YELLİCE WIND POWER PLANT PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Document History

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Table of Contents

1. INTRODUCTION 2
   1.1. Purpose 3
   1.2. Scope 3
   1.3. Abbreviations 3
2. ORGANIZATIONAL STRUCTURE 5
   2.1. Project Implementation Organization Chart 5
   2.2. Roles and Responsibilities 6
3. LEGAL REQUIREMENTS 10
   3.1. National Legislation 11
   3.2. International Standards 13
4. OVERLAPS WITH OTHER MANAGEMENT PLANS 15
5. MANAGEMENT MEASURES 17
6. TRAINING 103
7. REVIEW AND UPDATE 103
8. REPORTING 104

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1. INTRODUCTION

Yellice Enerji Üretim A.Ş. (“Yellice Enerji”), a subsidiary of Efor Holding A.Ş., is currently constructing and will operate the Yellice Wind Power Plant (“WPP”) Project (“the Project”), located in the Kangal and Gürün districts of Sivas Province, covering a total area of 870.23 hectares.The Project will consist of 23 wind turbines with a total installed capacity of 160 MWm / 160 MWe, including 21 turbines with 7 Mwe capacity for each, one turbine with 6.8 Mwe capacity, and one turbine with 6.2 Mwe capacity.

Within the scope of the Project, the electricity generated through 23 wind turbines is planned to be connected to the Kangal Transformer Station - Hasan Çelebi Transmission Line and national grid via an overhead Energy Transmission Line (“ETL”) 154 kV with a length of 5+5 km, ensuring reliable and efficient energy transmission.

Regarding access to the Project Area, it is provided from existing village roads that connect to Sivas – Malatya Provincial Road. As part of the Project, some extension and improvement works will be performed on these village roads. Additionally, approximately 7 km long in-site roads (turbine access roads) will be constructed within the scope of the Project.

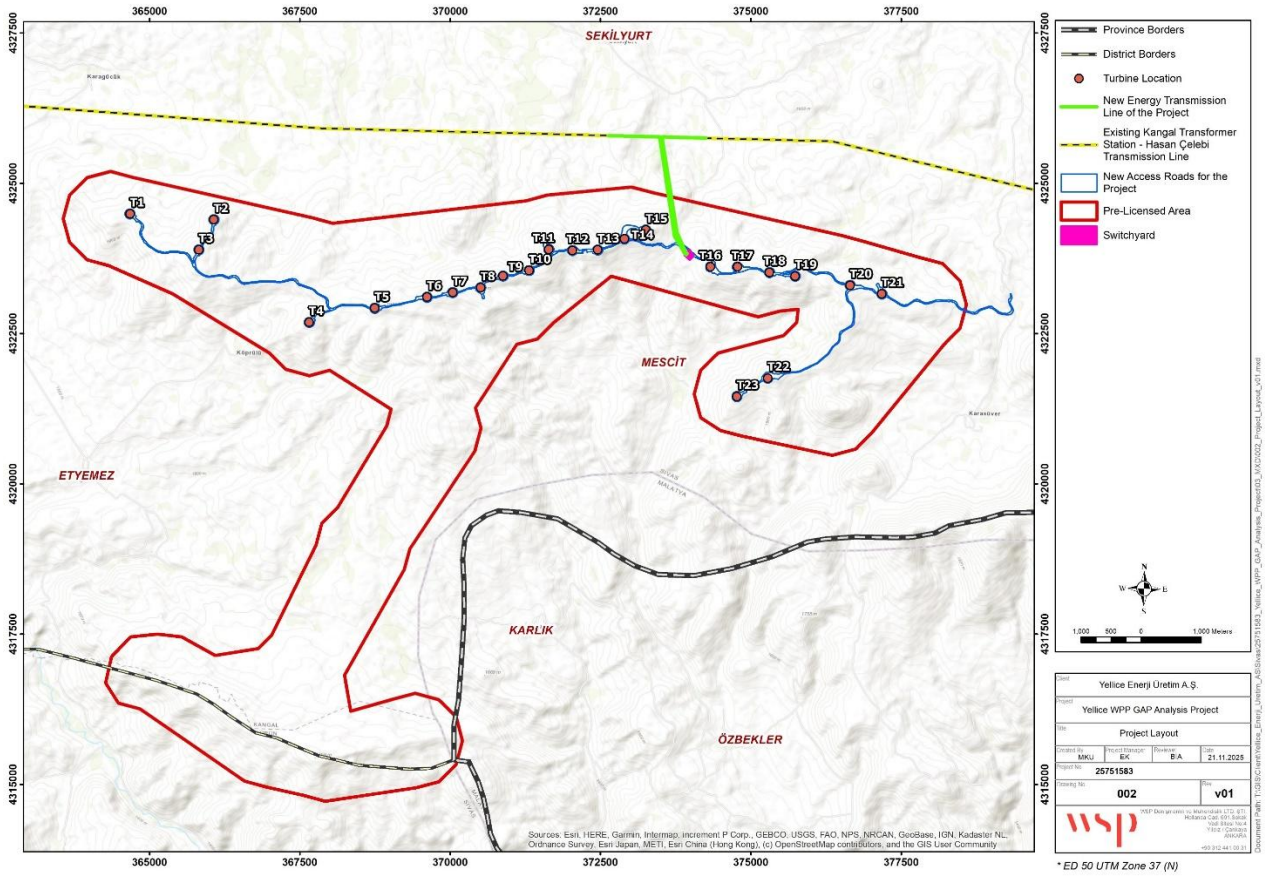


Figure 1: Yellice WPP Project Layout

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1.1. Purpose

The primary objective of the Environmental and Social Management Plan ("ESMP") is to define a clear set of actions on how environmental, social, and health commitments of the Project will be managed during the construction and operation phases of the Project, in accordance with the Project Standards. The ESMP also outlines the management framework for implementing these measures effectively.

The additional objectives of this Plan are as follows:

- To assign roles and responsibilities for the implementation of control measures for environmental, social, and health management;
- To define preventive and mitigation measures aimed at minimizing environmental, social, and health management risks;
- To define relevant Project Standards;
- To ensure consistency with relevant legal requirements and international standards;
- To determine training requirements for the personnel involved; and
- To establish procedures for monitoring, inspection, and reporting.

1.2. Scope

The ESMP is applicable to all Project activities carried out under the Yellice Enerji's supervision, including those performed by contractor, subcontractors and all project personnel. Yellice Enerji holds primary responsibility for implementing the Plan, while contractor and subcontractors are required to comply with the Yellice Enerji's Environmental and Social Management Systems ("ESMS").

This Plan covers all activities during construction and operation phases of the Project that include construction of 23 wind turbines, switchyard, underground cables, ETL and access roads, and operation of the Project.

This Plan includes a brief description of the Project, outlines roles and responsibilities for the implementation of the Plan, relevant Project Standards, preventive and corrective actions, monitoring, training requirements, review and update, and reporting.

1.3. Abbreviations

the Project	Yellice Wind Power Plant Project
Yellice Enerji	Yellice Enerji Üretim A.Ş.
ESMP	Environmental and Social Management Plan
CCTV	Closed-Circuit Television
CLO	Community Liaison Officer

EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health, and Safety
EPs	Equator Principles
EPFIs	Equator Principles Financial Institutions
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ETL	Energy Transmission Line
GHGs	Greenhouse Gases
GIIP	Good International Industry Practice
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labor Organization
LOTO	Logout/Tagout
KPI	Key Performance Indicator
OECD	Organization for Economic Cooperation and Development
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PSs	Performance Standards
RIAPC	Regulation on Industrial Air Pollution Control
SDS	Safety Data Sheet
WBG	World Bank Group
WPP	Wind Power Plant

2. ORGANIZATIONAL STRUCTURE

2.1. Project Implementation Organization Chart

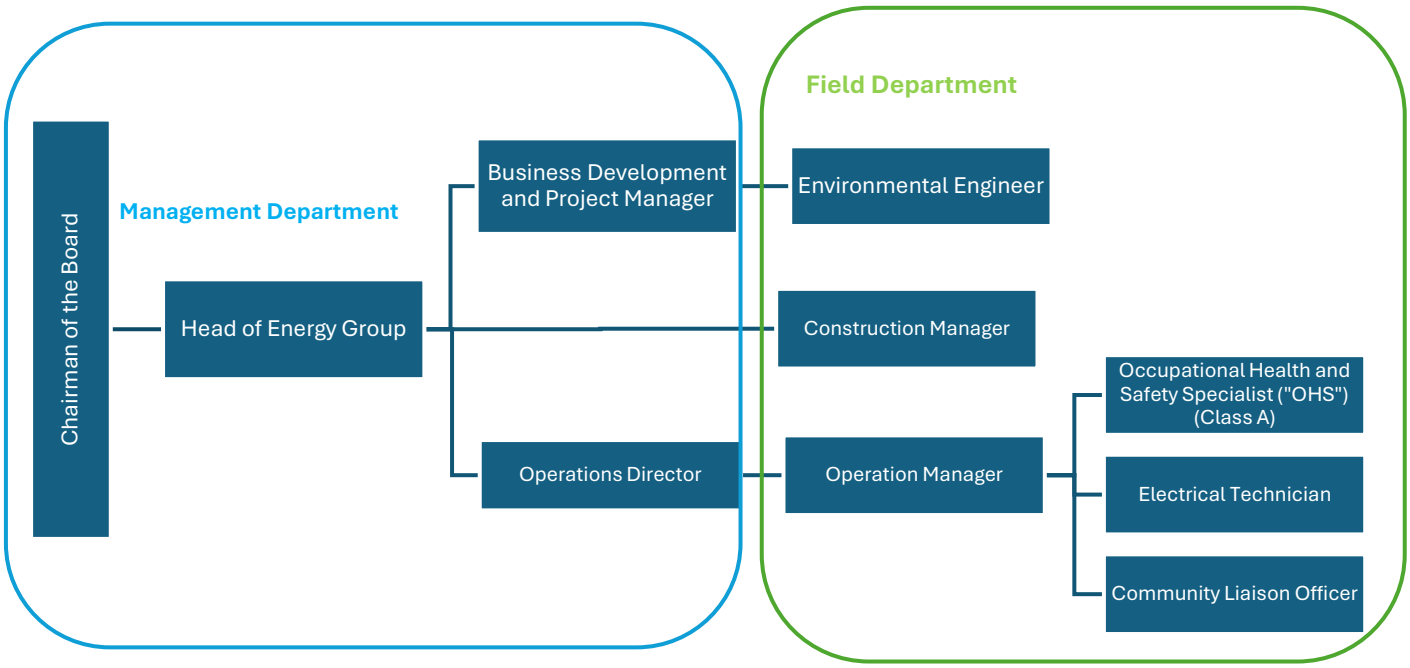
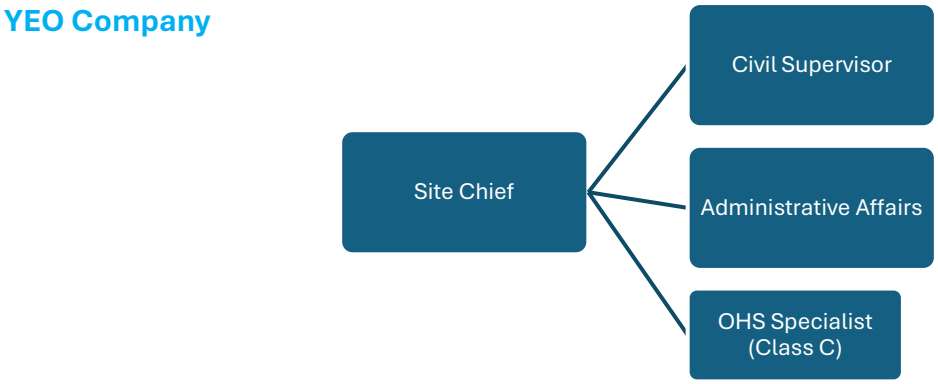
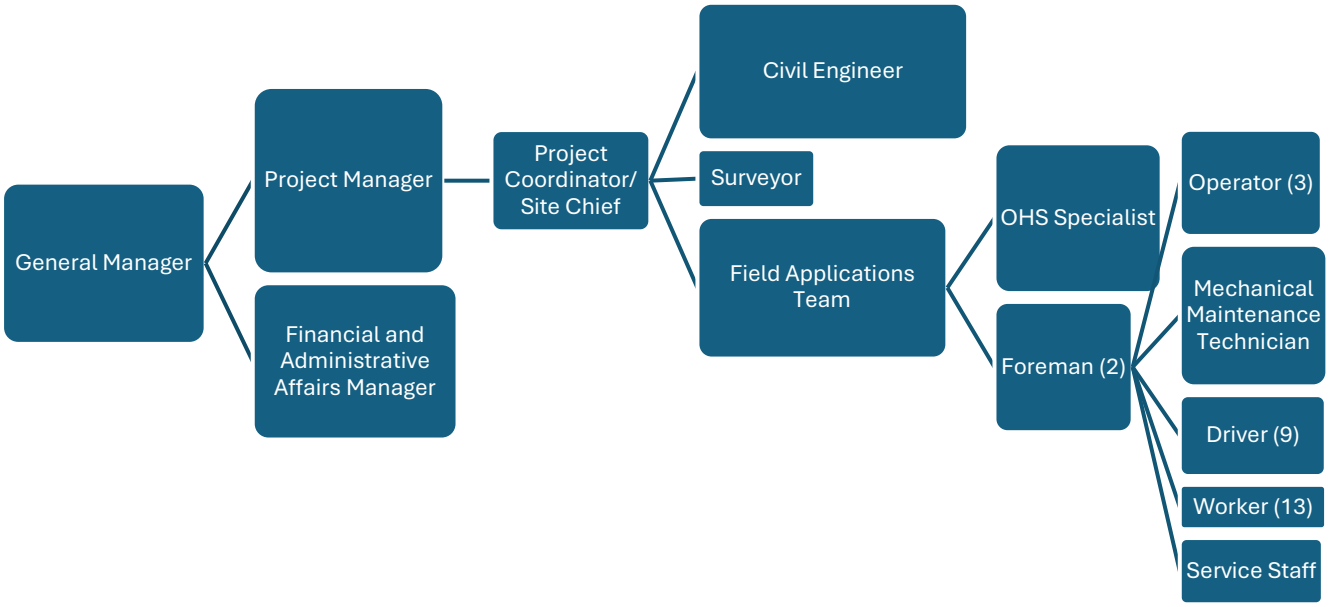


Figure 2: Yellice Enerji Corporate Organization Chart



Şahlin Company



Nordex Company

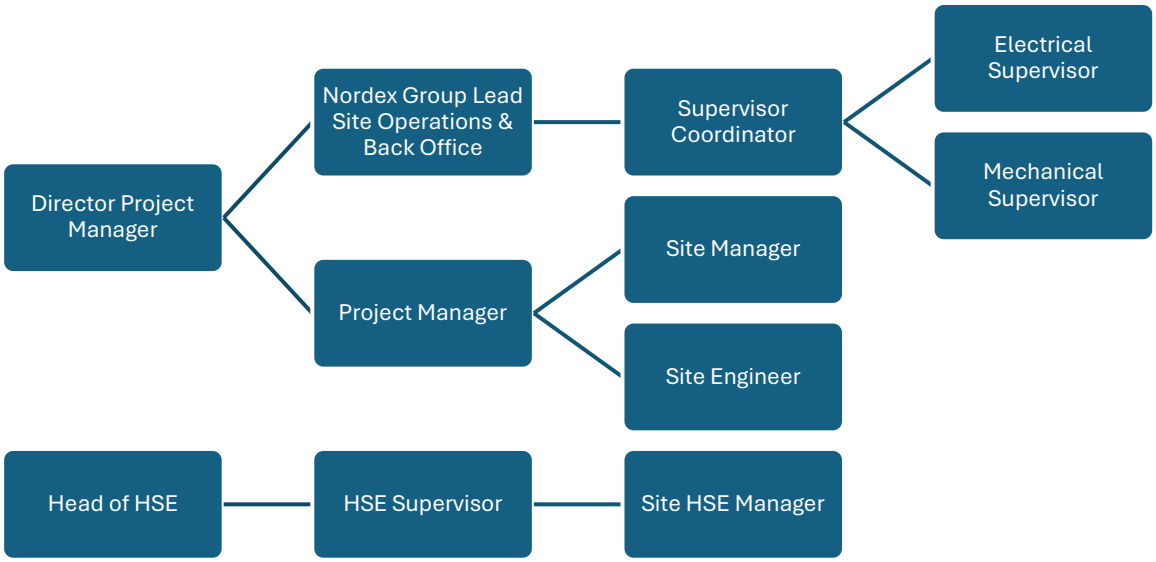


Figure 3: Organization Charts of Project Subcontractors

2.2. Roles and Responsibilities

General roles and responsibilities for the implementation of this Plan are provided in the table below. The roles and responsibilities for the implementation of this management plan are revised according to the changes in the organization structure of the Client.

Table 1: Roles and Responsibilities

Roles	Responsibilities
Chairman of the Board	▪ Provide overall strategic direction for the organization. ▪ Approve high-level decisions, policies, and resource allocations. ▪ Ensure alignment with corporate governance principles.
Head of Energy Group	▪ Provide overall oversight for wind power plant activities and strategic planning. ▪ Ensure project compliance with company policies and sector requirements. ▪ Coordinate with the General Manager and Director on key project decisions.
General Manager	▪ Ensure adequate resources are provided for implementation of this Plan. ▪ Ensure effective implementation of all management plans. ▪ Support project planning, execution, and coordination. ▪ Supervise Director and ensures organizational performance targets are met.
Director	▪ Ensure overall implementation of ESMS and provide strategic guidance. ▪ Oversee management of environmental and social risks. ▪ Oversee the development, review, and approval of Plans and approve updated ESMS documentation. ▪ Coordinate ESMS and project documentation.
Site Chief	▪ Oversee on-site operations and ensure safe, efficient execution. ▪ Conduct the development, review, and approval of Plans and approve updated ESMS documentation. ▪ Ensure all daily inspection results, safety observations, and environmental control logs are transmitted to the Director. ▪ Ensure compliance with project schedules, quality, and ESMS requirements. ▪ Conduct weekly inspections, report issues and monitor daily inspection reports received from Environmental Engineer and Subcontractors' OHS Specialists. ▪ Manage Subcontractors, coordinate installation and inspection.
Operation Manager	▪ Implement daily ESMS activities and monitor compliance.

Roles	Responsibilities
	▪ Provide adequate resources for implementation of ESMPs. ▪ Ensure that all audits related to ESMPs are coordinated and conducted as scheduled. ▪ Ensure that all trainings related to ESMPs are organized and conducted periodically. ▪ Participate in corrective and/or improvement actions as required. ▪ Review training records and supporting documents to ensure contractor compliance with training obligations. ▪ Review periodic audit reports received from OHS Specialist and Environmental Engineer and conduct audits when necessary.
OHS Specialist	▪ Ensure health and safety practices are implemented by workers and subcontractors. ▪ Review training records received from Subcontractors' OHS Specialists and supporting documents to ensure contractor compliance with training obligations. ▪ Provide feedback on non-conformances and follow up on corrective actions. ▪ Review periodic audit reports received from Subcontractors' OHS Specialists and conduct audits when necessary. ▪ Provide regular trainings related with ESMS documentation to all employees and report training records to Site Chief.
Environmental Engineer	▪ Oversee environmental monitoring and mitigation measures. ▪ Ensure compliance with environmental legislation and Project Standards. ▪ Prepare environmental compliance reports and maintain monitoring records. ▪ Conduct/organize periodic environmental site audits. ▪ Provide related training courses to all workers and prepare training records and related training documents.
Administrative Affairs Chief	▪ Manage administrative processes, logistics, and site support functions. ▪ Ensure proper documentation, record-keeping, and coordination with management. ▪ Support HR, procurement, and site-level administrative needs.
Community Liaison Officer ("CLO")	▪ Maintain a record of grievances in the Grievance Database, including details such as the complainant, date of submission, and status (e.g., open, pending, or resolved).

Roles	Responsibilities
	▪ Manage stakeholder engagement and community relations. ▪ Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams. ▪ Provide social related trainings to all employees and report training records to Operation Manager.
Human Resources ("HR") Representative	▪ Conduct workforce planning for the Project and coordinate all recruitment processes. ▪ Ensure employment contracts, personnel files, and all labour records comply with legal requirements. ▪ Manage the worker grievance mechanism, maintain records, and follow up on resolution processes. ▪ Monitor subcontractors' labour practices to ensure compliance with legal and Project requirements. ▪ Organize orientation, OHS, and mandatory training programs and maintain training records. ▪ Collect, analyze, and report gender-disaggregated employment data. ▪ Oversee working conditions, social facilities, and employee welfare arrangements. ▪ Ensure compliance with labour legislation, OHS regulations, and company policies.
Subcontractors ' Project Manager/ Coordinator	▪ Develop its own procedure to fully implement this Plan. ▪ Ensure ESMPs are implemented according to the Project Standards. ▪ Submit weekly and monthly E&S performance reports to Operation Manager. ▪ Ensure immediate reporting of serious incidents or non-compliances to Yellice Enerji Team. ▪ Coordinate implementation of corrective actions based on Yellice Enerji's feedback. ▪ Monitor internal audits and record related non-compliances. ▪ Appoint a responsible person for activities defined in ESMPs. ▪ Ensure relevant site-specific procedures are developed and aligned with ESMPs.
Subcontractors' OHS Specialists	▪ Record and prepare documentation non-compliances according to the Project Standards and report to OHS Specialist. ▪ Report all incidents, non-compliances, and monitoring results to OHS Specialist. ▪ Report incidents and recommend corrective actions. ▪ Participate in corrective and/or improvement actions.

Roles	Responsibilities
	▪ Submit regular OHS statistics and updates to the Yellice OHS Specialist for consolidation. ▪ Provide OHS related trainings to all employees and report training records to OHS Specialist. ▪ Implement all ESMS mitigations and monitoring activities in the Project Area. ▪ Conduct/organize health and safety related periodic site audits.
Subcontractors' Security Personnel	▪ Manage and coordinate all security issues at the Project Area. ▪ Report all security issues to the Subcontractors' Project Manager/Coordinator. ▪ Involve in the investigation team for the investigation of the security incidents. ▪ Propose necessary security measures as needed in cases such as changed circumstances or other threat perceptions. ▪ Ensure all mitigation measures and management controls established in this Plan are implemented properly.
All Employees	▪ Participate in the trainings. ▪ Ensure compliance with management measures. ▪ Report unsafe conditions or deviations from ESMPs to their supervisors.

3. LEGAL REQUIREMENTS

This section includes policies, standards and requirements of reference for this Plan. All activities to be carried out during the construction and operation phases of the Project will be carried out in accordance with:

- Applicable local, national, and regional environmental, social, health, and safety laws and regulations, including Türkiye's obligations under international law relevant to the Project;
- International Law, Conventions, and Treaties adopted by Türkiye and relevant to the Project;
- The Equator Principles (EPs IV, June 2020);
- The Organization for Economic Cooperation and Development ("OECD") Common Approaches;
- The International Finance Corporation ("IFC") Performance Standards ("PSs") and associated Guidance Notes (January 2012, last updated June 14, 2021);
- World Bank Group ("WBG") Environmental, Health and Safety ("EHS") Guidelines (General and Sector-specific, as applicable).

The requirements, standards, and guidelines listed above collectively constitute the "Project Standards".

3.1. National Legislation

- Environment Law (No. 2872)
- Regulation on Environmental Impact Assessment
- Regulation on Environmental Auditing
- Regulation on Environmental Permit and License
- Law on the Use of Renewable Energy Resources for Electrical Energy Production (No. 5346)
- Groundwater Law (No. 167)
- Energy Efficiency Law (No. 5627)
- Highway Traffic Law No. 2918
- Highway Transportation Law (No. 5925)
- International Labour Law
- Labour Law (No. 4857)
- Law on Conservation of Cultural and Natural Assets (No. 2863)
- Law on Protection of Cemeteries (No. 3998)
- Law on Protection of Family and Prevention of Violence Against Women (No. 6284)
- Law on the Protection of Personal Data (No. 6698)
- Public Procurement Law (No. 4734)
- Occupational Health and Safety Law (No. 6331)
- Private Security Services Law (No. 5188)
- Public Health Law (No.1593)
- Social Insurance and General Health Insurance Law (No. 5510)
- Trade Unions and Collective Bargaining Law (No. 6356)
- Turkish Code of Obligations (No. 6098)
- Turkish Commercial Law (No.6102)
- Communique on Monitoring and Reporting of Greenhouse Gases ("GHGs")
- Regulation on Air Pollution Caused by Heating
- Regulation on Annual Paid Leave
- Regulation on Assessment and Management of Air Quality
- Regulation on Classification, Labelling and Packaging of Materials and Mixtures
- Regulation on Control of Odor-Generating Emissions
- Regulation on Control of Dust
- Regulation on Control of End-of-Life Tires
- Regulation on Control of Environmental Noise
- Regulation on Control of Excavation Soil, Construction and Demolition Wastes
- Regulation on Control of Industrial Air Pollution
- Regulation on Control of Medical Wastes
- Regulation on Control of Odour-Generating Emissions
- Regulation on Control of Packaging Wastes
- Regulation on Control of Soil Pollution and Lands Contaminated by Point Sources
- Law on Protection of Soil and Land Use (No. 5403)
- Law on Pasture (No. 4342)

- Regulation on Control of Waste Batteries and Accumulators
- Regulation on Control of Waste Electrical and Electronic Goods
- Regulation on Control of Waste Vegetable Oils
- Regulation on Control of End-of-Life Tires
- Regulation on Landfills
- Regulation on the General Principles of Waste Pre-Treatment and Recovery Facilities
- Regulation on Incineration of Wastes
- Regulation on Dust Management
- Regulation on Emergency Situations in Workplaces
- Regulation on Employment Contracts
- Regulation on Equal Treatment and Non-Discrimination
- Regulation on Exhaust Gas Emission Control
- Regulation on First Aid
- Regulation on Health and Safety at Construction Works
- Regulation on Health and Safety Conditions in the Use of Work Equipment
- Regulation on Health and Safety Measures in Working with Chemical Substances
- Regulation on Health and Safety Measures to be taken in Workplace Buildings and Annexes
- Regulation on Health and Safety Precautions for Working with Chemical Substances
- Regulation on Health and Safety Signs
- Regulation on Highway Traffic
- Regulation on Implementation of International Labour Law
- Regulation on Increasing Efficiency in the Use of Energy Resources and Energy
- Regulation on Industrial Air Pollution Control ("RIAPC")
- Regulation on Manual Handling
- Regulation on Machinery Safety
- Regulation on Management of Waste Oils
- Regulation on Monitoring of Greenhouse Gas Emissions
- Regulation on Occupational Health and Safety Committees
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on Occupational Health and Safety in Temporary or Fixed-Term Employment
- Regulation on Occupational Health and Safety Requirements for Temporary or Fixed-Term Employment
- Regulation on Occupational Health and Safety Risk Assessment
- Regulation on Occupational Health and Safety Services
- Regulation on Occupational Hygiene Measurement, Testing and Analysis
- Regulation on Ozone Layer Depleting Materials
- Regulation on Principles and Procedures for Occupational Health and Safety Training of Employees
- Regulation on Protection Against Sabotage
- Regulation on Protection of Buildings from Fire
- Regulation on Protection of Groundwater Against Pollution and Deterioration
- Regulation on Control of Pollution Caused by Hazardous Substances in Water and its Environment
- Regulation on Surface Water Quality

- Regulation on the Protection of Drinking-Utility Water Basins
- Regulation on Flood and Sedimentation Control
- Communique on Water Pollution Control Regulation Sampling and Analysis Methodology
- Communique on Water Pollution Control Regulation Administrative Procedures
- Regulation on Protection of Workers against Hazards of Explosive Environments
- Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals
- Regulation on Risk Assessment
- Regulation on Social Insurance and General Health Insurance
- Regulation on Subcontracting
- Regulation on Substances Depleting the Ozone Layer
- Regulation on Suspension of Work in Workplaces
- Regulation on the Duties, Authorities, Responsibilities and Training of Occupational Safety Specialists
- Regulation on the Duties, Authorities, Responsibilities and Training of Workplace Physicians and Other Health Personnel
- Regulation on the Procedures and Principles of Occupational Health and Safety Training for Employees
- Regulation on the Procedures and Principles of the Employment of Children's and Young Workers
- Regulation on the Reduction in the Sulphur Content of Some Fuel Types
- Regulation on Traffic Signs
- Regulation on Transportation of Hazardous Goods by Road
- Regulation on Use of Personal Protective Equipment at Workplaces
- Regulation on Vocational Training of Employees
- Regulation on Waste Management
- Regulation on Water Intended for Human Consumption
- Regulation on Water Pollution Control
- Regulation on Work Permits for Foreigners Under Temporary Protection
- Regulation on Working Hours
- Regulation on Workplace Harassment
- Regulation on Zero Waste
- Regulation on Environmental Noise Emission Caused by Equipment Used Outdoors
- Type Approval Regulation on Exterior and Exhaust Systems of Motor Vehicles
- Regulation on the Vocational Training of Workers in Hazardous and Very Hazardous Occupations

3.2. International Standards

The EPs are a voluntary framework of environmental and social guidelines adopted by a large number of financial institutions with significant influence in the project finance sector. They consist of ten broad principles, each supported by established environmental and social policies, standards, and guidelines. The relevant principles are listed as follows:

- Principle 2: Environmental and Social Assessment will require the client to conduct an appropriate Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and scale of impacts of the proposed Project.
- Principle 3: Applicable Environmental and Social Standards - The Assessment process should, in the first instance, address compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues.
- Principle 4: Environmental and Social Management System - an Environmental and Social Management Plan ("ESMP") will be prepared by the client to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.

The OECD Common Approaches are guidelines designed to strengthen environmental and social responsibility in the financing of development projects, especially those with potentially significant environmental or social impacts. They provide a framework for conducting thorough environmental and social due diligence in export credits and project financing, focusing on risk management and adherence to international standards. The Common Approaches are widely adopted by member countries of the OECD and aim to ensure that environmental and social issues are consistently integrated into financial decision-making processes. Their scope includes requirements such as environmental impact assessments, stakeholder engagement, and biodiversity protection.

IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts, emphasizes the critical importance of maintaining strong environmental and social performance across all phases of a project. It highlights that an effective ESMS should be a dynamic and ongoing process, driven and supported by management, and built on meaningful engagement with the client's workforce, the local communities directly impacted by the project (the Affected Communities), and, where relevant, other stakeholders.

IFC PS 2 Labor and Working Conditions, underscores that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. For any business, the workforce is a valuable asset, and a sound worker-management relationship is a key ingredient in the sustainability of a company. Failure to establish and foster a sound worker-management relationship can undermine worker commitment and retention and can jeopardize a project. Conversely, through a constructive worker-management relationship, and by treating the workers fairly and providing them with safe and healthy working conditions, clients may create tangible benefits, such as enhancement of the efficiency and productivity of their operations.

IFC Workers' Accommodation: Processes and Standards, ensures that workers' accommodation conditions meet international standards on safety, hygiene, privacy, and well-being.

IFC PS 3 Resource Efficiency and Pollution Prevention, outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies

and practices. In addition, this PS promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

IFC PS 4 Community Health, Safety, and Security, recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this PS addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related activities, with particular attention to vulnerable groups.

IFC PS 8 Cultural Heritage, recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this Performance Standard aims to ensure that clients protect cultural heritage in the course of their project activities. In addition, the requirements of this Performance Standard on a project's use of cultural heritage are based in part on standards set by the Convention on Biological Diversity.

IFC Environmental, Health and Safety ("EHS") Guidelines serve as technical reference documents that provide both general and sector-specific examples of Good International Industry Practice ("GIIP"). These Guidelines outline performance levels and measures that are generally attainable in new facilities through existing technologies at reasonable costs.

The EHS Guidelines for wind energy include information relevant to environmental, health, and safety aspects of onshore and offshore wind energy facilities.

4. OVERLAPS WITH OTHER MANAGEMENT PLANS

This Management Plan is part of the overall suite of Management Plans developed for the Project. It is interconnected with, and partially overlaps, several other Management Plans that address aspects of environmental, social, and health management implications, including:

- Environmental and Social Policy
- Health and Safety Policy
- Human Rights Policy
- Human Resources Policy
- Occupational Health and Safety Management Plan
- Contractor Management Plan
- Offsite Workers' Accommodation Plan
- Security Management Plan

- Training Management Plan
- Supply Chain Management Plan
- Community Health and Safety Management Plan
- Traffic Management Plan
- Air Quality Management Plan including Greenhouse Gas (“GHG”) Reduction Plan
- Noise and Vibration Management Plan
- Soil Management Plan
- Water and Wastewater Management Plan
- Resource Efficiency Management Plan
- Stakeholder Engaegment Plan (“SEP”)
- Labour Management Plan
- Emergency Preparedness and Response Plan
- Hazardous Materials Management Plan (including spill response)
- Environmental Monitoring Plan
- Land Acquisition and Livelihood Restoration Management Plan
- Cultural Heritage Management Plan
- Biodiversity Management Plan
- Habitat Restoration and Rehabilitation Plan
- Invasive Alien Species Management Plan

5. MANAGEMENT MEASURES

Table 2: Environmental and Social Management Measures

Subject	Proposed Mitigation Measures	Implementation Plan
Air Quality Management		
Air Emissions	• Construction sites and transportation routes will be sprayed with water, especially during hot-dry seasons and windy conditions, while dust-generating work will be slowed or halted during strong winds, supplemented by additional water spraying as needed. • Material handling will be minimized, and where dust levels remain problematic, additional control measures such as spraying with water during material handling will be implemented. • Loading and unloading will be carried out without skidding to prevent dust generation. • Material storage height will be kept as minimum as possible. • Slopes in bulk storage areas will be minimized by taking into account the prevailing wind direction. • Stockpiles will be kept for the shortest possible duration and sited considering prevailing wind directions to minimize impacts on sensitive receptors. • Unpaved access roads will be regularly moistened with water to control dust. • Trucks carrying dust-generating materials will be covered with tarp and have their loads sprayed with water to minimize dust. • Construction traffic will avoid passing through settlements whenever possible; if unavoidable, measures such as speed limits will be implemented to minimize emissions, and affected communities will be informed of activities and schedules. • Speed limits will be enforced, and vehicle movements and idling will be minimized. • Overloading of trucks beyond their designated capacity will be prohibited. • Transportation distances will be minimized where feasible.	Air Quality Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	• Vehicle engines and machinery will be operated only when essential to reduce emissions. • Minimum necessary number of equipment/vehicles will be used simultaneously. • The use of fuel-efficient and well-maintained vehicles will be ensured, and regular maintenance will be carried out in accordance with the supplier's recommendations. • Regular checks and maintenance of machinery and equipment will be conducted for providing optimal working conditions and compliance with environmental standards and regulations. • Vehicle exhaust emissions must comply with regulations, with routine maintenance and emission measurements conducted accordingly. • Electric powered equipment mechanization will be used when feasible. • Lighting fires and burning materials will be strictly prohibited. • During the days of extreme wind conditions construction will be suspended temporarily at locations close to sensitive receptors. • Personal protective equipment, such as dust masks, will be provided to workers where excessive dust levels are expected. • In case any air quality related grievance received during the construction and operation phases of the Project, air quality measurement campaign (except from this Plan and to be specific to the locations of the grievance) will be carried out immediately at the area where air quality related grievance is received.	

Subject	Proposed Mitigation Measures	Implementation Plan
GHG Emissions	• The most efficient equipment in terms of fuel usage and effective operation will be chosen. • Maintenance of all machinery and equipment will be periodically conducted to ensure efficient fuel use and effective operation as well. • No idling and out-of-scope operation of the machinery and equipment will be allowed. • Vegetation cover will not be disturbed, except in areas where topsoil removal is required for construction activities. • Efficient resource and material use will be promoted through the development and implementation of a management plans to reduce direct and indirect GHG emissions due to the Project. • To minimize GHG emissions associated with waste disposal, the Project will focus on reducing waste generation during all activities and ensuring that recyclable materials are properly recovered and processed. • All employees will receive climate, resource and energy efficiency awareness training. • Following the construction phase, rehabilitation of land will help to recover lost carbon sink by converting the disturbed land to its original state as much as possible, which will act as a long-term mitigation measure.	
Noise and Vibration Management		
Noise and Vibration Management	• Construction activities and scheduling will be planned with careful consideration of the proximity of the nearest settlements to the Project Area. • In the event that the construction schedule is altered due to unforeseen circumstances (e.g., adverse weather conditions, traffic constraints, or health and safety requirements), all relevant stakeholders will be notified in advance. • Project-related transportation will be routed as far away as possible from identified sensitive receptors.	Noise and Vibration Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	• The operation hours of specific equipment and mobile machinery, particularly those used near residential or community areas, will be restricted to minimize potential disturbances. • Durability of existing access roads will be assessed, and improvement works will be carried out as necessary. Roads will be inspected regularly, and any detected damage resulted from project activities will be repaired promptly to minimize noise and vibration emissions. • Where feasible, noise-generating sources will be relocated to less sensitive areas to benefit from natural distance and barriers. • Machinery and equipment will be subject to routine inspection, maintenance, and repair to ensure noise emissions are kept to a minimum. • Engine exhausts and compressor components will be fitted with appropriate mufflers to reduce noise emissions. • Acoustic enclosures will be installed on noise-emitting equipment casings to contain and minimize sound radiation. • Stationary construction vehicles will not be permitted to keep their engines running. • When replacing equipment, the project will select new machinery with sound power levels equal to or lower than the previous models. • Engine covers of equipment will remain closed during operation to support effective noise control. • All vehicles will undergo regular maintenance to prevent excessive noise that may impact workers or nearby communities. • All transportation activities, including the delivery of turbines, materials, and personnel, will comply with established speed limits. • All turbines will be maintained regularly in accordance with the manufacturer's recommendations. • In case any noise and/or vibration related grievance received during the construction and operation phases of the Project, noise and/or vibration measurement campaign	

Subject	Proposed Mitigation Measures	Implementation Plan
	(except from this Plan and to be specific to the locations of the grievance) will be carried out immediately at the area where noise and/or vibration related grievance is received. • If monitoring results indicate that noise levels are above the defined limits or the increase in the background noise level exceeds the 3 dBA, Yellice Enerji will reduce/limit the number of machineries, vehicles and equipment at the related area, until the noise levels are reduced below the limit values or below the 3 dBA increase.	
Contractor Management		

Before Contractor Selection	• Subcontractor Evaluation:
	  ○ The process will identify potential risks associated with the planned procurement of materials, equipment, services, and labour.
	  ○ It will evaluate the contractor's existing EHS and labour management practices against the Project Standards.
	  ○ The contractor's capacity to deliver the required work and materials/services in compliance with the specified standards will be assessed.
	  ○ Only contractors who can demonstrate full compliance with the selection criteria will be engaged.
	• Yellice Enerji will determine the requirements and the specifications of the Project activities clearly and in detail before announcing the contractor.
	• The requirements and specifications should have a significant impact not only on the cost and level of service, but also on the risks faced by workers, road users, community, etc., and the systems that must be implemented, managed, and adhered to.
	• A Scope of Work should be prepared. A Scope of Work is a form that provides a detailed explanation of work to be performed as part of a contract or subcontract. A scope of work is important because it helps ensure that the parties involved are on the same page regarding expectations related to the project. Tasks are numbered, and there is space for an adequate description of the tasks, the required equipment and services, and who is responsible for the cost of the project.
		Contractor Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan

	• A well-defined Scope of Work should incorporate the following elements:
	  ○ Objectives: A clear statement of the Project's purpose and intended outcomes, articulated in a concise and easily identifiable manner.
	  ○ Deliverables and Milestones: A description of the expected outputs and the associated deadlines or completion dates for each phase of the Project. Deliverables may be structured by phase, timeframe, or final completion date.
	  ○ Variables: Key parameters such as cost, schedule, resources, and required technologies for each stage of the Project. Each variable must clearly specify what is included and excluded.
	  ○ Requirements: All necessary conditions, inputs, and resources needed to support successful Project implementation.
	  ○ Tasks: These include a catalogue of individual action items required to complete each phase of the Project. Tasks should be broken down into a work breakdown structure.
	  ○ Inclusions: All items, activities, and responsibilities explicitly covered within the Scope of Work.
	  ○ Exclusions: Any items or activities that are not included or are specifically excluded from the Scope of Work.
	• Relevant health and safety considerations must be integrated into the Scope of Work. Although they will not be the only factor to be taken into account, they must be included.	

Selection of Contractors	• Project Manager will evaluate contractor applicants to determine their compliance with the requirements and procedures defined in Yellice Enerji's Management System. • The contractor selection process will include a re-evaluation mechanism. If the Project Standards or Scope of Work undergo significant changes, contractors will be reassessed accordingly. • The entire selection process will be documented, and all records will be maintained in accordance with the Personal Data Protection Law.	

Subject	Proposed Mitigation Measures	Implementation Plan

	• The contractor selection procedure will include, at minimum, the following assessments:
	  ○ Review of previous and current clients and projects
	  ○ Evaluation of existing EHS practices
	  ○ Assessment of proposed schedule, labour force, and budget
	  ○ Assessment of workforce capacity for the proposed task
	  ○ Assessment of existing Human Resources policies and practices
	  ○ Capacity of tools, materials, and technology to be used for completion of tasks
	• Licenses, required registrations, the contractor's existing management system, and its performance results will be considered during the preliminary qualification and selection processes. Contractors are required to document their management system and prove their existence along with documentation required to ensure compliance with Project policies and procedures. These include, but are not limited to, the following:
	  ○ Incident statistics
	  ○ Responsibilities and systems defined for the work environment (e.g. procedures and work instructions)
	  ○ Judgment, improvement, and restriction notification records, if any
	  ○ Training and qualification records
	  ○ Inspection and audit records
	  ○ The feedback process for employee complaints and demands
	  ○ Showing a system that is in compliance with all relevant legal requirements
	• Management will not award contracts until the preliminary qualification process is complete.
	• Contractors that fail to demonstrate sufficient levels of competency in the various pre-qualification checklist categories, will be informed of their deficiencies and how to correct them for future consideration.	

Subject	Proposed Mitigation Measures	Implementation Plan

After Contractor Selection	• Once contractors are selected, the executed Work Contract will ensure that the contractor complies with Project Standards through contractual conditions.
	• The Work Contract will contain a clause explicitly stating that the contractor is fully responsible for adhering to the Project ESAP, Yellice Enerji's ESMS, and all applicable Project Standards. These documents will be provided to the contractor.
	• The Work Contract will incorporate, at minimum, the following general requirements:
	  ○ The contractor must maintain an organizational structure with adequate EHS support and resources.
	  ○ The contractor must define the minimum amount of time that management personnel will spend in the field to monitor, supervise, and influence work activities.
	  ○ The contractor must document and communicate responsibilities and accountabilities (including EHS responsibilities and accountabilities) for all personnel and relevant stakeholders.
	  ○ The contractor must establish a system that recognizes, reinforces, and rewards positive behaviours and strong EHS and social performance.
	  ○ The contractor must implement a documented consequence-management approach that ensures a fair and transparent process.
	  ○ The contractor must communicate to its employees that they have the right and ability to stop work or refuse to work in situations where they believe that the work would expose them, other people, or the environment to a risk of harm.
	• All EHS, social, and labour management requirements that the contractors must meet will be clearly stated in the Work Contract (environmental, social, human resources, human rights, grievance mechanism and stakeholder engagement, cultural heritage, scheduling, budget, etc. constraints) with special emphasis on Occupational Health and Safety ("OHS") rules defined by the Project.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• The Work Contract will include provisions allowing work to be halted in cases of repeated violations of Project-defined EHS and OHS requirements. • Penalties to be applied in cases of poor EHS and OHS performance of the contractors evaluated by periodical Yellice Enerji audits, will be annexed to the Work Contract. Accordingly, fines will be applied depending on the incompliance and if no corrective actions are taken by the contractors, Yellice Enerji will have the right to terminate the Work Contract.	
Further Measures	• Yellice Enerji will provide the contractors with all necessary technical support to ensure full compliance with the Project Standards across all activities. • Contractors will be responsible for providing all required documents to Yellice Enerji, if requested. • Contractors will be responsible for assisting their own subcontractors in meeting the Project Standards' requirements, if any. • Contractors will prepare all required plans and procedures in line with national legislation (e.g., emergency response plans, risk assessments) and will also adopt Yellice Enerji's ESMS. • In accordance with the Regulation on Occupational Health and Safety Committees, an official OHS Committee will be established considering the number of contractors, and monthly meetings will be held with contractor participation. • The OHS Specialist will review grievance records to ensure that all grievances are addressed adequately and in a manner satisfactory to Yellice Enerji. • Contractors will support the OHS Specialist in preparing monthly reports and will regularly inform Yellice Enerji about EHS performance, social and labour issues, and proposed mitigation or corrective actions for any identified non-compliance. Yellice Enerji will analyse the contractor's activities and, if necessary, work with each linked contractor to further develop the proposed measures.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• The effectiveness of implemented actions will be reflected in future monthly reports. Where an incompliance requires immediate action, contractors will be responsible for implementing timely and appropriate measures, and to report the results to Yellice Enerji. • The Project's internal grievance mechanism will be accessible to all contractor workers.	
Execution of Works	Some of the tools used to manage contractors during on-site execution of works include, but are not limited to, the following: • All equipment used by contractors will be subject to supervision including OHS and emergency equipment status. Contractors are required to submit documents proving fitness of their equipment such as licenses, legal examination records, mandatory motor insurance, and traffic insurance. • Use of equipment provided by Yellice Enerji will be monitored to ensure that it is utilized solely for its intended purpose. • The properties of all substances that pose significant OHS or EHS risks, including process mid-products, by-products, and waste, must be fully understood, certified, and incorporated into operational procedures. Legally compliant Safety Data Sheets ("SDSs") for these substances (including products) must be available prior to delivery and use. • Hazardous materials approved for use at the site (preferably based on an inventory system) must be recorded. This record will be maintained and used as a reference in order to control purchasing and provision for use of new materials. All hazardous materials brought by contractors must be included in these records or assessed. • Contractors, workers, and Project representatives will conduct routine coordination meetings regarding the transport and use of materials that require coordination among parties at the site, coordinate future works regarding other activities, and review past performance.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Contractors must have a procedure regarding procurement, storage, distribution, and transportation of all equipment and materials that is in accordance with the Project Standard and in proportion with the risk being assessed. • Contractors must have a procedure regarding management of disposal of excess/used materials, chemical substances, hazardous waste, and equipment in a safe and approved manner in accordance with Project Standards. This procedure must define actions aiming at minimizing any type of obligation that may arise in the future.	
Worker's Accommodation		
Off-Site Accommodation	Since no campsite accommodation is planned, non-local workers will be accommodated in rented apartments, staff housing, teacher guesthouses or hotels. These facilities will be required to meet acceptable standards of health, safety, and comfort. Accommodation selection will take into account factors such as proximity to the Project Area, access to essential services, hygiene conditions, fire safety, and security. Regular inspections will be carried out for all off-site accommodation facilities to verify compliance with national regulations and international good practice. As part of this process, Annex I: Checklist on Workers' Accommodation from the "Workers' Accommodation: Processes and Standards" (APPENDIX A - CHECKLIST ON WORKERS' ACCOMMODATION) guidance note by EBRD and IFC will be used as a reference. The checklist covers key elements including: • Location and layout of accommodation • Rooms and sanitary facilities • Health and safety provisions • Canteens and food preparation areas • Waste management and pest control • Security and freedom of movement • Management and grievance systems	Worker's Accommodation Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	The outcomes of these audits will be documented and reported to the Site Chief.	
Rules and Code of Conduct	All workers will be required to follow a code of conduct that promotes respectful behaviour, prohibits any form of harassment or discrimination, and supports a safe and inclusive working environment. This code will be communicated to workers during induction training. In addition, host accommodation facilities will provide basic conduct rules (e.g., quiet hours, cleanliness requirements) consistent with their accommodation policies.	
Security Measures	Although workers will be accommodated off-site, security measures will be implemented both at the accommodation facilities and within the Project Area. Security arrangements for both locations will be managed in accordance with the Project's Security Management Plan. To ensure the safety of workers and nearby communities: • Security conditions at off-site accommodations will be assessed and, where necessary, improved through measures such as locks, lighting, or access control. • Entry to accommodation premises will be monitored where appropriate. • Local mukhtars will be informed about the accommodation locations, where applicable. • A grievance mechanism will be available for security-related or gender-based complaints, ensuring protection against retaliation.	
Health Services	To reduce pressure on local health services, on-site health support will be provided at the Project Area. • The accommodation areas and the Project Area will have at least a first aid kit. • Access to local hospitals will be planned in advance. • Workers will receive health awareness training, including pandemic response, communicable diseases, hygiene, and substance abuse prevention.	
Traffic and Transportation	Traffic safety within both the accommodation areas and the Project Area will be managed in accordance with the Project's Traffic Management Plan. Daily inspections will be	

Subject	Proposed Mitigation Measures	Implementation Plan
	conducted to monitor traffic-related risks such as accidents, dust generation, and vibrations: • Disciplinary measures will be applied in cases of violations. • Speed limits will be enforced within accommodation zones. • All direct and indirect employees will receive training and instructions to comply with traffic rules.	
Kitchens and Social Facilities	For the management of kitchens and social facilities, the following measures will be implemented: • Drinking water will be tested regularly. • Kitchen and laundry areas will be kept clean, well-maintained, and constructed with easy-to-clean materials. • Meals provided will be nutritious and aligned with workers' dietary needs. • Food preparation and dining areas will be smoke-free. • Cooked and raw foods will be stored separately and clearly labelled. • Smoking will not be allowed in indoor shared spaces. • Waste oils will be collected and disposed of appropriately. • Recreational areas and internet access will be provided where feasible.	
Pest Management	To maintain a clean and healthy living environment, regular pest control activities will be carried out in all residential and common areas. Key pest management measures include: • Ensuring that buildings remain free from insects, rodents, and other pests. • Preventing the accumulation of trash in ways that may attract pests. • Routine pest control and disinfection conducted in accordance with national regulations. • Ensuring that pest control activities are performed only by trained and certified professionals. • Prohibiting the use of pesticides near food preparation or serving areas. • Chemicals used will be approved by the OHS Specialist.	

Subject	Proposed Mitigation Measures	Implementation Plan
Grievance Mechanism	A confidential, transparent, and accessible worker grievance mechanism will be implemented throughout the Project lifecycle. The mechanism will be available to all workers including direct employees, contractor personnel, and subcontracted workers allowing them to raise concerns without fear of retaliation. • Workers may submit grievances on a broad range of issues related to working conditions, behaviour, or employment practices. • All grievances will be formally logged, assigned a tracking number, and categorized to support systematic and timely resolution. • Workers will have the option to submit complaints anonymously, and confidentiality will be strictly upheld throughout the process. • Outcomes of general or anonymous grievances will be communicated transparently to the workforce through notice boards, toolbox talks, and internal briefings. • Anonymous reporting options and survivor-centred response protocols will guide all GBVH-related investigations and follow-up actions. • When complainants choose to identify themselves, their identity will only be shared with staff directly involved in resolving the issue. • A gender-sensitive approach will be applied, especially for cases involving Gender-Based Violence and Harassment ("GBVH"). • The mechanism will operate independently of any union processes or legal procedures and will not limit workers' rights to pursue formal legal or institutional remedies. • The system is designed to complement, rather than replace, existing collective bargaining arrangements or legal avenues available to workers.	
Security Management		
Security Risk Assessment	A security risk assessment will be carried out to identify potential risks affecting employees, contractors, suppliers, visitors, and community members. The assessment will also evaluate	Security Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	possible vulnerabilities and threats to Project operations, assets, and equipment. In conducting this assessment, the following factors will be taken into consideration: • Applicable national regulations and relevant international standards • Existing security systems and procedures • Current local socio-political conditions • The surroundings and ongoing activities around the Project Area • Past and current experiences from comparable projects and operations	
Security Organization	A security organization will be established based on the results of the security risk assessment to be conducted by taking into consideration the training standards, procedures for screening employees, and any history of allegations of human rights abuses or other criminal behavior. The following measures will be taken during the establishment of the security organization: ▪ Security services will be provided continuously (24 hours x 7 days a week). ▪ Security Personnel will receive role-specific training and OHS Specialist will be responsible for reviewing and maintaining their training records. ▪ Security Personnel will be assigned to periodically control the security requirements, arrangements, potential threats and the conformity of the existing control measures. ▪ Security Personnel will not have criminal records.	
Employment of Security Personnel and Specific Trainings	• When Security Personnel are contracted from an external company, they must have a formal contract in place. • Each Security Personnel member will be provided with a written document clearly outlining their duties, roles, and responsibilities. • All Security Personnel must possess the legally required security certification whenever possible. If uncertified individuals are assigned security roles (such as badge holders), they must comply with all applicable security regulations, including undergoing necessary training and maintaining a clean criminal record.	

Subject	Proposed Mitigation Measures	Implementation Plan

	• Before commencing work, Security Personnel will receive site induction training, covering project requirements, roles, and responsibilities.
	• Security Personnel will receive specialized training consistent with international standards, covering at minimum the following topics:
	  ○ Ethics and Code of Conduct
	  ○ Effective communication and interaction with community members
	  ○ Voluntary principles applicable to security operations
	  ○ Proper/Not use of force protocols
	• All Security Personnel will be provided with the required safety equipment, communication devices, and Personal Protective Equipment ("PPE"), including:
	  ○ Mobile phones, walkie-talkies, and other communication tools.
	  ○ Protective footwear with steel toe caps and steel soles.
	  ○ Safety helmets, as required for specific tasks.	

Communication and Continuous Monitoring	▪ Regular patrols will be conducted at set intervals whenever a security breach is suspected or observed. ▪ Closed-Circuit Television ("CCTV") will be continuously operational (24 hours x 7 days) and the records will be reviewed periodically on a sampling basis. Any identified threats or suspicious activities will be immediately reported to the Site Chief. ▪ In case of an emergency, Security Personnel will contact the relevant authorities and law enforcement officers.	
Access to the Project Area and Permission	The following measures will be applied during access to the Project Area and all work locations: ▪ Security checkpoint(s) will be established at the entrance(s) of the Project Area with the presence of the Security Personnel. ▪ The entry and exit of equipment and materials will be strictly controlled at security checkpoints, and their movement will only be permitted following confirmation from the appropriate department or authorized personnel.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ The switchyard area will be secured with wire fencing to restrict unauthorized access, and the need for fencing around wind turbines will be assessed and implemented as required. ▪ Considering the size of the Project Area, security cameras will be installed around the Project Area. ▪ Security Personnel will conduct routine patrols throughout the construction site to maintain safety and prevent unauthorized entry. ▪ All personnel entering to the Project Area will be required to carry an ID badge. ▪ Before providing access to the Project Area, for suppliers and visitors, official identity cards will be required by Security Personnel for the registration process and approval of access will also be taken from the related personnel/department. ▪ All vehicle access to the Project Area will be subjected to a vehicle registration procedure. ▪ Security Personnel will coordinate with Site Chief and OHS Specialist to verify that all hazardous materials are checked in upon receipt and that quantities and material descriptions match associated shipping manifests. ▪ Security Personnel will inform the Site Chief and OHS Specialist of delivered materials, who will oversee their unloading or staging.	
Visitors	In addition to the above given measures, following measures will also be applied for visitors: ▪ All visitors entering the Project Area will be recorded in the visitor register at the designated checkpoint(s). ▪ Prior to entry, visitors will receive general OHS training to recognize specific workplace hazards or potential hazards. For short-term visits of a few hours to the work area and/or in cases where people will not be directly exposed to workplace activities, a visitor orientation/promotion form will be given and signed.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ After completing the orientation and receiving the required PPE, visitors will be escorted within the Project Area by trained personnel or Security Personnel. ▪ Photography or video recording within the Project Area will be strictly prohibited unless written approval is obtained from the Site Chief.	
Reporting Security Incidents	All security incidents and all allegations of abusive and unlawful acts of security personnel will be recorded and investigated. These acts will also be reported to public authorities.	
Alcoholic Beverages, Drugs, Guns, and Explosives	▪ Any person under the influence of alcohol or illegal drugs, and any person possessing guns, or any explosives will not be permitted to enter the Project Area. The security personnel will have the right to offer alcohol and drug test to any suspicious person.	
Community Engagement	▪ A grievance mechanism will also be used for communities to express any concerns or complaints related to the acts of security personnel. Information on how to access and use this mechanism will be shared with nearby communities to ensure transparency and ease of communication.	
Training Management		
General Measures	Yellice Enerji will ensure that all employees receive OHS training in full compliance with the *Regulation on Procedures and Principles of Occupational Health and Safety Trainings for Employees*. In this context, the following measures will be implemented: ▪ An annual OHS training program will be developed. ▪ Comprehensive records of all training sessions will be maintained. ▪ Appropriate training will be delivered to workers' representatives. ▪ Employees who cannot provide documentation confirming they have undergone vocational training for their roles will not be assigned to hazardous or highly hazardous tasks that legally require such training.	Training Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Individuals from outside organizations will not be permitted to perform hazardous or high-risk work unless they provide documentation confirming they have received adequate instruction on relevant OHS risks. ▪ Employees who have experienced work-related injuries or illnesses will receive additional training on incident causes, preventive measures, and safe work practices. In addition, any worker who has been absent from the job for more than six months, regardless of the reason, will be required to undergo refresher training before resuming duties. ▪ Employers involved in temporary employment arrangements will be responsible for ensuring that temporary workers receive training on the specific health and safety hazards associated with their tasks. ▪ Training sessions will be repeated at intervals required by applicable legislation. ▪ Under no circumstances will training impose any financial burden on workers. Yellice Enerji will also ensure that all Project employees and managers receive adequate training to support effective implementation of the Environmental and Social Management System ("ESMS") and Environmental and Social Action Plan ("ESAP"), by ensuring that: ▪ Employees understand the importance of implementing the ESMS and ESAP, and recognize that non-compliance may result in significant impacts on the environment, local communities, and Project workers. ▪ Individuals within the organizational hierarchy who hold direct responsibility for the Project's environmental, social, health, and safety outcomes possess the necessary knowledge, skills, and experience to carry out their duties, including up-to-date familiarity with relevant laws, regulations, and standards such as the Project Standards. ▪ Personnel have the expertise, abilities, and experience required to effectively implement the specific measures and actions outlined in the ESMS, as well as the appropriate methods to execute these tasks competently and efficiently.	

Subject	Proposed Mitigation Measures	Implementation Plan
Identification of Training Requirements	Training requirements related to the ESMS and ESAP will be evaluated by the OHS Specialist and the HR Representative, taking into account the following considerations: ▪ All Project personnel and managers must be familiar with the fundamental requirements of the ESMS and ESAP; therefore, they will participate in a training program that provides an overview of the purpose, scope, and key obligations of these systems. ▪ Senior management will be well-informed about the primary processes of the ESMS and ESAP, particularly in relation to auditing and management review procedures; the OHS Specialist and HR Representative are responsible for identifying the training requirements of top management. ▪ The OHS Specialist and HR Representative will maintain the necessary competence and up-to-date knowledge of Turkish EHS legislation, relevant international standards, and GIIPs. ▪ Project employees assigned specific roles under the ESMS documentation (including plans, procedures, monitoring and work instructions) must have the necessary knowledge and skills related to their particular responsibilities; if any gaps in competence are found, they must attend targeted training programs. ▪ All workers will complete OHS training as mandated by applicable Turkish legislation.	
Environmental and Social Trainings	List of the training topics that will serve as the minimum training standards for Project ESMS and ESAP, is given below: ▪ E&S awareness ▪ Ethical conduct and practices (code of conduct, human rights etc.) ▪ Resource efficiency practices ▪ Pollution prevention including air, noise and vibration emissions ▪ Management of wastes and hazardous substances, including spill response ▪ Safety measures related to traffic ▪ Protection of cultural heritage, including handling of chance finds ▪ Preservation of biodiversity	

Subject	Proposed Mitigation Measures	Implementation Plan
OHS Training	Providing OHS training to employees is a fundamental strategy for minimizing workplace hazards and preventing occupational illnesses. The primary sources used to identify training needs for the workforce include: ▪ Outcomes of risk assessments and job hazard analyses, where the requirement for training is identified as a preventive measure against risks or hazards. ▪ Employees performing specific tasks, particularly those involving OHS-critical duties, must receive appropriate training in accordance with Turkish regulations ▪ Information provided in Safety Data Sheets ("SDSs") ▪ Data derived from near-miss reports, incident/accident investigations, and trend analyses. During the recruitment of new personnel, the OHS Specialist will assess the competencies required for each role and determine the corresponding OHS training needs. All individuals will undergo an initial induction focused on the Project. A basic occupational safety training program and specialized courses will be delivered, where necessary, to ensure employees understand the specific risks associated with their particular roles and tasks. Training will be provided to all Project personnel including management, employees, interns, and even occasional visitors who may be exposed to hazardous areas. A list of training topics that constitute the minimum OHS training requirements for the Project Area is provided below: **General OHS Trainings** ▪ OHS orientation training for all employees covering fundamental hazard awareness, site-specific risks, safe work procedures, and emergency response protocols, including fire, evacuation, natural disaster procedures, and any site-specific hazard signage or colour-coding systems ▪ Training for new employees on basic site regulations, personal protective measures, and ways to prevent injuries to themselves and their coworkers ▪ Emergency response training provided to all employees ▪ Training on the correct use of personal protective equipment ("PPE")	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Workplace hygiene training ▪ Health awareness education regarding communicable diseases ▪ A visitor orientation and control system designed to prevent unaccompanied access to hazardous areas ▪ Instructions related to SDSs **Specific OHS Trainings** ▪ Identification and management of hazards and risks specific to work activities ▪ Training on specific workplace hazards such as hand tools, electrical safety, working in hot weather, and welding risks ▪ First aid and rescue training for designated employees ▪ Prevention of accidental releases ▪ Work permit procedures ▪ Entry protocols for confined spaces ▪ Any site-specific hazards or colour coding systems ▪ Inspection and upkeep activities ▪ Safe operation of specialized machinery such as forklifts, including proper loading/unloading techniques and adherence to load limits ▪ Safe lifting and materials handling practices ▪ Safety procedures for scaffolding and ladder use ▪ Handling of chemicals ▪ Handling of hazardous materials, including hazardous waste management ▪ Management of flammable substances ▪ Protection against biological hazards ▪ Use of temporary fall protection equipment, personal fall arrest systems, and safety measures for working at heights	
Planning of Required Trainings	OHS trainings will be repeated whenever changes occur in the work environment or when new risks arise. These trainings will be delivered at legally required intervals and whenever deemed necessary based on operational conditions. For the E&S trainings, following approach will be taken:	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ The OHS Specialist and HR Representative will periodically review and update the training program. ▪ Any modifications to operational processes will be evaluated to identify corresponding training needs. ▪ Training will be revised when new or amended regulations come into effect, based on the assessments of OHS Specialist and HR Representative. ▪ Updates to the training program will also be implemented following the findings of internal and external audits.	
Delivery of Required Trainings	The EHS Manager and HR Representative will notify employees and managers about the scheduled training dates and course objectives well in advance, ensuring attendance is possible and there are no conflicts with other responsibilities. This scheduling will be coordinated with all management. Backup sessions will also be planned for those unable to attend the initial dates. The EHS Manager and HR Representative will be responsible for arranging suitable venues and necessary equipment (such as projectors, boards, etc.) on the scheduled training days. Delivery of the training sessions is managed by the EHS Manager and HR Representative, using either internal staff (e.g., EHS Manager and HR Representative) or external specialized trainers. The EHS Manager and HR Representative will select trainers based on their qualifications. Trainers will be required to provide training materials, including presentations, handouts, and documents. The EHS Manager and HR Representative will maintain records of all training materials. The EHS Manager and HR Representative will also document all completed training courses along with attendees' signed participation forms. Participation forms will be given to trainers before the start of the session and collected by the EHS Manager and HR Representative at the conclusion of the training, along with any supporting materials such as presentations and handouts.	

Subject	Proposed Mitigation Measures	Implementation Plan
Evaluation of Trainings	The trainer, in coordination with the OHS Specialist and HR Representative, determines if a learning verification is necessary and, if so, organizes all arrangements for the planned assessment. Learning verification may be carried out through: ▪ Group discussions ▪ Interviews ▪ Questionnaires featuring open and/or closed questions Additionally, the OHS Specialist and HR Representative may choose to distribute evaluation questionnaires regarding the training and trainer at the conclusion of the course.	
Hazardous Materials Management		
Avoidance of Hazardous Materials	As a general principle, the Project is committed to avoiding the presence and use of hazardous materials that are prohibited or subject to national or international phase-out regulations due to their significant risks to human health and the environment. The substances listed below shall not be procured, stored, or used at the Project Area under any circumstances, unless a justified exception is provided and approval is obtained from the relevant authorities: ▪ Asbestos and materials containing asbestos ▪ Polychlorinated biphenyls (“PCBs”) and polychlorinated terphenyls (“PCTs”) ▪ Ozone Depleting Substances (“ODSs”) ▪ Persistent Organic Pollutants (“POPs”) ▪ Highly toxic substances (classified as T+), unless no viable and less hazardous alternative is available In cases where equipment containing ODS (such as refrigerants) is proposed, its compliance with applicable Turkish legislation must be evaluated and documented prior to approval. **Radioactive Materials** The use of radioactive materials is not anticipated at any stage of the Project. However, if their use becomes necessary under exceptional circumstances, this must be formally reported to and approved by Yellice Enerji and the relevant regulatory authorities.	Hazardous Materials Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	In such situations, the following requirements shall apply: ▪ All radioactive sources must be clearly identified, and comprehensive documentation must be prepared, including technical specifications and potential exposure risks. ▪ Equipment must comply with the safety standards established by the International Atomic Energy Agency ("IAEA") and the Turkish Atomic Energy Authority ("TAEK"). ▪ All required permits and licenses must be obtained from the competent Turkish authorities. ▪ A dedicated risk assessment must be conducted, and safety procedures must be established for the handling, transportation, and storage of radioactive materials. ▪ Specialized training must be provided to all personnel involved in handling or operating radioactive sources.	
Transportation of Hazardous Materials	▪ The transportation of hazardous materials to the Project Area will be conducted in compliance with the Regulation on the Transportation of Hazardous Goods by Road. ▪ Transportation of hazardous materials will be undertaken by the experienced and trained personnel at the appropriate times of day (as much as possible in the daytime). ▪ Vehicles and equipment performing transportation will be marked with warning signs indicating the transportation of hazardous materials and the signs will be suitable for the materials carried. ▪ Vehicle inspection checklists will be completed before transportation begins, and any identified deficiencies will be addressed in advance. ▪ Transportation will be carried out in line with speed limits appropriate to road conditions and the type of vehicle used. ▪ Hazardous materials will be stored in appropriate containers, which will be inspected for any damage or defects prior to loading and transport. ▪ Hazardous materials will be arranged within transport vehicles in accordance with their hazard classifications and the manufacturer's guidelines.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Employees will use the suitable personal protective equipment (“PPEs”) according to the properties of the hazardous material. ▪ At the site entrance, hazardous materials will be checked upon receipt to ensure that the quantities and the types match the approved purchase order. Unapproved materials will not be accepted to enter the site. ▪ During the unloading and/or loading of hazardous materials, any unauthorized persons will not be allowed to enter the area, and the area will be indicated by warning signs that hazardous material is being unloaded or loaded. ▪ Spill response materials will be kept in sufficient quantities to ensure immediate intervention in the event of a spill during transportation or loading activities. ▪ In the event of a spill during transportation and/or loading, the Emergency Preparedness and Response Plan will be activated.	
Storage of Hazardous Materials	▪ All hazardous materials will be stored in designated storage areas equipped with a lean-to roof, concrete flooring, proper drainage for spills and leaks, and secondary containment with a capacity of at least 110% of the largest container or 25% of the total volume of above-ground liquid storage tanks. In this regard, a blind sump will be provided for spill containment, and the floor will be sloped to direct any spilled material toward the sump. ▪ Floors within storage areas will be constructed of non-slip materials that are easy to clean. ▪ Adequate lighting and ventilation will be provided in all storage areas. ▪ Hazardous and chemical materials will be stored and managed in accordance with applicable national legislation and internationally accepted standards. Storage areas will be inspected daily for housekeeping and maintenance purposes. ▪ Storage areas will be kept clean and access will be restricted to authorized personnel only. ▪ Storage areas will remain locked at all times to prevent unauthorized access.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Safety Data Sheets (“SDSs”) for each hazardous material will be obtained before the material arrives on site. ▪ Potential risks associated with storage and use will be identified prior to the arrival of hazardous materials to prevent environmental damage or safety incidents. ▪ SDSs will be replaced with recent versions if the release dates of SDSs are older than five years or a new version is released by manufacturer. ▪ SDSs will be kept close to the storage area for easy access. ▪ Copies of relevant SDSs will be provided to the Operation Manager, Site Chief, and personnel responsible for storage management. ▪ Contractors will also receive copies of relevant SDSs, and these will remain accessible to workers during their shifts. ▪ Materials will be stored according to their hazard classification and in accordance with the manufacturer’s instructions. ▪ Bulk storage and alphabetical storage practices will not be used. ▪ Materials, particularly flammable substances, will be stored away from direct sunlight and heat sources. ▪ All containers will be clearly labelled with key information including the chemical and trade names, concentration, physical state of the material, hazard class such as flammable, corrosive, reactive or toxic, and manufacturer details. ▪ Containers holding flammable or toxic substances will remain closed when not in use and will be kept in their original packaging. ▪ If a hazardous substance is removed from the primary container for use or distribution, the secondary container will be labelled with identical information. ▪ Mixtures will also be labelled and the “manufacturer name” will be specified during the preparation of the material individually or while placing into the container. ▪ Storage containers will be compatible with the materials stored. The storage containers to be used for the storage of the chemical materials will be selected according to the physical/chemical properties and quantities of the chemical material to be stored in the container.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Any damaged or leaking containers will be removed and replaced immediately with suitable, intact ones. ▪ Liquid hazardous materials (e.g. paints, thinners, solvents, lubricants) stored outside designated storage areas will be placed in appropriate containers equipped with drip trays or secondary containment systems. ▪ Maximum allowable storage quantities will be clearly indicated on storage shelves. ▪ Storage shelves will be connected to the wall or floor to provide stability. Additional protective barrier will also be provided on the shelves in order to prevent the falling of the containers. ▪ Appropriate hazard warnings and protective measure signage will be displayed. ▪ Warning and instructional signs will be provided at the entrance of each storage area. ▪ Warning and guidance signs will be provided at the entrance of the storage area. ▪ Absorbents/spill kits will be located near the storage area in cases of any chemical spillage or leakage resulted by an accident. ▪ Emergency equipment, including accessible eye wash stations and cleaning solutions, will be installed in close proximity to storage areas. ▪ Fire extinguishers will be installed in storage areas where inflammable chemicals are stored. ▪ Appropriate PPE will be provided to authorized personnel responsible from the handling of hazardous substances. ▪ The use of matches and smoking etc. near the storage area will be prohibited and “no smoking” signs will be placed wherever there is a hazard from ignitable or reactive material.	
Use of (Handling) Hazardous and Chemical Materials	▪ When working with hazardous/chemical materials in work sites and their extensions, hazards for health and safety, and the environment will be detected for each material/chemical in use, and control measures will be identified. All personnel working with or exposed to hazardous/chemical materials will know the properties, effects, and protection methods of the materials. Necessary information about hazardous/chemical	

Subject	Proposed Mitigation Measures	Implementation Plan
	materials and their harmful effects will be learned from the SDSs. Therefore, SDSs of hazardous/chemical materials will be kept accessible to all employees on work sites. ▪ Only trained and authorized personnel will be permitted to handle or prepare chemical substances. Appropriate PPE will be supplied, and its proper use will be enforced during all hazardous or chemical material handling activities. ▪ The work environment will be routinely monitored to identify any potential chemical leaks or spills at an early stage. ▪ Discharging chemicals into drainage systems will be strictly prohibited. ▪ Food, beverages, and tobacco products will not be stored, transported, or consumed within chemical storage or preparation areas. Employees will wash their hands and face with soap and water before eating, drinking, or smoking during breaks. ▪ All personnel will be informed about the location of the safety showers and first aid equipment. ▪ Chemical vapours must not be inhaled, or contacted with eyes, skin, and clothes. If vapour inhalation occurs, the affected individual will be moved to fresh air immediately, if respiration stops, artificial respiration will be applied (by the first aider) and immediate medical assistance will be requested. ▪ When a safety shower or eye wash station is not available, the body part or organ that has been in contact with chemicals will be washed with plenty of running water for at least 20 minutes, and medical assistance will be requested. ▪ Before starting to use chemical materials, their SDSs will be read, and other safety measures will be learned by the personnel. ▪ Water bottles, food containers, cups and pitchers will not be used as chemical containers. ▪ Disposal of hazardous material waste (expired chemicals, etc.) will be in compliance with the Hazardous Materials Management Plan. ▪ Refuelling operations will be carried out at designated refuelling paved areas using retention tanks or drip trays (of appropriate volume) to collect leaks/spills.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ If refuelling will be carried out directly through tankers, retention tanks or drip trays (of appropriate volume) will be placed below to collect leaks/spills. ▪ Refuelling on active traffic routes will be avoided. ▪ Any hot work activity will be avoided in the proximity of the refuelling or storage area. ▪ Tanker delivery hose must be checked for presence of residual fuel from last fuelling operation. If there is residual fuel, delivery hose will be handled accordingly. ▪ The delivery pipes will be properly connected, and the integrity of all terminal connections will be verified. ▪ Chemical materials will not be stored anywhere except their storage areas.	
Labelling	All hazardous materials present at the Project Area must be clearly labelled in accordance with their chemical characteristics and associated risks, following the principles outlined in the Regulation on Classification, Labelling, and Packaging of Substances and Mixtures (Official Gazette No. 28848, dated 11.12.2013). This regulation mandates the use of standardized hazard pictograms and abbreviations that reflect the nature of the risks. These pictograms are assigned based on the relevant hazard class and category, and are designed to communicate key information regarding physical, health, and environmental hazards. The classification system is structured into three main categories in the related regulation: **(1) Physical Hazards**, including but not limited to explosives, flammable gases and liquids, self-reactive substances, oxidizing agents, and substances that emit flammable gases upon contact with water. **(2) Health Hazards**, covering risks such as acute toxicity, skin and eye irritation, respiratory sensitization, mutagenicity, carcinogenicity, reproductive toxicity, and systemic organ toxicity. **(3) Environmental Hazards**, which address potential impacts such as acute or chronic aquatic toxicity and harm to the ozone layer. In line with Article 19 of the same regulation, all packaging for hazardous substances and mixtures must include comprehensive labelling with the following minimum information: the name, address, and telephone number of the supplier; the net quantity of the substance	

Subject	Proposed Mitigation Measures	Implementation Plan
	or mixture (unless clearly indicated elsewhere on the packaging); the product identifier; applicable hazard pictograms; signal words; hazard statements (H-codes); precautionary statements (P-codes); and any other relevant supplemental information required for safe handling and use.	
Emergency Response and Spill Management	A project-specific Emergency Preparedness and Response Plan ("EPRP") will be prepared to address potential emergency situations, including accidental releases or spillages of hazardous materials. The EPRP will be developed in alignment with applicable national legislation and Good International Industry Practice ("GIIP"). The document will set out clear procedures for the identification, containment, and remediation of chemical or hazardous material spills, and will define roles and responsibilities, communication pathways, and emergency contact arrangements. Where necessary, the EPRP will also establish coordination mechanisms with external emergency services and ensure that essential emergency equipment, such as fire extinguishers, absorbent materials, PPE, and spill response kits, is strategically positioned and readily accessible. Spill response procedures and instructions will be incorporated into the EPRP and communicated to all relevant personnel. Employees will receive practical training on recognising spill events, initiating the EPRP, and safely deploying spill response equipment. Periodic emergency drills simulating hazardous material incidents will be conducted to evaluate the effectiveness of the EPRP and identify opportunities for improvement. The EPRP will be reviewed and updated regularly based on drill outcomes, incident investigations, and any changes in site conditions or hazardous substances used. These measures aim to reduce potential health, safety, and environmental impacts associated with chemical emergencies and ensure a timely and coordinated response in the event of an incident.	
Risk Assessment	A risk assessment will be conducted in line with the Regulation on Risk Assessment of Health and Safety and Regulation on Health and Safety Measures in Working with Chemical Substances to evaluate the potential health and safety impacts of hazardous/chemical materials used at the work sites and their extensions. The following points will be particularly taken into consideration in the risk assessment:	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ The potential health and safety hazards associated with the material, ▪ SDSs obtained from the manufacturer, importer, or supplier, ▪ Type, level and duration of exposure, ▪ The quantity of material, the conditions of use, and frequency of handling, ▪ Occupational exposure limit values and biological limit values of the product, ▪ The effectiveness of existing or planned preventive and protective measures, ▪ Available results from previous health surveillance activities, ▪ Interactions of the materials with each other and together in the works performed using more than one hazardous/chemical material. If additional information is needed for the risk assessment, it will be obtained from suppliers or other relevant references. This information will include, if available, specific risk assessments of the materials found in the applicable legislation, for users. A new activity involving hazardous/chemical materials will only be initiated after taking measures determined by the risk assessment. Employees who are identified to be at risk in terms of health based on the risk assessment are subjected to appropriate health surveillance. If, as a result of the health surveillance, an identifiable disease or adverse health effect is observed in the employee exposed to the hazardous chemical substance in the workplace, or if it is determined that the biological limit value has been exceeded, the employee is informed of the situation and the necessary information and recommendations are given regarding the necessary health surveillance. In this case, the risk assessment is reviewed and renewed if necessary. The recommendations of the occupational physician, occupational safety specialist, other specialists or Ministry of Labour and Social Security officials will be taken into account in taking the necessary measures to prevent or reduce the risk, including removing the employee from his/her job and employing him/her in another job where there is no risk of exposure to hazardous chemicals. If there are other employees exposed to hazardous materials, their health status will be checked, and these employees will be kept under constant health surveillance	

Subject	Proposed Mitigation Measures	Implementation Plan
Supply Chain Management		
Supplier Selection Criteria and Evaluation	Supplier evaluation will be carried out based on clearly defined selection criteria using a standardized supplier checklist, ensuring that all suppliers are assessed in a fair and consistent manner. Prior to entering into any agreement, suppliers will be evaluated against these criteria, taking into account legal compliance, environmental and social performance, health and safety standards, and labour practices. Suppliers are required to: ▪ Comply with applicable national labor legislation and Project standards, ▪ Demonstrate commitment to fair and equitable labour practices, ▪ Ensure the absence of child and forced labor, ▪ Comply with safety regulations and provide appropriate working conditions, ▪ Meet the required quality, timelines, and quantities specified in the contracts, ▪ Cooperate with monitoring and evaluation processes. Suppliers that do not comply with these requirements may be subject to additional corrective measures or removed from the approved supplier list.	Supply Chain Management Plan
Employment Contracts	All employment arrangements within the supply chain must be transparent: ▪ Written contracts must clearly state job roles, compensation, working hours, and duration. ▪ Workers must be given signed copies of their contracts and promptly informed of any modifications. ▪ Fixed-term contracts must specify the task or timeframe and be documented formally. ▪ Permanent roles should be offered as open-ended contracts where possible.	

Subject	Proposed Mitigation Measures	Implementation Plan
Employment Terms and Conditions	To ensure fair treatment and legal compliance across the supply chain: ▪ Suppliers must provide written employment contracts clearly stating the conditions of employment. ▪ All supply chain workers must be informed of their employment terms, including wages, working hours, benefits, leave entitlements, and termination provisions. ▪ Working conditions will be periodically reviewed to ensure full compliance with national labor legislation and international standards, including the ILO conventions ratified by Türkiye. ▪ Safe and healthy working environments will be maintained by Yellice Enerji and its suppliers to ensure that no worker is exposed to unsafe conditions or unfair treatment. ▪ Discrimination based on gender, ethnicity, age, religion, disability, marital status, sexual orientation, political opinion, or any other personal characteristic unrelated to job performance will not be tolerated within the supplier operations. ▪ Suppliers are expected to protect workers from any form of discrimination, retaliation, or intimidation related to their participation in union or representative activities. ▪ Suppliers are required to ensure that HR points of contact or grievance channels are available to address worker concerns.	
Migrant Workforce	Where migrant or non-local workers are engaged by suppliers: ▪ The Project will ensure that all migrant workers possess valid work permits and are duly registered under the national social security system. ▪ Housing or living conditions provided to migrant workers will follow Project standards.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ If needed, the Project will consider offering support such as language help or cultural orientation.	
Child and Forced Labour Prohibition	Child labour and forced labour are strictly forbidden in the Project. The Project is committed to preventing the use of child labour and forced labour in its primary supply chain. Where there is a high risk of such practices, particularly in countries with known prevalence of child or forced labour, these risks will be identified and assessed. If any instances of child labour or forced labour are discovered, prompt and appropriate corrective actions will be implemented to address and remedy the situation. The Project will maintain ongoing monitoring of the primary supply chain to detect any significant changes that may indicate new or emerging risks. In the event of newly identified risks or incidents related to child or forced labour, the Project will take all necessary steps to mitigate the issue, including engagement with the supplier, implementation of a corrective action plan, and, if required, transitioning to alternative suppliers that comply with the Project's labour standards. It will be ensured within the supply chain that: ▪ All forms of forced labour, including work done under pressure, threats, or by holding identity documents, will be banned. ▪ No person under the age of 18 will be employed. ▪ These rules will also apply to contractors and key suppliers. ▪ The Project will check regularly to make sure these standards are being followed.	
Local Procurement	Local procurement from local suppliers and businesses will be promoted to support the local economy, address community expectations, and increase economic opportunities in the	

Subject	Proposed Mitigation Measures	Implementation Plan
	Project-affected settlements, where possible. The Project will generate procurement needs linked to: ▪ The construction activities ▪ The operation activities ▪ The provision of goods, materials, and services required by Yellice Enerji and its contractors Procurement opportunities will include, but not be limited to: ▪ Construction materials and logistics support ▪ Transportation and fuel supply ▪ Basic maintenance and technical services It is expected that while some specialized services may be sourced nationally or internationally, a portion of general and support services can be met by local businesses. To promote local procurement and ensure Project standards within the local suppliers: ▪ Yellice Enerji will make an assessment to understand the capacity and availability of local suppliers and identify potential areas for development or support. ▪ Priority will be given, to the extent feasible, to the selection of local suppliers that meet the quality and compliance requirements of the Project. ▪ Procurement opportunities will be announced through transparent and accessible channels such as the internet, local newspapers, local authorities, chambers of commerce, and trade associations to ensure wide awareness and participation.	
Supplier Performance Evaluation	An independent annual supplier performance evaluation will be carried out to review the performance of all Yellice Enerji suppliers. Based on the results, Yellice Enerji will determine whether to continue collaboration with the current supplier, seek alternatives, or discontinue the relationship and identify a replacement if necessary. The evaluation will consider the following criteria: ▪ Punctual completion of assigned tasks	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Adherence to contractual obligations ▪ Effectiveness of communication ▪ Record of incidents ▪ Compliance with health, safety, and environmental regulations and site-specific rules	
Grievance Mechanism	A confidential, transparent, and easy accessible worker grievance mechanism will be maintained throughout all phases of the Project. The Project worker grievance mechanism will be made available to all workers, including direct employees, contractor workers, and supplier workers, allowing them to raise concerns without fear of retaliation. Grievances may cover any workplace concern, including working conditions, misconduct, or unfair treatment. All complaints will be tracked, investigated confidentially, and resolved in a timely manner. Anonymous submissions will be accepted, and whistleblower protections enforced. This system complements rather than replaces, any collective bargaining arrangements or legal appeals available to workers.	
Water and Wastewater Management		
Water Management	The primary goal of water management is to incorporate all the measures necessary to avoid or minimize the creation of costly contamination, while at the same time create opportunities for efficiencies in the use of resources. The water demand for spraying and domestic use during the construction and operation phases will be met from a private well located in Cumhuriyet Neighbourhood, in line with the protocol dated 01.08.2025, and water quality analyses of the well will be conducted regularly. To date, no issues have been encountered regarding water supply.	Waste/Wastewater Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	Mitigation measures regarding water management are followed during construction phase of the Project. ▪ The Project adheres to safety protocols to prevent leaks of hazardous chemicals/materials and liquids (such as diesel fuel, oil) stored on-site. ▪ Design and construction of areas housing diesel/fuel storage tanks (referred to as hazardous material storage areas) prevent potential soil contamination (using paved areas with ample secondary containment, effective drainage systems, and collection ponds). ▪ Temporary waste storage areas have been built in accordance with the stipulations outlined in the "Regulation on Regular Storage of Wastes," published in the Official Gazette No: 27533, dated 26/03/2010 (Amended: OG-24/06/2022-31876), and the "Regulation on Waste Management," published in the Official Gazette, dated 02/04/2015, No: 29314 (Amended: OG-23/03/2017-30016). ▪ Signings regarding safe fuelling and gasoline handling are hung in construction areas. Refuelling of vehicles or equipment are prohibited within excavated areas. If it's impractical to move heavy equipment to designated fuelling points, a impermeable surface, like a drip-tray, are employed to prevent accidental releases to groundwater aquifers. ▪ Excavated areas are not used for storing hazardous materials, and the handling of such materials adhere to Hazardous Materials Management Plan , aligning with the Environmental, Health, and Safety (“EHS”) Guidelines for Environmental Hazardous Material Management. ▪ Emergency Preparedness and Response Plan has been developed to address spills of hazardous materials, including fuels, that may occur during construction activities by following the EHS Guidelines: General EHS guidelines (IFC, 2007) ▪ If necessary, exposed surfaces and stored materials are covered to minimize sediment erosion into surface waters. ▪ This management plan includes specific measures related to surface water and protection, such as:	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Design and management of spoil and soil storage areas and the opening of construction material stores, aiming to control sediment loss into runoff by minimizing slope length and angle. ▪ Implementation of strategies to prevent rainfall erosion and avoid construction activities during heavy rainfall periods. ▪ Diversion of external 'clean' runoff away from the construction area to prevent the mixing of 'clean' and 'dirty' runoff, thereby reducing the required size of sediment basins. ▪ Routing of all 'dirty' runoff to designated sediment basins. ▪ Installation of barrier fences and/or markings to define the limits of the structure/work area susceptible to damage. ▪ Restriction of soil exposure and minimizing degradation during construction. ▪ Covering and safeguarding degraded fertile ground using soil, vegetation, mulch, or erosion-resistant material. ▪ Collection and proper management of polluted water (if generated by accidental leakages) to prevent its mixing with any water body. ▪ Protection of existing drainage and irrigation channels, sediment barriers, green areas, and protection strips through appropriate measures, such as drains and erosion control pits. ▪ Regular inspection and maintenance of all structures and facilities to ensure proper and efficient operation, particularly after heavy rainfall. Removal of sediment deposits, either by spreading on site (if uncontaminated) or at a properly licensed facility. ▪ Training workers, including subcontractor workers, on spill response and the use of containment and cleanup materials (spill kits). ▪ Training workers on water conservation practices and regularly audit performance.	

Subject	Proposed Mitigation Measures	Implementation Plan
Wastewater Management	▪ In terms of domestic wastewater, generated wastewater will be collected in leak-proof (impermeable) septic tank and then will be disposed to the nearest licensed WWTP as per the agreements/protocols to be executed. ▪ The direct discharge of wastewater to the receiving environments will be strictly forbidden. ▪ Stormwater drainage system will be installed at the substation area, mobilization area, and turbine sites to prevent the risk of flooding. ▪ Vehicle washing activities might lead to generation of industrial wastewater in the Project Area. The generated wastewater will be directed to septic tank which will be collected by vacuum trucks for disposal.	
Resource Efficiency		
Monitoring of Resource Consumption	As part of the Project, resource consumption patterns will be regularly monitored, and actions will be defined to minimize overall usage. The proposed measures include the following: ▪ Energy and electricity consumption will be systematically monitored to identify opportunities for improvement, with measures implemented to enhance efficiency, such as reducing energy distribution losses, optimizing system loads, and improving energy conversion performance. ▪ Material use will be monitored periodically, and mitigation measures will be applied, including minimizing the use of chemicals where feasible. ▪ Water consumption will be regularly monitored, and measures will be taken to decrease usage, such as reducing losses within the water distribution system. ▪ Fuel consumption will be monitored, and appropriate measures will be developed and implemented to reduce fuel consumption.	Resource Efficiency Plan

Subject	Proposed Mitigation Measures	Implementation Plan
Work Instructions	Standard work instructions will be established to improve resource efficiency, which will include, but not be limited to, the following actions: ▪ Regular inspection of vehicles, tools, and equipment to ensure proper condition, ▪ Reporting any equipment malfunctions to management promptly, ▪ Implementation of preventive and periodic maintenance for vehicles (e.g., cleaning oil filters, etc.), ▪ Turning off electronic devices when not in use.	
Energy Efficiency Design and Control Measures	The Project will prioritize the use of energy-efficient equipment whenever feasible. During the procurement process, energy consumption characteristics of the equipment will be a key consideration in equipment selection. When utilizing air conditioning systems, efforts will be made to maximize energy efficiency by implementing the following strategies: ▪ Positioning air intakes and air conditioning units in shaded, cooler areas; ▪ Enhancing insulation of buildings, including proper sealing of vents, windows, and doors; and ▪ Installing timers, thermostats, or control systems based on enthalpy to optimize usage.	
Water Use Efficiency Design and Control Measures	▪ The Project will aim to reduce water consumption for equipment and vehicle cleaning as much as possible by assessing the frequency and necessity of washing with a focus on water conservation. ▪ Dust suppression activities will be performed using the minimum amount of water required to maintain effective dust control.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Routine visual inspections of pipes, tanks, and taps will be conducted to identify potential leaks, and hose valves at the site will be regularly checked to ensure proper operation and prevent unintended water loss.	
Raw Materials	▪ In general, raw materials, mainly construction-related, will be managed carefully to avoid overuse and reduce waste generation. During the planning of construction activities, raw material needs will be accurately estimated to prevent unnecessary consumption. ▪ The use of hazardous materials, including chemicals, will be systematically planned to ensure their reduction and minimization. ▪ Additional information regarding the handling and control of hazardous materials and hazardous waste is presented in the Hazardous Materials Management Plan.	
Soil	▪ The reuse of excavated inert soil on-site will be maximized as much as possible. This material will be considered for various purposes, including use as filling material and as a substitute for externally sourced construction materials like gravel or sand. However, any use of inert soil as a replacement for construction materials will be subject to a thorough assessment of its technical properties to ensure suitability. ▪ Additionally, the reuse of stripped topsoil will be prioritized for the restoration of green areas within the Project Area. The topsoil will be preserved and applied primarily for environmental reinstatement purposes and will not be used as backfill or disposed of as waste.	

Subject	Proposed Mitigation Measures	Implementation Plan
Community Health and Safety Management		
General	The general community health and safety hazards associated with wind power plants, as well as the potential risks linked to the Project's construction and operation phases, are summarized below. ▪ Unauthorized entry into the Project Area (particularly by children), creating risks of falls, injuries, or electrocution. ▪ Increased movement of heavy vehicles, which may heighten the risk of accidents involving community members. ▪ Inadequate use of traffic management measures or personnel to control the movement of workers, machinery, and materials within or entering the Project Area. ▪ Community exposure to dust and vibration generated by construction equipment and heavy vehicle activity. ▪ Community exposure to noise resulting from construction machinery, heavy vehicle traffic, and wind turbine operation. ▪ Growth of disease-carrying vectors (such as rodents or mosquitoes) and increased risk of disease transmission due to improper waste management. ▪ Misconduct or excessive use of force by security personnel. ▪ Community dissatisfaction, mistrust, or misinformation arising from inadequate communication. ▪ Risk of blade or ice throw caused by mechanical failures or ice accumulation on turbine blades during the operational phase. ▪ Potential nuisance or health concerns related to shadow flicker affecting nearby residences during the operation phase.	Community Health and Safety Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
Access to the Project Area and Permission	The following measures will be applied to manage access to the Project Area and work sites. Additional details on mitigating security-related risks can be found in the Security Management Plan. ▪ Security checkpoint(s) will be established at the entrance(s) of the Project Area with the presence of the Security Personnel. ▪ The entry and exit of equipment and materials will be strictly controlled at security checkpoints, and their movement will only be permitted following confirmation from the appropriate department or authorized personnel. ▪ The switchyard area will be secured with wire fencing to restrict unauthorized access, and the need for fencing around wind turbines will be assessed and implemented as required. ▪ Security Personnel will conduct routine patrols throughout the construction site to maintain safety and prevent unauthorized entry. ▪ All personnel entering to the Project Area will be required to carry an ID badge. ▪ Before providing access to the Project Area, for suppliers and visitors, official identity cards will be required by Security Personnel for the registration process and approval of access will also be taken from the related personnel/department. ▪ All vehicle access to the Project Area will be subjected to a vehicle registration procedure. ***Reporting Security Incidents*** ▪ All security incidents, as well as any allegations of misconduct or unlawful actions by security personnel, will be documented and investigated. Such incidents will also be reported to the relevant public authorities. Further information is provided in the Security Management Plan.	

Subject	Proposed Mitigation Measures	Implementation Plan
Traffic Control and Management	▪ In the absence of existing bypass routes, cooperation with local authorities will be initiated to design and construct temporary or permanent bypass roads. ▪ Delivery of equipment will be scheduled considering peak traffic hours, and material transport will be carried out during quieter periods to avoid additional congestion in community areas. ▪ Vehicles will be prohibited from using any roads other than the designated routes. ▪ Pedestrian routes will be separated from heavy-vehicle routes. ▪ The entrance to the construction site will be restricted and entrances will be controlled. ▪ A 30 km/h speed limit will be implemented for construction trucks and vehicles, within the settlements. ▪ Compliance with national highway speed limits will be ensured. ▪ The unnecessary use of horns and sirens will be strictly prohibited. ▪ Truck drivers will receive training to avoid unnecessary horn use. ▪ All vehicle occupants will be required to sit in designated driver or passenger seats. ▪ Seatbelts will be worn in vehicles and machinery when being operated. ▪ Drivers will be ensured to be well rested, medically fit and not under the influence of alcohol or drugs, including those prescription medicines which can cause drowsiness. ▪ Periodic visual checks will be conducted to verify that vehicles are in proper working condition. ▪ Drivers will be required to perform pre-trip inspections of their vehicles prior to driving. ▪ Loose items will not be carried in the passenger cabins of a vehicle. ▪ Engines of heavy machinery and trucks will be switched off when not in use. ▪ Preventive maintenance will be carried out to control air emissions from vehicles. ▪ Equipment generating high noise levels will not be operated simultaneously.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Warning signs will be placed in sensitive locations, such as archaeological sites, residential areas, and no-parking zones, where parking will only be allowed in emergencies. ▪ At the entrances and exits of residential areas, signs such as “Yerleşim Yeri Geçişi” and “Dikkat Çocuk Çıkabilir” will be placed along the routes near schools or other areas where children may be present. ▪ Warning signs regarding heavy vehicle traffic in both directions will be placed at the points where the village road passes close to the sharp curve and the houses. ▪ All warning signs and related accessories will be regularly maintained and replaced when necessary. ▪ Barriers will be placed at the required areas to protect both human and assets. ▪ Adequate lighting will be provided to ensure safe visibility for operators. ▪ The loading and unloading areas will be appropriately designed to prevent/minimize vehicle/pedestrian contact and property damages. ▪ A continuous stakeholder engagement process will be maintained, and the Grievance Mechanism will be effectively used. ▪ Drivers will receive training in line with national legislation and Project requirements for the vehicles they operate (service vehicles, heavy vehicles) and will hold the appropriate licenses. ▪ All drivers will be given regular training on traffic rules and safety. ▪ All traffic-related complaints will be recorded and addressed in accordance with the Stakeholder Engagement Plan. ▪ Information on traffic management and safety will be shared with community members during all public engagement meetings.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ In cases of transporting large components (e.g., turbine blades), residents in settlements located along the transport route will be informed in advance. Details such as the timing and duration of transport activities will be communicated to mukhtars and local representatives (e.g., school principals, imams) and shared widely with the affected communities. Where necessary, flagmen will be assigned in residential areas during the passage of oversized equipment. Information on the transportation, storage, and handling of hazardous materials will be detailed in the Hazardous Materials Management Plan, with a brief summary provided below. ▪ Drivers responsible for transporting solid, liquid, or gaseous fuels will hold the certifications required under relevant regulations ▪ All containers will be clearly labelled, spill kits will be available in all transport vehicles, and refuelling activities will be conducted using drip trays to minimize the risk of leaks or spills. ▪ All containers will be clearly labelled, spill kits will be available in all transport vehicles, and refuelling activities will be conducted using drip trays to minimize the risk of leaks or spills. ▪ The transport, storage, and use of hazardous materials will be carried out by trained and certified personnel, in compliance with applicable legislation, and using appropriate equipment and vehicles within the construction site. ▪ Hazardous waste will be transported separately in accordance with legal requirements.	

Subject	Proposed Mitigation Measures	Implementation Plan
Air Quality	The primary air quality control and management measures are outlined below, with further details available in the Air Quality Management Plan including Greenhouse Gas ("GHG") Reduction Plan. ▪ Construction sites and transport routes will be sprayed with water, particularly during hot, dry seasons and windy conditions, to minimize dust emissions. ▪ Vehicle speeds will be restricted to reduce dust generation. ▪ Materials that generate dust during transport will be kept moist by spraying water over the loads. ▪ Trucks carrying fine materials (such as excavation soil or other fine particles) will be covered with tarpaulins to prevent dust release. ▪ Unpaved access roadswill be regularly moistened with water to control dust. ▪ Construction activities near sensitive receptors will be temporarily halted during periods of extreme wind. ▪ If any air quality-related grievance is raised during the construction or operation phases of the Project, an immediate air quality monitoring campaign will be conducted at the location where the complaint was received.	
Noise and Vibration	The key noise and vibration control and management measures are summarized below. Further details on the measures to mitigate noise and vibration related impacts are provided in the Noise and Vibration Management Plan. ▪ Construction activities and scheduling will be planned with careful consideration of the proximity of the nearest settlements to the Project Area. ▪ In the event that the construction schedule is altered due to unforeseen circumstances (e.g., adverse weather conditions, traffic constraints, or health and safety requirements), all relevant stakeholders will be notified in advance.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Project-related transportation will be routed as far away as possible from identified sensitive receptors. ▪ The operation hours of specific equipment and mobile machinery, particularly those used near residential or community areas, will be restricted to minimize potential disturbances. ▪ Machinery and equipment will be subject to routine inspection, maintenance, and repair to ensure noise emissions are kept to a minimum. ▪ Engine covers of equipment will remain closed during operation to support effective noise control. ▪ All vehicles will undergo regular maintenance to prevent excessive noise that may impact workers or nearby communities. ▪ All transportation activities, including the delivery of turbines, materials, and personnel, will comply with established speed limits. ▪ All turbines will be maintained regularly in accordance with the manufacturer's recommendations. ▪ In case any noise and/or vibration related grievance received during the construction and operation phases of the Project, noise and/or vibration measurement campaign (except from this Plan and to be specific to the locations of the grievance) will be carried out immediately at the area where noise and/or vibration related grievance is received.	
Waste Management	▪ The key waste management measures are summarized below. Further details on the measures to mitigate waste-related impacts are provided in the Waste Management Plan. ▪ Waste will always be stored securely to prevent dispersion and resulting pollution.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Waste bins, particularly those containing food waste, will remain closed to avoid attracting animals and birds. ▪ Waste that might be windblown will be covered and secured. ▪ Wastes that could be waterborne will be sheltered to prevent dispersion. ▪ Domestic waste (both inert and biodegradable domestic wastes) will be collected in designated containers and temporarily stored on-site in accordance with the Regulation on Waste Management and the Regulation on Zero Waste. ▪ Waste storage areas will be routinely inspected to verify that appropriate control measures are in place. ▪ Personnel responsible for waste handling will receive training on correct waste management procedures.	
Visual	Visual impacts associated with wind energy projects typically concern the installed and operational turbines themselves. The location of the site and the level of contrast between the existing environmental conditions and turbine structures play an important role on the level of visual impact. Accordingly, visual impact assessment has been conducted for the Project. Following mitigations were defined in this Report to prevent and/or minimize visual impact from the Project on the landscape: ▪ Wherever possible, uniform and appropriately selected color treatments will be used on all structures and surfaces to minimize visual impact. ▪ Wherever feasible, electrical cabling between turbines and substations shall be installed underground to prevent additional visual disruption and landscape fragmentation	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Lighting used for aviation or safety purposes shall be minimized to regulatory requirements, and synchronized flashing red lights (with low intensity) shall be used instead of continuous illumination, where permissible. ▪ All lighting used for access roads, maintenance areas, and substations shall be shielded, downward-directed, and designed to prevent light spilling into the surrounding environment. ▪ Lighting design should consider dark sky protection principles to reduce light pollution in rural and remote areas. ▪ All areas disturbed during construction (access roads, crane pads, temporary laydown areas) shall be revegetated with native plant species to restore the landscape to its pre-construction character as much as possible. ▪ Effective dust suppression (e.g., water spraying) shall be implemented on access roads and disturbed soils to minimize visual impact from haze and soiling. ▪ Construction materials, equipment, and waste shall be stored in designated areas, screened from public view, and removed promptly to avoid visual nuisance. ▪ Residents of nearby communities shall be informed in advance of visual mitigation measures and construction schedules to manage expectations and minimize perceived intrusion. ▪ Key viewpoints shall be periodically re-evaluated during the operational phase to monitor the effectiveness of visual mitigation measures. ▪ At the end of the Project lifecycle, the site shall be fully restored through the removal of all above-ground infrastructure, revegetation of disturbed areas, and landscape rehabilitation to align with the surrounding environment.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ All site personnel and contractors will receive mandatory training on visual impact mitigation measures during site induction.	
Blade and Ice Throw	In accordance with the findings of the Blade Ice Throw Assessment Report, the following mitigation measures will be implemented. ▪ Regular visual and technical inspections and maintenance of turbine blades and hubs will be conducted. ▪ Wind turbines with independent design certification (e.g., IEC 61400-1) will be selected, and manufacturing quality will be monitored to minimize blade failure risks. ▪ Turbines will be equipped with vibration sensors to detect imbalances and automatically shut down if necessary. ▪ Ice detection systems will be installed to stop turbines or activate blade heating systems when ice is detected. ▪ Appropriate setback distances will be established to protect public safety. ▪ Warning signs and boards will be installed at facility entrances and along access routes to inform local communities about risks (e.g., blade throw, ice throw). ▪ Physical and visual warnings will be provided for site personnel and nearby residents. ▪ Individuals within 500 meters of turbines (e.g., campers, visitors) will be informed about potential risks. ▪ Personal protective equipment (“PPE”) will be provided to personnel approaching turbines, and unnecessary vehicle access will be restricted. ▪ Rotor blades will be regularly maintained, and any damage compromising their integrity will be promptly repaired. ▪ Unauthorized access to turbine areas will be prevented.	

Subject	Proposed Mitigation Measures	Implementation Plan
Shadow Flicker	Although no specific shadow flicker mitigation is required for the other sensitive receptors, the following measures will be implemented to proactively manage any potential shadow flicker concerns: ▪ The grievance mechanism will be utilized to receive, record, and monitor any complaints related to shadow flicker. ▪ In case limit values provided in Project Standards are exceeded at the location where grievance received, mitigation measures (e.g. improving the curtailment conditions at the receptor, limiting the operational hours of the certain turbines for the certain hours at certain dates/seasons) will be decided with grievance holder.	
Emergency Response	The key emergency responses are summarized below. Further details on the emergency response practices are provided in the Emergency Response Plan. ▪ The Emergency Response will consider the nearby settlements and the communication procedures in case of any emergency situation which would impact the community members. ▪ The emergency response teams will be established in line with the regulatory requirements. Regular emergency drills will be carried out in the Project, considering the potential scenarios consisting of impacts and/or communication with the nearby communities.	
Electromagnetic Filed	▪ In case of necessity, warning signage regarding EMF will be installed and unauthorized access to relevant areas will be restricted where necessary. ▪ Potential interference with telecommunication and other sensitive systems will be periodically reviewed. ▪ A grievance mechanism will be maintained to address any community concerns related to EMF exposure.	

Subject	Proposed Mitigation Measures	Implementation Plan
Community Engagement	A grievance mechanism will be used for communities to express any concerns or complaints related to the Project activities. Information on how to access and use this mechanism will be shared with nearby communities to ensure transparency and ease of communication. To prevent and manage possible tensions stemming from the interactions between project workers, including security staff, and local communities: ▪ All project activities will be implemented in accordance with the Human Resources Policy and Security Management Plan. ▪ All personnel, including security staff, will be provided with appropriate training on ethical behavior and community relations. ▪ Both internal and external grievance mechanisms will be actively applied to monitor, record, and address concerns raised by community members.	
Measures for Disease Prevention	To minimize the risk of communicable and occupational diseases among both workers and the surrounding community, a series of preventive strategies will be implemented as part of the health management approach. ***Worker and Community Health Measures*** ▪ Pre-employment medical evaluations and routine health screenings will be carried out, in line with legal requirements. ▪ Training sessions focusing on the prevention of infectious and occupational diseases will be delivered by the Workplace Physician; these may also cover healthy lifestyle practices in line with international good practices (“GIIP”). ▪ A certified Workplace Physician will be designated in accordance with national legislation to oversee health-related programs and conduct awareness-raising efforts. ▪ Public health campaigns led by local authorities may be supported when relevant to the Project.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Daily cleaning of shared facilities (e.g., toilets, sinks, dining halls) will be ensured and monitored regularly by the OHS Specialist. ▪ Water availability for hygiene purposes will be preserved at all times, with future demand increases also considered in planning. ▪ Independent laboratories will periodically test the domestic water used at the Construction Site to ensure compliance with quality standards. ▪ The Project's Grievance Mechanism will be utilized to identify and respond to any community concerns regarding health risks	
Training	Training requirements are detailed in the Training Management Plan and outlined in the sections below. ***Worker Trainings*** All workers will receive, at minimum, the following training sessions to ensure compliance with project standards and promote a safe and responsible working environment: • Mandatory OHS training as per legal requirements • Vocational legal training • Site-specific OHS induction training • First aid training • Emergency response training for designated team members • Technical OHS training (e.g., working at heights, confined spaces) • Waste management practices, including spill response procedures • General environmental awareness • Traffic safety awareness • Cultural heritage awareness, including procedures for archaeological chance finds • Code of ethics and professional conduct ***Visitor Trainings***	

Subject	Proposed Mitigation Measures	Implementation Plan
	All site visitors will be required to attend a brief orientation session before entering the workplace. This visitor training will include, but is not limited to, the following topics: • Overview and objectives of the Project • General site rules and behavioural expectations • Proper use of personal protective equipment (PPE) • Key emergency response protocols • General safety principles and awareness of potential site-specific hazards	
Occupational Health and Safety Management		
Occupational Health and Safety Services	Construction activities are categorized as very hazardous workplaces under Occupational Health and Safety Law (No. 6331). Accordingly, the following provisions will be applied for the appointment of occupational safety specialists (one Class A or B specialist per 250 employees) and workplace physician: ▪ Yellice Enerji will appoint occupational safety specialist, workplace physician, and other health personnel. ▪ The weekly working hours of occupational safety specialists and workplace physicians will be determined in line with the applicable legislations, namely the Regulation on the Duties, Authorities, Responsibilities and Training of Occupational Safety Specialists, and Regulation on the Duties, Authorities, Responsibilities and Training of Workplace Physicians and Other Health Personnel. ▪ If a full-time workplace physician is employed, the appointment of other health personnel will not be mandatory. ▪ Where the determined working hours necessitate full-time employment of both an occupational safety specialist and a workplace physician, the employer will establish an occupational health and safety department that complies with the requirements set out in the Regulation on Occupational Health and Safety Services.	Occupational Health and Safety Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	Operational activities of the Project are likewise categorized as very hazardous under Occupational Health and Safety Law (No. 6331). Therefore, the measures described above will also be applied during the operation phase. In addition, all assigned personnel will perform their roles and responsibilities in accordance with the relevant provisions of national legislation. All contractor and subcontractor employees will undergo a medical examination prior to commencing work on site. As required by law, periodic medical examinations will be carried out on an annual basis. An official Health and Safety Committee will be established in accordance with the Regulation on Occupational Health and Safety Committees, taking into account the number of contractors, and the Committee will conduct monthly meetings. The Committee will consist of the following members: ▪ Employer or employer's representative, ▪ Occupational safety specialist, ▪ Workplace physician, ▪ A person in charge of carrying out human resources, personnel, social affairs or administrative and financial affairs, ▪ Civil defence expert, if any, ▪ Foreman, if any, and ▪ Employee representative, chief representative in case there is more than one employee representative in the workplace. The Project Area will be equipped with medical facilities, including an infirmary, adequate healthcare staff, and a workplace physician, in compliance with the Regulation on the Duties, Authorities, Responsibilities and Training of Workplace Physicians and Other Health Personnel. All health units will be designed and operated in line with national regulatory requirements.	
Risk Management	Potential risks arising from dangerous activities within the Project will be assessed in accordance with Project standards and applicable legal requirements. In line with the IFC	

Subject	Proposed Mitigation Measures	Implementation Plan
	EHS Guidelines for Wind Energy, the main OHS hazards associated with the Project include working at height, lifting operations, and working in remote locations. To ensure, maintain and improve the health and safety for both the working environment and employees, an OHS risk assessment will be conducted. In accordance with the Regulation on Occupational Health and Safety Risk Assessment, the risk assessment will be conducted by a risk assessment team established by Yellice Enerji. In accordance with the Regulation, the risk assessment team will comprise the following members: ▪ Employer or employer's representative, ▪ Occupational safety specialists and workplace physicians who carry out health and safety services in the workplace, ▪ Support staff at the workplace, ▪ Employee representatives at the workplace, and ▪ Employees appointed to represent all workplace units who have adequate knowledge of the tasks performed, as well as existing or potential hazards and associated risks. Each identified hazard associated with the Project will be evaluated individually. For every hazard, the frequency of the risks that may arise from these hazards and who, what, how and in what severity may be harmed by these risks will be assessed. Risks will be managed in accordance with the internationally recognized hierarchy of risk management: ▪ **Elimination:** physically removing the hazard, ▪ **Substitution:** replacing the hazard with an alternative that presents a lower level of risk, ▪ **Engineering controls:** implementing technical measures such as equipment guards, ▪ **Administrative controls:** applying management measures including trainings, procedures, and policies, ▪ **Personal Protective Equipment ("PPE"):** using protective equipments such as ear protectors, eye protectors, seat belts etc.	

Subject	Proposed Mitigation Measures	Implementation Plan
	In line with legal requirements, workplaces classified as very hazardous are obliged to update their risk assessments at least every two months. Yellice Enerji will promote employee participation by encouraging the reporting of observed hazards. Thus, measures can be taken before hazards turn into serious accidents or incidents, and that employee observations are incorporated into ongoing risk assessment processes.	
Management of Emergencies	In accordance with the Regulation on Emergency Situations in Workplaces, Yellice Enerji will assess potential emergency situations, which may affect employees and the working environment, in advance by considering factors such as working environment, materials used, work equipment, and environmental conditions. For the Project, possible emergency scenarios and corresponding response methods will be identified. Insufficient management of emergencies during the construction and operation phases could lead to severe and irreversible impacts on OHS. To mitigate these risks, an Emergency Preparedness and Response Plan will be developed and implemented for the construction and operation phases of the Project. As required by legislation, workplaces classified as very hazardous must update their Emergency Response Plan ("ERP") at least every two years. The primary objectives of the ERP are: ▪ To prevent injuries and fatalities, ▪ To reduce damage to and loss of property, equipment, and the environment, ▪ To establish a clear command structure to enable prompt and coordinated emergency response, ▪ To clearly specify the roles and responsibilities of emergency personnel to avoid confusion and ensure accountability, ▪ To ensure the availability of adequate equipment, personnel, and other resources for effective emergency management, ▪ To minimize interruptions to operations and to ensure rapid return to normal activities following an incident, and ▪ To ensure all personnel are fully aware of their roles and responsibilities during emergencies.	

Subject	Proposed Mitigation Measures	Implementation Plan
	To verify the effectiveness and applicability of the ERP, emergency drills will be conducted at least once a year. Following each drill, corrective and preventive actions will be identified and implemented. These actions will be recorded via corrective preventive action forms. A drill record form will be prepared, documenting the date of the drill, any deficiencies observed, and the corrective actions required. In line with regulatory requirements, an emergency response team comprising extinguishing, rescue, protection, and first aid units will also be established.	
Contractor Management	Contractor engagement is a key component of the Project's EHS management system. Contractor activities will be managed in accordance with the Contractor Management Plan. All contractors operating within the Project area are required to comply with this Plan as well as the applicable EHS procedures relevant to their scope of work. It will be ensured that the procedures prepared by Yellice Enerji will be implemented following approval of contractors will work at the site in accordance with the approved procedures.	
Contractor Selection	Contractor selection for the Project begins with a pre-classification process. Companies that fail to meet the required EHS standards are not allowed to work. The contractor's current OHS performance and past records are reviewed in accordance with the Contractor Management Plan. Project activities are carried out only with contractors who demonstrably have the capacity to perform the work safely, within the specified timeframe, and within the allocated budget.	
Monitoring the Contractors	During the construction phase of the Project, the Subcontractors' OHS Specialist will provide full-time oversight of all activities carried out by contractors. The implementation and monitoring of applicable procedures will be ensured, and reports will be submitted to the OHS Specialist.	
Work Permit System	The work authorization system will be followed, and all necessary work permits will be obtained prior to carrying out high-risk tasks or activities, including but not limited to those listed: ▪ Confined Spaces	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Working at Height ▪ Heavy Lifting ▪ Electrical/Mechanical Works ▪ Excavation Works ▪ Using Hazardous Materials ▪ Pressure Area ▪ Hot Work ▪ Filler Work ▪ Logout/Tagout (“LOTO”) ▪ Scaffolding dismantling and erection ▪ Other High Risks Work shall not commence unless the Work Permit Form is completed and all required work permits are obtained in advance.	
Training	In line with the Regulation on the Procedures and Principles of Occupational Health and Safety Training for Employees, employees are required to receive induction training before commencing work. This training will be designed to protect employees from workplace hazards and risks during the period prior to the completion of basic training and will be given in practice. Each employee will receive a minimum of two hours of induction training. Following the commencement of employment, basic trainings will be completed as soon as possible. In accordance with the Regulation, in workplaces classified as very hazardous, basic trainings must be repeated at least once a year and provided for a minimum duration of 16 hours.	
Occupational Hygiene Measurement	In accordance with the Regulation on Occupational Hygiene Measurement, Testing and Analysis, ensuring a safe working environment requires the identification of the existence, quality and quantity of physical, chemical, and biological hazard sources defined in the risk assessment through environmental and personal exposure measurements, testing, and analyses.	

Subject	Proposed Mitigation Measures	Implementation Plan
	All occupational hygiene measurements, tests, and analyses will be conducted by authorized laboratories holding relevant certificates of competence or pre-qualification. The findings presented in the measurement and analysis reports will first be reviewed for compliance with applicable legal requirements; where no legal limits exist, reference will be made to limit values established by national or international organizations. If any non-compliance is identified, corrective actions will be implemented, the measurements will be repeated, and non-compliance control will be ensured. As part of the Project, industrial hygiene measurements, including but not limited to illumination levels, noise exposure, and thermal comfort, will be carried out.	
Accident/Incident and Occupational Disease Management	All accidents are regarded as preventable, and therefore safety measures are primarily focused on preventing their occurrence. If an accident happens despite these measures, it is unacceptable for a similar incident to occur again due to inadequate investigation or failure to lessons learned. For this reason, the prompt and accurate reporting and investigation of all accidents is essential. Every accident, irrespective of its seriousness, will be thoroughly investigated to avoid recurrence. All accidents and injuries must be reported immediately and verbally to the relevant supervisor, foreman, or chargehand, followed by the completion of a written Accident/Incident Investigation Form. ▪ All fatal injuries, ▪ All injuries requiring first aid treatment, ▪ All damages, ▪ All fires, ▪ All releases or spills of hazardous materials. This form will include the following items to be examined as part of the investigation: ▪ type of incident ▪ type of work being carried out at the time of the incident ▪ any other related activities, e.g. work being carried out by others	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ relevant workplace conditions, e.g. lighting, access etc. ▪ PPE used/specified ▪ materials or substances used ▪ plant/machinery/equipment used ▪ current method statement/procedure ▪ deviation from any method statement/procedure ▪ status of relevant risk assessment ▪ status of training records ▪ relevant trainings held previously The investigation findings should include the following elements: ▪ A summary of all collected evidence, ▪ An evaluation of the adequacy of management and supervisory practices related to the task or activity, ▪ An assessment of the suitability and effectiveness of method statements, procedures, and risk assessments, ▪ An analysis of the probable root cause(s) of the incident, and ▪ Recommendations for corrective and preventive actions to avoid recurrence, such as additional or refresher training, revised or new procedures, or substitution of unsafe practices or materials. The completed investigation form, together with all supporting documents, will be submitted to the Site Chief, with a copy retained by the OHS Specialist. All contractors are required to submit a written accident or incident report to Yellice Enerji within 24 hours of any accidents or incidents that occurred at the Project Area. Any observation of a risk condition or near-miss incident that could potentially result in serious injury, property damage, and/or the environment must be reported immediately to the OHS Specialist. Near-miss report forms will be prepared by the OHS Specialist and will include a description of the identified hazard, the actions taken to address it, and, where appropriate, photographic evidence to support clear understanding.	

Subject	Proposed Mitigation Measures	Implementation Plan
Personal Protective Equipment and Safety Signs	The Regulation on the Use of Personal Protective Equipment at Workplaces states that PPE is used to prevent occupational accidents or occupational diseases, to protect employees from health and safety risks, and to improve health and safety conditions. Required PPE will be determined based on the outcomes of the risk assessment and will be provided to employees free of charge. All PPE will be properly maintained, cleaned, periodically checked, and stored under suitable conditions, and employees will receive appropriate information and training on its correct use. Employees are required to use the provided PPE correctly and ensure its proper care. Yellice Enerji will promote employee participation by seeking their feedback and will ensure that PPE remains continuously available, suitable, and effective. In accordance with the Regulation on Health and Safety Signs, where risks identified through workplace risk assessments cannot be eliminated or sufficiently reduced through collective protective measures or workplace organization methods, health and safety signage will be installed and maintained in suitable locations. According to the Regulation, employees will be trained on the meaning of the signs and on the actions and behaviours required by these signs.	
Machine and Equipment	Machinery and equipment to be used within the Project Area will be selected by taking into account working conditions as well as occupational health and safety risks. All work equipment will comply, at a minimum, with the requirements set out in the Regulation on Health and Safety Conditions for the Use of Work Equipment. Where machinery or equipment to be used cannot be made completely hazard-free for employees' health and safety, appropriate control measures will be implemented to reduce hazards to an acceptable level. Maintenance, repairs will be carried out, while periodic inspections will be carried out in accordance with the Regulation on Health and Safety Conditions for the Use of Work Equipment, either by accredited institutions or by individuals authorized by the Ministry. These inspections will be performed at the legally defined intervals, and all results will be properly recorded and retained for submission to competent authorities upon request. Only	

Subject	Proposed Mitigation Measures	Implementation Plan
	trained and authorized personnel will be allowed to operate specific machinery or equipment. In addition, a machine and equipment inventory will be prepared, including key information such as serial numbers, maintenance dates, periodic inspection dates, required certifications, and other relevant details.	
Personal Protective Equipment and Safety Signs	The Regulation on the Use of Personal Protective Equipment at Workplaces states that PPE is used to prevent occupational accidents or occupational diseases, to protect employees from health and safety risks, and to improve health and safety conditions. Necessary PPE will be determined as a result of the risk assessment and will be provided to employees free of charge. PPEs will be maintained, cleaned, periodically checked and stored in appropriate conditions, and employees will be informed about their use. Employees shall use and maintain the PPE provided correctly. Yellice Enerji will ensure the participation of employees by obtaining their views and will ensure that PPE is always available and effective. According to the Regulation on Health and Safety Signs, based on the results of the risk assessment carried out in the workplace; in cases where the risks in the workplace cannot be eliminated or sufficiently reduced by techniques for collective protection or measures, methods or processes used in the organization of work, health and safety signs must be kept in the workplace and used in appropriate places. As stated in the Regulation, employees will be trained on the meaning of the signs and the behaviours required by these signs.	
Working at Height	▪ Only trained, qualified, and competent personnel will be authorized to perform work at height. ▪ All personnel involved in these activities will be provided with appropriate and task-specific training. ▪ Any lifting equipment used will be inspected and verified prior to the commencement of operations. ▪ Working at height activities will be performed only after obtaining a valid work permit. ▪ Assembly works will be carried out at ground level whenever practicable.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ In the case of adverse weather conditions before or during working at height, the ERP will be applied. ▪ Protective systems, including safety nets and air nets, will be installed and used as required. ▪ All tools and equipment used at height will be properly fixed to prevent falling hazards. ▪ Fall protection measures will be applied to the maximum extent reasonably achievable. ▪ The area beneath the work zone will be restricted and controlled in accordance with relevant standards and regulations.	
Lifting Operations	▪ Personnel assigned to lifting activities will be suitably trained, certified, and competent for the task. ▪ Detailed load information, including weight, size, and configuration, will be communicated in advance. ▪ All lifting operations will be carried out only with a valid work permit in place. ▪ A detailed lifting plan will be developed prior to the operation with the involvement of all relevant parties. ▪ The capacity, resistance, and periodic inspection status of lifting equipment will be thoroughly checked before use. ▪ Lifting operations will be suspended during adverse weather conditions that exceed safe operating limits for the equipment. ▪ A designated lifting supervisor and certified slingers will be present within the work area for the entire duration of the operation. ▪ The area beneath lifting activities will be clearly restricted and controlled in accordance with applicable standards.	
Working in Remote Areas	▪ Employees will not be permitted to work alone in remote locations. ▪ The work location, departure time, and estimated return time of personnel assigned to remote duties will be clearly identified in advance. ▪ Whenever feasible, at least one qualified first aider will be assigned to teams working in remote areas.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ A comprehensive work plan will be prepared beforehand for all activities to be carried out in remote areas. ▪ Suitable communication equipment will be provided to ensure continuous contact with personnel working in isolated locations.	
Manual Handling	▪ All lifting and handling activities will be planned in advance and carried out under appropriate supervision. ▪ Manual handling tasks will be assigned and performed with due regard to the physical capacity and condition of the worker. ▪ Proper manual lifting techniques will be applied, using the legs rather than the back, keeping the back straight, shoulders aligned, and knees correctly bent. ▪ Mechanical or auxiliary handling equipment will be used wherever reasonably practicable. ▪ When transporting items longer than the worker's height, a designated rest point will be identified in the middle of the road to allow changing the transport position. ▪ Manual handling needs will be reduced to the greatest extent possible during the work planning stage. ▪ The work area will be inspected prior to commencing activities, and any obstructions or hazards will be removed.	
Electrical Works	▪ Access to areas where power lines are present will be restricted to authorized personnel only. ▪ Energized power sources will be isolated and shut down before any electrical task begins. ▪ The use of appropriate PPE will be mandatory for all electrical works. ▪ As a preventive measure, all personnel will receive training on electrical hazards and on appropriate actions to take in the event of electric shock. ▪ All electrical activities will be carried out solely by trained and authorized personnel. ▪ The use of damaged, outdated, or worn electrical cables and equipment will be strictly prohibited	

Subject	Proposed Mitigation Measures	Implementation Plan
LockOut/TagOut (“LOTO”) System	▪ The Project’s LOTO Procedure will be implemented to ensure that machinery and equipment are effectively shut down and protected against unexpected start-up during maintenance or repair activities. ▪ LOTO activities will be carried out only by authorized personnel using approved locking and tagging devices. ▪ All energy sources will be clearly identified and isolated prior to the commencement of any maintenance or repair work. ▪ Proper isolation will be verified through testing prior to commencing the task. ▪ A LOTO permit or checklist will be completed before the work is initiated. ▪ Locks and tags will be removed solely by the individual who installed them. ▪ Equipment will be re-energized only after confirming that all tools have been removed and all personnel are safely clear of the area. ▪ Any stored or residual energy will be safely released or adequately secured before work begins.	
Drug and Alcohol Use	▪ The use of alcohol and drugs will be strictly prohibited within the Project Area, including construction sites, operational zones, and all related auxiliary facilities. ▪ All project personnel and visitors will be clearly informed of this prohibition. ▪ Where considered necessary, random drug and alcohol testing may be carried out, particularly in cases of suspicion.	
Pressurized Air Tanks	▪ All compressed air tanks will be kept in safe working condition and will undergo mandatory periodic inspections without exception. ▪ Records will be maintained for every compressed air tank. ▪ Only equipment that complies with Project standards will be used. ▪ Each compressed air tank will be securely anchored or fastened to prevent movement or tipping.	
Construction Vehicle Traffic	▪ All personnel will be provided with traffic safety training. ▪ Visitor briefings will include information on potential risks associated with construction site traffic. ▪ Site speed limits will be clearly defined and strictly enforced at all times.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Heavy construction machinery will be operated only by individuals who are properly trained, certified, and licensed for the specific machinery. ▪ Regular inspections and scheduled maintenance of vehicles and construction machinery will be carried out consistently.	
Visitors	All visitors will be briefed on the Project Area's OHS requirements, including the location of emergency assembly points and relevant contact numbers. Visitors must be accompanied at all times and are allowed to move only within clearly marked and designated safe zones, such as pedestrian walkways. In addition, any service provider, contractor, or worker who will be present on site for more than three days will be required to complete the induction and safety orientation training prior to carrying out any activities.	
Traffic Management		
Access Roads	Regarding access to the Project Area, it is provided from existing village roads that connect to Sivas – Malatya Provincial Road. As part of the Project, some extension and improvement works will be performed on these village roads. Additionally, approximately 20 km long in-site roads (turbine access roads) will be constructed within the scope of the Project.	Traffic Management Plan
Transportation Route	In order to safely transport the wind turbine components (tower, blade, hub and nacelle) to the Project Area, Road Survey Report has been prepared for the Project.	
General Management Controls and Mitigation Measures	▪ In the absence of existing bypass routes, cooperation with local authorities will be initiated to design and construct temporary or permanent bypass roads. ▪ Together with local authorities and community representatives, appropriate traffic management tools (e.g., signage, lighting, right-of-way controls, speed-reduction measures, flagmen) will be developed based on specific locations and times of day. ▪ Delivery of equipment will be scheduled considering peak traffic hours, and material transport will be carried out during quieter periods to avoid additional congestion in community areas. ▪ Vehicles will be prohibited from using any roads other than the designated routes.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Pedestrian routes will be separated from heavy-vehicle routes. ▪ The entrance to the construction site will be restricted and entrances will be controlled. ▪ A 30 km/h speed limit will be implemented for construction trucks and vehicles, within the settlements. ▪ Compliance with national highway speed limits will be ensured. ▪ The unnecessary use of horns and sirens will be strictly prohibited. ▪ Truck drivers will receive training to avoid unnecessary horn use. ▪ All vehicle occupants will be required to sit in designated driver or passenger seats. ▪ Seatbelts will be worn in vehicles and machinery when being operated. ▪ Drivers will always wear appropriate sturdy footwear whilst driving and on duty ("Flip flops" will not be permitted). ▪ Drivers will be prohibited from using mobile phones, including hands-free devices, while driving. It is also strongly recommended for drivers to stop their vehicles in a safe position when receiving or making radio calls. ▪ Drivers will be ensured to be well rested, medically fit and not under the influence of alcohol or drugs, including those prescription medicines which can cause drowsiness. ▪ Drivers will undergo periodic medical examinations. ▪ Limits on trip duration will be applied, and driver schedules will be organized to prevent fatigue. ▪ Periodic visual checks will be conducted to verify that vehicles are in proper working condition. ▪ Drivers will be required to perform pre-trip inspections of their vehicles prior to driving. ▪ Loose items will not be carried in the passenger cabins of a vehicle. ▪ Safety devices such as speed limiters and seatbelts must not be tampered with. ▪ Engines of heavy machinery and trucks will be switched off when not in use. ▪ Preventive maintenance will be carried out to control air emissions from vehicles. ▪ Equipment generating high noise levels will not be operated simultaneously. ▪ Adequate transport vehicle specifications for hazardous material transportation will be ensured, when necessary.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Warning signs will be placed in sensitive locations, such as archaeological sites, residential areas, and no-parking zones, where parking will only be allowed in emergencies. ▪ At the entrances and exits of residential areas, signs such as “Yerleşim Yeri Geçişi” and “Dikkat Çocuk Çıkabilir” will be placed along the routes near schools or other areas where children may be present. ▪ Warning signs regarding heavy vehicle traffic in both directions will be placed at the points where the village road passes close to the sharp curve and the houses. ▪ All warning signs and related accessories will be regularly maintained and replaced when necessary. ▪ Barriers will be placed at the required areas to protect both human and assets. ▪ Adequate lighting will be provided to ensure safe visibility for operators. ▪ In severe weather conditions, the OHS Specialist will evaluate the safety of the roads while taking into account the safety of the operators and will decide whether it is safe for driving or not. ▪ Any road damage caused by Project activities will be repaired through necessary maintenance works. ▪ All roads used for construction and transportation will be regularly maintained, and any damaged sections will be promptly repaired. ▪ The loading and unloading areas will be appropriately designed to prevent/minimize vehicle/pedestrian contact and property damages. ▪ A continuous stakeholder engagement process will be maintained, and the Grievance Mechanism will be effectively used. ▪ Drivers will receive training in line with national legislation and Project requirements for the vehicles they operate (service vehicles, heavy vehicles) and will hold the appropriate licenses. ▪ Insurance for project vehicles and drivers will be ensured to fully cover third party damages.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ All drivers will be given regular training on traffic rules and safety.	
Community Engagement and Grievance	To safeguard the well-being of local communities and ensure a transparent and effective process for addressing concerns, the following community engagement and grievance management measures will be implemented. ▪ Collaboration with local authorities and community members will be carried out to improve road signage, visibility, and overall safety, particularly in areas near schools or other locations where children may be present. ▪ Engagement activities will be conducted with local communities to raise awareness and provide education on traffic rules, pedestrian safety, and potential road hazards. ▪ Traffic safety training will be organized for community members when necessary, especially during periods when heavy-tonnage vehicles will be frequently traveling due to equipment deliveries. ▪ Traffic-related issues and information about the grievance process will be shared with community members during all stakeholder engagement meetings. Continuous engagement with the community to identify and address potential concerns before they escalate, ensuring an open and responsive communication channel between project teams and residents. ▪ All traffic- and transportation-related complaints will be formally recorded and investigated in accordance with the established Grievance Mechanism.	
Air Quality and Noise and Vibration	The following measures have been developed to manage and reduce traffic-related impacts on air quality, noise, and vibration. Additional information can be found in the Air Quality Management Plan and the Noise and Vibration Management Plan. ▪ Water spraying will be applied on access roads and transport routes, especially during hot, dry, or windy conditions. ▪ Dust-generating materials will be kept moist, and water will be sprayed over truck loads to minimize emissions. ▪ Trucks transporting fine materials such as excavation soil or fine aggregates will be covered with tarpaulins to prevent dust emissions.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Unpaved access roads will be regularly wetted to minimize dust generation. ▪ Traffic and transportation activities near sensitive areas will be temporarily suspended during extreme wind events. ▪ Vehicle speed will be limited to reduce dust generation. All transportation activities, including the transport of materials and personnel, will comply with designated speed limits. ▪ The operation of specific equipment and mobile machinery near community areas will be restricted to reduce noise exposure. ▪ Regular maintenance will be conducted to ensure vehicles do not produce excessive noise that may disturb workers or nearby communities. ▪ In the event of noise or vibration complaints related to traffic during construction or operation, site-specific measurement campaigns will be promptly initiated to address the issue. ▪ Project activities will be planned with consideration of their proximity to residential areas to reduce potential disturbances. ▪ Project-related transportation will be routed as far away as possible from identified sensitive receptors. ▪ If the construction schedule changes due to weather, traffic, or health and safety concerns, stakeholders will be informed in advance.	
Specific Trainings	To maintain a high standard of traffic safety, the Site Induction Training will ensure comprehensive education for all employees. The training will include: ▪ Proper entry and exit points to avoid congestion and ensure smooth operations. ▪ Defined speed restrictions to prevent accidents and maintain order on-site. ▪ Strict enforcement of seat belt usage for both front and rear passengers, emphasizing the importance of restraint systems in accident prevention. ▪ Guidelines for minimizing distractions, including prohibiting mobile phone use while driving and ensuring proper vehicle ergonomics.	

Subject	Proposed Mitigation Measures	Implementation Plan
	▪ Instruction on pedestrian zones, designated vehicle movement areas, and emergency response procedures. Furthermore: ▪ Operators of industrial vehicles will be carefully selected, required to hold valid licenses, and provided with specialized training for equipment such as cranes. This training will emphasize safe loading and unloading practices, adherence to load limits, and compliance with industry best-practice standards. ▪ All drivers will participate in ongoing training sessions covering the latest traffic regulations, defensive driving techniques, and emergency response actions.	
Labour Management		
Employment Terms and Conditions	All workers will be informed of their rights and obligations at the time of hiring and whenever there are any changes. The following measures will be implemented for employment terms and conditions of all Project employees: • All workers will be informed of their rights and obligations, including wages, benefits, working hours, overtime, leave entitlements, and contract types. • Employment contracts will be provided in written form and clearly outline terms and conditions, ensuring transparency and understanding. • Working conditions will be regularly monitored to ensure compliance with national labour law and international labour standards, including relevant ILO conventions ratified by Türkiye. • At the end of the construction phase, workers will be informed of contract termination, and applicable severance, transition support, and payments (such as social security and pension contributions) will be provided in a timely manner. • Where necessary, workers will be given the opportunity to seek clarification on their rights and responsibilities through the HR Representative.	Labour Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
	• During the operation phase, any contracted maintenance and security staff will be clearly informed about their contracts and rights.	
Employment Contracts	An employment contract of indefinite duration is established when no specific end date is defined. A fixed-term employment contract is concluded in writing and includes either a predetermined duration or is contingent upon the completion of a specific task or the occurrence of a defined condition. • Employment contracts will clearly define the terms and conditions of employment, including job duties, working hours, remuneration, and contract duration. • Indefinite duration contracts will be used when no specific end date is defined, ensuring ongoing employment security. • Fixed-term contracts will be provided in writing, specifying the duration or the completion of a specific task or condition. • All contracts will clearly state the worker's duties, working hours, remuneration, contract duration (if applicable), and terms of termination. • A signed copy of the contract will be given to each worker for their records, ensuring transparency and mutual understanding. • Workers will be informed of any changes to their employment contracts in a timely manner and in accordance with legal requirements. • Contract renewals and terminations during operation will follow the same standards applied during the construction phase.	
Local Employment	Local employment will be prioritized to maximize socio-economic benefits in the Project-affected area, particularly in Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı Villages. The following enhancement and mitigation measures will be implemented to ensure that the Project prioritizes local employment: • Labour influx will be minimized by prioritizing local employment wherever possible, to avoid social tensions.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Job opportunities will be shared publicly through local communication channels (e.g. mukhtars, notice boards) in accessible formats and languages. • A database of local job applicants will be maintained to track employment, monitor progress, and identify skills gaps. • Where needed, capacity building and on-the-job learning opportunities will be provided to enhance local employability. • Local suppliers and service providers will be prioritized where feasible, to support community development. • Transparent and merit-based recruitment criteria will be applied and shared to prevent perceptions of favouritism or exclusion. • Contractor agreements will include local employment targets. • During the operation phase, local employment will continue to be prioritized for suitable roles whenever possible.	
Working Hours and Compensation	Working hours will be set in accordance with national legislation, with a maximum of 45 hours per week and no more than 11 hours per day. The following measures will be implemented: • Overtime will be voluntary, with compensation provided in line with legal rates. • Overtime will not exceed legal limits, ensuring that workers are not overburdened. • Workers will be informed of their right to refuse overtime without fear of retaliation. Wages, overtime compensation, and benefits will adhere to Turkish Labour Law and applicable collective bargaining agreements. • Workers will receive wages regularly, in full, and documented clearly, with no unlawful deductions. The payment process will be fully transparent, and any potential deductions will be explained in detail.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Compensation will exceed the minimum legal thresholds where possible, aiming for fair wages aligned with IFC best practices for similar projects in the region. • Any benefits provided by the Project, such as bonuses or allowances, will be in line with national legislation and IFC guidelines for worker welfare.	
Workers' Accommodation	A social facility and an administrative building will be established on the Project Area. The daily needs of personnel working during operational hours will be met through these social facilities and the administrative building. Outside of working hours, local personnel will reside in their own homes. For personnel hired from outside the city, accommodation needs will be addressed through renting apartments in a central location near the Project Area or through hotel accommodations. No campsite accommodations are planned for the Project. • For off-site accommodations (such as hotels or rented apartments), the requirements outlined in the Workers' Accommodation: Processes and Standards, IFC and EBRD, Guidance Note will be followed. • All accommodation facilities will meet Turkish regulations and IFC/EBRD guidance on worker camps. The facilities will include adequate space, ventilation, sanitary conditions, and privacy. • Workers' accommodation arrangements will not restrict workers' freedom of movement or of association. • Accommodation conditions will be managed under the Workers' Accommodation Management Plan. The plan will be communicated to contractors as well. • Regular inspections will be conducted by Yellice Enerji representatives at the accommodation sites. • Any accommodation facilities that remain in use during operation will be subject to periodic inspections.	

Subject	Proposed Mitigation Measures	Implementation Plan
Occupational Health and Safety	OHS will be prioritized to protect all workers from hazards associated with construction and operation activities. The following mitigation measures will be implemented to ensure a safe and healthy work environment: • Comprehensive OHS training will be provided to all workers before commencing work and refreshed periodically, with special attention to high-risk tasks. • Appropriate personal PPE will be provided, with strict enforcement of usage on-site. • Routine site inspections and safety audits will be carried out to identify risks and ensure compliance with OHS procedures. • Incident reporting mechanisms will be established, with all incidents, near misses, and unsafe conditions documented, investigated, and addressed. • Workers will have the right to refuse or stop unsafe work without fear of retaliation or disciplinary action. • Access to first aid will be ensured on-site. • All OHS practices will comply with Turkish national regulations and international standards, including relevant ILO conventions and IFC Performance Standards. • Contractors will be monitored regularly for OHS compliance and required to submit periodic reports on health and safety performance. • Periodic refresher training will be provided during the operation phase, especially for high-risk roles like electrical maintenance or confined space entry.	
Night Work	Night work (defined as work between 8:00 p.m. and 6:00 a.m.) will comply with national legislation, and any additional protection will align with IFC standards, including adequate rest periods and proper protective measures, to ensure worker health and safety. • Workers engaged in night shifts will be subject to health assessments, which go beyond national requirements to meet international best practices. • Workers involved in night work will receive health and safety training specific to night shifts.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Special care will be taken for vulnerable groups such as pregnant or nursing workers, who will be excluded from night work unless they voluntarily agree, and the work is found safe. • Additional compensation for night shifts will align with both national legislation and IFC recommendations for fair remuneration for work outside regular hours.	
Child and Forced Labour Prohibition	Child labour and forced labour are strictly forbidden in the Project. • No person under the age of 18 will be employed. • All forms of forced labour, including work done under pressure, threats, or by holding identity documents, will be banned. • These rules will also apply to contractors and, where possible, to key suppliers. • The Project will check regularly to make sure these standards are being followed.	
Migrant Workforce	Where migrant or non-local workers are engaged, equal working conditions, benefits, and protections will apply. • It will be ensured that migrant workers have the necessary work permits and are registered for social security. • If needed, the Project will consider offering support such as language help or cultural orientation. • Housing or living conditions provided to migrant workers will follow Project standards.	
Third-Party Workers and Supply Chain	All third-party contractors will be required to comply with the Project's labour standards. • Contracts with third parties will clearly state these requirements. • The Project will monitor contractor compliance through regular site visits, audits, and interviews with workers. • If a contractor does not follow the rules, they will be asked to take corrective actions. Continued non-compliance may result in termination of their contract.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Primary suppliers will be screened to ensure they do not employ child or forced labour and that they meet basic labour and safety standards. • Where risks are identified, the Project will engage with suppliers to encourage improvement, and where appropriate, develop a corrective action plan. • If serious violations persist and improvement is not achieved within a reasonable period, the Project will shift to alternative suppliers that meet its labour standards. • Long-term contracts will include clauses for periodic re-audits and compliance reporting. • Supply chain monitoring will continue during operation, especially for regular service contracts (e.g., cleaning, catering, equipment maintenance).	
Equal Opportunity and Non-Discrimination	Equal opportunity and non-discrimination will be fundamental principles in all recruitment and employment practices. The following measures will be implemented to ensure fair and inclusive employment practices: • Discrimination based on gender, ethnicity, age, religion, disability, marital status, sexual orientation, political opinion, or any other personal characteristic unrelated to job performance will not be tolerated. • Active steps will be taken to foster an inclusive workplace, including awareness-raising, training for staff and management, and clear communication of equal opportunity policies. • A zero-tolerance approach will be applied to harassment, intimidation, and abuse in the workplace. All workers—including temporary, migrant, and contracted workers—will be protected under these policies. • The Project worker grievance mechanism will be available to all workers for reporting discrimination or harassment, with procedures in place for timely, impartial, and fair resolution.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Recruitment and promotion processes will be transparent, and efforts will be made to encourage applications from underrepresented groups, including women and persons with disabilities.	
Freedom of Association and Collective Bargaining	All Project workers have the right to form and join workers' organizations of their choosing and to bargain collectively. • Workers will be free to form or join worker organizations of their choosing and to engage in collective bargaining. • Workers will be protected from any form of discrimination, retaliation, or intimidation related to their participation in union or representative activities. • The Project will respect workers' rights to organize and will not interfere with the establishment, functioning, or administration of such organizations. • In cases where national law restricts collective bargaining or freedom of association, the Project will allow alternative forms of worker participation and representation to ensure meaningful engagement.	
Workers' Representatives	Workers will have the right to elect representatives to communicate their concerns and interests to management. These representatives will act as a liaison between the workforce and the employer, participating in dialogue on matters such as working conditions, occupational health and safety, and grievance resolution. • In accordance with national regulations and good international practice, at least two workers' representatives will be elected for the anticipated workforce of 100 employees. • The selection process will be free from interference, and representatives will not face retaliation for fulfilling their duties. • Workers' representatives will have access to necessary information and facilities to carry out their duties effectively.	

Subject	Proposed Mitigation Measures	Implementation Plan
	• Training and capacity-building opportunities will be provided, where appropriate, to support their role.	
Grievance Mechanism	A confidential, transparent, and accessible worker grievance mechanism will be implemented throughout the Project lifecycle. The Project worker grievance mechanism will be made available to all workers, including direct employees, contractor workers, and subcontracted workers, allowing them to raise concerns without fear of retaliation. • Grievances may be submitted on a wide range of issues related to working conditions, conduct, or employment practices. • All grievances will be formally recorded, assigned a tracking number, and categorized to enable systematic and timely resolution. • Workers may submit complaints anonymously, and confidentiality will be strictly maintained throughout the resolution process. • In cases where complainants agree to identify themselves, only staff directly responsible for resolving the issue will be informed of their identity. • A gender-sensitive approach will be applied, especially for cases involving GBVH. • Anonymous reporting and survivor-centered response protocols will guide all GBVH-related investigations and follow-up actions. • Outcomes of general or anonymous grievances will be shared transparently with the workforce through notice boards, toolbox talks, and internal briefings. • The mechanism will function independently of any union or legal process and will not affect workers' right to pursue formal legal or institutional remedies. • The system complements—rather than replaces—any collective bargaining arrangements or legal appeals available to workers.	

Subject	Proposed Mitigation Measures	Implementation Plan
Retrenchment	In case of collective dismissals, alternatives will be explored to minimize impacts. If unavoidable, the retrenchment process will include: • Advance notification to affected employees in accordance with legal requirements • Timely payment of all legal entitlements, including severance pay, outstanding wages, and accrued benefits • Completion of all social security and pension contributions • Provision of documented evidence of payments to each affected worker	
Cultural Heritage		
Cultural Heritage	• Report the identified area to the Sivas Museum Directorate; • Undertake all necessary actions in accordance with the instructions provided by the Museum authorities; • Evaluate and implement any necessary design revisions within the scope of the works carried out in this area.	Cultural Heritage Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
Biodiversity Management		
Biodiversity Management	• All Project activities shall remain within approved construction and operational boundaries; • Ecological exclusion areas and environmentally sensitive locations shall be clearly identified and respected; • Vegetation clearance shall be minimised and undertaken only where authorised; • Biodiversity pre-clearance procedures shall be completed before any ground-disturbing activities; • Ecological supervision shall be provided where required by the BMP; • Temporary disturbance areas shall be restored progressively in accordance with the Habit"at Restoration and Compensation Plan (HRCP); • Invasive alien species shall be prevented, monitored, and managed throughout the Project lifecycle; • Pollution prevention measures shall be implemented to protect soil, water, and habitat quality; • Wildlife mortality and disturbance incidents shall be recorded, investigated, and managed through corrective actions; • Biodiversity monitoring programmes shall be implemented in accordance with this BMP; and • Monitoring results shall be reviewed regularly to support adaptive management and continual improvement.	Biodiversity Management Plan

Subject	Proposed Mitigation Measures	Implementation Plan
Habitat Restoration and Rehabilitation	• **Pre-construction:** Confirm restoration units; establish reference plots and baseline monitoring; identify and demarcate priority flora exclusion zones; prepare topsoil management procedures; establish IAS prevention measures; mobilise the Ecological Clerk of Works (ECoW) and restoration specialists. • **Construction:** Progressive topsoil stripping, segregation and storage; implementation of erosion and sediment control measures; landform reinstatement; protection of priority biodiversity features; routine IAS inspections; progressive restoration of completed work areas. • **Post-construction (Progressive Restoration):** Regrade disturbed areas; reinstate salvaged topsoil; prepare restoration surfaces; implement passive natural regeneration and supplementary native seeding where required; undertake initial establishment inspections. • **Operation:** Ecological monitoring; vegetation establishment assessments; IAS monitoring and control; supplementary restoration where required; adaptive management and implementation of corrective actions; verification of restoration success criteria. • **Decommissioning:** Remove redundant infrastructure where applicable; restore temporarily and permanently disturbed areas in accordance with this HRP; verify long-term ecological recovery and achievement of restoration objectives.	Habitat Restoration and Rehabilitation Plan

Subject	Proposed Mitigation Measures	Implementation Plan
Invasive Alien Species Management	Routine monitoring shall: • inspect all high-risk Management Units using standardised survey methods; • document both confirmed IAS occurrences and confirmed absence records; • record observations using standardised field documentation; and • be undertaken by suitably qualified biodiversity personnel. Proposed Monitoring Plan defined in Invasive Alien Species Management Plan will be implemented in the scope of the Project.	Invasive Alien Species Management Plan

6. TRAINING

Once a year, internal and external (when necessary) trainings n will be given by Environmental Engineer or OHS Specialist to all involved parties to ensure that the mitigation measures outlined in this Plan are effectively implemented during the construction and operation phases of the Project.

Trainings will be provided in accordance with the Training Plan.

All training required under this Plan will be provided through induction trainings, which include general, environmental, social, waste management, and ethics topics, as well as job-specific training, where applicable. All personnel involved in the implementation of this Plan will receive training on the relevant components. The Environmental Engineer and OHS Specialist will be responsible for ensuring that equivalent training is also delivered to contractor personnel.

In addition, routine internal inspections will be carried out to confirm that these measures are properly applied.

7. REVIEW AND UPDATE

The Environmental Engineer will report the monitoring results to the relevant parties at the intervals defined in Section **Hata! Başvuru kaynağı bulunamadı.**, ensuring that Project activities remain in line with national legislation and international standards. Based on these results, this Plan will be revised by Environmental Engineer whenever required and the revised Environmental and Social Management Plan will be reviewed and approved by the Site Chief.

The responsibilities, procedures, and compliance actions in this Plan are dynamic, and they will be changed as needed (e.g., after a change in related legislation).

This Management Plan is a living document and will be revised at least once a year, taking into account the following conditions:

- Management review outcomes,
- Changing organisational structure,
- Changing project conditions,
- Internal and external audit results,
- Changes to laws, regulations, and standards,
- New work sites and processes,
- Changing circumstances and commitment to continual improvement,
- Employee opinions/complaints

In the absence of any changes, the Plan will be reviewed on an annual basis to confirm that it remains up to date.

8. REPORTING

The Environmental Engineer will conduct monthly monitoring of the KPIs and submit any identified non-compliances related to environmental, social, and health management to Site Chief through the monthly reports. These reports will also include statistics on KPIs from all plans and procedures within the ESMS.

9. APPENDIX

Appendix-1 Checklist for the Implementation Status of E&S Management Measures

Appendix-1 Checklist for the Implementation Status of E&S Management Measures

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
Air Quality Management						
AQ-1	Air Emissions	Dust suppression measures (e.g., water spraying, stockpile management and road watering) are effectively implemented during construction activities.	Site observation, dust control records	Air Quality Management Plan		
AQ-2	Air Emissions	Dust emissions from material handling and transportation are minimized through appropriate operational controls (e.g., covered trucks, controlled loading/unloading and speed limits).	Site observation, transport procedure	Air Quality Management Plan		
AQ-3	Air Emissions	Vehicles, machinery and construction equipment are regularly maintained and operated in accordance with the manufacturer's recommendations to minimise air emissions.	Maintenance records, equipment inspection records	Air Quality Management Plan		
AQ-4	Air Emissions	Measures are implemented to reduce exhaust emissions and unnecessary fuel consumption (e.g., no excessive idling, appropriate equipment selection and use of electric equipment where feasible).	Site observation, maintenance records	Air Quality Management Plan		
AQ-5	Air Emissions	Air quality complaints are managed through the Project grievance mechanism and corrective actions are implemented where required.	Grievance register, corrective action records	Air Quality Management Plan		
AQ-6	Air Emissions	Air quality monitoring is conducted where required and corrective actions	Air quality monitoring reports, corrective action records	Air Quality Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
		are implemented when monitoring results exceed applicable limits.				
AQ-7	GHG Emissions	Measures to reduce greenhouse gas emissions, including fuel efficiency, resource efficiency and waste minimisation, are implemented.	Fuel consumption records, resource efficiency records, waste records	Air Quality Management Plan		
AQ-8	GHG Emissions	Workforce awareness on climate change, energy efficiency and resource efficiency is provided through training programmes.	Training records	Air Quality Management Plan		
AQ-9	GHG Emissions	Land rehabilitation and revegetation activities are implemented following construction to restore vegetation cover where applicable.	Rehabilitation records, site observation	Air Quality Management Plan		
Noise and Vibration Management						
NV-1	Noise & Vibration	Construction activities are planned and managed to minimise noise and vibration impacts on nearby sensitive receptors.	Construction schedule, site observation	Noise and Vibration Management Plan		
NV-2	Noise & Vibration	Transportation routes and working hours are managed to minimise disturbance to nearby communities.	Traffic Management Plan, transportation records, site observation	Noise and Vibration Management Plan		
NV-3	Noise & Vibration	Construction vehicles, machinery and equipment are regularly maintained and fitted with appropriate noise control measures (e.g., silencers, acoustic enclosures) where required.	Maintenance records, equipment inspection records, site observation	Noise and Vibration Management Plan		
NV-4	Noise & Vibration	Good operational practices are implemented to minimise noise emissions (e.g., avoiding unnecessary	Site observation, equipment specifications	Noise and Vibration Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
		idling, keeping engine covers closed and using lower-noise equipment where practicable).				
NV-5	Noise & Vibration	Noise and vibration complaints are managed through the Project grievance mechanism and appropriate corrective actions are implemented where required.	Grievance register, corrective action records	Noise and Vibration Management Plan		
NV-6	Noise & Vibration	Noise and vibration monitoring is conducted where required and additional mitigation measures are implemented if monitoring results exceed applicable criteria.	Noise and vibration monitoring reports, corrective action records	Noise and Vibration Management Plan		
Contractor Management						
CM-1	Contractor Management	Contractor prequalification and selection procedures are implemented in accordance with the Project requirements.	Prequalification records, contractor evaluation forms	Contractor Management Plan		
CM-2	Contractor Management	Contractors are selected based on technical competence, EHS performance, labour practices and compliance with Project Standards.	Tender evaluation reports, contractor assessment records	Contractor Management Plan		
CM-3	Contractor Management	Contracts include applicable environmental, social, occupational health and safety, labour and Project Standard requirements.	Signed contracts, contract clauses	Contractor Management Plan		
CM-4	Contractor Management	Contractor personnel receive the required site induction and mandatory training before commencing work.	Induction records, training records	Contractor Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
CM-5	Contractor Management	Contractors implement the required management plans, method statements, permits and risk assessments prior to and during the works.	Method statements, permits to work, risk assessments	Contractor Management Plan		
CM-6	Contractor Management	Contractor activities are regularly monitored through inspections, audits and performance reviews, and any non-conformities are addressed through corrective actions.	Inspection reports, audit reports, corrective action records	Contractor Management Plan		
CM-7	Contractor Management	Contractor incidents, near misses, grievances and environmental or social issues are recorded, investigated and closed out appropriately.	Incident reports, grievance records, investigation reports	Contractor Management Plan		
CM-8	Contractor Management	Contractor performance is periodically evaluated and documented, and only contractors meeting Project requirements continue to perform Project activities.	Contractor performance evaluations, review meeting minutes	Contractor Management Plan		
Workers' Accommodation Management						
WA-1	Workers' Accommodation	Workers' accommodation complies with applicable legal requirements and international good practice (e.g., IFC/EBRD Workers' Accommodation Guidelines), where accommodation is provided by the Project.	Accommodation inspection reports, site observation	Workers' Accommodation Management Plan		
WA-2	Workers' Accommodation	Accommodation facilities provide adequate living conditions, including sufficient space, ventilation, lighting,	Site observation, accommodation inspection records	Workers' Accommodation Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
		heating/cooling, sanitation, potable water and housekeeping services.				
WA-3	Workers' Accommodation	Appropriate welfare facilities (e.g., toilets, showers, laundry, kitchen/canteen, recreational areas and medical support where applicable) are available and properly maintained.	Site observation, maintenance records	Workers' Accommodation Management Plan		
WA-4	Workers' Accommodation	Accommodation facilities are managed to ensure workers' health, safety and security, including emergency preparedness, fire safety and access control measures.	Fire safety inspection records, emergency drill records, site observation	Workers' Accommodation Management Plan		
WA-5	Workers' Accommodation	Workers have access to grievance mechanisms and accommodation-related complaints are recorded, investigated and addressed in a timely manner.	Grievance register, worker interviews, corrective action records	Workers' Accommodation Management Plan		
WA-6	Workers' Accommodation	Accommodation facilities are regularly inspected, and any identified non-conformities are corrected through documented corrective actions.	Inspection reports, corrective action records	Workers' Accommodation Management Plan		
Security Management						
SM-1	Security	Security personnel are trained, licensed (where required) and perform their duties in accordance with the Project Security Management Plan and applicable legal requirements.	Security personnel records, training certificates, security procedures	Security Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
SM-2	Security	Access to the Project site is effectively controlled, and appropriate security measures are implemented to protect personnel, assets and the surrounding community.	Site observation, access control records, visitor logs	Security Management Plan		
SM-3	Security	Security incidents and complaints are recorded, investigated and managed through appropriate corrective actions.	Incident reports, grievance records, corrective action records	Security Management Plan		
Training Management						
TR-1	Training	Personnel and contractors receive induction and job-specific training relevant to their roles and Project risks.	Training matrix, induction records, attendance records	Training Management Plan		
TR-2	Training	Refresher training is provided periodically, and training needs are regularly reviewed to ensure competency.	Training schedule, competency assessment records	Training Management Plan		
TR-3	Training	Training records are maintained, and the effectiveness of training programmes is monitored and evaluated.	Training records, evaluation forms, competency assessment results	Training Management Plan		
Management of Hazardous Materials						
HM-1	Hazardous Materials	Hazardous materials are properly labelled, stored, handled and transported in accordance with legal requirements and the Project procedures.	Site observation, SDSs, hazardous material inventory, storage inspection records	Hazardous Materials Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
HM-2	Hazardous Materials	Measures for spill prevention, emergency response and hazardous waste management are effectively implemented.	Spill response equipment, inspection records, spill/incident records, waste manifests	Hazardous Materials Management Plan		
Supply Chain Management						
SC-1	Supply Chain	Suppliers and contractors are evaluated and managed in accordance with the Project's environmental, social, labour and ethical procurement requirements.	Supplier evaluation records, procurement records, contracts	Supply Chain Management Plan		
SC-2	Supply Chain	The Project monitors critical suppliers to ensure continued compliance with Project requirements and applicable legislation.	Supplier audit reports, monitoring records, corrective action records	Supply Chain Management Plan		
Water and Wastewater Management						
WW-1	Water & Wastewater	Water use and wastewater management are implemented in accordance with Project requirements to prevent pollution and promote efficient water use.	Water consumption records, site observation, inspection records	Water & Wastewater Management Plan		
WW-2	Water & Wastewater	Wastewater is properly collected, treated and discharged, and water quality is monitored where required in accordance with legal and Project requirements.	Discharge permits, monitoring reports, maintenance records	Water & Wastewater Management Plan		
Resource Management						
RE-1	Resource Efficiency	Measures are implemented to optimise the use of energy, water and raw materials and to minimise	Resource consumption records, utility records, site observation	Resource Efficiency Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
		resource consumption throughout Project activities.				
RE-2	Resource Efficiency	Resource efficiency performance is monitored, and improvement measures are implemented where opportunities are identified.	Monitoring reports, KPIs, corrective action records	Resource Efficiency Management Plan		
Health& Safety Management						
HS-1	Community Health & Safety	Measures are implemented to protect neighbouring communities from Project-related health and safety risks, including restricted access to hazardous areas and effective communication.	Site observation, fencing/signage inspection records, stakeholder engagement records	Community Health & Safety Management Plan		
HS-2	Community Health & Safety	Community complaints, incidents and emergencies are appropriately managed, investigated and followed up with corrective actions.	Grievance register, incident reports, emergency response records	Community Health & Safety Management Plan		
HS-3	Occupational Health & Safety	Occupational health and safety risks are identified, appropriate control measures are implemented, and work is carried out in accordance with the OHS Management Plan and applicable legal requirements.	Risk assessments, method statements, permits to work, site inspections	Occupational Health & Safety Management Plan		
HS-4	Occupational Health & Safety	Workers are provided with appropriate PPE, required safety training, and emergency arrangements to ensure a safe working environment.	PPE issuance records, training records, site observation, emergency drill records	Occupational Health & Safety Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
Traffic Management						
TM-1	Traffic	Traffic management measures are implemented to ensure the safe movement of Project vehicles and minimise impacts on workers, road users and local communities.	Traffic Management Plan, site observation, vehicle movement records	Traffic Management Plan		
TM-2	Traffic	Drivers are competent, vehicles are roadworthy, and traffic incidents are monitored and managed through corrective actions.	Driver licences, vehicle inspection records, incident reports	Traffic Management Plan		
Waste Management						
WM-1	Waste Management	Waste is segregated, stored, transported and disposed of in accordance with legal requirements and the Project Waste Management Plan.	Waste inspection records, waste transfer notes/manifests, site observation	Waste Management Plan		
WM-2	Waste Management	Waste generation is monitored, and measures are implemented to minimise waste generation and maximise reuse and recycling opportunities.	Waste records, recycling records, monitoring reports	Waste Management Plan		
Biodiversity Management						
BD-1	Biodiversity	Measures are implemented to avoid or minimise impacts on biodiversity, habitats and protected species during Project activities.	Site observation, ecological monitoring reports, inspection records	Biodiversity Management Plan		
BD-2	Biodiversity	Biodiversity monitoring, rehabilitation and corrective actions are implemented in accordance with the Biodiversity Management Plan.	Monitoring reports, rehabilitation records, corrective action records	Biodiversity Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
BD-3	Habitat Restoration & Rehabilitation	Progressive restoration and rehabilitation of disturbed areas are implemented in accordance with the approved restoration programme.	Site observation, restoration records, rehabilitation progress reports	Habitat Restoration and Rehabilitation Plan		
BD-4	Habitat Restoration & Rehabilitation	Ecological monitoring is conducted to verify vegetation establishment and restoration success, and corrective actions are implemented where required.	Monitoring reports, ecological survey records, corrective action records	Habitat Restoration and Rehabilitation Plan		
BD-5	Invasive Alien Species	Measures are implemented to prevent, identify and control invasive alien species throughout the Project lifecycle.	Site observation, inspection records, monitoring reports	Invasive Alien Species Management Plan		
BD-6	Invasive Alien Species	Routine monitoring of invasive alien species is undertaken and appropriate corrective actions are implemented where infestations are identified.	Monitoring records, ecological survey reports, corrective action records	Invasive Alien Species Management Plan		
Cultural Heritage						
CH-1	Cultural Heritage	Procedures are implemented to protect known cultural heritage assets and prevent Project-related impacts.	Site observation, inspection records, Cultural Heritage Management Plan	Cultural Heritage Management Plan		
CH-2	Cultural Heritage	Chance finds are managed in accordance with the Chance Find Procedure, including notification, protection and reporting requirements.	Chance find records, training records, incident reports	Cultural Heritage Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
Stakeholder Engagement						
SE-1	Stakeholder Engagement	Stakeholder engagement activities are implemented in accordance with the Stakeholder Engagement Plan, and relevant stakeholders are informed of Project activities.	Stakeholder engagement records, meeting minutes, communication materials	Stakeholder Engagement Plan		
SE-2	Stakeholder Engagement	Stakeholder grievances are effectively recorded, investigated, responded to and closed out within the established timeframe.	Grievance register, correspondence, corrective action records	Stakeholder Engagement Plan		
Emergency						
EP-1	Emergency Preparedness	Emergency preparedness measures, including emergency response procedures, equipment and trained personnel, are in place and maintained.	Emergency Response Plan, equipment inspection records, training records	Emergency Preparedness and Response Plan		
EP-2	Emergency Preparedness	Emergency drills are conducted periodically, and lessons learned are documented and incorporated into emergency response arrangements.	Drill reports, attendance records, corrective action records	Emergency Preparedness and Response Plan		
Visuality						
VP-1	Visual	Measures are implemented to minimise the visual impact of Project activities through good housekeeping, appropriate site layout and screening where required.	Site observation, inspection records	Visual Management Plan		
VP-2	Visual	Temporary and permanent Project areas are progressively reinstated and	Site observation, rehabilitation records, landscaping records	Visual Management Plan		

No	Subject	Checklist Item	Evidence / Means of Verification	Implementation Plan (Reference)	Implementation Status	Comment
		landscaped, where applicable, to minimise long-term visual impacts.				

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