generation amounts according to waste types	EPC and its sub-contractor	Monthly
REMP-5	GHG Estimation	Estimate GHG emissions. If the threshold of 25,000 tonne/year of CO ₂ e emissions is exceeded, quantify GHG emissions to air, based on the yearly collected data of fuel and electricity consumption.	Kalyon Enerji/ EPC and its sub-contractor	Annually

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the resource efficiency practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
REMP-KPI-1	Reduction in resource consumption (water, electricity, fuel, natural gas) as % change in use relative to the previous year*	Kalyon Enerji/ EPC/Sub-contractors	Annually	5%
REMP-KPI-2	Trainings completed vs. planned	Kalyon Enerji/ EPC/Sub-contractors	Monthly	100%
REMP-KPI-3	Total % of resources efficiency related non-conformities closed within the agreed timeframe	Kalyon Enerji/ EPC/Sub-contractors	Monthly	100%
REMP-KPI-4	Total % of resources efficiency related grievances closed within the agreed timeframe	Kalyon Enerji/ EPC/Sub-contractors	Monthly	100%
REMP-KPI-5	Reduction in waste generation % change in use relative to the previous year*	Kalyon Enerji/ EPC/Sub-contractors	Annually	5%
REMP-KPI-6	Site inspections completed vs. planned	Kalyon Enerji/ EPC/Sub-contractors	Monthly	100%

*This KPI cannot be applied since the construction period will be completed in less than one year. Resources consumption and waste generation will be monitored in the first year, and KPI will be evaluated in the following years during the operation period.

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-SOC-PLN-0003

Security Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Security Management Plan (SECMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This SECMP sets out the requirements for the management of environmental and social impacts, particularly concerning security management during the implementation of the Project.

The Plan applies to the construction, operation and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year before decommissioning.

The requirements set out in this SECMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This SECMP applies to all Project activities under the Client's supervision, its contractors and all employees. The Client is the main responsible for the implementation of this Plan. Contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed under Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is;

- To define the scope and applicable interphases for the management of security during all project activities,
- To define project standards in terms of components,
- To define responsibilities, commitments, operating procedures and instructions for the implementation of this Management Plan,
- To manage components and monitor Project performance,
- To define training requirements, monitoring measures and Key Performance Indicators.

1.3. Abbreviations

Abbreviation	Definition
CCTV	Closed-Circuit Television
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
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2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices and procedures.

2.1 National Requirements

- Law on Labor (No. 4857)
- Law on Occupational Health and Safety (No. 6331)
- Law on Private Security Services (No. 5188)
- Law on Public Health (No.1593)
- Regulation on Protection Against Sabotage

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 4 Community Health, Safety, and Security recognize that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this PS addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related-activities, with particular attention to vulnerable groups.

IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts has been developed for IFC clients and other private sector companies and their consultants. The handbook provides practical, project-level guidance for companies to better understand and implement the requirements outlined in Performance Standard 4. The document focuses on risk assessment, managing private security, managing the relationship with public security, preparing a security management plan, and assessing allegations or incidents related to security personnel.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have security management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

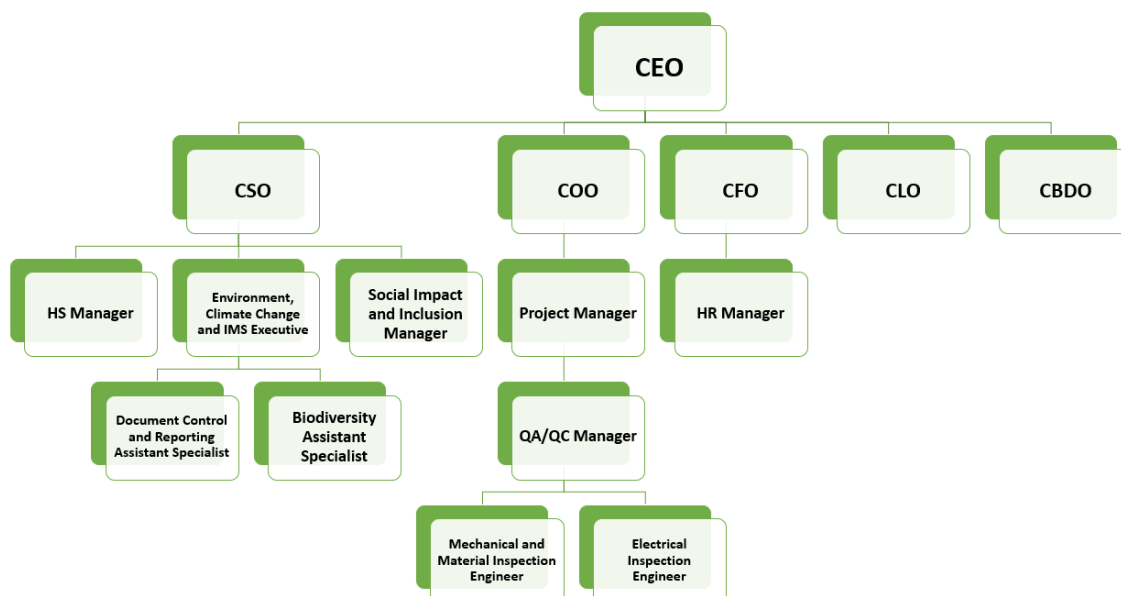


Figure 1: Organization Structure of the Kalyon Enerji

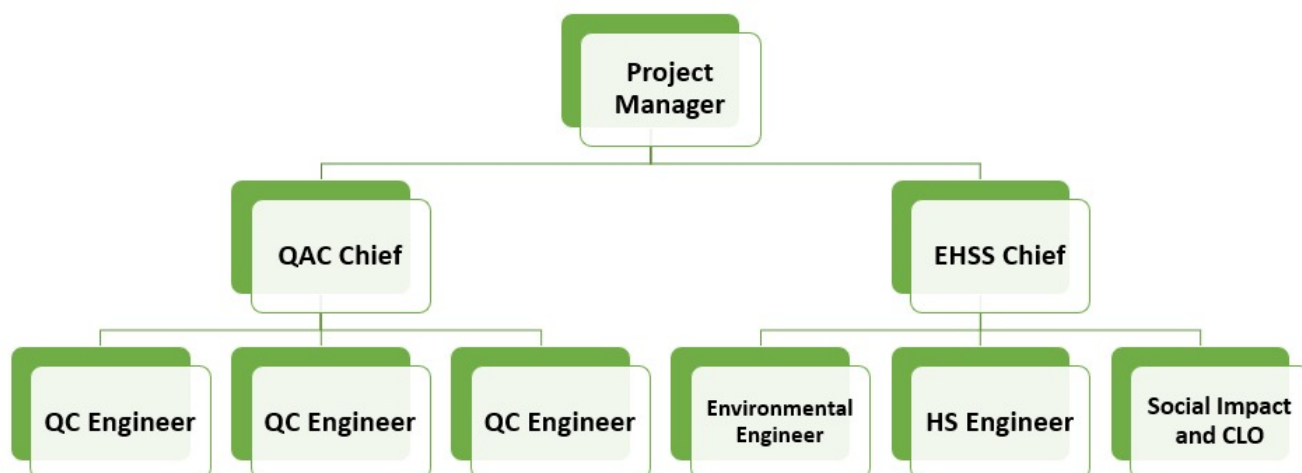


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organisational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this Plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji. Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in

Roles	Responsibilities
	collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Support effective implementation of this Plan. Support internal grievance redress mechanism in collaboration with social impact and stakeholder engagement specialist. Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment and training. Report to government and other bodies on compliance with commitments and other occasions as required by legislation. Organize the training related to this Plan for the personnel they are responsible for. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits.
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the <i>EPC EHSS Department</i>. Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related training. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the training. Ensure compliance with measures defined in this Plan.

4 MANAGEMENT & MITIGATION REQUIREMENTS

General security measures that are provided below will be implemented throughout the Project's lifetime.

4.1 Security Risk Assessment

A security risk assessment will be conducted to define risks regarding employees, contractors, subcontractors, suppliers, visitors and community members, and to determine potential vulnerabilities and threats to operations, assets, equipment and campsites. During this assessment, the following will be considered:

- National regulations and international standards,
- Existing security arrangements,

- Present local socio-political situations,
- The surroundings and ongoing activities around the Project Area,
- Past and present experiences regarding similar projects and operations.

4.2 Security Organization

Based on the security risk assessment, a security organization will be established by contracting a private security company. In selecting a security contractor, the Project will perform proper due diligence that will include screening for institutional reputation, training standards, procedures for screening employees, and any history of allegations of human rights abuses or other criminal behaviour. The following measures will be taken during the establishment of the security organization:

- A Security Chief will be assigned to periodically control the security requirements, arrangements, potential threats and the conformity of the existing control measures.
- Security services will be provided continuously (24 hours x 7 days a week).
- Security personnel will not have criminal records.
- Security personnel will not be armed.
- Security personnel will complete necessary psychological tests and evaluations before employment.
- Security personnel will be trained according to their roles and training records will be reviewed by the Security Chief.

4.3 Access to the Project Area and Permission

The following measures will be taken during the access to the Project area and workplaces:

- Security checkpoint(s) will be established at the campsites. A security service provider will be contracted for the security of the camps, and entrance and exits to campsites will be under the control of the same security company.
- Camp sites' boundaries will be enclosed with wired fences to prevent any unauthorized entry.
- Considering the size of the Project area, security cameras will be installed around the Project area.
- All personnel entering the Project area will carry an ID badge.
- For suppliers and visitors, before providing access to the Project area, official identity cards will be required by security personnel for the registration process and approval of access will also be taken from the related personnel/department.
- All vehicle access to the Project area will be subjected to a vehicle registration procedure.
- Entrance and exit of the equipment/material to the Project area will be controlled at the security checkpoints, the movement of equipment/material will be allowed after the approval of the relevant personnel/department.
- Security personnel will collaborate with Procurement and EHSS departments to ensure that all hazardous materials are checked in upon receipt and that quantities and material descriptions match associated shipping manifests.
- Security personnel will be tasked with providing transporters with specific directions on the final delivery location internal to the Project area.

- Security personnel will alert the EHSS department, which will monitor the off-loading or staging of the delivered materials.

4.4 Visitors

In addition to the above-given measures, the following measures will also be applied to visitors:

- Visitors entering the Project area, will be registered to the visitor register book at the checkpoint(s).
- All visitors will receive general OHS training before entering the Project area to recognize specific workplace hazards or potential hazards. For short-term visits of a few hours to the work area and/or in cases where people will not be directly exposed to workplace activities, a visitor orientation/promotion form will be given and signed. Long-term visitors who will stay on the site will attend full training and related training records will be kept.
- After the necessary orientation and PPE procurement, visitors will be accompanied by trained employee/security personnel at the Project area.
- Taking photographs or recording videos within the Project area will only be allowed if written permission is obtained from the EHSS Chief and/or HR Specialist.

4.5 Communication and Continuous Monitoring

- Patrols will be done at regular intervals and in cases of possible security breaches.
- CCTV will be continuously operational (24 hours x 7 days a week) and the records will be reviewed on a sampling basis at regular intervals. Any threatening issue will be reported to the Security Chief immediately.
- In case of an emergency, Security Chief will contact the relevant authorities and law enforcement officers.

4.6 Alcoholic Beverages, Drugs, Guns, and Explosives

- Any person under the influence of alcohol or illegal drugs, and any person possessing guns, or any explosives will not be permitted to enter the Project area. The security personnel have the right to offer alcohol and drug test to any suspicious person.

4.7 Security Incidents Including Human Rights Abuse

- The client will record and investigate all security incidents and all allegations of abusive and unlawful acts of security personnel. These acts will also be reported to public authorities. The client will take action to prevent any recurrence of the incidents where appropriate.
- The client will ensure that information used as the basis for allegations of human rights abuses is credible and based on reliable evidence. Additional or more accurate information that could replace previous allegations should be provided to interested parties as appropriate.¹
- Security personnel will be trained in communication with local people, crowd management, conflict management and problem-solving, the cautious performance of security operations and appropriate force use and human rights.
- Security personnel will have training in conflict resolution and cultural sensitivity. This training should also include gender considerations as women often have different experiences and interactions with

¹ <https://www.voluntaryprinciples.org/the-principles/>

security personnel.

- The use of force by security personnel is only sanctioned when it is for preventive and defensive purposes in proportion to the nature and extent of the threat.

4.8 Community Engagement

- A grievance mechanism will also be used for communities to state their concerns and complaints about the security personnel. Nearby community members will be provided information about how to raise their concerns through a grievance mechanism.

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

Special training and necessary advanced training are to be provided to the security personnel (including human rights and the use of force), drivers and key personnel involved in activities that are conducted off-site, e.g., along the transport route.

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
SMP-1	Employment	Checking the criminal records of the security personnel	EPC and its sub-contractor	Prior to the employment Annually
SMP-2	Training	Ensuring that related training is provided to security personnel	EPC and its sub-contractor	Prior to the employment Annually
SMP-3	Access and Exit	Monitoring accesses and exits to the Project area, and checking	EPC and its sub-contractor	Continuously

ID	Topic	Method	Responsibility	Frequency
		Closed-Circuit Television (CCTV) records		
SMP-4	Security Incident	Statistical trend of security incidents involving personnel, contractors, subcontractors, suppliers, visitors, and local community members	EPC and its sub-contractor	Monthly
SMP-5	Grievance	Statistical trend of grievances regarding security personnel and security management controls	EPC and its sub-contractor	Monthly
SMP-6	Records	Recording/investigation security related incidents and grievances involving personnel, contractors, subcontractors, suppliers, visitors, and local community members	EPC and its sub-contractor	Continuously

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the security management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
SMP-KPI-1	Number of security incidents involving personnel, contractors, subcontractors, suppliers, visitors and local community members (Total Recordable Incident Rate (TRIR), Lost Time Incident Rate (LTIR), Incident Frequency Ratio (IFR), Incident Severity Ratio (ISR))	EPC and its sub-contractor	Monthly	Minimize and target zero
SMP-KPI-2	Inspections completed vs. planned	EPC and its sub-contractor	Monthly	100%
SMP-KPI-3	Security-related training completed vs. planned	EPC and its sub-contractor	Monthly	100%
SMP-KPI-4	Total % of security-related non-conformities closed within the agreed timeframe	EPC and its sub-contractor	Monthly	100%
SMP-KPI-5	Total % of security-related grievances closed within the agreed timeframe	EPC and its sub-contractor	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



DRAFT REPORT

**Project ANKA - G3-Gaziantep-1-1, 2-1, 3-1 Solar Power
Plant, Gaziantep**
Stakeholder Engagement Plan

Submitted to:

KALYON YEKA GES 3 ve 4 GÜNEŞ ENERJİSİ YATIRIMLARI A.Ş.

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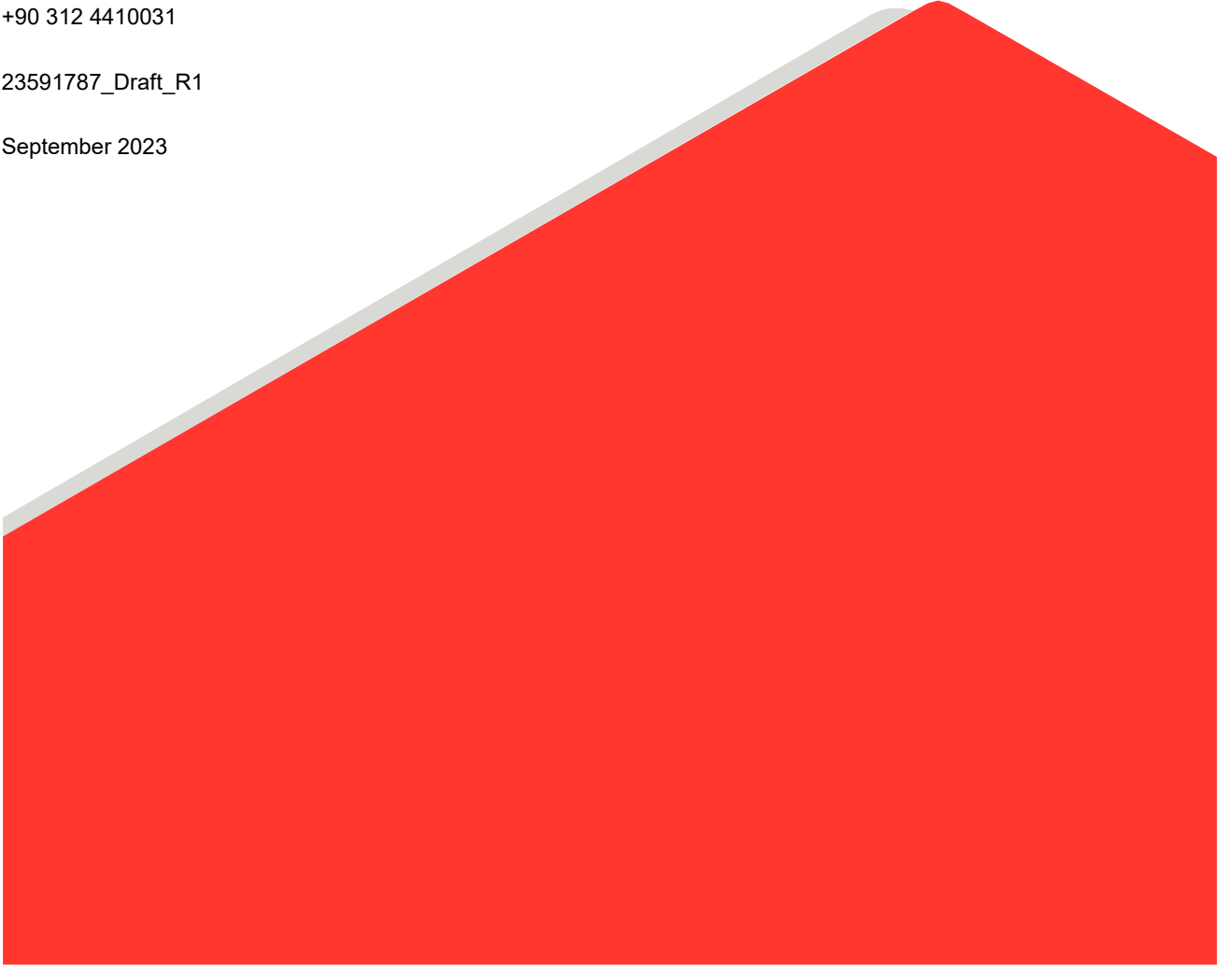
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Consultation Meeting Form

APPENDIX C

Consultation Meeting Register

APPENDIX D

Employee Request and Grievance Register

APPENDIX E

Stakeholder Request and Grievance Form

APPENDIX F

Stakeholder Request and Grievance Register

APPENDIX G

Appeals Committee Application Form

DEFINITIONS¹

Environmental and Social Impact Assessment: The Environmental and Social Impact Assessment (ESIA) process is a way to identify, predict and assess the type and scale of potential E&S impacts, and opportunities to benefit conservation associated with any business activities or projects.

Grievance Mechanism: The IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009) defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Public consultation: As referred in the IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009), public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups and organisations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

Stakeholder Engagement Plan: Stakeholder Engagement Plan (SEP) is a guidance for stakeholder consultations and communications during the period of the main ESIA studies and other aspects of the project analysis and design. SEP is a living document should be updated toward the end of the ESIA studies to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

Vulnerable People: Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

^{1 1} The definitions presented in here are directly quoted from the Performance Standards and the Guidance Notes of IFC.

ABBREVIATIONS

The Project	Gaziantep, G3-Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
'Kalyon Enerji' or 'Project Owner'	Kalyon Enerji Yatırımları A.Ş.
Client	Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EPC	Engineering, Procurement and Construction, UKKA Group Limited
WSP Türkiye	WSP Danışmanlık ve Mühendislik Ltd. Şti.
AESMR	Annual Environmental and Social Monitoring Report
Aol	Area of Influence
CLO	Community Liaison Officer
CLS	Community Level Surveys
CIMER	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
EIA	Environmental Impact Assessment
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
EPC-F	Engineering, Procurement, Construction and Financing
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
HHS	Household Surveys
IFC	International Finance Corporation
KPIs	Key Performance Indicators
LRP	Livelihood Restoration Plan
MENR	Ministry of Energy and Natural Resources
MoTI	Ministry of Transport and Infrastructure
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGOs	Non-governmental Organisations
PAP	Project Affected People

PIU	Project Implementation Unit
PSs	Performance Standards
SEP	Stakeholder Engagement Plan
SPSS	Statistical Package for the Social Science
TMMOB	Union Chambers of Turkish Engineers and Architects
TOBB	Union of Chambers and Commodity Exchanges of Türkiye

1.0 INTRODUCTION

G3-GAZİANTEP-1-1/2-1/3-1 Solar Power Plants Project with a total installed capacity of approximately 65 MWp/50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be in Gaziantep Province, in the Şahinbey District, Kürüm neighbourhood in Türkiye.

The Project Area was announced as a Renewable Energy Resource Area (YEKA) by the Ministry of Energy and Natural Resources. Scope of the "Contest Announcement on the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy" published in the Official Gazette dated 03/07/2020 and numbered 31174; YEKA G3-GAZİANTEP-1-1/2-1/3-1 competitions were won by the Client. YEKA Right of Use Contract were signed on 01.07.2021 between the winner of the competition, Kalyon Enerji Yatırımları A.Ş and the Ministry of Energy and Natural Resources. Pre-license was given by the Ministry of Industry and Technology, numbered ÖN/11080-30/05183 and 28.07.2022.

The Project consists of three sub-projects namely, G3-Gaziantep-1-1 Solar Power Plant Project, G3-Gaziantep 2-1 Solar Power Plant Project and G3-Gaziantep 3-1 Solar Power Plant Project. Individual Environmental Impact Assessment (EIA) reports have been prepared for these sub-projects per the requirements of national EIA Regulation and the "EIA Positive" decisions for each have been acquired as shown in Table 1 and official correspondences regarding EIA decisions are presented in Appendix A of the ESIA report.

Table 1: EIA Decisions of Sub-Projects

Name of Sub Project	Allocated Area (ha)	Capacity	National EIA Status	Land Allocation
G3-Gaziantep 1-1 Solar Power Plant Project	49.98	26 MWp/26 MWm/20 MWe	EIA Positive Decision Acquired (Decision Date/No: 25.12.2022/6884)	Pastureland Treasury land –
G3-Gaziantep 2-1 Solar Power Plant Project	48.12	26 MWp/26 MWm/20 MWe	EIA Positive Decision Acquired (Decision Date/No: 26.12.2022/6885)	Pastureland Treasury land –
G3-Gaziantep 3-1 Solar Power Plant Project	24.86	13 MWp/13 MWm/10 MWe	EIA Positive Decision Acquired (Decision Date/No: 26.12.2022/: 6886)	Pastureland Treasury land –
TOTAL	122.96	65 MWp/65 MWm/50 MWe	-	-

A Gap Analysis Study, previously prepared by WSP Danışmanlık ve Mühendislik Ltd. Şti. ("WSP Türkiye") in April 2023, has identified gaps of the existing national EIA Reports and available documentation obtained from the Client and suggest actions to close these gaps to reach a full bankable ESIA in line with the International Conventions, IFIs Performance Standards (Equator Principles IV (EP), International Finance Corporation (IFC) Performance Standards (PS), Organization for Economic Co-operation and Development (OECD)'s Common Approaches and Guidelines, and the best practices in the industry along with the national legislation).

The Client retained WSP Türkiye to prepare the Environmental and Social Impact Assessment ("ESIA") for the Project in compliance with the national and international requirements detailed above.

The main components of the plant consist of solar panels, panel carrier systems, inverter stations (consist of inverter, transformer, ring main unit and the substation). Associated infrastructure and utilities can be listed as the administrative building, Supervisory Control and Data Acquisition (SCADA) System and the overhead transmission line (OHTL). Once the Solar Power Plant is put into operation, it is planned to produce 50 MWe of electricity annually, and the electricity produced will be connected to two separate 1272 MCM OHTLs namely Polateli ~100 m 154 kV OHTL and Abdülhamit Han ~100 m 154 kV OHTL.

The Project construction activities has been started in July 2023. The construction period of the Project is estimated to be 6 months and the total operation period will be 30 years.

The Project will be established on a pastureland of 122.96 hectares. Preparation and Approval of 1/25000 and 1/5000 Master Development Plan and 1/1000 Implementation Development Plan Approval has been completed and cadastral controls are in progress (see Appendix B).

According to the Official Letter dated 29.06.2022 and numbered E-88108382-754-105533 from Gaziantep Metropolitan Municipality, Gaziantep 2040 1/100.000 scaled Provincial Environmental Plan has been canceled with the judicial decision of Gaziantep (2nd) Administrative Court dated 13.03.2020 and numbered E:2018/3825-K:2020/236. After the judicial decision, it was decided to replan with the decision of the Gaziantep Metropolitan Municipality Council dated 17.07.2020 and numbered 329, and it was unplanned in terms of the Environmental Plan. As per this official letter, Provincial Environmental Planning continues throughout the borders of Gaziantep Metropolitan Municipality.

1.1 Project Background

It is of great importance to create a balanced portfolio in electricity generation by increasing the share of renewable energy resources and resource diversity in total electricity generation. In Turkey, importance is given to creating a balanced portfolio in electricity generation by increasing renewable energy resources and resource diversity. With the Renewable Energy Resource Area (YEKA) model realized in this context, the cost of electricity purchased from renewable energy generation facilities will be reduced while developing domestic production in renewable energy technologies and increasing the capacity of qualified human resources.

The Regulation on Renewable Energy Resource Areas was published in the Official Gazette dated 09/10/2016 and numbered 29852. With this Regulation, a new investment model for the utilization of renewable energy resources was introduced.

YEKAs are determined within the scope of administrative and technical studies conducted by the Ministry of Energy and Resources and announced in the Official Gazette. In this case, those who will participate in YEKA competitions know for which area they will apply. In this case, the candidates participating in the YEKA competitions determine the area they will apply in line with the relevant sections published in the Official Gazette.

In addition to this method, after the contract is signed by the winner of the "Competition for Connection Capacity Allocation for YEKA Purposes", candidate YEKAs (project sites) are proposed to be located in the connection region where the connection right is acquired, and these areas can be announced as YEKA and allocated to the investor if deemed appropriate by the Ministry.²

The Project Area was announced as a Renewable Energy Resource Area (YEKA) by the Ministry of Energy and Natural Resources. Scope of the "Contest Announcement on the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy" published in the Official Gazette dated 03/07/2020 and numbered 31174; YEKA G3-GAZİANTEP-1-1/2-1/3-1 competitions were won by the Client. YEKA Right of Use Contract were signed on 01.07.2021 between the winner of the competition, Kalyon Enerji Yatırımları A.Ş

² <https://enerji.gov.tr/eigm-yenilenebilir-enerji-uretim-faaliyetleri-yeka-modeli>

and the Ministry of Energy and Natural Resources. Pre-license was given by the Ministry of Industry and Technology, numbered ÖN/11080-30/05183 and 28.07.2022.

Mobilisation activities has been started in August 2023.

1.2 Project Description

G3-GAZİANTEP-1-1/2-1/3-1 Solar Power Plants Project with a total installed capacity of approximately 65 MWp/50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be in Gaziantep Province, in the Şahinbey District, Kürüm neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 50 MWe of electricity annually, and the electricity produced will be connected to two separate 1272 MCM OHTLs namely Polateli ~100 m 154 kV OHTL and Abdülhamit Han ~100 m 154 kV OHTL.

The Project pre-construction activities, namely, mobilization of temporary site facilities, site preparation, grading and levelling, material delivery and storage and certain early trenching activities for cable laying is planned to be started in August 2023.

Figure 1 represents the actual site conditions.



Figure 1: Photos of Project Area (Dated May 10, 2023, taken by WSP)

Project layout is presented in Figure 2.



Figure 2: Project Layout

1.3 Project Parties

Project parties that will be involved in the SPP investment are illustrated below.

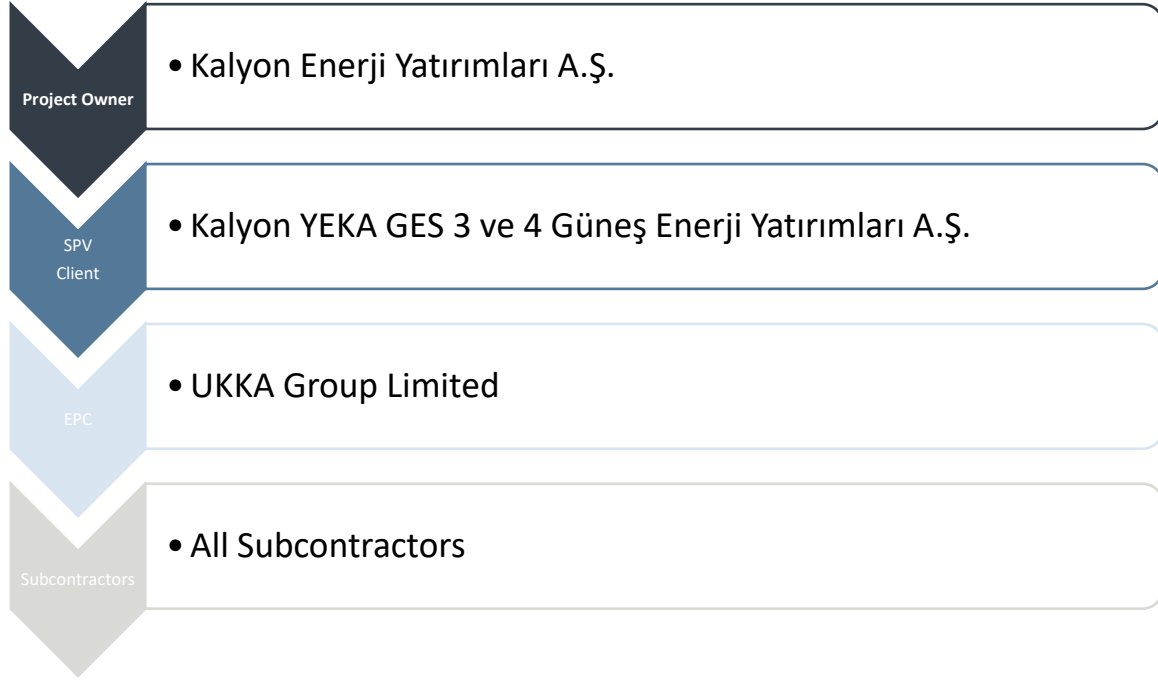


Figure 2: Illustration of Project Parties

Project Owner: Kalyon Enerji Yatırımları A.Ş.

SPV and the Client: Kalyon YEKA GES 3 ve 4 Güneş Enerji Yatırımları A.Ş., special purpose vehicle established for construction and operation of the facility, subsidiary of Kalyon Enerji Yatırımları A.Ş.

EPC: UKKA Group Limited, responsible for engineering, procurement, and construction during the construction phase of the facility.

TEİAŞ: Turkish Electricity Transmission Corporation, a public government company, that operates and owns the transmission of electricity, is responsible for the planning of a transmission investment for the new transmission facilities to be established, to establish new transmission facilities. The right of ownership and operation boundary of TEİAŞ starts at the connection point to the transmission system. In case the connection of the generation or consumption facility to the transmission system is carried out through the switchyard of another generation or consumption facility, the right of use, operation, and maintenance of the connected feeder belongs to TEİAŞ. However, TEİAŞ may request the operation and maintenance of such equipment to be performed by the relevant generation or consumption facility at a specified cost.

Global Enco Energy: contractor responsible for the construction of energy transmission lines for all YEKA Projects under an ordinary partnership that will be established with the participation of YEKA Project Owners including Kalyon Enerji.

Based on the information provided by the Client, the roles and the main responsibilities of the Project parties are summarized in the Figure 2 above.

1.4 Project Timeline

A summary of the Project schedule is presented below. According to the schedule, the construction period of the Project is estimated to be 6 months and the overall operational period is estimated as 30 years.

Table 2: Project Schedule Summary

Activity	Start Date	Finish Date
Permitting		
Ministry Approval of Design	15-Jan-23	17-Feb-23
Construction Permit	19-Aug-23	21-Aug-23
Final Delivery Acceptance Certificate Application & Issuance	07-Oct-23	11-Oct-23
The signing of the YEKA Contract	01-Jul-21	-
Master Plan Approval	14-Apr-22	01-Jul-23
EMRA (EPDK) Pre-License Approval	01-Jul-22	21-Jul-22
Base Plan Approval of the Site	01-Apr-22	25-May-22
Environmental Impact Assessment Approval	01-Mar-22	25-Nov-22
Signing TEİAŞ Connection Agreement	16-Nov-22	19-Apr-23
Transfer of Land Ownership	18-Nov-22	18-Aug-23
Land Allocation Approval	21-Jul-23	20-Sep-23
Electricity Generation License Approval	19-Aug-23	28-Aug-23
Baseline Studies (Physical Measurements & Biodiversity Monitoring)	01-May-23	30-Jun-23
Engineering	06-Sep-22	26-Aug-23
SPP Engineering	28-Sep-22	24-Jun-23
Substation Contracting & Engineering	06-Sep-22	01-Jul-23
OHTL Contracting, Engineering	04-Oct-22	31-Mar-23
CCTV & Lighting Engineering	24-Jul-23	26-Aug-23
Procurement	09-May-23	24-Nov-23
Early Works	24-Jul-23	03-Sep-23
Earthworks on Site Surface	24-Jul-23	15-Aug-23
Reptile & Mammal Burrow Monitoring Prior to Earthworks	24-Jul-23	20-Aug-23
Mobilization Works	05-Aug-23	03-Sep-23
Construction	27-Jul-23	05-Feb-24
Solar System	27-Jul-23	05-Feb-24
Substation	01-Aug-23	08-Dec-23
OHTL	09-Nov-23	08-Dec-23
Test & Commissioning & Provisional Acceptance	11-Sep-23	17-Feb-24
Final Acceptance & Commercial Operation of SPP	-	17-Feb-24
Solar System	11-Sep-23	17-Feb-24

Activity	Start Date	Finish Date
Substation	09-Dec-23	23-Dec-23
OHTL	19-Dec-23	23-Dec-23

2.0 REGULATORY REQUIREMENTS

2.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

2.1.1 The Constitution of the Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

2.1.2 Other main national laws/regulations

I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and

openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

VI. Environmental Law

The Turkish legal framework for environmental protection was developed in line with national and international initiatives and standards, and some of them have been revised recently to be harmonized with the EU Directives in the scope of pre-accession efforts of Türkiye to the EU. In the following sections, related institutions, legislation, processes, and procedures that are related to the environmental and social aspects of the proposed Project are described.

The Ministry of Agriculture and Forestry ("MoAF") is the responsible organization for the issuing and implementation of policies and legislation adopted for the agricultural areas, forestry areas and protected areas.

The Turkish Environment Law No. 2872, which came into force in 1983, deals with environmental issues on a very broad scope. According to the basic principles that govern the application of the Environment Law, and as stated in the Constitution, citizens as well as the state bear responsibility for the protection of environment. Complementary to the Environment Law and its regulations, other laws also govern the protection and conservation of the environment, the prevention and control of pollution, and the implementation of measures for the prevention of pollution.

The Environment Law of 1983 has a comprehensive structure that has a holistic and integrated vision for the environment. "Polluter pays" and "user pays" principles and carrying capacity concepts form the basis of regulatory tools in the Environmental Law. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with EU legislation, thus contributing significantly to compensating the gaps within the former legislative system of Türkiye.

The EIA Regulation, which dates originally from 1998, has had several revisions and was most recently amended on July 29th, 2022. Although the EIA Regulation has been derived from the European Union EIA Directive, the integration of various Turkish conventions, sub-laws and governmental decrees makes the EIA Regulation distinctive in certain respects.

The lead government agency, responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for protection and conservation of the environment and for sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,
- Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
- Defining and applying environmental quality standards,
- Supervision of the network of environmental laboratories in Türkiye,
- Pollution control and inspection activities,
- Agroforestry support, soil management and erosion control, and
- Protection of Türkiye's natural heritage including national parks, areas of conservation interest, biodiversity and wildlife.

EIA Regulation Stakeholder Engagement Plan

Information sharing and stakeholder engagement are done within the scope of the provision published in the Official Gazette dated July 29, 2022, and numbered 31907 of ARTICLE 9-(5), "Informing the Public and Participating in the Process Meeting" of The Regulation of the EIA: *"To inform the public about the project and its effects, SEP is prepared by the institutions/organizations authorized by the Ministry to receive their opinions and suggestions. The prepared stakeholder engagement plan is presented in the EIA application file. When the Ministry deems it necessary, distribution of informative brochures, and questionnaires, conducting studies such as seminars or sharing information by preparing a website related to the project can be asked to inform the public throughout the EIA process by authorized institutions/organizations. In addition, if requested by the Ministry, this plan is updated during the EIA process."*

For the projects included in the Annex-1 list of the EIA Regulation, it is a legal obligation to organize the "Public Informing and Process Participation Meeting" to inform the local people who will be affected by the project.

This plan includes the stakeholders directly or indirectly affected by the Project, a public document presenting plans for engagement, and sharing communication information with the stakeholders. The project owner should ensure that environmental and social policies, national and international standards are met and in line with the requirements of credit institutions. The plan should be updated for each stage according to changing needs and conditions.

SEP must include a Project Overview, a Summary of Possible Social Impacts of the Project, National and International Stakeholder Engagement Plan Requirements, Stakeholder Identification (Local People, Local Administrations, National Administrations, Non-Governmental Organizations), Information sharing, Participation Activities, Public Informing and Participation in the Process Meeting, Complaint Mechanism, Monitoring and Reporting and Resources and Responsibilities.

2.2 International Standards

2.2.1 IFC Performance Standards

IFC's Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. PSs establish standards that the client is to meet throughout the life of an investment by IFC. Applicable standards guiding social studies are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 4: Community Health, Safety, and Security

- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires the client to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP to be include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

2.2.2 Equator Principles

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs.

The Client is committed to complying with the following EPs:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.
- Principle 4: Environmental and Social Management System and EPs Action Plan.
- Principle 5: Stakeholder Engagement.
- Principle 6: Grievance Mechanism.

- Principle 7: Independent Review.
- Principle 8: Covenants.
- Principle 9: Independent Monitoring and Reporting.
- Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, “For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. The client will tailor its consultation process to the risks and impacts of the Project, the Project’s phase of development, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.”

“To facilitate stakeholder engagement, the Kalyon Enerji will be commensurate to the Project’s risks and impacts, make the appropriate assessment documentation readily available to the affected communities, and where relevant other stakeholders, in the local language and a culturally appropriate manner.”

“The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis.”³

Principle 6 in specific sets out that “For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project’s environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process.”

2.2.3 World Bank

The World Bank ESS 10, “Stakeholder Engagement and Information Disclosure”, recognizes the importance of open and transparent engagement between the Borrower and Project stakeholders as an essential element of good international practice. Specifically, the requirements of ESS10 are as follows:

- Borrowers will engage with stakeholders throughout the Project life cycle, commencing such engagement as early as possible in the project development process and in a time frame that enables meaningful consultations with stakeholders on Project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential risks and impacts,
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation,

³ <https://equator-principles.com/>

- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose, as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

This standard requires the Borrower to develop a SEP proportionate to the nature and scale of the Project and its potential risks and impacts, disclose it as early as possible prior to Project appraisal, and seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP. In addition, the Borrower will also develop and implement a grievance mechanism to receive and facilitate resolutions of Project-affected parties' concerns and grievances related to the environmental and social performance of the Project in a timely manner.

2.3 Project Standards

The below listed policies were developed specifically for Project ANKA by Kalyon Enerji during ESIA process. The requirements included in these policies will also be applied for the Project. These policies will be adapted, revised if needed, and implemented for the Project.

- Integrated Management System Policy
- Health and Safety Policy
- Environment and Climate Change Policy
- Social Impact and Human Right Policy
- Human Resources Policy

3.0 STAKEHOLDER IDENTIFICATION

According to the IFC definition, the Stakeholders are persons or groups who are directly or indirectly affected by a project and those who are not directly affected by the project but that have an interest in a project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses and direct and third-party employees.

The overall aim of stakeholder identification is to identify and prioritise Project's stakeholders for the informed consultation and participation. Stakeholder identification is an ongoing process. The list of the identified stakeholders should be assessed and updated according to the outputs of the grievance mechanism and for the different phases of the Project, and the Project updates.

Potential stakeholders are categorised and prioritised according to affection status, interest level or ability of influence.

3.1 Project's Stakeholders

In general, stakeholders can be categorised into two groups:

- Primary stakeholders are the individuals and the communities who are affected by the Project impacts directly; and
- Secondary stakeholders are those who have an interest or influence on the Project (negative or positive).

The key stakeholders include:

- International bodies and organizations (e.g., international investors, international finance institutions, international non-governmental organisations (NGOs)),
- National Governmental Authorities,
- Regional Government Agencies/Authorities,
- Local Authorities,
- National and local NGOs and organizations,
- Trade unions and associations,
- Education and training institutions (e.g. Universities, colleges, think tanks),
- Industrial sector (e.g. construction and infrastructure trade bodies),
- Project Affected People (PAPs):
 - Mukhtars/local authorities of Project affected settlements,
 - Local community members,
 - Landowners and Land users (formal and informal land users), and
 - Vulnerable groups: the elderly, the disabled, female-headed households, landless-poor households and/or persons, ethnic minorities, immigrants, refugees, etc.
- Project employees, employee representatives,
- Third party goods and service suppliers, contractors, and its sub-contractors,
- Social services (e.g., hospitals, local schools, and other local community services), and
- Media.

Table 3 below represents the identified stakeholders in accordance with the above classification.

Table 3: Stakeholder Classification

Type	Stakeholders	Affected		Interested/ influenced
		Direct	Indirect	
Internal Stakeholders				
Project Owner	Kalyon Enerji Yatırımları A.Ş.	X		
Client	Kalyon YEKA GES 3 ve 4 Güneş Enerji Yatırımları A.Ş.,	X		
EPC	UKKA Group Limited	X		
Sub-contractor	Sub-contractors- to be determined.	X		
Employees	Project employees	X		
Consultants	Project consultants -to be determined.	X		
External Stakeholders				
International bodies and organizations	Lenders, potential lenders			X
National Governmental Authorities	Ministry of Energy and Natural Resources			X
Regional/Local Authorities	Gaziantep Governorship Gaziantep Governorship Şahinbey District Governorates Gaziantep Provincial Directorates of Central Government Institutions Gaziantep district directorates of central government institutions İpekyolu Development Agency Gaziantep Municipality Şahinbey district municipality Mukhtars of the Çörekli, Kürüm, Gülpınar, Ozanlı and Ufacık neighbourhoods	X		

National and organizations	Local NGOs and	Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) Gaziantep Development Foundation WWF Türkiye Women-specific associations İŞKUR			X
Education and training institutions		Gaziantep University Sanko University Hasan Kalyoncu University Gaziantep Islam, Science and Technology University Şahinbey District: There are 106 public preschools, 2 special education preschools, 132 public primary schools, 1 special education primary school, 98 public lower secondary schools, 1 special education public lower secondary school, 83 high schools, and 2 public education centres.			X
Social services		In Gaziantep, there are 7 State Hospitals, 16 Private Hospital, 3 Oral and Dental Health Centre, 6 Dialysis Centres, 2 Medical Centre, 3 Physical Therapy and Rehabilitation Training and Research Hospital and 2 Training and Research Hospital.		X	
PAPs	Local Communities	Residents of Çörekli, Kürüm, Gülpınar, Ozanlı and Ufacık villages	X		
PAPs Affected by Land Allocation of Pasture Land	People engaged with animal husbandry	Çörekli Kürüm Gülpınar Ozanlı Ufacık			
Media					X

		Gaziantep News	Gaziantep News Websites	Gaziantep Radio	Gaziantep TV Channels			
		Bizim Nizip Newspaper	https://bizimnizipgazetesi.com/	Gaziantep Kervan FM	Gaziantep GRT TV			
		Gaziantep 27 Newspaper	https://www.gaziantep27.net/	Davet Radio	Gaziantep Olay TV			
		Gaziantep Doğu Newspaper	https://gaziantepdogus.com	Radio Fıstık	Gaziantep Kanal 27 TV			
		Gaziantep Ekspres Newspaper	https://www.gazeteekspres.com	Radio Kilim	Gaziantep Kanal GAP TV			
		Gaziantep Güneş Newspaper	https://www.gaziantepgunes.com	Şafak Radio Gaziantep	Gaziantep Kanal Aşk TV			
		Gaziantep Hakimiyet Newspaper	https://www.hakimiyetgazetesi.com	Gaziantep GRT FM	Gaziantep Şahinbey TV			
		Gaziantep Oluşum Newspaper	https://www.gaziantepolusum.com	Gaziantep Nizip Radio	Gaziantep Olay Haber TV			
		Gaziantep Pusula Newspaper	https://www.gazianteppusula.com	Radio İhya	Gaziantep Zirve TV			
		Gaziantep Referans Newspaper	https://www.referansgazetesi.com.tr	Radio Zeugma	Gaziantep Haber TV			
		Gaziantep Zafer Newspaper	http://gaziantepzafergazetesi.com	Şirinnar FM				
		Gaziantep Denge Newspaper	https://www.gaziantepdenge.com					

		Metropol Newspaper	https://www.metropolgazetesi.com.tr					
		Olay Newspaper	https://www.olaymedya.com/					
		Gaziantep Sabah Newspaper	https://gaziantepsabah.com					
		Telgraf Newspaper	https://telgraf.net					
Third party good and services providers		To be identified						X

3.2 Identification of Vulnerable Groups

Vulnerable groups refer to the persons that have specific characteristics that make them more likely than others to require humanitarian assistance or being excluded from financial and social services. As also included in the IFC standards, the Client should take age, gender, ethnicity, mental and physical disability, poverty, socioeconomic status, educational levels, and dependence on unique natural resources of people into account.

According to the results of the surveys, vulnerable groups of the local communities were identified and presented in this SEP. The categories of vulnerable groups for this Project are defined as Illiterate, People who cannot speak Turkish, Seasonal workers, Nomads, Mobile beekeepers, Refugees, Women-headed households, People living with social assistance, Children of education age but not participating in education, Bedridden patients, People over 70 years old living alone, People with physical disabilities, People with mental disabilities, and earthquake victims.

Identification of vulnerable groups will be an ongoing process; therefore, the Project CLOs will be responsible to identify and continue to engage with vulnerable groups throughout the Project's lifespan.

From the early phases of the Project, special consideration and assistance will be provided to people identified as vulnerable to ensure inclusivity on decision making, grievance mechanism and information spread has been established to all targeted stakeholders. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner. Vulnerable groups of the local communities presented in Table 4.

Table 4: Vulnerable groups in the V/Ns

District	Settlement	Illiterate	Cannot speak Turkish	Seasonal worker	Mobile beekeeper	Refugee	Woman headed households	Living with social aid	At education age but not involved in education	Bedridden Patients	Living alone over 70 years old	People with physical disabilities	People with mental disabilities	Earthquake victims (number of household)	Persons engaged in unauthorized agricultural activities on public lands	Persons with unauthorized structures on public lands (house, workplace, barn, hut, etc.)
Şahinbey	Çörekli	1	0	0	0	7	0	2 (household)	0	0	0	0	0	2	0	0
	Kürüm	4	0	0	0	0	0	15 (household)	0	5	0	1	2	30	0	0
	Gülpınar	0	0	0	0	0	3	15 (ind)	0	0	2	0	3	23	0	0
	Ozanlı	0	0	0	0	2	0	3 (household)	0	0	0	0	0	0	0	0
	Ufacık	8	0	0	0	1	0	1 (household) 7 (ind)	0	0	0	1	0	2	0	0

4.0 STAKEHOLDER ENGAGEMENT TOOLS

The purpose of the identification of various tools and methods for the stakeholder engagement is to provide for all stakeholders to access the Project with the means of their choice to ensure meaningful stakeholder participation. The effectiveness of engagement tools will be monitored, and, if necessary, new engagement tools will be developed.

Table 5: Stakeholder Engagement Tools

Engagement Tools	Content of the Tools
Community meetings	The Client will conduct community meetings with the assistance of the Mukhtars in the affected settlements to inform the stakeholder on the environmental and the social impacts of the Project, introduce CLOs to the community members and inform them about the grievance mechanism.
Project website	<p>Project Owner has a website for its energy investments. A Project website will be established during the ESIA process. It is the most essential platform/tool for online engagement with stakeholders and it will be used to communicate up to date information related to the Project. The Project-related documentation, including NTS, SEP, Grievance Forms and other supporting management plans, will be disclosed through the Project's website. It will be ensured that the below listed documents, at minimum level, disclosed on the Project's website:</p> <ul style="list-style-type: none"> ■ Project information including the purpose of the Project, ■ Project location and general Project layout, ■ Permissions/approved EIA reports, ■ Project progress and timeline, ■ Environmental and Social Policy of the Project, ■ Non-Technical Summary, ■ SEP, ■ ESAP, ■ The grievance mechanism and the grievance forms will be available on the project website, ■ Frequently Asked Questions, ■ Job Application Form ■ Contact details of the CLOs and other relevant key personnel.
Phone calls, e-mails text messaging	<p>The phone number/e-mail address of the CLOs was distributed. CLO engages directly with stakeholders through phone calls or emails or text messaging on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested.</p> <p>Please See: myukseyayla@kalyonholding.com</p>
Project Hotline	<p>A hotline will be established to allow the project stakeholders convey their grievances (complaints, opinions, and suggestions etc.) during the ESIA process of the Project. This phone number is especially planned to ensure more active participation of vulnerable groups and women who have problems in accessing the internet. The phone number will be posted on stakeholder institutions such as provincial directorates, municipalities, the mukhtars' offices of the affected surrounding settlements, and public spaces.</p> <p>Project contact: +905466171719</p>

Engagement Tools	Content of the Tools
Project posters/ brochures / flyers / billboards	<p>A brochure for the Project will be developed that includes information about the Project, ESIA process and provides contact information (e-mail, phone, postal address and fax) of the and CLOs of the Project Company for any grievances.</p> <p>Brochures/flyers/poster/billboards with communication channels, announcements and information about the Project will be available in common public areas in surrounding settlements. Mukhtars' offices, municipalities, provincial directorates, stakeholder professional chambers etc.</p>
Grievance Mechanism - Grievance boxes (Wish and Complaint Boxes) for employees and for external stakeholders	<p>A grievance mechanism (including both internal for workers and external for community) allowing stakeholders to raise concerns or complaints personally and via post, electronic mail etc. was developed for the Project and this mechanism was adopted to the Project.</p> <p>For the employees working at the Project will be provided grievance boxes to convey their complaints, concerns and opinions through these boxes. It should be located in areas that can be easily reached by the employees, such as the cafeteria and resting area.</p> <p>Grievance boxes, including simple-to-use forms were placed at points where external stakeholders can easily access to share complaints, suggestions and opinions. Especially the disadvantaged stakeholder groups and vulnerable groups living in the affected settlements will be considered. Project grievance boxes for external stakeholders should be placed in mukhtars' offices, village cafes, and public spaces in the affected settlements</p>
Newspaper	As appropriate, relevant Project information will also be provided to public media. This activity will mainly be undertaken during ESIA disclosure and construction. It will also occur if any significant changes to the Project are envisaged, impacting local communities or land uses.
Face to face meetings	Open and targeted meetings will continue to be held to engage with stakeholders.

5.0 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES BY KALYON

5.1 Stakeholder Engagement Meetings under EIA Process

Public participation meetings are held in the nearest settlement to the project in order to inform the public and stakeholders likely to be affected by the project, and to receive their opinions, concerns, complaints and suggestions about the project.

The purpose of the meeting is to evaluate the opinions, suggestions, concerns and complaints of the public and other relevant stakeholders and to include them in the project. In order to inform the public about the meeting, an advertisement was placed in a national newspaper and a local newspaper at least 10 days before the meeting.

The meeting was announced in 2 different newspapers, namely the Takvim Newspaper, which is broadcasting at the national level before the meeting date, and Gaziantep 27 in the province for the purpose of public announcement. A presentation and a brochure have been prepared for the meeting. The attendants of the meeting are:

- Ministry of Environment, Urbanization and Climate Change General Directorate of EIA, Permission and Inspection,
- Gaziantep Provincial Directorate of Environment, Urbanization and Climate Change,

- Gaziantep Metropolitan Municipality,
- Kalyon Enerji Yatırımları A.Ş.,
- EN-ÇEV Enerji Çevre Yatırımları ve Danışmanlığı Haritacılık İmar İnş. A.Ş.,
- Kürüm and Çörekli Mukhtars,
- And local people.

Within the scope of the project in question, it was held in Kürüm Village Condolence House on 22.04.2022 in order to ensure the participation of the public in the EIA process, to inform them about the project and to receive their opinions and suggestions pursuant to Article 9 of the Environmental Impact Assessment (EIA) Regulation, which was published in the Official Gazette dated 29.07.2022 and numbered 31907, which was in effect as of the preparation date of the EIA Application File. At the Public Participation Meeting, the participants were given detailed information about the planned activity by making a visual presentation by En-ÇEV A.Ş. The questions asked about the project were answered by the officials of EN-ÇEV A.Ş and Kalyon Enerji Yatırımları A.Ş. and detailed information was given about the procedures to be carried out in the next stages.

Previous stakeholder engagement activities by the Client are presented in Table 6 and Table 7.

Table 6: Stakeholder Meeting Calendar

Stakeholder Engagement Activity	Number
Community pre-construction meeting	5
Consultation meeting	0
Women focus group meeting	5
Community Health and Safety Awareness Meeting	0
Local Authorities Meeting	2
Mukhtar Meeting	15
Interviews on CDP	0
TOTAL	27

Table 7: Women Focus Group Meetings by Kalyon

Village	Date
Ufacık	24.05.2023
Gülpınar	24.05.2023
Kürüm	25.05.2023
Ozanlı	26.05.2023
Çörekli	27.05.2023

6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 Stakeholder Engagement Activities for ESIA

6.1.1 Area of Influence

The Area of Influence ("Aol") of the Project is the area in which a direct or indirect impact on the biological, physical, and social components might occur.

As defined by IFC PS1, the Area of Influence encompasses:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.
- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The baseline conditions represent the environmental (i.e., physical, and biological components) and social context prior the realization of the Project, thus, before any possible disturbance from Project activities may occur. The definition of the baseline conditions represents the starting point upon which the impact assessment is built. The goal is to assign a sensitivity value to each environmental and social component expected to be affected by the Project.

The social area of influence of the project as presented in Table 8. Regional Study Area (RSA) term is also used in the methodology as a source of high-level information in case of absence of site-specific data at the Aol level or regional level data is required to define the components and assess the impacts. As such, the RSA contains the Project Aol.

Table 8: Area of Influence – Social Components

ESIA Component	Aol
Socioeconomical	Aol includes Çörekli, Kürüm, Gülpınar, Ozanlı and Ufacık villages
Cultural Heritage	Aol includes the Project footprint

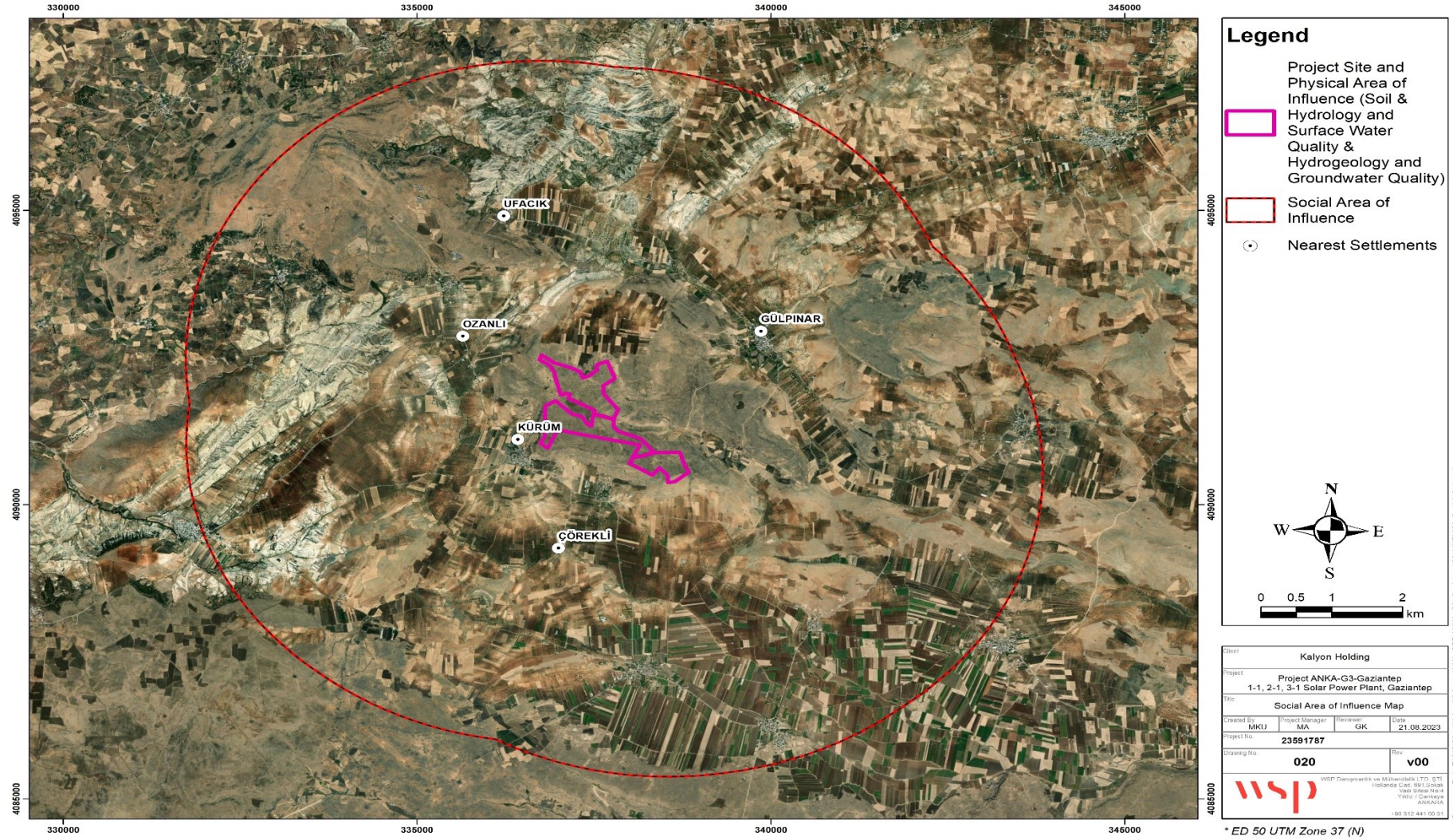





Figure 3: Area of Influence Map of the Project

6.1.2 Field Studies

The sample photographs of the field survey are presented in Table 9. Certain districts were visited more than once since some districts have many villages that bear the potential to be impacted by the Project.

Table 9: Field Surveys performed by WSP Türkiye

Province	District	Date	Photographs
Gaziantep	Şahinbey	07.06.2023 08.06.2023	 <p>Kürüm Village, 07.06.2023</p>
			 <p>Çörekli Village, 07.06.2023</p>

Province	District	Date	Photographs
			 <p>Ozanlı Village, 07.06.2023</p>
			 <p>Gülpınar Village, 08.06.2023</p>

Province	District	Date	Photographs
			 <p>Ufacık Village, 08.06.2023</p>

7.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement programme aims to inform, disclose and consult with all stakeholders using the various engagement tools. Different engagement tools are proposed to ensure Informed Consultation and Participation during the Project implementation in a culturally appropriate manner, respectful of human rights and considering gender inclusion.

Following the approval of the Project documentation, including but not limited to, the ESIA, NTS, RAP and the other supporting management plans, will be disclosed on the Project's website, and the hard copies of the NTS and SEP will be provided to the affected Mukhtars for the distribution to the PAPs. The NTS will cover the following:

- Brief description of the Project,
- Project timeline,
- Information on environmental and social studies carried out to date,
- Impact summary and mitigation measures,
- Tools for the submission of grievances, comments and feedback.

7.1 Proposed Strategy for the Information Disclosure

Full ESIA, SEP and other management plans will be disclosed electronically on the websites of the Project and will be available in Turkish and English. In addition, hard copies of the SEP and NTS will be available in the mukhtars' offices in the affected settlements.

Further announcement regarding the Project updates and awareness, following tools will be used:

- Project website,
- Social media,
- Local and Regional media

- The notice boards of the mukhtars' offices, and
- Leaflets and banners.

All NGOs and associations, and other interested organizations, identified in Table 4 will be notified on the disclosure process and the relevant website links of the Project documents will be shared with them. When required, copies of the disclosure package will be sent as an e mail or hard copies of the disclosure package will be sent via post mail.

ESIA disclosure notifications will be published in the local and regional media.

During the Project development and construction phase, the CLOs will prepare monthly reports that present the project's social performance and the engagement activities and the grievance mechanism outputs.

ESIA Feedback Form is presented in Appendix A.

7.2 Proposed Strategy for Consultation

This SEP is developed to engage with the stakeholders during the Project's pre-construction (including planning), construction and operation phases to inform stakeholders on the Project activities, resolve their grievances, and involve stakeholders during the decision processes in a participatory approach. In order to establish sound stakeholder engagement activities following consultations strategies will be applied from the early phases of the Project as:

- Women CLOs will be hired to encourage the participation of women, receive and report gender-specific grievances, and conduct "Women Only" consultation activities when required. During the Project process, one of the environmental engineers at the Project area is a woman. She will be contacted to encourage women's participation, to receive and report gender-specific complaints, and to conduct "Women Only" advisory activities as needed.
- Targeted consultations will be carried out with the identified vulnerable people to ensure their participation during the information disclosure, engagement and grievance management.
- All proposed channels will provide the names of the CLOs, the contact details and the grievance mechanism.

Consultation Meeting Form and Consultation Meeting Register of the Client used for the Project ANKA and will be adapted to the Project is presented in Appendix B and Appendix C, respectively.

7.3 Proposed Programme for Project Phases

Pre-construction phase activities will focus on disclosing the Project information, including the construction schedule and land entry topics.

With ESIA development, ESMS and related management plans will be produced and the ESMS will be structured to reduce the impacts of labour and working conditions, community health and safety, transportation etc. during construction phase. Construction phase engagement activities will focus on the minimisation of the Project related construction impacts. During the construction phase, the environmental and social management system will be structured to reduce the impacts of labour and working conditions, community health and safety, transportation impacts are mitigated with the implementation of the relevant management plans by contractors and subcontractors. The SEP will be updated based on the feedbacks received during ESIA disclosure period. The identified stakeholders will be re-assessed, and stakeholder list will be updated when necessary. Stakeholder engagement activities will be conducted regularly during the construction phase to inform stakeholders about the status of Project-related activities. Special works (cut of energy resources, disruptions

in public roads etc.) within the scope of construction activities will be communicated to the stakeholders by CLOs.

Pre-construction phase activities will focus on disclosing the Project information, including the Project route, construction schedule, land acquisition and land entry topics.

With ESIA development, ESMS and related management plans will be produced and the ESMS will be structured to reduce the impacts of labour and working conditions, community health and safety, resettlement and economic displacement, transportation etc. during construction phase. Construction phase engagement activities will focus on the minimisation of the Project related construction impacts. During the construction phase, the environmental and social management system will be structured to reduce the impacts of labour and working conditions, community health and safety, resettlement and economic displacement, transportation impacts are mitigated with the implementation of the relevant management plans by contractors and subcontractors. The SEP will be updated based on the feedbacks received during ESIA disclosure period. The identified stakeholders will be re-assessed, and stakeholder list will be updated when necessary. Stakeholder engagement activities will be conducted regularly during the construction phase to inform stakeholders about the status of Project-related activities. Special works (blasting, cut of energy resources, disruptions in public roads etc.) within the scope of construction activities will be communicated to the stakeholders by CLOs.

Table 10: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
Before Construction	Project Affected People (Land users Residents of the settlements in the Area of influence Vulnerable people	ESIA Disclosure	The Mukhtars and settlements to be informed. Project website, Social media, Local and Regional media When required copies of the disclosure package will be sent as an e mail or hard copies of the disclosure package will be sent via post mail.	Covering all Aol	Before construction	Kalyon Enerji EPC
	Project Affected People (land users, Residents of the settlements in the Area of influence Vulnerable people	Community health and safety issues, Measured to be applied for the prevention of traffic due to construction works	All necessary legal permits shall be obtained	Settlements of Çörekli Kürüm Gülpınar Ozanlı Ufacık	Before construction	Kalyon Enerji EPC

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	Project Affected People Land users, Residents of the settlements in the Social area of influence Vulnerable people	Introduce CLOs of EPC and their responsibilities and contact details Project update Grievance mechanism process Employment Vulnerability and gender issues Community health and safety issues	Public meetings, Training/workshops. Public notices; Electronic publications via online/social media and press releases; Distribution of the hard copies of the Project documents to Mukhtar offices Media announcements Information leaflets and brochures; Women only focus group discussions	In each settlement Project office as per the request of the PAPs	Before construction	Kalyon Enerji EPC
	Project Affected People Residents of the settlements in the Social area of influence Vulnerable people	Community health and safety issues, Measured to be applied for the prevention of traffic due to construction works	Pre-construction survey Consultation meetings	In each settlement Project office as per the request of the PAPs	Before construction	Kalyon Enerji EPC
	Governmental Parties Municipalities Governors District authorities Academic institutions	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement process and the grievance mechanism process	Individual meetings General meetings Official correspondence Mail, phone calls	Institution visits Project office as per the request of the stakeholders	When required	Kalyon Enerji EPC
	Non-governmental Parties Press and media; NGOs; Businesses and	Environmental and Social Impacts of the Project and the mitigation measures	General Public meetings, Press releases	Institution visits Project office as per the request of the stakeholders	In each Project phase and when required	Kalyon Enerji EPC

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	business organisations; Workers' organisations;	Stakeholder engagement process and the grievance mechanism process	Information leaflets and brochures; audio-visual materials			
Construction	Project Affected Parties - Project Affected People Residents of the people in the Project Aol Vulnerable groups Local businesses	To update information on the updated construction status Receive construction-related grievances Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule	General Public meetings, Continuous communication with the Project CLOs Training Women only focus group discussions Phone notifications Social media Press release Grievance mechanism Project website	In each settlement Project office as per the request of the PAPs	Quarterly meetings in all affected settlements	Kalyon Enerji EPC Subcontractors
	Other Interested Parties Governmental intuitions National and local media Non-governmental institutions Business organisations	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule	General information meetings Press release Institution visits Grievance mechanism	Institution visits Project office as per the request of the stakeholders	Biannual meetings When required	Kalyon Enerji EPC Subcontractors

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	Project Affected People land users, Residents of the settlements in the Area of influence Vulnerable people	Community health and safety issues, Measured to be applied for the prevention of traffic due to construction works	Post-construction building condition surveys, and compensation provided by Kalyon when necessary, Grievance records related to the traffic.	Settlements of Çörekli Kürüm Gülpınar Ozanlı Ufacık	During construction and operation	Kalyon Enerji EPC
Operation	Project Affected Parties - Project Affected People Residents of the people in the Project Aol Vulnerable groups Local businesses	The transition process from the construction and operation phase Introduce operation phase CLOs Operation phase E&S issues, especially community health and safety Information disclosure on national and local media Brochures and information banners at the stations	General information meetings, Workshops, Individual meetings Press releases Grievance mechanism	In each settlement Project office as per the request of the PAPs	Following the completion of the construction	Kalyon Enerji
	Other Interested Parties (External) Governmental and Non-governmental bodies Local businesses	Information disclosure on national and local media Brochures and information banners at the stations	Press releases Grievance mechanism	Institution visit Project office as per the request of the stakeholders	Following the completion of the construction	Kalyon Enerji

8.0 GRIEVANCE MECHANISM

A grievance is considered any complaint or opinion (including comments/feedback/questions/suggestions/request) regarding the execution of the Project and impacts from project activities. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies. The objectives of the grievance mechanism are to:

- Provide affected people with culturally appropriate ways and means of stating their grievances during the Project (from site preparation to decommissioning phase),
- Ensure that grievances are treated confidentially and are not shared outside the process,
- Establish transparent and mutually respectful relations with communities,
- Ensure that corrective actions are identified and taken,
- Verify that affected people are satisfied with the corrective actions taken; and
- Avoid the need for judicial actions; the grievance mechanism, however, does not prevent stakeholders from accessing the judiciary system.

The Grievance mechanism has been developed for the Project ANKA by Kalyon Enerji a part of the ANKA SEP of the Project, explaining the management process that will ensure that the complaints of the stakeholders are resolved in a healthy, correct and timely manner. The details about the grievance mechanism implemented for the Project ANKA and will be adapted to the Project presented in the following sections.

8.1 Governmental Grievance Mechanism- all stakeholders

The public can raise any issues, complaints and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and government open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints and requests can be both received and responded to through this national online system.

Still, a separate grievance mechanism system has been established for the Project ANKA and will be adapted to the Project in which the stakeholders can receive their responses locally and communicate their complaints. Complaints received will be forwarded to the relevant government departments and followed up.

8.2 Internal Grievance Mechanism – for Workers

The internal grievance mechanism of Kalyon Enerji (developed for ANKA Project) will be adopted for the Project. All direct and indirect Project workers will follow this procedure. The procedure defines grievances as a statement of dissatisfaction over any condition that allegedly harms the employee. A grievance may relate to matters involving internal communication, responsibilities abuse, abuse in the authority line, race, colour, ancestry, national origin, religion, age, sex, sexual orientation, gender identity, sexual harassment, or disability status.

In case requested, all grievance holders will have the right to remain anonymous and maintain their confidentiality. Kalyon Enerji will not disclose any grievance holder's credentials without ensuring their consent first. If such consent is given, only the managers and personnel related to that specific grievance will be informed.

Employee Request and Grievance Register of Kalyon Enerji used for the ANKA Project and will be adapted to the Project is presented in Appendix E, respectively.

8.3 External Grievance Mechanism – for communities

An external grievance mechanism of Kalyon Enerji will be adopted for the Project. External grievance mechanism is a part of the management system and it is responsive to any concerns and complaints, particularly from affected stakeholders and communities. Special care will be focused on training the designated staff involved in the management of the grievance mechanism. The overarching aim of this grievance mechanism is to provide all stakeholders with the opportunity to obtain information about Kalyon's activities and facilities, deliver their complaints and requests in a structured and formal manner and receive prompt, fair and effective responses.

Any comments or concerns will be brought to the Company's attention verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Company website, at the Project site, at the mukhtar's office, alongside a description of the grievance mechanism. Grievance forms can then be submitted to the contact points whose details are provided in LIABILITIES. All grievances will be:

- Acknowledged within seven days after receipt; and
- Responded no later than within 30 days after receipt.

Specifically, nominated and trained members of staff will record grievance information in a grievance register the information in the grievance register will include Stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out. The process is elaborated in Figure 4 below.

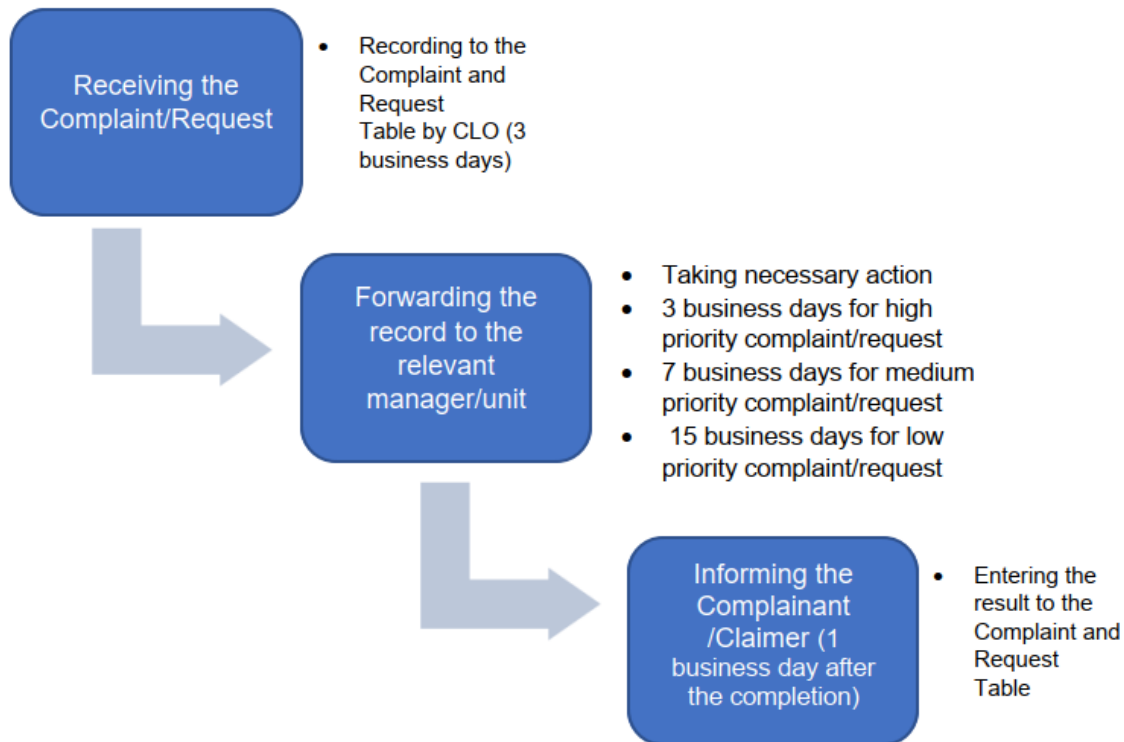


Figure 4: Grievance Management Procedure

Individuals can request the right to have their names kept confidential, and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

- Step 1: receipt of grievance and registering of grievance (3 business days),
- Step 2: assessment,
- Step 3: acknowledgement of grievance (acknowledged within seven days after receipt),
- Step 4: investigation and resolution of grievance,
- Step 5: closure; and (30 business days)
- Step 6: outcome of the corrective action (1 business day after completion).

Appeals Committee

In case the complainants are not satisfied with the decision of Kalyon Enerji and/or EPC on their complaints, they can refer to the Appeals Committee via Kalyon Enerji social impact team.

Appeals Committee consisting of Kalyon Enerji management teams is responsible for ensuring grievance mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

The mandate of the Appeals Committee covers considering complaints on the issues listed below (excluding those related with Labour Law and Expropriation Law):

- Unsolved grievance related to damage to environment,
- Unsolved grievance related to damage to public assets and infrastructure,
- Unsolved grievance related to damage to private assets (land, crops, houses etc.),
- Unsolved grievance related to impacts on livelihood,

The Appeals Committee carries out the following tasks:

- Meeting at least once a month or more often depending upon the existence of unresolved disputes,
- Reviewing the complaints by hearing both complainants and Kalyon Enerji and/or EPC
- Investigating the complaints in accordance with project requirements, Kalyon Enerji Policies, legal framework and referring to relevant expertise where required,
- Preparing an evaluation report based on the inquiries,
- Making a proposal on resolution of the disputes between parties.

The decision of the Appeals Committee is not binding and if parties do not agree on the Appeals Committee proposal, they still have the opportunity to either negotiate or litigate.

The Appeals Committee consists of the following members:

- Chief Sustainability Officer
- Chief Operation Officer
- Chief Legal and Compliance Officer
- Chief Business Development Officer
- Chief Finance Officer

- Social Impact and Inclusion Manager (secretary)
- Human Resources Manager (secretary)
- Subject Matter Expert, if required

The grievance mechanism is widely announced to the public with stakeholder meetings held for project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism that also allows anonymous grievances.

Gender equality is observed by Kalyon Enerji. There is a woman environmental engineer in the Project. She will deal with the complaints and demands of women in the Project area. The grievances will be reviewed by the team according to the Project human rights and grievance mechanism.

Stakeholder Request and Grievance Form and Stakeholder Request and Grievance Register of Kalyon Enerji used for a previous project and will be adapted to the Project is presented in Appendix F and Appendix G, respectively.

9.0 MONITORING

The monitoring measures are to be implemented throughout the Project phases to assess compliance of the SEP with the Project standards. The stakeholder engagement process of the Project will be monitored periodically, as indicated in Table 11. According to the outputs of the monitoring indicators, the SEP need to be updated to implement necessary corrective actions during the different stages of the Project. The monthly summaries, statistics of the consultation activities and grievances will be provided to the Corporate Sustainability Team of Kalyon Enerji by CLOs during the construction phase with the assistance of Kalyon Enerji. The stakeholders will be engaged during the construction and operation phases of the Project on the Project environmental and social impacts. Kalyon Enerji will continue to engage with and provide information to project-affected parties and other interested parties throughout the different phases of the Project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the Project.

Additional information may need to be disclosed at key stages in the Project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism has identified as of concern to stakeholders.

As implementation of a project progresses, new impacts may arise, while other impacts may be eliminated. Kalyon Enerji will provide regular updates to stakeholders on project environmental and social performance (environmental measurement results, grievance resolution processes) and schedule.

Kalyon Enerji will continue to conduct stakeholder engagement in accordance with the SEP, in particular, the feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures.

If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, Kalyon Enerji will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. Kalyon Enerji will disclose an updated environmental and social management plan, setting out any additional mitigation measures.

During the operation phase, Kalyon Enerji will be responsible for managing and monitoring the SEP.

Monthly summaries will be used to assess:

- Transparency and accessibility of the engagement process,

- Provision of relevant information,
- Timeliness in responding (ongoing communication),
- Clarity and simplicity of the information provided,
- Project impacts; and
- Applicability and relevance of the information provided.

The SEP will be reviewed annually and updated if required. A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. The KPIs for an effective stakeholder engagement process that will be assessed during the monitoring process are presented below.

Table 11: Key Performance Indicators (KPIs)

Consultation and Information Disclosure			
SEP-KPI-01	Number of stakeholder engagement activities	Target of 100%	Consultation Meeting Register
Implementation of Grievance Mechanism			
SEP-KPI-02	Number of complaints/ grievances received from community	The target of 100%	Request and Grievance Register
SEP-KPI-03	Number of complaints/grievances responded to within targeted time frame	The target of 100%	Request and Grievance Register
SEP-KPI-04	Number of unresolved grievances conveyed to Appeals Committee	The target of 100%	Grievance Register
SEP-KPI-05	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame	Audit report
SEP-KPI-06	Disclosure of Project's annual Environmental and Social Monitoring Report	Project's Annual Environmental and Social Report will be disclosed that includes; Environmental Performance Management; Water Management, GHG Emissions and Energy Monitoring, Noise Management, Waste Management, Biodiversity Conservation, and Social Performance Management; Stakeholder	Annual Environmental and Social Report (AESMR)

		Engagement, Community Development Program, Community and Occupational Health and Safety	
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10.0 REPORTING

Monthly summaries of grievances raised by internal and external stakeholders, queries and related incidents, and the implementation status of corrective/preventive actions, consultations, and disclosure activities will be referred to the Kalyon Enerji in all phases of the Project and the construction period. Monthly summaries will be used to assess both the number and nature of complaints/grievances (if any), along with the Kalyon Enerji's ability to address complaints in a timely and effective manner.

The Request and Grievance Register (both for internal and external stakeholder, Appendix E and Appendix G) will be kept updated by CLOs all the time.

To inform the external stakeholders AESMR will be developed and published on the Project's website.

The annual AESMR will include the followings.

- Project progress details,
- Status of the ESAP implementation,
- Environmental monitoring data results (waste, air, etc.)
- Resource utilisation and product output,
- Human resource management, (number of workers, women workers, local workers etc.)
- Occupational Health and Safety,
- Stakeholder Engagement
 - Meeting or other initiatives to engage with members of the public or public organisations during the report period,
 - Information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues
 - Coverage in media,
 - Interaction with any environmental or other community groups, NGOs etc., and
 - Complaints/grievances that the Project received from members of the public or civil society organisations during the reporting period.

Brief NTS of AESMR will be shared with affected parties (e.g. via mukhtars' offices) in addition to hard copies of full AESMRs.

Table 12: Monitoring Time Frame

Monitoring Type	Frequency	For	Content
Reporting	Monthly	Project management	Detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting	Annually	Project management	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Performance Monitoring	Biannual	Project management	Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of stakeholders/PAPs consultations/meetings
Impact Monitoring	Biannual	Project management	Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions

10.1 Reporting Back to Stakeholder Groups

The monitoring process of the stakeholder engagement process will be comprised of two main components including the consultation and information disclosure and the grievance mechanism.

The company will use, two main tools to ensure the involvement of the stakeholders to the monitoring process. The monthly reports that will be prepared by the Project CLOs contains detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance will be published in the Project website quarterly and anonymously.

In addition annual environmental and social report of the Project will contain details of meeting or other initiatives to engage with members of the public or public organisations during the report period, information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues, coverage in media and interaction with any environmental or other community groups many complaints or grievances did the Project receive from members of the public or civil society organisations during the reporting period and Community Interaction and Development.

The hard copies of the annual reports will be distributed to Mukhtars.

On the website of the Project and the annual reports will have the feedback mechanism for the comments of the stakeholders on the monitoring process.

11.0 ROLES AND RESPONSIBILITIES

During the construction phase of the Project, the following roles and responsibilities will be implemented by Kalyon Enerji.

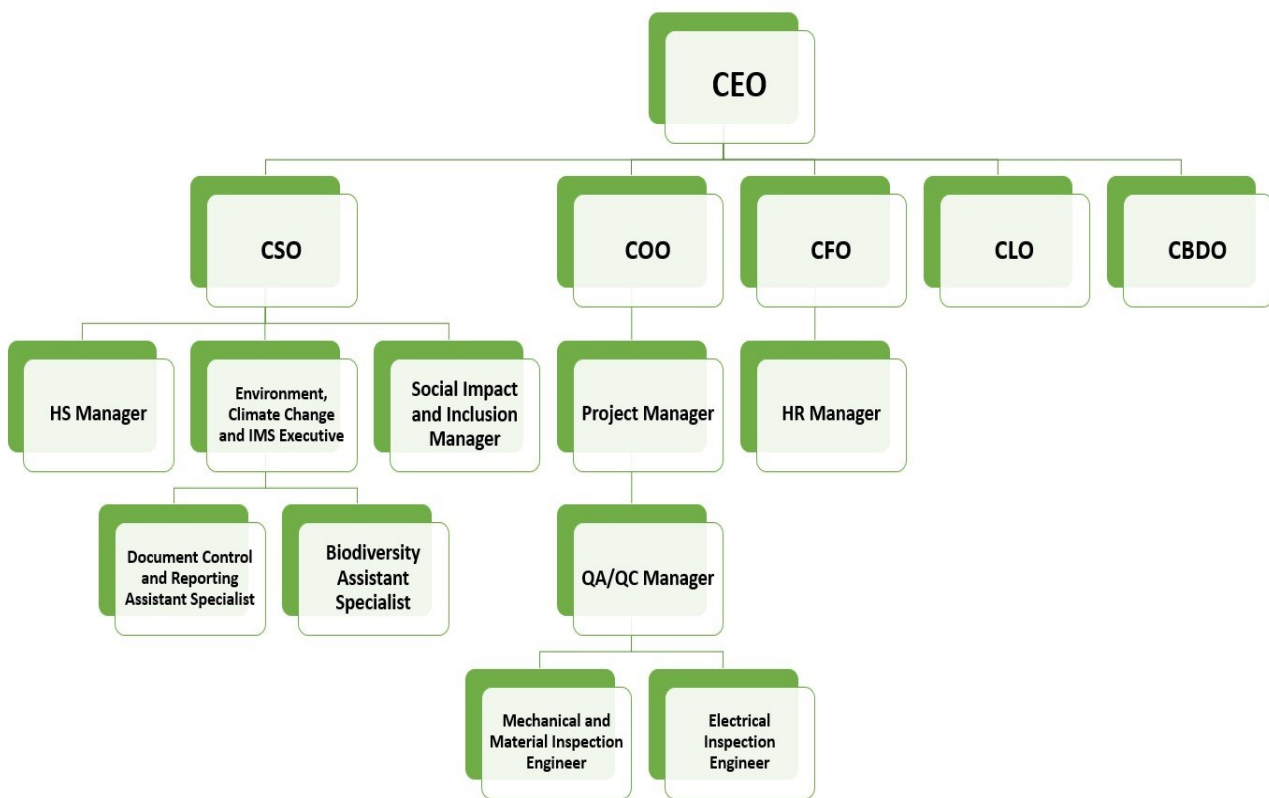


Figure 3: Client Organization Structure

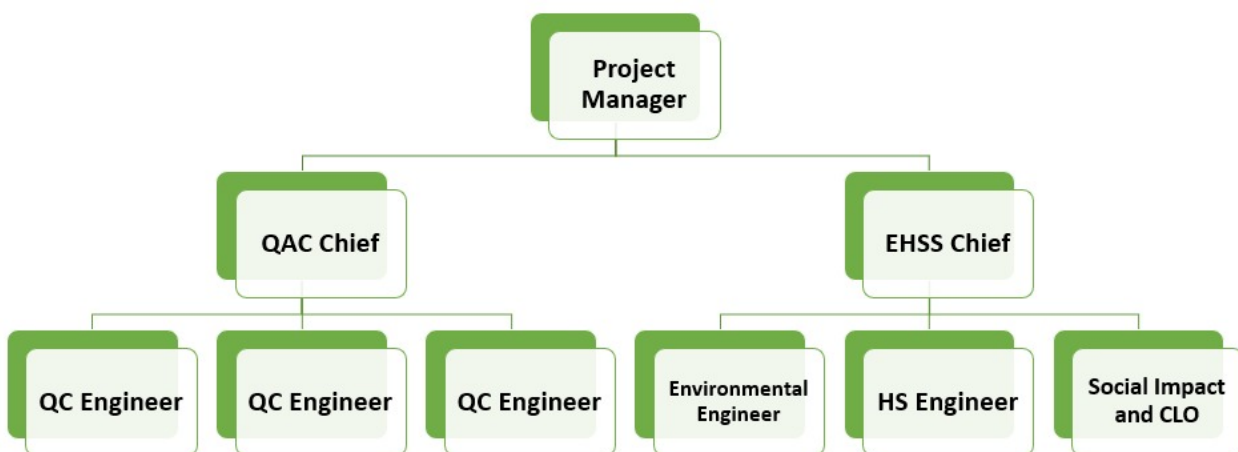


Figure 4: EPC Organization Structure

Table 13: Roles and Responsibilities

Roles	Responsibilities
Kalyon Enerji Chief Sustainability Officer	Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements.
Kalyon Enerji Chief Operation Officer	Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
Kalyon Enerji Project Manager	Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level
Kalyon Enerji Social Impact and Inclusion Manager	Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
Kalyon Enerji HS Manager	Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
Kalyon Enerji Environment, Climate Change, and IMS Executive	Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
EPC Project Manager	Ensure adequate resources are provided for implementation of this Plan Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
EPC EHSS Department	Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.

Roles	Responsibilities
EPC Personnel Affairs Chief	<p>Maintain HR records.</p> <p>Process HR transactions.</p> <p>Regulatory compliance related to recruitment, employment and training.</p> <p>Report to government and other bodies on compliance with commitments and on other occasions as required by legislation.</p> <p>Organize the trainings related to this procedure for the personnel they are responsible for this Plan.</p> <p>Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits</p>
Community Liaison Officers	<p>Review the Grievance tracking system weekly</p> <p>Prepare monthly reports on the grievances and the stakeholder engagement activities monthly</p> <p>Report to E&S Manager</p> <p>Work in cooperation with other departments to determine targets for Environmental, Social, health and safety issues</p> <p>Keeping the record of the grievances in the Request and Grievance Register with details (raised by who, date, status (open, awaiting or closed) etc.)</p> <p>Supporting E&S Manager on the first evaluation of the relevance of grievances collected</p> <p>Ensure all complainants are informed within one week, and complaints are resolved within one month</p> <p>Provide regular reporting back to the community on the community grievances</p> <p>Record all formal and informal engagement activities with local communities in the stakeholder management system</p> <p>Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted into stakeholder engagement quarterly reports</p> <p>Monitor and record the social responsibility activities carried out in the scope of the Project, and these records will be inserted into stakeholder engagement quarterly reports</p> <p>Being in contact with stakeholder meetings to collect the responses to grievances actively</p>
Security	<p>Control incoming and outgoing traffic at all times.</p> <p>Report all security issues to the EHSS Chief</p> <p>Involve in the investigation team for the investigation of the security incidents.</p> <p>Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions.</p> <p>Ensure all mitigation measures and management controls are implemented properly.</p> <p>Ensure that only properly trained and qualified security personnel are employed.</p> <p>Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.</p>
Sub-contractors	<p>Develop its own procedure to fully implement this Plan.</p> <p>Ensure compliance with Project standards and contractual agreements.</p> <p>Ensure related non-compliances are recorded and responded to immediately.</p> <p>Conduct internal audits and record identified incompliances.</p> <p>Provide related trainings.</p> <p>Appoint a responsible person for activities defined in this Plan.</p> <p>Provide staff, equipment and material for the implementation of measures defined in this Plan.</p>

Roles	Responsibilities
	Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
All Employees	Participate in the trainings. Ensure compliance with measures defined in this Plan.

12.0 LIABILITIES

A team was assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management for the construction phase of the Project.

Project website: kalyonenerji.com

Address: Ehlbeyt Mahallesi Mevlana Bulvarı No:201 Balgat-Çankaya/ANKARA

Hotline: +90 536 271 81 13

e-mail: enerji-iletisim@kalyonenerji.com

For the grievances and the requests related with the Project please contact: Site Social Impact Specialist and CLO Mehmet Yüksekayla myuksekyayla@kalyonholding.com

For the operation phase of the Project, a separate team will be assigned to perform the stakeholder engagement activities. These activities include identification of stakeholders, update stakeholder list, disclose Project related information, conduct consultation with the target stakeholder groups with the identified tools, manage the external grievances and report to top management periodically.

13.0 REFERENCES

- **IFC Performance Standards 2012:**
https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance Standards
- **Equator Principles 2020**
<https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>
- Official EIA Decision letters of Project ANKA (Section 1 and Section 2))
- Kalyon Enerji's Policies
- Integrated Management System Policy
- Health and Safety Policy
- Environment and Climate Change Policy
- Social Impact and Human Right Policy
- Human Resources Policy

Signature Page

WSP Danışmanlık ve Mühendislik Ltd. Şti.

Elçin Kaya, Esra Güven
Sociologist, Sociologist

Merve Acırlı
Project Manager

EK/EG/MA

Registered in Turkey Registration No. 53/3069

APPENDIX A


ESIA Feedback Form

You can write your questions and opinions about the Environmental and Social Impact Assessment study prepared Project to the following addresses.

ESIA Feedback Form	
Name-Surname	
Address	
Phone Number	
Date	
Concerns, expectations, questions or complaints on the ESIA report	

APPENDIX B

Consultation Meeting Form

		PAYDAŞ İLETİŞİM FORMU		Doküman No: Yayın Tarihi: 21.09.2020 Rev No: 00 Rev. Tarihi: -
İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)				
Tarih:				
İrtibat Bilgisi: (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz)				
Posta yolu ile				
Telefonla				
E-posta yolu ile.....				
Tepkinizi belirtin: <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet			Doldurulmuş İletişim formu suretinin alındığını teyit eden imza	
Kaydeden: <input type="checkbox"/> Yorum/ şikayeti sunan kişi			
<input type="checkbox"/> Diğer (lütfen kim olduğunu belirtin)				
PROJE HAKKINDAKİ YORUMLARINIZ (Gerekirse sayfanın arka kısmından devam edebilirsiniz)				
YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER				
Yorum/Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz)				
Yorum/Şikayetle İlgili Olay Tarihi				
<input type="checkbox"/> Tek seferli olay / şikayet (Tarih:)				
<input type="checkbox"/> Bir defadan fazla mı oldu (Kaç kez?)				
<input type="checkbox"/> Devam ediyor (Problem halen yaşanıyor)				
Problemi çözümlmek için ne öneriyorsunuz? (Gerekirse sayfanın arka kısmından devam edebilirsiniz)				
Bu kısım Proje Yönetimi tarafından doldurulacaktır.				
YORUM DURUMU				
Yorum Kayıt (E/H)		Sunum tarihi:		Kaydeden:
Gerekli Tepki (E/H)		Müdahale tarihi:		
ŞİKAYETÇİ DURUMU				
Şikayet Kayıt (E/H)		Sunum tarihi:		Kaydeden:
Cevap Gönderim Tarihi:		Şikayet kapatıldı (E/H):		Kapama tarihi ve imzası:
İrtibat Numarası			0536 271 81 13	

APPENDIX C

Consultation Meeting Register

[illegible]


APPENDIX D

**Employee Request and
Grievance Register**

NO	SECTION	CONTRACTOR	TYPE	SUBJECT	POSITIVE/NEGATIVE EVIDENCE	OBSERVATION	RESPONSIBLE UNT	CHECKED BY	TAKEN ACTION	STATUS	REPEAT	COMPLAINT DATE	DUE DATE	CLOSING DATE	OVERDUE DAYS	OPEN FOR... DAYS	NOTES

APPENDIX E

**Stakeholder Request and
Grievance Form**

	PAYDAŞ İLETİŞİM FORMU		Doküman No: Yayın Tarihi: 21.09.2020 Rev No: 00 Rev. Tarihi: -
İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)			
Tarih:			
İrtibat Bilgisi: (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz)			
Posta yolu ile			
Telefonla			
E-posta yolu ile.....			
Tepkinizi belirtin: <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet		Doldurulmuş İletişim formu suretinin alındığını teyit eden imza	
Kaydeden: <input type="checkbox"/> Yorum/ şikayeti sunan kişi			
<input type="checkbox"/> Diğer (lütfen kim olduğunu belirtin)			
PROJE HAKKINDAKİ YORUMLARINIZ (Gerekirse sayfanın arka kısmından devam edebilirsiniz)			
YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER			
Yorum/Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz)			
Yorum/Şikayetle İlgili Olay Tarihi			
<input type="checkbox"/> Tek seferli olay / şikayet (Tarih:)			
<input type="checkbox"/> Bir defadan fazla mı oldu (Kaç kez?)			
<input type="checkbox"/> Devam ediyor (Problem halen yaşanıyor)			
Problemi çözümlmek için ne öneriyorsunuz? (Gerekirse sayfanın arka kısmından devam edebilirsiniz)			
Bu kısım Proje Yönetimi tarafından doldurulacaktır.			
YORUM DURUMU			
Yorum Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Gerekli Tepki (E/H)	Müdahale tarihi:		
ŞİKAYETÇİ DURUMU			
Şikayet Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Cevap Gönderim Tarihi:	Şikayet kapatıldı (E/H):	Kapama tarihi ve imzası:	
İrtibat Numarası		0536 271 81 13	

APPENDIX F

Stakeholder Request and Grievance Register

Complaint Number	Create Date	Created By	Assigned to	Complaint Date	Current Complaint Status Open Closed Pending	Remaining Days	Due Date	Project Manager Region Country Wangchuk	Province	District	Quarter/Village	Stakeholder	Contact information - Phone	Contact information - e-mail	Contact information - Address	Gender Male Female	Stakeholder Categories SAPs Multipliers or other community representatives Project Workers Project Subcontractor Civil Society Governmental Institution Public Institutions Media	Block/Parcel	Relevant Stakeholders	Complaint Type	Category	Sub Category	Subject	Priority Low Medium High	Project Phase	Explanation	Project Section	Submission Type Letter Face to Face Phone CHMER Website/E-mail	Responsibility Karyan Energy Supervision Construction Contractor	Responsible Party/ Department Social Environmental JHR Construction	Measurements	Visibility	Action / Task 1 (Actions Taken to Resolve the Grievance)	Date of Action / Task 1	Status of Action / Task 1 Open Closed	Attached relevant grievance form	Attached a grievance resolution form	Attached photos if available			

APPENDIX G

Appeals Committee Application Form

**Doc. No:** KLYEN-G34BOR-SUS-SOC-PLN-0002**Date:** 11.07.2023**Rev. No/Date:** 01 / 11.07.2023

Kalyon Enerji
Uzlaş Komitesi Başvuru Formu

..... / / 20.....

Sayın İlgili,

..... İli, İlçesi,
..... köy/mahallesinde ikamet eden

..... olarak, Kalyon Enerji'ye ilettiğim
..... numaralı şikayetimin çözümü konusunda aşağıda belirttiğim sebeplerden dolayı
uzlaşma sağlayamadığımızı bildiri ve karşılıklı anlaşma ile çözüme yardımcı olunması için söz konusu şikayetin
tekrar değerlendirilmek üzere ilgili Uzlaş Komitesi'ne iletilmesini arz ve talep ederim.

Saygılarımla,

Uzlaşma sağlananama gerekçesi ve varsa çözüm önerisi:

.....

.....

.....

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.....

Şikayet SahibiEPC / Yüklenici TemsilcisiKalyon Enerji Sosyal Etki ve Kapsayıcılık Müdürü

Şikayet Sahibi İletişim Bilgileri	
Adı ve Soyadı:	
TC Kimlik Numarası:	
Telefonu:	
E-Posta Adresi:	
Adresi:	



wsp.com



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-ENV-PLN-0003

Soil Management and Erosion Control Plan

5 September 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	
01	Revisions as per the Client's comments	Whole Document
02	Revisions as per the Client's comments	Whole Document

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1 INTRODUCTION

This document is the Soil Management and Erosion Control Plan (SMECP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This SMECP sets out the requirements for management of environmental impacts, particularly with regard to the soil management and erosion control during implementation of the Project.

The Plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least 2 months before operation and updated at least 1 year before decommissioning.

The requirements set out in this SMECP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This SMECP applies to all Project activities under the Client's supervision, EPC, Sub-contractors- and to all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is to;

- define the scope and applicable interphases for the soil management and erosion control during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
SMECP	Soil Management and Erosion Control Plan
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP),
- International Conventions and Protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Pasture Law (No. 4342)
- Law on Protection of Soil and Land Use (No. 5403)
- Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources
- Regulation on Waste Management
- Regulation on Control of Excavation Soil, Construction and Demolition Wastes
- Regulation on Contaminant Release and Transportation Record

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 3 Resource Efficiency and Pollution Prevention, outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. In addition, this PS promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered

to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have soil management and erosion control implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

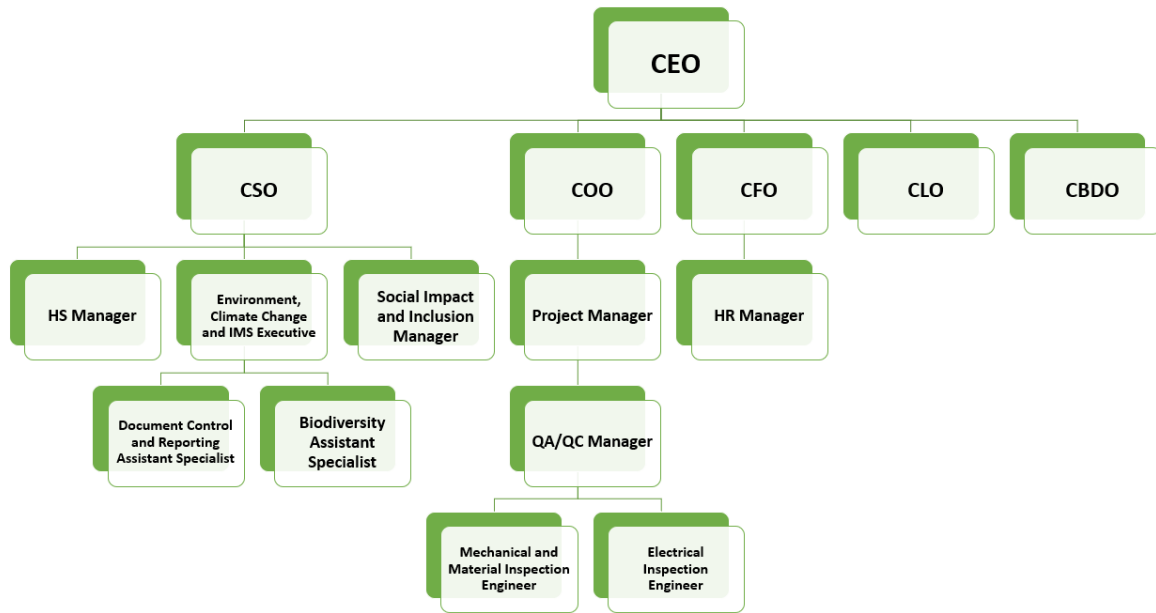


Figure 1: Organization Structure of the Kalyon Enerji

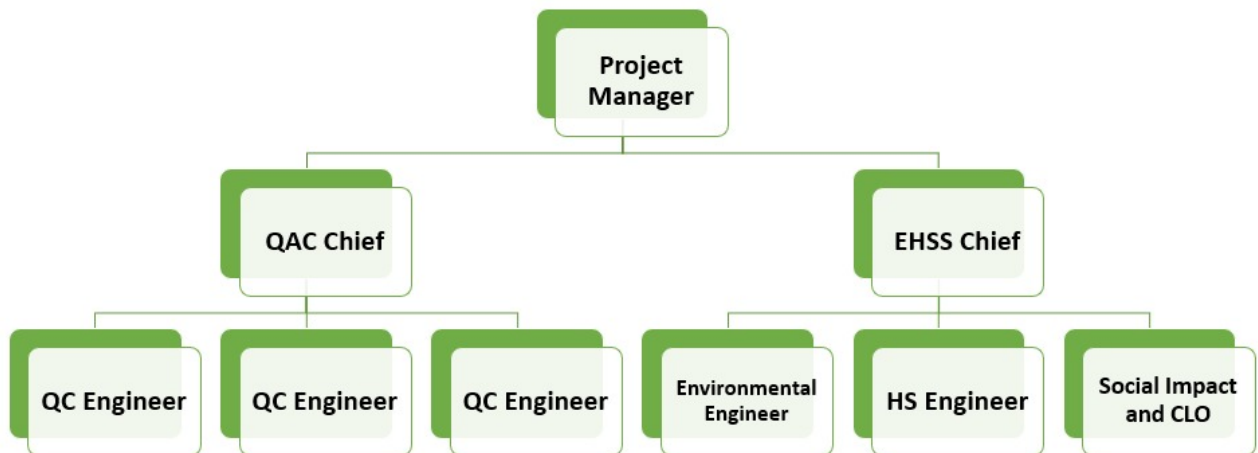


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements.
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractor
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Ensure Stakeholder Engagement and GRM are understood by all employees.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure this Plan is implemented according to the Project standards. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC -- Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions. Regulatory compliance related to recruitment, employment, and training.

Roles	Responsibilities
	<ul style="list-style-type: none"> Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this Plan for the personnel they are responsible for. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the HSSE Chief Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Support the effective implementation of this plan in the area of competence Perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence.

4 MANAGEMENT & MITIGATION REQUIREMENTS

4.1 Topsoil Management

Within the scope of the work to be done by the Kalyon Enerji, together with the rock removal process, the topsoil will be taken to an approved area. During the rock removal, stone and topsoil will be separated from each other and if necessary, they will be used in restoration works.

4.1.1 Topsoil Stripping

Maximization of the topsoil recovery during the land preparation and construction phase is essential to ensure that sufficient topsoil would be available for use in restoration works. Within this regard, following measures will be taken:

- Limits of clearing and construction areas will be clearly marked or fenced in order to avoid impacts outside this area.

- Vegetation covering the topsoil, can cause difficulty in the removal of specific topsoil depths and excessive quantities of vegetative matter in stockpiles may promote chemical and biological degradation of the seed reserves that will be the future source of natural regeneration during rehabilitation process. Therefore, prior to topsoil stripping process, vegetation will be removed or reduced by grazing and/or clearing.
- Prior to the vegetation clearance, weed control will be carried out to prevent the formation of invasive species during the revegetation.
- All cleared vegetative material will be buried in-pit, or if suitable, will be placed as habitat within the conservation areas.
- All machineries to be used in topsoil stripping will be cleared of weeds, plants, and diebacks stuck to them before the machineries brought to the Project area and between the operations, in order to prevent the introduction and spread of weeds, plants and diebacks.
- Dieback and weed infected soil will be sent to landfill in order to minimize the risk of spreading dieback and weed species across the Project area.
- The topsoil will be stripped separately from the subsoil while considering the depth and characteristics of the soil.
- The stripping and handling of topsoil will be carried out when the soil moisture content is optimum for the soil texture class.
- Topsoil stripping will not be conducted during windy and rainy periods. Construction is to be delayed 24 hours following a 24-hour rainfall of 10 mm or more during the preceding day, after which soil condition will be reassessed.
- Appropriate equipment will be used for the topsoil stripping activities. Surface grading of stockpiles will be performed with lightweight tracked vehicles or wheeled vehicles to prevent soil compaction.
- Vehicular traffic will be kept at minimum on the soils to be stripped, in order to prevent soil compaction.
- Topsoil will be stripped progressively in order to reduce erosion.

4.1.2 Topsoil Storage

During the storage of topsoil, following measures will be taken:

- Since long storage time of the stockpiled topsoil will lead to the loss of biological fraction, additional soil amelioration, such as seeding and fertilization, will be applied to maximize the recovery of topsoil to be used during the rehabilitation process. If the topsoil and stockpiles are stored for a long period of time (more than 1 years) the topsoil stockpiles shall be seeded with appropriate methods in order to avoid erosion from wind/rain to protect the organic matter content. The revegetation of stockpiles areas will be performed favoring fast growing and ground covering flora species able to minimize soil erosion. In such cases, proper species, and seed mixture ratios (fast growing, local plants) will be selected in consultation with the biodiversity specialists.
- The topsoil stockpiles shall not exceed 2 meters and the lateral slopes of the soil stockpiles shall not exceed 45 degrees.
- The surface of the stockpile will be lightly compacted, as necessary, to restrict rainfall penetration, maintain aerobic conditions, and will be protected from flooding by placing berms around the outside. Topsoil and subsoil piles will be free draining and gaps will be left in linear topsoil piles to permit access and prevent canalization of water that may be held against the stack.

- Area where the topsoil will be stored will have a maximum inclination of 5%.
- All stockpiles will be positioned away from drainage lines if applicable.
- Topsoil will be stored separately from subsoil at designated topsoil storage areas to preserve its vegetative properties.
- The stockpiles will be surrounded by temporary drainage lines or similar erosion control devices to prevent soil erosion.

4.1.3 Rehabilitation

Areas cleared during construction for temporary use will be restored, as soon as possible, with the goal of producing a stable vegetative cover to minimize erosion, dust and spreading of invasive alien species, and with the aim of re-establishing the original habitat with a positive impact on biodiversity.

During the rehabilitation of the Project area at the decommissioning phase, if topsoil will be stripped in any phase of the Project, the rehabilitation will include the use of topsoil recovered from the stockpiles, ground preparation such as ripping and scarification of the top surface and the planting of local native seeds. Some degree of soil amelioration such as addition of fertilizer and/or soil pH adjustment may also be required. Within this regard, following measures will also be applied:

- Topsoil will not be used as a fill material.
- Topsoil will be respread in even layers at a thickness appropriate for the landform and capability of the area to be rehabilitated.
- Areas where topsoil is spread will be ripped while trying not to bring subsurface materials to the surface (e.g. large rocks).
- Following the respreading, topsoil will be seeded to establish revegetation cover as early as possible.
- Rehabilitated areas will be controlled regarding to diseased plants and weed outbreaks, and significant weed outbreaks will be taken under control by using chemical or mechanical control methods.

Rehabilitation of the land will commence immediately on removal of each individual facility. The rehabilitation condition will be to a condition at least as good as that prevailing before establishment of the facilities, depending on the post construction land use. Disturbed areas will be rehabilitated to the satisfaction of the Client and written approval from the appropriate regulatory authority will be obtained. Photographs of the condition of the area prior to construction may be used for reference.

4.2 Erosion Control Measures

Erosion is the process under the impact of water flow or wind consist of soil detachment, transportation, and deposition of particles. Erosion control and sediment control are defined as any temporary or permanent steps used to reduce erosion and control sedimentation the process of settling or deposition of sediments due to motion through a fluid body. Proper erosion control along with sediment control reduce availability of particles for settling downstream.

Erosion control and sediment control during all phases of the Project should mainly aim for preventing any type of erosion, ensuring interception and drainage for surface runoff, ensuring surface runoff does not cause erosion or collect sediments from disturbed areas.

Topsoil stripping, earthworks and excavation activities can disturb and expose the soil surfaces at working areas which will be disposed to erosion due to rain and wind. Exposed working areas will be rehabilitated without delay to prevent soil erosion after completion of construction activities.

Measurements for erosion control and sediment management are provided below:

- Intercepting, diverting, conveying and discharging concentrated flows will be performed to prevent soil detachment and transport.
- To prevent off-site sediment movement, erosion control measures including drainage channels, settling structures, etc. will be implemented as needed prior to the start of construction operations.
- Wherever possible, land preparation and construction activities shall be re-scheduled during extreme weather conditions to avoid risk of erosion.
- High sediment generating activities will be avoided and, exposed surfaces and stored materials will be covered if necessary to reduce erosion of sediments into surface waters.
- Drainage channels will be established to prevent loss of soil and runoff to water bodies around the material storage areas.
- Water spraying against wind erosion will be implemented to prevent migration of sediments especially in dry seasons.
- Drainage from excavations will be collected and settled to remove suspended materials prior to discharge in accordance with required permits. Where practicable, local perimeter drains will be constructed around working areas to collect suspended run-off and direct it to a system of settlement basins before discharge in accordance with required permits.
- Channels, bunds and sandbag barriers will be provided on site to direct run-off to the collection system.
- All of the disturbed sites will be re-vegetated to the most possible extent in a timely manner following the completion of stripping and excavation works.

4.3 Soil Pollution

After completing topsoil stripping (if any), intense earthwork activities will commence. During these activities soil contamination may be seen due to accidental leakages/spillages and, poor waste and wastewater management. Within this regard following measures will be taken, in addition to the measures given in above sections:

- The amount of soil that could be subject to contamination/pollution and compaction will be minimized by ensuring the use of only the designated work sites and routes for the machinery, equipment and personnel.
- Related Personal Protective Equipment (PPE) will be provided to the personnel handling the excavation soil/waste.
- The fuel required for the machinery and equipment to be used within the Project, will be supplied in accordance with the Hazardous Material Management Plan and Traffic Management Plan.
- Provisions of the Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources, and Regulation on Contaminant Release and Transportation Record will be complied within the scope of the Project.
- In case of a spillage/leakage at the site, actions defined in the Emergency Preparedness and Response Plan will be taken immediately.
- After the containment of spillage/leakage, the contaminated soil will be stripped to the adequate depth and it will be stored and disposed in accordance with the Waste Management Plan.
- Wastes and wastewater to be generated within the scope of the Project, will be stored and disposed in a controlled manner in accordance with the Waste Management Plan and Pollution Prevention Plan.

Thus, it will not be possible for the wastes and wastewater to be generated in the Project area, interacting with the soil environment and cause any impacts.

5 TRAINING & AWARENESS

All employees including employees of -EPC and its sub-contractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method*	Responsibility	Frequency
SMECP-1	Invasive Species	Weed control will be conducted to prevent the formation of invasive species during the revegetation.	Kalyon Enerji	Once prior to the topsoil stripping Monthly on decommissioning phase
SMECP-2	Invasive Species	All machinery will be visually checked regarding to weeds, plants, and diebacks stuck to them.	EPC and its sub-contractor	Once before machinery brought to the Project Area Between the operations
SMECP-3	Soil Management	Amount of subsoil stored/transferred for disposal will be recorded	EPC and its sub-contractor	Following the subsoil removal and disposal process
SMECP-4	Erosion Control	Erosion control measures will be visually checked.	EPC and its sub-contractor	Monthly

ID	Topic	Method*	Responsibility	Frequency
SMECP-5	Soil Pollution	Soil quality analyses will be conducted at the areas where any spillage/leakage occurs, for the suitable parameter sets corresponding the spilled/leaked material defined in the Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources	EPC and its sub-contractor	In case of any spillage/leakage occurs
SMECP-6	Training	Employee training	EPC and its sub-contractor	Before commencing relevant work at site
SMECP-7	Grievance	Grievances received regarding soil management	EPC and its sub-contractor	Continuously
SMECP-8	Records	Statistical trend of spillage/leakages resulted in soil contamination	EPC and its sub-contractor	Monthly

* Limit values for each parameter are given in ESIA Appendix-B

All monitoring results will be compared with baseline measurements conducted in the scope of ESIA studies. Measurements will be conducted by laboratories which are authorized by the Ministry of Environment, Urbanization and Climate Change. Additional monitoring will be conducted in case of grievances.

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the soil management and erosion control practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Frequency/	Responsibility	Target
SMECP-KPI-1	Number of spillage/leakages resulted in soil contamination	Monthly	Kalyon Enerji/ EPC/ Subcontractors	Zero per year
SMECP-KPI-2	Inspections completed vs. planned	Monthly	Kalyon Enerji/ Contractors/ Subcontractors	100%
SMECP-KPI-3	Soil management and erosion control related trainings completed vs. planned	Monthly	Kalyon Enerji/ Contractors/ Subcontractors	100%
SMECP-KPI-4	Total % of non-conformities related to soil management and erosion control closed within the agreed timeframe	Monthly	Kalyon Enerji/ Contractors/ Subcontractors	100%
SMECP-KPI-5	Total % of grievances related to soil management and erosion control closed within the agreed timeframe	Monthly	Kalyon Enerji/ Contractors/ Subcontractors	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This Plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-GEN-PLN-0003

Supplier Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Supplier Management Plan (SMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This SMP sets out the framework for supply chain management which includes measures for the management of the risks (e.g., financial effects due to changes in availability, sourcing, and quality of water, and food security; effects on organization's premises, operations, supply chain, transport needs, and employee safety) associated with the Supply Chains and to increase the Project's local content by maximizing the local procurement for businesses and make sure that there is non-discriminatory, transparent, open to all and fair recruitment process during the Project.

The Plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two (2) months before the operation and updated at least one (1) year prior to decommissioning.

The requirements set out in this SMP are applied to all activities throughout the lifecycle of the Project, including those carried out by EPC and its sub-contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This SMP applies to all Project activities under the Client's supervision, EPC and its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractors will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is to;

- define the scope and applicable interphases for the management of supply chain during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,

- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPs	Equator Principles
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Nongovernmental Organization
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
SMP	Supplier Management Plan
TEİAŞ	Turkish Electricity Transmission Corporation

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP),
- International conventions and Protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

There is not any national standard or regulation that addresses supply chain management. Standards related to procurement are described in Public Tender Act (Law No: 4734 Official Gaz. No. 24648, 22/01/2002).

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 2 Labor and Working Conditions states that where there is a high risk of child labour or forced labour in the primary supply chain, the client will identify those risks. If child labour or forced labour cases are identified, the client will take appropriate steps to remedy them. The client will monitor its primary supply chain on an ongoing basis in order to identify any significant changes in its supply chain and if new risks or incidents of child and/or forced labour are identified, the client will take appropriate steps to remedy them.

Additionally, where there is a high risk of significant safety issues related to supply chain workers, the client will introduce procedures and mitigation measures to ensure that primary suppliers within the supply chain are

taking steps to prevent or to correct life-threatening situations.

The ability of the client to fully address these risks will depend upon the client's level of management control or influence over its primary suppliers. Where remedy is not possible, the client will shift the project's primary supply chain over time to suppliers that can demonstrate that they are complying with this PS.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have supply chain management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)
- Suppliers & Vendors EHSS Specification and its appendices

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

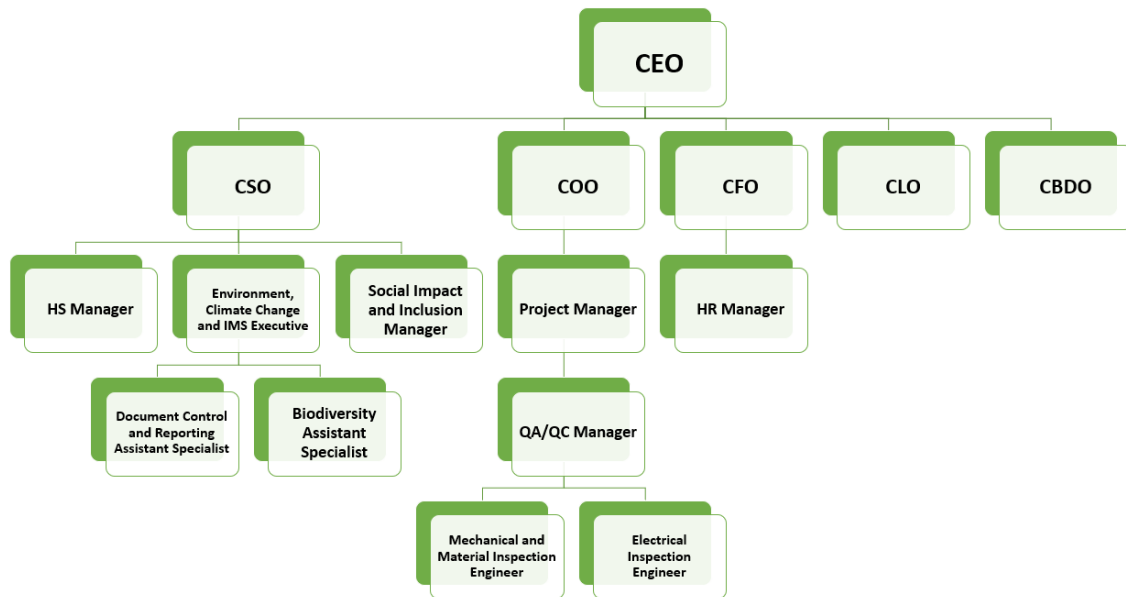


Figure 1: Organization Structure of the Kalyon Enerji

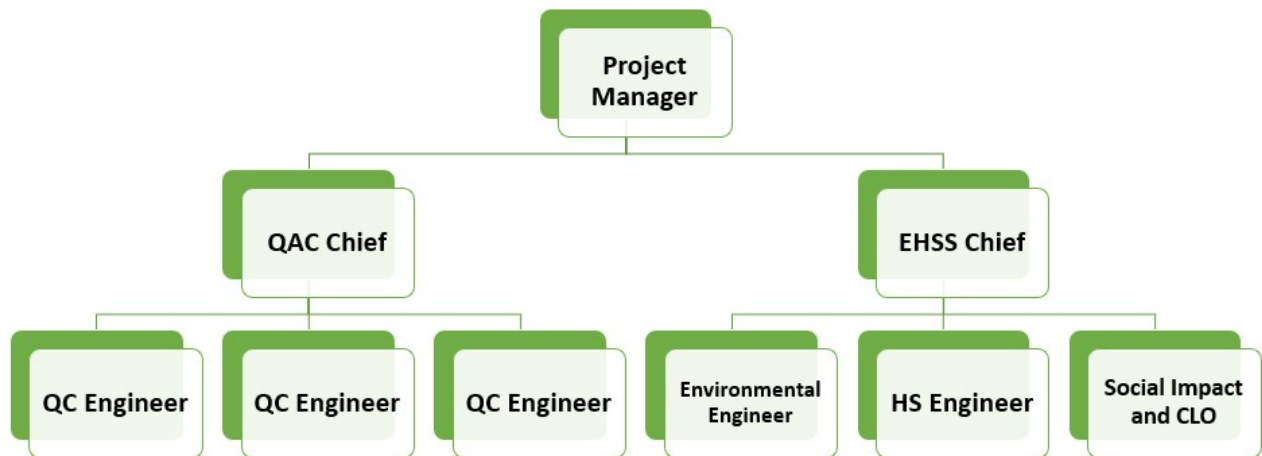


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements.

Roles	Responsibilities
	<ul style="list-style-type: none"> Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> Prepare, manage, improve, monitor, and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and task are trained on this Plan. Conduct/organize periodic audits. Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>Purchasing Specialist</i>	<ul style="list-style-type: none"> Ensure that the supplier & vendor evaluation process is followed effectively according to this Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC - Personnel Affairs Chief</i>	<ul style="list-style-type: none"> Maintain HR records. Process HR transactions.

Roles	Responsibilities
	<ul style="list-style-type: none"> Regulatory compliance related to recruitment, employment, and training. Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. Organize the trainings related to this Plan for the personnel they are responsible for. Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the HSSE Chief. Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions, and safety considerations.
<i>Sub- contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related trainings. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the trainings. Ensure compliance with measures defined in this Plan.
<i>Suppliers&Vendors</i>	<ul style="list-style-type: none"> All suppliers&vendors will have the responsibility to ensure the Kalyon Enerji's quality standards are achieved. This may include quality inspections by Kalyon Enerji, if deemed necessary.

4 MANAGEMENT & MITIGATION REQUIREMENTS

The key stages of the supply chain management process that will be applied by Kalyon Enerji are as follows.

Purchase Requisition

All requests for goods and services will be performed on a purchase request for requisition. The purchase request for requisition includes the followings:

- Determines the person and departments requesting the goods or service.
- Specifies the requirements (Description, quantity, quality parameters, packing, service, and delivery schedule).
- Specifies the EHSS requirements.
- Indicates the cost center to be charged.
- Indicates the activity center to be charged.

- Indicates the estimated value, budget value where appropriate.
- Suggests possible sources of supply.
- As soon as it is approved by related authority such as department manager, it is being sent to Purchasing Specialist to start procurement process.

Purchasing Process

During the procurement process, after approval from Purchasing specialist shall apply the following rules:

- Review the detail for clarity and completeness of purchase request for requisition. In case of lack of required information, contact with the originator and obtain necessary information.
- Contacting approved suppliers/subcontractors and requesting quotes.
- Negotiate terms, conditions, pricing, delivery schedules according to site delivery criteria.
- Make cost analysis and benchmarking.
- Prepare purchase order and send to suppliers/subcontractors. A complete purchase order should include:
 - Description, quantity and specifications of the goods or services
 - Delivery schedule of procurement
 - Agreed unit and total price and currency
 - Applicable law, regulations, and taxes
 - Delivery and shipment instructions
 - Invoicing and mailing instructions
 - Payment terms
 - General and specific terms and conditions
- It is required to obtain minimum 3 offers from different suppliers as a standard application wherever it is possible. However, due to the nature of the business it may not be possible at all times. Exceptions to 3 offers may be applied in the following cases, in that case, sole source justification form to be developed by Kalyon Enerji shall be filled and approved.
 - Repair of equipment or component
 - Urgent purchases
 - Preferred supplier (if defined by purchasing for a specific item group)
 - Local purchase
 - Purchases referenced to a contract

Selection of Suppliers

A process for selection of suppliers will be implemented.

The process will identify potential risks and evaluate the supplier's existing EHSS and labor management practices in relation to the Project Standards, including the supplier's capacity to perform the required work and materials/services in accordance with the stipulated standards. The following items are taken into consideration while selecting suppliers:

- Industry References
- Total Price
- Specifications
- Packing Standards
- EHSS compatibility
- Social compliance

- Labour conditions
 - Quality
 - Capital Cost
 - Spare Parts Cost
 - Operational Cost
 - Delivery Schedule
 - Service Capability
 - Technical Acceptability
 - Regional Industrial Benefits
 - Financial Requirements
- Only those suppliers who can guarantee that the selection criteria are met will be chosen.
 - To ensure that all suppliers will make every effort to eliminate all forms of bribery, fraud, and corruption.
 - To ensure not to take advantage of any family, social or political connections to gain advantage within business dealings.
 - To ensure that suppliers will not disclose any confidential information of the Kalyon Enerji.
 - When there is a high risk of child labour or forced labour in the primary supply chain, those risks will be identified. Particular attention will be paid to supplier from countries where there is a risk of child labour. If cases of child labour or forced labour are identified, appropriate steps to remedy them will have to be taken to address them. The primary supply chain will be monitored consistently in order to identify any significant changes. If new risks or incidents related to child and/or forced labour are identified, appropriate remedy steps will be taken to address them.
 - When significant safety concerns are identified among the workers in the primary supply chain, procedures and mitigation measures will be introduced by Kalyon Enerji to ensure that relevant suppliers are taking steps to prevent these situations.
 - Where: (i) the project uses external suppliers of living natural resources over which Kalyon Enerji has no direct control of management; (ii) these resources are fundamental to the core functions of the project; and (iii) suppliers can potentially have a significant impact on the ecosystems and biodiversity they preserve, Kalyon Enerji will adopt and implement a sustainable resources procurement policy, management procedures and verification system to evaluate its primary suppliers.

Logistics and Warehouse

Purchasing Specialist obtains approved Procurement Order. According to delivery schedule and terms of Procurement Order, Purchasing Specialist gets in contact with supplier concerning delivery schedule and other logistics details such as packing, custom clearance, etc.

Logistics processes have been performed based on the following criteria:

- Based on HS code of material, all permits and required regulations are investigated and applied during transportation.
- Risk Analysis are performed for heavy equipment and needed chemicals. Based on that risk analysis level, extra actions may be required.
- Packing must be suitable for each product in order to protect the products. Also, if the goods are any chemical, then packing standards shall be appropriate so as not to harm environment.
- Logistics work in coordination with Warehouse Chief and related Department until the delivery is completed properly to the stated location at the mine site. Especially, for heavy equipment, delivery is

performed to the location defined by Project Department. Apart from the heavy equipment, all other deliveries are being performed to Warehouse Chief.

- Escorts vehicles are used in case of any high risk of environment or for safety of other vehicles on the highway.
- During receiving, physical checks are performed by Warehouse Chief and related department. For heavy equipment, project manager performs final acceptance. All storable items final acceptance stage is completed by warehouse chief.

Local Procurement

- The overall objective is to employ the reserve workforce from local areas. This objective can be achieved by the implementation of this plan in order to respond community concerns, understand what work skills are available locally and increase local employment opportunities. The Project will generate temporary/permanent employment opportunities linked to:
 - The construction, operation, and decommissioning activities
 - The procurement of goods, materials, and services
- Employment opportunities will be direct in the case of workers employed by Kalyon Enerji and contractors and subcontractors for Project activities and indirect, in the case of workers employed for providing the materials, goods and services needed for the Project.
- Employment levels are categorized according to the following definitions:
 - Skilled positions: work that requires high skill level, usually obtained from higher education or from extensive experience. Tasks include taking decisions and assuming responsibility for other workers.
 - Semi-skilled positions: work that requires basic education and experience. Tasks are usually of routine type and do not include major responsibilities.
 - Unskilled positions: work that requires no specific education or experience and that can be adequately performed by a broad segment of the work force.
- It is expected that most skilled positions will be filled at a national and international level.
- Local workers are expected to be suitable to fill unskilled or semiskilled positions linked to the provision of ancillary services at Camp Site and Construction/Facility Site (e.g., food and catering, laundry and cleaning services, transport, security).
- Priority will be given, to the extent feasible, to the recruitment of local workforce, in order to maximize local socioeconomic benefits.
- In case qualified personnel is required to be recruited:
 - Kalyon Enerji will give priority to employ local residents, defined as those living in the local areas.
 - If the required competency cannot be found among local residents, Kalyon Enerji will employ workers from other areas.
- Kalyon Enerji will make an assessment in order to understand what work skills are available locally and what actions should be implemented to increase local employment opportunities.
- Kalyon Enerji will promote local employment by providing information on the employment opportunities, on the recruitment process and on the official application channels through different local media including such as internet, advertisements on local newspapers, local authorities, agencies, associations and NGOs.

- Kalyon Enerji will promote procurement from local businesses, by providing information on procurement opportunities, services needed and qualification process through different channels including such as internet, advertisements on local media, local authorities, Chambers of Commerce and Trade Associations.

Supplier Performance Evaluation

- A separate procedure on Supplier Performance Evaluation will be implemented once a year in the Project to assess the performance of each supplier of Kalyon Enerji. The assessment will allow Kalyon Enerji to decide to continue working with the same supplier; consideration of alternatives or stop working and obligatory to find a new alternative. The following aspects will be considered in the Supplier Performance Evaluation:
 - Timely completion of works
 - Compliance with service agreement
 - The level of communication
 - Compliance with H&S and environmental legislation and site rules
 - Number of incidents
 - Risks of the supplier in terms of procurement

5 TRAINING & AWARENESS

All employees including employees of contractors and subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
SMP-1	Implementation of Suppliers Selection Process	The process for selection of suppliers (for the details please refer to Section 4)	Kalyon Enerji/ EPC and its sub-contractor	Continuously

ID	Topic	Method	Responsibility	Frequency
SMP-2	Local Procurement	Monitoring the purchase records considering percentages values of local procurement.	Kalyon Enerji/ EPC and its sub-contractor	Quarterly
SMP-3	Supplier Performance Evaluation	Conduct regular supplier performance evaluation	Kalyon Enerji/ EPC and its sub-contractor	Once a year
SMP-4	Grievance	Grievances received regarding hazardous material management	Kalyon Enerji/ EPC and its sub-contractor	Continuously
SMP-5	Training	Supplier training	Kalyon Enerji/ EPC and its sub-contractor	Before starting work As required
SMP-6	Contracts to Local Businesses	Statistical trend of average number and % of local businesses contracted each year compared to previous year	Kalyon Enerji/ EPC and its sub-contractor	Quarterly

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the supplier management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
SMP-KPI-1	Total % of non-conformities closed within the agreed timeframe	Kalyon Enerji/ EPC/ Sub-contractors	Monthly	100%
SMP-KPI-2	Total % of grievances closed within the agreed timeframe	Kalyon Enerji/ EPC/ Sub-contractors	Monthly	100%
SMP-KPI-3	Trainings completed vs. planned	Kalyon Enerji/ EPC/ Sub-contractors	Annually	100%
SMP-KPI-4	Supplier performance evaluation conducted vs. planned	Kalyon Enerji/ EPC/ Sub-contractors	Annually	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This Plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

Company Doc. No: KLYEN-G34ANT-SUS-OHS-PLN-0003

Traffic Management Plan

29 August 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	
01	Revisions as per the Client's comments	Whole Document
02	Revisions as per the Client's comments	Whole Document

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1 INTRODUCTION

This document is the Traffic Management Plan (TMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project ("the Project"). This TMP sets out the requirements for the management of environmental, community and occupational health and safety particularly concerning traffic management during the implementation of the Project.

The Plan applies to the construction, operation, and decommissioning phases of the Project. It will be reviewed at least two months before the operation and updated at least one year before decommissioning.

The requirements set out in this TMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)'s Common Approaches.

1.1. Scope

This TMP applies to all Project activities under the Client's supervision, EPC, its sub-contractors and all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractor will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed under Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on the findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is to;

- define the scope and applicable interphases for the management of traffic during all project activities,
- define project traffic-based standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators.

- define the project-specific traffic risks and hazards.

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPs	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principle Financial Institution
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Electronic Stability Program
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
IFC	International Finance Corporation
IVMS	In-Vehicle Monitoring System
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
RRA	Road Risk Assessment
TEİAŞ	Turkish Electricity Transmission Corporation
TMP	Traffic Management Plan

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP)
- International conventions and protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Highway Traffic Law No. 2918
- Highway Traffic Regulation
- Regulation on Traffic Signs
- Regulation on Control of Exhaust Gas Emission
- Type Approval Regulation on Exterior Noise Emissions and Exhaust Systems of Motor Vehicles
- Regulation on the Transportation of Dangerous Materials by Road
- Occupational Health and Safety Law No. 6331

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities)

and, where appropriate, other stakeholders.

IFC PS 4 Community Health, Safety, and Security recognize that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this PS addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project-related activities, with particular attention to vulnerable groups.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have traffic management implications, including:

- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Waste Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0004)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)
- Labour Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATIONAL STRUCTURE

3.1 Project Implementation Organization Chart

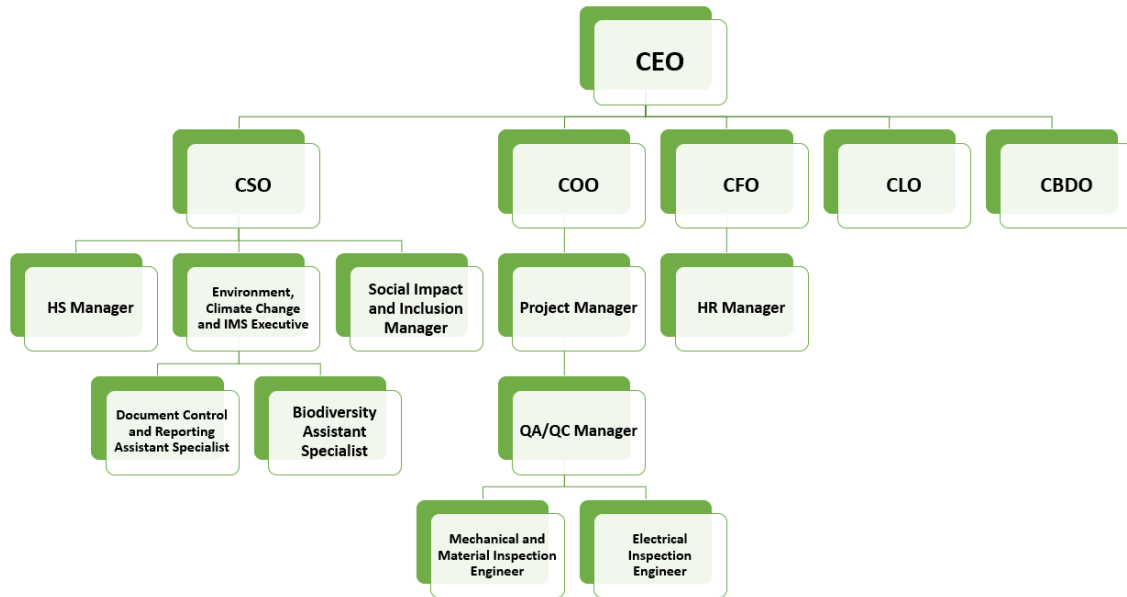


Figure 1: Organization Structure of the Kalyon Enerji

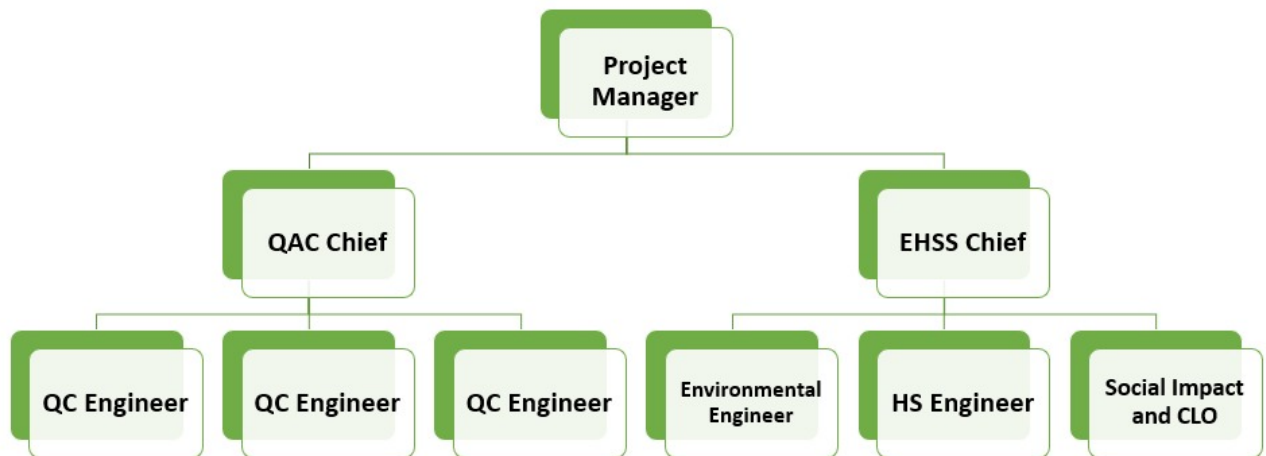


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organisational structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> • Approval of this Plan. • Ensure adequate resources are provided with respect to sustainability requirements. • Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> • Ensures implementation of this Plan at the Project level. • Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> • Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. • Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Sustainability Department</i>	<ul style="list-style-type: none"> • Prepare, manage, improve, monitor, and update this Plan. • Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. • Ensure the execution of the outsourced (contracted) activities in their responsibility areas under this plan and depending on plans/procedures. • Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. • Conduct/organize periodic audits. • Ensure health and safety practices are implemented, by workers, EPC, and its sub-contractor. • Ensure Stakeholder Engagement and GRM are understood by all employees. • Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> • Ensure adequate resources are provided for implementation of this Plan. • Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. • Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> • Ensure this plan is implemented according to the Project standards. • Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. • Ensure all relevant topics followed are reported to Kalyon Enerji • Obtain data from sub-contractors regarding activities defined in this Plan. • Organize trainings related to this Plan. • Conduct periodic internal audits. • Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). • Conduct periodical site visits/audits. • Ensure site activities are implemented according to applicable H&S requirements. • Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. • Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC Personnel Affairs Chief</i>	<ul style="list-style-type: none"> • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment and training.

Roles	Responsibilities
	<ul style="list-style-type: none"> Report to government and other bodies on compliance with commitments and other occasions as required by legislation. Organize the training related to this procedure for the personnel who are responsible for this Plan. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> Control incoming and outgoing traffic at all times. Report all security issues to the Camp Manager Involve in the investigation team for the investigation of the security incidents. Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. Ensure all mitigation measures and management controls are implemented properly. Ensure that only properly trained and qualified security personnel are employed. Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.
<i>Sub-contractors</i>	<ul style="list-style-type: none"> Develop its own procedure to fully implement this Plan. Ensure compliance with Project standards and contractual agreements. Ensure related non-compliances are recorded and responded to immediately. Conduct internal audits and record identified incompliances. Provide related training. Appoint a responsible person for activities defined in this Plan. Provide staff, equipment, and material for the implementation of measures defined in this Plan. Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> Participate in the training. Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> Support to effective implementation of this plan. Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. Take action on complaints concerning the area of competence. Supports the resolution of complaints related to the area of competence

4 MANAGEMENT & MITIGATION REQUIREMENTS

The following points will be considered as a minimum during all phases of the Project regarding traffic management:

- A continuous stakeholder engagement process and grievance mechanism will be in place:
 - to exchange information on the Project with the local community and other stakeholders; and
 - to record and respond to any complaints and concerns raised by the local community members and other stakeholders.
- Consideration will be given to traffic volumes during the rush hours of the day and delivery of equipment and materials will be utilized at quieter periods to avoid increased congestion on the roads used by the

nearby communities.

- In case of any damage on the roads resulting from the Project activities, necessary maintenance works will be undertaken by the Client.
- Road Risk Assessment (RRA) will be conducted including a route survey to clarify the transportation route of the equipment/material before transportation. Based on that, sensitive receptors such as local population, schools, mosques, cultural heritage sites etc. will be considered and consultation with the local authorities will be conducted during the selection of transportation routes. Drivers' compliance with authorized routes will be monitored continuously as well.
- The project area will be equipped with suitable and sufficient lighting to ensure sufficient visibility of operators.
- The routes to be used by pedestrians will be segregated from heavy vehicle routes.
- The speed limits will be implemented. Operators/Drivers shall obey the speed limits within the Project area and roads to be used. An In Vehicle Monitoring System (IVMS) will be installed for light vehicles. Vehicle speeds will be monitored randomly through speed gun tools. The disciplinary action procedure will be established and implemented for the operators/drivers who are breaching the speed limits and traffic rules.
- Seatbelts will be worn in vehicles including for the ones who will sit on the backseats and machinery when being operated.
- No vehicle/equipment/material will be allowed to enter to Project area before obtaining approval from security.
- Changes in the conditions of the roads will be monitored regularly and necessary road correction remediation actions will be taken where necessary.
- In severe weather conditions, the EHSS Engineer will evaluate the road conditions and then decide whether it is safe for driving or not.
- All vehicles will use winter tires between November 1st and April 1st.
- Loading and unloading areas will be designed appropriately to prevent/minimize vehicle/pedestrian contact.
- Fatigue and distraction procedures will be established considering the local legal requirements and the nature of the work.
- Project disclosure activities will include informing communities about the project traffic management controls and grievance mechanism. Collaboration with local communities and responsible authorities will be ensured to improve signage, visibility, and road safety conditions, especially near the roads and other locations where children may be present.
- Appropriate traffic signs/labels, signals, lights, and markings will be placed in the required areas to prevent potential accidents/incidents. Barriers will be placed in the required areas to protect both humans and assets.

4.1 Transportation to the Project Area

The Project area can be accessed from Gaziantep Ring Road by connecting to Şahinbey district existing Ozanlı Village roads, and no new access road is planned (see Figure 3).

There will not be any heavy-load transportation that goes beyond standard road transportation limitations; therefore, no road improvement is expected to be required for transportation for the existing roads. Internal access roads will be designed and constructed inside the Project area.



Figure 3: Project Layout

4.2 Vehicle Maintenance and Inspection

All vehicles will be subjected to periodic maintenance and inspections.

4.2.1 Period or Distance Based Maintenance

Vehicle maintenance, at a minimum, will be carried out in compliance with the vehicle manufacturer's recommended specifications and standards.

Maintenance intervals will be time-based, with the interval between safety checks depending on:

- Type of vehicle,
- Type of operation,
- Distance covered/fuel used.

Additional maintenance of the whole vehicle may be needed outside the scheduled program, for operational reasons:

- If the vehicle is to be used for harder work than normal or if greater distances are to be covered,
- If the vehicle is to be sent to any place where inspection may be difficult or impractical for some time.

Maintenance shall be carried out by, or directly supervised by, trained and qualified vehicle mechanics.

4.2.2 Equipment / Vehicle Maintenance Areas

The number of equipment/vehicle maintenance areas will be limited to maintenance areas within the main construction campsites and licensed maintenance facilities. Please refer to Pollution Prevention for details.

Maintenance areas will include the following features:

- Impermeable surfaces (e.g., concrete, pavement) will be established to prevent possible contamination resulting from maintenance activities.
- Grease traps will be established for the segregation of oil and grease-containing wastewater before discharging it to the wastewater treatment plant.
- The area will be roofed and sized appropriately to the size and nature of the fleet to be maintained.
- Appropriate access pits or vehicle ramps will be provided.
- Tools and equipment appropriate to the size and nature of the fleet to be maintained will be provided.
- A safe working environment will be established with hazards identified and managed appropriately.

Under no circumstances, maintenance activities will be carried out in the open air, on open ground, or under a shade tree. Only emergency repairs are permitted to be carried out at the roadside or in the open using drip pans.

If practical, stationary equipment will be placed in secondary containment or will have a drip pan placed under the equipment before commencing any maintenance. Spill kits will be kept readily available in areas identified to have spill risk.

Filters or materials saturated with petroleum products will be drained into an appropriate container to remove any free product before disposal. Hazardous materials, petroleum products, and used drained filters will be properly stored in containers that are clearly marked with the lids securely attached. Containers will be stored only in designated storage areas. Disposal of contaminated wastes will be carried out as per Waste Management

Plan. Proper type fire extinguishers shall be in place while doing maintenance.

Equipment washing facilities will be securely constructed, using a recirculatory system with no overflow and the effluent will be contained for proper treatment and disposal.

Maintenance will only be conducted by personnel that have proper spill response training.

4.2.3 Inspections

There are three types of inspections:

- First Use (Premobilization) Inspection: Performed by trained maintenance staff.
- Daily Check: Performed by the driver/operator.
- Safety Inspection (time or km run based): Performed by trained vehicle maintenance staff.

First Use Inspections

First-use inspections will be carried out before using new, pre-used, hired, leased or borrowed vehicles.

A first-use inspection, often called a premobilization inspection combines a normal safety inspection and a check that the vehicle meets the original contract or purchase order specifications.

Daily Checks

Daily checks will be carried out before using the vehicle by the driver/operator or other authorized person e.g., mechanic or inspection team.

The specimen "Daily Vehicle/Equipment Checklist" lists the daily check items which include GIIP measures such as IVMS (In Vehicle Monitoring System) and front view camera, ABS brakes (and Electronic Stability Program ESP, where possible) (see Appendix A for further details).

Other non-safety-related items may be added to this check, but preferably as a separate list so that drivers and supervisors understand which are the critical safety elements.

There shall be a system of reporting faults that may affect the roadworthiness of the vehicle, which shall include:

- Reporting all faults every day until they are fixed,
- A method of recording, in writing, the faults reported,
- A method of determining whether, and how, any vehicles with faults may be used, and by whom,
- A method of closing out reported faults in the same place as they are originally recorded.

Any defects found during the daily check, whilst the vehicle is in use, or on its return to base, shall be reported by the driver/operator to the maintenance manager. The defects shall be recorded in writing.

The maintenance manager shall ensure that corrective action is taken for the issues reported in the defect report.

A defect report is part of the maintenance record of the vehicle and must be kept, together with details of the remedial action taken, for at least 12 months.

Timely or Distance Based Safety Inspections

The safety inspection may be a part of the overall maintenance plan or schedule, but the safety inspection must remain independent and take place before or after repairs and routine maintenance.

Safety inspection intervals shall be time-based, with the interval between safety checks depending on the;

- Type of vehicle,
- Type of operation,
- Distance covered/fuel used.

It is recommended that safety inspection stickers are displayed inside each vehicle showing when the next safety inspection is due.

Additional safety inspection on all or part of the vehicle shall be considered if:

- A harsh operating environment would cause excessive wear to certain components,
- If the inspector considers the type of operation to cause excessive wear to certain components.

Additional safety inspections of the whole vehicle may be needed outside the scheduled program, for operational reasons:

- If the vehicle is to be used for harder work than normal or if greater distances are to be covered, and
- If the vehicle is to be sent to any place where inspection may be difficult or impractical for some time.

Safety Inspection Reports

Each safety inspection will be recorded in writing.

The safety inspection report form (see Appendix B) shall include:

- Date of inspection,
- Name of the inspector,
- Vehicle identity (fleet number and/or registration number),
- Odometer reading,
- A list of all items inspected,
- An indication of the condition of each item inspected,
- Details of any defects found,
- Details of any repair work and by whom it was done,
- A closing statement that any defects have been repaired successfully, and the vehicle passes the inspection.

The safety inspection report form shall have notes of repair work done to remedy defects identified and details of any work to be carried forward.

Safety inspection report forms shall be kept for at least 12 months as part of the maintenance history of the vehicle. Safety inspection records may be stored electronically.

A certificate or sticker shall be issued to vehicles, which pass the safety inspection, to be attached or kept in the vehicle until the following inspection. This evidence shall include, as a minimum: the date of the last inspection, the name of the inspector, and the name or logo of the inspecting party.

4.3 Driving Safety

4.3.1 General Rules

- All drivers will take defensive, off-road driving, and fatigue management training.
- All vehicle occupants will always be in a driver or passenger seat and will wear a seatbelt.
- The driver will not put the vehicle into motion until all occupants have fastened their seatbelts.
- Drivers will wear suitable sturdy footwear whilst driving. ("Flip flops" are not permitted).
- Heavy goods vehicle drivers will wear safety shoes whilst on duty.
- Drivers will remove ignition keys from the vehicle when it is not in use.
- Drivers will not use cell phones including "hands-free" units while driving. It is also strongly recommended that drivers stop their vehicles in a safe position when receiving or making radio calls.
- Safety devices (including speed limiters and safety belts) will not be tampered with. Appropriate disciplinary action will be taken against those who do so.
- Drivers will be well-rested, medically fit, and not under the influence of alcohol or drugs, including those prescription medicines which can cause drowsiness.
- Drivers will carry out pre-trip checks on their vehicles before driving.
- It is not permitted to carry loose items in the passenger cabins of a vehicle.
- Speed limits will be enforced for construction traffic and posted along the internal and external access roads (maximum 50 km/hr. at the settlement areas, reduced to 20 km/hr. at the construction site).
- In case of a traffic accident, the Emergency Preparedness and Response Plan will be followed.
- All vehicles/machines shall keep their headlights and lights on while driving and in use.

4.3.2 Driving Hours and Rest Periods

- Light vehicle, heavy vehicle and shuttle drivers will take a minimum of 45 minutes rest after 4.5 hours of continuous driving.
- Drivers will not work more than a 12-hour shift period. The shift period will include loading, unloading, any other work, compulsory rest time, waiting and driving time.
- Drivers will drive a maximum of 9 hours.
- Drivers will take a minimum of 8 hours of uninterrupted off-duty rest between shifts.
- Drivers experiencing tiredness or fatigue, when driving, will take additional rest as required.
- Rest will not be taken on the ground underneath a vehicle or its trailer. Rest compartments that are slung under trailers will be acceptable. Overnight rest during a journey will not be taken within the vehicle cab unless it is a sleeper cab but in motel-type accommodation or the case of oilfield trucks on rig moves/convoys in the open camping-type arrangements.

4.3.3 Driving on Graded Roads

When driving on graded roads, drivers will:

- drive with dipped headlights on at all times.
- not take “shortcuts” off-road, or drive on unauthorized or closed graded roads.
- adhere to the routes as authorized.

4.3.4 The Dust Code

When a vehicle travelling in the same direction is creating a dust cloud that makes it difficult to see the road ahead, drivers:

- will slow down,
- will keep a safe distance from the edge of the dust cloud, far enough back to be able to stop in the distance that can be seen to be clear,
- will not enter the dust cloud,
- will never overtake in the dust.

When a vehicle travelling in the opposite direction is creating a dust cloud that makes it difficult to see the road ahead, drivers:

- will slow down,
- will keep moving slowly or stop completely, if necessary, before entering the dust cloud,
- will stop immediately if they become disoriented.

4.3.5 Reversing

A high proportion of traffic accidents result in persons injured or trapped by reversing vehicles. The following measures will be taken to mitigate the risks arising from reversing vehicles:

- Before reversing, drivers of long vehicles will ensure that banksman or spotters are available to ensure safe reversing.
- Where necessary, reverse alarms will be installed on large/long vehicles and work machines.
- All vehicles' parking will be performed in reverse into their parking spaces. Owners of personal vehicles, contractors and visitors are expected to comply with safe reversing plans.

4.3.6 Project Area Traffic Control

Access to the Project area must be controlled to ensure that unauthorized persons cannot progress to a location where they may be at risk from the site operations. This could be in the form of signage or personnel-controlled areas such as security.

Careful consideration must be given to contractors and visiting drivers who are required to access the Project area such as maintenance personnel, delivery drivers, operators, and visitors. Their needs will be assessed and where applicable these persons will be inducted accordingly to ensure that they are aware of the rules and procedures and what is expected of them. For example, small vehicles that are invariably required to attend breakdowns in construction areas, their access will be strictly controlled with escort vehicles and close supervision. Consideration will be given to issuing the visiting drivers with a plan so that their movements and operations are strictly controlled.

4.3.7 Pedestrian / Vehicle Segregation

The Project area shall be designated in such a way that pedestrians and vehicles can circulate safely. To minimize adverse effects from vehicles to pedestrians, the Client will apply specific speed limits within the Project area. Speed limit signs will be erected on all access routes and site entrances.

There will be pedestrian traffic; employees, contractors, and visitors either on their way to or from their normal place of work at the beginning or end of the working day or as part of their work during the day. Traffic routes will be planned to give the safest route to vehicles and pedestrians where construction activities take place. Pedestrian routes will be planned to minimize the exposure of pedestrians to vehicle movements by the installation of barriers, crossing points etc.

All personnel will use only designated walking paths and roadways, on the left side of the road facing on-coming traffic, when entering or leaving the job site, when moving from one area to another, or when obtaining material. The use of shortcuts or undesignated pathways is prohibited. All these routes will be adequately marked for that purpose. Pedestrians will have the right of way over motorized traffic.

In the event of standard access routes being temporarily unavailable, Security and EHSS department will identify alternative routes and ensure that temporary signs are posted, or a traffic guide is in attendance.

Security will also be responsible for ensuring that visitor and delivery vehicle drivers are made aware of site traffic rules, restrictions, and safety considerations. Pedestrian visitors will be met by a sponsor and accompanied whilst on site.

4.3.8 Road Traffic

Wherever practical, a schedule will be prepared for the vehicle delivery times, which will limit large transport convoys to daylight hours and avoid peak hour periods. Any such schedule will be prepared in coordination with related local authorities.

Passengers will not be carried in a vehicle which is not specially designed for that purpose. In any case, passengers will be transported only in passenger compartments of cars, trucks, and shuttles. Seat belts will be worn by the driver and passenger in all vehicles.

EHSS department will be responsible for ensuring that site ambulance drivers are always aware of road closures and alternative routes.

As per the Regulation on Transportation of Hazardous Goods by Road, hazardous materials will be transported through highways and peripheral roads and transportation through residential areas will not be allowed.

4.3.9 Roadways

The Project area will have permanent traffic routes which will be used by staff and visitor vehicles, contractors and delivery vehicles, trucks, and ancillary vehicles.

Roadways and walking paths will be maintained to an acceptable standard.

Adequate lighting will be provided for roadways/pedestrian routes in the hours of darkness. Employees working in an area of potential traffic hazard will wear approved reflective-type vests.

EHSS department will be responsible for organizing the clearing of accumulations of snow and ice from roads and walking paths. An adequate supply of sand/grit/salt will be kept readily available.

4.4 Parking

EPC will designate parking areas for vehicles and work machines within the campsites and construction sites.

Security will be responsible for ensuring that parking does not take place in unauthorized areas such as adjacent to fire hydrants and emergency exits.

When designing car parks the following will be considered:

- Sufficient parking spaces for employees, staff, site visitors and contractors,
- Traffic routes e.g., one-way systems,
- Reverse parking policy,
- Suitable traffic calming measures,
- Pedestrian routes,
- Lighting and disabled access.

4.5 Unloading / Loading

Unloading and loading of vehicles will take place away from general access areas, roads, and sidewalks. No unloading/loading will take place near overhead electric lines, where there is a possibility of a person unloading or loading the vehicle coming into contact with them. The vehicles' routes will be identified based on the lowest overhead electric line height and measures will be applied to ensure safe distance from overhead transmission lines.

Drivers of vehicles will be in a safe place unless required to advise on the distribution of the load. If appropriate, warning tapes will be placed around the unloading/loading areas.

No vehicles will be loaded beyond their rated capacity or beyond the legal limit of gross weight. Unauthorized persons will be distanced away from the vicinity of unloading/loading areas.

Loads containing hazardous materials will be advised before arrival and material safety data sheets will be made available to enable forward planning to take place.

EHSS department will be responsible for assessing the possible implications of the arrival of vehicles, which due to variations in height, length, width, weight, and cargo may need special control measures, such as, but not limited to, route monitoring, road closure, vehicle banksman or overhead line monitoring/removal.

When forklifts are used to transport materials within the site and the driver's view is obscured or when operating in a confined area, a banksman/spotter will always attend. Such help will also be required to guide long vehicles or delivery trucks.

4.6 Critical Transport

Critical transport is the transport performed by long vehicles (greater than or equal to 12 m) or transport carrying heavy loads (applied load greater than or equal to 10 tons per square meter). Critical transport carries risks, especially for the manoeuvring of the vehicle and the strength of the new or already present culverts. The client will utilize routes inside fenced construction areas as much as practicable for transportation.

In any case, the following measures will be taken:

- The load will be placed on the trailer in balance and will be secured by using chain hoists,
- The route will be analysed for safe transportation, including the width and the strength of the route (culverts), the overhead clearance, the turning radius for the roads and the carriage capacity of bridges if any.

- EHSS chief will be informed about the route and the time of transportation,
- Banksman at the front and the end of the vehicle will be available for guidance,
- Another vehicle will lead the transport in advance to clear the road and warn the other parties.

5 TRAINING & AWARENESS

All employees including employees of Client, EPC, and its sub-contractors will receive general workplace orientation, site-specific workplace orientation and comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The training will be conducted at predefined intervals and during daily toolboxes.

All drivers employed by the Client, EPC, and its sub-contractors will undertake an initial medical check to establish their fitness for the nature of work they are employed to undertake, and these checks will be renewed annually.

Vehicle drivers and equipment operators will be qualified and have the required licenses (driver's licenses, equipment operator licenses) per Turkish Regulations.

Required training as assessed according to risk assessment will be provided. Refresher training on traffic rules and traffic safety will also be conducted for all workers on at least an annual basis.

Drivers of vehicles who are suspected of driving under the influence of drugs or alcohol will be asked to enter a test for alcohol use and if the results are positive, the driver will be subject to disciplinary action.

Training will be delivered to the mukhtars and responsible personnel including the adults and children in nearby settlement areas along the transportation routes for raising awareness of the project-induced hazards (i.e., increased traffic, construction areas, etc.).

Regular internal and external (when necessary) training will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
TMP-1	Speed Limits	IVMS system will be installed for light vehicles. Vehicle speeds will be monitored through speed guns	EPC	Continuously

ID	Topic	Method	Responsibility	Frequency
TMP-2	Accidents	Any traffic accident/incident will be recorded	EPC and its sub-contractor	In case of any accident/incident
TMP-3	Inspection	Daily vehicle checks will be recorded	EPC and its sub-contractor	Daily
TMP-4	Maintenance	Inspection reports of the vehicles will be recorded.	EPC and its sub-contractor	At each inspection
TMP-5	Signage	Signage and physical security measures will be visually checked	EPC and its sub-contractor	Continuously
TMP-6	Eligible to work	Driver/operation licenses of drivers/operators and their medical survey results will be checked.	EPC and its sub-contractor	Annually
TMP-7	Grievance	Number of grievances received regarding traffic management will be recorded.	EPC and its sub-contractor	Continuously
TMP-8	Training	Training will be given to employees	EPC and its sub-contractor	Biannually
TMP-9	Authorized routes	Compliance with the usage of authorized routes will be visually checked	EPC and its sub-contractor	Continuously
TMP-10	Monitoring	Number of speed limit breaches	EPC and its sub-contractor	Continuously
TMP-11	Monitoring	Vehicle inspection reports recorded	EPC and its sub-contractor	Continuously

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the traffic management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
TMP-KPI-1	Number of traffic accident/incident	Kalyon Enerji/ EPC and its sub-contractor	Monthly	Zero per year
TMP-KPI-2	Number of Inspections/audits regarding traffic management completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
TMP-KPI-3	Traffic-related training completed vs. planned	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%
TMP-KPI-4	Total % of Traffic-related non-conformities closed within the agreed	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%

ID	Key Performance Indicator	Responsibility	Frequency	Target
	timeframe			
<i>TMP-KPI-5</i>	Total % of Traffic-related grievances closed within the agreed timeframe	Kalyon Enerji/ EPC and its sub-contractor	Monthly	100%

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.

APPENDIX A – DAILY VEHICLE / EQUIPMENT CHECKLIST

Inspection Date: _____

Inspector: _____

Inspector's Signature: _____

No	Requirement	Status
1	4 Wheel Drive	
2	IVMS (In Vehicle Monitoring System) and front-view camera	
3	Seatbelts (for the driver and all passengers riding in vehicles used to transport multiple individuals)	
4	Rear-view mirrors (internal and external on both sides)	
5	Lights (head & tail, stop, turn signal, and emergency warning)	
6	Reflective warning triangle (portable emergency warning)	
7	Signages	
8	Daytime running lights	
9	ABS brakes (and Electronic Stability Program ESP, where possible)	
10	Backup alarms	
11	Fire extinguishers	
12	Spare tire in good condition	
13	Hydraulic jack	
14	Environmental and emergency procedures manuals	
15	HI VIS vest	
16	Emergency phones numbers	
17	Driver handbook	
18	Drinking water supply	
19	First aid kits	
20	Large candle backup light	
21	Emergency survival kits (climate/location specific)	
22	Flashing lights (construction vehicles)	
23	Spare light bulb kit	
24	Fog lights	
25	Tow Line with suitable capacity	
26	Inspection and Drug and Alcohol Warning Decal to be posted on the driver's side front windshield/screen at the bottom corner, so as not to restrict driver's view.	

APPENDIX B – SAFETY INSPECTION REPORT FORM

Inspection Date: _____

Inspector: _____

Inspector's Signature: _____

Items	Description
Details of the Vehicle (Fleet number and/or registration number)	
Odometer reading (km)	
Details of Inspection	1 2 3 4 5 6 7 8 9 10
Defects identified (if any)	
Details of repair and the responsible person	
Conclusion (Closing statement indicating the repair is successful and mark for the vehicle whether in service or not in service)	<input type="checkbox"/> in-service <input type="checkbox"/> not in-service



YEKA GES 3 VE 4 Güneş Enerjisi Yatırımları A.Ş., Türkiye

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Waste Management Plan

28 July 2023

Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.
00	Initial draft	

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1 INTRODUCTION

This document is the Waste Management Plan (WMP) for the G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project (“the Project”). This WMP sets out the requirements for management of environmental impacts, particularly with regard to the waste management during implementation of the Project.

The Plan is applicable to construction, operation, and decommissioning phases of the Project. It will be reviewed at least 2 months before operation and updated at least 1 year before decommissioning.

The requirements set out in this WMP are applied to all activities throughout the lifecycle of the Project, including those carried out by contractors.

G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant having a total capacity of 65 MWp /50 MWe, is planned by Kalyon Enerji Yatırımları A.Ş. (“Kalyon Enerji”) and this Project will be developed and constructed by YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. (“Client”), a subsidiary of Kalyon Enerji. The Project will be located in Gaziantep Province, Şahinbey District, Kürüm Neighbourhood in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 135,808 MWh of electricity annually, and the electricity produced will be connected to the national grid planned by TEİAŞ independently of the Project and passing through the Project site.

This Plan has been developed according to the Turkish regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs) IFC General and Sector Specific Environmental, Health and Safety (EHS) Guidelines, IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, Equator Principles (EPs) IV and Organisation for Economic Co-operation and Development (OECD)’s Common Approaches.

1.1. Scope

This WMP applies to all Project activities under the Client’s supervision, EPC, its sub-contractors and to all employees. The Client is the main responsible for the implementation of this Plan. EPC and its sub-contractor will be responsible to work in line with all environmental and social management systems (ESMS) of the Client.

This Plan applies to normal conditions during the construction, operation and decommissioning phase activities and it is a living document, and the responsibilities, procedures and compliance actions should be updated as appropriate.

This Plan has been developed in accordance with Client policies, commitments undertaken in the EIA, Turkish regulatory framework and international standards and requirements (including IFC PSs, sector-specific guidelines, etc.). Revision may be required based on findings of the Environmental and Social Impact Assessment (ESIA) Package.

1.2. Objective

The objective of this Plan is to;

- define the scope and applicable interphases for the management of wastes during all project activities,
- define project standards in terms of components,
- define responsibilities, commitments, operating procedures, and instructions for the implementation of this Management Plan,
- manage components and monitor Project performance,
- define training requirements, monitoring measures and Key Performance Indicators

1.3. Abbreviations

Abbreviation	Definition
Client	YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
EHS	Environment, Health, and Safety
EHSS	Environment, Health, Safety and Social
EPC	Engineering, Procurement, and Construction
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practices
GRM	Grievance Redress Mechanism
HR	Human Resources
H&S	Health and Safety
IFC	International Finance Corporation
Kalyon Enerji	Kalyon Enerji Yatırımları A.Ş.
KPI	Key Performance Indicator
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Line
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
PPE	Personal Protective Equipment
Project	G3 Gaziantep-1-1, 2-1, 3-1 Solar Power Plant Project
PSs	Performance Standards
SDS	Safety Data Sheet
TEİAŞ	Turkish Electricity Transmission Corporation
WMP	Waste Management Plan
WWTP	Wastewater Treatment Plant

2 REFERENCE & LEGAL REQUIREMENTS

This section includes policies, standards, and requirements of reference for this Plan that are applicable for, but not limited to, construction, operation, and decommissioning phases of the Project.

Project standards are described in the Project ESIA and are listed below:

- National legislative requirements and all permits, licenses, and approvals,
- EPs IV,
- IFC PSs and EHS Guidelines,
- OECD's Common Approaches,
- Other good international industry practices (GIIP),
- International conventions and Protocols Türkiye is a party to, and
- Kalyon Enerji's policies, related practices, and procedures.

2.1 National Requirements

- Regulation on Waste Management
- Regulation on Control of Excavation Soil, Construction and Demolition Wastes
- Regulation on Control of Waste Batteries and Accumulators
- Regulation on Control of Vegetative Oils
- Regulation on Control of Medical Wastes
- Regulation on Control of End-of-Life Tires
- Regulation on Control of PCB and PCTs
- Regulation on Management of Waste Electrical and Electronic Equipment
- Regulation on Restriction of Some Hazardous Materials in Electrical and Electronic Devices
- Regulation on Management of Waste Oils
- Regulation on Control of End-of-Life Vehicles
- Regulation on Control of Packaging Wastes
- Regulation on Landfills
- Regulation on Incineration of Wastes
- Regulation on Zero Waste
- Communiqué on Recycling of Certain Non-Hazardous Wastes

2.2 International Requirements

The EPs are a set of voluntary environmental and social guidelines that have been adopted by a significant number of financial institutions influential in the project finance market. The EPs comprise a set of ten broad principles that are underpinned by the environmental and social policies, standards, and guidelines:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate

Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.

- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan (ESMP) will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, underscores the importance of managing environmental and social performance throughout the life of a project. An effective ESMS is a dynamic and continuous process initiated and supported by management, and involves engagement between the client, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.

IFC PS 3 Resource Efficiency and Pollution Prevention, outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. In addition, this PS promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

IFC EHS Guidelines - The EHS Guidelines are technical reference documents with general and industry-specific examples of GIIP. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs.

IFC EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial, and industrial areas.

2.3 Related Project Documents

This Plan is part of the overall suite of Management Plans developed for the Project. This Plan has overlaps and cross-linkages to a number of other Management Plans which have waste management implications, including:

- Traffic Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0003)
- Pollution Prevention Plan (KLYEN-G34ANT-SUS-ENV-PLN-0001)
- Emergency Preparedness and Response Plan (KLYEN-G34ANT-SUS-OHS-PLN-0001)
- Soil Management and Erosion Control Plan (KLYEN-G34ANT-SUS-ENV-PLN-0003)
- Resource Efficiency Management Plan (KLYEN-G34ANT-SUS-ENV-PLN-0002)
- Hazardous Material Management Plan (KLYEN-G34ANT-SUS-OHS-PLN-0002)
- Community Health and Safety Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0001)
- Security Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0003)
- Contractor Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0001)
- Supplier Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0003)
- Camp Site and Offsite Accommodation Management Plan (KLYEN-G34ANT-SUS-GEN-PLN-0002)
- Cultural Heritage Management Plan and Chance Find Procedure (KLYEN-G34ANT-SUS-SOC-0006)

- Labor Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0002)
- Human Rights Management Plan (KLYEN-G34ANT-SUS-SOC-PLN-0004)
- Stakeholder Engagement Plan (KLYEN-G34ANT-SUS-SOC-PLN-0005)

3 ORGANIZATONAL STRUCTURE

3.1 Project Implementation Organization Chart

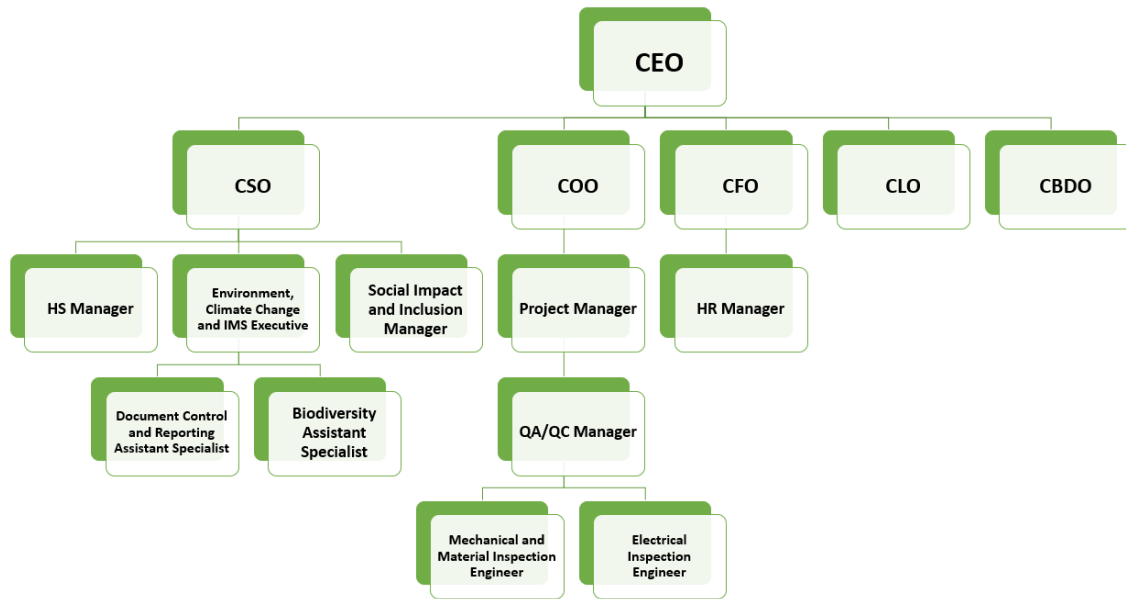


Figure 1: Organization Structure of the Kalyon Enerji

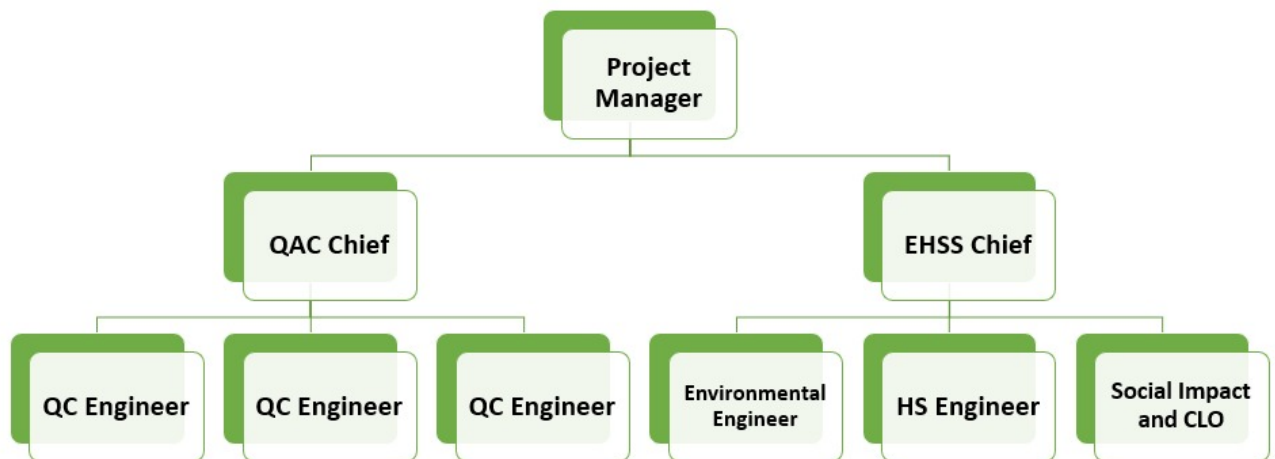


Figure 2: Organization Structure of the EPC

3.2 Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan will be revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
<i>Kalyon Enerji Chief Sustainability Officer</i>	<ul style="list-style-type: none"> Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements. Monitor the E&S performance of the Portfolio projects at the corporate level
<i>Kalyon Enerji Chief Operation Officer</i>	<ul style="list-style-type: none"> Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
<i>Kalyon Enerji Project Manager</i>	<ul style="list-style-type: none"> Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level.
<i>Kalyon Enerji Environment, Climate Change, and IMS Executive</i>	<ul style="list-style-type: none"> Manage, improve, monitor, and update this Plan. Ensure technical support is provided to -EPC and its sub-contractor for implementation of the Plan. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
<i>Kalyon Enerji HS Manager</i>	<ul style="list-style-type: none"> Ensure health and safety practices are implemented, by workers and EPC and its sub-contractor
<i>Kalyon Enerji Social Impact and Inclusion Manager</i>	<ul style="list-style-type: none"> Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Responsible for the corporate communication strategy, attending meetings with the stakeholders if required and ensuring compliance with the Stakeholder Engagement Plan.
<i>EPC Project Manager</i>	<ul style="list-style-type: none"> Ensure adequate resources are provided for implementation of this Plan. Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
<i>EPC EHSS Department</i>	<ul style="list-style-type: none"> Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji. Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in

Roles	Responsibilities
	collaboration with human resource/personnel affairs and corporate communication teams.
<i>EPC - Personnel Affairs Chief</i>	<ul style="list-style-type: none"> • Maintain HR records. • Process HR transactions. • Regulatory compliance related to recruitment, employment, and training. • Report to government and other bodies on compliance with commitments and on other occasions as required by legislation. • Organize the trainings related to this Plan for the personnel they are responsible for. • Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits
<i>Security</i>	<ul style="list-style-type: none"> • Control incoming and outgoing traffic at all times. • Report all security issues to the HSSE Chief. • Involve in the investigation team for the investigation of the security incidents. • Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions. • Ensure all mitigation measures and management controls are implemented properly. • Ensure that only properly trained and qualified security personnel are employed. • Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions, and safety considerations.
<i>Sub- contractors</i>	<ul style="list-style-type: none"> • Develop its own procedure to fully implement this Plan. • Ensure compliance with Project standards and contractual agreements. • Ensure related non-compliances are recorded and responded to immediately. • Conduct internal audits and record identified incompliances. • Provide related trainings. • Appoint a responsible person for activities defined in this Plan. • Provide staff, equipment, and material for the implementation of measures defined in this Plan. • Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
<i>All Employees</i>	<ul style="list-style-type: none"> • Participate in the trainings. • Ensure compliance with measures defined in this Plan.
<i>Camp Manager</i>	<ul style="list-style-type: none"> • Support to effective implementation of this plan at the camp site. • Develop an internal audit checklist, perform regular inspections/audits, maintain records and report back to EHSS Chief on the outcomes of the inspections/audits. • Take action on complaints concerning the area of competence. • Supports the resolution of complaints related to the area of competence.

4 MANAGEMENT & MITIGATION REQUIREMENTS

4.1 Waste Management Approach

IFC EHS Guidelines-Waste Management document provides a waste hierarchy which lays down priorities for the best overall environmental option. Based on that, management of wastes will be carried out as following, in the order of decreasing preference:

1. Prevent waste generation where possible,

2. Reduction of wastes by setting measures where possible,
3. Reuse waste/excess materials where feasible,
4. Recover waste materials where feasible,
5. Recycle waste materials where feasible,
6. Dispose waste off-site by a licensed waste company.

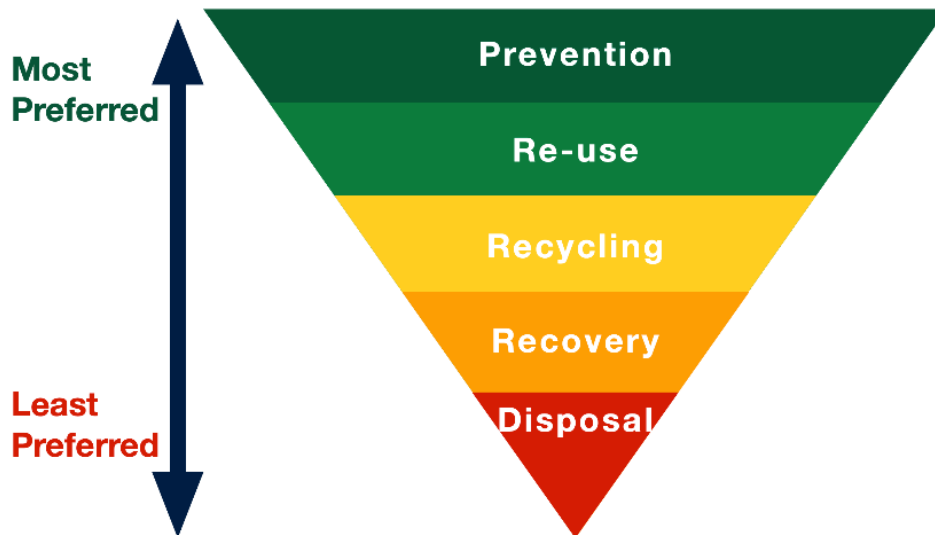


Figure 3: Waste Hierarchy

Avoid (Prevention) – Develop product management such as substitution and product conservation by Project management.

Reduction – Minimize the waste generation through eliminating or decreasing, to the extent practical, the volume or relative toxicity of wastes generated by using alternate materials, processes, or procedures.

Reuse – Potential waste materials can be re-used in place of new products where quality of services and products will not be an issue.

Recycling and recovery – Convert the waste into usable materials or recover the energy content of waste.

Disposal – Dispose the waste in environmentally acceptable manner at final licensed facilities.

In order to minimize and appropriately manage the wastes generated on site, following good management practices will be used:

- During all phases of the Project, Client and contractors will identify all potential waste streams at their point of generation, their nature (classification) and quantity to be generated in order to identify opportunities to apply waste management hierarchy. Types and quantities of the wastes to be generated will be monitored throughout the project lifetime.
- Prevention of waste generation via management practices (such as instituting procurement measures

that recognize opportunities to return usable materials, avoiding or decreasing amount of hazardous wastes by preventing commingling of non-hazardous and hazardous waste, etc.) will be the primary aim of this Plan.

- Reduction of waste generation (via management practices, avoiding or decreasing materials use, etc.) will be the secondary aim of this Plan.
- Waste recycling will be promoted within all Project activities and related trainings will be provided accordingly.
- Hazardous wastes will be segregated from non-hazardous wastes.
- Personnel responsible from the handling of wastes will be trained regarding to proper handling and management practices.
- Waste storage areas will be inspected regularly to ensure proper waste management measures are taken.
- Wastes will not be disposed on-site under any circumstances.
- Wastes to be sent to licensed recycling/recovery firms will be segregated by type.

4.2 Classification of Wastes

The Project activities will lead to the generation of both hazardous and non-hazardous wastes as classified below.

4.2.1 Hazardous Wastes

Types of hazardous wastes that are expected to be generated from the Project activities are:

- Packaging wastes that came into contact with hazardous materials,
- Waste batteries and accumulators,
- Medical wastes,
- Personal hygiene material wastes (such as single use masks, gloves),
- Waste oils (from maintenance of equipment and vehicles etc.),
- Waste vegetable oils (from catering).

4.2.2 Non-Hazardous Wastes

Typical non-hazardous wastes that are expected to be generated, are given below:

- Inert domestic wastes,
- Biodegradable domestic wastes,
- Recyclable wastes (e.g. paper, glass, metals, wooden waste, trees, tin cans, textile, etc.),
- Packaging wastes,
- Waste tires,
- Sludge generated from the package wastewater treatment plant (WWTP) (subject to analysis to confirm it is non-hazardous)

4.3 Waste Collection, Segregation, Storage, Transportation and Disposal

In line with the Regulation on Waste Management, an industrial (hazardous and non-hazardous) waste management plan will be prepared and submitted to the Provincial Directorate of Environment, Urbanization and Climate Change for every three years.

4.3.1 Collection, Segregation and Storage

Hazardous and non-hazardous wastes will be collected separately and stored in different coloured containers in designated temporary waste storage areas.

4.3.1.1 Hazardous Wastes

- Hazardous Waste Temporary Storage Areas will be established at the construction camp sites for the temporary storage of hazardous wastes. Hazardous wastes will be stored in the Hazardous Waste Temporary Storage Areas that will have lean-to roof, concrete floor, closed top, four sided walls and proper drainage for spills/leaks. Within this respect, blind shaft will be provided against spillages and ground will be directed to blind shaft via slope.
- In accordance with international standards and international common practice, hazardous wastes will be stored in containers that are non-damaged, leak-proof, safe and appropriate. The containers will be kept closed.
- Hazardous wastes will be stored in a way that they will not have chemical reactions.
- Hazardous waste liquids will have a secondary containment to prevent any leaks and spills.
- The hazardous waste containers will be checked regularly, to determine whether they are damaged or any spillage has occurred.
- All waste containers will have clear identification and accurate description of the type of waste. This will provide information to personnel for safe handling of waste.
- Waste labels will include information such as waste classification/category, volume of waste, Safety Data Sheet (SDS) and required Personal Protective Equipment (PPE). Any old labelling on the containers will be removed to avoid confusion.
- Storage areas will be locked to prevent entering of the unauthorized personnel.
- Absorbents/spill kits and fire extinguishers will be located near the storage area in cases of any spillage/leakage or fire emergency resulted by an accident.
- Access to this area will be limited and a responsible person for these areas will be appointed. The name and contact number of said responsible person will be posted on the storage area.
- When any oil/fuel/lubricant spill or leakage occurs at site, the contamination will be controlled by using absorbents and if there will be any contaminated soil, it will be stripped to the adequate depth and stored as hazardous waste.
- According to the categories referred to in the Regulation on Management of Waste Oils, waste oils will be temporarily stored, handled, and disposed in separate containers. Waste oil will be collected inside the containers that will be placed on an impermeable surface. Different containers will be used for different categories of waste oils. Waste oil temporary storage containers will have "Waste Oil" sign on.
- Discharge of the waste oils to receiving environments or lavatories/sinks will not be allowed under any circumstances.

- Waste batteries and accumulators will be collected and stored separately in compliance with Regulation on Control of Waste Batteries and Accumulators.
- Medical wastes and personal hygiene material wastes (such as single use masks, gloves) will be collected separately from other wastes in compliance with Regulation on Control of Medical Waste.
- All unidentified wastes will be treated as hazardous waste.
- Hazardous wastes will be stored for maximum six months.
- Hazardous waste liability insurance will be obtained for the temporary hazardous waste storage area.

4.3.1.2 Non-Hazardous Wastes

- Waste containers that are made of suitable material and integrally sound, will be used.
- All containers will be clearly marked according to contents.
- Waste will always be stored securely to prevent dispersion and resulting pollution.
- Waste that might be windblown will be covered and secured.
- Covers of the waste bins, especially bins that contain food wastes, will be kept closed to prevent scavenging by birds and animals.
- Wastes that could be waterborne will be sheltered to prevent dispersion.
- Domestic wastes (inert domestic wastes and biodegradable domestic wastes) will be collected in special trash bins and temporarily stored onsite in compliance with Regulation on Waste Management and Regulation on Zero Waste.
- Recyclable wastes will be separated and stored temporarily onsite in reserved areas.
- Packaging wastes will be collected separately and temporarily stored onsite in reserved areas in compliance with Regulation on Control of Packaging Wastes.
- As the maintenance and repair operations will be carried out in the maintenance workshops to be established at the main construction camp sites, in cases where tires of vehicles and the construction machines need to be changed, the changed tires will be kept in special reserved places in line with Regulation on Control of End-of-Life Tires.
- During the establishment and decommissioning of social and administrative buildings, concrete wastes might be generated. These wastes will be disposed in accordance with the Regulation on Control of Construction and Demolition Wastes.
- During the operation of package WWTP, generation of sludge will be expected. After the commence of the plant, characteristics of the sludge will be assessed by laboratory analyses in accordance with the Regulation on Waste Management. Based on the results of the analyses, the sludge will be sent to licensed disposal areas.
- Non-hazardous wastes will be stored for maximum 1 year.

4.3.2 Transportation and Disposal

The following management practices given in the sub-sections will be used during the transportation, reuse, recovery, recycling, and disposal of hazardous and non-hazardous wastes.

4.3.2.1 Hazardous Wastes

- Protocols will be signed with the licensed facilities for the transfer and disposal/recycling of hazardous wastes. As per the clauses to be included in the protocols, when required licensed facilities will be obligated to provide permits/approvals, relevant reports, drawings, agreements, calculations, or any other related document in order for Client to check the suitability and capacity of the services provided. Additionally, Project personnel will be allowed to conduct periodic site visits/audits to visually confirm that the Project wastes are being managed in an environmentally responsible manner.
- Hazardous wastes will be transported off site when the storage on site are nears maximum storage capacity levels.
- Hazardous wastes will be securely packed and labelled prior to transportation to ensure that wastes can be transported safely to the approved disposal site without risk to those handling the waste or to the environment.
- Licensed disposal facilities will be used for transfer and disposal of hazardous wastes.
- Waste vegetable oils will be collected in special containers to be sent to licensed companies for reuse/recovery. These waste oils will be disposed in compliance with Regulation on Control of Vegetative Oils.
- Waste oils will be transported to the licensed processing and disposal/recover facilities. Waste Oil Declaration Form in Appendix of Regulation on Management of Waste Oils will be filled and sent to the Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC) until the end of February of the following year.
- Separately collected waste batteries and accumulators will be delivered to the collection points established by enterprises engaged in the recovery, distribution and sales of battery products; or by municipalities.
- Medical wastes and personal hygiene material wastes (such as single use masks, gloves) will be sent to a nearby healthcare facility or a medical waste disposal firm, under the supervision of the workplace doctor.
- Each year the annual waste declaration form will be filled and submitted to the online waste declaration system (MoTAT) of Ministry of Environment, Urbanization and Climate Change, starting from January and until the end of March at the latest, by including the information of the previous year. Each record will be kept for five years.

4.3.2.2 Non-Hazardous Wastes

- Protocols will be signed with the related municipalities or provincial administrations for the transfer of domestic wastes for the disposal and recycling. As per the clauses to be included in the protocols, when required licensed facilities will be obligated to provide relevant reports, drawings, agreements, calculations, or any other related document in order for Client to check the suitability and capacity of the services provided. Additionally, Project personnel will be allowed to conduct periodic site visits/audits to visually confirm that the Project wastes are being managed in an environmentally responsible manner.
- Agreements will be signed with licensed firms for transportation of segregated recyclable and packaging wastes.
- Waste tires will be delivered to the licensed transportation and disposal/recycling companies.

5 TRAINING & AWARENESS

All employees will be provided with general induction training for waste management before starting work in the site. All employees including employees of EPC and its subcontractors will receive general workplace orientation, site-specific workplace orientation and a comprehensive training that includes environmental and social awareness and compliance training to be aligned with Project ESIA and ESMS. The trainings will be conducted at predefined intervals and during daily toolboxes.

Regular internal and external (when necessary) trainings will be given to ensure that the mitigation measures indicated in this Plan are applied during the construction, operation, and decommissioning phases of the Project for all involved parties.

6 COMMUNICATION & REPORTING

Evidence of the implementation of the actions/measures, monitoring activities and Key Performance Indicators (KPIs) will be collected through inspection and audit activities and will be summarized in a Report on a biannual basis that will be made available to stakeholders, lenders etc. if requested, which is under the responsibility of Kalyon Enerji.

During operation Kalyon Enerji and during construction EPC and its subcontractors are responsible to record the measurement results, maintenance activities, incidents etc. on a monthly basis and report to the Kalyon Enerji. If any subcontractor is involved, it is responsible for duly implementing requirements included in this Plan under the during operation Kalyon Enerji and during construction EPC and its subcontractor's supervision.

6.1 Monitoring Activities

For all wastes; the waste types, amount collected of each type and waste classifications, will be recorded on a monthly basis. Records for generated waste, from time of generation to final destination, will be maintained. Within this regard, a sample waste log form is provided in Appendix A.

Daily inspections regarding on-site management of wastes will be conducted during all phases of the Project. A sample checklist for subjects to be covered during inspections is provided in Appendix B.

Key internal monitoring activities are presented in the table below.

Table 2: Key Monitoring Activities

ID	Topic	Method	Responsibility	Frequency
WMP-1	Waste Generation	Waste generation amounts according to waste types and disposal methods will be recorded	EPC and its sub-contractor	Monthly
WMP-2	Waste Management	Waste storage areas and site waste management practices (segregation, storage) will be inspected	EPC and its sub-contractor	Daily
WMP-3	Transfer and Disposal	The validity of the agreements and protocols regarding waste transfer and disposal will be checked.	EPC and its sub-contractor	Annually
WMP-4	Transfer and Disposal	Waste disposal/recycling/reuse facilities will be audited to confirm that the Project wastes are being managed in an environmentally responsible manner.	Kalyon Enerji/ EPC and its sub-contractor	Quarterly
WMP-5	Hazardous Wastes	Annual waste declaration records will be checked.	EPC and its sub-contractor	Annually

ID	Topic	Method	Responsibility	Frequency
WMP-6	Grievance	Number of grievances received regarding to waste management, will be recorded.	Kalyon Enerji/ EPC and its sub-contractor	Monthly
WMP-7	Training	Training will be given to employees.	Kalyon Enerji/ EPC and its sub-contractor	At least 2 times a year As required
WMP-8	Records	Statistical trend of spillages / leakages resulting soil contamination	Kalyon Enerji/ EPC and its sub-contractor	Monthly

6.2 Key Performance Indicators

The table below summarizes the key performance indicators related to the waste management practices of the Project.

Table 3: Key Performance Indicators

ID	Key Performance Indicator	Responsibility	Frequency	Target
WMP-KPI-1	Waste types, amount collected of each type and waste classifications	EPC/ Subcontractors	Monthly	Minimized and continued improvement in waste generation amounts
WMP-KPI-2	Percentage of recycle-reuse wastes per total amount of wastes produced	EPC/ Subcontractors	Monthly	60%
WMP-KPI-3	% of the validity of the agreements and protocols regarding waste transfer and disposal	EPC/ Subcontractors	Monthly	100%
WMP-KPI-4	Number of spillages / leakages resulting soil contamination	EPC/ Subcontractors	Monthly	Zero per year
WMP-KPI-5	Inspections completed vs. planned	Kalyon Enerji/EPC/ Subcontractors	Weekly	100%
WMP-KPI-6	Waste related trainings completed vs. planned	Kalyon Enerji/ EPC/ Subcontractors	Weekly	100%
WMP-KPI-7	Total % of non-conformities related to waste management closed within the agreed timeframe	Kalyon Enerji/ EPC/ Subcontractors	Monthly	70%
WMP-KPI-8	Total % of grievances related to waste management closed	Kalyon Enerji/ EPC/ Subcontractors	Monthly	70%

ID	Key Performance Indicator	Responsibility	Frequency	Target
	within the agreed timeframe			

7 INSPECTIONS & AUDITS & REVIEW

Evidence and results of the inspection and audit activities and KPIs will be included in the audit reports. Project Management will review the audit reports and the progress of the preventive/corrective actions and will take additional appropriate actions if necessary.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This Plan will be controlled and will be revised at least once a year in consideration of the following conditions:

- Management review outcomes,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints.

APPENDIX A – WASTE REGISTER LOG

No	Date	Type (Hazardous / Non-Hazardous)	Waste Code	Total Amount (ton or m ³)	Transporter	Disposer	Disposal Method
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

APPENDIX B – WASTE MANAGEMENT INSPECTION CHECKLIST

Inspection Date:

Inspection Location:

Control Measure	Compliance (Yes/No)	Comment
Are all waste streams being properly separated and labelled into the following categories? - Hazardous waste - Non-hazardous waste		
Is the site waste inventory current and up to date?		
Are hazardous and non- hazardous wastes being stored at separate locations?		
Has a map been produced showing the correct waste storage locations which are visible to all workers?		
Are all waste storage containers appropriately labelled to prevent cross contamination of waste materials?		
Are all waste labels complete with the appropriate information to include: - Waste stream (Hazardous, non-hazardous, etc.) - Type of waste (solid, liquid or sludge) - Amount of waste - Known environmental, health and safety hazards (e.g. SDS forms) - Personal protective equipment (PPE) required		
Are licenses of companies contracted for waste transport and waste disposal valid and up-to-date?		