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LABOUR'S SAFETY AND TRAINING RECORD KEEPING PROCEDURE**PURPOSE SCOPE**

This Procedure 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 Statements and EDC. The purpose of this Procedure is to define the actions for the safety and training record keeping.

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

APPLICATION

This Procedure applies to the Project Construction phase only; the Operation phase aspects will be addressed in separate documents. It applies to construction work activities under the control of SPV, of EPC 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 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.

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EPC Contractor Procedure A procedure to be prepared by EPC, to be used by EPC to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented

ACRONYMS

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
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
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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LABOUR'S SAFETY AND TRAINING RECORD KEEPING PROCEDURE**1.0 PURPOSE AND SCOPE OF THE PROCEDURE**

This Procedure 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 PR 2 and PR 4), IFC Performance Standards (In particular PS 2), IFC General EHS Guidelines, 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 Procedure is to define the actions (ref. § 4.0) to be implemented for the safety and training record keeping in compliance with the Turkish legislation and/or IFC and EBRD requirements.

1.1 Definition of terms which should be recorded in the Project

Hazard: Anything with the potential to cause harm, such as chemicals, electricity, work on ladders, an unguarded machine, an open drawer, demanding and stressful work, etc.

Near Miss: An event, not necessarily defined under national laws and regulations that could have caused harm to persons at work or to the public, e.g. a brick that falls off scaffolding but does not hit anyone.

Occupational disease: Covers any disease contracted as a result of an exposure to hazards arising from a work activity e.g. asthma resulting from exposure to wood dust or chemical compounds.

Environmental Incident: An event that resulted or has the potential to result in impact to the environment.

First Aid Injury: any one-time treatment, and any follow-up visit for the purpose of observation, of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care.

Lost Time Injury: the injury, illness or disease that justifies time away from work for medical treatment or recuperation and affects the employee beyond the day of the injury.

Medical Treatment Injury: an injury for which more than first aid treatment was provided by a physician, dentist, chiropractor, etc., but does not result in work days lost.

Restricted Duties: The employee is assigned alternate duties as a result of a job-related injury, and is physically or mentally unable to perform all aspects of their normal assignments.

Property Damage: Damage or destruction of any property or loss of a process as a result of an incident.

Security Incidents: Incidents such as assault, breach of confidentiality, burglary, civil disorder, vandalism and sabotage, unauthorized access, and possession of alcohol, drugs, or weapons.

LABOUR'S SAFETY AND TRAINING RECORD KEEPING PROCEDURE**2.0 BACKGROUND POLICIES AND STANDARDS**

This section includes all those policies, standards and requirements of reference for this procedure 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
Law No. 6331 on Occupational Health and Safety	28339, 30/06/2012
Regulation on Procedures and Principles of Health and Safety Training for Employees	28648, 15/05/2013

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
EBRD – European Bank for Reconstruction and Development	EBRD PR2 Labor and Working Condition
EBRD – European Bank for Reconstruction and Development	EBRD PR4 Health and Safety
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 Env. and Social Policy Statements
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 Reports	Environmental Social Assessment (January, 2016)

LABOUR'S SAFETY AND TRAINING RECORD KEEPING PROCEDURE**3.0 ROLES AND RESPONSIBILITIES**

Principal roles and responsibilities for the implementation of this procedure 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 Procedure.

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

EPC Contractor is responsible to collect the HSE statistics (including all types of training delivered to their staff according to Training Plan) on a monthly basis and report to SPV.

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

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:

- This Procedure's and EPC Contractor Procedure's final approval;
- taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on HSE Manager proposed approach and actions;
- SPV HSE Department is responsible to collect the HSE statistics of its employees and collate the HSE records from EPC Contractor on a monthly basis.

SPV HSE Manager is responsible for:

- ensuring that this Procedure is up to date and appropriate to the nature and scale of the KIP and ensuring that this Procedure 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 Procedure requirements;
- proposing to SPV Management, if necessary, amendments and/or updates to this Procedure and issuing procedure revisions;

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- programming inspections and audit activities to ensure the correct implementation of this Procedure and of EPC Contractor's Procedure;
- 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 from EPC Contractor and providing summary results of such reports to SPV Management, to stakeholders and to the Lenders.

4.0 MANAGEMENT METHODS**4.1 Safety Records (HSE Statistics)**

SPV HSE Department is responsible to collect the HSE statistics of its employees and collate the HSE records from EPC Contractor on a monthly basis.

EPC Contractor is responsible to collect the HSE statistics on a monthly basis and report to SPV. EPC should set up its own Procedure to collect HSE statistics from its Subcontractors.

Monthly safety data will have two sections of "HSE Activities" and "Incident Statistics". Monthly HSE Statistics Report format is given in Appendix 1 of this Procedure.

4.2 Training Records

EPC Contractor is responsible to keep the records of all types of training delivered to their staff according to Training Plan. If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedure under the EPC Contractor supervision.

Training Participation Form is given in Appendix 2 of this Procedure. Employees who are attending any type of H&S training are required to sign Training Participation Form.

Training statistics will be reported on the monthly basis as a part of HSE Statistics Report which is given in Appendix 1 of this Procedure.

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5.0 MONITORING

The following table details the monitoring (measurement) activities identified for the safety and training record keeping management 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 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
LST-01	Law No. 6331 IFC PS2, EBRD PR4,	EPC Contractor to record and aggregate monthly HSE statistics	Ongoing	All data to be provided in Appendix 1	100%	EPC Contractor for providing aggregated monthly data SPV for collecting data

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6.0 AUDIT AND REVIEW

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

EPC Contractor will set up its own EPC Contractor Procedure in line with this Procedure which will include the Audit Program to inspect the implementation of the control measures listed in section 4. EPC Contractor will submit its internal audit reports to SPV on an agreed frequency.

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

Internal auditing will address:

- The correct implementation of this Procedure;
- The correct development and implementation of EPC Contractor Procedure;
- The correct and timely implementation of an auditing and review system by the EPC Contractor;
- Each of the point indicated in the tables in Section 4 (actions/measures) of this procedure.

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

- Employee names will be selected randomly and appropriate training records will be audited by checking the signatures in the Training/Awareness Participation forms.

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 in "Management Review" Section of the "ESMS Manual".

LABOUR'S SAFETY AND TRAINING RECORD KEEPING PROCEDURE**7.0 REPORTING****7.1 *Audit reports (by SPV)***

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

7.2 *EPC Contractor Monitoring Reporting*

EPC Contractor is responsible to collect the HSE statistics (including all types of training delivered to their staff according to Training Plan) on a monthly basis and report to SPV. If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedure under the EPC Contractor supervision.

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

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APPENDIX 1 – MONTHLY HSE STATISTICS REPORT

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MONTHLY HSE STATISTICS REPORT												
HSE Activities	Jan 16	Feb 16	Mar 16	Apr 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec16	Total
Turkish Occupational Health & Safety Training												
Other H&S Training (i.e. Firefighting, first aid training etc.)												
Toolbox Meetings												
HSE Committee Meetings												
JHAs Completed												
HSE Audits Completed												
HSE Investigations Completed												
Incident Statistics	Jan 16	Feb 16	Mar 16	Apr 16	Jun 16	Jul 16	Aug 16	Sep 16	Oct 16	Nov 16	Dec16	Total
Hazards Reported												
Near Miss Incidents												
Property Damage												
Environmental Incidents												
First Aid Injury, FAI												

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Medical Treatment Injury, MTI												
Restricted Duties												
Lost Time Injury, LTI												
Security Incidents, SI												
Fatality or Permanent Disability												
Number of Lost Work Days												
Number of Contractor Personnel												
Contractor Manhours Worked												
Subcontractor Manhours Worked												
Total Manhours Worked												

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APPENDIX 2 - TRAINING/AWARENESS PARTICIPATION FORM

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TRAINING/AWARENESS PARTICIPATION FORM

Course ID.		Date	
Location		Duration (hr)	
Title and Subject			
Learning verification			
Trainer - 1		Signature	
Trainer - 2		Signature	

N	Name	Surname	Role	Examination	Signature
1					
2					
3					
4					
5					
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13					

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N	Name	Surname	Role	Examination	Signature
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