

SiseCamExpansion (51857)
Project Basic Information

Country: Turkiye	Region: Turkiye, Kazakhstan, Uzbekistan	Project No.: 51857
Project Legal Name: SiseCam Expansion	Company Legal Name: TURKIYE SISE VE CAM FABRIKALARI ANONIM SIRKETI	
Project Business Sector: H-CA - Glass and Glass Products (Including Glass and Mineral Wool, Excluding Glass Containers)	Owning Department /Division: Regional Industry MAS MCT	
Environment Category: B		

IFC's Disclosure Requirements

 Date of initial ESRS disclosure
 11/7/2025

Date of revised ESRS disclosure

 Date of clearance by client for factual accuracy
 10/27/2025

Board Approval Date

Project Description

IFC may provide Sisecam up to US\$250m (A Loan) and EUR300m (B1 Loan) for 5-7 years to support its glass business capex and working capital in Türkiye, covering flat, industrial, packaging, and glassware operations.

Overview of IFC's Scope of Review

IFC's appraisal of this proposed investment consisted of: i) a review of available corporate environmental, health, and safety (EHS) documents such as Şişecam 2023 Sustainability report, Occupational Health & Safety (OHS) policies, human resources (HR) policies, code of business ethics; ii) a review of TR3 EHS documents such as the Waste Management Plan, Environmental Monitoring Results, Risk Analysis, OHS Procedures, Evacuation Plan, relevant training; iii) a review of the TR9 Environmental Impact Assessment (EIA) report prepared in line with national law and approved by the Ministry of Environment, Urbanization, and Climate Change ("Ministry") approved on December 2022; and iv) a virtual meeting with the corporate HR, EHS and OHS teams from Şişecam's headquarters in Istanbul, on November 8, 2024, and site visits to TR3 and TR9 in Mersin on November 8 and December 11 to 12, 2024, respectively. The site visits included meetings with the Şişecam project management, environment, OHS teams, the EPC contractor's teams, and the Tarsus Organized Industrial Zone (OIZ) expropriation expert. The IFC team discussed the land acquisition and expropriation process by the Ministry and examined official documents received from the expert. The annual monitoring reports for the existing glass plants in Türkiye were reviewed.

Şişecam engaged an accredited third-party consultant to prepare the report for the TR9's local Environmental Impact Assessment (EIA). The Ministry approved the EIA in 2022 for a capacity of 1200 tons/day of flat glass and 600 tons/day of patterned glass. In 2024, however, Şişecam decided to increase the capacity of the patterned glass from 600 to 800 tons/day and was required by the Ministry to update its EIA while the construction was ongoing. Excavation works had been completed, and civil works were ongoing during the IFC visit.

Identified Applicable Performance Standards

While all Performance Standards are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards.

PS1-Assessment and Management of Environmental and Social Risks and Impacts

SiseCamExpansion (51857)

PS2- Labor and working conditions
PS3-Resource Efficiency and Pollution Prevention
PS4-Community Health, Safety and Security
PS5-Land Acquisition and Involuntary Resettlement

Environmental & Social Categorization and Rationale

The project is a Category B according to IFC's Environment and Social Sustainability Policy, with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures, as described in the following sections.

Key E&S issues and risks associated with the project include (i) E&S management and monitoring systems and organizational capacity to assess and manage E&S impacts from its operation and construction works for the project; (ii) management of labor and working conditions and occupational health and safety (OHS); (iii) workers grievance mechanism & contractors' management, nondiscrimination, emergency planning with the focus on plants capacity expansion and modernization construction works; (iv) management of air emissions, noise, waste, wastewater, hazardous material; (v) process safety risk assessment and management; and (vi) stakeholders' engagement, including grievance mechanism.

Environmental & Social Mitigation Measures

(Observations that are not to be disclosed must be recorded in ESG360)

IFC's appraisal considered the environmental and social management planning process and documentation for the Project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in the paragraphs that follow and (if applicable) in an agreed Environmental and Social Action Plan (ESAP). Through implementation of these measures, the Project is expected to be designed and operated in accordance with Performance Standards objectives.

Applicable PSs summary

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social Policies: Şişecam has corporate Sustainability Policies (<https://sustainability.Şişecam.com>), including Environmental and Energy Policies, Waste and Circular Economy Policies, OHS Policies, Human Resource Policies, Diversity and Inclusion Principles, a Code of Ethics, and a Code of Conduct, that are applied across its operations. The company's sustainability strategy is generally aligned with IFC PS1.

E&S Management System and Programs. The corporate-level environmental and social management system (ESMS) complies with Turkish legal and regulatory requirements and aligns with the International Standards Organization (ISO) framework. The ESMS certification is established at the plant level. The TR3 plant is certified following the requirements of ISO 14001 for Environmental Management, ISO 9001 for Quality Management, ISO 45001 for Occupational Health and Safety, and ISO 50001 for Energy Management.

The TR9 construction management plans, including the OHS Management Plan, Emergency Response Plan (ERP), and Accommodation Management Plan, were prepared in line with national laws and regulations and Şişecam corporate policies requirements. The agreement with the Engineering, Procurement and Construction (EPC) contractors includes penalty provisions for E&S non-compliance. More specifically, audit findings not closed out on time are subjected to penalties.

Şişecam will prepare a Contractor Management Plan (CMP) in line with IFC's good practice note on Managing Contractors' Environmental and Social Performance and IFC Performance Standards (PS) prior to starting any construction works of TR3. The client will enhance its Construction Environmental and Social Management Plan (CESMP) for the project including site-specific E&S risk assessment, mitigation and monitoring plans related to excavated spoil management, waste and wastewater management, air and traffic management, and alignment with national law, regulations and standards, IFC PSs and Good International Industry Practices (GIIP), such as WBG General EHS guidelines (2007) and WBG EHS Guidelines for Glass

SiseCamExpansion (51857)
Manufacturing (ESAP #1).

Subsequently, before commissioning of the TR9 plant, Şişecam will develop the Operations E&S Management Plan (O-ESMP) that will comply with both national regulatory requirements and IFC's PS and allow to monitor and report on E&S performance against WBG General EHS Guidelines and the EHS Guidelines for Glass Manufacturing. Şişecam will also enhance the O-ESMP of the existing glass plants in Türkiye to comply with WBG General EHS Guidelines and the EHS Guidelines for Glass Manufacturing (ESAP #2).

Identification of risks and impacts: Şişecam conducts an environmental impact assessment (EIA) for each Türkiye glass manufacturing plant, per the regulatory requirements for any new glass manufacturing facilities in Türkiye. In 2022, the Ministry approved the EIA for the TR9 capacity of 1200 tons/day of flat glass and 600 tons/day of patterned glass. Şişecam, however, decided to increase the capacity of the patterned glass from 600 to 800 tons/day and has been required by the Ministry to update the TR9 EIA. The local EIA has assessed impacts for the construction and operations phases and has a general ESMP. Şişecam will update the TR9 Environmental and Social Management Plans (ESMPs) as part of ESAP #1 and ESAP #2.

Şişecam used AERMOD for its air quality dispersion modelling in the local EIA. The air modelling results are in compliance with national regulatory standards. Şişecam will conduct supplementary baseline assessment for ambient air and noise in the nearest receptors to TR3 and TR9 (ESAP #3). SiseCam will also prepare PS compliant supplementary EIA for TR3 and TR 9 to take into account changes in operations with the (i.e., selective catalytic reactor (SCR)) installation. It will include updating the existing facilities' air emission modeling in line with WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007) (ESAP #3). It will also develop an air emission plan roadmap (ESAP #4), including adoption of primary measures which will include operational changes to reduce NOx generation (ESAP #5) and secondary measures, including the SCR to treat the generated air emissions (ESAP #6), for the facilities to comply with WBG EHS Guidelines for Glass Manufacturing.

Organizational Capacity and Competency, Monitoring and Review: Şişecam's corporate EHS, OHS, Sustainability, and HR teams monitor the implementation of Şişecam's sustainable practices and oversee the consistency of implementation across Şişecam's operations and compliance with national standards and requirements. Each plant has its environmental and OHS teams, which report to the plant manager. In addition, Şişecam has assigned Regional Environmental and OHS teams to assist the plant-level teams on environmental risk and OHS management, performance measurement and monitoring, continuous improvement of business processes.

Şişecam engaged a third-party project management (PM) team that oversees the project execution, including the environmental and OHS performance of the two main EPC contractors and their subcontractors in TR9. The PM team has health, safety, and environment (HSE) specialists, who conduct weekly site walkthroughs and prepare an HSE audit report. The report is shared with the EPC contractors to address the findings. The main EPC contractors have their own HSE specialists and first aid responders on site at a ratio of one HSE expert for every 25 workers which was more stringent than the prescribed number required under the Turkish regulation for construction activities.¹ Şişecam has its project construction manager at the site, while the TR3 environmental engineers and OHS specialists support the project on a need basis.

E&S Monitoring and reporting. Şişecam operating plant has a specific monitoring and reporting program to review the compliance of their facilities' operations with national law and standards. Internal and external audits are periodically undertaken at each plant. The corporate level teams track the monitoring results, key audits findings, and management of non-compliances at plant level, and report the key issues to the corporate management every month. The annual corporate Sustainability Reports are published on Şişecam website, with the latest report of 2023 already available: (<https://www.Şişecam.com.tr/sites/catalogs/tr/Documents/sustainability/Şişecam-2023-Sustainability-Report.pdf>). Existing glass manufacturing facilities in Türkiye and TR9 will enhance their environmental and OHS management and monitoring procedures to comply with the General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007). This will include the sampling campaign for stacks emission and ambient air quality monitoring for TR9 (ESAP #7).

Emergency Preparedness and Response (ERP): Şişecam has an ERP for each of its plants, including those under construction, such as the TR9 plant. The ERP identifies the protocols and scenarios for handling emergencies related to fire, earthquakes, storms, and flooding caused by climate change. It also identifies the contact details and responsibilities of the designated emergency managers and emergency response team

SiseCamExpansion (51857)

for firefighting, rescue, and first aid, who are trained to assess each situation and respond accordingly.

The TR3 plant production, raw material storage, ancillary facilities, and the TR9 construction site areas, are provided with fire protection equipment. Signs for evacuation routes are placed all over the plant, and emergency response drills are carried out at least once per year with the local Fire Department. Şişecam prepares an emergency drill exercise report that analyzes the effectiveness of the response plan for the plant. Şişecam also partners with a Search and Rescue Association Training and Research Institute to provide periodic training to its emergency response team and managers to continue building their capacities.

Şişecam engaged a third-party expert who prepared the Life and Fire Safety (LFS) design of the TR9 plant, following the National Fire Protection Association (NFPA) specifications. Extreme heat conditions and seismic design have also been factored into the design of the plant and equipment.

The client's existing plants will conduct at a minimum annual LFS verification activity such as inspection and certification of fire detection and suppression system in the plants and various emergency drills. Şişecam will engage an external OHS expert to conduct an OHS audit, including an LFS review of the existing TR3 plant and TR9 that are designed in accordance with the local regulations and NFPA (ESAP #8).

PS 2 - Labor and Working Conditions

Şişecam have approximately 25,000 employees in 2023. By the first half of 2024, TR3 has 609 direct employees and 153 contractor employees, with 10% of employees being female for both categories. TR9, on the other hand, has 1575 contracted workers and 61 direct workers of Şişecam, with 4% female employees for both categories during the construction phase. According to the EIA Report, a total of 608 workers will be employed during the operation phase of the plant.

Human Resources Policies and Procedures, Working Conditions and Terms of Employment, Workers' Organization: Şişecam's HR policy and procedures were developed in line with national law. The Şişecam Group Code of Conduct and Supply Chain Policy are incorporated into Şişecam's employees' and suppliers' contracts. These policies include non-discrimination provisions and prohibiting child labor and forced labor. All Şişecam employees are direct workers; the company only engages temporary workers as relievers when direct employers are on annual leave to ensure that the plants maintain production output. The Şişecam Business Ethics Regulation, which subcontractor employees are also subject to, sets out the disciplinary rules and sanctions against all kinds of physical, sexual, and psychological harassment and violence under the title Prevention of Harassment and Bullying and generally throughout the document.

The TR9 Contractor Agreement signed for all main construction contractors and subcontractors includes conditions of compliance with regulatory requirements and on working conditions and OHS protocols and Şişecam applicable policies.

Non-discrimination and Equal Opportunity: The Şişecam Human Rights Policy and the Şişecam Diversity and Inclusion Principles ensure that equal opportunities are provided at all levels, regardless of race, nationality, gender, sexual orientation, social or personal status, health, marital status, religion, personal beliefs, disability, age, or other characteristics. These policies also define non-discrimination in their procedures. According to the Şişecam 2023 Sustainability Report performance indicators, there were no reported cases of discrimination during the year.

Workers' Organization. All blue-collar workers of Şişecam are members of Kristal-İş Union. Union representatives actively participate in management processes regarding workers' rights, OHS management procedures, working conditions, and training at Şişecam facilities and represent workers, including on matters such as occupational health and safety, workers' rights, working conditions, and training requirements.

Grievance Mechanism: Şişecam receives grievances via the Ethics Hotline (ethicshotline.Şişecam.com) website and by telephone available in 14 languages as it's the same platform used across Şişecam's global operations. Any employees, contractors, or stakeholders can access the grievance mechanism, anonymously report workplace or plant operations incidents, and track the report's status related to the lodged concern. It was reported in the latest Sustainability report that 33 grievances lodged to the Ethics Hotline in 2023, were all closed out.

Şişecam has established venues where workers can file their grievances at the plant level. In TR3 and TR9, there are complaint boxes that workers can use to indicate grievances. Additionally, in TR9, workers are

SiseCamExpansion (51857)

informed that they can raise their concerns during the weekly OHS meetings. Şişecam will develop a plant level internal mechanism (GM) procedure for TR9 in line with PS2. Similarly, the GM for the client's other existing glass plants in Türkiye will also be updated. All plant-level GM will include a dedicated mechanisms for receiving and responding to gender-based violence and harassment (GBVH) related grievances and ensuring a survivor-centered approach. This should incorporate a trained GBVH focal point to receive complaints, multiple options for reporting (in person, phone, via email, anonymously), the possibility to choose who to report cases to, disciplinary measures, and referral pathways for survivors. All cases and the identity of the concerned person will be handled confidentially. The plants will maintain a GM tracker, and mechanism to report back to complainants in a timely manner on resolution of the complaint/issue (ESAP#9).

Gender/GBVH: Şişecam signed the Women's Empowerment Principles established by the United Nations, aiming to empower women to participate in every aspect of society and the economy in all industries and levels. Şişecam has female employees in supervisory positions, such as engineers and OHS personnel at the construction site. Şişecam aims to increase female employment from 23.6% by the end of 2023 to 25% by 2030.

For both plants, female workers are provided with transportation services in the morning and afternoon. The service takes the routes in consultation with the female employees, considering safe unloading/loading stops and the closest points to their homes.

Şişecam has undertaken measures to prioritize women in their workforce and in principle have overarching harassment policy built into the code of conduct. As per ESAP #10, Şişecam will adopt an Anti-Sexual Harassment Policy, and will assign a trained HR team to lead the Sexual Exploitation, Abuse and Harassment (SEAH) and GBVH awareness for all workers and contractors. The assigned HR staff will undertake training and later prepare the same training program for all workers and contractors, managers, human resources and/or other relevant persons (GBVH focal point). The trained HR team will also be the GBVH focal point specified in ESAP #9.

Workers Engaged by Third Parties: Contractors are mainly engaged in TR9 construction and security, housekeeping, and maintenance in TR3. Şişecam's purchasing team ensures that the contractor's agreement includes the OHS specification, which provides for compliance with the national laws and Şişecam's policies and undertaking mandatory OHS training of the assigned team on site. Contractor performances are evaluated following the Supplier Management procedure. The subcontractor GM has not been fully functional. Some female workers in TR9 raised concerns about the availability of toilets at the construction area, which have remained pending. The internal GM procedures in ESAP #9 will be extended to all contractors and subcontractors.

Occupational Health and Safety: Şişecam's OHS management system, which includes relevant policies, programs, and procedures, is aligned with the framework of ISO 45001. The company conducts risk assessments for all its activities, involving relevant workers, OHS experts, managers, and resident medical doctors. All employees receive safety training during onboarding and annually following OHS regulatory requirements and additional specific safety training for workers with high-risk activities based on the risk assessment. The OHS team records work-related incidents online and conducts thorough investigations. Şişecam performs a root cause analysis to establish corrective actions and prevent incidents' recurrence.

In 2023, Şişecam implemented a Behavior-Focused Inspection System to analyze safety gaps and behavior-focused risks across Türkiye Şişecam plants. The company has developed an innovative application allowing workers to easily report unsafe behaviors. Additionally, technologies for vehicle tracking, area control, and ramp safety systems have been introduced to enhance safety practices within operations.

Şişecam aims to achieve a zero-incident rate for accidents and injuries, including for their suppliers, by 2050. To support this goal, the company has established key performance indicators where plants accident frequency rates are included in annual management performance targets. While there have been some improvements in the overall OHS processes and program, the Lost Time Injury Frequency Rate (LTIFR) for direct workers and contractors remains above the sector benchmark level of 5.00 for glass manufacturing.

Noise, vibration, heat and dust exposure are measured as part of the workplace OHS monitoring conducted on an annual basis. Recent monitoring results have shown that some areas involved in process and raw material preparation exceed the regulatory standards for these parameters. Şişecam has developed protocol for workplace risk management related to silica and heat exposure. At the plant, there are multicyclones and air ventilation in the process area, and workers are provided training and personal protective equipment

SiseCamExpansion (51857)

(PPE) to all on-site workers to reduce risk exposure. Specifically on silica risk, Şişecam's OHS procedures indicate that workers are provided with respiratory masks in accordance with established international industry standards (e.g., OSHA, EN 149, EN 13034). Additionally, all workers undergo annual health examinations, which include screenings for potential respiratory diseases. Enforcement of PPE usage needs to be strengthened generally across the site.

As per ESAP #8, Şişecam, will engage an external OHS expert to conduct an OHS audit. It will also integrate a GBVH lens, and develop and implement a time-based corrective action plan with clear step change programs, acceptable to IFC, to improve the recurrence of top incidents at Şişecam operating plant, reduce the LTIFR, improve the awareness program and monitoring for workplace hazards and risks, and assist the company improve a medium and long-term plan to reach its zero incident target, including enforcement of PPE usage.

PS 3 - Resource Efficiency and Pollution Prevention

Resource Efficiency: The TR3 plant uses natural gas for its furnaces, which will also be the case for the TR9 plant. The annual gas consumption for TR3 is approximately 114,660 m³, and energy consumption from the grid is 94,000 MWh. TR9 currently consumes 178 MWh per year during construction. Şişecam enhances resource efficiency by utilizing internal cullet as raw material from its production process. Additionally, raw material dust collected by the multicyclones in the production areas is also reused for production.

A waste heat power plant capable of producing 5.5 MWh has been installed at TR3. This plant converts 19% of the energy from the furnace flue gas into electricity for internal consumption. After the cold repair, TR3 is expected to increase its flat glass capacity to 750 tons/day, and natural gas and electricity consumption will be reduced by 28 percent and 16 percent per ton of glass, respectively.

GHG Emissions: Şişecam monitors its production-based emissions (Scope 1 and 2) and utilizes this data for internal evaluations and reporting. The calculated Scope 1 and 2 emissions for TR3 is approximately 382,000 tons of CO₂ equivalent (CO₂e) in 2023. Şişecam aims to install 53 MW of renewable energy capacity by 2030. As of 2023, Şişecam has successfully installed 10 MW of capacity in Türkiye, which includes 6.2 MW from the TR3 plant, contributing to the plant's reduction of 8,200 tons CO₂e. A waste heat recovery facility is installed at TR3 which further reduce the plant's annual emission by 34,000 tons CO₂e. The estimated Scope 1 and 2 emissions for TR9 during operations is 438,000 tons of CO₂e.

Water and Wastewater: The Mersin Organized Industrial Zone (OIZ) supplies raw water for the TR3 plant. The water utilized during operations are from the cooling water and glass cleaning. The cooling water system operates on a closed-loop basis, allowing for water recycling. The effluent generated from the glass washing process amounts to approximately 580 m³ per day which is discharged into the Mersin OIZ wastewater treatment plant (WWTP). Effluent quality is monitored before discharge and recent results have shown compliance with national effluent standards.

The Tarsus OIZ also provides raw water for the TR9 plant, which consumes about 198 m³ per day during construction. The TR9 construction site has separate sedimentation ponds for the cement-mixing facility and the domestic wastewater treatment facility. The cement-mixing facility produces approximately 4,700 m³ of sludge per month, collected by tanker and disposed of by the cement contractor at their main facility in Mersin. Şişecam cement contractor will improve the effluent collection point and connection from the cement-mixing to the sedimentation pond. This will be included in the CESMP as part of ESAP #1.

The Tarsus OIZ will supply the raw water requirement for the TR9 operations, which is approximately 2600 m³ per day. The effluent from glass washing at the TR9 site will be reused in sand preparation, and the effluent from the sand preparation will be pre-treated in on-site biological treatment before discharging to the Tarsus OIZ wastewater treatment facility. The wastewater management plan will be included in the O-ESMP as part of ESAP #2.

Air emissions: Şişecam monitors and manages the air emissions from TR3 per the local environmental permit conditions. The main source of emissions is the three regenerative furnaces, two of which are 52MW capacity each and 11MW capacity for the patterned glass all use natural gas for their operations. The TR3 emissions monitoring includes nitrogen oxide, conducted every two years per local requirements. The plant uses low NO_x burner to reduce NO₂ emissions. The TR3 plant has a continuous emissions monitoring system (CEMS) which can be accessed by the Ministry on a real-time basis. TR3 plant manages the dust emissions from the main raw materials by having a separate storage facility from the operational areas, and

SiseCamExpansion (51857)

delivered raw materials are transferred to silos through large pipelines. Afterwards, the raw materials are transferred to the process area via enclosed conveyors.

The latest TR3 air emission results and TR9 air dispersion modeling results are compliant with the regulatory air emissions standards. As per ESAP#3, Şişecam will engage an air expert to update the TR3 and TR9 air model in line with the WBG General EHS Guidelines and implement primary measures and secondary measures (i.e., selective catalytic reactor) to comply with WBG EHS Guidelines for Glass Manufacturing. As per ESAP #7, Şişecam will prepare a stacks emissions and ambient air quality monitoring plan for TR9, TR3 and the existing glass plant operations in Türkiye, and implement the air emission plan roadmap, accordingly (ESAP #4). The primary measures such as optimization of design of the glass melting area, reduced air-fuel ratio and prevention of air leakages into the furnace will be implemented at the start of operations of both the TR9 and after the TR3 cold repair (ESAP #5). The secondary measures, including the SCR installation, will progressively be installed in the two plants (ESAP #6).

Waste Management: Şişecam has submitted its waste management plan to the Ministry in accordance with the local regulations. The plan outlines the estimated waste for the next two years of operations and the management strategies for waste storage and disposal. The process wastes include refractory wastes, regenerator wastes, pyrolytic wastes. Hazardous waste facility in TR3 plant has several compartments and equipped with collection basin for storage of oil wastes and portable fire protection equipment are stationed in the area. An accredited third-party company periodically collects the plants waste and disposed to a licensed waste disposal facility. The impact and management of the hazardous waste that may be generated from the implementation of the secondary measures (e.g., SCR) will be included in the supplementary EIA ESAP #3.

PS 4 - Community Health, Safety and Security

Both TR3 and TR9 facilities are located in OIZ and at approximately one and two and a half kilometer from the nearest receptors, respectively. The traffic count averages 250 vehicles per day including the transport of raw materials, such as sand, dolomite, soda ash, limestone, exportation of the products, and workers transportation. Transport services are required to comply with national laws, OHS requirements, and obligations as per Şişecam policies and procedures. The transport services are responsible for any accidents or violations of rules. No accident or incident involving community members has occurred within the past three years. Şişecam will develop a corporate community health and safety (CHS) framework that will be used as guidance to review and identify community risks for all existing glass plants in Türkiye, including traffic accident risks, driver and worker interaction with communities, pollution, and health and safety exposure. SiseCam will prepare a work plan schedule to implement the CHS framework across all existing facilities within the next twelve months after the CHS framework approval (ESAP #11).

To supplement this framework, Şişecam will also update its contract for all logistic service providers to incorporate OHS monitoring and reporting of its drivers and logistic operators and include the SEAH and GBVH training requirement (ESAP #12).

Şişecam employs licensed and unarmed security personnel at all facilities contracted by a private company. They are trained and certified according to local regulatory requirements. The facilities are equipped with CCTV cameras. Security personnel also receive training that provides the basic conditions for obtaining the necessary security certificates and OHS training. Şişecam will expand the training plan of all its contractors, subcontractors, third-party agencies, to include SEAH/GBVH awareness and management (ESAP #13).

PS5: Land Acquisition and Resettlement

The TR9 plant is located within the Tarsus OIZ with an area of 878,648 square meters. The Tarsus OIZ was established within the boundaries of Sağlık and Kurbanlı neighborhoods in Tarsus District and was registered under the Ministry of Science, Industry, and Technology (MSIT) of the Republic of Türkiye in November 2017. As per the Türkiye's law, newly formed OIZs must start expropriation procedures within six months of their establishment. With the approval of MSIT, expropriation of land parcels was carried out by the Mersin Governorship in accordance with Expropriation Law No. 2942. Negotiations were initiated with the landowners and urgent expropriation information was provided for the public benefit. The expropriation expert completed the evaluation of all land in 2020, and corresponding expropriation fees were provided to landowners. As per the expert evaluation, there were no housing/structures, therefore no physical displacement, crops were either compensated for or harvested prior to expropriation.

After the completion of the expropriation process, OIZ published to investors the availability of land allocation

SiseCamExpansion (51857)

within the Tarsus industrial zone area (<https://www.tarsusosb.org.tr/wp-content/uploads/2024/05/TARSUS-ORGANIZE-SANAYI-BOLGESI-ARSA-TAHSISLERI-ILANI-2-Aralik.pdf>)^{HYPERLINK} "https://www.tarsusosb.org.tr/wp-content/uploads/2024/05/TARSUS-ORGANIZE-SANAYI-BOLGESI-ARSA-TAHSISLERI-ILANI-2-Aralik.pdf"). Şişecam applied through that process and was awarded 53 land parcels from the original cadastral mapping.

While the expropriation process was officially completed, landowners under Article 10 of the Expropriation Law have the right to object and file a case in court in relation to the land valuation rate. In 2021, a second valuation assessment was carried out by the expropriation expert for 11 of the land parcels who appealed the valuation rates, which are located within the land area for Şişecam. Mersin Governorship proposed additional payments to the 11 landowners considering the rising inflation rate. However, court cases are still pending due to inheritance-related issues. These proceedings concern the formal registration of land titles under the names of legal heirs, after which the site will be consolidated under a single parcel. OIZ is monitoring this progress and Şişecam will also monitor the pending court cases.

Further information from the community to determine if there were any livelihood impacts from the OIZ development, was sought as part of the appraisal. The information gathered indicated that the area was historically used for low-yield dry farming, primarily wheat, barley, sunflower, citrus, and olive cultivation as a supplementary income. Following the expropriation notifications issued in 2020 to 2021, agricultural activities on the project site were voluntarily discontinued. Community members considered that continued farming was economically unviable due to the land's poor fertility and limited productivity. The land was not actively cultivated, and no income loss was reported at the time of construction.

The Farmer Registration System (ÇKS) records were used to identify and verify eligible land users for compensation during the land acquisition process. Although in certain cases the ÇKS records were held in the name of a single family member, agricultural activities were often carried out collectively by household members, such as adult children or spouses.

Furthermore, no grievances or complaints were submitted by individuals claiming unrecognized land use or loss of livelihood. The community leader explicitly stated that any such concerns would have been communicated to him, but no such cases occurred. Based on site visits, document review, and community consultation, no residual income impacts have been identified.

Stakeholder Engagement

Şişecam's Sustainability Strategies include initiatives to empower its stakeholders, which includes its employees, universities, shareholders, suppliers, civil society organizations, non-governmental organizations, media Şişecam continuously collaborate with its stakeholders in line with the UN Sustainable Development Goals. It effectively uses stakeholder feedback to improve its processes, operations and activities. Stakeholders may report an incident or concern through the ethics hotline or the phone numbers on the website (<https://sustainability.Şişecam.com/en/sustainability-from-a-to-z/corporate-governance/ethics-hotline>).

The community leader received some concerns from farmers regarding construction dust impacts which had not been addressed. These issues highlight the need to strengthen the Company's external grievance mechanism (GM). Şişecam will develop an external GM at the plant level where community members can raise their concerns related to the environment, health and safety, and social impacts of the Project, including its contractors/subcontractors. Şişecam shall record and respond to these complaints and investigate and evaluate claims through the external GM and in line with IFC PSs. It will also be the channel which communities can use to raise concerns about the OIZ land acquisition process, such as in the case of TR9. The GM will include a dedicated mechanism for receiving and responding to GBVH promptly. SiseCam will disseminate the external GM to all stakeholders. SiseCam shall follow the PS requirements in managing the external grievances received prior to the end of construction (ESAP #14).

Broad Community Support

Not Applicable

BCS Comment :

Local Access of Project Documentation

Environmental & Social Action Plan (ESAP)

Is there an ESAP to be disclosed for this project?

Yes

Mitigation Measures / Environmental & Social Action Plan (ESAP)

SNo	Description	Anticipated Completion Date
1	Implement primary measures to reduce NOX emissions for TR9 which will include: (i) Optimize Design of the Melting Area; (ii) Reduced air-fuel ratio and (iii) prevention of air leakages into the furnace.	11/30/2025
2	Secondary measures (i.e., SCR) procured for and TR 9	3/31/2030
3	Secondary measures (i.e., SCR) procured for TR 3	3/31/2026
4	Implement primary measures to reduce NOX emissions for TR3 which will include: (i) Optimize Design of the Melting Area; (ii) Reduced air-fuel ratio and (iii) prevention of air leakages into the furnace	1/31/2027
5	Secondary measures (i.e. SCR) installed for TR 3 and for both flat and solar lines in the fifth year of operations of TR 9 which are expected to coincide with the hot repair schedule.	3/31/2030
6	Secondary measures (i.e. SCR) installed for TR 3 and for both flat and solar lines in the fifth year of operations of TR 9 which are expected to coincide with the hot repair schedule.	12/31/2027
7	Secondary measures (i.e. SCR) installed for TR 3 and for both flat and solar lines in the fifth year of operations of TR 9 which are expected to coincide with the hot repair schedule.	10/31/2030
8	Sisecam will develop a corporate community health and safety framework to guide the review and identification of community risks at plants supported by IFC. The framework shall address risks such as traffic accident, interaction between drivers, workers, and communities, pollution and health and safety exposures. Sisecam will prepare a schedule when the framework will be implemented across all existing facilities	1/31/2026
9	Sisecam will develop a corporate community health and safety framework to guide the review and identification of community risks at plants supported by IFC. The framework shall address risks such as traffic accident, interaction between drivers, workers, and communities, pollution and health and safety exposures. Sisecam will prepare a schedule when the framework will be implemented across all existing facilities	2/28/2026
10	Sisecam will develop a corporate community health and safety framework to guide the review and identification of community risks at plants supported by IFC. The framework shall address risks such as traffic accident, interaction between drivers, workers, and communities, pollution and health and safety exposures. Sisecam will prepare a schedule when the framework will be implemented across all existing facilities	7/31/2026
11	Sisecam will expand the training plan of all its contractors, subcontractors, third-party agencies, to include human rights, SEAH / GBVH awareness, and management	2/28/2026
12	Sisecam will update its contract for all logistic service to incorporate OHS monitoring and reporting and , SEAH and GBVH training requirement	6/30/2026

SiseCamExpansion (51857)

13	he project will enhance its Construction Environmental and Social Management Plan (CESMP) for the project, including site-specific E&S risk assessment, mitigation and monitoring plans align with , IFC PSs and Good International Industry Practices (GIIP), such as WBG General EHS guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing.	2/28/2026
14	Sisecam will prepare a Contractor Management Plan (CMP) in line with IFC's good practice note on Managing Contractors' Environmental and Social Performance and IFC Performance Standards that will be applied to the project's new contracts, including the TR3 cold repair.	12/31/2025
15	Sisecam will develop the TR9 Operations Phase Environmental and Social Management Plan (O-ESMP) and existing glass facilities in Turkiye will enhance their respective O-ESMPs that will comply with IFC's PS and allow the monitoring and reporting E&S performance in accordance with WBG General EHS Guidelines and the EHS Guidelines for Glass Manufacturing.	4/30/2026
16	Sisecam will develop the TR9 Operations Phase Environmental and Social Management Plan (O-ESMP) and existing glass facilities in Turkiye will enhance their respective O-ESMPs that will comply with IFC's PS and allow the monitoring and reporting E&S performance in accordance with WBG General EHS Guidelines and the EHS Guidelines for Glass Manufacturing.	10/31/2025
17	The project will enhance its Construction Environmental and Social Management Plan (CESMP) for the project, including site-specific E&S risk assessment, mitigation and monitoring plans align with , IFC PSs and Good International Industry Practices (GIIP), such as WBG General EHS guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing.	1/31/2026
18	Sisecam will adopt an Anti-Sexual Harassment Policy and assign a trained HR team to lead the SEAH and GBVH awareness for all workers and contractors. The assigned HR staff will undertake training and later prepare the same training program for all workers and contractors, and for managers, human resources and/or other relevant persons (GBVH focal point) on how to respond to and investigate allegations of SEAH/GBVH in the workplace and by/toward community members. The trained HR team will also be the GBVH focal point specified in ESAP #9.	12/31/2025
19	Sisecam will adopt an Anti-Sexual Harassment Policy and assign a trained HR team to lead the SEAH and GBVH awareness for all workers and contractors. The assigned HR staff will undertake training and later prepare the same training program for all workers and contractors, and for managers, human resources and/or other relevant persons (GBVH focal point) on how to respond to and investigate allegations of SEAH/GBVH in the workplace and by/toward community members. The trained HR team will also be the GBVH focal point specified in ESAP #9.	2/28/2026
20	Sisecam will adopt an Anti-Sexual Harassment Policy and assign a trained HR team to lead the SEAH and GBVH awareness for all workers and contractors. The assigned HR staff will undertake training and later prepare the same training program for all workers and contractors, and for managers, human resources and/or other relevant persons (GBVH focal point) on how to respond to and investigate allegations of SEAH/GBVH in the workplace and by/toward community members. The trained HR team will also be the GBVH focal point specified in ESAP #9.	4/30/2026
21	Sisecam will develop/enhance a plant level workers grievance mechanism (GM) procedure in line with PS2 and a survivor-centered approach. The GM will include a dedicated mechanisms for receiving and responding to gender-based violence and harassment (GBVH) related grievances from workers, contractors and subcontractors. This should incorporate a trained GBVH focal point to receive complaints, multiple options for reporting (in person, phone, via email, anonymously), the possibility to choose who to report cases to, disciplinary measures, and referral pathways for survivors. The plants will maintain a GM registry, and mechanism to report back to complainants in a timely manner on resolution of the complaint/issue.	4/30/2026

SiseCamExpansion (51857)

22	<p>Sisecam will develop/enhance a plant level workers grievance mechanism (GM) procedure in line with PS2 and a survivor-centered approach. The GM will include a dedicated mechanisms for receiving and responding to gender-based violence and harassment (GBVH) related grievances from workers, contractors and subcontractors. This should incorporate a trained GBVH focal point to receive complaints, multiple options for reporting (in person, phone, via email, anonymously), the possibility to choose who to report cases to, disciplinary measures, and referral pathways for survivors.</p> <p>The plants will maintain a GM registry, and mechanism to report back to complainants in a timely manner on resolution of the complaint/issue.</p>	7/31/2026
23	<p>3a. Sisecam will undertake supplementary baseline for ambient air and noise in the nearest receptors to TR9 to ensure compliance with the WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007). Sisecam will engage an air modelling expert to update the modelling assumptions, rerun the model and evaluate the model results evaluated in line with WBG General EHS Guidelines (2007). Sisecam will prepare an air emission abatement plan, including use of secondary measures (e.g., selective catalytic reactor).</p>	10/31/2025
24	<p>3a. Sisecam will undertake supplementary baseline for ambient air and noise in the nearest receptors to TR3 to ensure compliance with the WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007). Sisecam will engage an air modelling expert to update the modelling assumptions, rerun the model and evaluate the model results evaluated in line with WBG General EHS Guidelines (2007). Sisecam will prepare an air emission abatement plan, including use of secondary measures (e.g., selective catalytic reactor).</p>	2/28/2026
25	<p>3a. Sisecam will undertake supplementary baseline for ambient air and noise in the nearest receptors to TR9 and TR3 to ensure compliance with the WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007). Sisecam will engage an air modelling expert to update the modelling assumptions, rerun the model and evaluate the model results evaluated in line with WBG General EHS Guidelines (2007). Sisecam will prepare an air emission abatement plan, including use of secondary measures (e.g., selective catalytic reactor).</p>	10/31/2025
26	<p>3b. Prepare Supplementary environmental impact assessment for TR3 and TR 9 to take into account changes in operations with the SCR installation. The EIAs will be prepared in line with IFC PS and WBG EHS Guidelines including: (a) air quality modelling studies (incorporating baseline AAQ results and predicting increment GLC at receptors) and analysing % contribution of emissions from TR3 stack to total AAQ values and (b) safety studies for hazardous materials (e.g., ammonia, urea) to be used for SCR operations</p>	3/31/2026
27	<p>3b. Prepare Supplementary environmental impact assessment for TR3 and TR 9 to take into account changes in operations with the SCR installation. The EIAs will be prepared in line with IFC PS and WBG EHS Guidelines including: (a) air quality modelling studies (incorporating baseline AAQ results and predicting increment GLC at receptors) and analysing % contribution of emissions from TR3 stack to total AAQ values and (b) safety studies for hazardous materials (e.g., ammonia, urea) to be used for SCR operations</p>	10/31/2028
28	<p>Sisecam will develop and agree on a roadmap for emission control with IFC for the project to comply with WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007)</p>	10/31/2025
29	<p>The existing glass plants (e.g., air emissions, ambient air quality) and OHS monitoring plans and procedures will be enhanced and benchmarked against WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007).</p>	11/30/2026

SiseCamExpansion (51857)

30	TR9's environmental (e.g., air emissions, ambient air quality) and OHS monitoring plans and procedures will be enhanced and benchmarked against WBG General EHS Guidelines (2007) and WBG EHS Guidelines for Glass Manufacturing (2007).	11/30/2025
31	Sisecam will engage an external OHS expert to conduct an OHS audit, including review of the (i) OHS programs and practices; (ii) OHS management (iii) emergency preparedness; (iv) life and fire safety (LFS) design compliance with local regulation and NFPA. The audit will integrate a GBVH lens, develop and implement a time-bound corrective action plan (CAP) with clear step change programs, acceptable to IFC.	4/30/2026
32	Sisecam will engage an external OHS expert to conduct an OHS audit, including review of the (i) OHS programs and practices; (ii) OHS management (iii) emergency preparedness; (iv) life and fire safety (LFS) design compliance with local regulation and NFPA. The audit will integrate a GBVH lens, develop and implement a time-bound corrective action plan (CAP) with clear step change programs, acceptable to IFC.	8/31/2026
33	Şişecam will develop a stakeholder engagement plan (SEP) and external grievance mechanism (GM) at the plant level where community members can raise their concerns related to the environment, health and safety, and social impacts of the Project, including its contractors/subcontractors. Şişecam shall investigate and evaluate claims through the external GM and record and respond to these complaints in line with IFC PSs and documenting all the steps. It will also be the channel which communities can use to raise concerns about the OIZ land acquisition process. The GM will include a dedicated mechanism for receiving and responding to GBVH promptly. Şişecam will disseminate the external GM to all stakeholders. Şişecam shall follow the PS requirements in managing the external grievances received prior to the end of construction	2/28/2026
34	Şişecam will develop a stakeholder engagement plan (SEP) and external grievance mechanism (GM) at the plant level where community members can raise their concerns related to the environment, health and safety, and social impacts of the Project, including its contractors/subcontractors. Şişecam shall investigate and evaluate claims through the external GM and record and respond to these complaints in line with IFC PSs and documenting all the steps. It will also be the channel which communities can use to raise concerns about the OIZ land acquisition process. The GM will include a dedicated mechanism for receiving and responding to GBVH promptly. Şişecam will disseminate the external GM to all stakeholders. Şişecam shall follow the PS requirements in managing the external grievances received prior to the end of construction	4/30/2026

Activity Log/Comments

Workflow Initiated by Melissa Moyano Manguiat (Draft Environmental and Social Review Summary) Oct 30, 2025 06:37 PM ET

Comments:

Cleared by Diana Makinson Baird (ESRO Clear) Oct 30, 2025 08:24 PM ET

Comments:

Approved by CESRO - please send us the final clean word versions of ESRS and ESAP for files and tracking purposes, thanks.

CRU Member Approved and Appraisal Disclosure Initiated by Ejura Phoebe Audu Nov 07, 2025 06:42 PM ET

Comments:

Client clearance received on 10/27/2025. Director's approval for delayed disclosure received.

Supporting Documents

S.No.	Document Details
-------	------------------