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ANKARA ETLİK INTEGRATED HEALTH CAMPUS PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN (DRAFT)

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ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

1. Introduction

This is the Environmental and Social Management and Monitoring Plan (ESMMP) for the 'Etlik Integrated Health Campus Project' (hereinafter 'the Project'). It describes how the Project Company proposes to avoid/minimize potentially adverse impacts, and maximize the potential benefits of the Project identified in the ESIA, as well as to monitor the Project's environmental and social performance. The ESMMP addresses key environmental, health and safety (H&S) and social aspects, and operates within the applicable laws and regulations of Turkey, as well as the policies of international financial organizations such as EBRD.

In accordance with EBRD's Environmental and Social Policy (2008), Category-A Projects require development of Environmental and Social Action Plan (ESAP). The ESAP for the Project is comprised of actions required in the upcoming phases of the Project (e.g. preconstruction, construction and operational phases). These actions prescribed in the ESAP will include activities proposed to address some gaps between the issues that ESIA addressed to date and EBRD Performance Requirements. The ESAP is a comprehensive follow-up document to address and mitigate any environmental and social issues that have been addressed in ESMMP.

2. Responsibilities and Commitments of the Project Company

2.1. Overall Responsibility

Overall responsibility for the ESMMS will lie with the Project Company who will establish and maintain an organizational structure that defines roles, responsibilities, and authority to implement the ESMMS. This will include the designation of in-house personnel during the different phases of the Project.

A number of activities will be carried out by third-parties. All these activities will be undertaken under contract with the Project Company and will be supervised by them to ensure that all contracts include terms and conditions requiring Contractors to adopt management systems which are in line with ISO14001 and with the environmental and social requirements set out in the ESMMP. The Project Company will designate senior managers responsible for management of suppliers and contractors and all suppliers and contractors will be required to demonstrate appropriate skills, qualification and/or working experience.

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1.2.2. Environmental and Social Risk Management Commitment

The Project Company is a Turkish and Italian joint venture and each company is accredited with ISO 9001 and 14001 as well as OHSAS18001. The Project Company will establish the environmental and social management system for this Project to ensure that it aligns with these international quality standards.

A number of commitments are made by the Project Company as part of this ESMMP:

- Commitment to compliance with EBRD Performance Requirements and IFC Performance Standard for the implementation of the Project;
- commitment by Senior Management of the necessary human and financial resources, on an ongoing basis throughout the contract period, to achieve effective and continuous conformance with the ESMMP;
- communication of commitments, roles and related responsibilities to the Project team and external stakeholders via the Project website;
- clearly communicating the ESMMP and associated policies to all Project personnel, contractors and sub-contractors and to external stakeholders;
- ensuring employees and contractors with responsibility for activities relevant to the Project's social and environmental performance have the necessary skills and knowledge to perform the work either through existing skills and experience or by provision of training;
- ensuring the Project is kept up to date with information on relevant Turkish legislation, regulations, standards and guidelines in Turkey and on international best practice;
- ensuring employees and contractors involved with the Project are made aware of the social and environmental aspects of the Project and the specific obligations under the ESMMP by provision of induction and awareness training;
- ensuring employees and contractors receive comprehensive health and safety training at the beginning of an appointment, and thereafter on a regular basis throughout the entire construction period.
- Publication of delegated roles and responsibilities, with regards to contractor management, on the Project Company project website;
- Training records;

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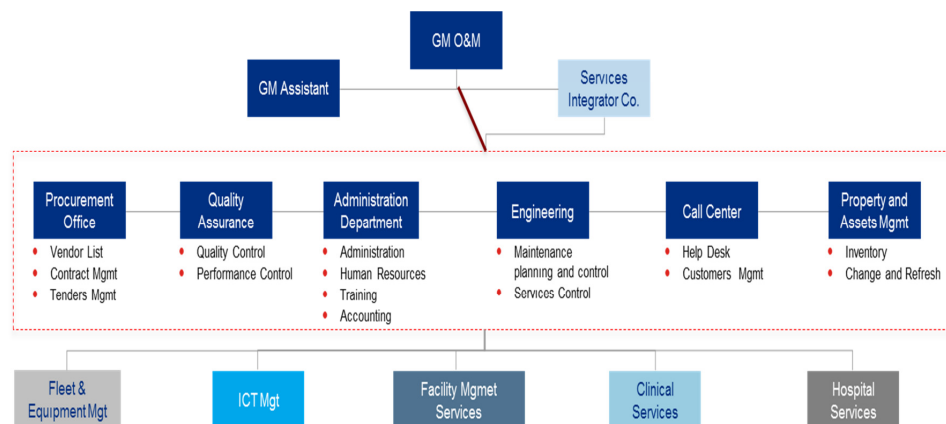
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1.2.3. Operational Stage Dual Management

In the operational phase, there will be a dual management system for the health campus, in which the MoH will be responsible for assigning and managing clinical staff, while the Facility Management Company (FMC), a subsidiary of the Project Company, will be responsible for support services. The health campus manager will be assigned by the MoH. At the time of preparing the ESMMP, the MoH and FMO's dual management arrangements had not been confirmed.

The Project Company is planning to establish an Operations and Management Company for the coordination and provision of the support services, as per the Project Agreement and associated Schedules. In addition, experienced sub-contractors will be contracted to provide those services. Details around the management of human resources and, occupational health and safety during operation are still to be confirmed. Consolidated management systems for the hospital complex to adhere to good international practices such as Joint Commission International (JCI) need to be discussed and agreed among the concerned party.

The following diagram illustrates the expected structure of the Operations and Management Company.



3. Project Environmental and Social Management System

1.13.1 Introduction

The Project Company will establish a Project Environmental and Social Management System (ESMS) for Etlik IHCP guided by this ESMMP. This system will have an environmental and social policy for the Project, contain clear management programs, along with processes for monitoring and review. The ESMS will be coordinated by a Director assigned by the Facility Management Company (FMC). In addition, each

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sub-contractor will have their own Environmental and Social (ES) Manager. The ES Director of the FMC will prepare general guidelines for implementation of the ESMS in compliance with this ESMMP. The ES manager of each sub-contractor will prepare their own plans specific to their activities, and submit them to ES Director for approval. The ES Director will act as a coordinator for all ES managers within the health campus.

1.3.2. Environmental, Health, and Safety (EHS) Plan

The Project Company (SPV) together with its EPC contractors will prepare a detailed Environmental, Health, and Safety (EHS) Plan, under the framework of the ESMS. EHS Plans will be developed for both the construction and operational phases of the Project. The HSE Plan will comply with national laws, standards and contract for the Project. The plan will apply to all Project employees sub-contractors, visitors and other third parties.

The EPC Contractor's EHS Plan for the construction phase will include the following components:

- EHS scope;
- EHS policy;
- EHS organization chart;
- Safety regulations;
- Security responsibilities (site entry procedure, restrictions, exit procedures);
- Accident and incident response and reporting;
- Site layout plan with muster points;
- Material handling and storage;
- Storage of hazardous waste;
- Plan for training and toolbox talks;
- PPE;
- Fire prevention measures;
- Fall protection;
- Emergency preparedness and response planning;
- Vehicle use and maintenance plan; and
- Archaeological chance-find procedure.

During the operational phase, the SPV, in coordination with the MoH, will set up a new EHS management program for the operational phase of the Project. The EHS management program for operation will include:

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- procedures for the management of relevant occupational hazards including medical waste management (see Annex A for an outline plan);
- manual handling;
- falls, trips and slips prevention;
- electrical safety;
- equipment safety; and
- hygiene issues, such as an infection control program that is requirement for medical facilities in Turkey.

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The EHS management program will also incorporate key requirements from the IFC's *EHS Guidelines for Health Care Facilities, April 2007*.

According to these Guidelines, health and safety hazards may affect health care providers, cleaning and maintenance personnel, and workers involved in waste management handling, treatment, and disposal. Industry specific hazards include the following:

- Exposure to infections and diseases;
- Exposure to hazardous materials / waste;
- Exposure to radiation; and
- Fire safety.

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A summary of these highlighted risks and suggested mitigation, as per the IFC's HSE Guidelines on Healthcare Facilities (2007) is provided in the following paragraphs. These will all be considered and as appropriate incorporated into the EHS plans for the Project.

Exposure to Infections / Diseases

The following measures are recommended to reduce the risk of transferring infectious diseases to health care providers:

- Formulate an exposure control plan for blood-borne pathogens;
- Provide staff members and visitors with information on infection control policies and procedures;
- Establish Universal / Standard Precautions to treat all blood and other potentially infectious materials with appropriate precautions, including:
 - Immunization for staff members as necessary (e.g. vaccination for hepatitis B virus)
 - Use of gloves, masks, and gowns
 - Adequate facilities for hand washing

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- Procedures and facilities for handling dirty linen and contaminated clothing, and preparing and handling food;
- Appropriate cleaning and waste disposal practices for the health care workplace.
- The following recommendations should be implemented when using and handling of needles / sharps:
 - Use safer needle devices and needleless devices to decrease needle stick or other sharps exposures
 - Do not bend, recap, or remove contaminated needles and other sharps unless such an act is required by a specific procedure or has no feasible alternative
 - Do not shear or break contaminated sharps
 - Have needle containers available near areas where needles may be found
 - Discard contaminated sharps immediately or as soon as feasible into appropriate containers
 - Used disposable razors should be considered contaminated waste and disposed of in appropriate sharps containers
- Establish policies to exclude animals from facility property.

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In addition to the above recommendations, the following measures are applicable to personnel involved in waste management to reduce the risk of transferring infectious diseases:

- Implement immunization for staff members, as necessary (e.g. vaccination for hepatitis B virus, tetanus immunization);
- Provide adequate supplies of PPE for personnel involved in waste management including: overalls / industrial aprons, leg protectors, boots, heavy duty gloves, helmets, visors / face masks and eye protection (especially for cleaning of hazardous spills), and respirators (for spills or waste involving toxic dust or incinerator residue) as necessary; and
- Provide washing facilities for personal hygiene, particularly at waste storage locations.

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Exposure to Hazardous Materials and Waste

Healthcare facility workers may be exposed to hazardous materials and wastes, including glutaraldehyde (toxic chemical used to sterilize heat sensitive medical equipment), ethylene oxide gas (a sterilant for medical equipment), formaldehyde, mercury (exposure from broken thermometers), chemotherapy and antineoplastic chemicals, solvents, and photographic chemicals, among others. In order to minimize the health impact risk, a Waste Management Plan (WMP) will be developed and

include measures to manage hazardous, non-hazardous materials and wastes.

Waste Anesthetic Gas (WAG) Exposure

Health care workers may be at risk of toxic exposure to nitrous oxide; halogenated agents halothane (fluothane) enflurane (ethrane), isoflurane (forane); and other substances typically used as inhalation anesthetics.

Recommended measures to control exposure to waste anesthetic gas (used in the operating room for example) include the use of a scavenging unit attached to the anesthesia unit. The scavenging unit may have a charcoal filter that absorbs halogenated anesthetic gases, but not nitrous oxide. Spent charcoal filters should be disposed of as hazardous waste. If there is no scavenging unit, or if the scavenging unit does not have a filter, vacuum lines can be used to collect WAGs which are subsequently vented outside and dispersed. Design and technologies of the Project buildings to be finalized will address these issues in accordance with Turkish law and good international practice.

Radiation

Occupational radiation exposure may result from equipment emitting X-rays and gamma rays (e.g. CT scanners), radiotherapy machines, and equipment for nuclear medicine activities. The Etlik Healthcare facility operators will develop a comprehensive plan to control radiation exposure, in consultation with the affected workforce. This plan will need be refined and revised as soon as practicable on the basis of assessments of actual radiation exposure conditions, and radiation control measures will need to be designed and implemented properly in accordance with Turkish law and international good practice defined in such as International Atomic Energy Agency (IAEA) standard.

Fire Safety

The risk of fire in health care facilities is significant due to the storage, handling, and presence of chemicals, pressurized gases, boards, plastics, and other flammable substrates. Fire safety recommendations applicable to occupational areas are presented under 'Occupational Health and Safety' in the General EHS Guidelines of IFC. Recommendations applicable to buildings accessible to the public, including health care facilities, are presented under 'Life and Fire Safety' in the General EHS Guidelines of IFC. Additional recommendations for fire safety include:

- Fire prevention addresses the identification of fire risks and ignition sources, and measures needed to limit fast fire and smoke development. These issues include:

- Fuel load and control of combustibles
- Ignition sources
- Interior finish flame spread characteristics
- Interior finish smoke production characteristics
- Human acts, and housekeeping and maintenance

- Means of egress includes all design measures that facilitate a safe evacuation by residents and/or occupants in case of fire or other emergency, such as:

- Clear, unimpeded escape routes
- Accessibility to the impaired/handicapped
- Marking and signing
- Emergency lighting

- Installation of smoke alarms and sprinkler systems;
- Maintenance of all fire safety systems in proper working order, including self-closing doors in escape routes and ventilation ducts with fire safety flaps;
- Training of staff for operation of fire extinguishers and evacuation procedures;
- Development of facility fire prevention or emergency response and evacuation plans with adequate guest information (this information should be displayed in obvious locations and clearly written in relevant languages).

In accordance with IFC General Guidelines, an independent life and fire safety audit will be carried out against Turkish and international life and fire safety standards such as National Fire Protection Association (NPTA) as soon as possible after contract signature.

Occupational Health and Safety Monitoring

The working environment should be monitored for occupational hazards relevant to the Project. Monitoring should be designed and implemented by accredited professionals as part of an occupational health and safety monitoring program.

Facilities should also maintain a record of occupational accidents and diseases and dangerous occurrences and accidents.

2.3.2. Contractor Management Plan

The Project Company has overall responsibility for the Project, yet much of the work will be done by third parties. This includes the main construction work that will be undertaken during the construction and commissioning stages. During the

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construction phase, the Project Company will have overall responsibility for environmental and social compliance, and will act as the coordinating body for all contractors and their sub-contractors. In this regard, the Project Company will prepare, implement and update where necessary, a **Contractor Management Plan (CMP)** to ensure that all contractors are fully aware of the relevant commitments around the management of environmental and social impacts and are in turn committed to its successful implementation.

The main components of the Contractor Management Plan will include:

- Designated senior managers of the Project Company responsible for the Contractor Management Plan (or portions thereof, as relevant for the Project Stages);
- Training and awareness sessions for the responsible persons in the Project Company's contracting/procurement department regarding ESMMP requirements for contractors;
- All relevant ESMMP provisions (including requirements regarding occupational health and safety) will be included in tender documents for subcontractors;
- Contractors' capacity to meet the ESMMP requirements (i.e. sufficient skills and experience) will be screened and included in the award decision criteria;
- Each contract will reflect the requirements of the ESMMP and include appropriate non-compliance remedies. Contracts will also include clauses that require subcontractors to be subject to the same obligations as the main contractor;
- The contractor will be required to provide appropriately skilled and trained EHS staff and to ensure that all activities are carried out in accordance with the Turkish EHS legislation and international best practice (such as EBRD's Performance Requirements and the IFC Performance Standards);
- The contractor and subcontractors will have to demonstrate appropriate skills and qualifications regarding health and safety or will receive comprehensive health and safety training at the beginning of an appointment and thereafter on a regular basis throughout the construction period. Special safety instructions will be provided for temporary and/or young workforce. Young people will not be employed in hazardous work;
- In the event that foreign firms are contracted and significant numbers of foreign workers will be involved in the Project, special attention will be given to ensure that all Turkish and international labor laws and regulations (e.g. ILO core labor standards such as in respect to child labor, working hours, overtime compensation, etc.) are complied with;

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- The Project Company will routinely monitor the performance of contractors with respect to ESMMP requirements.

Key Performance Indicators for Contractor Management:

- Publication of delegated roles and responsibilities, with regards to contractor management, on the Project Company project website;
- Training records;
- Examples of tenders and contracts with specific requirements and clauses around ESMMP commitments; and
- Inclusion of contractor ESMMP performance in the Project's ESMMP audits.

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3.3.2. HSE Policy for Construction

Astaldi, the leader of the EPC Contractor team, has a corporate policy stating *"ASTALDI has always been committed to performing works and providing services able to fully satisfy its customers' requirements and to achieving the growth targets envisaged in its own business plan. This is in order to increase the company's value within a vision of sustainable development which therefore guarantees the health and safety of its own employees and the community and safeguards the environment the company operates in."*

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In line with this statement, a specific HSE Policy for the Project will be developed by the Project Company and the EPC Contractor.

Astaldi also states a number of commitments that will be built upon in the HSE plan for the Project:

- Guarantee of compliance with environmental and safety legislation;
- Satisfaction of customers' requirements;
- Consideration of stakeholders' viewpoints in the company development strategy;
- Prevention and reduction of pollution; and
- Prevention of industrial accidents and occupational diseases and reduction of health and safety-related risks.

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These commitments by Astaldi are adhered to on all their projects through the adoption of an integrated quality, environment and safety management system. The system aims to achieve ongoing improvement of the group's performance and is inspired by standards ISO 9000, ISO 14000 and OHSAS 18001, which currently represent the bench marks of industrial safety.

The Project Company will also discuss with the MoH's possible consideration to achieve accreditation of international hospital management benchmarks such as Joint Commission International (JCI) for the Project as well as develop a joint plan for the accreditation.

4.3.2. Annual ESMMP Performance Monitoring and Reporting

The Project is considered by the EBRD as a "Category A" Project. It is a large scale urban development project in Turkey which has potentially significant and diverse adverse future environmental and social impacts. As such, the Project Company will retain qualified specialists to undertake periodic monitoring/audits throughout construction and operation of the Project. It is expected that an initial ESMMP audit will take place within six months of the start of each new Project Stage (Planning, Construction, Operation and Maintenance, Decommissioning), and based on the results, the subsequent audit schedule will be agreed, but be at least annually.

The ESMMP audit results will be documented and forwarded for review by the Project Manager and lenders to the Project. In accordance with EBRD policy on information disclosure, the audit results will be disclosed to the relevant affected parties and stakeholders.

The ESMMP audit reports will cover the status of EHS and ESAP related aspects, for example permits; the status of obligational compliance arising from licenses or permits; non-compliance with regulatory environmental standards, including root cause analysis; corrective measures, as well as conformance with the ESMMP and ESAP. The audits will address the performance of both the Project Company and any contractors or subcontractors. Depending on the findings, it may be necessary to revise the original ESMMP and ESAP to better reflect the changing situation during Project implementation, and/or the social, environmental or regulatory framework conditions.

Furthermore, with co-operation of the MoH and the Project Company a hospital audit by a third party will be undertaken, based on IFC Self-Assessment Guide to Health Care Organisations. This will be undertaken within 18 months of the hospital starting operation.

Key Performance Indicators for ESMMP Monitoring:

- Engagement of a qualified external expert to undertake the initial and periodic ESMMP audits including assessment of the implementation of ESAP;
- Submittal the initial ESMMP Audit Report to lenders and affected

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stakeholders. The report will also be published on the Project website;

- Carry out a third party hospital audit in accordance with IFC Self-Assessment Guide to Health Care Organisations and submit the report to lenders of the Project.

5.3.2. Communication and Grievance Procedure

The Project Company will develop and implement a Public Communication Program to provide ongoing information to affected and interested stakeholders about the key environmental and social aspects throughout the future of the Project. This program will build upon the stakeholder engagement already undertaken and be in line with the Stakeholder Engagement Plan (SEP) for the Project. The Program will be publicized on the Project website, in mass media, bulletins, brochures, emails, direct mailings and other communication forms to reach key stakeholders. The main elements of the Public Communication Program are:

- the timely and appropriate provision of information to the neighborhood* local businesses and land users prior to and during local construction activities (whether directly by the Project Company and/or through the Construction Contractors) as well as the patients in the existing six hospitals to be closed in Ankara, the general public, medical staff and contract workers in the existing six hospitals.
- provision of information on at least an annual basis to stakeholders to keep them informed of the Project schedule and when/where activities are planned.
- disclosure of the Grievance Procedure for the Project. The Grievance Procedure allows stakeholders to formally register any complaints/grievances they have with regard to Project activities and personnel. This is throughout all stages of the Project life cycle.
- update of the Grievance Procedure as appropriate during the course of the Project.
- the establishment of a conflict resolution committee (comprising representatives of the Project Company and other persons as appropriate) for the management of complex grievance issues. The aim being to quickly and effectively respond to stakeholder and public concerns.
- the establishment of a database of all grievances received..

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6.3.3. Staff Grievance Procedure

The SPV does not have a formal grievance mechanism for employees. The Company currently uses billboards for workers for announcements and grievances. Problems and / or issues of employees are solved through face-to-face communication. However the SPV acknowledges that this must be put in place and is going to establish a grievance mechanism for construction and operation workers before recruitment for the Project commences. The grievance mechanism will be applicable to direct and indirect (i.e. contracted) employees.

The MoH has a general grievance mechanism that is used for health employees' rights. "113- Employee Rights and Safety Unit" is a phone line developed for health employees living across the country that is accessible 24 hours a day, every day of the week.

7.3.2. Safety Regulations for Construction

During construction activities, adequate safety measures need to be in place, especially for excavation works, working at heights, project site traffic, and operation of workers accommodation facilities. There is a specific Traffic Management Plan being developed for the project which covered construction traffic. An outline of this can be found in Appendix K of the ESIA Report.

Excavation and working at heights are amongst the most significant occupational hazards associated with the construction activities. Other significant hazards include the use of high capacity hoisting equipment and provisional electrical power installations. Astaldi's construction OHS procedures will be updated to include specific sections on construction safety, including emergency rescue procedures, and crane/lifting equipment safety.

Project construction activities will include the erection and operation of temporary worker accommodation facilities for approximately 3,000 workers. This accommodation will be designed and operated according to internationally accepted health and safety standards in Turkish Labor Law and IFC/EBRD's guidance on workers accommodations, which cover aspects such as the number of occupants per room, number of sanitary facilities per worker, ventilation and temperature requirements and other design criteria for the cafeteria and recreational areas of the facilities.

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8.3.3. Security Responsibilities (Site Entry Procedure, Restrictions, Exit Procedures) for Construction

Unarmed guards will be contracted to monitor and control the entrance and exits of the construction site. In addition to the guards, there will be a close-circuit television (CCTV) system to monitor the entrance and exit of the site as well as fences around the border. Orientation training for construction workers will cover security arrangements and be applicable to all visitors to the site in addition to the hired workers. During the operational phase, the Project Company will extend its existing security program to the new installations. All security arrangements and responsibilities will be detailed in the HSE Plan for the Project.

Reference documents needed for the compilation of a comprehensive HSE Plan in terms of the legal framework are as follows:

- Labor Law No 4857;
- Regulations issued pursuant to Labor Law No 4857;
- Occupational Health and Safety Law 6331;
- Regulations issued pursuant to Labor Law No 6331;
- OHSAS 18001 Documents;
- ISO 14001 Documents; and
- Pertinent Standards and Specifications

9.3.2. Accident and Incident Response and Reporting for Construction

During the construction phase, the EPC Contractor together with their subcontractors, are required to train employees on workplace risks, their prevention and control, including the use of personal protective equipment (PPE), hazardous materials handling, and emergency response. The EPC Contractor will have a first aid doctor, nurse, and ambulance available for use at all times during the construction phase as part of its emergency preparedness and response plans. In addition, construction activities will follow site-specific traffic safety management plans designed to prevent traffic accidents.

Activities will be routinely monitored, inspected, and audited. Incidents and accidents will be investigated according to a documented procedure so that steps can be taken to prevent reoccurrence.

10.3.3. Site Layout Plan with Muster Points for Construction

Muster points within construction areas and temporary worker accommodation facilities have not yet been identified on the existing site layout plans. These will be confirmed following preparation of the HSE Plan for the Project.

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11.3.4. Material Handling and Storage for Construction

The HSE Manager and the HSE officers will ensure material handling and storage is conducted in an appropriate manner. All materials will be handled and stored with the utmost care. Subcontractors will ensure that their employees are properly trained in moving, lifting, grabbing, hoisting, team lifting etc., and in using any accessories for handling materials. No employees are to be exposed to material handling that may injure themselves or others in their area. All temporary storage areas for materials will be contained, well-organized and secure.

Materials (cement and aggregate) to be used in the concrete batching plant will be brought in from outside the Project area. The proposed transportation routes will be carefully selected and well managed. Information about these routes will also be shared with local stakeholders.

Storage areas for subcontractor's materials will clearly be designated. The subcontractor will be responsible for informing the EPC Contractor five days prior to a material shipment arriving at the project site, to ensure proper planning for storage. The subcontractor is solely responsible for any materials brought onto the site. However this responsibility does not relieve the responsibility of the EPC contractor since the EPC contractor is responsible for any incompliance at the site against the SPV.

Any equipment utilized in the movement and storage of materials shall be in good condition, and shall meet the manufacturer's specifications, and all applicable national and international standards and codes. All personnel utilizing such equipment shall be appropriately trained. The subcontractor is solely responsible for such training and retraining, as required.

During the construction phase of the Project, some of the heavy earth moving and transport equipment will require the use of gasoline and/or diesel fuel which will be stored in portable, skid-mounted, fuel oil storage tanks with secondary spill containment basins. All construction sites and construction storage yards will be equipped with spill containment and clean up kits and the appropriate training will be delivered for their effective deployment. Materials such as asbestos, PCBs and CFCs, will be avoided in the construction of new facilities as specified in Turkish legislation and international best practice.

In line with the above explanations, the EPC contractor will prepare a detailed material handling and storage procedure in-line with the Project HSE Plan.

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12.3.2. Storage of Hazardous Waste for Construction

Construction and operation activities will generate potentially hazardous wastes, such as waste oil or used cleaning solvents from equipment maintenance and repair activities. These materials will be temporarily stored in closed containers and placed in specially designated areas with secondary containment and protection from the weather until such time as they can be transported and managed by a specialized, licensed, contractor in an environmentally sound manner. Turkey's waste management legislative framework is almost fully in line with that of the EU and will be applied to all activities. It should be also noted that there is a specific Waste Management Plan (WMP) located in Appendix M of the ESIA Report which deals with hazardous and non-hazardous wastes to be generated during the Project.

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13.3.2. Plan for Training and Toolbox Talks for Construction

During the construction phase, the EPC Contractor and its subcontractors will implement an initial training plan during Project startup. This training will train key project management personnel, including the Site Manager, HSE Manager, Site HSE Officers, Site Section Chiefs, and Site Engineers, among others, on key aspects of Astaldi's OHSAS 180001 management system. There will also be project orientation training for all hired workers. Contractors will prepare a detailed on-going training program that aligns with Astaldi's - Human Resources Management Plan (HRMP). These training requirements will be applicable to the EPC's own employees and those of its subcontractors and clearly stated in all contractual agreements.. New direct employees and subcontractors will be required to understand the occupational hazards associated with their assigned responsibilities and other relevant aspects of the Project's HRMP. Induction and on-going training activities will include project kick-off meetings conducted by experienced professionals responsible for HSE matters and daily tool-box meetings conducted by HSE and construction team supervisors.

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14.3.2. Personal Protective Equipment (PPE) for Construction

One of the most crucial duties of the employer is to provide all the necessary safety equipment to employees including helmets, safety goggles, protective clothing, gloves, safety belts, safety ropes, etc. Moreover, such equipment shall be designed and produced in compliance with the Regulation on Personal Safety Equipment ("Kişisel Koruyucu Donanım Yönetmeliği" in Turkish). In this respect, appropriate PPE will be used by the workforce in the workplace during the construction. The EPC Contractor and its subcontractors will be required to train their employees in understanding workplace risks and their prevention and control, including the use

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of personal protective equipment (PPE), hazardous materials handling, and emergency response.

15.3.2. Fire Preventions for Construction

Fire prevention planning requirements are included in the SPV's contract with the MoH. Fire prevention procedures including a Fire and Emergency Evacuation Plan will be prepared. Evaluation Plans (including modeling) with a scale of 1/200 will be prepared during detailed design. In addition, life safety means with a scale of 1/200 will be prepared in the ongoing design phase. In the latter design stages, documents on Evacuation Planning and Life Safety Means will be available as drawings.

16.3.3. Fall Protection for Construction

Access to roofs and other areas requiring fall protection hazard controls will be identified with appropriate signs. The term "Fall Protection" refers to any form of fall protection hazard controls that may include: guardrail systems; safety net systems; personal fall arrest systems; or other fall protection measures.

In Turkey, requirements of the 92/57/EEC - Council Directive on the implementation of minimum safety and health requirements at temporary or mobile construction sites (eighth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC) were integrated into the Turkish Regulation on Health and Safety Regarding Construction Work ("Yapı İşlerinde Sağlık ve Güvenlik Yönetmeliği" dated 23.12.2003 and numbered 25325). Chapter II of the Turkish Regulation (Article 5) stipulates the requirements for fall protection. The Regulation on Health and Safety Regarding Construction Work states that when working at these designated heights, the employer is obliged to provide a secure barrier, platform safety nets and a scaffold built by authorized technical personnel.

17.3.4. Emergency Response for Construction

During the construction phase, the project contractors will prepare and implement Emergency Preparedness and Response Plans. Emergency management procedures will be identified in detail in the Environmental and Social Management System (ESMS) of the EPC Contractor. Astaldi as the leader of the Joint Venture forming the EPC Contractor will prepare a Project Management Plan (coded as "PGP" in their internal system) which will cover health and safety planning (coded as "PGS") and environmental and social planning (coded as "PGA").

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18.3.5. Vehicle Use and Maintenance Plan for Construction

Motor vehicles (heavy equipment) intended primarily for off-roadway use will be equipped with appropriate safety features, including an operating emergency brake system; head-, tail, and brake lights; windshield wipers; and backup alarms.

19.3.2. Archaeological Chance-find Procedure

Policy

The Project Company commits to avoiding impacts on cultural heritage that could be affected by the Project.

Objectives

The objectives of the Project Company's archaeological chance find procedure are:

- to mitigate damage and risks to identified archaeological and cultural heritage; with a view to supporting the conservation of cultural heritage in the context of Etlik IHCP;
- to make sure that all project staff are aware and trained on procedures of protecting cultural heritage and archaeological resources prior to undertaking any activities that could potentially affect these resources; and
- to ensure compliance with laws and regulations related with archaeology and cultural heritage.

Roles and Responsibilities

The Site Manager is responsible for supervising all field teams during construction.

The HSE Manager is responsible for the overall management of environmental issues, which also includes cultural heritage. The ES Manager will cooperate with the Site Manager with regards to the requirements around cultural heritage legislation and implementation of the Chance Find Procedures. The Project Manager has ultimate responsibility for the chance find procedure.

An environmental management and monitoring team will work under the ES Manager and be responsible for guiding the field staffs in the event of a chance find.

An Archaeology Consultant will be hired to give periodic training to field staff, mainly during the construction stage when earth works are most intense. The consultant will be referred to in the event of a chance find for their advice and for recording the found items. All environmental and operations staff on the ground will

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be trained to recognize possible archaeological and cultural heritage resources and to take necessary immediate actions in compliance with the national legal framework.

20.3.2. Code of Conduct and Responsible Procurement

A Code of Conduct will be prepared by the SPV in accordance with the relevant national and international laws. The main HR processes will align with Astaldi's HR policies which include:

- __ creation and updating of organization structures and of organization charts;
- __ planning Human Resource needs during Tender Phase;
- __ planning of Head Office / Country Seat / Project needs for Human Resources during Budget Phase;
- __ selection of personnel within and out of the Group in order to ensure personnel provided have the necessary skills to carry out the relevant activities;
- __ employment / relocation of personnel between the Group's production units;
- __ assessment of personnel's skills and performance;
- __ remuneration policy: promotions and increase in remuneration;
- __ remuneration policy: rewarding system and
- __ training.

This procedure applies to the personnel of ASTALDI S.p.A. working in Italy and abroad, to the personnel of Astaldi Concessioni S.r.l. and to any temporary association with companies and joint ventures (within which Astaldi S.p.A. acts as Leader) and newly hired personnel.

21.3.2. Anticorruption

The fight against corruption is crucial, in particular, to achieve economic and political stability, to attract foreign investors and to establish the rule of law. Turkey has a strong stance on anti-corruption as it strives to join the European Union. As part of the EU harmonization process, Turkey has signed International Agreements and Resolutions for Anticorruption resolution. The Project Company will work in accordance with this agreement as well as national and international laws, such as:

- 1) February 2000 - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, approved by Law No. 4518.
- 2) March 24, 2001 - Contains the priority objectives of the fight against corruption involving Turkey's National Program for the Adoption of the EU Acquis Implementation, Coordination and Monitoring of the Decision was adopted on.

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- 3) April 17, 2003 - The Council of Europe's Criminal Law Convention on Corruption, ratified by Law No. 4852.
- 4) 10 December 2003 - United Nations Convention against Corruption, signed by Turkey.
- 5) January 14, 2004 - The Council of Europe Criminal Law Convention on Corruption, ratified by Law No. 5065

4. Specific Mitigation Actions

The specific recommended mitigation measures for each Stage of the Project are given in the environmental and social management and monitoring matrices presented in Annex-B. For each item the following information is provided:

- __Key activities/aspects that result in a potential impact;
- __Potential significant impacts of the activities (these are negative impacts unless stated otherwise);
- __Recommended mitigation or enhancement measures;
- __Key Performance Indicators (to show/confirm the mitigation measures are implemented); and
- __The extent of any residual impacts (following implementation of the mitigation and enhancement measures).

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Annex-A: Table of Content of Medical Waste Management Plan within the Units**I General Information**

- I.1. Name of Healthcare Unit:
- I.2. Address:
- I.3. Phone:
- I.4. Fax:

II Administrative Information

- II.1. Affiliated Organization:
- II.2. Type of Healthcare Unit:
- II.3. Number of Beds:
- II.4. Responsible Person for Medical Waste:
- II.5. Telephone Numbers of Responsible Person:

III Waste Management**III.1. Waste Minimization**

- III.1.a) Works to minimize household waste generation and amount
- III.1.b) Works to minimize packaging waste generation and amount
- III.1.c) Works to minimize medical waste generation and amount
- III.1.d) Works to minimize hazardous waste generation and amount

III.2. Waste Collection and Storage at the Source

- III.2.a) Collection of household waste at the source, equipment to be used and equipment properties
- III.2.b) Collection of packaging waste at the source, equipment to be used and equipment properties
- III.2.c) Collection of medical waste (including sharps, needles, swabs) at the source, equipment to be used and equipment properties
- III.2.d) Collection of hazardous waste at the source, equipment to be used and equipment properties

III.3. Transport of Waste and Equipment & Vehicles to be used in Transport

- III.3.a) Transport of household waste, vehicles to be used in transport
- III.3.b) Transport of packaging waste, vehicles to be used in transport
- III.3.c) Transport of medical waste, vehicles to be used in transport
- III.3.d) Transport of hazardous waste, vehicles to be used in transport

III.4. Locations of Waste Collection and Storage Equipment, Collection Program and Transport Route

- III.4.a) Locations of household containers, time of collection and route of waste transport vehicles
- III.4.b) Locations of packaging containers, time of collection and route of waste transport vehicles

- III.4.c) Locations of medical containers, time of collection and route of waste transport vehicles
- III.4.d) Locations of hazardous containers, time of collection and route of waste transport vehicles

III.5. Temporary Storage Systems

- III.5.a) Location and characteristics of temporary storage area for household waste (for healthcare units with and above 20 beds)
- III.5.b) Location and characteristics of temporary storage area for medical waste (for healthcare units with and above 20 beds)
- III.5.c) Location and characteristics of temporary storage containers for household waste (for healthcare units with and above 20 beds)
- III.5.d) Location and characteristics of temporary storage containers for medical waste (for healthcare units with and above 20 beds)
- III.5.e) The nearest temporary storage area that medical waste can be transferred for temporary storage (for healthcare units with no beds and for units listed in Appendix 1 of the By-law)

III.6. Cleaning and Disinfection of Collection Equipment

- III.6.a) Procedures for cleaning and disinfection of medical waste transport vehicles and temporary waste storage areas or containers
- III.6.b) Disinfecting agents to be used for the purpose of disinfection

III.7. Measures and Procedures in Case of Accident

- III.7.a) Measures and procedures in case of injuries during collection, transport and temporary storage of medical waste
- III.8.b) Measures and procedures in case of injuries, spillage and spreading during collection, transport and temporary storage of medical waste
- III.8.c) Notification, record keeping and reporting of possible injuries, spillage and spreading and other accidents that may occur during collection, transport and temporary storage of medical waste

III.8. Responsible Personnel

- III.8.a) Personnel responsible for collection and transport of household and packaging waste and scope of work
- III.8.b) Personnel responsible for collection and transport of medical waste, scope of work and special clothing to be used during work
- III.8.c) Personnel responsible for the operation of temporary waste storage area/containers and scope of work

III.9. Record Keeping and Reporting

- III.9.a) Determination and record keeping of amount of medical waste generated

**Annex - B: Environmental and Social Management & Monitoring Plan
(ESMMP)**

The ESMMP Table is comprised of

- **1.1** Supplementary Pre-Investment Studies/Audit
- **1.2** Addendum to ESIA
- **1.3** Consolation Report
- **1.4** Stakeholder Engagement Plan (SEP) Commitment
- **1.5** Land Acquisition Compensation and Resettlement Plan (LACRP)
- **1.6** Emergency Prevention and Response Plan (EPRP)
- **1.7** 1.7 Cultural Heritage Mitigation
- **1.8** Human Resources and Labour Management Plan
- **1.9** Occupational Health and Safety Management Plan
- **1.10** Communication to the Public and Stakeholders

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Construction Period

2.1 Environmental and Social Management & Monitoring Plan

Hospital Complex Operational Period

3.1 Environmental and Social Management & Monitoring Plan for Operation

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OVER-ARCHING MEASURES	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
1.2. ADDENDUM TO ESIA				
The Project Company commits to preparing an Addendum to the ESIA Report, and an update of this ESMMP, if required, to reflect the advancement of the Project Design finalised and agreed with the Ministry of Health (MoH)	The Project Company (Environment Manager)	Prior to the commencement of the Construction	KPI: An Addendum satisfactory to Lenders is prepared and is disclosed on the Project website	
1.3. CONSULTATION REPORT				
The Project Company commits to preparing a Consultation Report, as part of the finalisation of the Draft ESIA Report that summarizes the comments received during the 60-day Disclosure Period and explains how the comments have been considered in the final ESIA Report.	The Project Company (Environmental Manager)	Within 2 weeks (English summary) and 2 months (Turkish version) of finalization of consultation period	KPI: Draft Summary Report (reflect comments up to day 60 of consultation) issued on the website within 2 weeks of disclosure; Final Report disclosed in Turkish on website 2 months after Draft.	
1.4. SEP COMMITMENT				
The Project Company commits to implementing the Stakeholder Engagement Plan – SEP for this Project and keeping the SEP updated as the project progresses – at least annually.	The Project Company (Assigned Manager)	On-going and at the time of Lender contract with the Project Company to be materialised	KPI: SEP is published online on the Project website and subsequently distributed during the 60-day disclosure process.	SEP Document
1.5. LACRP COMMITMENT				
The Project Company commits to implementing the Land Acquisition Compensation and Resettlement Plan if applicable	The Project Company (Assigned Manager)	After completion of the 60-day disclosure period and finalisation of the LACRP	KPI: LACRP is published online on the Project website and subsequently distributed during the 60-day disclosure process.	

OVER-ARCHING MEASURES	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
1.6. EMERGENCY PREVENTION AND RESPONSE PLAN (EPRP)				
The Project Company commits to implementing an EPRP for Spill Containment and Clean-up, engineering contingencies, and other emergencies (e.g. outbreaks of infectious disease, natural hazards) to include: • The emergency response in the event of spills, fire, accidents, earthquake, flood • Where medical rescue and fire-fighting resources and spill response equipment will be available along the route. Locations to be informed by the spill risk assessment • Procedure for staff and subcontractors to report any incidents and the investigation, remediation and preventive actions taken. • Regular emergency response training including in the use of spill response equipment • Emergency Communication Procedure including with local communities and authorities Contractors and Sub-Contractors will develop and prepare site-specific EPRPs in line with this overarching plan. The EPRP will be updated and expanded as needed for implementation of the Project	The Project Company	On-going and prior to the commencement of the construction	KPI: A site specific EPRP to be provide to the Lender 's satisfaction	

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OVER-ARCHING MEASURES	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
1.7. CULTURAL HERITAGE PROTECTION PLAN				
The Project Company commits to preparing and implementing a Cultural Heritage Protection Plan which will detail: 1. Coordinating with national and regional heritage authorities 1.1. Protect the existing burial site in the Project location (which was studied by an archeological professor and report was prepared; and the parking area design was altered) A Chance Finds Procedure (CFP) will form part of the Cultural Heritage Protection Plan and will be executed under the technical direction of the Project Company's Environment Manager. It will set out: 2. That all areas are subject to CFP. 3. The procedures for ground clearance adopted by the Project Company 4. The training of all site personnel in the recognition and proper handling and custody of archaeological finds which are the property of the Turkish Government; 5. The protocols for responding to chance finds including notifying Protection Councils 6. An active look ahead Construction site inspection program over the next construction section	The Project Company (Environment Manager)	Submittal of the Procedure prior to the Commencement of the Construction.	KPI: The Procedure satisfactory to the Lenders is prepared 7. Confirmation of the protection of the burial site 8. Records of finds	

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OVER-ARCHING MEASURES	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
1.7. HUMAN RESOURCES AND LABOUR MANAGEMENT PLAN				
The Project Company commits to set up and implement a Human Resources and Labour Management Plan in line with international benchmark that sets out the approach to delivering the Project Company Human Resources Policy including a Workers Grievance Procedure all through the Project stages (<i>the Project Company of is a Turkish and Italian joint venture, and each of them are accredited with OFSAS18001</i>). The Company commits that the tender and contract document of the subcontractors ensure that their HR management is fully reflected of the Project Company's HR and OHS policy all through the Project stages.	The Project Company	Prior to the Commencement of the Construction By 3 months prior to start of Hospital Complex	KPI: A HR/Labour Management plan is prepared to satisfaction of Lenders. - Subcontract Management Plan in relation to HR and Labour conditions - Worker Grievance procedure - If applicable, Labour Audits	← Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5"
1.8. OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN				
The Company commits to set up and implement an Occupational Health and Safety Plan in line with international bench marks including an Occupational Health and Safety Communication and Training Programme which will apply during the Construction Phase across all contractors. The Plan will subsequently be updated as appropriate for the subsequent Operation Phase, specifically medical facilities.	The Project Company	Prior to the Commencement of the Construction	KPI: A plan is prepared to satisfaction of Lenders. ⇒ H&S Audits	← Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5"
1.9. COMMUNICATION TO THE PUBLIC AND STAKEHOLDERS				
The Company commits to set up and implement communication venues to inform the Project that sets out the following: Construction Phase - Programme for the community in general, and vulnerable persons, to raise awareness of the Project and provide information on the closure timing of the existing 6 hospitals and	The Project Company, MoH, relevant municipalities and district authorities	On-going and prior to the Commencement of the Project hospital complex.	KPI: Information Outreach Programme to be prepared to satisfaction of Lenders.	← Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5", Tab stops: 0.3", List tab

OVER-ARCHING MEASURES	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
mitigation measure to minimise the impacts on the patients and the employees • Operation Phase - Prior to commencement of operations, the Project Company will communication for the concerned/public on relevant potential impacts from the closure of the 6 existing hospital as well as smooth transfer of the employee working in the existing 6 hospitals and services received from there to the Project hospital complex by detailing the employee transfer/service provisions/procedures.				

OVER-ARCHING MEASURES CONSTRUCTION STAGE	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
2.1 ENVIRONMENTAL AND SOCIAL MANAGEMENT & MONITORING PLAN				
An Environmental and Social Management & Monitoring Plan will be prepared to developed in international bench marks to be incorporated into the Project (<i>The Project Company is a venture of Turkish and Italian firms, and each of them are accredited with ISO9001 and 14001</i>). -Contractor environmental performance management - Hazardous material storage - Air quality management plan - Noise management plan - Construction waste management plan -Archaeological change find procedure and - Traffic management plan Organisational charge to be updated Environmental chief name with defined roles and responsibilities. Training programme and records keeping the employees are adequately trained so they have the knowledge and skills to perform their work effectively.	The Project Company (Design Manager)	Prior to the Commencement of the Construction	KPI: Approved Environmental and Health Manger as part of the Project Company specifically for the Project; Monitoring: Progress with the preparation of the ESMMP to be reported monthly.	

OVER-ARCHING MEASURES CONSTRUCTION STAGE	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
Worker housing compounds will be built and maintained at the construction camp areas during the Construction period. These will be designed and operated in accordance with international best practice and the guidance document: Workers' Accommodation: Processes and Standards A Guidance Note by IFC and the EBRD, 2009	The Project Company	Prior to the commence of construction works and during the construction	The Project Company checks the designs to verify solutions as part of design approval process. Audits of worker accommodation	

OVER-ARCHING MEASURES CONSTRUCTION PERIOD	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
The following Procedures will be included: Waste and Wastewater Management Procedure, to include measures for: *○ correct handling, transport and disposal of waste (both hazardous and non-hazardous waste); *○ reducing waste streams and emissions to air, water and soil; *○ labeling of waste containers and record keeping *○ Identifying and utilizing appropriate waste disposal sites; *○ appropriate wastewater treatment and discharge; *○ appropriate handling of Site Run-off and drainage *○ Storage of fuels, oils and hazardous materials on suitable sized impervious and bonded base and use of drip trays for fuelling *○ Regular assessment of waste streams to evaluate potential for re-use and recycling		Same as for above Plan		

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OVER-ARCHING MEASURES CONSTRUCTION STAGE	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
2.1 ENVIRONMENTAL AND SOCIAL CONSTRUCTION MANAGEMENT PLAN				
An Environmental and Social Construction Management Plan will be prepared to detail how the mitigation identified in the ESIA will be delivered during Construction. The ESCMP will comprise a series of procedures for each construction stage that set out the actions (and those responsible for implementing the actions) necessary to achieve the mitigation of the impacts. The ESCMP will detail - the approach to training and regular awareness-raising with respect to environmental and social issues for both for the Project Company employees and all relevant contractors to implement the Construction; - Mechanisms for inspections and monitoring of compliance with the ESCMP and its associated procedures. Compliance with the ESCMP will be monitored in each subcontract area. The following Procedures will be included: Soil Management Procedure to include: - Measures to prevent erosion from excavated areas and soil storage heaps: - Prevent sediments flowing into surface waters and drainage channels by localised control measures (e.g. sediment fences, check dams, mulch barriers, , sediment basins), appropriate contouring to optimise slope angle and steepness, - Prevent wind erosion via fencing, covering, etc. Hazardous Materials Management Procedure to include: - Procedures for handling and storage of hazardous materials in accordance with manufacturer's instructions, Turkish law and IFC EHS Guidelines for Decommission and Construction. - Register of hazardous materials and identification of dangers posed by	The Project Company (Environment Manager)	Plan submitted by the commencement of the Construction Implementation during Construction. Six-monthly review and update	KPI: ESCMP approved by the Project Company Senior Manager - Training Records - Site specific procedures approved by the Project Company Environmental Manager - Monitoring Records	Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.25" Formatted: Indent: Left: 0", Bulleted + Level: 1 + Aligned at: 0.28" + Indent at: 0.53" Formatted: Bulleted + Level: 1 + Aligned at: 0.51" + Indent at: 0.76" Formatted: Bulleted + Level: 2 + Aligned at: 1.01" + Indent at: 1.26" Formatted: Bulleted + Level: 1 + Aligned at: 0" + Tab after: 0.25" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5"

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hazardous materials within the project site • <u>o</u> Storage of fuels, oils and hazardous materials on a suitably sized impervious and bunded base • <u>o</u> Use of drip trays for fuelling • <u>o</u> No fuelling of vehicles or equipment will take place within excavated areas, if practically feasible. • Training of on-site personnel on the presence, handling, transport and disposal of hazardous materials and on emergency response management. • Provision of personal protective equipment (PPE) to staff that are required to handle certain chemicals. • Ensure proper ventilation when handling with hazardous materials • Protect public from major hazards associated with hazardous materials incidents or process failure, as well as nuisance issues related to noise, odours, or other emissions				
Waste Management Procedure to include: • Application of waste hierarchy to avoid, segregate, re-use, recycle wastes as much as possible and as last option safely dispose wastes • Training of construction staff to ensure safe management of all types of waste preventing harm to themselves, the environment and the public • Collection and segregation of waste according to its type, whether it is re-usable, recyclable, non-hazardous or hazardous waste • Storage of wastes according to international best practice (IFC EHS General Guideline). • Use and labelling of designated waste collection containers and storage areas for different kinds of wastes (hazardous and non-hazardous). • Dispose wastes at licenced waste management sites selected as best option based on a due diligence review of material compliance of the proposed sites with EU				

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requirements				
Water Management Procedure to include: - Deals with water supply of and wastewater discharge from temporary and main construction site (including storm water runoff, wastewater generated by construction temporary accommodation and from facilities on site such as wheel washing facility etc.) Water Supply and Wastewater Discharge - Design of wastewater drainage and discharge from construction sites preventing the release of contaminants and of sediments to the receiving environment and complying with Lender Standards (includes design of collection system, separation of wastewater streams, use of bunding, and treatment as necessary). - Reuse of treated wastewater where possible (dust control etc.) - Operate construction site in a way to reducing the risk of generating sediments and wastewater that may pollute local soils or receiving water bodies (considering situations such as heavy rainfalls and activities such as cleaning construction equipment).				Formatted: Bulleted + Level: 1 + Aligned at: 0" + Tab after: 0.25" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0" + Tab after: 0.25" + Indent at: 0.25"
Air, Noise and Vibration Management Procedure to include: - Procedures for regular inspection and maintenance of all machinery and vehicles to reduce noise, dust and gas emissions from vehicles and work machinery - Measures to minimize dust, dirt and noise from transport vehicles such as : - Implementation of speed limits for trucks while travelling to and from construction sites - Avoid or minimize night time transportation through or close to villages - prohibition of engines running while waiting				Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5"

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• <u>o</u> Covering of loads and installation of wheel washing equipment for all vehicles leaving the site • Measures to minimize dust, dirt and noise from equipment: • <u>o</u> Restricting the noise to be perceived from construction to 70 dB Leq during the evening and 65 dB Leq at night as far as practicable for short term activities lasting not more than 10 days • <u>o</u> Noise levels from construction activities will be restricted to 55 dB LAeq during the evening, and 50 dB LAeq at night as far as is practicable, or to other standards that have been agreed with the local authority • <u>o</u> Limitation for operation hours for specific equipment and operations and location of noisy equipment away from receptors. • <u>o</u> The drop height of potentially dust generating materials will be kept as low as possible. • <u>o</u> Procedures for locating construction sites and stockpiles to minimize impacts on neighboring • <u>o</u> Installation of silencers or acoustic enclosures on certain machinery where applicable, such as installation of suitable mufflers on engine exhausts and compressor components as well as use of portable sound barriers around equipment like generators; • <u>o</u> Storage of excavated material between the construction site and the sensitive use locations to achieve a noise wall (with cover to avoid dust erosion) or installation of other (temporary) noise barriers. • Measures to minimize vibration from construction activities: • <u>o</u> Monitoring of vibration on commencement of relevant construction activities to identify additional mitigation measures where necessary - o ground acceleration and undertake supervision - o Use mechanical ripping to avoid the use of explosives where possible				Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5" Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.25" Formatted: Bulleted + Level: 1 + Aligned at: 0.25" + Indent at: 0.5" Formatted: Bulleted + Level: 2 + Aligned at: 0.75" + Indent at: 1"

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Community Safety Management Procedure The Project Company will establish a Community Safety Management Procedure to set out the security measures, particularly for the Construction Stage of the Project (e.g. access control by fencing of construction section.				14
Traffic Safety Management Procedure (on-site and off-site) to include: - Establishing rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures (e.g. prohibiting operation of forklifts with forks in down position). - Develop a plan for checking truck drivers regarding speed limits (speed control devices on trucks), routing rules, and duration of driving (driver rosters). - Improving of local traffic signage (where necessary). Use of signs (reflective signs and/or flashing lights for night) and positioning of flag persons to indicate work in progress and to inform and warn equipment operators and workers. - Training of Pedestrian workers to work safely around trucks and operating equipment and provide constant warnings to each other in the event of being in risky locations or conditions. - Training of drivers and operators to obey signals, be aware about blind spots and other pedestrian workers while sharing the same working site, and check their vehicles or equipments whenever needed. - Informing drivers about the site traffic rules including speed limits, approved access routes, etc. A map that shows all the access roads that exists or to be constructed for the project will be prepared and distributed to relevant drivers. - Training and licensing of industrial vehicle operators in the safe operation of				

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specialised vehicles such as forklifts, including safe loading/unloading, load limits.				

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5. OPERATIONAL PERIOD				
3.1 ENVIRONMENTAL AND SOCIAL MANAGEMENT & MONITORING PLAN FOR HOSPITAL OPERATION				
An Environmental and Social Operation Management & Monitoring Plan (ESOMMP) will be prepared to detail how the mitigation identified in the ESIA will be delivered during operation. The ESMP will set out the procedures to be followed (and those responsible for implementing the actions) to achieve the mitigation of the impacts. The ESMP will detail: - Establish the MoH and O & C Company commutation lien on ESMP as well as agree on accrediting of possible international hospital management quality accreditations such as Joint Commission International (JCI) and develop Implementation Plan - Develop systems to consolidate dual management of the MoH and O & C Company as an efficient and workable integrated management system to bring to the hospital complex to international hospital management benchmarks - Achieve agreement between the MoH and O & S for ESMP implementation - Implement HR & OHS procedures in compliance with Turkish law and in line with international benchmark - Implement Contractor Management to fully reflect ESMP for the hospital complex - The approach to training and regular awareness-raising with respect to environmental and social issues; - The best practice measures to be taken to environmental facilities management (e.g. water use, greenhouse gas emissions, waste, energy efficiency); - Measure to prevent infectious disease in the hospital complex and the surrounding environment	O&M Company, Contractor (Environmental Manager) and the MoH and other relevant ministries	two months before the Commencement of the Hospital Complex	The ESMP is approved by the O & S Company Environment Manager as well as the MoH Monitoring: six-monthly Audits of compliance by the O & C Company Environment Manager	

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OVER-ARCHING MEASURES CONSTRUCTION STAGE	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
- Measures to prevent effluent to pollute the hospital complex and the surroundings - Measures to minimize air emissions /traffic congestion from the (e.g. optimization of traffic flows) - Implement Life and Fire Safety Master Plan, regular life and fire safety check, and evacuation exercise - Ensure Security Management /practice is line with relevant Turkish law and good international practice with respect of human right - Mechanisms for inspections and monitoring of compliance with the ESMMP and its associated procedures. Compliance with the ESMMP will be a monitored. - Consultation with stakeholders based on the SEP regarding definition of the changing impacts at the Project's Operational Stage and update SEP accordingly The following Procedures will be included:				
Waste Management Procedure to include: - Development of a waste management plan regarding solid waste, hazardous waste, medical waste, radioactive waste in accordance with Turkish law and IFC EHS Guidelines for Health Care Facilities - Regular inspections of the Hospital Complex to ensure waste facilities are correctly used and are kept clean and tidy. - Maintaining full records of the type, quantity, composition, origin, disposal destination and method of transport for all wastes. Collecting solid wastes on a regular basis and disposing appropriately at a designated disposal site. - Training of the personnel on proper collection and disposal of solid wastes.				

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OVER-ARCHING MEASURES CONSTRUCTION STAGE	Implementation Entity	Timing	Monitoring/Key Performance Indicator	Reference
- Point selection of different type of waste - Labelling waste containers according to the waste type to be disposed in it. Proper labelling will also prevent any hazardous waste to be disposed together with non-hazardous solid wastes. - Application of reuse/recycling methods to minimise solid waste generation. - Using certified/licensed facilities for final disposal of solid wastes, which cannot be reused/recycled. - Management of supply inventories for avoiding the need for disposal of unused products. - Hazardous/medical wastes to be disposed of by appropriate licensed contractor - Record keeping on solid waste, medical waste, hazardous waste - Establish anesthetic gas (WAG) management plan (including the use of a scavenging unit attached to the anesthesia unit... The Design of the ward as well as the procedures needs to address this). - Establish Radioactive waste management plan in accordance with Turkish law and IEAE requirements and standards				
Hazardous Materials Management Procedure - To set out how all hazardous materials will be handled and stored in accordance with manufacturers' instructions. Relevant risk assessments should be completed prior to use. - To detail the measures for the transport of hazardous material in accordance with ADR regulations (as adopted in Turkish regulations) and with transport permission from the MoH - To set Procedures for disposal of expired medicine in accordance with Turkish law, good international practice and suppliers' instruction				

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To establish radioactive substance handling in accordance with Turkish law and IEAE requirements and standards				
Effluent Management - Ensure that laboratory waste water is collected in a special holding tank which is then treated with chlorine before entering the municipal sewage system. - Ensure that the Chemo Therapy ward is equipped with the waste water piping running on a separate line from general hospital waste water. - Ensure that areas utilising radioactive materials i.e. toilets and sinks have been re-plumbed and directed into dedicated collection tanks. - Ensure no waste water discharges to the receiving environment - Compliance with IFC and EU Guidance - Ensure separate piping for ratio therapy wards and chemo-therapy ward				Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.29" Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.29"
Infectious Disease Control Management 6. Keep hygiene standard in compliance with Turkish law and line with international benchmarks 7. Formulate an exposure control plan for blood-borne pathogens 8. Provide staff members and visitors with information of infection control policies and procedures 9. Establish universal/standard precautions to treat all blood and other potentially infectious materials (immunization for staff as necessary, use of gloves, adequate hand washing, procedures and facilities for handling dirty line and contaminated clothing and preparing and handling, appropriate clearing and waste disposal practices 10. Use safe needle devices and needless devices to decrease needle stick or other sharp exposures 11. Ensure to provide protective equipment and washing facilities				Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.29"

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Life and Fire Safety Management 1.1 Implement Fire Safety Master Plan 2.1 Organise personals in charge of life and fire safety purpose 3.1 Implement regular training for staff for life and fire safety 4.1 Implement regular evacuation exercise 5.1 Regularly check and replace fire prevention and extinction equipment				← Formatted: Bulleted + Level: 1 + Aligned at: 0.2" + Indent at: 0.49"
Hospital Audit 2.1 Implement Hospital Audit in accordance with IFC Self-Assessment Guide for Health Care Facilities after one year and half of the hospital complex operation (given the size of the hospital complex this will be an important exercise to ensure overall soundness of the hospital operation including EHS, infectious disease control and patient right.				← Formatted: Bulleted + Level: 1 + Aligned at: 0" + Indent at: 0.29"
Trigeneration emissions To set a monitoring measure for the trigeneration plan emissions				
Landscape Management Procedure to include: - Keep the hospital green area with trees and vegetation suitable for local climate. - Management of hedges and trees and maintenance of grass. - Create the environment suitable for the patients , employees and visitors				← Formatted: Bulleted + Level: 1 + Aligned at: 0.28" + Indent at: 0.53"