

ENVIRONMENTAL SOCIAL ACTION PLAN

DRAFT

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
PS1	Assessment and Management of Environmental and Social (E&S) Impacts and Issues					
1.1	Project E&S Policies Project E&S Policies to be endorsed by the senior management and to be reviewed and updated at regular intervals.	Governance of ESMS, Commitment to international requirements of lenders.	IFC PS1 EP4 Principle 4 OECD Common approaches	SPV	Prior to FC Regular updates thereafter	Policies developed and integrated as part of ESMS, endorsed by Project Sponsor's Senior Management
1.2	Environmental and Social Impact Assessment Update and finalise the ESIA with improved baseline and impact assessments in relation to the following: Air Quality <ul style="list-style-type: none"> During the pre-construction and construction period, a minimum one-week continuous baseline measurements should be conducted for PM₁₀ and PM_{2.5} measurements. Modelling studies regarding settled dust should be completed and incorporated to the report, additional mitigation measures and/or monitoring activities should be defined, if deemed necessary. Noise and Vibration <ul style="list-style-type: none"> Noise impact assessment should be updated in accordance with the Project standards (i.e. max 3 dBA exceedance) and cumulative noise impacts should be considered. Vibration impact assessment calculations should be updated to include impact on properties and other receptors located within close proximity to site (0-30m) GHG Emissions <ul style="list-style-type: none"> Baseline to be updated to include a regional baseline for GHG emissions, indirect GHG emissions (Scope 3) and GHG emissions associated with current traffic volumes. A methodology for how physical climate risks, potential impacts and adaptation measures have been determined. GHG emissions reporting should be extended to include embodied carbon of primary materials used in construction and emissions associated with forecast traffic flows in the operational phase. Climate Risk Assessment <ul style="list-style-type: none"> The ESIA should provide a risk matrix-based assessment which assesses hazard x exposure x vulnerability/sensitivity in relation to physical climate impacts and include further commentary on snow and the impact of snow loading under the SSP5-8.5 scenario, as well as further commentary on landslides. Compatibility or consistency with the host countries National Climate Commitments should be confirmed within the ESIA. An approach to undertaking a more detailed physical climate risk assessment should be developed. Social Assessment <ul style="list-style-type: none"> Update livelihood impacts following the land acquisition studies and Resettlement Action Plan Update vulnerable categories and align across all E&S documents and plans; Provide further evidence and consideration of the risks and impacts associated with ecosystem services; Update the stakeholder engagement section to reflect feedback received during EIA consultation process 	Management of ESHS risks in accordance with national and Lenders' requirements, and international best practice.	IFC PS1, EP4 Principle 2	SPV	Prior to FC	Final ESIA with updated baseline and assessments

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	<ul style="list-style-type: none"> Update ESIA with appended minutes of public consultation meetings in a comments matrix to demonstrate how the Project has addressed the comments/feedback received from stakeholders and public once draft and final ESIA disclosures take place after Lenders' approval; <p>Biodiversity</p> <ul style="list-style-type: none"> Provide clarity regarding surveys undertaken across the wider Project components, including survey figures, results and timings Provide clarity on survey effort, including specific dates, time spent and exact locations of transects/point counts etc. Additionally, more detail on absolute/relative abundances of receptors should be provided. Justification for the lack of terrestrial invertebrate surveys should be provided. Additional clarity to be provided around bat surveys. Additional figures should be produced that illustrate survey findings, with results tables also included within the reports. Area of Influence for Biodiversity be refined to more accurately cover effect pathways from the whole Project (including wider Project components). justification for the conclusions made regarding receptor sensitivity and effect significance (with reference to the losses predicted). Operational impacts should be assessed for each receptor scoped into for assessment. The impact assessment should be updated to ensure that impact magnitude and effect significance is robustly justified, including detail on predicted losses (of habitat hectares, and/or likely species numbers), and all current tables/details should be double checked to ensure consistency throughout. Some of the detail currently included within the BAP (e.g. on habitat losses) should be presented within the ESIA to inform the assessment. Natural Habitat should be discussed in detail regarding how this has been classified (if not included explicitly within the CHA). The operational impacts section should be updated to include receptor-specific assessment of potential operational impacts. <p>Cultural Heritage</p> <ul style="list-style-type: none"> Provide details of current status of statutory engagement – and related mitigation commitments. Include a more robust assessment of indirect effects, including vibration. Include reference to the IFC categories of heritage valuation ('non-replicable' etc), to inform application of the mitigation hierarchy – and assure avoidance. The ESIA studies should consider any potential impacts on paleontological resources – and incorporate an assessment / mitigation commitment as appropriate. Include further baseline data on the prevalent communicable and non-communicable diseases in the affected region; <p>General</p> <ul style="list-style-type: none"> Update Cumulative Impact Assessment to align with the CIA methodology to consider impacts on the VECs 					

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	<ul style="list-style-type: none"> Include an assessment on associated facility eligibility. Include cost estimates for implementation of the ESMP and associated monitoring if required by lenders. 					
1.3	Organisational Capacity <ul style="list-style-type: none"> Provide adequate and competent resources throughout the construction and operation phases of the Project. Update Project Organogram to provide lines of communication and reporting between the EPC Contractor and the SPV, as well as interactions with KGM and the Ministry of Finance as appropriate. Provide further details on H&S and E&S roles and responsibilities assigned to specific personnel. Fill vacant positions as soon as possible. 	Increasing capacity and competency to manage social performance of the Project.	IFC PS1 EP4 Principle 4 Best practice.	SPV & EPC	On-board vacant positions before signing of loan agreement.	Updated ESHS Organogram with reporting lines between SPV and EPC. Clear job descriptions for each position with roles and responsibilities. Vacant positions filled and CVs shared with lenders if required.
1.4	Project ESMP Project ESMP should be updated to: <ul style="list-style-type: none"> Ensure that specific mitigation measures in the draft ESIA are reflected in the site-specific MPs and procedures. Ensure the Emergency Preparedness and Response Plan and Storm Preparedness Plan include adverse weather / climate-related control measures. Include reference to GHG emissions reduction and climate resilience and adaptation measures within relevant ESMS policies and procedures. Ensure that physical climate adaptation measures are incorporated into the ESMP to ensure their progress is monitored and tracked. Incorporate consideration of community health and safety measures throughout appropriate management plans. 	Management of ESHS risks through a management plan in accordance with and Lenders' requirements and international best practice.	IFC PS1 EP4 – Principle 2 & 4	SPV & EPC	Immediately	Updated ESMP
1.5	Construction Environmental and Social Management Plan (CESMP) <ul style="list-style-type: none"> EPC Contractor to develop an overarching Construction Environmental and Social Management Plan (CESMP) reviewed and approved by the Project Sponsor. 	Management of ESHS risks through an approved CESMP in accordance with and Lenders' requirements and international best practice.	IFC PS1 EP4 – Principle 2 & 4	EPC and SPV	Immediately	CESMP reviewed and approved by SPV
1.6	Operation Environmental and Social Management Plan (OESMP) Develop and implement an operation phase Environmental and Social Management Plan (OESMP) at least six months prior to the start of the operation phase. The OESMP should comprise: <ul style="list-style-type: none"> Waste Management Plan Noise Management Plan Emergency Preparedness and Response Plan Labour Management Plan Occupational Health and Safety Plan Community Health and Safety Management Plan 	Management of ESHS risks through an approved OESMP in accordance with and Lenders' requirements and international best practice.	IFC PS1 EP4 – Principle 2 & 4	O&M Contractor / SPV	6 months prior to the start of operation phase	Operation phase management plans

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	<ul style="list-style-type: none"> Traffic Management Plan Sub-contractor Management Plan Hazardous Materials Management Plan Security Management Plan 					
1.7	<p>Audit of early construction works</p> <p>Prepare and submit a Construction Progress Report (Nov 2024–Sept 2025 is proposed to ensure completion prior to FC) with a corrective action plan (CAP) addressing early works implementation gaps, to be reviewed and approved by the IESC and lenders.</p>	Address ESHS risks associated with early construction works and fully align Project with international standards.	IFC PSs EP4 Principle 4	SPV and EPC	Report & CAP - Prior to financial close Implementation of CAP – prior to initial drawdown / as agreed with lenders	<p>Audit and corrective action plan.</p> <p>Implementation of correction actions.</p>
1.8	<p>Stakeholder Engagement Plan</p> <p>Update the SEP with the following:</p> <ul style="list-style-type: none"> Update and align vulnerable groups with SIA; Under section on public consultation meetings in EIA and ESIA processes, add comments, requests and feedback received during national EIA process and responses to those, in a tabular format. Expand public consultation meetings in additional locations and include women-only meetings to all locations to improve broader engagement and secure higher participation from community members. Include transportation options for community members who would like to travel to the consultation meetings. For the upcoming consultation series for ESIA disclosure package, prepare an engagement schedule with specific measures in line with needs of various vulnerable groups identified in the SEP. Broadcast all ESIA disclosure meetings online for people who prefer to attend online and allow anonymous comments/Q&A functions in those online live meetings. Include and implement measures against reprisal for the public consultation meetings in line with IFC's Good Practice Note: Addressing Risks of Retaliation Against Project Stakeholders (2021). Prepare and share community information brochures, including guide for land acquisition and compensation during consultation meetings. A programme of annual consultation meetings with project stakeholders. <p>SEP to be updated when material changes occur in Project and as a minimum reviewed and updated annually.</p> <p>Review and update the Policy Information on Confidentiality and Security to allow environmental and social performance update and ESIA disclosure and specify disclosure procedures for environmental and social updates on the Project, when needed</p>	Timely dissemination of Project E&S issues, minimising negative feedback by proactive and continuous communications with all affected parties including relevant stakeholders	IFC PS1, EP4 Principle 5	SPV supported by EPC	Prior to ESIA disclosure	<p>Updated SEP.</p> <p>ESIA disclosure schedule detailed with all timelines for different stakeholders and affected groups.</p> <p>Updated Policy Information on Confidentiality and Security</p>
1.9	<p>Information Disclosure</p> <p>ESIA package (including ESIA and annexes, NTS, RAP, SEP and management plans) disclosure for 60 days.</p>	Effective external communication and handling of grievances	IFC PS1 EP4 Principle 5	SPV	Q3 2025	ESIA package disclosed for 60 days. Feedback received and addressed.

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	Prepare community information leaflets and Guide for Land Acquisition with contact details of community liaison officer/s (CLO) and also the grievance mechanism (GM).		Principle 6			Communication materials produced.
1.10	Community Grievance Mechanism Update and implement the Grievance Mechanism (GM) with the following: <ul style="list-style-type: none"> Assign contact person (CLO) and details for the various grievance channels; Reduce grievance resolution from 60 days to 30 days. Ensure Social Chief is adequately trained to handle sensitive grievances; Include anonymity in online grievance forms on Project's website; and Prepare operations manual for Appeals Committee. Disclose community grievance channels and contacts, including appeals committee procedures and procedures to submit sensitive grievances (i.e., GBVH).	Effective and timely handling of grievances.	IFC PS1 EP4 Principle 6	SPV and EPC	Prior to ESIA disclosure	Updated GM Dissemination of communication on the GM
1.11	Progress Reports SPV to provide progress reports to lenders providing updates on labour statistics, EHSS performance, implementation of ESMS/ESMP, details of any permit violations, non-compliances, accidents and incidents.	Ongoing, timely management and reporting on EHSS risks and performance	IFC PS1 EP4 Principle 4	SPV	Quarterly during construction Six monthly during operation Phase (first two years)	Progress Reports
PS2	Labour and Working Conditions					
2.1	Code of Conduct Update Code of Conduct to include: <ul style="list-style-type: none"> Prohibition of GBVH explicitly Disciplinary measures; and Contact details for Whistleblowing. 	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 Turkish Labour Code.	SPV, cascaded to EPC and subcontractors	Immediately	Updated Code of Conduct.

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
2.2	<p>HR Policy and Labour Management Plan</p> <p>Implement HR Policy and HR-LMP including procedures to:</p> <ul style="list-style-type: none"> Verify age and ensure no one below 18 years old is hired in the Project. Report any violations against use of child labour and/or forced labour, as serious incident reporting to Lenders Maintain written contracts with signed copies of Code of Conduct. Monitor overtime, overtime payments and ensure working time does not exceed 270 hours annually. Screen intermediary agencies, subcontractors and suppliers against child and forced labour risks by: <ul style="list-style-type: none"> Ensuring that all relevant licences and registrations in place. Checking media reports and legal cases to ensure no reputational risks, such as human rights violations. Ensuring that no ID documents of the workers are withheld by anyone or any party. Assign targets for local hires and women employment. Conduct an audit on all contracts to ensure HR-LMP commitments are included and extended to EPC and sub-contractors. Conduct monthly monitoring and reporting on labour and H&S performance. 	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 Turkish Labour Code.	SPV, cascaded to EPC and subcontractors	<p>Implementation – immediately</p> <p>Audit of contracts – prior to signing</p> <p>Reporting – monthly, ongoing</p>	<p>Updated LMP and third party audit reports on implementation of LMP, including screening procedures for intermediaries, if and when used</p> <p>Audit of contracts</p>
2.3	<p>Worker's Grievance Mechanism</p> <ul style="list-style-type: none"> Develop and implement a worker's grievance mechanism (GM) for all workers, including SPV, EPC and subcontractors and primary suppliers' workers. Worker GM must allow for anonymous submissions and include multiple channels, with grievants free from any reprisal. Disseminate GM as part of worker rights during induction training. Appoint a responsible person for managing the worker grievance log. Assign responsibility for management of sensitive grievances to a suitably qualified specialist. Maintain an up-to-date GM tracker. 	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 Turkish Labour Code.	SPV	Immediately	Grievance mechanism in place. Grievance records including sensitive grievances. Review and audit findings
2.4	<p>Tolls and Motorway Management system procedures/EPRP</p> <p>Develop and implement the Tolls and Motorway management safety procedures and EPRP for operation stage.</p>	Minimise occupational and community health and safety risks.	IFC PS2 EP4 Turkish Labour Code.	SPV	At least six months before operation phase	Plan and procedures developed, approved and disclosed.
2.5	<p>Worker's Accommodation</p> <p>Worker's accommodation should be in accordance with the IFC/EBRD's 'Workers' Accommodation: Processes and Standards. The worker accommodation site audits should be conducted by independent labour specialist to ascertain technical and physical conditions of the welfare facilities with international standards. Update camp site management plan with any gap filling measures following the camp site/worker accommodation audit. Ascertain the technical and physical conditions of the welfare facilities are in line with the international guidelines.</p>	Management of safe and compliant worker accommodation as well as community health and safety.	IFC PS2 EP4 Turkish Labour Code IFC/EBRD 2009 guideline on Workers' Accommodation:	SPV	Immediately	Worker accommodation audit findings Camp site plan updated as required

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	Prepare corrective actions following the audit findings and disseminate to all camp sites of Contractor and subcontractor to adhere.		Processes and Standards			
2.6	LMP Monitoring Conduct an audit on all contracts to ensure HR-LMP commitments are included and extended to EPC and sub-contractors. Conduct internal labour and H&S monitoring and share regular HR-LMP and OHS monitoring reports with Project's management. Appoint third party/independent labour auditor for HR-LMP monitoring and share monitoring reports with Lenders.	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 Turkish Labour Code.	SPV	Prior to FC Monthly Prior to FC	Audit of contracts Monthly labour and Health and Safety Reports Contract awarded to third party auditor.
2.7	Retrenchment Plan Develop and implement a retrenchment plan for construction phase workers.	Effective workforce management.	IFC PS2 EP4 Turkish Labour Code.	SPV	Six months prior to operation stage	Plan prepared and reviewed by Lenders.
2.8	Supply Chain Establish Supply Chain Risk Management procedures into policy and procedural documents. Develop and implement responsible resourcing policy.	Minimise labour risks in supply chain	IFC PS2, EP4 and Turkish Labour Code.	SPV	Prior to FC	Policy and procedures developed and shared with Lenders.
2.9	Health and Safety Plan (Construction Phase) EPC Contractor to develop and implement a Health and Safety Management Plan. The Plan should also include the following: <ul style="list-style-type: none"> Annual Work Plan and Annual Training Plan in accordance with <i>OHS Law (No: 6331)</i> Establish OHS Committee as per the <i>Regulation on Occupational Health and Safety Committees (Official Gazette No. 28532, dated 18.01.2013)</i>. Job-specific risk assessments and method statements. Permit to Work System Accident and Incident Reporting Procedure Communication and reporting requirements for subcontractors. 	Improved health and safety performance and safe working environment for workforce (permanent contract/contractor & sub-contractor). Compliance with national legislation and international standards.	IFC PS1 IFC PS2 EP4 – Principle 2 & 4 & 6 National legislation	EPC	Immediately	Health and Safety Management Plan Annual Work Plan Annual Training Plan Risk assessment documentation
2.10	Health and Safety Management Plan (Operation Phase) Develop and implement detailed site specific OHS management plans and procedures should be developed and implemented for the operation phase of the Project to cover relevant H&S risks.	Improved health and safety performance and safe working environment for workforce (permanent contract/contractor & sub-contractor). Compliance with national legislation and international standards.	IFC PS1 IFC PS2 EP4 – Principle 2 & 4 & 6 National legislation	O&M Contractor / SPV	At least six months prior to operation start for the operation phase	Operation Phase OHS Management Plan
PS3	Resource Efficiency and Pollution Prevention					
3.1	Permits and Licences	Governance of ESMS and ensuing compliance with	IFC PS1	SPV	Prior to FC	Permit register established.

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	Obtain necessary permits and maintain a permits register for the Project to keep track of the necessary permits, their validity periods, and the issuing authorities.	national permitting requirements	EP4 Principle 3			
3.2	<p>Quarry Management Plan</p> <p>Develop and implement a quarry management plan that provides details of operational procedures and mitigation measures to manage E&S impacts associated with the quarries and borrow pits that are included within the Project. The Quarry Management Plan should provide:</p> <ul style="list-style-type: none"> Assessment of the capacities and adequacy of the quarries / borrow pits to ensure they can meet project demands. Operational procedures for extraction of materials including measures to utilise the already disturbed areas, and minimise disturbance for material extraction Details of storage areas considering their total capacities and usage planning, especially for those located in close proximity to each other. Land use plans that minimise land disturbance during the project's implementation. Health and safety management measures for extraction of materials Traffic management measures for the transportation of extracted materials <p>Mitigation measures for management of community health and safety impacts.</p>	<p>Mitigation of Project impacts</p> <p>Efficient use of resources</p> <p>Compliance with local legislation and IFC PSs</p>	IFC PS3	SPV, supported by external consultants	Immediately	Quarry Management Plan
3.3	<p>Air Quality Management Plan</p> <p>The Air Quality Management Plan should be updated considering:</p> <ul style="list-style-type: none"> Site specific mitigation measures such as installation of real-time PM₁₀ monitoring stations in or near sensitive areas, particularly in Haciali, should be incorporated within the AQMP. Construction Phase monitoring should include monthly dust measurements in the neighbourhoods located within active construction zones during construction phase. Pre-construction baseline measurement requirements should be integrated The revisions regarding construction phase monitoring activities should be reflected in this plan. 	Mitigation of Project air quality impacts.	IFC PS3 EP4	EPC, reviewed by SPV	Immediately	Updated Noise and Vibration Management Plan
3.4	<p>Waste Management</p> <p>Finalise the establishment of the temporary hazardous waste management area promptly and submit all required notifications to local authorities.</p>	Mitigation of Project impacts associated with waste management.	IFC PS3 EP4	EPC, reviewed by SPV	Immediately	Waste management area established.
3.5	<p>Wastewater Management</p> <p>The following actions are recommended with regards to wastewater management:</p> <ul style="list-style-type: none"> Permits related to wastewater treatment plants (WWTP), including the one in the temporary construction area should be obtained, and the treated effluent should comply with the Project standards. Agreements for the removal of wastewater accumulated in septic tanks should be finalised. These agreements should include the designated disposal locations and the treatment capacities of the facilities where the wastewater will be transported. A schematic / map for the drainage network, including locations of discharge, should be developed and kept up to date for each Project facility. 	Mitigation of Project impacts associated with wastewater management.	IFC PS3, EP4	EPC, reviewed by SPV	Immediately	<p>Wastewater treatment plant permits</p> <p>Agreements for removal of wastewater from septic tanks</p>

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	A detailed maintenance program for WWTP should be developed and implemented.					
3.6	<p>Noise and Vibration Management Plan</p> <p>The Noise and Vibration Management Plan should be updated considering:</p> <ul style="list-style-type: none"> The Plan should require monthly noise level measurements to be carried out in the neighbourhoods located within active construction zones during construction phase. During blasting activities, vibration measurement studies should be performed for frequency ranges on the closest receptors and vibration sensitive structures to the blasting locations. Within this regard, the nearest receptors and vibration sensitive structures to the blasting locations should be identified at the site prior to the blasting activities. Site specific mitigation measures such as installation of noise barriers should be included. 	Mitigation of Project impacts associated with noise and vibration.	IFC PS3 EP4	EPC, reviewed by SPV	Immediately	Updated Noise and Vibration Management Plan
3.7	<p>Pesticides Management</p> <p>Information on pesticides should be provided and an assessment of the impact of pesticides conducted.</p> <p>Chemical pesticides should be:</p> <ul style="list-style-type: none"> Subject to appropriate controls on procurement and use of these chemicals. Handled, stored, applied, and disposed of in accordance with the Food and Agriculture Organisation's International Code of Conduct on the Distribution and Use of Pesticides or other GIIP. Of a type that are low in human toxicity, are known to be effective against the target species, and have minimal effects on non-target species and the environment. Not of a type in WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous); or 1b (highly hazardous). Packaged in safe containers, clearly labelled for safe and proper use, and have been manufactured by an entity currently licensed by relevant regulatory agencies. Only accessible to personnel with proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly. <p>A Pesticide Management Plan should be developed, or relevant measures should be incorporated into the Hazardous Materials Management Plan.</p>	Effective management of chemical pesticides.	IFC PS3	<p>SPV (assessment of the impact of pesticides)</p> <p>EPC (draft and update relevant management plans)</p>	Immediately	<p>Assessment on the impact of pesticides.</p> <p>Pesticide Management Plan /Updated Hazardous Materials Management Plan</p>
3.8	<p>Management of potential asbestos containing materials</p> <p>Develop and implement a process for the identification of potential asbestos containing materials (ACM) in existing structures that require removal from Project areas.</p>	Compliance with local legislation, IFC PSs, EP3	IFC PS3	EPC	Immediately	Procedure in place or integrated into Hazardous Materials Management Plan
PS4	Community Health, Safety and Security					
4.1	<p>Blasting Management Plan</p> <p>Develop and implement a blasting management plan including:</p> <ul style="list-style-type: none"> Risk assessment; Initial and regular notification processes; and Roles and responsibilities in line with legal requirements. 	Minimisation of community health and safety risks and impacts.	IFC PS4	EPC	Prior to FC and any blasting activity.	Updated SPV plans/ EPC procedures

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
4.2	Emergency Preparedness and Response (Construction phase) The EPRP should: <ul style="list-style-type: none"> Identify potential incident scenarios and procedures for response. Provide details of emergency equipment, such as fire extinguishers, smoke detectors, and first-aid kits, etc. should be inspected periodically and be replaced if expired throughout the construction and the operation phases. Provide details of evacuation routes and designated meeting points. Provide details of emergency response team. Allocate sufficient resources for emergency response and first-aid. 	Improved health and safety performance and safe working environment for workforce (permanent & contract/contractor & sub-contractor). Compliance with national legislation	IFC PS1 & 4 IFC ESMS Handbook	SPV EPC Subcontractors	Immediately	Emergency Preparedness and Response Plan - Construction
4.3	Emergency Preparedness and Response (Operation phase) The EPRP should: <ul style="list-style-type: none"> Identify potential incident scenarios and procedures for response. Provide details of emergency equipment, such as fire extinguishers, smoke detectors, and first-aid kits, etc. should be inspected periodically and be replaced if expired throughout the construction and the operation phases. Provide details of evacuation routes and designated meeting points. Provide details of emergency response team. Allocate sufficient resources for emergency response and first-aid. 	Improved health and safety performance and safe working environment for workforce (permanent & contract/contractor & sub-contractor). Compliance with national legislation	IFC PS1 & 4 IFC ESMS Handbook	O&M contractor / SPV	At least six months prior to operation commencing	Emergency Preparedness and Response Plan - Operation
4.4	Gender Action Plan Develop a Gender Action Plan that includes site-specific actions to prevent GBVH risks and improve women's employability across the different Project components and specifies monitoring and performance indicators.	Manage gender related risks and impacts and promote opportunities for gender equality.	Best practice	SPV	Prior to first disbursement	Gender Action Plan developed.
4.5	Road Safety Program Develop a comprehensive Road Safety Program that includes: <ul style="list-style-type: none"> Soft interventions, such as but not limited to, awareness campaigns, training sessions for drivers and road users, schools, and community engagement activities to promote safe behaviour. Hard interventions such as installation of appropriate signage, road barriers, lighting, and traffic control measures and safety shelters. 	Promote community health and safety.	Best practice	SPV	Prior to first disbursement and implemented throughout construction and operation	Road safety programme developed. Road safety programme implementation.
4.6	Security Management Plan EPC contractor to update and implement the Security Management Plan compliant with the Voluntary Principles on Security and Human rights in line with lender requirements, maintaining training records and signed copies of the Code of Conduct.	Minimisation of community health and safety and gender risks.	IFC PS4 International best practice on Voluntary Principles on Security and Human Rights	EPC (reviewed and approved by SPV)	Background checks and vetting prior to onboarding security provider Security management plan to be implemented throughout construction	Final security management plan. Signed CoC by security personnel and training records.

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
4.7	Infrastructure Safety Engage suitably qualified technical specialists to review the design and traffic control measures to validate their adequacy.	Minimisation of community health and safety risks	IFC PS4	SPV	Immediately	Confirmed review of design and traffic control measures.
PS5	Land Acquisition and Involuntary Resettlement					
5.1	Finalise RAP With engagement of a qualified third-party RAP expert to review and enhance the RAP. Ensure RAP is reviewed and approved by KGM. The approved final RAP should include at the minimum: <ul style="list-style-type: none"> Revised entitlement matrix that is realistic and applicable; All measures ensuring full replacement cost for all affected structures; Completed user verification and mapping; Expanded and validated PAP database; Clarified and formalised eviction and relocation procedures; Addressed tenure insecurity and inheritance gaps; Business-specific livelihood restoration plans; Further assessments on the 31 indirectly affected businesses; Extend RAP budget and include contingencies; Incorporate measures to ensure timely relocation of public infrastructure; A detailed parcel-level Cumulative Impact Assessment; Livelihood restoration plan that incorporates household-specific cumulative impact mitigation measures; A structured assessment of vulnerable employees in affected businesses, including those in informal or casual arrangements, and establish support plans accordingly; Clarification of retroactive application of the cut-off date and address how affected persons will be informed, especially those absent during inventory; Exit criteria for ending or modifying vulnerability support, based on clear needs-based indicators and agreed in consultation with affected households; Strengthened grievance redress for disputed tenure, and vulnerable groups, including designated focal points, and mobile or home-based complaint intake options; Extended RAP budget to cover full RAP implementation period and to reflect updates made in entitlement matrix; and Budget allocated for anticipated cumulative impacts. 	Management of land acquisition and resettlement risks through a formalised documents and system	IFC PS5 EP4	RAP Consultant and SPV responsible for finalising RAP. Qualified RAP expert to be engaged by SPV. KGM to review and endorse final RAP	Prior to FC	Final RAP with annexes KGM approval of RAP
5.2	Develop a RAP Implementation Procedure. Ensure -to the minimum- the procedure: <ul style="list-style-type: none"> Details criteria for utilisation of RAP Fund and sets responsibilities, Formalises inter-agency coordination and operationalise RAP Fund disbursement processes with clear roles and responsibilities, 	Management of land acquisition and resettlement risks through a formalised documents and system.	IFC PS5 EP4	SPV with the support of RAP Consultant	September 2025 prior to RAP finalisation	RAP Implementation Procedure

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	<ul style="list-style-type: none"> Defines, and operationalises tools and documents such as PAP database, vulnerability scoring tools, and develop a cumulative impacts register for coordination. Monitors and integrates overlapping project impacts in the RAP database. 					
5.3	<p>Mobilize a RAP implementation team</p> <p>Mobilize a RAP implementation team under SPV with internal and/or external experts. Ensure the team's active involvement in finalizing the RAP. The RAP implementation team to at a minimum:</p> <ul style="list-style-type: none"> Implement, monitor and report on RAP implementation progress against national law and lender requirements, Manage and disburse RAP Fund Coordinate with KGM and other relevant counterparts Plan and conduct internal training including training of CLOs to support vulnerable groups using standard protocols Implement LRP programs Coordinate procurement of external consultants Support independent and external audits carried out by third parties 	Improved social performance through strengthened internal capacity	IFC PS5 EP4	SPV	September 2025 prior to RAP finalisation	<p>Evidence of appointment Specialist CVs</p> <p>Updated organogram with indication of members of RAP implementation team</p> <p>Training records</p>
5.4	<p>Execute RAP</p> <p>Maintain and implement the approved RAP with the RAP Implementation team in coordination with KGM. Ensure RAP execution includes:</p> <ul style="list-style-type: none"> Completion of land acquisition and timely compensation by KGM and SPV in accordance with the RAP and RAP Fund procedures. Holding regular coordination meetings between KGM, SPV, EPC, and the RAP consultant to monitor land acquisition and support measures. Updating land, asset, and crop valuations at least annually to reflect market rates and ensure payment of full replacement cost. Confirming secured budgets with KGM for their own operations and disbursement schedules for compensation payments and RAP measures, with contingency planning for high-cost segments. 	Management of land acquisition and resettlement risks through a formalised documents and system.	IFC PS5, EP4	SPV	Immediate once final RAP is approved and continuous	<p>Approved RAP and RAP budget.</p> <p>RAP Implementation Procedure.</p> <p>Internal and external RAP monitoring reports.</p> <p>Payment /RAP Fund disbursement records</p> <p>Meeting minutes with KGM</p> <p>Updated valuation Study (each year).</p>
5.5	<p>Update the Entitlement Matrix</p> <p>To include provisions that ensure:</p> <ul style="list-style-type: none"> All valuations reflect full replacement cost (excluding depreciation or salvage deductions); Agent and transaction fees are based on final compensation, not depreciated values; Rental assistance is updated using real market data, not assumptions; Rental support for businesses is increased and extended to reflect long-term commercial leases; Compensation is disbursed within 15 days of KGM's fund deposit, regardless of court delays; The unfeasible commitment to help greenhouse owners find new land is removed; 	Management of land acquisition and resettlement risks through a formalised documents and system	IFC PS5 EP4	SPV with the support of RAP Consultant	September 2025 prior to RAP finalisation	Approved RAP including updated Entitlement Matrix

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
	<ul style="list-style-type: none"> Flexible eligibility pathways for informal and vulnerable users are established; Income-based valuation for orchards and high-value crops are completed and applied; and Upfront or lump-sum assistance for vulnerable PAPs instead of reimbursement is provided. 					
5.6	<p>Temporarily restrict land access and construction appropriately</p> <p>Restrict land access and construction to user-free public land with secured permits until RAP implementation readiness is confirmed and establish an internal audit mechanism to verify compliance prior to access.</p> <p>Suspend land entry on all privately owned and public land (requiring permits) until:</p> <ul style="list-style-type: none"> Legal expropriation is finalised (under Article 8/10/27), RAP compensation (including top-ups) is fully paid impacted groups (including informal and vulnerable), Forestry or public land use permits are obtained. 	Prevention / minimisation of land acquisition impacts.	IFC PS5 EP4 GIIP	EPC and SPV responsible for monitoring and restriction enforcement; validated by RAP Consultant and IESC	Immediate and continuous. Reviewed prior to access of each construction zone	<p>Land entry protocols</p> <p>Land access readiness checks.</p> <p>Regular RAP implementation monitoring reports (internal and external)</p> <p>IESC monitoring reports</p>
5.7	Establish and implement a land access monitoring and control mechanism to ensure compliance with displacement minimisation commitments.	Effective management and monitoring of displacement minimisation	IFC PS5 EP4 GIIP	SPV social and expropriation teams to develop a land access tracking register with support from the EPC contractor and CLOs.	September 2025	<p>Land entry protocols</p> <p>Evidence of compensation payments</p> <p>Consent letters</p> <p>Incident records indicating early land access.</p> <p>RAP implementation monitoring reports (internal and external)</p>
5.8	<p>Disclose land acquisition corridor</p> <p>Finalise and disclose updated land acquisition corridor and associated facility footprints (if any).</p>	Effective management of community expectations through a formalised system	IFC PS1 and PS5 EP4 GIIP	SPV to lead. RAP implementation team, expropriation manager and GIS team to prepare updated footprint maps and tables.	August 2025	<p>Final map and table of land acquisition corridor.</p> <p>Evidence of disclosure.</p>
5.9	<p>Align expropriation and construction activities</p> <p>Ensure alignment of expropriation and construction schedules with RAP and LRP Implementation.</p>	Management of land acquisition and resettlement risks through a formalised documents and system	IFC PS5 EP4	SPV in coordination with KGM and EPC	Immediate once final RAP is approved and continuous	<p>Expropriation schedule</p> <p>Construction schedule</p> <p>RAP implementation schedule</p> <p>KGM land acquisition records</p> <p>Regular RAP implementation monitoring reports (internal and external)</p>

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
5.10	<i>Finalise permits and approvals</i> Accelerate finalisation of forestry permits and other relevant approvals, particularly for sites where mobilisation is pending or urgent.	Prevention / minimisation of land acquisition impacts.	IFC PS5 EP4	SPV to supervise and monitor, EPC to obtain and follow-up.	Immediate and prior to any land access granted	Permit register Land entry protocols Land access readiness checks.
5.11	<i>Conduct a Land Access Compliance Audit</i> Conduct Rapid Land Access Compliance Audit (covering November 2024 to end of July 2025) to confirm whether any construction has occurred on land without completed expropriation or required permits. Audit to include a corrective action plan if any gaps or non-compliances identified.	Management of land acquisition and resettlement risks and non-compliance with national law and lender requirements.	IFC PS5 EP4	SPV with the support of RAP Consultant	September 2025	Rapid Land Access Compliance Audit
5.12	<i>Prepare a Guide to Land Acquisition and Compensation</i> Prepare and disseminate Guide to Land Acquisition and Compensation (GLAC) to impacted communities and businesses.	Increased awareness on Project benefits through diversified engagement tools.	IFC PS1 and PS5, EP4	SPV to prepare and SPV/EPC to disseminate via support of project CLOs	August 2025	GLAC Availability of GLAC on project website.
5.13	<i>Develop Livelihood Restoration Plan</i> Develop and implement a stand-alone Livelihood Restoration Plan (LRP) based on framework provided in the RAP. Ensure the livelihood restoration measures include: <ul style="list-style-type: none"> ▪ Strengthened mechanisms to identify and compensate informal actors; ▪ Inclusive, accessible training and outreach models; ▪ Diversified and validated livelihood options; ▪ A robust M&E framework; ▪ Accelerated processes for relevant consultants to be commissioned and deployed; and ▪ Improved recognition and support for informal workers. 	Prevention / minimisation of livelihood impacts.	IFC PS5 EP4	SPV and RAP Consultant, with support from external specialist where necessary	January 2026	Approved stand-alone LRP Records and reporting of LRP implementation Grievance logs Regular RAP implementation monitoring reports (internal and external) IESC monitoring reports RAP Completion Audit
5.14	<i>Develop a RAP Monitoring Framework</i> Develop a RAP Monitoring Framework with indicators for physical and economic displacement outcomes, to be reviewed through periodic internal and third-party audits.	Enhanced decision making through formalised monitoring tools	IFC PS5 EP4	SPV and RAP Consultant to develop framework	October 2025	RAP Monitoring Framework Regular RAP implementation monitoring reports (internal and external) RAP Completion Audit
5.15	<i>Obtain KGM recognition of the RAP</i> Obtain formal recognition of the RAP cut-off date from KGM and promptly disclose it in all relevant settlements through official and community-accessible channels, clearly communicating eligibility conditions and non-compensable post-date changes.	Minimisation of eligibility disputes and late claims	IFC PS5 EP4	SPV and KGM; CLOs for dissemination	Immediate in all areas with completed inventories.	KGM approval of cut-off dates. Evidence of public disclosure.

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
5.16	<p>Promote the Grievance Mechanism</p> <p>Strengthen and promote the Grievance Mechanism (GM) by integrating it across stakeholder engagement tools and ensuring tailored outreach to vulnerable and remote populations. Include practical demonstrations in public meetings and ensure GM visibility in all project materials.</p>	Minimisation of grievances pertaining to land acquisition and resettlement through effective communication	IFC PS5 EP4	SPV and KGM; CLOs for dissemination	Immediate	<p>Outreach activities conducted</p> <p>Materials that include project GM distributed</p> <p>Public demonstrations completed</p> <p>Grievance logs</p> <p>Engagement logs</p>
5.17	<p>Appoint an independent reviewer</p> <p>Enhance GM governance and integration by appointing an independent reviewer, clarifying the appeals process (scope, triggers, and timelines), and linking grievance trends to RAP/LRP monitoring systems.</p>	Avoidance and minimisation of reputational risks and risks related to mistrust, unresolved grievances and poor outcome tracking.	IFC PS5 EP4	SPV	November 2025	<p>Independent reviewer appointed</p> <p>Recorded appeals process</p> <p>Grievance log that disaggregates data on land acquisition.</p>
PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	<p>Biodiversity Management Plan</p> <p>The BMP should be updated to include:</p> <ul style="list-style-type: none"> More detail on how the prescribed actions will be delivered such that there is confidence in their feasibility and effectiveness. More detail on how the mitigation hierarchy has been followed. Information on the number, location and design information for the proposed ecological bridges. Afforestation plans that achieve a five to one replanting ratio of native forests. 	<p>Reputational risks and management associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP</p>	IFC PS6 EP4	SPV	Prior to end-Q4 2025	BMP produced to approval of Lenders
6.2	<p>Biodiversity Action Plan</p> <p>The BAP should focus on mitigation required to achieve compliance for Critical Habitat (and Natural Habitat) in line with the requirements of PS6 and should include sufficient detail to demonstrate feasibility of the actions required to deliver no net loss/net gain as per PS6.</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP</p>	IFC PS6 EP4	SPV	Prior to end-Q4 2025	BAP produced to approval of Lenders
6.3	<p>Critical Habitat Assessment</p> <p>Update CHA to more accurately follow the process as described in GN6, particularly around the various thresholds described under each Critical Habitat criterion. Once complete, the current levels of predicted losses (of both Critical Habitat and Natural Habitat) should be reviewed against PS6 to ensure compliance (specifically regarding application of the mitigation hierarchy and also with the requirements for affecting such habitats).</p> <p>Clarification on the IUCN status of <i>Pyrus serikensis</i> should be provided (including in the chapter).</p> <p>The protected/internationally recognised areas potentially affected by the Project should be considered within the CHA and in greater detail within the impact assessment, including to consider PS6 compliance regarding projects affecting protected areas</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP</p>	IFC PS6 EP4	SPV	Prior to end-Q3 2025	CHA updated to approval of Lenders

No	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
PS8	Cultural Heritage					
8.1	<p>Cultural Heritage Management Plan Update Cultural Heritage Management Plan to:</p> <ul style="list-style-type: none"> Consolidate all current, ongoing and long-term commitments, including an implementation programme and associated budget (estimated, including contingency). Include roles and responsibilities for all aspects of CHMP delivery. Include an outline of cultural heritage awareness training for all site-based contractors. Include constraints mapping / avoidance plans (with buffers) to inform micro-alignment / design (and reflected the C-ESMP). Detail the programmes for ongoing statutory engagement (with ARHB), aligned to Project schedule. Detail all site-specific mitigation (and management) developed in consultation with ARHB to ensure ongoing compliance with Turkish law (1983) and the IFC mitigation hierarchy and application valuation (i.e., 'critical', 'non-replicable') favouring impact avoidance through realignment. Clarified commitments for site-specific monitoring (e.g., in relation to vibration effects). Programmes for ongoing local community engagement (regarding resources access, local festivities, changes to site setting etc), and reflected the SEP. Clear commitments for ongoing baseline survey in specified areas subject to forestry clearance / preparatory works (and not previously surveyed). Defined commitments for pre-construction evaluation (sub-surface testing) works as well as methodologies for construction phase monitoring – in defined location. Associated budgets for CHMP implementation and delivery - contingency budgets that may be required, for example, if archaeological sites are revealed during construction monitoring, or, artefacts encountered accidentally as 'chance finds'. Updated CFP (see ESAP item 8.4). Measures to monitor and update the CHMP throughout the construction phase of the Project. 	<p>Reputational risks and management associated with cultural heritage. Non-compliance with Lender standards</p>	IFC PS8	EPC / Archaeological Consultant	Immediately	Compliant 'site ready' CHMP Related training records for staff induction
8.2	<p>Chance Finds Procedure – Update Project Chance Find Procedure to meet Lender requirements:</p> <ul style="list-style-type: none"> Explicit statement that the CFP only applies in areas of predicted low archaeological sensitivity (and is not a substitute for baseline reconnaissance). Roles and responsibilities, including clarity on who has authority to issue an instruction 'restart' works Clear 'chain of custody' for finds Requirements related to human remains Assurance that in all instances, the avoidance of any further impact, will be the preferred action. 	<p>Reputational risks and management associated with cultural heritage. Non-compliance with Lender standards</p>	IFC PS8 National Legislation	EPC / Archaeological Consultant	Immediately	Compliant 'site ready' CFP Related training records for staff induction