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LABOUR'S ACCIDENT AND INCIDENT 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 document is to define labour's accident and incident record keeping procedure.

It includes guidelines and minimum requirements for EPC Constructor 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.
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

LABOUR'S ACCIDENT AND INCIDENT RECORD KEEPING PROCEDURE**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
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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LABOUR'S ACCIDENT AND INCIDENT 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 procedure (ref. § 4.0) to be implemented for the accident and incident record keeping in compliance with the Turkish legislation and/or IFC and EBRD requirements.

The overall objective is to record all project related incidents and investigate at an appropriate level to prevent reoccurrences.

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 ACCIDENT AND INCIDENT 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 Occupational Health and Safety Risk Assessment	28512, 29/12/2012

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 Report	Environmental Social Assessment (January, 2016)

LABOUR'S ACCIDENT AND INCIDENT 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 have to record all work related accidents and incidents and should report HSE Statistics to SPV on a monthly basis.

If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor Procedure 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.
- develop and maintain a system (i.e. database) to ensure that corrective and preventive actions are identified, tracked and closed out effectively to minimize the recurrence of any non-conformance and to reduce the severity and duration of the impact of the non-conformance.
- set up a proper system to investigate all injuries (no matter how minor) and all serious incidents with a risk rating of high or immediate (incidents which could result in serious injuries).

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;

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- 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
- 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 General Management Criteria

- The Project will ensure that all project related accidents and incidents (definitions given in Section 1.1) are identified, reported and investigated at an appropriate level to prevent recurrences.
- The Project Management will encourage employees to report their observations during construction activities.
- The system will enable employees to report immediately to their immediate supervisor any situation they believe presents a serious danger to life or health.
- The system will enable all injuries and serious incidents to be investigated at an appropriate level with a system to be established by SPV.

4.2 Specific Management Methods

The following table details the management methods/actions for the management of accident incident record keeping in the Construction phase.

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

- The identification code (ID.)

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- the reference (or source) documents (i.e. ESA, Turkish Regulations, permits, IFC Performance Standards, EBRD Performance Requirements and EHS Guidelines 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.	ACTION/MEASURE DESCRIPTION	FREQUENCY/TIMING	KPI	TARGET/ACCEPTANCE CRITERIA	RESPONSIBILITIES
Management controls						
LAI-01	Law No. 6331 IFC General EHS Guideline IFC PS2, EBRD PR4, GIIP	Training of employees about Accident-Incident Reporting, <ul style="list-style-type: none"> • Employees will be trained about the importance of accident-incident reporting • The training will include how to complete Incident Report Form • The training, system and the employer should further enable and encourage workers to report to management all accidents and incidents. 	ongoing	Training attendance (at least 90% of staff)	Training is completed for all employees and refreshed on a regular basis	EPC Contractor under supervision of SPV
LAI -02	Law No. 6331	Cease Work Authority, <ul style="list-style-type: none"> • Employees should report immediately to the H&S Committee (or employer where there is no H&S Committee) any situation they believe presents a serious danger to life or health. • H&S Committee should meet immediately to give a decision about the situation. Employer gives the decision and the case is reported. Employee and employee representative are notified in writing about the decision of the employer. • Employees can leave the danger area where there is unavoidable risk. Employees’ rights should not be restricted because of their act. 	ongoing	n.a.	Employees are aware of their rights, procedure is effectively implemented	EPC Contractor under supervision of SPV
LAI -03	Law No. 6331 IFC PS2, EBRD PR4, GIIP	Accident-Incident Reporting and Record Keeping, <ul style="list-style-type: none"> • SPV will develop and maintain a system (i.e. database) to ensure that corrective and preventive actions are identified, tracked and closed out effectively to minimize the recurrence of any non-conformance and to reduce the severity and duration of the impact of the non-conformance. • Incident Report Forms (Appendix 1) will be readily available in local language of employees at different locations (i.e. HSE Department, rest areas etc.) on site for employees to fill and submit to EPC HSE Manager who will then report to SPV HSE Manager. • SPV will set up a proper system to investigate all injuries (no matter how minor) and all serious incidents with a risk rating of high or immediate (incidents which could result in serious injuries). 	ongoing	n.a.	Incident Reports, Incidents Database effectively implemented	EPC Contractor, SPV

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ID.	SOURCE DOC.	ACTION/MEASURE DESCRIPTION	FREQUENCY/ TIMING	KPI	TARGET/ ACCEPTANCE CRITERIA	RESPONSIBILITIES
LAI -04	Law No. 6331	Reporting recordable cases to Social Security Institution, <ul style="list-style-type: none"> • All work related accidents and diseases should be reported to Social Security Institution within three business days beyond the day of the incident. 	If there is a recordable case	n.a.	All recordable cases are reported to Social Security Institution	EPC, Subcontractor or SPV (depending on the employee's social security institution) under supervision of SPV

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5.0 MONITORING

The following table details the monitoring (measurement) activities identified for accident and incident report 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
LAI-05	Act No. 6331 IFC PS2, EBRD PR4,	Record of all work related accidents/incidents.	Ongoing	All accidents/incidents	100%	EPC Contractor
LAI-06	GIIP	All injuries (no matter how minor) and all serious incidents with a risk rating of high or immediate (incidents which could result in serious injuries) are investigated.	Ongoing	All injuries and serious incidents	100%	SPV
LAI-07	Act No. 6331	All work related accidents and diseases should be reported to Social Security Institution within three business days beyond the day of the incident.	Ongoing	All accidents and diseases	100%	SPV
LAI-08	GIIP	EPC Contractor to record and aggregate monthly HSE accident/incident statistics.	Monthly	n.a.	n.a.	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 Appendix N "ESAP" of the "ESA Report".

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.

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 audits and inspections and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary.

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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 will report the number of accidents/incidents on a monthly basis to SPV according to Labour's Safety and Training Record Keeping Procedure.

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.

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APPENDIX 1 - INCIDENT REPORT FORM

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INCIDENT REPORT FORM

Name of person reporting learning:			
Learning type	<input type="checkbox"/> Hazard/Near miss/property damage	<input type="checkbox"/> Injury / disease	<input type="checkbox"/> Environmental <input type="checkbox"/> Security
Incident location	<input type="checkbox"/> Field	<input type="checkbox"/> Office	
Person involved:			
<input type="checkbox"/> SPV	<input type="checkbox"/> EPC Contractor	<input type="checkbox"/> Subcontractor (Name:_____)	<input type="checkbox"/> Visitor <input type="checkbox"/> Member of public
Full name:			Company name:
Address:			Phone number:
Supervisor:			
Date and time of learning			
Date the learning occurred:			Time learning occurred:
Description of learning			
Injury / illness details (if relevant)			
Injury classification:	<input type="checkbox"/> No treatment required	<input type="checkbox"/> First aid injury	<input type="checkbox"/> Medical treatment
	<input type="checkbox"/> Restricted duties	<input type="checkbox"/> Lost time injury	<input type="checkbox"/> Work related illness
Injury type (e.g. bruise, laceration, sprain)			
Body location of injury / illness (e.g. left hand)			
Describe treatment provided and by whom			

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Environment impact (if relevant)		
Type of environmental incident	<input type="checkbox"/> Damage or disturbance	<input type="checkbox"/> Release to land
	<input type="checkbox"/> Release to air	<input type="checkbox"/> Release to water

Risk ranking - Circle the potential risk associated with this learning					
SEVERITY	LIKELIHOOD				
	1	2	3	4	5
1	Acceptable	Acceptable	Low	Low	Moderate
2	Acceptable	Low	Low	Moderate	High
3	Low	Low	Moderate	High	High
4	Low	Moderate	High	High	Immediate
5	Moderate	High	High	Immediate	Immediate

SEVERITY	Value	LIKELIHOOD	Value
Negligible (No visible injury, no pain)	1	Very Unlikely (Freak event – no known history)	1
Slight (Minor cuts, bruises, no long-term effects)	2	Unlikely (Unlikely sequence of events)	2
Moderate (Heavy bruising, deep flesh wound, lost time accident)	3	Possible (Foreseeable under unusual circumstances)	3
Severe (Lost time accidents and major injuries (fractures) etc)	4	Likely (Easily foreseeable, odd incidents may have occurred)	4
Very Severe (Long-term disability or death)	5	Very Likely (Common occurrence – aware of incidents)	5

Immediate causes:	
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Immediate action taken to prevent recurrence:	
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