

AKENERJI Supplemental Action Plan – March 31, 2010

<i>Action</i>	<i>Deadline</i>
1. <u>PS-1 Social and Environmental Assessment and Management Systems</u> 1.1. Incorporate IFC's Performance Standards on Social and Environmental and Social Sustainability and relevant sector guidelines into Akenerji's management system documentation on tracking of legal and other requirements. 1.2. Provide IFC with the environmental and social assessment documentation and clearance certificates by regulatory authorities for the transmission lines and construction of sub-stations for Feke I and Feke II. Conduct environmental and social assessment for Yamanli III transmission lines and sub-stations, in accordance with IFC Performance Standards in addition to local regulatory requirements and submit relevant documentation to IFC. 1.3. Review Akenerji's existing environmental impact assessment procedure to include social, environmental, health and safety (EHS) aspects in line with the IFCs Performance Standards and guidelines both for operational sites and new projects. As a result of this assessment each operational and project site shall contain an Environmental and Social Action Plan which shall define precautions to mitigate environmental and social risks. 1.4. For new projects, commission an independent expert to undertake the social and environmental impact assessment in line with the IFC's Performance Standards in addition to local regulatory requirements. Cumulative impacts and trans-boundary impacts shall be included in the assessment in accordance with IFC PS-1. 1.5. In line with the expansion of the operations, enhance corporate and site staffing and organization of environmental, health and safety management and provide to IFC with revised organization, staffing, job descriptions / responsibilities and training to establish and track corporate social and EHS standards. 1.6. Ensure that Emergency Response procedures are established and regularly tested at each construction site. 1.7. As targeted, achieve third party certification for the corporate environmental, health and safety management systems by accredited institutions in accordance with the international standards.	Within 3 months of commitment Once available Within 3 months of commitment and ongoing. Prior to new projects, post-commitment Within 6 months of commitment Within 3 months of commitment By end 2012
2. <u>PS-2 Labor and Working Conditions (Conditions of Service)</u> 2.1. Revise documented human resources policy, procedures and provide evidence that the labor policy is consistent with national laws and with IFC's Performance Standard 2 requirements. The labor policy will address the recruitment process, freedom of association, grievance mechanism and conditions of employment. It will be communicated and made available in writing to all direct and indirect (contractor) employees upon hiring.	Within 6 months of commitment
3. <u>PS-2 Labor and Working Conditions (Occupational Health and Safety)</u> 3.1. Include in contractor and sub-contractor contracts, sections on OHS as well as working conditions including insurance provisions, minimum work age, maximum permissible working hours, use of rest days, payments and benefits, conditions of labor camp facilities in compliance with national law and internationally agreed standards. 3.2. Ensure that contractors' and subcontractors' OHS procedures include detailed specific sections on work at height, electrical works, tunneling safety, emergency rescue procedures, use of explosives, crane / lifting equipment safety, vehicle safety referencing to local and internationally agreed standards. 3.3. Complete purchasing of adequate gas monitoring systems at all tunneling works. 3.4. Establish internal and external regular inspection mechanisms for all construction sites to ensure that OHS and other rules on working conditions are fully implemented at all times. 3.5. Provide documentary evidence that at each Akenerji site (both operational and under construction), all safety critical equipment (ie. lifting equipment, pressurized vessels, fire safety installations, etc.) are operated by trained / certified operators, documented preventive maintenance programs are in place and regular maintenance being undertaken by accredited bodies. 3.6. Ensure that work permit and lock-out/tag out procedures are established with priority at the new plants prior to start-up and that are effectively implemented at all operational plants. 3.7. Review Personal Protective Equipment (PPE) to ensure that they are correctly selected (eg. Full body harnesses for work at height) and their usage is enforced at operational and project sites. 3.8. Ensure that operational and project sites are reviewed by qualified experts in terms of compliance to national and internationally agreed life and fire safety standards and provide IFC with relevant documentary evidence.	For all new projects Within 3 months of commitment Condition of first disbursement Within 3 months of commitment Within 3 months of commitment Prior to start-up at each plant Confirmation required as a condition of first disbursement 12 months after commitment

4. <u>PS-3 Pollution Prevention and Abatement (Wastes and Effluents Management)</u> 4.1. Complete establishment of documented procedures for wastes and effluents management at all Akenerji plants and project sites. Procedures must include identification of wastes and effluents from each source and means of appropriate disposal. It must be ensured that condense waters and effluents from other technical facilities are included in the procedures, monitoring is performed consistently at each site for all parameters required by local regulations and IFC guidelines and treatment facilities are installed as necessary to ensure compliance for discharge. Sedimentation facilities must be provided at each construction site.	Within 6 months of commitment (document in Annual Monitoring Report)
5. <u>PS-3 Pollution Prevention and Abatement (Hazardous Materials Management)</u> 5.1. Ensure that a hazardous materials inventory is available at each operational and project site with relevant documented instructions of handling, storage and proper disposal. All fuel and other hazardous chemical storage areas are equipped with secondary containment and adequate fire fighting installations. 5.2. Establish a procedure to systematically review prior to purchase, technical specifications of equipments and materials in terms of environmental, health and safety aspects. This will apply to construction, operation and maintenance activities.	Within 3 months of commitment Within 6 months of commitment
6. <u>PS-4 Community, Health, Safety and Security</u> 6.1. Review road safety conditions at the hydropower construction sites on the Goksu River and make arrangements particularly to improve protection measures against rock falls along the roads. 6.2. Undertake awareness-raising exercises in local communities and schools in relation to safety around the new dam sites prior to inundation, so as to reduce the risk of accidental drowning, in collaboration with local leaders. 6.3. Commission an expert to undertake electromagnetic fields surveys at all relevant locations, evaluating potential exposure of the public against reference levels developed by ICNIRP (International Commission on Non-ionizing Radiation Protection). 6.4. Implement recommendations of the planned independent dam safety study.	Condition of first disbursement Prior to water capture Within 12 months of commitment To be discussed once received from third party consultant.
7. <u>PS-5 Land Acquisition and Involuntary Resettlement</u> 7.1. Develop a Land Acquisition and Resettlement Framework including information based on Turkish Laws and IFC Performance Standard 5, for incorporation into the Akenerji management system. 7.2. Prepare Land Acquisition and Resettlement reports for each of the IFC-supported projects based on the Framework mentioned above as well as for future projects.	Condition of first disbursement Condition of first disbursement (IFC projects); positive covenant for future projects
8. <u>PS-6 Biodiversity Conservation and Sustainable Natural Resource Management</u> 8.1. Establish a rehabilitation procedure (management system) which requires contractors to prepare a documented rehabilitation plan for each construction site. 8.2. Commission qualified experts to develop a more detailed understanding of flow regimes, water quality and aquatic ecosystems associated with hydropower project sites on the Goksu River and to establish a regular monitoring schedule to identify and manage any significant adverse cumulative impacts on the Goksu River ecosystem resulting from the development of the hydropower cascade. Collaborate with other key hydropower developers and regulatory agencies in this respect whenever possible.	Within 6 months of commitment Commission study as a condition of first disbursement. Present final report as a condition of subsequent disbursement.
9. <u>PS-7 Cultural Heritage</u> 9.1 Establish a chance find procedure for all construction works to be part of construction (contractor) contracts.	Within 3 months of commitment
10. <u>Community Engagement</u> 10.1. Ensure that an external communication procedure is in place at all plants and project sites under construction, with responsibilities defined for designated personnel at each site to receive and respond to community concerns, and that the contact details are displayed prominently at the facility and project site entrances. 10.2. Expand the community engagement process in the vicinity of all operations via establishment of a formal Community Engagement Procedure and assignment of responsibilities to specific staff / contractors at each site. Community engagement should be an ongoing process and not limited to a once-off EIA consultation meeting.	Condition of first disbursement Condition of subsequent disbursements