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Kütahya Health Campus Project

Environmental and Social Management Plan
(ESMP)

December 2022

Confidential

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Issue and Revision Record

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Executive summary

1.1 Background

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

Mott MacDonald carried out an Environmental and Social Due Diligence (ESDD) study for the benefit of 'ICBC Turkey', 'Industrial Development Bank of Turkey (TSKB)', 'İş Bank' and 'Asian Infrastructure Investment Bank (AIIB)' ("the Lenders"). This study was undertaken with the primary objective to assess compliance of the Project against environmental and social regulations prevailing in Turkey, IFC Performance Standards (PSs), EP III as well as AIIB Environmental and Social Standards (ESSs). The 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. Gürüş İnşaat ve Mühendislik A.Ş. has been appointed as EPC Contractor, while Kütahya Hastane İşletmeleri Yatırım A.Ş. has been appointed as the Facilities Management Company ("FM Co" or "Service Provider"), which will undertake soft FM, hard FM, and will provide medical support services.

As a result, a Final ESDD Report and a final Environmental and Social Action Plan (ESAP) were prepared and submitted to the Lenders on 13 May 2022.

1.2 Scope of Work

Mott MacDonald was further requested to develop two separate Environmental and Social Management Plan (herein referred as "ESMP") for the construction and operation phases of the Project.

Draft ESMPs comprised of the list of environmental and social (E&S) action/mitigation measures identified against international standards of IFC, EP III and AIIB ESSs as well as national environmental and social legislation in a tabular format were prepared and submitted to the Lenders on 20 May 2022. As per Lenders' request, Mott MacDonald updated the ESMPs based on site visit conducted on 13-14 October 2022 within the scope of construction monitoring studies in order to be more comprehensive and updated. The ESMPs include information on responsible parties and anticipated timeframe for completion of actions/mitigation measures. The ESMPs apply to the Project Company, contractor/subcontractors and service providers. The ESMPs have been prepared in English language by Mott MacDonald, and the English version shall prevail over the Turkish translated version in case of an inconsistency between the two documents.

It is important to note that construction activities have been on-going on Project sites with overall completion rate of 56.27% as by the end of September 2022. Moreover, the Project's construction phase Environmental and Social Management System (ESMS) which includes a number of E&S management plans and procedures is available. Construction phase ESMP (in tabular format) is an overarching management plan which mostly refers to these subject specific E&S management plans and procedures. However, operation phase ESMS is not fully established by the Project Company at the current condition. Thus, operation phase ESMP (in tabular format) prepared by Mott MacDonald is primarily based on the outcomes of our ESDD

study as well as our experience in undertaking ESIA studies for similar hospital projects. It is necessarily to be updated by the Project Company considering the Project operation phase ESMS prior to commencement of hospitals. This will enable to facilitate ESMS implementations during the operation phase.

Please note that Mott MacDonald was also contracted to perform E&S construction and operations monitoring studies of the Project. Thus, we will continue to assess the Project's compliance with the Project's construction and operation phase ESMSs going forward.

2 Implementation of the ESMP

The Project Company, EPC Contractor and Service Provider are the key stakeholders involved in the construction and operation phases of the Project. The Project Company has overall accountability for the implementation of the mitigation measures outlined in this ESMP. The EPC Contractor and the Service Provider are required to transpose the measures and principles of this ESMP into Environmental and Social Management System (ESMS).

2.1 Roles and Responsibilities

This section outlines the roles and responsibilities for the Project Company, EPC Contractor and Service Provider.

2.1.1 Project Company

The Project Company holds the ultimate responsibility for the environmental and social performance including the performance of its contractors and overall accountability for the compliance of the Project activities during both construction and operation phases. It is the responsibility of the Project Company to oversee and monitor the implementation of relevant ESMP elements by EPC Contractor, Service Provider and any of their sub-contractors during the construction and operation phase. This includes auditing and assessing the EPC Contractor's and Service Provider's implementation of the relevant aspects of the ESMP, ensuring that corrective actions are taken when necessary to maintain ESMS performance in line with international standards and good international industry practice (GIIP).

The Project Company is responsible for developing the ESMS which outlines the systems and processes established to manage the environmental and social issues and revising relevant environmental and social management plans. The ESMS will establish policies for the Project and provide more details on the management at an organisational level in order to implement this ESMP and align with other management system requirements.

2.1.2 EPC Contractor

EPC Contractor is required to meet the specific requirements outlined within its ESMS, which is implemented through the agreements between the Project Company and EPC Contractor. The contractor agreements should ensure compliance with this ESMP and appropriate national and international requirements. It is the responsibility of the EPC Contractor to successfully implement the construction phase mitigation and monitoring measures outlined within this document through a dedicated ESMS and to ensure compliance of any construction contractors in meeting the requirements within the ESMS. The EPC Contractor will be required to undertake regular monitoring and inspections of the construction contractors and the Project site and will be required to keep up-to-date records as prescribed in this ESMP and report regularly to the Project Company.

2.1.3 Service Provider

The Service Provider will establish an environmental health and safety (EHS) department to oversee and manage all EHS issues during the operational phase. The ESMS will establish policies for the Project and provide more details on the management at an organisational level in order to implement this ESMP and align with other management system requirements. As the project moves into the operational phase, the Service Provider will have the responsibility of management and monitoring of environmental and social issues.

3 Construction Phase ESMP

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
C.1 General						
C.1.1	Environmental and Social Management System	IFC PS1 EP III AIIB ESS 1 Good International Industry Practices	Environmental and Social Management System (ESMS) that been established for the construction phase consists of a number of policies, plans and procedures (tier-documentation), including but not limited to the following will be implemented: <ul style="list-style-type: none"> • ESMS Manual • Emergency Preparedness and Response Plan (EPRP) • 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 	Project Company and EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> • Ensure to appoint a qualified Environment, Health and Safety and Social Manager/Team • Sufficient organizational structure for the implementation of the ESMS and this ESMP • Required documentation as per the implementation of ESMS and Project specific plans/procedures (such as training records of workers, audit (i.e., audit program) and inspection reports)

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Stakeholder Engagement Plan Chance Find Procedure <p>Environment, Health and Safety and Social Manager/Team will be appointed to supervise E&S implementations of the Contractor by the Project Company.</p> <p>Maintain and audit organizational structure for the implementation of the ESMS and relevant plans/procedures including works carried out by subcontractors.</p>			
C.1.2	Permitting	National Legislation	All necessary permits/approvals as needed during the construction phase will be obtained in accordance with the national legislation.	EPC Contractor of Project Company.	During construction phase	<ul style="list-style-type: none"> Ensure that a comprehensive 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, is prepared. Check records of permits, official letters, licenses, approvals, documents and similar.
C.1.3	Land ownership	National Legislation	Land certificates and Superficies right for the construction sites will be secured by Project Company prior to construction phase in order to indicate land ownership and land use right.	Project Company	Prior to construction phase	<ul style="list-style-type: none"> Land certificates Contracts of superficies right
C.1.4	Construction methods	IFC PS1 EP III National Legislation Good International Industry Practices	<p>Method statements will be developed for each construction activity.</p> <p>Method statements will be developed in line with good international industry practices to manage and monitor construction phase</p>	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Construction method statements

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			environmental, health and safety and social issues.			
C.1.5	Subcontractors	IFC PS2 EP III AIIB ESS 1	<p>Subcontractor Management Procedure, which was established by the Contractor and includes assessment of subcontractor performance; and commitments of subcontractors to comply with the Contractor's environmental, health and safety practices, will be implemented.</p> <p>A subcontractor list will be prepared. Subcontractors will be required:</p> <ul style="list-style-type: none"> to manage their workers in line with Project's HR policy and adopt grievance mechanism through contractual clauses. to adhere to the Project's EHS policies and plans through contractual clauses. to report accidents, incidents, and safety non-compliances through contract clauses. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Subcontractor Management Procedure is in place and implemented Check subcontractor list Check contracts made with subcontractors Check subcontractors' performance through monthly HSE assessment forms Check subcontractor personnel files Evidence of how workers are informed about the grievance mechanism Check grievance log Check subcontractor training records for EHS Check records of subcontractor's accidents, incidents, and non-compliances
C.2 Labour and Working Conditions						
C.2.1	Human Resources (HR)	IFC PS2 EP III AIIB ESS 1 National Legislation Good International Industry Practices	<p>The following measures will be implemented related to recruitment process and management of labour working conditions:</p> <ul style="list-style-type: none"> Employment and Procurement Plan and HR Policy, that are prepared for construction phase of the Project, will be implemented. Workers' contracts will be issued to workers upon recruitment which include contractual requirements on working conditions, potential deductions, terms of 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Employment and Procurement Plan and HR Policy are in place and implemented Ensure that Human Rights Policy, Ethical Principles Policy and Fighting Against Assault and Violence and Discrimination Policy are in place and implemented. Check employee/worker contracts Check records of personnel files

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			employment and environment, health and safety (EHS) responsibilities. <ul style="list-style-type: none"> Personnel files of all workers that include their work contracts, training records, medical surveillance records, next of kin contact details and similar, will be kept. Child and forced labour will be prohibited. All workers will be insured under Social Security Institution. A database of employees and subcontractor employees that includes information on the age, number, identity card number, gender, nationality and hometown will be kept. Payroll checks will be regularly controlled against issues such as sub-contractor wage rates, payment of benefits and timely payments. Hiring women will be encouraged, as well as the prevention and addressing of Gender Based Violence and Harassment (GBVH) in working places. 			<ul style="list-style-type: none"> Check the records of registration under the Social Security Institution Short quarterly reports available for review by external monitors
C.2.2	Occupational health and safety	IFC PS2 EP III AIIB ESS 1 IFC EHS Guidelines IFC EHS Guidelines for Health Care Facilities National legislation Good International Industry Practices	The following mitigation measures will be implemented to manage occupational health and safety: <ul style="list-style-type: none"> Occupational Health and Safety Plan which identifies the health and safety risks of activities during construction and the appropriate mitigation measures/personal protective equipment will be implemented. All employees as well as sub-contractors will receive necessary trainings on health and safety and EPRPs. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Occupational Health and Safety Plan is in place and implemented PPE training records Risk assessments Ensure a functional training monitoring system is in place and check training records Emergency assembly area, emergency exit and stairs labels Maintain accident and incident logs

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> • All employees as well as sub-contractors will be provided safety briefings every day before the work starts. • Emergency assembly areas will be determined, marked, and announced to employees. • Emergency exit and stair labels will be arranged inside the buildings under construction. • All incidents, accidents and non-compliances will be recorded. • Health and safety practices will be monitored through internal and external audits and necessary corrective actions will be undertaken. • Work Permit Procedure will be implemented throughout the construction phase. • All health and safety legislation applicable to the construction phase of the Project will be followed. • Sufficient number of fire extinguishers will be placed at working areas and regularly checked. • Insulation mats will be placed under the transformers. • All electrical equipment (such as manual electrical equipment, extension cables, electrical panels) and all work at height equipment (such as safety harnesses) will be inspected to identify any significant risk to users and others from the equipment's installation or use. 			<ul style="list-style-type: none"> • Maintain non-compliance log to record corrective and preventative actions • Maintain work permit procedure <p>Records of audit reports, regular inspections and similar</p>

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Periodical inspections will be undertaken and the equipment used on site will be logged into relevant track list. Grounding measurement reports shall be prepared for electrical panels, iron cutting machines and similar which may pose a significant risk to workers if grounding is not completed and recorded properly. Cables, safety devices must be properly installed, securely fixed and marked. Electrical equipment must be waterproof where necessary. Grounding and lightning protection must be fully isolated. Smoking at the working areas will be strictly prohibited and regularly checked. 			
C.2.3	Worker's grievances	IFC PS2 EP III AIIB ESS 1	<p>Grievance mechanism procedure, established as part of the ESMS including both internal and external grievance management procedures, will be implemented.</p> <p>Grievance Mechanism will be publicized to the workers.</p> <p>Grievances will be responded in a timely manner. Necessary corrective and preventative actions will be implemented, as required.</p>	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Grievance Mechanism Procedure is in place and implemented Grievance log including records of grievances, response to grievances, timing and corrective actions is kept
C.2.4	Worker's accommodation	IFC PS2 EP III AIIB ESS 1	<p>The following mitigation measures will be implemented to manage workers' accommodation:</p> <ul style="list-style-type: none"> Construction Camp Management Plan, that is prepared within the scope of the ESMS in line with the IFC and EBRD Guidance Note on Worker's 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Construction Camp Management Plan is in place and implemented Check audit reports/ Inspection records

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<p>Accommodation: Processes and Standards will be implemented.</p> <ul style="list-style-type: none"> • Special attention will be given to the following issues with regard to accommodation area: <ul style="list-style-type: none"> – Minimum space allocated per person (floor area; cubic volume; or size and number of rooms), – Supply of safe water in the workers' dwelling in such quantities as to provide for all personal uses, – Adequate sewage and garbage disposal systems, – Appropriate protection against heat, cold, damp, noise, fire, and disease-carrying animals, and, in particular, insects, – Adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting, – A minimum degree of privacy both between individual persons within the room and for the members of the room against undue disturbance by external factors. – Necessary provisions for any health, fire safety or other hazards or disturbances and local facilities as well as the provision of first aid and medical facilities. – Workers freedom of movement to and from the employer-provided 			

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<p>accommodation shall not be unduly restricted.</p> <ul style="list-style-type: none"> Internal and external (by a third party) regular audits will be undertaken at worker's accommodation facilities. 			
C.2.5	Gender equality and prevention of GBVH	IFC PS2 EP III AIIB ESS 1	<ul style="list-style-type: none"> Trainings on gender equality and prevention of GBVH risks will be given to the workers of the construction phase of the Project as a part of induction trainings. Human Rights Policy, Ethical Principles Policy and Fighting Against Assault and Violence and Discrimination Policy will be included in the training content and disclosed during the trainings. The trainings will aim at including all employees, especially security personnel will be trained in this regard. Measures will be taken to reduce the risks in the working environment (for example, separate toilets and bathrooms for male and female employees, separate rooms for leisure times, etc.). The working areas will be regularly inspected and monitored to maintain the conditions to prevent GBVH risks. Internal grievance mechanism will be accessible and confidential for women employees of the EPC Contractor and its contractors and suppliers to prevent GBVH cases with the possibility of anonymous application. Staff handling GBVH complaints will be trained to handle GBVH complaints in a confidential and safe way. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Check training presentations and training participation lists Check grievance records Check internal inspection records

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Grievance records will be reviewed by gender of the complainant and the subject of the grievance. 			
C.2.6	Suppliers	IFC PS2 EP III AIIB ESS 1	<ul style="list-style-type: none"> Supply Chain Management Plan that includes checking of suppliers to verify they are reputable and legitimate enterprises, will be implemented. <p>The following mitigation measures will be implemented related to manage suppliers:</p> <ul style="list-style-type: none"> Suppliers will be selected as close as possible to the Project sites. A supplier list will be prepared. Supply materials will be taken from licensed/certificated/permited suppliers/facilities. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Supply Chain Management Plan is in place and implemented Check records of supply sources Check supplier list Check licenses/certificates/permits of the suppliers
C.2.7	Labour audit	IFC PS2 EP III AIIB ESS 1	An annual third-party labour audit for assessment of compliance of the site will be carried out.	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Annual third-party audit report
C.3 Resource Efficiency and Pollution Prevention						
C.3.1	Soil, Surface Water and Groundwater	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Spill Response Plan prepared as part of ESMS for the construction phase will be implemented. All subcontractors will adopt good construction site practices for the protection of soil, surface water and groundwater (e.g., storage areas, spillage control, spill kits etc.). Spill response kits will be kept at designated areas with specific instructions for their use and site staff will receive necessary training on the use of spill kits. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Spill Response Plan is in place and implemented Ensure the presence of spill response kits near the chemical/waste storage areas Check training records Check audit and control results, spillage incident records, contaminated soil disposal records and similar Check appropriate designated storage areas are constructed for fuel, oils, chemicals and wastes

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Construction activities will be regularly inspected on site. Any spillages from handling fuel and liquids will be immediately contained on site. Potentially contaminated materials and soil will be removed from site as soon as practicable for authorised disposal and suitable treatment. Fuel and other chemicals storage will be stored in designated areas with potentially contaminating substances stored on drip trays or in double skinned bunded tanks. Fuel loading/unloading to vehicles/equipment will only take place at designated areas away from the drainage pathway within the construction site. The volume of ground water use will be monitored against the maximum allowed groundwater to be extracted in the official letter obtained from the relevant authority. 			<ul style="list-style-type: none"> Ensure that the maximum allowed groundwater to be extracted
C.3.2	Hazardous materials	IFC PS3 EP III AIIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Hazardous Materials Management Plan, that is already prepared as part of ESMS for the construction phase, will be implemented. Inventory of hazardous materials will be prepared including physical and chemical properties of the materials to ensure that appropriate measures are in place. Safety Data Sheets (SDSs) will be kept at relevant locations. Appropriate Personal Protective Equipment (PPE) will be made available for relevant personnel and personnel will 	EPC Contractor of Project Company.	During construction phase	<ul style="list-style-type: none"> Ensure that Hazardous Materials Management Plan is in place and implemented Check hazardous material inventory Check SDSs Check training records of employees Check records of audits and site inspections Check incident records Check appropriate designated storage areas for hazardous materials and fire-fighting equipment

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<p>be trained on the use and storage of personal protective equipment.</p> <ul style="list-style-type: none"> • Volume of hazardous materials and stock will be regularly controlled on site. • All hazardous materials will be stored at designated areas having necessary containment and handled with care by authorized staff to prevent potential spills. • Appropriate fire-fighting equipment will be placed close to hazardous material storage/usage areas. 			
C.3.3	Waste management	IFC PS3 EP III AII ESS 1 National legislation Good International Industry Practices	<p>Following plans that are already prepared in the scope of Project's ESMS will be implemented:</p> <ul style="list-style-type: none"> – Waste Management Plan – Emergency Preparedness and Response Plan – Hazardous Material Management Plan <p>The following mitigation measures will be implemented related to waste management:</p> <ul style="list-style-type: none"> • All wastes will be collected, segregated labelled and stored, transported, recycled in line with the Waste Management Plan. • Hazardous wastes will be properly stored at the designated waste storage area. • Wastes will be disposed at licensed facilities according to their category in accordance with regulatory requirements. • Records of waste generation, storage, and disposal will be kept. • Licensed haulers will be used for the transport of wastes and waste transfer certificates will be kept. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> • Ensure that Waste Management Plan, Emergency Preparedness and Response Plan and Hazardous Material Management Plan are in place and implemented • Check temporary waste storage area to ensure that hazardous wastes are properly stored at the construction site • Check records of periodic on-site inspections conducted to check all wastes are separately collected, segregated, labelled, and stored in designated areas • Check disposal records of all types of wastes • Check waste disposal contracts • Check records of waste inventory • Check licenses of haulers' and disposal facilities • Check training records • Check records of permits, approvals and declarations (ie. annual waste declaration made to the authority,

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Construction site workers will receive necessary training on waste management practices. All required permits, approvals and declarations related to waste management will be taken. 			insurance policies for hazardous waste (compulsory financial liability)
C.3.4	Wastewater	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Wastewater Management Plan that are already prepared in the scope of Project's ESMS will be implemented. Domestic wastewater will be discharged to the municipality infrastructure in accordance with the permits and protocols for connection to the municipal sewer system. No industrial wastewater will be discharged in the system. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Wastewater Management Plan is in place and implemented Check municipal sewer system connection approval obtained from the relevant authority
C.3.5	Air Emissions (dust, exhaust emissions)	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Air Quality Management Plan that is already prepared in the scope of Project's ESMS will be implemented. Construction sites, particularly the excavation areas, will be moisturized in hot-dry seasons or in windy conditions. Open storage piles will be moisturized in hot-dry seasons or in windy conditions (if necessary the material may also be compacted). Wind control measures (construction of shields, walls or planting trees) will be taken into account to prevent dust emissions in open storage piles. Where feasible, the open area sources (e.g. areas subjected to topsoil stripping) will be reinstatement as soon as possible. Air quality measurements for PM₁₀ will be monitored on a monthly basis at six 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Air Quality Management Plan is in place and implemented Check records of site inspections Check records of air quality monitoring measurement results undertaken by a third-party Check equipment and vehicle maintenance records Training records of workers and drivers

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<p>monitoring locations (four measurement locations located near construction area borders in General Hospital, whereas two locations located near construction area borders at Physical Therapy and Rehabilitation Hospital (herein referred as 'PTRH')).</p> <ul style="list-style-type: none"> • Drivers and operators will be trained to comply with the speed limit (which is max. of 30km/h) and apply good construction site practices. • Trucks carrying excavated soils will be covered before leaving the construction area. • The construction equipment and trucks will be maintained regularly to keep them in good working condition to minimize exhaust emissions caused by poor performance. • Low sulphur fuel will be preferred as far as possible. • Engines of the equipment/trucks will be prevented from idling and running unnecessarily. 			
C.3.6	Noise Emissions	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> • Noise and Vibration Management Plan (NMP) that is already prepared in the scope of Project's ESMS will be implemented. • Noise measurements will be monitored on a monthly basis at six monitoring locations (four measurement locations located near construction area borders in General Hospital, whereas two locations located near construction area borders at PTRH). 	EPC Contractor of Project Company.	During construction phase	<ul style="list-style-type: none"> • Ensure that Noise and Vibration Management Plan is in place and implemented • Check records of site inspections • Check records of noise monitoring measurement results undertaken by a third-party • Check approvals/correspondence letters, if necessary

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> If levels at receptors exceed the standards and/or a grievance is received from public, measures will be taken to reduce noise levels so that the limit values are met during all phases of construction. Regular maintenance will be carried out on construction equipment to ensure noise levels are maintained within requirements. Noise sources will be relocated to less sensitive areas to take advantage of distance and shielding, where possible. Necessary consent from will be obtained from Kütahya Provincial Directorate of Environment, Urbanization and Climate Change for undertaking construction activities during night-time (if occurs). Awareness among construction workers will be increased regarding noise mitigations. Appropriate personal protective equipment and materials will be provided to workers. Machines will be shut down or throttled down to a minimum when not in operation. Vibration levels will be monitored upon a grievance is made by the nearby residents and if the standards are exceeded, measures will be taken to reduce vibration. 			<ul style="list-style-type: none"> Training records of workers and drivers
C.4 Community Health, Safety and Security						
C.4.1	Community Health and Safety (General)	IFC PS4 EP III AIB ESS 1 National legislation	<ul style="list-style-type: none"> All relevant health and safety regulations will be followed during the development and construction of the Project in order to minimize accidents that may have impacts on the community and to control potential Project related releases and/or emissions 	Project Company. and EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Check records of audits and regular inspections Ensure placement of sufficient number of traffic signs Check training records

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
		Good International Industry Practices	<ul style="list-style-type: none"> Emergency Preparedness and Response Plan (EPRP) that is already prepared in the scope of Project's ESMS will be implemented and will be disclosed to communities through Project website. Local authorities and communities will keep updated if there are changes in the EPRP. Drills/exercises of emergency measures will be regularly undertaken. All employees will be trained on health and safety, and Emergency Preparedness and Response Plan to respond timely to the incidents. Any identified impacts, risk, and mitigation measures with communities will be documented during construction and at least annually in the scope of Environmental and Social Performance Annual Monitoring Report (AMR). 			<ul style="list-style-type: none"> Check evidence of disclosure and updates to communities Check records of drills Check records of meeting with the communities Annual Monitoring Report (AMR)
C.4.2	Life and fire safety	IFC PS4 EP III AIIIB ESS 1 National legislation Good International Industry Practices	<p>The following mitigation measures will be implemented related to life and fire safety:</p> <ul style="list-style-type: none"> The Hospitals will be designed, constructed, and operated in full compliance with local building codes, local fire department regulations, local legal and insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard. A fire expert will 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. 	EPC Contractor of Project Company	<p>Towards the end of construction phase</p> <p>At the time of commissioning</p>	<ul style="list-style-type: none"> Ensure necessary confirmation for fire safety of offices and accommodation area Third party audit report for life and fire safety Check test and commissioning results Obtain post construction life and fire safety certification (ie. Fire Safety Certificate and L&FS Certificate)

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> The third-party life and fire safety consultant will review the life and fire safety design and will make recommendations if any significant issues are identified. Provide design certification by the above professional to comply with life and fire safety requirements. Life and fire safety systems will be reviewed during testing and commissioning and certifying that construction of life and fire safety system has been carried out in accordance with the accepted design. 			
C.4.3	Security	IFC PS4 EP III AIIB ESS 1 Good International Industry Practices	<ul style="list-style-type: none"> Security Management Plan (SMP) that is already prepared in the scope of Project's ESMS will be implemented. An adequate number of and trained security staff (unarmed) will be hired. Contractor will ensure that security staff have not been involved in past security related incidents/abuses. Security staff will receive specific training on Human Rights Protection. All security personnel will hold relevant certificates. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Security Management Plan is in place and implemented Check records of audits and inspections Check training records of security staff Check records of credentials of security staff
C.4.4	Traffic	IFC PS4 EP III AIIB ESS 1 Good International Industry Practices	<ul style="list-style-type: none"> Traffic Management Plan will be in place and implemented. Road transportation impacts will be minimized with the implementation of Traffic Management Plan that has been developed for the construction phase of the Project. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Traffic Management Plan is in place and implemented Check evidence of disclosure and updates to communities Check grievance log including records of grievances, response to grievances and corrective actions

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> • Pedestrian walkovers at the construction site will be clearly marked. • Traffic signs including speed limit will be installed inside the construction site. • Necessary consultations will be undertaken with the local authorities regarding physical road safety measures. • Road maintenance will be provided in case of any physical damage occurs due to the Project activities. • Specific requirements for subcontractors in relation to road safety and speed limits will be defined when passing near neighbourhoods. • Consultations will be undertaken with the nearby communities to raise awareness on traffic safety. • Grievance mechanism will be implemented, and grievances will be resolved in a timely manner and necessary preventative and corrective actions, if needed, will be undertaken. 			<ul style="list-style-type: none"> • Check consultation activity log • Check records of maintenance activities • Ensure the requirements are met by the subcontractors
C.5 Cultural Heritage						
C.5.1	Chance Finds	IFC PS8 EP III AIIB ESS 1 National Legislation Good International Industry Practices	<ul style="list-style-type: none"> • Chance Find Procedure will be implemented throughout the construction phase. • In case of any chance find is encountered, construction activity will be stopped immediately. • Relevant authorities (ie., nearest Museum Directorate) will be contacted in case of any chance finds. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> • Check records of chance finds documentation • Review copies of correspondence with authorities • Check training records

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Workers will receive training on the Chance Find Procedure. 			
C.6 Ecology						
C.6.1	Flora and Fauna	IFC PS6 EP III AIIB ESS 1	<ul style="list-style-type: none"> Land area requirements for both permanent, temporary facilities and areas of clearance will be limited to the extent possible. Workers will be informed about flora/fauna. 	EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Check training records
C.7 Stakeholder Engagement						
C.7.1	Information Disclosure/ Stakeholder Engagement/ Community Grievances	IFC PS10 EP III AIIB ESS 1 Good International Industry Practices	<p>The following mitigation measures will be implemented related to information disclosure/ stakeholder engagement/ community grievances:</p> <ul style="list-style-type: none"> Stakeholder Engagement Plan (SEP) and grievance mechanism will be implemented. SEP will be updated if there are significant changes in the Project. SEP and grievance mechanism, including information on contact details of responsible staff to handle grievances, will be publicized.. Written and verbal grievances will be recorded and resolved in a timely manner and necessary preventative and corrective actions, if needed, will be undertaken. Records of consultation and information disclosure will be documented, and annual reporting will be made to Lenders on the implementation of the ESAP and any new impacts/risks identified to affected communities in the scope of 	Project Company and EPC Contractor of Project Company	During construction phase	<ul style="list-style-type: none"> Ensure that Stakeholder Engagement Plan and Grievance Mechanism are in place and implemented Ensure to update SEP, if changes occur in the Project Check grievance log including records of grievances, responses to grievances and corrective actions Check consultation activity log Minutes of meetings of consultations/engagement activities Annual Monitoring Report (AMR)

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			Environmental and Social Performance Annual Monitoring Report (AMR). <ul style="list-style-type: none"> All information disclosed will be in both English and local language. 			
C.7.2	Project-Affected People's Mechanism	AIIB ESS 1	<ul style="list-style-type: none"> The Project-affected People's Mechanism has been established by the Bank (AIIB) to provide an opportunity for the independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by the AIIB's failure to implement its Environmental and Social Policy in situations when their concerns cannot be addressed satisfactorily through the Project-level grievance redress mechanisms or the AIIB's management processes¹. 	AIIB in collaboration with Project Company and EPC Contractor of Project Company	During construction	<ul style="list-style-type: none"> Check records of grievances, response to grievances and corrective actions Check consultation records

¹ More information about the Project-affected People's Mechanism, can be found through visiting: <https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html>.

4 Operation Phase ESMP

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
O.1 General						
O.1.1	Environmental and Social Management System	IFC PS1 EP III AIIB ESS 1 Good International Industry Practices	<ul style="list-style-type: none"> • An operational phase ESMS will be developed in line with international good practice and guidelines. • Necessary consultation will be undertaken with the Ministry of Health (MoH) during the development of the ESMS. • Following plans identified for the operation phase will be part of operational phase ESMS including but not limited to: <ul style="list-style-type: none"> – Air Quality Control and Monitoring Plan – Noise Management Plan – Waste Management Plan (covers all wastes including solid, medical, and hazardous waste) – Wastewater Management Plan – Hazardous Material Management Plan – Emergency Preparedness and Response Plan (EPRP) – Kütahya Health Campus Traffic Management Plan – Community Health and Safety Plan – Exposure Control Plan for blood-borne pathogens – Radiation Exposure Control Plan – Radioactive Substance Management Plan 	Project Company. and Service Provider of Project Company and MoH (as necessary)	Prior to operation phase	<ul style="list-style-type: none"> • Check written and approved site specific environmental and social plans/procedures • Check required documentation as per ESMS and specific plans (e.g., permits, consents, official correspondence, monitoring results, audit reports (audit program) and similar) • Check training records including awareness training on principles of gender equality and prohibition of harassment to employees etc. • Sufficient organizational structure and defined roles for ESMS • Appoint Environmental and Social Manager/Team. • Grievance log including records of grievances, response to grievances and corrective actions

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> - Pandemic Management Plan - Life and Fire Safety Plan - Security Management Plan - Human Resources Management Plan - Occupational Health and Safety Management Plan - Service Provider (Subcontractor) Management and Monitoring Plan • Designated staff will receive training on environmental and social topics and implementation of the Hospital-specific plans. • An organizational structure will be established for the implementation of the ESMS in cooperation with MoH. • A qualified Environmental and Social Manager/Team will be appointed to supervise E&S implementations of the service providers by the Project Company. • Facilities management company, which will be appointed to provide soft facilities management (FM), hard FM and medical support services, will have an environmental and social team onsite².A grievance mechanism will be established for both internal and external grievances. 			
O.1.2	Permitting	National Legislation	All necessary permits/approvals as needed during the operation phase will be obtained in accordance with the national legislation.	Service Provider of Project Company and MoH (as necessary)	Prior to and during operation phase	<ul style="list-style-type: none"> • Ensure that a comprehensive permit register is prepared

² It is recommended that the Facilities management company to appoint occupational health, safety and environment manager who will be present full time at the Hospital. This involvement from the facility management will be beneficial for the effective implementation of ESMS at the Hospital.

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
						<ul style="list-style-type: none"> Check records of permits, official letters, licenses, approvals, documents and similar Check records of testing and audits as per the requirements of permitting
O.1.3	Hospital Commissioning	IFC PS1 EP III National Legislation Good International Industry Practices	All relevant commissioning tests will be carried out.	Project Company. and EPC Contractor of Project Company	Prior to operation phase	<ul style="list-style-type: none"> Check records of commissioning tests.
O.1.4	E&S audit at the facilities	IFC EHS Guidelines for Health Care Facilities	A third party environmental and social audit of the project will be carried out in accordance with IFC Environmental, Health and Safety Guideline for Health Care Services after the commencement of the Hospital.	Service Provider of Project Company§.	Within one and a half year of the commencement of the Hospitals and then every three years ³	<ul style="list-style-type: none"> Audit Report (to be submitted to the Lenders for review) Remedial measures report, if any
O.1.5	Subcontractors	IFC PS2 EP III AIB ESS 1	<p>Service Provider (Subcontractor) Management and Monitoring Plan will be prepared and implemented. A subcontractor list consented by the MoH will be prepared.</p> <p>Subcontractors⁴ will be required:</p> <ul style="list-style-type: none"> to manage their workers in line with Project's HR policy, ESAP and IFC PSs and adopt grievance mechanism through contractual clauses to report accidents, incidents, and safety non-compliances through contract clauses. <p>Audits will be conducted to check if the subcontractors' HSE performance and corrective actions will be taken if necessary.</p>	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Service Provider Management and Monitoring Plan is in place and implemented Check subcontractor list Check subcontractor contracts Check records of subcontractor's accidents, incidents, and non-compliances Check subcontractor personnel files Evidence of how employees are informed about the grievance mechanism Check grievance log

³ Frequency of the audit can be revised based on the previous audit findings with the approval of the Lenders.

⁴ Subcontractors mean subcontractors of the Service Providers.

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
						<ul style="list-style-type: none"> Check subcontractors' performance through monthly HSE assessment forms
O.2 Labour and Working Conditions						
O.2.1	Human Resources and Terms of Employment	IFC PS2 EP III AIIB ESS 1 National Legislation Good International Industry Practices	<p>The following measures will be implemented related to recruitment process and management of labour working conditions:</p> <ul style="list-style-type: none"> Develop a Human Resources Management Plan and HR Policy in line with IFC PS2 and ensure all employees are aware of the content. Employee/worker contracts will be issued to employees setting out working conditions, terms of employment and EHS responsibilities. All employees/workers personnel files that include their work contracts, training records, medical surveillance records, next of kin contact details and similar will be kept. Child and forced labour will be prohibited. All employees/workers will be insured under Social Security Institution (SSI). Database of employees/workers and service providers that includes information on the age, identity card number, gender, nationality and hometown will be developed. Payroll checks will be made by facility management contractor (ie., service provider of Dumlupınar Sağlık Yatırım A.Ş) against issues such as sub-contractor wage rates, payment of benefits and timely payments. 	Project Company and Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Human Resources Management Plan and HR Policy are in place and implemented Check employee/worker contracts Check records of personnel files and records of registration under the Social Security Institution Check database of employees/workers Short quarterly reports available for review by external monitors

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Hiring women will be encouraged, as well as the prevention and addressing of Gender Based Violence and Harassment (GBVH) in working places. 			
O.2.2	Occupational Health and Safety (OHS)	IFC PS2 EP III AIIB ESS 1 IFC EHS Guidelines IFC EHS Guidelines for Health Care Facilities National Legislation Good International Industry Practices	The following mitigation measures will be implemented to manage occupational health and safety: <ul style="list-style-type: none"> Occupational Health and Safety Plan and relevant procedures will be prepared and implemented. Safety and induction training will be provided to employees/workers. Emergency assembly areas will be determined, marked, and announced to employees. First-aid training will be provided to relevant number of employees/workers as required by national legislation. All incidents, accidents and non-compliances will be recorded. Health and safety practices will be monitored through internal and external audits and necessary corrective actions will be undertaken. Sufficient number of fire extinguishers will be placed at working areas and regularly checked. Smoking at the working areas will be strictly prohibited and regularly checked. All health and safety legislation applicable to the operation phase will be followed. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Occupational Health and Safety Plan is in place and implemented Check records of audit reports, regular inspections, trainings for employees/workers and similar Check and maintain accident and incident logs Maintain non-compliance log to record corrective and preventative actions Check records of corrective actions

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
O.2.3	Workers' grievances	IFC PS2 EP III AIIB ESS 1 Good International Industry Practices	A labour grievance mechanism will be established and implemented. The mechanism will be publicized to the employees.	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Labour grievance log including records of grievances, response to grievances and corrective actions is kept
C.2.5	Gender equality and prevention of GBVH	IFC PS2 EP III AIIB ESS 1	<ul style="list-style-type: none"> Trainings on gender equality and prevention of GBVH risks will be given to the workers of the operation phase of the Project as a part of induction trainings. The trainings will aim at including all employees, especially security personnel will be trained in this regard. Measures will be taken to reduce the risks in the working environment (for example, separate toilets and bathrooms for male and female employees, separate rooms for leisure times, etc.). The working areas will be regularly inspected and monitored to maintain the conditions to prevent GBVH risks. Internal grievance mechanism will be accessible and confidential for female employees of the Service Provider and its contractors and suppliers to prevent GBVH cases with the possibility of anonymous application. Staff handling GBVH complaints will be trained to handle GBVH complaints in a confidential and safe way. Grievance records will be reviewed by gender of the complainant and the subject of the grievance. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Check policies Check training presentations and training participation lists Check grievance records Check internal inspection records
O.2.4	Suppliers	IFC PS2 EP III AIIB ESS 1	The following mitigation measures will be implemented related to manage suppliers:	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of supply sources Check supplier list

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Suppliers will be selected as close as possible to the Project site. A supplier list will be prepared. Supply materials will be taken from licensed/certificated/permitted suppliers/facilities. Recycled materials and materials certified as "green" and low carbon will be preferred to the extent possible. 			<ul style="list-style-type: none"> Check licenses/certificates/permits of the suppliers
O.3 Resource Efficiency and Pollution Prevention						
O.3.1	Health Care Waste Management System (HWMS)	IFC PS3 EP III AIIB ESS 1 IFC EHS Guidelines for Health Care Facilities National legislation	<ul style="list-style-type: none"> A Health Care Waste Management System (HWMS) will be established and implemented as per IFC Requirements. Necessary consultation will be undertaken with the MoH during the development of the HWMS. 	Service Provider of Project Company and MoH (as necessary)	Prior to and during operation phase	<ul style="list-style-type: none"> Check HWMS documentation Check records of audits and inspections Check records of healthcare waste management, storage, transport, and disposal
O.3.2	Soil, Surface Water and Groundwater	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Good operation practices will be applied for the protection of soil, surface water and groundwater (eg., storage areas, spillage control, spill kits etc.). Regular periodic integrity testing for hazardous material storage equipment will be performed. Spill response kits will be kept at designated areas with specific instructions for their use and site staff will be trained on the use of spill kits. Response to the spill will be made as fast as possible. Contaminated materials will be collected and sent to appropriate disposal facilities. 	Service Provider of Project Company.	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of regular integrity testing, if any Check presence of spill response kits Check audit and control results, spillage incident records, contaminated soil disposal records, training records and similar

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> An EPRP will be developed to ensure mitigation of spills from hazardous materials during operation. 			
O.3.3	Hazardous Materials	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<ul style="list-style-type: none"> Hazardous materials will be handled according to the Hazardous Material Management Plan. Inventory of hazardous materials will be prepared including physical and chemical properties of the materials to ensure that appropriate measures are in place. Safety Data Sheets (SDSs) will be kept at relevant locations. Appropriate Personal Protective Equipment (PPE) will be made available for relevant personnel. Personnel will be trained on the use and storage of personal protective equipment. Appropriate fire-fighting equipment will be placed close to hazardous material storage/usage areas. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Hazardous Materials Management Plan is in place and implemented Check hazardous material inventory Check SDSs Check training records of employees Check records of audits and site inspections Check incident records Check appropriate designated storage areas for hazardous materials and fire-fighting equipment
O.3.4	Waste Management	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<p><i>General</i></p> <ul style="list-style-type: none"> Plans/procedures/supporting documents related to waste management will be prepared implemented. Waste management services will comply with the Project Agreement which is the main contract between Ministry of Health and the Project Company. Waste Management Method Statement, Waste Management Service Plan and Waste Management Technical Specification will be prepared and implemented as defined by the Project Agreement. 	Service Provider of Project Company and Provincial Directorate of Health (PDoH)	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that plans/procedures/supporting documents related to waste management are in place and implemented Check licenses of transportation companies and disposal facilities Check records of waste inventory Check waste transportation and disposal records (i.e., mobile hazardous waste track system record) Check records of permits, approvals and declarations

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> The HWMS will be put in place in line with the waste management practices given in the IFC Guidelines for Health Care Facilities. All wastes will be managed (collect, transport, dispose etc.) in accordance with the legal requirements. Records of waste generation, storage, and disposal will be kept. Licensed haulers will be used for the transport of wastes and waste transfer certificates will be kept. All required permits, approvals and declarations related to waste management plan will be taken. Relevant personnel will receive necessary training on waste management practices. <p><i>Radioactive Waste Management</i></p> <ul style="list-style-type: none"> Turkish Atomic Energy Authority (TAEK) will be informed on the radioactive waste generation and identify radioactive waste management options prior to implement any practice with TAEK. <p><i>Medical Waste Management</i></p> <ul style="list-style-type: none"> Medical waste management plan will be prepared and implemented jointly by Waste Service Provider and the Provincial Directorate of Health (PDoH) as per the Medical Waste Control Regulation. Necessary actions as per the Medical Waste Control Regulation (ie signing a protocol with municipality for collection, transportation and disposal of medical waste, provision of training to employees working for waste services) will be undertaken. Necessary consultation/communication with Kütahya Municipality will be 			<ul style="list-style-type: none"> Check records of audits related to the implementation of plans/procedures/supporting documents related to waste management

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
O.3.5	Wastewater Management	IFC PS3 EP III AIIB ESS 1 National legislation Good International Industry Practices	<p>undertaken to obtain a confirmation letter regarding that it has sufficient capacity to accept additional medical waste load.</p> <ul style="list-style-type: none"> Plans/procedures/supporting documents related to wastewater management will be prepared and implemented. <p><i>Domestic Wastewater</i></p> <ul style="list-style-type: none"> Domestic wastewater will be discharged to the municipality infrastructure in accordance with the permits⁵. Effluent analysis will be conducted based on the monitoring frequency and proposed limits provided by the local relevant authority. <p><i>Radioactive Effluent</i></p> <ul style="list-style-type: none"> Procedures and mechanisms will need to be in place for the separate collection of urine, faeces, blood, and vomit from patients treated with geno-toxic drugs to avoid their entry into the wastewater stream. Necessary measures will be undertaken for liquid wastes contaminated with radioactive substances as per the Regulation on Wastes Generated upon Usage of Radioactive Substances (OG date/no: 02.09.2004/25571) related to discharging this type of wastewater into the sewer system. <p><i>Other Effluent from Laboratories</i></p>	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of audits related to the implementation of plans/procedures/supporting documents related to wastewater management Check wastewater connection quality control permit obtained from the relevant authority Check effluent analysis results to ensure they met discharge criteria

⁵ Regarding the environmental standards of the wastewater to be discharged from hospitals for allowing the connection to the WWTP, wastewater connection permit should be secured for the operation phase prior to the operation of the hospitals. In general, the wastewater connection permits/documents either refer to discharge limits defined in Table 25 (presented in the appendices) of the Water Pollution Control Regulation (OG Date/Number: 31.12.2004/25687) and/or municipalities' regulations on wastewater discharge standards whichever more stringent. The regulation on wastewater discharge standards (including discharge limits for wastewater parameters given in the appendices of the regulation) of Kütahya Municipality is published in the Municipality's official website. The validity and final version of this regulation shall be confirmed with the Municipality by Project Company during the permitting stage.

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> Discharge of chemicals used in the laboratories and the effluents from laboratory equipment will not be disposed into sewer system and these are transferred to barrels via special collection systems. 			
O.3.6	Radioactive Substances	IFC PS3 EP III AIIB ESS 1 International Atomic Energy Agency standards National legislation	<ul style="list-style-type: none"> Radioactive substances will be managed in accordance with the national law and IFC EHS Guidelines for Health Care Facilities. Radioactive Substance Management Plan will be prepared and implemented. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Radioactive Substance Management Plan is in place and implemented Check licenses issued by Turkish Atomic Energy Authority (TAEK)
O.3.7	Air Emissions	IFC PS3 EP III AIIB ESS 1 National legislation	<ul style="list-style-type: none"> Air Quality Control and Monitoring Plan and Kütahya Health Campus Traffic Management Plan will be prepared and implemented. Emissions from trigeneration and boiler systems will be monitored in line with national regulatory requirements and IFC General EHS Guidelines. Direct and indirect greenhouse gas (GHG) emissions will be quantified annually. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of audits related to the implementation of the Air Quality Control and Monitoring Plan and Kütahya Health Campus Traffic Management Check stack gas measurement results Annual GHG emissions report
O.3.8	Noise	IFC PS3 EP III AIIB ESS 1 National legislation	<ul style="list-style-type: none"> Noise Management Plan will be prepared and implemented. Noise emissions will be monitored in line with national regulatory requirements and IFC General EHS Guidelines. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of audits related to the implementation of the Noise Management Plan Check noise measurement results
Community Health, Safety and Security						
O.4.1	Community Health and Safety (General)	IFC PS4 EP III AIIB ESS 1 National legislation	Following plans will be implemented: <ul style="list-style-type: none"> Community Health and Safety Plan Emergency Preparedness and Response Plan 	Project Company and Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> Ensure that Community Health and Safety Plan, Emergency Preparedness and Response Plan and Kütahya

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
			<ul style="list-style-type: none"> – Kütahya Health Campus Traffic Management Plan ● Local authorities and communities will keep updated if there are changes in the EPRP. ● Drills/exercises of emergency measures will be regularly undertaken. ● All employees will receive necessary trainings to respond timely to the incidents. ● Any identified impacts, risk, and mitigation measures with communities will be documented during operation and at least annually in the scope of Environmental and Social Performance Annual Monitoring Report (AMR). 			<ul style="list-style-type: none"> Health Campus Traffic Management Plan are in place and implemented. ● Check training records ● Check evidence of disclosure and updates to communities ● Check records of drills ● Annual Monitoring Report (AMR)
O.4.2	Security	IFC PS4 EP III AIIB ESS 1	<ul style="list-style-type: none"> ● Security Management Plan (SMP) will be prepared and implemented. ● An adequate number of and trained security staff (unarmed) will be hired. ● It will be ensured that security staff have not been involved in past security related incidents/abuses. ● Security staff will receive specific training on human rights protection. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> ● Ensure that Security Management Plan is in place and implemented ● Check training records of security staff ● Check records of credentials of security staff
O.4.3	Life and fire safety	IFC PS4 EP III National legislation	<ul style="list-style-type: none"> ● Life and Fire Safety Plan will be prepared and implemented. Operation of the Hospitals in full compliance with the Turkish Regulations on the Protection of Buildings from Fire and National Fire Protection Association standards (NFPA) will be ensured. ● All fire safety systems will be maintained in proper working order. 	Service Provider of Project Company	Prior to and during operation phase	<ul style="list-style-type: none"> ● Check records for the implementation of the Life and Fire Safety Plan ● Check maintenance and periodic inspection records

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
O.4.4	Infectious Disease Control	IFC PS4 EP III AIIB ESS 1 National legislation	<ul style="list-style-type: none"> Exposure Control Plan for blood-borne pathogens and inform employees/workers/visitors on infection control policies will be implemented. Pandemic Management Plan against Covid-19 and implement measures will be implemented. Measures and guidelines of the MoH against ongoing Covid-19 pandemic will be communicated. A system of infection related incident and accidents with management oversight will be set up. 	Service Provider of Project Company and MoH	Prior to and during operation phase	<ul style="list-style-type: none"> Check records of audits for the implementation of the plans and policies for infection control Check immunization records
Stakeholder Engagement						
O.5.1	Information Disclosure/ Stakeholder Engagement/ Community Grievances	IFC PS10 EP III AIIB ESS 1	<ul style="list-style-type: none"> Stakeholder Engagement Plan (SEP) will be updated and implemented. Community grievance mechanism will be implemented. SEP and grievance mechanism, including information on contact details of responsible staff to handle grievances, will be publicized. Grievances will be resolved in a timely manner and necessary preventative and corrective actions, if needed, will be undertaken. Annual reporting to Lenders on the implementation of the ESMS and any new impacts/risks identified to affected communities in the scope of Environmental and Social Performance Annual Monitoring Report (AMR). 	Project Company and Service Provider of Project Company	During operation phase	<ul style="list-style-type: none"> Ensure that Stakeholder Engagement Plan and Community Grievance Mechanism are in place and implemented Check grievance log including records of grievances, response to grievances and corrective actions Check consultation activity log Minutes of meetings of consultations/engagement activities Annual Monitoring Report (AMR)

Reference	Subject	Relevant Requirement/ Standard	E&S Action/Mitigation Measures	Responsibility	Timing	Monitoring and Evaluation Criteria
O.5.2	Patient's grievances	IFC PS10 EP III AIIB ESS 1	<ul style="list-style-type: none"> It will be ensured that Patient's Grievance Mechanism for health services is in place in coordination with the MoH. 	Service Provider of Project Company and MoH	During operation phase	<ul style="list-style-type: none"> Patient's grievance mechanism
O.5.3	Project-Affected People's Mechanism	AIIB ESS 1	<ul style="list-style-type: none"> The Project-affected People's Mechanism has been established by the Bank (AIIB) to provide an opportunity for the independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by the AIIB's failure to implement its Environmental and Social Policy in situations when their concerns cannot be addressed satisfactorily through the Project-level grievance redress mechanisms or the AIIB's management processes⁶. 	AIIB in collaboration with Service Provider of Project Company and MoH	During operation phase	<ul style="list-style-type: none"> Check records of grievances, response to grievances and corrective actions Check consultation records

⁶ More information about the Project-affected People's Mechanism, can be found through visiting: <https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html>.

