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EMPLOYEE INFORMATION 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 Statement and EDC. The purpose of this document is to define the employee information record keeping procedure.

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. 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

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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
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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EMPLOYEE INFORMATION 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, IFC Performance Standards, 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 to be implemented for the employee information record keeping in compliance with the Turkish legislation and/or IFC and EBRD requirements.

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
Act No. 4857 Labour Law	25134, 10/6/2003

2.2 International standards

Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC - International Finance Corp.	IFC Performance Standards
IFC - International Finance Corp.	IFC General EHS Guidelines
EBRD	EBRD Performance Requirements
OPIC	OPIC Environmental and Social Policy Statement

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)

EMPLOYEE INFORMATION 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 to keep employee information records of its own employees.

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 SPV HSE Manager proposed approach and actions.
- SPV to keep employee information records of its employees.

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;
- programming inspections and audit activities to ensure the correct implementation of this Procedure and of EPC Contractor Procedure;

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- 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*

All employee information will be recorded in personal files according to Labor Law No. 4857 (Turkish Law Gaz. No. 25134, 10/6/2003).

SPV, EPC Contractor and Subcontractors (if any) will arrange a personal file for each employee employed by them. Personal files will be contained confidential and will be submitted to regulatory authorities as requested.

Human Resources Department will be responsible for each SPV, EPC Contractor and Subcontractor (if any) to keep personal files.

4.2 *Specific management methods*

Personal files will include the following documents;

To be filed before employment:

- Copy of Identity Card
- Identity register copy
- Residence document
- Diploma photocopy
- Health Report
- Blood Group Card
- Criminal Record
- At least 2 photos
- Family status certificate, copy of marriage certificate (if any)

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- Proof of military status
- Employment Contract / Service Agreement
- Social Security Institution (SSI) recruitment declaration
- HSE Training Certificates

To be filed according to the employee's specialties

- Documents showing that employee benefits from government incentives
- Copy of the Disabled Injury Report
- Turkish Employment Organization application registration document for ex-convict, terror-stricken, disabled employees
- Work permit photocopy for foreign workers

To be filed according to the nature of business

- Signed document showing that the consent of the workers for overtime
- Debit voucher for the delivered tools and equipment
- Proper health reports to the nature of the business
- Periodic health reports
- Driver licenses for drivers
- Weekly chart showing the working hours of employee for changing shifts

To be filed while employment continues

- Annual leave, unpaid leave, casual leave and other authorization documents
- Maternity leave reports
- Warnings to employees
- Rest reports
- Signed payroll / wages compass

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- Salary increases, title changes, promotion, transfer notifications, appointment letters,
- Performance evaluation forms
- Refresher H&S Training Certificates and any new H&S Training Certificate
- Periodic Health Reports
- Work accident record
- Document showing the consent of the workers will be temporarily transferred to another workplace
- All official correspondences

To be filed after cease of employment

- SSI cease of employment declaration
- Acquittance
- Working Document / Certificate of Service
- Notice of termination
- Letter of resignation
- Severance and Notice Pay Payroll
- Notary notifications
- Written notice

To be filed if available

- Employment Application Form
- Job Offer Form
- Reference letters
- Resumes
- Documents taken from previous work i.e. work, service certificates

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5.0 MONITORING

The following table details the monitoring (measurement) activities identified 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 and EHS Guidelines, EBRD Performance Requirements, 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
EIR-01	Turkish Labor Law and Regulations	Keeping personal files for each employee.	Ongoing	n.a.	100% of all employees	SPV, EPC Contractor and Subcontractor to prepare personal files for their own staff.

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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".

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 (mitigation actions/measures) of this procedure.

During the inspections, the audit team will address example personal files and ensure that documents are filed properly. Inspectors will not go into details of personal documents during audit.

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

Evidences of the implementation of the mitigation 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.

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.