



Kütahya Health Campus Project

Environmental and Social Construction
Monitoring Report - December 2022 Progress

February 2023

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Contents

Executive summary	1
1 Introduction	6
1.1 Background	6
1.2 Scope of Work	6
1.3 Project Description	7
1.3.1 Project Sites and Location	8
2 Environment, Health, Safety and Social Management	11
2.1 Management, Monitoring and Reporting	11
2.1.1 Environmental and Social Management System	11
2.1.2 Environmental and Social Monitoring and Reporting	11
2.1.3 Environmental and Social Organisational Capacity	11
2.1.4 Subcontractor Management	12
2.1.5 Training	13
2.1.6 Permitting	14
2.2 Occupational Health and Safety (OHS)	14
2.2.1 Site Observations	14
2.2.2 Accidents	15
2.2.3 Meetings	17
2.2.4 Site Inspections and Audits	17
2.2.5 Periodic Equipment and Machinery Inspections	18
2.2.6 Method Statements	19
2.2.7 Work Permit	19
2.2.8 Risk Assessment	19
2.2.9 Emergency Response and Drills	20
2.2.10 Hazardous Material Storage	20
2.2.11 Industrial Hygiene	20
2.2.12 Traffic	21
2.3 Labour Management	21
2.3.1 Workers' Accommodation	22
2.3.2 Worker's Grievance Mechanism	23
2.3.3 Labour Audit	23
2.3.4 Gender Equality and Prevention of Gender Based Violence and Harassment (GBVH)	24
2.4 Community Health, Safety and Security	24
2.5 Stakeholder Engagement and Public Grievances	24
2.6 Environment	25
2.6.1 Site Observations	25
2.6.2 Environmental Meetings, Trainings and Drills	25

2.6.3	Environmental Accidents	26
2.6.4	Water Supply and Water Hygiene	26
2.6.5	Wastewater	27
2.6.6	Waste Management	27
2.6.7	Air Quality	28
2.6.8	Noise	28
2.7	Construction Phase ESAP Status Table	28

A. Site Photos 34

Tables

Table 1-1	General Hospital Progress Table	7
Table 1-2	PTRH Progress Table	7
Table 2-1	Accident Records in Current Period	15
Table 2-2	Types and Numbers of the Inspections and Audits conducted in December 2022	18
Table 2-3	Workers' Grievances List in Current Period	23
Table 2-4:	Stakeholders' Grievances List in Current Period	25
Table 2-5:	Water Use in 2022 including the Current Period	26
Table 2-6:	Construction Phase ESAP Implementation Table	29

Figures

Figure 1-1	Respective Locations of Kutahya General Hospital and PTRH	8
Figure 1-2	Aerial View of General Hospital Construction Site at Kütahya City Center	9
Figure 1-3	Aerial View of Physical Therapy and Rehabilitation Hospital Site in Yoncalı District of Kütahya City	9

Photos

Photo 1	General view from General Hospital Building Construction	34
Photo 2	General view from PTRH Building Construction	34

Executive summary

Mott Mac Donald (MMT) Turkey was contracted to conduct Environmental and Social Due Diligence (ESDD) Study by Dumlupınar Sağlık Hizmetleri A.Ş. (the Project Company) for assessment of Kütahya Health Campus Project (the Project) funded by 'İş Bank', 'Ziraat Bank', 'Industrial and Commercial Bank of China, Turkey (ICBC)', 'Industrial Development Bank of Turkey (TSKB)', and 'Asian Infrastructure Investment Bank (AIIB)'. As a result of the study, a limited number of gaps were identified and the environmental and social issues identified were not considered red flags or high risk.

MMT was engaged by the Project Company to conduct environmental and social (E&S) construction monitoring and E&S operation monitoring studies in order to review compliance of the Project in line with Environmental and Social Action Plan (ESAP), relevant the national and international requirements and construction stage Environmental and Social Management System (ESMS) commitments and required permits. Please review ESAP Status Table in Section 2.7 for implementation status of ESAP item.

This Construction Monitoring Report No. 04 for December 2022 progress has been prepared based on the data received from the Project Company and the EPC Contractor for December 2022 and the information obtained on the MMT's site visit dated 26 January 2023. The document request list provided to Project Company and the EPC Contractor was prepared for the information and documentation belonging to December 2022. Therefore, the information and documentation discussed in this report represents the situation in December 2022. The next monitoring study is planned to be conducted in February 2023 and will be based on the information and documentation for January 2023.

Project Description

The Project consists of a 510-bed capacity General Hospital to be constructed on 149,926 m² land area located in Kütahya city center, and a 100-bed capacity Physical Therapy and Rehabilitation Hospital (PTRH) to be constructed on 31,263m² land area located in the Yoncalı neighbourhood at approximately 16km from the centre of Kütahya.

MMT is informed that, there will be 150 solar panels which generate 801,642 kcal/day heat on the rooftop of the Technical Service Building in General Hospital and 50 solar panels with 232,762 kcal/day heat generation capacity present in the PTRH Building. The generated heat will be used for central heating purposes in the buildings.

According to information obtained from the EPC Contractor average number of workers were 1614 in the Current Period while the peak number of workers were reached to 1957. As of 31 December 2022, a total of 39 subcontractor companies were actively working on site. The Project Company has confirmed that initial construction activities (e.g.: earthworks, site clearance, excavations etc.) have been almost completed; while construction activities associated with the architectural, electrical, mechanical, infrastructure elements of the Project are still on-going. As by the end of December 2022, overall progress completion for the Project was estimated by the EPC Contractor at 72.46%.

Health, Safety and Environmental (HSE) Organizational Capacity

The EPC Contractor has 12 HSE personnel in the Project site which comprises of five B and five C class HS Officers, contracted from the external third-party joint health and safety unit (JHSU), one Environmental Engineer, and one HSE Chief, who is also an A class HS Officer, which reports to the Site Chief. There is also one fulltime HS Officer of subcontractor named Kone Asansör which is responsible for elevator and escalator installation.

Given MMT's observations on the similar construction sites of similar size and magnitude; and given the need for establishing robust site inspection system (detailed in below sections); MMT is in opinion that the number of HS Officers should continue to be increased.

In addition to the HSE personnel, there is a medical team of a medical team of three doctors and one nurse.

Environmental and Social Management System

The ESMS generated specific for the construction phase is in place. ESMS documents have previously reviewed by MMT and found to be in line with IFC Performance Standards. The Traffic Management Plan was updated and please refer Section 2.2.12 for further information. Stakeholder Engagement Plan also needs to be revised based on information detailed in the relevant sections in this Report. An Environmental and Social Management Plan (ESMP) for both construction and operational phase of the Project was prepared by MMT in line with the requirements of the Lenders taking into consideration organisational capacity and published in the project website on 27 December 2022.

Occupational Health and Safety

MMT was provided with the records of accidents that occurred in December 2022 and the 2022-Accident Statistics document updated for December 2022. The types of accidents are fracture, foreign object stuck in eye, burnt, laceration, slip and fall. 21 first aid accidents and eight accidents with medical treatment occurred in December 2022. The number of lost time injuries that occurred in December 2022 was three. The root causes of two accidents were determined as lack of attention and unawareness whereas the root cause of the other accident was not stated in the root cause analysis form. The root cause analysis needs to be handled more comprehensively and the root cause identification process should be indicated in the form. During the site visit on 26 January 2023, EPC Contractor mentioned that they are in the process of improving the root cause analysis forms. The lost time injury that resulted in 30 lost days was due to squeezing a worker's hand between two objects. In addition, there is no recorded near miss notification in the Current Period. During the site visit, the EPC Contractor informed MMT that they recorded near misses in January 2023 and the numbers will be increased in the next monitoring period. Employees should be trained about the near misses and encourage to report near misses. All near misses should be recorded.

Monthly OHS Committee Meeting of the EPC Contractor and all subcontractors with more than 50 employees were held in Current Period. OHS Committee Meeting reports include the discussed topics, actions and their deadlines; however, it is not possible to track the resolution status of these actions. Previous actions and their status should be added to the OHS Committee Meeting records.

In December 2022, eight non-conformities were detected and all of them were closed. Date, responsible subcontractor, description and the close date of the non-conformities were recorded. Non-conformities were about water leakage, equipment maintenance, the risk of falling from scaffolds. MMT is in opinion that the number of non-compliances is quite low considering the time interval. All non-compliances should be recorded and tracked via Non-conformity and Corrective - Preventive Action Follow List even if the non-compliances could be easily closed.

Periodic inspections of work equipment/machinery have been performed. All equipment used by subcontractors are included in the tracking list of periodic maintenance for the equipment and the required period for the maintenance is given in the list. The due dates of equipment's maintenance can be tracked with the list. A periodic maintenance spot check was performed for a crane located at the PTRH construction site as mentioned in the 3rd Construction Monitoring Report. During the site visit conducted on 26 January 2023, the same crane was observed. The

crane's information tag had still the same expired due date, even though its periodic maintenance date was checked during the previous site visit. Equipment's information tags should be kept updated and controls should be done more strictly to prevent misinformation. During the site visit, the periodic maintenance records of fire cabinets were asked; however, the EPC Contractor stated that they do not involve fire cabinets in the Periodic Maintenance Track List. Fire cabinets should be involved in the Periodic Maintenance Track List and periodic maintenance should be done to be in line with the national regulation. Equipment tags should be strictly and regularly inspected during daily walkovers conducted by HS Officers.

Work specific HSE instructions are delivered to workers prior to work. These instructions are signed by workers and kept in their personnel files. The instructions contain information about responsibilities, the application of the machine and related documents. HSE risks, PPE usage, emergency contacts and other measures are explained in the instruction.

A project-specific Permit to Work Procedure has been developed. Work permit records of hot work and working at height, which were arranged weekly, were reviewed during the site visit. It was understood from the sample work permits that the permit forms are not filled work specific. For instance, in the hot work permits for welding work, work specific PPE requirements were not filled correctively. MMT is in the opinion that the work permits are filled inattentively. Work permits need to be handled more carefully.

Risk Assessment includes all working areas and working equipment, work types and emergency situations. The EPC Contractor's risk analyses were prepared in September 2022 and the risk assessment of construction site freight elevator (Alimak) has been updated in December. However, its subcontractors' risk analyses have not been revised in the Current Period. The risk assessments should be revised whenever there is a change in main activity, used material as well as near misses, incidents/accidents occur during the work etc. Thus, it is recommended that risk assessments are revised to reflect the current status of the construction site.

An emergency drill was conducted in June 2022 within the Project. According to national regulation emergency drills must be conducted annually; however, since the number of workers has increased drastically since June 2022, MMT suggests that an emergency drill to be conducted as soon as possible. In December 2022, two spill drills were conducted for EPC Contractor and one subcontractor named Oktaş. The drill reports were reviewed by MMT and further observations are explained in Section 2.6.2.

In the hazardous material storage areas SDSs were provided. Hazardous Material Inventory was reviewed by MMT and it is observed that the document has not been updated since October 2022. Hazardous Material Inventory should be correlated with the updated SDSs and the necessary revisions should be done by the EPC Contractor.

Industrial hygiene measurement such as illumination, thermal comfort, dust exposure, indoor gas exposure and indoor noise and vibration levels were carried out on 22 November 2022 by an accredited laboratory. According to the noise exposure measurements performed alongside the road rolling operator and the construction worker, the results were not in line with national legislation limit which is 87 dBA. According to the vibration exposure measurement report, the results for road rolling operation were not in line with the national legislation limits. All the other measurements were reviewed and found complaint with the national legislation. It was observed that the EPC Contractor did not take any action against the limit exceedances. The corrective actions should be defined and implemented as soon as possible.

Please refer Section 2.2 for further details and the observation related OHS issues and related recommendations.

Environment

Utility water is supplied from municipal water system for both construction sites. Six Water Quality Analysis from municipal water system conducted in December 2022. As recommended by MMT, colour and turbidity parameters are also analysed. The results of measured parameters are in line with the Regulation on Water Intended for Human Consumption limits. The next water quality analyses were planned according to the legislation considering the water consumption amounts.

Wastewater from accommodation compounds, offices, and construction areas at General Hospital and PTRH sites are discharged into the municipal sewage system. 'Wastewater Connection Permit (Atıksu Bağlantı İzni) was obtained for both sites on 4 September 2018 from Kütahya Directorate of Water and Sewage Works granting that the discharge of domestic wastewater from construction sites to the city's sewer network.

The EPC Contractor constructed a temporary waste storage area at both sites. An additional waste storage unit is present at the food production (kitchen) area located in the vicinity of workers' accommodation compound, managed by the sub-contractor for catering services. The wastes were segregated in specific waste streams, as set out in the national legislation. Inside the buildings where the construction is ongoing it was observed that the waste management and housekeeping were good. However, during the site visit, in the accommodation area near the canteen, there was a lot of trash on the floor and the housekeeping was found to be insufficient. Trash bins should be located in the area and waste management should be improved. The IWMP submission letters for PTRH and General Hospital were resubmitted to PDoEUCC on 26 December 2022.

Monthly PM₁₀ and noise monitoring studies are being conducted at six monitoring points. According to Air and Noise Quality Monitoring Report issued in December 2022, PM₁₀ and noise measurement results do not exceed the limit values defined in the Turkish legislation, the IFC limit and EU limits.

Environmental accident did not occur within both construction sites in December 2022. Annual training plan does not include environmental trainings and drills. Environmental training was continue to be given to workers who recently start working on the Project. Workers of five subcontractor companies did not receive environmental training; however, as for the remaining subcontractor companies' workers the training was continued to be given in December 2022.

Labour and Working Conditions and Grievance Mechanism

The number of female employees in December was 57. In December 2022, 3% of women were present in the overall workforce.

During the site visit, MMT conducted a spot check on one employee of subcontractor named Alpha. The subcontractor company made the labour contracts as fixed term contracts, which expired on 31 December 2022, and MMT observed that the subcontractor did not renew its workers' contracts. The EPC Contractor informed MMT that the subcontractor company was in process of renewing the labour contracts. After the site visit, the EPC Contractor provided MMT with the renewed fixed term labour contracts. MMT will check the subcontractors' labour contracts in the next monitoring period.

Construction Camp Management Plan was prepared within the scope of the ESMS. Regular internal audits for accommodation areas are conducted with the participation of HS Officers and HR Chief. According to audit forms submitted in December 2022, heaters in the rooms, no lids for waste bins in the cafeteria, lack of toilet paper, broken faucets in the toilets were recorded. Necessary warnings and notifications were made and according to the audit records, deadlines were given for these mentioned issues and the necessary actions were taken.

During the site visit, MMT observed that in the laundry building, detergents are still not kept in air-tight containers; therefore, the detergent smell was dominant in the building. MMT is in opinion that the ventilation of the building was insufficient. However, the employees stated that during the operation, they stay outside of the building and keep the window open.

Accommodation areas were visited during the site visit. There are twelve rooms, six toilets and six showers in one compound. The number of workers in a room was decreased to 6-7. According to IFC Workers' Accommodation Standards, 4m² to 5.5m² surface area must be available per resident. Since the rooms in the accommodation area are approximately 25m², the density of some rooms is not in line with the IFC Workers' Accommodation Standards. The EPC Contractor informed MMT that they are renting a building to use for the accommodation purposes, so the density of the rooms will be decreased. The condition in the shower area and the toilets were good and necessary renovations were completed. There was liquid soap in the toilets; however, toilet paper was not present.

Regarding grievance mechanism, the EPC Contractor started to record verbal grievances in the Workers' Grievance Track List. However, for the Current Period, verbal grievances could not be tracked via Workers' Grievance Track List. MMT will review the Workers' Grievance Track List in the next monitoring study. Please refer Section 2.3.2. for further details regarding worker's grievance mechanism.

According to the ESAP of the Project, an independent third-party labour audit should be performed annually. Project Company informed MMT that they are in the process of selecting the labour auditor and labour audit will be performed soon. According to grievance records for the Current Period, no GBVH-related complaints were received. MMT will continue to review grievance records in next monitoring periods. MMT is in the opinion that most of the employees were not familiar with GBVH topics and were not educated on the matter. The EPC Contractor personnel should obtain training on handling gender-based violence and harassment cases.

Community Health and Safety

As stated in the construction phase ESAP, Item 4.1; third party fire safety audit has been conducted by technical consultant of the Project Company. The report will be reviewed once it is shared by the Project Company.

Stakeholder Engagement and Public Grievances

A Stakeholder Engagement Plan (SEP) has been established for the construction phase. SEP and grievance forms have been disclosed in the Project website. However, SEP provided in the Project website is in English language. Since SEP is a living document, it needs to be updated. The EPC Contractor informed MMT during the site visit on 26 January 2023, that the SEP is being updated as per recommended in the 3rd Construction Monitoring Report and the revision of SEP is still ongoing.

The stakeholder meeting on 30 December 2022 was conducted with the participants from Çinigar Preschool, Es Thermal Hotel, Kütahya Thermal Hotel, Evliya Çelebi Training and Research Hospital and the Mukhtars of Okmeydanı, Evliya Çelebi, Bahçelievler and Yoncalı Neighborhoods. During the meetings 28 grievances were recorded and all of them were closed.

Total 205 grievances were received from December 2020 to by the end of December 2022. The open traffic, dust and noise related grievances were not closed, and related actions are not seen in the grievance log. It is seen in the Stakeholders' Grievance Track List that the similar grievances were closed. MMT is in the opinion grievance log needs to be reviewed and revised to reflect the current situation. Remaining grievances were closed and information related the grievances were provided to the related persons.

1 Introduction

1.1 Background

Mott MacDonald Turkey (MMT) has been engaged as Lenders' environmental and social advisor by Dumlupınar Sağlık Hizmetleri A.Ş. (the 'Project Company') to support the lenders' due diligence process for the financial close, environmental and social (E&S) construction and E&S operations monitoring of the for Kütahya Health Campus Project (the "Project") in Kütahya.

Consultancy Agreement (the 'Agreement') was signed between Mott MacDonald Turkey and Dumlupınar Sağlık Hizmetleri A.Ş. (the 'Project Company') with the scope of performing E&S monitoring services during the construction phase of the Kütahya Health Campus Project (the 'Project'). The Lenders of the Project are 'İş Bank', 'Ziraat Bank', 'Industrial and Commercial Bank of China, Turkey (ICBC)', 'Industrial Development Bank of Turkey (TSKB)', and 'Asian Infrastructure Investment Bank (AIIB)¹'.

Kütahya Health Campus Project is based on a Public - Private Partnership ("PPP") investment-finance model. The Project Agreement for the 'Construction and Provision of Products and Services for Kütahya Health Campus by PPP Model' was signed on 29 September 2016 between the Turkish Ministry of Health (Grantor) and the Project Company. The Project Company will oversee the design, build, finance, and operation of the Project for a 25-year period.

Güriş İnşaat ve Mühendislik A.Ş. has been appointed as the EPC Contractor, while Kütahya Hastane İşletmeleri Yatırım A.Ş. has been appointed as the Facilities Management Company (FM Co), which will undertake soft FM, hard FM, and will provide medical support services.

Reference framework will be based on health, safety, social and environmental ('HSSE') requirements and standards set out in relevant regulations, IFC Performance Standards (2012), IFC Environmental, Health and Safety (EHS) as well as AIIB's ESSs.

In the Consultancy Agreement signed between MMT and the Project Company; construction monitoring reports will be issued by MMT on a monthly basis until construction activities completed. The Construction Monitoring Report No. 04 ('this Report') covers one-month period, December 2022. Project period of 1 December 2022 – 31 December 2022 will be expressed as "Current Period" within this Report.

1.2 Scope of Work

The scope of work includes an overview of E&S, Health and Safety performance and the extent to which the Project is in compliance with the Lender's Standards, compliance with Equator Principles, IFC EHS Guidelines, national legislation on environmental and health and safety matters, environmental and social control measures implemented by the Project Company and material E&S risks and issues associated with the Project. MMT conducts monthly environmental and social construction monitoring and prepare monitoring report during the construction phase.

The review is based on the observations made during the site visit on 26 January 2023 as well as documents and information provided by Project Company and the EPC Contractor of the Project. The documents and information received until 2 February 2023 have been considered in this Report. The document request list provided to Project Company and the EPC Contractor

¹ Please note that according to the information provided to Mott MacDonald in February 2022, İş Bank and AIIB have been involved in the Project while ESDD study is on-going.

was prepared for the information and documentation belonging to December 2022. Therefore, the information and documentation discussed in this report represents the situation in December 2022. The next monitoring study is planned to be conducted in February 2023 and will be based on the information and documentation for January 2023.

1.3 Project Description

The Project consists of a 510-bed capacity General Hospital to be constructed on 149,926 m² land area located in Kütahya city center, and a 100-bed capacity Physical Therapy and Rehabilitation Hospital (PTRH) to be constructed on 31,263m² land area located in the Yoncali neighbourhood at approximately 16km from the centre of Kütahya.

MMT is informed that, there will be 150 solar panels which generate 801,642 kcal/day heat on the rooftop of the Technical Service Building in General Hospital and 50 solar panels with 232,762 kcal/day heat generation capacity present in the PTRH Building. The generated heat will be used for central heating purposes in the buildings.

According to information obtained from the EPC Contractor average number of workers were 1614 in the Current Period while the peak number of workers reached to 1957. As of 31 December 2022, a total of 39 subcontractor companies were actively working on site. The Project Company has confirmed that initial construction activities (e.g.: earthworks, site clearance, excavations etc.) have been almost completed; while construction activities associated with the architectural, electrical, mechanical, infrastructure elements of the Project are still on-going. As by the end of December 2022, overall progress completion for the Project was estimated by the EPC Contractor at 72.46%. Progress rates of the General Hospital and PTRH construction sites as of 31 December 2022 are provided respectively by the below tables.

Table 1-1 General Hospital Progress Table

Work Description	Progress
CIVIL & STRUCTURAL WORKS	98.44%
ARCHITECTURAL WORKS	75.78%
Partition walls	96.76%
Roof works	98.00%
Door, interior window and fixed furniture works	63.13%
Floor finishes	67.11%
Ceiling finishes	60.99%
Wall finishes	69.35%
FACADE WORKS	97.08%
MECHANICAL WORKS	60.91%
ELECTRICAL WORKS	60.08%
INFRASTRUCTURAL & LANDSCAPING WORKS	59.65%

Source: "Progress table" provided by the EPC Contractor in January 2023.

Table 1-2 PTRH Progress Table

Work Description	Progress
CIVIL & STRUCTURAL WORKS	98.84%
ARCHITECTURAL WORKS	78.86%
Partition walls	97.93%
Roof works	99.00%
Door, interior window and fixed furniture works	76.64%
Floor finishes	69.04%

Work Description	Progress
Ceiling finishes	63.41%
Wall finishes	69.68%
FACADE WORKS	98.92%
MECHANICAL WORKS	84.43%
ELECTRICAL WORKS	70.43%
INFRASTRUCTURAL & LANDSCAPING WORKS	91.11%

Source: "Progress table" provided by the EPC Contractor in January 2023.

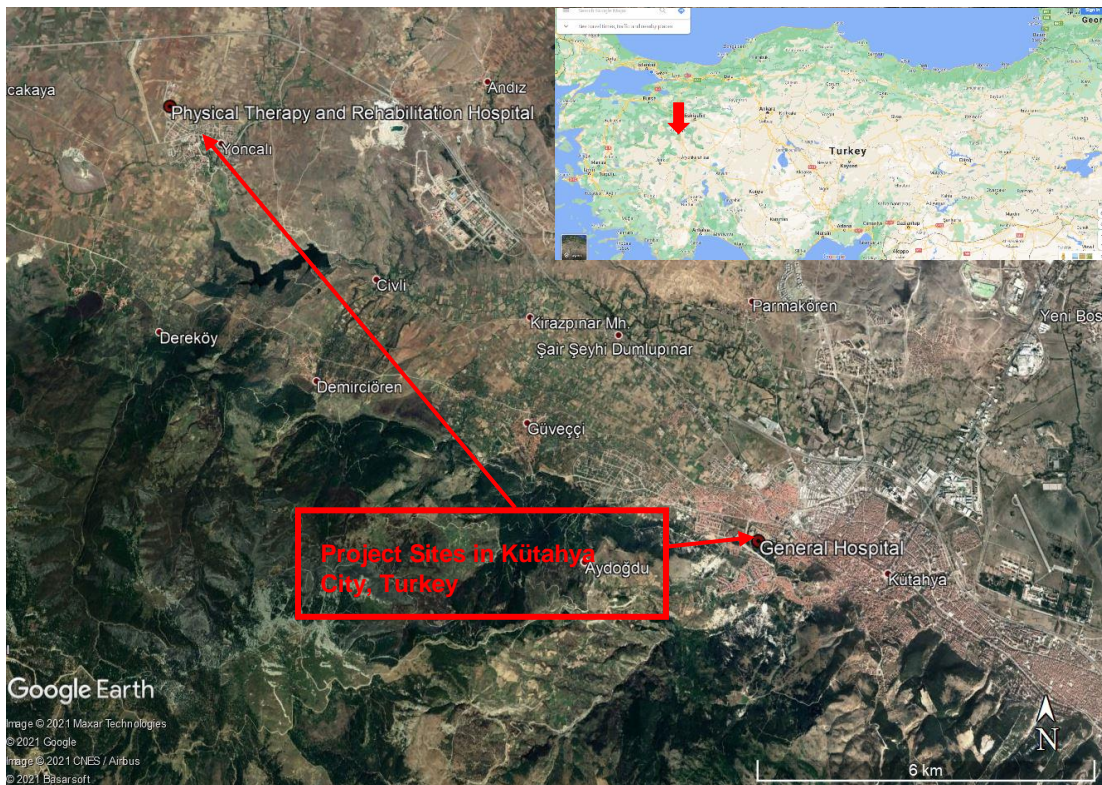
1.3.1 Project Sites and Location

As mentioned above, the 510-bed General Hospital of Kütahya Health Campus Project is being constructed on a 149,926m² footprint area, adjacent to the Evliya Celebi State Hospital in the Kütahya City Center. The 100-bed capacity PTRH is being constructed on a 31,263m² footprint area, in the Yoncalı Neighbourhood, at approximately 16km from the centre of Kütahya.

Kütahya City is situated in the Aegean region, neighbouring Eskişehir, Bursa, Uşak, Manisa, and Afyonkarahisar cities. According to NUTS (Nomenclature of Units for Territorial Statistics), it is placed under Aegean 1 Level, sub-district of Manisa with Afyonkarahisar and Uşak. Kütahya is linked by rail and road with Balıkesir 250km to the west, Konya 450km to the southeast, Eskişehir 70km northeast and Ankara 300km east.

Figure 1-1 below, illustrates the location of the Kütahya Health Campus Project, including the General Hospital and the PTRH, while Figure 1-2 and Figure 1-3. are depicting the respective locations of the General Hospital and PTRH footprint areas and associated neighbouring land use.

Figure 1-1 Respective Locations of Kutahya General Hospital and PTRH



Source: Google Earth – Kütahya Health Campus Project

Figure 1-2 Aerial View of General Hospital Construction Site at Kütahya City Center



Source: Google Earth – Kütahya Health Campus Project

Figure 1-3 Aerial View of Physical Therapy and Rehabilitation Hospital Site in Yoncalı District of Kütahya City



Source: Google Earth – Kütahya Health Campus Project

The General Hospital site is located in the Kütahya city center, which supports principally residential areas and commercial units. The closest neighbouring settlements are Evliya Çelebi to the north at approximately 40-50m, Okmeydanı to the south at approximately 250m and Gültepe to the southeast at approximately 650m distance to the Project site boundaries². The close vicinity of the Project footprint supports housing units, educational facilities, hospital facilities, businesses (pharmacy, supermarket etc.), mosques and recreational areas. Kütahya Anadolu High School and Hekim Sinan Vocational and Technical Anatolian High School are located approximately 100m (to the southeast) and 200m (to the northeast) distance to the Project site boundaries, respectively. Additionally, there are also three mosques which are located at approximately 120m (north), 150m (southeast) and 250m (northeast) distance to the Project site which are also illustrated in Figure 1-2.

The PTRH is located in the Yoncalı Neighbourhood at approximately 16km distance from the centre of Kütahya. The PTRH site is at the outskirts of Yoncalı neighbourhood and is mostly surrounded by vacant plots of lands. The close vicinity of the Project footprint supports mainly several hotels (at approximately 100m to the north, 150m to the southeast and 300m to the southeast of the Project site) and one residential housing complex (at approximately 90m to the west of the Project site). Excavation wastes are being disposed to the designated excavated material storage area at a distance of approximately 6km to the northeast of GH and 14.5km to the east of PTRH. There is not any concrete batching plant to be established in the Project site. The ready-mixed concrete is supplied from Çimsa Concrete Plant which has two operating plants located at approximately 5km distance to the east of PPTH and 27.2km distance to the southeast of PTRH (10km to the northwest and southeast of GH). As reported by the Project Company, concrete is supplied from the two above-mentioned operation plant locations depending on the planning made by the concrete plant.

² The approximate distances regarding to the closest settlements in Gültepe and Okmeydanı neighbourhoods are retrieved from official map from the Kütahya Municipality's website (Last Access on 27.04.2022; <https://www.kutahya.bel.tr:84/keos/>).

2 Environment, Health, Safety and Social Management

2.1 Management, Monitoring and Reporting

2.1.1 Environmental and Social Management System

The Project Company has developed Environmental and Social Management System (ESMS) including project specific plans and procedures to manage and monitor environmental, social and occupational health and safety performance of the construction phase of the Project. The list of ESMS plans and procedures for the construction phase are given in the 1st Environmental and Social Construction Monitoring Report.

In addition, the EPC Contractor is certified under ISO 9001:2015 (Quality Management System), ISO 14001:2015 (Environmental Management System) and ISO 45001 (OHS Management System). Certificates were issued in March and April 2020 and are valid for a three-year period.

The EPC Contractor shared the revised Traffic Management Plan with MMT. Please refer Section 2.2.12 for detailed information regarding TMP. The EPC Contractor informed MMT during site visit on 26 January 2023, that the Stakeholder Engagement Plan (SEP) is being updated as per recommended in the 2nd Construction Monitoring Report.

Recommendation/Conclusion:

- SEP needs to be revised to include recent stakeholder activities as soon as possible. When it is finalized, it needs to be published in Turkish and English in the project website.

2.1.2 Environmental and Social Monitoring and Reporting

The EPC Contractor has developed Project specific ESMS to manage and monitor environmental, social, and health and safety performance assessment. An ESMP for both construction and operational phase of the Project was prepared by MMT in line with the requirements of the Lenders taking into consideration organisational capacity and published in the project website on 27 December 2022. HSE Performance Form contains information about environmental parameters such as noise and PM₁₀ measurements, monthly electricity, gas and water consumptions as recommended in previous Monitoring Reports. In addition to these parameters the EPC Contractor will revise the monthly HSE Performance Forms to include waste types and disposal amounts as recommended by MMT. Revised HSE Performance Forms will be evaluated in the next monitoring period.

The EPC Contractor has a Legislation Track List related to HSE consisting of related laws and legislation and their revision dates. The EPC Contractor also shared an HSE Legal Compliance Track List indicating the current situation, compliance status and necessary actions. During the site visit on 26 January 2023, the EPC Contractor informed MMT that the Legislation Track list applies to all subcontractors and they are checking subcontractors' compliance status with the Legislation Track List.

2.1.3 Environmental and Social Organisational Capacity

MMT's assessment on the Project's organizational capacity on health, safety, environment, and social issues are listed below:

- The EPC Contractor provided an up-to-date HSE organisation chart reflecting the number of HSE I in Current Period. In total, there are 12 HSE personnel in the Project site which comprises of five B and five C class HS Officers contracted from the external third-party joint health and safety unit (JHSU), one Environmental Engineer, and one HSE Chief which reports to the Site Chief. The HSE Chief is also an A class HS Officer. There is also one fulltime HS Officer of subcontractor named Kone Asansör which is responsible for elevator and escalator installation. According to HSE Performance Report, in addition to the HSE personnel, there is a medical team of three doctors, and one nurse.
- One B class and one C class HS Officers are responsible for approximately 300 workers in the PTRH and the remaining 9 HS Officers (one A class, four B class and four C class) are responsible for roughly 1300 workers in the General Hospital.
- The EPC Contractor has Human Resources (HR) management team consists of a HR Chief and three HR personnel. HR Chief is responsible from human resources related issues on site. He is also assigned as Community Liaison Officer (CLO) for the construction phase of the Project who is coordinating the management of external grievances.
- Security team consist of 38 security agents and a Security Team Chief who is reporting to the HR Chief.

Recommendation/Conclusion:

- Although the number of HS Officers are in compliant with the relevant regulation, and the EPC Contractor increased the number of HSE personnel in the Current Period, MMT is of the opinion that the number of HS Officers should continue to be increased, especially considering the number of workers will increase in the upcoming periods. Given MMT's observations on the similar construction sites of similar size and magnitude; and given the need for establishing robust site inspection system (detailed in below sections); MMT recommends increasing the number of HSE team with more experienced personnel to comply with best practices.

2.1.4 Subcontractor Management

The MMT was informed that 39 subcontractors were active on site in December 2022. Template of the subcontractor contract was provided to MMT for review During the site visit on 26 January 2023, MMT reviewed the appendices of the subcontractor contracts and there are references to national labour and occupational health and safety and environmental legislations and ESMS/ESMP.

Subcontractors are evaluated by the EPC contractor according to their working performance. The EPC Contractor stated that they evaluate subcontractors' working performance at the end of their working period to decide whether they meet the standards of working. These forms are used to determine whether to work with the subcontractor in the future. In addition to working performance evaluation, subcontractors are also evaluated according to their HSE performance which only covers health and safety issues. All subcontractors' HSE performance are evaluated monthly. Sample HSE Performance evaluation forms and working performance evaluation forms were reviewed by MMT.

Recommendation/Conclusion:

- Subcontractors should be regularly evaluated in terms of working and HSE performances.
- Environmental performance parameters should be added to HSE performance evaluation forms for subcontractors.

2.1.5 Training

In the annual training plan for 2022, planned HS trainings and drills are seen. However, it is understood that the plan was not updated and environmental trainings and drills were not included in the plan. During the site visit, the EPC Contractor's Environmental Engineer informed MMT that the updated training plan for 2023 containing environmental training and drills is prepared and will be shared with MMT in the next monitoring period.

For compliance with the relevant regulation³, 16-hour training has been given to all employees. According to the monthly HSE Performance Form filled for the Current Period:

- 542 personnel of the EPC Contractor and subcontractors received health and safety trainings.
- Toolbox talks about working at height, fire emergency and PPE use were performed for 237 sub-contractors` workers present on site regarding health and safety issues.

Number of toolbox talks has been increased drastically. MMT will check the toolbox talk numbers in the next site visit.

The EPC Contractor is currently in the process of updating the training content in the 16-hour training presentations to be in line with the national regulation. The draft 16-hour training presentations and participation records were shared with MMT. Revisions in the subjects of legislation, fire, PPE, medical surveillance, occupational diseases, incidents and accidents were started to be made. MMT will monitor the status of the updated 16-hour training presentations in the next monitoring period.

First Aid Training⁴

According to monthly HSE Performance Form, the total number of first aiders (with a valid first aider certificate) was 80 in December 2022. Based on the provided records, it was determined by the MMT that the Project site is still not in compliance with First Aid Regulation (Minimum 196 first aiders should be employed for 1957 average number of workers on site). During the site visit, the EPC Contractor informed MMT that more workers are obtaining first aid trainings and the number of first aiders will increase to be in line with First Aid Regulation. First aider numbers will be checked in the next monitoring by MMT..

Vocational Training

In accordance with the Regulation on Vocational Training of Employees who work at workplaces classified as "dangerous" and "very dangerous", workers at construction works should receive vocational training specific to their work. The EPC Contractor shared the updated employee list representing which employee has vocational competence certificate. Vocational competence certificates are kept by HR Department. During the site visit, the HR Chief informed MMT that they will add the expiry dates of the vocational competence certificates to the log as recommended by MMT. This information is required to identify expired certificates and provide training to workers beforehand. MMT will check the vocational training log in the next monitoring period.

³ According to the Regulation on Health and Safety Training of Employees, 16 hours of health and safety training should be provided to all employees within one year after the commencement of the work in line with the Regulation.

⁴ In accordance with the First Aid Regulation, one certified first aider should be assigned for every ten employees for workplaces classified as "very dangerous".

Recommendation/Conclusion:

- MMT would like to review Training Plan for 2023 including the environmental trainings and drills in the next monitoring study.
- 16-hour Health and Safety trainings should be revised to include all subjects specified in the regulation (i.e., chemical, physical and ergonomic risk factors, manual lifting and carrying, safe use of work equipment, electricity, its hazards, risks and precautions, safety and health signs, occupational health and safety general rules and safety culture, biological and psychosocial risk factors, first aid, etc.)
- First aiders numbers should be increased to be in line with First Aid Regulation.
- The due date of the vocational competence certificates should be monitored and expired training certificates should be renewed.

2.1.6 Permitting

The recent status of the permits and approvals based on the information/responses/documents provided by the Project Company was presented in the 1st Environmental and Social Construction Monitoring Report and no further action is required at this stage regarding permitting.

2.2 Occupational Health and Safety (OHS)

2.2.1 Site Observations

A site visit was conducted on 26 January 2023 covering the construction areas including General Hospital and PTRH construction sites and the workers camp areas with the participation of the EPC Contractor representatives. Please note that most of the construction activities were on-going inside the buildings. Observations made during the site visit are shortly summarized in the below paragraphs:

- Workers at the construction site were observed using hardhats, safety shoes, and gloves as personnel protective equipment (PPE), however there were some workers who were not using any safety glasses/goggles, earplugs/earmuffs and PPEs specific to their work (i.e., safety belts during working at height, face shields during cutting and abrasive works and welding works), although the required equipment was provided. Failure to equip workers with PPE increases the risk of having an injury.
- There were workers who smoke in working areas inside the buildings. Cigarette butts were present in both of the PTRH and General Hospital buildings.
- The EPC Contractor informed that regular scaffold inspections have been performed by the EPC Contractor's HSE Team to identify functioning and non-functioning scaffolds and label them to prevent any possible accident. However, it was observed during the site visit that improper scaffolds were used in the construction site.
- Majority of the stair railings were placed in the General Hospital and PTRH. Sufficient number of fire extinguishers were placed at working areas however, some of the fire extinguishers were not checked within the last month.
- There were a lot of cables lying around in the PTRH building which increases the risk of having an injury due to tripping and falling.
- Painting works were practiced at the 2nd floor of PTRH. It is observed that the paint smell was dominant; however, workers were not using appropriate PPEs such as masks. The ventilation of the building was insufficient.
- There were workers who built a fire inside the PTRH and General Hospital buildings, even though there were diesel construction heaters placed in each floor.

- There were lack of insulation mats under the transformers inside the buildings at General Hospital and PTRH construction sites.
- During the site visit, it was observed that some of the workers performing work at height were not using safety belt and displaying unsafe behaviour.
- At the 2nd floor of the PTRH, a barrier was placed during the working hours when there is no material transfer. After the shift ends, railings were located to prevent any possible accident.
- There was a portable grinding machine left plugged in on the floor at the General Hospital.
- Electric heaters were placed in material storage areas of General Hospital and subcontractors' offices.
- A fuel oil storage tank was placed next to the waste storage area in General Hospital. The spill containment pan under the filling area was rearranged in a way that covers the fuel oil filling area to prevent possible spillage incident.

Recommendation/Conclusion:

- PPE usage should be strictly monitored by the EPC Contractor by performing periodic site inspections.
- Smoking areas in the buildings should be redefined and smoking in the construction area should be prohibited.
- Scaffold should be regularly inspected and the scaffold that are not in use should be removed from site.
- Unusable or fault working equipment in the construction site should be labelled and removed from the area.
- Fire extinguishers should be controlled monthly.
- Cables in the buildings should be reorganised.
- In the places where painting takes place, EPC Contractor must ensure workers are using the appropriate PPEs and ventilation is sufficient.
- EPC Contractor should strictly monitor the fires built by workers.
- Insulation mats should be placed under the transformers inside the buildings at General Hospital and PTRH construction sites.
- Refreshment trainings including working at height should be given to workers who behave unsafely while working at height.
- The EPC Contractor must ensure the barriers and railing are in place when there is no material transfer.
- Work equipment and machines should not be left plugged at working areas. During daily HS walkovers, work equipment in the construction areas should be strictly inspected.
- Electric heaters should be removed from the of General Hospital and subcontractors' offices.

2.2.2 Accidents

Accidents that occurred in December 2022 are presented in Table 2-1. In December 2022, 32 accidents were reported in the HSE Form and the 2022 - Accident Track List.

Table 2-1 Accident Records in Current Period

Accident Date	Accident Type	Lost Day
01.12.2022	First Aid Case	0
02.12.2022	First Aid Case	0
04.12.2022	First Aid Case	0

Accident Date	Accident Type	Lost Day
04.12.2022	First Aid Case	0
07.12.2022	Medical Treatment Case	3
08.12.2022	First Aid Case	0
08.12.2022	First Aid Case	0
08.12.2022	First Aid Case	0
09.12.2022	First Aid Case	0
09.12.2022	First Aid Case	0
13.12.2022	Medical Treatment Case	1
15.12.2022	First Aid Case	0
17.12.2022	First Aid Case	0
17.12.2022	Lost Time Injury	7
20.12.2022	Lost Time Injury	30
21.12.2022	Medical Treatment Case	3
21.12.2022	First Aid Case	0
21.12.2022	First Aid Case	0
23.12.2022	First Aid Case	0
24.12.2022	First Aid Case	0
25.12.2022	First Aid Case	0
26.12.2022	Medical Treatment Case	2
26.12.2022	Medical Treatment Case	1
26.12.2022	Medical Treatment Case	2
27.12.2022	First Aid Case	0
27.12.2022	First Aid Case	0
27.12.2022	First Aid Case	0
28.12.2022	Medical Treatment Case	2
28.12.2022	Medical Treatment Case	2
29.12.2022	First Aid Case	0
29.12.2022	Lost Time Injury	5
29.12.2022	First Aid Case	0

MMT was provided with the records of accidents that occurred in December 2022 and the 2022-Accident Statistics document updated for December 2022. Details of the accidents were provided to MMT for review. According to these records, the types of accidents are fracture, foreign object stuck in eye, burnt, laceration, slip and fall. 21 first aid accidents and eight accidents with medical treatment occurred in December 2022. The number of lost time injuries

that occurred in December 2022 was three. The root causes of two accidents were determined as lack of attention and unawareness whereas the root cause of the other accident was not stated in the root cause analysis form. The root cause analysis needs to be handled more comprehensively and the root cause identification process should be indicated in the form. During the site visit on 26 January 2023, EPC Contractor mentioned that they are in the process of improving the root cause analysis forms. MMT will follow the status of the revisions and review the updated forms once they are provided. The lost time injury that resulted in 30 days was due to squeezing a worker's hand between two objects. Health and safety refresher trainings were provided to the workers upon return to work following the accident. There is no recorded near miss notification in the Current Period. During the site visit, the EPC Contractor informed MMT that they recorded near misses in January 2023 and the numbers will be increased in the next monitoring period. It is important to report and record all near misses.

Recommendation/Conclusion:

- Root cause analysis forms should cover detailed information about root cause finding process and persons involved.
- Employees should be trained about the near misses and encourage to report near misses. All near misses should be recorded.

2.2.3 Meetings⁵

Records of Monthly OHS Committee Meeting of the EPC Contractor which was held on 26 December 2022 were shared with MMT. OHS Committee Meeting reports include the discussed topics, actions and their deadlines; however, it is not possible to track the resolution status of these actions. Previous actions and their status should be added to the OHS Committee Meeting records. As stated in the Regulation on Health and Safety Committees, subcontractors with more than 50 employees should hold separate committee meetings. There were 10 subcontractors with more than 50 employees during Current Period. All of them conducted their separate monthly OHS Committee Meetings and the records for December 2022 are provided to MMT for review.

Recommendation/Conclusion:

- Actions decided during OHS Committee Meetings and their status should be specified in the meeting records.

2.2.4 Site Inspections and Audits

Regular HSE site inspections and controls were conducted in the Current Period, which comprises of daily site walks, weekly inspections, unsafe behaviour /unsafe conditions audits, executive site visits, scaffold controls, electrical equipment control, fire extinguisher controls and occupational hygiene controls.

The number of these inspections and audits provided in HSE Performance Form are provided in the below table. In addition, periodic environmental site walks are conducted. In December 2022, eight non-conformities were detected and all of them were closed. Non-conformities were about water leakage, equipment maintenance, the risk of falling from scaffolds. MMT is still in opinion that the number of non-compliances is quite low considering the time interval and size of the construction work. Date, responsible subcontractor, description and the close date of the non-conformities were recorded in the list. The dates of the accidents, lost days, health and

⁵ In accordance with the Regulation on Health and Safety Committees, monthly health and safety meetings should be held by the HSE Committee with the participation of the EPC Contractor (employer) Representative, Project Coordinator/Manager, Health and Safety Specialists of both the EPC Contractor and the subcontractors, Workplace Doctor, Worker Representatives, Employer Representatives of the subcontractors and a Specialist undertaking works related to human resources, administration or financial.

safety refresher training dates and company names are specified in the list. Also, the reference to the related corrective preventive action report is given.

Table 2-2 Types and Numbers of the Inspections and Audits conducted in December 2022

Type of the Inspections and Audits	Number
Weekly HSE inspections	4
Executive site visits	1
External audit	1
Scaffold controls	31
Mechanical equipment control	4
Electrical equipment control	4
Fire extinguisher control	4
Occupational hygiene control	4
Others	0

Recommendation/Conclusion:

- All non-compliances should be recorded and tracked via Non-conformity and Corrective - Preventive Action Follow List even if the non-compliances could be easily closed.

2.2.5 Periodic Equipment and Machinery Inspections

Periodic Maintenance Track List for the equipment and machineries were provided by the EPC Contractor to MMT for review. All equipment used by subcontractors are included in the tracking list of periodic maintenance for the equipment and the required period for the maintenance is given in the list. The due dates of equipment’s maintenance can be tracked with the list. It was stated by the EPC Contractor, HS Officers regularly conduct on-site inspections to ensure their sub-contractors’ electrical and mechanical equipment have been properly controlled and tagged. During site visit equipment with tags were observed however there were some exceptions. The EPC Contractor stated that sometimes workers are removing the labels.

Fire Extinguisher Track List containing information about location, number and the type of fire extinguishers in PTRH and General Hospital were provided to MMT for review. In addition, Fire Extinguisher Control List was reviewed by MMT and the records were found to be disorganised. There were fire extinguishers with expired control date. The periodic controls should be done regularly.

During the site visit, the periodic maintenance records of fire cabinets were asked; however, the EPC Contractor stated that they do not involve fire cabinets in the Periodic Maintenance Track List. According to Regulation on Health and Safety Requirements for the Use of Work Equipment, fire extinguishing systems including fire water tanks, fire pumping stations and fire cabinets must be monitored annually.

A periodic maintenance spot check was performed for a crane located at the PTRH construction site as mentioned in the 3rd Construction Monitoring Report. During the site visit conducted on 26 January 2023, the same crane was observed. The crane’s information tag had still the same expired due date, even though its periodic maintenance date was checked during the previous

site visit. Equipment's information tags should be kept updated and controls should be done more strictly to prevent misinformation.

Recommendation/Conclusion:

- Equipment tags should be strictly and regularly inspected during daily walkovers conducted by HS Officers.
- Fire cabinets should be involved in the Periodic Maintenance Track List and periodic maintenance should be done to be in line with the national legislation.
- Maintenance of fire extinguishers should be done periodically.

2.2.6 Method Statements

Construction method statements and method statements prepared by the EPC contractor do not include HSE related measures to be taken during subject works. However, the EPC Contractor stated that the work specific HSE instructions are delivered to workers prior to work. These instructions are signed by workers and kept in their personnel files. The instructions for the concrete finishing, iron cutting and bending machines were shared with MMT. The instructions contain information about responsibilities, the application of the machine and related documents. HSE risks, PPE usage, emergency contacts and other measures are explained in the instruction.

Recommendation/Conclusion:

- Health, safety and environmental related measures should also be included method statements.

2.2.7 Work Permit

A project-specific Permit to Work Procedure has been developed. Work permit records of hot work and working at height, which were arranged weekly, were reviewed during the site visit. It was understood from the sample work permits that the permit forms are not filled work specific. For instance, in the hot work permits for welding work, work specific PPE requirements were not filled correctively. In addition, the work permit records are only kept in the offices and tracked via excel sheet. It is not possible to check work permits on site. Work permit system needs to be improved.

Recommendation/Conclusion:

- The written work permit logs with two copies should be prepared, and one copy should always be present on site. This will enable to have an effective work permit system.
- Work permits need to be prepared specific to the work conducted.

2.2.8 Risk Assessment

Detailed Risk Assessments of the EPC Contractor and its subcontractors were prepared by the HS Officer contracted from safety unit (JHSU) which provide service to the EPC Contractor and its subcontractors except Kone Asansor which also has one fulltime HS Officer. Risk Assessment includes all working areas and working equipment, work types and emergency situations. The EPC Contractor's risk analyses were prepared in September 2022. The risk assessment of construction site freight elevator (Alimak) has been updated in December 2022. However, its subcontractors' risk analyses have not been revised in the Current Period.

Recommendation/Conclusion:

- The risk assessments should be revised whenever there is a change in main activity, used material as well as near misses, incidents/accidents occur during the work etc. Thus, it is recommended that risk assessments are revised to reflect the current status of the construction site.

2.2.9 Emergency Response and Drills

A project-specific Emergency Response Plan (ERP) has been developed and the latest version was issued on 6 October 2021 which is valid for two years. The Plan was prepared in accordance with the Regulation on Protection of Buildings from Fire, Regulation on Emergency Situations and found to be compliant with the national and international standards.

An emergency drill was conducted in June 2022 within the Project. According to national regulation emergency drills must be conducted annually; however, since the number of workers has increased drastically since June 2022, MMT suggests that an emergency drill to be conducted as soon as possible. The EPC Contractor's training and drill plan belonging to 2023 will be reviewed considering the emergency drills in the next monitoring period.

In December 2022, two spill drills were conducted for EPC Contractor and one subcontractor named Oktaş. The drill reports were reviewed by MMT and further observations are explained in Section 2.6.2.

Recommendation/Conclusion:

- Project-specific Emergency Response Plan should be shared with authorities and neighbourhood communities at the Project website and revised when construction works accelerates.
- In order to implement best practices and to satisfy international health and safety requirements, the MMT recommends frequent fire, search & rescue drills should be conducted during construction phase.

2.2.10 Hazardous Material Storage

As part of project specific ESMS, Hazardous Materials Management Plan was developed. In the hazardous material storage areas, eye showers and spill kits were present. During the site visit, it was observed that the smoke detectors were placed in the hazardous material storage area as recommended by MMT. In the hazardous material storage areas SDSs were provided. Hazardous Material Inventory was reviewed by MMT, and it is observed that the document has not been updated since October 2022. Hazardous Material Inventory should be correlated with the updated SDSs and the necessary revisions should be done by the EPC Contractor. MMT will review the Hazardous Material Inventory in the next monitoring period.

Recommendation/Conclusion:

- SDSs should be present in the construction areas where the chemicals are used.
- During daily HS walkovers, hazardous material management in the construction areas should be strictly inspected.
- Hazardous Material Inventory should be reviewed and updated by the EPC Contractor.

2.2.11 Industrial Hygiene

Industrial hygiene measurement such as illumination, thermal comfort, dust exposure, indoor gas exposure and indoor noise and vibration levels were carried out on 22 November 2022 by an accredited laboratory. According to the noise exposure measurements performed alongside the road rolling operator and the construction worker, the results were 94.8 and 89.1 dBA

respectively. The results were not in line with national legislation limit which is 87 dBA. According to the vibration exposure measurement report, the results for road rolling operation were 2.71 m/s² which is not in line with the national legislation limits. All the other measurements were reviewed and found complaint with the national legislation.

During the site visit on 26 January 2023, it was observed that the EPC Contractor did not take any action against the limit exceedances.

Recommendation/Conclusion:

- The Project Company should ensure that corrective actions for the exceedance in noise and vibration exposure should be defined and taken in a timely manner.

2.2.12 Traffic

A Traffic Management Plan (TMP) has been developed for the Project and it is updated as recommended by MMT and found sufficient. The revised TMP includes speed limits specific to the type of vehicle, site specific route management, possible traffic impacts and their mitigation methods. However, road map and interaction with the community topics were not clearly mentioned in the plan.

No traffic accident occurred in both construction sites during Current Period. The traffic management in both sites are in good condition. Pedestrian walkovers were defined, and pavement constructions were completed. Pedestrian walkover signs were detectable and they lead pedestrians to pavements. The speed limit signs were present on site. However, there was still no flagman on site.

Recommendation/Conclusion:

- Including road map and interaction with the communities in the TMP is recommended.
- Drivers should be regularly trained regarding traffic safety.

2.3 Labour Management

Project Company has Human Resources and Human Rights Policies for the construction phase of the Project. In addition, the EPC Contractor also has Human Resources Policy, Human Rights Policy, Anti-bribery and Anti-corruption Policy, Anti-harassment, Violence and Discrimination Policy. Also, an Employment and Procurement Management Plan was established by the Project Company for the construction phase.

The EPC Contractor has Human Resources (HR) management team which is responsible for labour management on construction site (i.e., employee database, timekeeping, overtime, payment, recruitment, vocational trainings). The team consists of a HR Chief and three HR personnel.

During the site visit on 26 January 2023, MMT conducted a spot check on one employee of subcontractor named Alpha. The subcontractor company made the labour contracts as fixed term contracts, which expired on 31 December 2022, and MMT observed that the subcontractor did not renew its workers' contracts. The EPC Contractor informed MMT that the subcontractor company was in process of renewing the labour contracts. After the site visit, the EPC Contractor provided MMT with the renewed fixed term labour contracts. MMT will check the subcontractors' labour contracts in the next monitoring period.

The number of female employees in December was 57. In December 2022, 3% of women were present in the overall workforce. The number of men working on the project is increasing during the construction period. Project Company and the EPC Contractor work with women employees in many suitable jobs in order to increase women employment.

According to Article 30 of the Labour Law No. 4857, employers with 50 or more employees are obliged to employ 3% disabled workers in the works which are suitable for their occupational, physical and mental conditions. The EPC Contractor and 10 subcontractor companies have more than 50 employees. According to provided information, the EPC Contractor and 10 subcontractor companies are not in-compliance with the national legislation in terms of employment of disabled personnel. However, during the site visit MMT informed the EPC Contractor that numbers of disabled workers are not in line with the national regulation and more disabled workers should be employed. The EPC Contractor stated that they warned the subcontractors to employ disabled workers and they also help the subcontractors to find eligible disabled worker candidates to be employed.

Recommendation/Conclusion:

- Number of disabled workers needs to be in compliance with national regulation for the EPC Contractor and subcontractors with 50 or more employees. The EPC Constructor should monitor the number of disabled workers in subcontractors and ensure they are in line with the Labour Law.

2.3.1 Workers' Accommodation

Construction Camp Management Plan was prepared within the scope of the ESMS. Regular internal audits for accommodation areas are conducted with the participation of HS Officers and HR Chief. According to audit forms submitted in December 2022, heaters in the rooms, no lids for waste bins in the cafeteria, lack of toilet paper, broken faucets in the toilets were recorded. Necessary warnings and notifications were made and according to the audit records, deadlines were given for these mentioned issues and the necessary actions were taken.

During the site visit conducted on 26 January 2023, the EPC Contractor mentioned that the current cafeteria was insufficient for the number of workers in General Hospital; therefore, they will establish an additional cafeteria in the construction site. MMT will visit the new cafeteria in the next site visit.

Laundry building is present in construction site, near accommodation areas. During the site visit, MMT observed that the laundry detergents are still not kept in air-tight containers; therefore, the detergent smell was dominant in the building. MMT is in opinion that the ventilation of the building was insufficient. However, the employees stated that during the operation, they stay outside of the building and keep the window open.

Accommodation areas were visited during the site visit. There are twelve rooms, six toilets and six showers in one compound. The number of workers in a room was decreased to 6-7. According to IFC Workers' Accommodation Standards, 4m² to 5.5m² surface area must be available per resident. Since the rooms in the accommodation area are approximately 25m², the density of some rooms is not in line with the IFC Workers' Accommodation Standards. The EPC Contractor informed MMT that they are renting a building to use for the accommodation purposes, so the density of the rooms will be decreased. MMT will follow the current status of worker accommodation management in the next monitoring studies. The condition in the shower area and the toilets were good and necessary renovations were completed. There was liquid soap in the toilets; however, toilet paper was not present.

Recommendation/Conclusion:

- The number of workers in each room should keep decreasing to be in line with the IFC Workers' Accommodation Standards.
- Detergent in the laundry building should be kept in air-tight containers. Ventilation of the building should be increased with fans.
- Toilet paper should be present in the toilets.

2.3.2 Worker’s Grievance Mechanism

The EPC Contractor’s Grievance Management Procedure is in place. HR Chief who is also CLO of the Project is responsible for the management of workers’ grievance management. However, no training record regarding grievance mechanism is provided. EPC Contractor stated that the updated induction trainings will include the grievance mechanism subject in order to inform all workers about the worker’s grievance mechanism.

According to the Workers’ Grievance Track List, in December 2022, 20 written grievances were received. The subjects and resolution status of the grievances are listed in Table 2-3. Grievances are mainly related with repairment deficiencies, cleaning and hygiene, meal types and mealtimes. All grievances in the Current Period were closed, but there are still eight open items from previous periods. Four of the open grievances from the previous periods are about reopening the canteen and according to the grievance track list the reason of the item cannot be closed is the loss of the previous company. Four remaining grievances are about parking lot problem. In December 2022, there are no open grievances out of 20 received. All of the grievances received in the Current Period have been closed and the related personnel have been informed. The subjects and the resolution status of the grievances are listed in Table 2-3.

Table 2-3 Workers' Grievances List in Current Period

Subject	Number of Grievances	Resolution status
Food and Beverage Services (meal type, mealtime, reopening canteen, water, etc.)	12	Closed: 12 Open: 0
Maintenance (repairing, deficiencies in accommodation areas etc.)	4	Closed: 4 Open :0
Housekeeping (cleaning, hygiene, environmental issues etc.)	4	Closed: 4 Open:0

HR Chief also stated that they received verbal grievances and they take actions for those grievances too and they started to record verbal grievances in the Workers’ Grievance Track List. However, for the Current Period, verbal grievances could not be tracked via Workers’ Grievance Track List. MMT will review the Workers’ Grievance Track List in the next monitoring study.

Recommendation/Conclusion:

- All of the employees should be trained regarding grievance mechanism.
- Verbal grievances should be recorded in Workers’ Grievance Track List.

2.3.3 Labour Audit

According to the ESAP of the Project, an independent third-party labour audit should be performed annually, and this audit should include issues such as contracts, health and safety, worker protection, grievance, worker accommodation, forced and child labour. Project Company informed MMT that they are in the process of selecting the labour auditor and labour audit will be performed soon.

Recommendation/Conclusion:

- An independent third-party labour audit should be performed as soon as possible before construction finishes.

2.3.4 Gender Equality and Prevention of Gender Based Violence and Harassment (GBVH)

The EPC Contractor has Human Rights Policy, Ethical Principles Policy, Fighting Against Assault and Violence and Discrimination Policy which are in line with international standards. According to grievance records for the Current Period, no GBVH-related complaints were received. MMT will continue to review grievance records in next monitoring periods.

MMT is in the opinion that most of the employees were not familiar with GBVH topics and were not educated on the matter.

Recommendation/Conclusion:

- The EPC Contractor personnel should obtain training on handling gender-based violence and harassment cases.

2.4 Community Health, Safety and Security

A project-specific Community Health and Safety Plan (CHSP) in line with IFC PS4 dated July 2019 was prepared for the construction phase of the Project.

A project-specific Security Management Plan has been developed. There are 38 security personnel and one Security Chief who is reporting to HR Chief on site. Since the General Hospital is located in the centre of the city, there is a high level of interaction with community. The EPC Contractor stated that there was no security incident occurred to date. They are in contact with their stakeholders. It was also observed that the Project sites are completely fenced.

Regarding fire safety, it was understood that an audit has been conducted by technical consultant of the Project Company. The report will be reviewed once shared by the Project Company.

Recommendation/Conclusion:

- Although there are security cameras in the project areas, MMT recommends the site walkovers conducted by security personnel to be increased.
- Third party life and fire safety audit report will be shared with MMT once it is completed.

2.5 Stakeholder Engagement and Public Grievances

A Stakeholder Engagement Plan (SEP) has been established for the construction phase. SEP and grievance forms have been disclosed in the Project website. However, SEP provided in the Project website is in English language. Since SEP is a living document, it needs to be updated. The EPC Contractor informed MMT during the site visit on 26 January 2023, that the SEP is being updated as per recommended in the 3rd Construction Monitoring Report and the revision of SEP is still ongoing.

The stakeholder meeting on 30 December 2022 was conducted with the participants from Çinigar Preschool, Es Thermal Hotel, Kütahya Thermal Hotel, Evliya Çelebi Training and Research Hospital and the Mukhtars of Okmeydanı, Evliya Çelebi, Bahçelievler and Yoncalı Neighborhoods. During the meetings grievance forms were distributed to the participants and 28 grievances were recorded.

Table 2-4: Stakeholders' Grievances List in Current Period

Subject	Number of Grievances	Resolution status
Completion of the Construction	25	Closed: 25 Open: 0
Traffic	2	Closed: 2 Open :0
Noise	1	Closed: 1 Open:0

During the site visit on 26 January 2023, Yoncalı Gendarmerie was visited and MMT conducted an interview with the District Gendarmerie Commander. The District Gendarmerie Commander informed MMT that the EPC Contractor has good relations with the community and; therefore, are no grievances received from public and other stakeholders about the Project. The community awaits the Project to be completed. The Project has a positive influence on the city's development such as building new hotel and sport centre projects in Yoncalı. In addition, there will be new employment opportunities in Kütahya with the construction of the PTRH.

Recommendation/Conclusion:

- Since SEP is a living document, MMT recommends that the Project Company updates the SEP (as well as update the stakeholder list to include all stakeholders considering the Project's progress on a regular basis during the lifetime of the Project). MMT will continue to monitor the implementation of SEP within the scope of the construction monitoring studies.
- SEP needs to be translated into local language which is Turkish to be understandable to the community and disclosed in the Project website as soon as possible.
- The Stakeholders' Grievance Track List should be reviewed and updated by the EPC Contractor in order to be coherent.

2.6 Environment

2.6.1 Site Observations

Observations related to environmental management during the site visit conducted on 26 January 2023 and the key risks and associated actions are summarized in the relevant sections below.

2.6.2 Environmental Meetings, Trainings and Drills

Environmental issues are discussed in the HSE Committee meetings. Annual training plan for 2022 does not include environmental trainings and drills. During the site visit, the EPC Contractor's Environmental Engineer informed MMT that the updated training plan for 2023 containing environmental training and drills is prepared and will be shared with MMT in the next monitoring period. Environmental trainings were continued to be given to workers who recently start working on the Project.

Workers of five subcontractor companies did not receive environmental training yet; however, as for the remaining subcontractor companies' workers the trainings were continued to be given in December 2022. The EPC Contractor provided environmental training to five of its employees in December 2022. MMT will regularly check the current status of environmental trainings in the next monitoring periods.

Two spill drills were conducted for EPC Contractor and one subcontractor named Oktaş. EPC Contractor appointed two personnel for spill emergencies. The spill drill reports contain participant list, photos, steps to follow during a spill accident and findings of the drill. According to the report, major findings were the need for training to correctly identify waste types and the absence of chemical bags to dispose of contaminated materials. Corrective and preventive actions were specified in the report; however, deadlines were not defined in the report. MMT would like to be updated about the implementation status of these actions.

Recommendation/Conclusion:

- All employees need to receive environmental trainings as soon as possible.
- The corrective actions defined in the spill drill should be taken.

2.6.3 Environmental Accidents

Environmental accidents are recorded in the monthly HSE Performance Forms. According to provided HSE Performance Forms, it is understood that since the beginning of the construction no environmental accident occurred.

2.6.4 Water Supply and Water Hygiene

Utility water is supplied from municipal water system for both construction sites. Official water network registrations and connections were made for both construction sites on 1 November 2019. MMT was informed that one groundwater well is present at the General Hospital Project site; and no well is present at the PTRH site. The EPC Contractor stated that the well is not currently being used for construction activities and it is only connected to the fire suppression line and will only be used in case of fire. MMT was informed that there is no water meter on the well and it will be installed prior to operational phase. The EPC Contractor provided the water use amount to MMT which is presented in Table 2-5.

Table 2-5: Water Use in 2022 including the Current Period

Date	General Hospital (m ³ /d)	PTRH (m ³ /d)
January 2022	17	4
February 2022	44	8
March 2022	40	15
April 2022	58	32
May 2022	54	18
June 2022	44	25
July 2022	58	29
August 2022	60	44
September 2022	58	25
October 2022	127	47
November 2022	157	44
December 2022	176	44

Six Water Quality Analysis conducted in December 2022 by Kütahya Provincial Directorate of Health Laboratory were provided to MMT. Two measurements were conducted on water dispensers which are located in PTRH, and General Hospital sites and four measurements were conducted on tap water in the accommodation area in PTRH and accommodation area, food preparation area, and tea service area in General Hospital.

The analysed parameters are Escherichia coli, faecal streptococci, coliform bacteria, ammonium, aluminium, iron, conductivity, pH, odour, colour and turbidity. The results are in line

with the Regulation on Water Intended for Human Consumption limits. As recommended by MMT, colour and turbidity parameters are also analysed. The next water quality analyses were planned according to the legislation considering the water consumption amounts presented in Table 2-5. MMT will continue to check the water quality analysis in the next monitoring periods.

Recommendation/Conclusion:

- Water quality analysis should continue to be conducted according to Regulation on Water Intended for Human Consumption considering the water consumption amount.

2.6.5 Wastewater

Wastewater from accommodation compounds, offices, and construction areas at General Hospital and PTRH sites are discharged into the municipal sewage system. 'Wastewater Connection Permit (Atıksu Bağlantı İzni) was obtained for both sites on 4 September 2018 from Kütahya Directorate of Water and Sewage Works granting that the discharge of domestic wastewater from construction sites to the city's sewer network. There is no septic tank in both construction areas.

2.6.6 Waste Management

The Project Company has established a Waste Management Plan (WMP), embedded within the ESMS for the construction phase. In addition, the EPC Contractor has a stand-alone Waste Management Procedure covering site-specific waste management practices. Industrial Waste Management Plan (IWMP) was prepared for the General Hospital and PTRH sites, in line with the Waste Management Regulation (Date/Number: 02.04.2015/29314).

The IWMP submission letters for PTRH and General Hospital were resubmitted to PDoEUCC on 26 December 2022. The letters were provided to MMT for review.

The EPC Contractor constructed a temporary waste storage area at both sites. During the site visit on 26 January 2023, temporary waste storage areas were visited. In the hazardous waste storage area, there were wooden construction materials. Waste separation and storage processes should be conducted with more importance. EPC Contractor should provide environmental training to the cleaning team to prevent lack of knowledge. An additional waste storage unit is present at the food production (kitchen) area located in the vicinity of workers' accommodation compound, managed by the sub-contractor for catering services. The wastes are segregated in specific waste streams, as set out in the national legislation.

Inside the buildings where the construction is ongoing it was observed that the waste management and housekeeping were good. However, during the site visit, in the accommodation area near the canteen, there was a lot of trash on the floor and the housekeeping was found to be insufficient in the General Hospital construction area. Trash bins should be located in the area to reduce the amount of waste on the floor. The EPC Contractor said that there is a cleaning team of 25 workers who are responsible for waste collection and separation, and they are regularly collecting the waste generated in the construction site.

Recommendation/Conclusion:

- Cleaning team should be provided with environmental training which includes hazardous and non-hazardous waste segregation topics.
- Trash bins should be present in the area near the canteen and waste management should be improved.

2.6.7 Air Quality

An Air Quality Management Plan has been developed by the Project Company for the construction phase and embedded within the ESMS. Monthly PM₁₀ monitoring studies are being conducted at six monitoring points and the locations of measurement points were provided in the 1st Environmental and Social Construction Monitoring Report. According to Air and Noise Quality Monitoring Report issued in December 2022, PM₁₀ values which are between 18.2 – 21.8 µg/m³ do not exceed the limit values defined in the Turkish legislation, the IFC limit and EU limits.

2.6.8 Noise

Noise and Vibration Management Plan (NMP) has been developed as part of construction phase ESMS. Monthly ambient noise measurements have been conducted at six measurement locations since 2019 and the locations of measurement points were provided in the 1st Environmental and Social Construction Monitoring Report. According to Air and Noise Quality Monitoring Report issued in December 2022, noise measurements were conducted between 20 – 22 December 2022 (between 12:00 a.m. on 20.12.2022 to 11:45 a.m. on 22.12.2022), for duration of 48 hours, all average measured noise values are below the limit values defined in the Turkish legislation and the IFC limits.

2.7 Construction Phase ESAP Status Table

Implementation status of items in the ESAP for construction phase is given in table below.

Table 2-6: Construction Phase ESAP Implementation Table

KPI Reference	Description of E&S Action	Completion Indicator(s)	Timeframe	Implementation Status
PS1: Assessment and Management of Environmental and Social Risks and Impacts				
ESAP 1.1	<p>ESMS</p> <p>Implementation of the following Project specific procedures/plans:</p> <ul style="list-style-type: none"> ESMS Manual Emergency Preparedness and Response Plan Occupational Health and Safety Plan Security Management Plan Traffic Management Plan Construction Camp Management Plan Employment and Procurement Plan Waste Management Plan Wastewater Management Plan Noise and Vibration Management Plan Air Quality Management Plan Hazardous Materials Management Plan Spill Response Plan Community Health and Safety Plan Resource Efficiency Pollution Prevention Plan Training Management Plan Grievance Mechanism Procedure Supply Chain Management Plan Stakeholder Engagement Plan Chance Find Procedure <p>Maintain organizational structure for the implementation of the ESMS</p>	<ul style="list-style-type: none"> Required documentation as per ESMS and specific plans (such as training records of workers, audit (i.e. audit program) and inspection reports) An established organizational structure and defined roles for ESMS 	During construction phase	<ul style="list-style-type: none"> ESMS plans, procedures and policies have been generated and previously reviewed by MMT. Documents were finalized by the EPC Contractor in line with comments given by MMT. Current ESMS plans are being implemented. Traffic Management Plan is updated as recommended by MMT and found sufficient. Stakeholder Engagement Plan needs to be revised based on information given in the Section 2.1.1. and Section 2.5. There are 12 HSE personnel which consists of ten HS Officers, one Environmental Engineer, and one HSE Chief which reports to the Site Chief. There is also one fulltime HS Officer of one subcontractor. There is a medical team of three doctors and one nurse. The EPC Contractor has HR management team consists of a HR Chief and three HR personnel. HR Chief is also assigned as Community Liaison Officer (CLO) for the construction phase of the Project. <p>For more detailed information please refer to Section 2.1.3.</p>
ESAP 1.2	<p>Permitting</p> <ul style="list-style-type: none"> Obtain all necessary permits/approvals as needed during the construction phase. Establish and maintain a permit register including any permits, licences, no objection certificates, or similar documentation obtained and to be obtained for the Project and associated ancillary construction components or activities, as relevant, encompassing timeframes, responsibilities, expiry date, and relevant E&S requirement to be adhere to 	<ul style="list-style-type: none"> Records of permits, official letters, licenses, approvals, documents and similar Permitting matrix 	During construction phase	<ul style="list-style-type: none"> All necessary permits are secured. A permit register including permits, licences, no objection certificates, or similar documentation has not been established yet.
ESAP 1.3	<p>Construction methods</p> <ul style="list-style-type: none"> Develop documentation for construction methods for each construction activity Develop method statements in line with good international industry practices to manage and monitor construction phase environmental, health and safety and social issues 	<ul style="list-style-type: none"> Construction methods Method statements 	Prior to each construction activity throughout the construction	<ul style="list-style-type: none"> Construction method statements are provided to MMT for review. However, method statements do not include health, safety and environment related measures to be taken. <p>For more detailed information please refer to Section 2.2.6.</p>
PS 2: Labour and Working Conditions				
ESAP 2.1	<p>Human Resources</p> <ul style="list-style-type: none"> Implement Employment and Procurement Plan and HR Policy Issue contracts to workers upon recruitment which include contractual requirements requiring compliance with the Project ESMS, HR Policy, ESAP and other project specific plans and policies as well as setting out working conditions, potential deductions, terms of employment and EHS responsibilities Keep files of all workers that include their work contracts, training records, medical surveillance records, next of kin contact details and similar 	<ul style="list-style-type: none"> Worker contracts Personnel files Database of employees Short quarterly reports available for review by external monitors 	During construction phase	<ul style="list-style-type: none"> The Project Company and the EPC Contractor have established their respective Human Resources Policy. An Employment and Procurement Management Plan was established by the Project Company. The EPC Contractor has also established a Personnel Regulation. The EPC Contractor has Human Rights Policy, Anti-bribery and Anti-corruption Policy, Anti-harassment, Violence and Discrimination Policy dated February 2020. Labour contracts address working conditions in line with the national legislation. Personnel files include work contracts, training records, medical surveillance records, next of kin contact details and similar.

KPI Reference	Description of E&S Action	Completion Indicator(s)	Timeframe	Implementation Status
	<ul style="list-style-type: none"> Develop a database of employees and subcontractor employees that includes information on the age, identity card number, gender, ethnicity, nationality, and hometown. Payroll checks by EPC contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments. 			<ul style="list-style-type: none"> HR Chief of the EPC Contractor performs payment checks each month for subcontractor workers to cross-check working hours and realized payments. <p>For more detailed information please refer to Section 2.3.</p>
ESAP 2.2	<p>Occupational Health and Safety</p> <ul style="list-style-type: none"> Implementation of Occupational Health and Safety Plan Provide necessary trainings to workers Record all accidents and incidents Comply with health and safety legislation applicable to the construction phase of the Project. 	<ul style="list-style-type: none"> Occupational Health and Safety Plan Records of audit reports, regular inspections, trainings for workers and similar Accident and incident logs Non-compliance log to record corrective and preventative actions 	During construction phase	<ul style="list-style-type: none"> Occupational Health and Safety Plan is in place. However, implementation of the plan needs to be improved. Daily site walks, weekly inspections, unsafe behaviour /unsafe conditions audits, executive site visits, scaffold controls, electrical equipment control, fire extinguisher controls and occupational hygiene controls are conducted, and records were provided to MMT. All necessary trainings are provided to workers. Environmental training was continued to be given to workers. MMT will check the status in the next monitoring periods. All accidents, incident and near misses are recorded. First aiders number during the Current Period was not in line with the national legislation. However, MMT is informed that the first aid trainings are provided to employees and the number of first aiders are expected to increase. The status of compliance with the national legislation will be monitored. Non-conformity and Corrective - Preventive Action Follow List has been shared with the MMT for review. In December2022, eight non-conformities were detected and all of them were closed. All non-compliances should be recorded and tracked via Non-conformity and Corrective - Preventive Action Follow List even if the non-compliances could be easily closed. <p>For more detailed information please refer to Section 2.1.5, and Section 2.2.</p>
ESAP 2.3	<p>Worker's grievances</p> <ul style="list-style-type: none"> Publicize the Grievance Mechanism to workers Implementation of the Grievance Mechanism Respond to grievances in a timely manner Implement necessary corrective and preventative actions as required 	<ul style="list-style-type: none"> Grievance log including records of grievances, response to grievances and corrective actions 	During construction phase	<ul style="list-style-type: none"> Grievance forms are publicized to workers. However, no training record regarding grievance mechanism is provided. There is worker's grievance mechanism in place. There are grievance boxes in the workers accommodation areas and the dining halls. Worker's grievance records provided to MMT for review. Responds to grievances are in a timely manner. Verbal grievances should be recorded in Workers' Grievance Track List. The EPC Contractor stated during the site visit on 26 January 2023, they started to record verbal grievances in the Workers' Grievance Track List. MMT will check the records in the next monitoring study. For more detailed information please refer to Section 2.3.2.
ESAP 2.4	<p>Worker's accommodation</p> <ul style="list-style-type: none"> Undertake internal and external (by a third party) regular audits at worker's accommodation facilities Implement Construction Camp Management Plan Maintain the worker accommodation compounds in accordance with the IFC Workers' Accommodation: Processes and Standards 	<ul style="list-style-type: none"> Audit reports/ Inspection records 	During construction phase	<ul style="list-style-type: none"> Regular internal audits at workers accommodation facilities are conducted by the EPC Contractor. Records of the audits are provided to MMT for review. For third party audit please refer to ESAP item number 2.7. <p>For more detailed information please refer to Section 2.3.1.</p>
ESAP 2.5	<p>Subcontractors</p> <ul style="list-style-type: none"> Implementation of Supply Chain Management Plan (Subcontractor Management and Monitoring Plan) that includes checking of subcontractors to verify they are reputable and legitimate enterprises Prepare a subcontractor list Require subcontractors to manage their workers in line with Project's HR policy and adopt grievance mechanism through contractual clauses Require subcontractors to adhere to the Project's EHS policies and plans through contractual clauses. Require subcontractors to report accidents, incidents, and safety non-compliances through contract clauses. 	<ul style="list-style-type: none"> Contracts with subcontractors Subcontractor list Records of subcontractor's accidents, incidents, and non-compliances Subcontractor personnel files Subcontractor training records for EHS Evidence of how workers are informed about the grievance mechanism Grievance log 	During construction phase	<ul style="list-style-type: none"> A Supply Chain Management Plan specific for the construction phase has been produced including supplier selection criteria. In addition, The EPC Contractor established a Subcontractor Management Procedure, which includes assessment of third-party performance; and commitments of subcontractors to comply with the EPC Contractor's environmental, health and safety practices. As of 31 December 2022, 39 subcontractor companies were actively working on site. Copies of the subcontractor personnel files were kept by HR team and reviewed by MMT. Records of subcontractors' trainings were provided to MMT. Grievance logs includes the subcontractors' employees. No evidence of how workers are informed about grievance mechanism was provided to MMT.

KPI Reference	Description of E&S Action	Completion Indicator(s)	Timeframe	Implementation Status
For more detailed information please refer to Section 2.1.4.				
ESAP 2.6	Supply of materials <ul style="list-style-type: none"> Select suppliers as close as possible to the Project site Prepare a supplier list Supply materials from licensed/certificated/permited suppliers/facilities 	<ul style="list-style-type: none"> Records of supply sources Supplier List Licenses/certificates/permits of the suppliers 	During construction phase	<ul style="list-style-type: none"> Supplier list is provided to MMT and supplier licenses are checked during the site visit. The EPC Contractor stated that the suppliers are selected as close as possible to the Project site, however some materials especially for the mechanical ones are supplied from abroad when there is no local suppliers.
ESAP 2.7	Labour Audit <ul style="list-style-type: none"> Carry out annual third-party labour audit for assessment of compliance of the site 	<ul style="list-style-type: none"> Annual third-party audit report 	During construction phase	<ul style="list-style-type: none"> Third party labour audit is not conducted yet. MMT provided information regarding the requirements of the labour audit to the Project Company and Project Company informed MMT that they will initiate the process for the labour audit. MMT will monitor the situation regarding third-party audit in the next monitoring period.
PS3: Resource Efficiency and Pollution Prevention				
ESAP 3.1	Soil, Surface Water and Groundwater <ul style="list-style-type: none"> Adopt good construction site practices for the protection of soil, surface water and groundwater (e.g., storage areas, spillage control, spill kits etc.) Keep spill response kits at designated areas with specific instructions for their use and train site staff on the use of spill kits 	<ul style="list-style-type: none"> Records of periodical site inspections Presence of spill response kits in construction site Records of monitoring of the implementation of the relevant plans Audit and control results, spillage incident records, measurement results, contaminated soil disposal records, training records and similar 	During construction phase	<ul style="list-style-type: none"> Utility water is supplied from municipal water system for both construction sites. One groundwater well is present at the General Hospital Project site; and no well is present at the PTRH site. The well is only connected to the fire suppression line and will only be used in case of fire. Six Water Quality Analysis conducted in December 2022 by an accredited organisation was provided to MMT. According to the analyses, all of the parameters were in line with the national regulation. MMT observed that the number of spill kits and eye showers were enough. two spill drills were conducted for EPC Contractor and one subcontractor named Oktaş. The drill reports were reviewed by MMT. No environmental accident was recorded to date. <p>For more detailed information please refer to Section 2.2.10., 2.6.4. and 2.6.5.</p>
ESAP 3.2	Hazardous materials <ul style="list-style-type: none"> Prepare an inventory of hazardous materials Obtain Safety Data Sheets (SDSs) and provide in relevant locations in both English and Turkish Make Personal Protective Equipment (PPE) available for relevant personnel Train relevant personnel Take required onsite measures Keep hazardous materials at designated areas Locate suitable fire-fighting equipment close to hazardous material storage/usage areas 	<ul style="list-style-type: none"> Records of audits Hazardous material inventory Site inspections Incident records Training records 	During construction phase	<ul style="list-style-type: none"> SDSs are provided in the hazardous material storage areas. However, in the construction areas where the chemicals are used there were no SDSs. SDSs and Hazardous Material Inventory were provided to MMT and it is observed that the Hazardous Material Inventory has not been updated since October 2022. Hazardous Material Inventory should be correlated with the updated SDSs and the necessary revisions should be done by the EPC Contractor. MMT will review the documents in the next monitoring period. Toolbox trainings related hazardous material management and PPE usage are provided to employees. PPEs are provided to all employees. Internal audit and site inspection records were shared with MMT. Fire-fighting equipment are in located close to hazardous material storage/usage areas. <p>For more detailed information please refer to Section 2.2.10.</p>
ESAP 3.3	Waste management <ul style="list-style-type: none"> Implement following plans prepared in the scope of Project's ESMS: <ul style="list-style-type: none"> Waste Management Plan Emergency Preparedness and Response Plan Hazardous Material Management Plan Collect, segregate label and store, transport, recycle wastes in line with the Waste Management Plan Ensure hazardous wastes are properly stored at the designated waste storage area Dispose wastes at licensed facilities according to their category in accordance with regulatory requirements Keep records of waste generation, storage, and disposal Use licensed haulers for the transport of wastes and keep waste transfer certificates Ensure disposal of wastes at licensed facilities Train site workers for waste management practices 	<ul style="list-style-type: none"> Records of periodic site inspections conducted to check all wastes are separately collected, segregated, labelled, and stored in designated areas Disposal records of all types of wastes together with disposal records of excavated soil Waste disposal contracts Licenses of haulers' and disposal facilities' Training record Records of permits, approvals and declarations (i.e., annual waste declaration made to the Ministry of Environment, Urbanization and Climate Change, insurance policies for hazardous waste compulsory financial liability) 	During construction phase	<ul style="list-style-type: none"> The Project Company has established a Waste Management Plan (WMP), embedded within the ESMS for the construction phase and the EPC Contractor has a Waste Management Procedure. Industrial Waste Management Plan (IWMP) was prepared for the General Hospital and PTRH sites, in line with the national legislation. Wastes are collected, segregated, labelled, stored and transported in line with Waste Management Plan. Wastes are disposed at licensed facilities according to their category in accordance with regulatory requirements Environmental training including waste management subjects are started to be provided to workers. For more detailed information please refer to Section 2.6.6.

KPI Reference	Description of E&S Action	Completion Indicator(s)	Timeframe	Implementation Status
	Ensure all required permits, approvals and declarations related to waste management plan are taken			
ESAP 3.4	<p>Wastewater</p> <ul style="list-style-type: none"> Implement Wastewater Management Plan prepared in the scope of Project's ESMS Discharge domestic wastewater to the municipality infrastructure in accordance with the permits and protocols for connection to the municipal sewer system <p>Ensure no industrial wastewater is discharged in the system</p>	<ul style="list-style-type: none"> Municipal sewer system connection approval obtained from the relevant authority 	During construction phase	<ul style="list-style-type: none"> Wastewater Management Plan prepared in the scope of Project's ESMS is being implemented. Wastewater from accommodation compounds, offices, and construction areas at General Hospital and PTRH sites is discharged into the municipal sewage system. 'Wastewater Connection Permit (Atıksu Bağlantı İzni) was obtained for both sites on 4 September 2018 from Kütahya Directorate of Water and Sewage Works granting that the discharge of domestic wastewater from construction sites to the city's sewer network.
ESAP 3.5	<p>Air Emissions (dust, exhaust emissions)</p> <ul style="list-style-type: none"> Undertake air quality measurements for PM₁₀ on a monthly basis at monitoring stations located at the Project's boundary <p>Ensure vehicle inspections are completed regularly for all equipment</p>	<ul style="list-style-type: none"> Records of site inspections Records of air quality monitoring undertaken by a third-party Equipment and vehicle maintenance records Training records of workers and drivers 	During construction phase	<ul style="list-style-type: none"> PM₁₀ measurements on a monthly basis continue and the measurement results for December 2022 are in line with the national and international limits. Equipment and vehicle maintenance records were reviewed during site visit. Environmental training was started to be given to workers who recently start working on the Project. MMT will regularly check the current status of environmental trainings in the next monitoring periods.
ESAP 3.6	<p>Noise</p> <ul style="list-style-type: none"> Undertake monthly noise monitoring on a monthly basis at Project boundary. <p>Obtain consent from Kütahya Provincial Directorate of Environment, Urbanization and Climate Change for undertaking construction activities during night-time (if occurs)</p>	<ul style="list-style-type: none"> Records of site inspections Records of noise monitoring undertaken by a third-party Training records of workers 	During construction phase	<ul style="list-style-type: none"> Monthly noise measurements are being conducted and the measurement results for December 2022 are in line with the national and international limits. Environmental training was continued to be given to workers who recently start working on the Project. MMT will regularly check the current status of environmental trainings in the next monitoring periods. In the Current Period, construction activities during nighttime were not undertaken. The EPC Contractor stated that in the next periods night-time works might be needed and if so, consent from Kutahya PDOEUCC will be obtained
PS 4: Community Health, Safety and Security				
ESAP 4.1	<p>Life and fire safety</p> <ul style="list-style-type: none"> Hire a qualified third-party life and fire safety consultant to review life and fire safety Design the health campus in full compliance with the "Regulation on the Protection of Buildings from Fire" Official Gazette 26735 Date 19.12.2007 A fire expert should be hired for the fire audit of existing offices and accommodation area and a positive confirmation should be secured from the expert in terms of fire safety The third-party life and fire safety consultant shall review the life and fire safety design against Turkish legal requirements as well as NFPA, and shall make recommendations if any significant issues are identified Provide design certification by the above professional to comply with life and fire safety requirements <p>Review of life and fire safety systems during testing and commissioning and certify that construction of life and fire safety system has been carried out in accordance with the accepted design</p>	<ul style="list-style-type: none"> Confirmation for fire safety of offices and accommodation area Third party audit report for Life and Fire Safety Plan Test and commissioning results Post construction life and fire safety certification (ie. Fire Safety Certificate and L&FS Certificate) 	<p>Towards the end of construction phase</p> <p>At the time of commissioning</p>	<ul style="list-style-type: none"> A fire safety audit has been conducted by technical consultant of the Project Company. The report will be reviewed once it is shared by the Project Company. Although fire safety related subjects are inspected under regular internal checks, accommodation and office areas should be separately inspected regarding fire safety.
ESAP 4.2	<p>Community Health and Safety</p> <ul style="list-style-type: none"> Implement Emergency Preparedness and Response Plan (EPRP) and disclose the plan to communities through Project website Update local authorities and communities if there are changes in the EPRP Undertake regular drills/exercises of emergency measures Train workers Document discussion of any identified impacts, risk, and mitigation measures with communities during construction and at least annually in the scope of Environmental and Social Performance Annual Monitoring Report (AMR) Provide road maintenance in case of any physical damage occurs due to the Project activities 	<ul style="list-style-type: none"> Records of audits and regular inspections Sufficient number of traffic signs Training records Evidence of disclosure and updates Records of drills Records of meeting with the communities Records of maintenance activities Requirements for subcontractors 	During construction phase	<ul style="list-style-type: none"> A project-specific Community Health and Safety Plan (CHSP) was prepared for the construction phase and the Plan has been revised based on the MMT's recommendations during ESDD studies to be in line with IFC PS4. A project-specific Emergency Response Plans (ERP) has been developed. However, ERP is not shared in the project website. When construction works accelerates, ERP should be revised and shared with authorities and neighbourhood communities at the Project website. An emergency drill was conducted in June 2022 within the Project. Even though the drills are annual, MMT suggests that another emergency drill should be conducted considering the increase in workers' numbers as compared to June 2022. The EPC Contractor's training and drill plan belonging to 2023 will be reviewed considering the emergency drills in the next monitoring period.

KPI Reference	Description of E&S Action	Completion Indicator(s)	Timeframe	Implementation Status
	Define specific requirements for subcontractors in relation to road safety and speed limits when passing near neighbourhoods			<ul style="list-style-type: none"> 13 emergency drills were performed in 2022. In addition, two spill drills were conducted during the construction phase of the Project to date. Workers are also trained regarding emergency response. Community meetings attendance list and meeting records are kept and shared with MMT for review. AMR has not been prepared yet. MMT informed Lenders and Project Company to decide the period and the format of the Annual E&S Reporting. For more detailed information please refer to Section 2.2.9 and Section 2.4.
ESAP 4.3	<p>Security</p> <ul style="list-style-type: none"> Hire adequate, trained security staff (unarmed) who have not been involved in past security related incidents/abuses <p>Ensure specific training on Human Rights Protection should be provided to security staff</p>	<ul style="list-style-type: none"> Records of audits and inspections Records of credentials of security staff Training records of security staff 	During construction phase	<ul style="list-style-type: none"> There are 38 security personnel and one Security Chief who is reporting to HR Chief on site. All security personnel have relevant certificates. Since the General Hospital is located in the centre of the city, there is a high level of interaction with community. The EPC Contractor stated that there was no security incident occurred to date. They are in contact with their stakeholders. The number of security personnel was found sufficient considering the status of the construction and security management. Internal audits and inspections regarding security were conducted and records were provided to MMT. Credentials of the security staff were reviewed during site visit. No security specific training records were provided.
PS 8: Cultural Heritage				
ESAP 8.1	<p>Chance Finds</p> <ul style="list-style-type: none"> Implement Chance Find Procedure <p>Contact relevant authorities (i.e., Museum Directorate) in case of chance finds</p>	<ul style="list-style-type: none"> Records of chance finds documentation Copies of correspondence with authorities 	During construction phase	<ul style="list-style-type: none"> Chance Find Procedure is generated and in place. It was stated by the Project Company and the EPC Contractor that that no finding has encountered to date.
PS 10: Information Disclosure and Stakeholder Engagement				
ESAP 10.1	<p>Information Disclosure/ Stakeholder Engagement/ Community Grievances</p> <ul style="list-style-type: none"> SEP to be updated if there are significant changes in the Project Publicize SEP and Grievance Mechanism including information on contact details of responsible staff to handle grievances Implement Grievance Mechanism Resolve grievances in a timely manner Undertake necessary preventative and corrective actions if needed <p>Document records of consultation and information disclosure Annual reporting to Lenders on the implementation of the ESAP and any new impacts/risks identified to affected communities in the scope of Environmental and Social Performance Annual Monitoring Report (AMR)</p>	<ul style="list-style-type: none"> Updated SEP Grievance log including records of grievances, response to grievances and corrective actions Grievance Consultation activity log Minutes of meetings Annual reports (AMR) 	During construction phase	<ul style="list-style-type: none"> A Stakeholder Engagement Plan (SEP) has been established for the construction phase. SEP has not been revised. SEP as well as the stakeholder list to include all stakeholders needs to be updated. MMT will continue to monitor the implementation of SEP within the scope of the construction monitoring studies. SEP and grievance forms have been disclosed in the Project website. However, SEP provided in the Project website is in the English language. SEP needs to be translated into local language which is Turkish. The EPC Contractor informed MMT during site visit, that the SEP is being updated as per recommended in the 3rd Construction Monitoring Report; however, during the site visit on 26 January 2023, The EPC Contractor informed MMT that the revision of SEP is still ongoing. There is a grievance mechanism in place. All public grievances are recorded in the Stakeholders' Grievance Track List. All the grievances received in Current Period are closed and information related the grievances were provided to the related persons. Community meetings attendance list and meeting records are kept and shared with MMT for review. AMR has not been prepared yet. MMT informed Lenders and Project Company to decide the period and the format of the Annual E&S Reporting. For more detailed information please refer to Section 2.5.

A. Site Photos

Photo 1 General view from General Hospital Building Construction



Source: EPC Contractor

Photo 2 General view from PTRH Building Construction



Source: EPC Contractor



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