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CONSTRUCTION CAMP MANAGEMENT AND MONITORING PLAN**PURPOSE SCOPE**

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with Turkish regulatory framework, with IFC Performance Standards, IFC EHS General and Sector Specific Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC. The purpose of the plan is to design and built construction camps in line with applicable standards and prevent any potential negative impact from the construction camps during the Project Construction phase.

This Plan includes guidelines and minimum requirements for EPC Contractor for defining its own procedures appropriate to the nature and scale of the Project Construction phase.

APPLICATION

This Management Plan applies to the Project Construction phase only. It applies to construction work activities under the control of SPV, of EPC Contractor and to all KİP employees.

DEFINITIONS

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or "KİP" or simply "Project"):	Kocaeli Integrated Health Campus Project, being executed by SPV or its affiliates
EPC Contractor (or simply EPC):	Gama – Türkerler Kocaeli Adi Ortaklığı & Gama Türkerler Dubai
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the EPC Contractor's personnel
Environmental and Social Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the environmental, social, health and safety aspects of the KİP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance
Guidelines to EPC Contractor	Guidelines to EPC Contractor for the development of its own ESMS and associated EPC Contractor Procedures appropriate to the nature and scale of the Project are contained in SPV ESMS documentation. SPV ESMS documentation, identify also minimum requirements and specific responsibilities for EPC Contractor in line with the EPC contract
Construction Site	The Construction Site includes all areas impacted in any manner by the construction activities.
Environmental and Social Management Plans (ESMPs)	Plans issued by SPV addressing significant Environmental and Social aspects (as identified in the ESA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.
EPC Contractor Procedure	A procedure to be prepared by EPC Contractor, to be used by EPC Contractor to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.

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KİP	Kocaeli Integrated Health Campus Project
SPV	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Golder	Golder Associates Turkey Ltd. Şti.
BAT	Best Available Technology
CCMP	Construction Camp Management Plan
EBRD	European Bank for reconstruction and Development
EDC	Export Development Canada
EHS	Environmental, Health and Safety
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ES	Environmental and Social
ESHS	Environmental, Social Health and Safety
ESA	Environmental and Social Assessment
ESMP(s)	Environmental and Social Management Plan(s)
ESMS	Environmental and Social Management System
ESAP	Environmental and Social Action Plan
EU	European Union
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HS (or OHS)	(Occupational) Health and Safety
IFC	International Finance Corporation
IFC, EBRD WA GN	Workers' accommodation: processes and standards A guidance note by IFC & EBRD
ISO	International Organization for Standardization
KPI	Key Performance Indicators
OHSAS	Occupational Health and Safety Assessment Scheme
OPIC	Overseas Private Investment Corporation
PR	Performance Requirement (issued by EBRD)
PS	Performance Standard (issued by IFC)
QRA	Quantitative Risk Analysis
SEP	Stakeholder Engagement Plan
WHO	World Health Organization

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CONSTRUCTION CAMP MANAGEMENT AND MONITORING PLAN**1.0 PURPOSE AND SCOPE OF THE PLAN**

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with Turkish regulatory framework, with EBRD Performance Requirements (in particular PR2), with IFC Performance Standards (in particular PS2) and IFC General and Sector Specific EHS Guidelines, OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The purpose of the plan is to define the actions to manage the workers' onsite accommodation during the construction activities during the Site construction and comply with Turkish legislation and/or IFC and EBRD requirements.

The plan defines the requirements for location and construction of workers' accommodation, including the transport systems provided, general living facilities, rooms/dormitories facilities, sanitary facilities, canteen and cooking facilities, food safety, medical facilities and leisure/social facilities during the Site construction activities of KIP, which is located in Kocaeli Province, Turkey.

2.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this plan that are applicable for, but not limited to, the Project during Construction phase.

A number of qualitative performance parameters have been identified in Section 4 below, derived from ESA commitments, Turkish legislation and/or IFC, EBRD and EHS Guidelines as well as from GIIP.

2.1 National standards and regulations

Title	Turkish Reg. Gaz. Date
Republic of Turkey-Constitution- No 2709	1982, Amended 2011
Labor Law and associated regulations on working conditions	25134, 10/06/2003
Occupational Health and Safety Law and associated regulations on working conditions	28339, 30/06/2012
Regulation on Occupational Health and Safety at Construction Works	28786, 05/10/2013
Regulation on Health and Safety Measures to be Taken in Workplace	28710, 17/07/2013

2.2 International standards

Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC – International Finance Corp.	IFC PS2 Labor and Working Condition
IFC – International Finance Corp.	IFC GN2 Labor and Working Condition
IFC – International Finance Corp.	IFC General EHS Guidelines: Occupational Health and Safety
IFC – International Finance Corp.	IFC General EHS Guidelines: Construction and Decommissioning
IFC – International Finance Corp.	IFC General EHS Guidelines: Health Care Facilities

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Source	Document Title
IFC – International Finance Corp. EBRD – European Bank for Reconstruction and Development	Workers' accommodation: processes and standards A guidance note by IFC and the EBRD
EBRD – European Bank for Reconstruction and Development	EBRD PR2 Labor and Working Condition
EBRD – European Bank for Reconstruction and Development	EBRD Sub-sectoral Environmental and Social Guidelines: Health Services and Clinical Waste Disposal
OPIC - Overseas Private Investment Corporation	OPIC - Environmental and Social Policy Statement
International Organization for Standardization	ISO 14001:2004 - Environmental management systems -- Requirements with guidance for use
OHSAS Project Group	OHSAS 18001 - Occupational health and safety management systems – Requirements

2.3 Source documents

This section presents source documents, i.e. documents where SPV commitments are sourced from and that are the trigger for the development and implementation of the ESMPs and in general of the ESMS documentation. They are in turn based on Turkish regulatory framework, EBRD Performance Requirements and IFC Performance Standard and Guidelines.

Document ID	Document Title
ESA Report	Environmental Social Assessment (January, 2016)

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Principal roles and responsibilities for the implementation of this plan are outlined below.

3.1 EPC Contractor & Subcontractors

EPC Contractor has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan. Camp Manager(s) will be appointed in order to manage all workers' issues related to the accommodation.

EPC Contractor have to ensure the effective implementation of this plan by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities under EPC Contractor's responsibility. The EPC Contractor procedures has to include a description of allocated resources, responsibilities and communication procedures to relevant personnel.

EPC Contractor has to provide relevant monitoring data and monitoring reports to SPV as indicated in section 7 "Reporting" of this plan.

If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor's procedures under the EPC Contractor supervision.

EPC Contractor have to establish and implement a Grievance Mechanism in line with the principles established by SPV in the Grievance Mechanism Procedure (KIP-ESMS-GMP-001) for its workers' grievances.

3.2 SPV

SPV Management has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SPV's responsibility. SPV Management is responsible for:

- Construction Camp Management Plan final approval;
- Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on HSE Manager proposed approach.

SPV HSE Manager, HR Manager and Site Manager (in coordination) are responsible for:

- ensuring that this Plan is up to date and appropriate to the nature and scale of KIP and ensuring that this Management Plan is implemented effectively by EPC Contractor;
- ensuring that action/measures and monitoring activities directly under SPV responsibilities are carried out timely and adequately according to this Management Plan requirements;
- proposing to SPV Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions;

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- programming inspections and audit activities to ensure the correct implementation of this Management Plan and of EPC Contractor's Plan;
- addressing Non-Conformities through the definition of Preventive/Corrective actions;
- bringing major Non-Conformities immediately to the attention of SPV Management;
- collecting, organizing and reviewing monitoring data and performance monitoring reports and providing summary results of such reports to SPV Management, to stakeholder and to Lenders.

4.0 MANAGEMENT METHODS AND MITIGATION MEASURES**4.1 General management criteria**

During the Construction phase of the Project, temporary and permanent workforce will be accommodated in construction camp.

Accommodation of the workforce and conditions of the camps will be in compliance with applicable national laws and regulations and with IFC and EBRD requirements (in particular with IFC PS2 and EBRD PR2 - Labor and Working Conditions) and with IFC/EBRD Guidance on Workers' accommodation.

4.2 Specific management methods and mitigation measures

The following table details the management methods and mitigation measures/actions identified for construction camp management in the Construction phase.

For each method and measure/action identified, the table shows:

- The identification code (ID.)
- the reference (or source) documents (i.e. ESA, Turkish Regulations, permits, IFC Performance Standards, EBRD Performance Requirements and EHS Guidelines, OPIC or other GIIP)
- frequency/timing of the measure/action, as applicable
- Key Performance Indicator (KPI), if applicable, and related quantitative target or qualitative acceptance criteria;
- related responsibility for implementing the measure/action.

For the measures actions where no KPI can be identified the cells reports "n.a." (not applicable). In this case an on/off acceptance criteria will apply; in other words the acceptance criteria set is a qualitative one, such as "the measure/action has been implemented effectively".

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
Workers' Accommodation						
CCM-01	IFC PS2 §12 EBRD PR2 §24 IFC, EBRD WA GN Turkish Labor Law and Regulations	Policies and procedures on the quality and management of the accommodation and provision of basic services (either provided directly or by third parties) will be established in line with IFC, EBRD WA GN and implemented. Basic services requirements refer to minimum space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, noise, fire and disease-carrying animals, adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting, and dedicated medical services.	ongoing	n.a.	Basic services provided	EPC Contractor
CCM-02	IFC, EBRD WA GN Part II.I.B	Good standards in living facilities will be ensured in order to avoid safety hazards and to protect workers from diseases and/or illness resulting from humidity, bad/stagnant water (or lack of water), cold, spread of fungus, proliferation of insects or rodents as well as to maintain a good level of morale. Living facilities have to be built using adequate materials and always have to be kept in good repair, clean and free from rubbish and other refuse. A list of main standards to be met (albeit not exhaustive) is presented below: <ul style="list-style-type: none"> • Accommodation facilities will be provided with adequate heating, cooling and ventilation systems; • Facilities will be provided with both natural and artificial lighting (e.g. window surfaces of 5%-10% of flooring surface); • Workers will be guaranteed access to an adequate amount of free potable water for drinking and personal hygiene uses. Drinking water must meet national drinking water standards and its quality must be regularly monitored; • Wastewater, sewage water and other waste materials will be disposed of according to national legislation. 	ongoing	n.a.	Good standards ensured and complied with	EPC Contractor
CCM-03	IFC, EBRD WA GN Part II.I.B	The location of facilities is important to prevent exposure to wind, fire, flood and other natural hazards. Worker's accommodation has to be unaffected by the environmental or operational impacts of the worksite (for example noise, emissions of dust) but is sufficiently close that workers do not have to spend undue amounts of time travelling from their accommodation to worksite.	ongoing	n.a.	Adequate location	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
CCM-04	IFC, EBRD WAGN Part II.I.C Turkish Labor Law and Regulations	<p>Rooms and dormitory facilities will be designed and built so that workers can rest properly and maintain good standards of hygiene. Rooms/dormitories will be kept clean and in good conditions, exposure to noise and odour must be minimized. Room/dormitory design should strive to offer workers a maximum of privacy and all facilities must be single sex. A list of main standards to be met (albeit not exhaustive) is presented below:</p> <ul style="list-style-type: none"> • Rooms/dormitories are kept in good condition and cleaned at regular intervals • With regards to density, minimal floor space must be of 4-5.5 m² per worker, with a minimum ceiling height of 2.1 m. • Each worker is provided with comfortable mattress, pillow, cover and clean bedding which are washed frequently. 	ongoing	n.a.	Rooms and dormitory facilities standards met	EPC Contractor
CCM-05	IFC, EBRD WAGN Part II.I.D Turkish Labor Law and Regulations	<p>Workers must be able to maintain a good standard of personal hygiene and contamination or spread of disease must be prevented through the use of adequate equipment and procedures. A list of main standards to be met (albeit not exhaustive) is presented below:</p> <ul style="list-style-type: none"> • Sanitary and toilet facilities will be built in materials that are easily cleanable, and are cleaned frequently and kept in working conditions • An adequate number of sanitary and toilet facilities will be provided (at a minimum 1 unit for 15 people) and conveniently located in the same building as rooms and dormitories. • An adequate number of hand-wash and shower facilities will be provided (at minimum 1 unit for 15 people) and conveniently located in the same building as rooms and dormitories; 	ongoing	n.a.	Sanitary standards met	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
CCM-06	IFC, EBRD WAGN Part II.I.E	<p>Good standards of hygiene will be maintained in canteen/dining and cooking facilities. If caterers are contracted to manage kitchens and canteens, they must take into account and implement the same standards. A list of main standards to be met (albeit not exhaustive) is presented below:</p> <ul style="list-style-type: none"> • Canteens will have a reasonable amount of space (minimum 1.5 m² per person) and will be adequately furnished; • Kitchens will be designed, built and equipped so to maintain an adequate personal hygiene and to permit food hygiene practices, including protection against contamination. 	ongoing	n.a.	Hygiene standards in canteen/dining and cooking facilities met	EPC Contractor
CCM-07	IFC, EBRD WAGN Part II.I.F	Safe and nutritious food will be provided to workers, in order to guarantee their wellbeing and productivity. The WHO 5 keys to safer food or an equivalent process will be implemented. Food served to workers will contain an appropriate level of nutritional value and will take into account religious/cultural backgrounds and needs.	ongoing	n.a.	Adequate food	EPC Contractor
CCM-08	IFC, EBRD WAGN Part II.I.G	Access to adequate medical facilities and services is provided to workers; an adequate emergency response system must be put into place.	ongoing	n.a.	Adequate access to medical facilities	EPC Contractor
CCM-09	IFC, EBRD WAGN Part II.I.H	Basic leisure and social facilities will be provided to workers, in order to increase workers' welfare and to reduce the impacts of the presence of workers in the surrounding facilities. Basic collective social/rest spaces will be provided (e.g. multipurpose halls, TV rooms, etc.). In addition, the EPC contractor should consider providing recreational/sport facilities. Communication systems such as internet connection will be provided at an affordable or free cost.	ongoing	n.a.	Basic leisure and social facilities available	EPC Contractor
CCMP-10	IFC, EBRD WAGN Part II.II.C and D	Security will be guaranteed to workers and their property (personal belongings) on site.	ongoing	n.a.	Security of workers and their personal belongings ensured	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
CCM-11	IFC, EBRD WA GN Part II.II.E	The accommodation services will be provided in a manner consistent with the principles of non-discrimination and equal opportunity. Workers' accommodation arrangements should not restrict workers' freedom of movement or of association. Workers' gender, religious, cultural and social backgrounds must be respected. Workers must be made aware of their rights and obligations and must be provided with a copy of the internal accommodation rules, procedures and sanction mechanism.	ongoing	n.a.	No restrictions of freedom, movement or association	EPC Contractor
CCM-12	IFC, EBRD WA GN Part II.II.F	Workers must be made aware of the Grievance Mechanism and know that any concern or complaint regarding accommodation may be submitted through the Grievance Mechanism.	ongoing	n.a.	Workers informed regarding grievance mechanism	EPC Contractor
CCM-13	IFC, EBRD WA GN Annex 1	During the workers' accommodation design and planning process the Annex Checklist provided in the IFC and EBRD Guiding Notes on Workers' Accommodation must be followed to ensure that the document's requirements are met. Results of checklist filling will be communicated and discussed with SPV.	ongoing	n.a.	Guidance checklist used	EPC Contractor

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5.0 MONITORING

The following table details the monitoring activities identified for workers' accommodation in the Construction phase.

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

- The identification code (ID.)
- the reference (or source) documents (i.e. ESA, Turkish standard, permits, IFC Performance Standards, EBRD Performance Requirements and EHS Guidelines, OPIC or other GIIP);
- frequency/timing of the measurement;
- Key Performance Indicator (KPI), and related quantitative target, if the target consist of a regulatory limit this will be indicated;
- the related responsibility for implementing the monitoring activity.

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ID.	Source doc.	Monitoring Action/Measure description	Frequency/Timing	KPI	Target/ Acceptance criteria	Responsibilities
CCM-14	IFC PS2 §12 EBRD PR2 §24 IFC, EBRD WA GN Turkish Labor Law and Regulations	Workers' accommodation condition	Monthly	n.a.	N.A. (1)	EPC Contractor to monitor workers' condition and report SPV for collecting reports
CCM-15	IFC, EBRD WA GN Part II.I.F	Quality of foods	Half-yearly	n.a.	N.A. (1)	EPC Contractor to monitor quality of foods and report SPV for collecting reports
CCM-16	IFC, EBRD WA GN Part II.II.F	Grievance Mechanism	See Grievance Mechanism Procedure	See Grievance Mechanism Procedure	See Grievance Mechanism Procedure	EPC Contractor to record and provide data about grievances in accordance with the Grievance Mechanism Procedure SPV for collect data

(1) - This processes and their results are not under complete control of SPV and EPC Contractor; therefore no acceptance criteria has been indicated.

CONSTRUCTION CAMP MANAGEMENT AND MONITORING PLAN**6.0 AUDIT AND REVIEW**

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in “Internal audit” Section of the “ESMS Manual”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SPV HSE Department.

Internal auditing will address:

- The correct implementation of this Management Plan;
- The correct development and implementation of EPC Contractor’s Procedures;
- The correct and timely implementation of an auditing and review system by the EPC Contractor;
- Each of the point indicated in the table in section 4 (mitigation actions/measures) of this plan.

During the inspections, the audit team will address in particular:

- Undesired camp conditions;
- Grievance records of employees;
- Workers’ accommodation conditions.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SPV Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary according to the indications included “Management Review” Section of the “ESMS Manual”.

7.0 REPORTING

Evidences of the implementation of the mitigation actions/measures (detailed in section 4 of this plan) and related results are collected through inspection and auditing activities as detailed in section 6 “Audit and Review” of this plan; these evidences are described in the audit reports.

Reporting activities for this management plan is mainly related to:

- Main figures regarding the implementation of Worker’s accommodation IFC/EBRD guidance (EPC Contractor);
- Main figures regarding undesired camp issues;

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- Main figures regarding workers' grievances and corrective actions adopted, including average time necessary for the resolution of grievances (SPV/EPC Contractor);
- Collection, aggregation and recording of the data (SPV).

These data together with the results of the inspection and audit activities will be summarized in a Report on a six monthly basis that will be made available to stakeholders which is under the responsibility of SPV. This report constitutes the basis for the monitoring report to be available for the Lenders.