

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
PS1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1	<p>Preparation, implementation and publication of ESMS documents and policies (Environment, Social, OHS and Human Resources) in line with project-specific national and international standards.</p> <p>Preparation of an organizational chart that includes all contractors/subcontractors and suppliers. In addition, the appointment of appropriate persons for the duties and responsibilities specified in the ESMS documentation created in this organizational chart and the creation of job descriptions for these persons.</p>	<p>Preventing / minimizing environmental and social risks.</p> <p>Ensuring compliance with national legislation and international standards.</p> <p>Ensuring that contractors / subcontractors and suppliers implement the prepared ESMS and strictly monitor their compliance</p>	<p>National Legislation</p> <p>IFC PS1</p> <p>Best Practices</p>	<p>It is necessary to ensure that all Project employees (including contractors / subcontractors and suppliers) are involved in the implementation.</p> <p>Required resources: - Adequate financial and human resources for implementation</p>	June 2021	<p>Project specific ESMS documents and Policies (Environmental, Social, OHS and Human Resources)</p> <p>Organizational chart and job descriptions for contractors/subcontractors and suppliers and implementation of the Project ESMS in force.</p>	

1.2	<p>Full implementation and monitoring of the ESAP.</p> <p>Inclusion of KPIs in Environmental and Social Management Plans</p> <p>Preventing / minimizing environmental and social risks</p>	Ensuring compliance with local legislation and IFC PSs.	ESAP		During the operational phase, throughout the loan term	<p>Existing ES Management Plans with KPIs included.</p> <p>ESAP Monitoring Reports to be submitted annually during operation phase.</p>	
-----	--	---	------	--	--	---	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
	<p>Submit a yearly monitoring report during the operational phase of monitoring the ESAP.</p> <p>Providing regular information about complaints and noncompliances.</p>						
1.4	Preparation of "Environmental Risk Assessment Procedure / Environmental Aspects Assessment Analysis".	Ensuring compliance with local legislation and IFC PSs.	<p>National Legislation</p> <p>IFC PS1</p> <p>Best Practices</p>		June 2021	Environmental Risk Assessment Procedure / Environmental Aspects Assessment Analysis	
1.5	Preparation of Environment and HS Handbook.	Ensuring compliance with local legislation and IFC PSs.	<p>National Legislation</p> <p>IFC PS1</p> <p>Best Practices</p>		June 2021	Environment and HS Handbook	

1.6	<p>Permissions</p> <p>Obtaining EIA Exemption approval from the relevant Administration within the scope of the planned new investment.</p> <p>Domestic Solid Waste Collection Agreement” to be</p>	<p>Ensuring full compliance with national legislation and international standards</p> <p>Preventing / minimizing environmental and social risks</p>	<p>National Legislation</p> <p>IFC PS1</p> <p>Best Practices</p>		June 2021	<p>New investment EIA Exemption</p> <p>Domestic Solid Waste Collection Agreement</p> <p>Packaging Waste Agreement</p> <p>Medical Waste Disposal Agreement</p>	
-----	---	---	--	--	-----------	---	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
	<p>signed with Kemalpaşa Municipality.</p> <p>Renewal of the packaging waste contract.</p> <p>Making a contract with a licensed company for Medical Wastes.</p>						
1.7	<p>Conducting and regularly repeating the environmental emergency drill.</p>	<p>Ensuring full compliance with national legislation and international standards</p> <p>Preventing / minimizing environmental and social risks</p>	<p>National Legislation</p> <p>IFC PS1</p> <p>Best Practices</p>		June 2021	<p>Drill participation minutes and photos</p>	

1.8	Preparation and implementation of the Project-specific Environmental and Social Management Plan. Sharing the prepared ESMP with the contractor / subcontractor and suppliers.	Ensuring full compliance with national legislation and international standards Preventing / minimizing environmental and social risks	National Legislation IFC PS1 IFC PS2 IFC PS3 IFC PS6		June 2021	ESMP	
1.9	Preparation and implementation of internal grievance mechanism. (The Grievance Mechanism Procedure should be considered a living document and updated regularly and as needed.)	Directing and resolving the complaints, requests and suggestions about the project to the right people	IFC PS1		Preparation of Internal Grievance Mechanism Procedure: June 2021 Publication of the Current	Internal Grievance Mechanism procedure Website	

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
					External Grievance Mechanism Procedure on the Investor's website: June 2021		
PS2 Labor and Working Conditions							

2.1	<p>A Human Resources (HR) Policy covering and referring to XX's current policies and procedures, specific to the Project and in accordance with the IFC Performance Standard 2 (PS2) "Work and Working Conditions" should be prepared, shared with all employees, and should at least include the following:</p> <p>should include:</p> <ul style="list-style-type: none"> ➤ Grievance Mechanism ➤ Fair treatment, non-discrimination and equal opportunity ➤ Forced labor and child labor ➤ Communication with employees 	Please refer to Ref. No 1.1	
-----	---	-----------------------------	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
---------------	--------	--	---	---	----------	--	-----------

	<ul style="list-style-type: none"> ➤ Human rights ➤ Statement regarding Workers Employed by Third Parties ➤ XX's commitment to respect employees' right to collective bargaining and freedom of association <p>Preparing a Social Responsibility Policy covering child labor and forced labor and sharing it on the website.</p> <p>Preparation of a Social policy that expresses XX's determination not to discourage workers who want to join any union in the relevant procedure.</p> <p>Preparation of the Social Responsibility Policy, which includes the issues of NonDiscrimination and Equal Opportunity.</p>		
--	---	--	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
---------------	--------	--	---	---	----------	--	-----------

2.2	<p>Preparing an OHS Handbook that includes the following topics and clearly specifying the duties and responsibilities:</p> <ul style="list-style-type: none"> ➤ OHS Policy ➤ OHS in production ➤ medical checkups ➤ Incident / Accident Investigation Procedure Control procedure of subcontractors. 	Ensuring full compliance with national legislation and international standards.	<p>National Legislation</p> <p>IFC PS2</p> <p>ISO 14001</p> <p>ISO 45001</p>		June 2021	HS Handbook		
2.3	<p>Employment contracts are updated to include introductory training and procedures and policies to be followed.</p> <p>Adding the right of union to employment contracts.</p>	Ensuring full compliance with national legislation and international standards.	<p>National Legislation</p> <p>IFC PS2</p>		June 2021	Revised Employment Contract		
2.4	<p>Social issues should be included in Introductory Trainings under the ESMS and given to all Project employees, including contractor/subcontractor and supplier employees.</p> <p>Giving Job Specific Trainings to all personnel assigned within the scope of ESMS.</p>	<p>Ensuring environmental and social awareness of all Project personnel.</p> <p>Ensuring an effective ESMS implementation.</p>	IFC PS2		<p>The first half of 2021</p> <p>Refreshing once a year</p>	<p>Presentations of the given trainings</p> <p>Training records and minutes</p>		
2.5	Establishing an internal grievance mechanism for	Please refer to Ref. No 1.9						

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
	employees, identifying key performance indicators and targets and evaluating monitoring, defining mitigation methods						
2.5	Revise the Emergency Action Plan to include public health and safety and environmental emergencies.	Ensuring full compliance with national legislation and international standards.	IFC PS2		June 2021	Revised Emergency Action Plan	
2.6	Adding the ESMS of the subcontractor to the minimum required documents for subcontractor selection.	Ensuring full compliance with national legislation and international standards.	IFC PS2		June 2021	List of documents requested from Subcontractor	
PS3 Resource Efficiency and Pollution Prevention							
3.1	Revising the Industrial Waste Management Plan, including the planned new facility, and obtaining the relevant approval If necessary, revising the existing Environmental Permit and Wastewater Treatment Plant Project and obtaining approvals.	Minimizing environmental pollution caused by waste	IFC PS1 IFC PS 3		September 2021	Approved revised Industrial Waste Management Plan Revised Environmental Permit and License Certificate Revised Wastewater Treatment Plant Project Approval	

3.2	Renewal of the Capacity Report within the scope of the new investment	Ensuring full compliance with national legislation and international standards.	National Legislation		September 2021	Revised Capacity Report	
-----	---	---	----------------------	--	----------------	-------------------------	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
3.3.	Making agreements with licensed waste disposal companies.	Please refer to Ref. No 1.6					
3.4	Making periodic vehicle inspections and exhaust emission measurements.	Protection of air quality. Reducing greenhouse gas emissions.	National Legislation IFC PS3		During the construction and operation phases	Vehicle inspection records, measurement test reports Complaint database records	
3.5.	Energy, water etc. Identification, recording and evaluation of project-related consumptions such as the Project-specific Environmental and Social Management Plan. Identification, recording and evaluation of air emissions reduction methods, if required, in Environmental and Social Management and Monitoring Plans.	Efficient management of natural resource uses	National Legislation IFC PS3		During the construction and operation phases	Environmental and Social Management and Monitoring Plan	
PS4 Community Health, Safety and Security							

4.1	Preparation of a Project-based Community Health and Safety Plan, taking into account potential risks, control and monitoring activities.	Ensuring full compliance with national legislation and international standards. Protection of employee and public health.	National Legislation IFC PS4		Before starting assembly activities	Community Health and Safety Plan Revised Emergency Plan	
-----	--	--	-------------------------------------	--	-------------------------------------	--	--

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
	Include Community Health and Safety issues in the Emergency Plan.						
4.2	Inquiry of the HES Code and temperature measurements at the entrances to the facility (visitors and personnel).	Minimizing the possible health risks that may occur due to the pandemic	Ministry of Interior and Ministry of Health Covid19 guidelines and instructions		During the Covid-19 pandemic	HES Code and fever measurement records	
4.3	Obtaining security personnel certificates.	Ensuring compliance with national legislation	National Legislation		Throughout the life of the project	Security personnel certificates	
PS5 Land Acquisition and Involuntary Settlement							
5.1	Preparing the Internal Grievance Mechanism Procedure and publishing the External Grievance Mechanism Procedure on the website.	Please refer to Ref. No 1.9					
PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							

6.1	Ensuring the disposal of project-generated wastes in accordance with national and international legislation and standards.	Ensuring full compliance with national legislation and international standards. Conservation of biodiversity and living natural resources	National Legislation IFC PS6			Throughout the life of the project	Waste disposal records Licensed firm contracts Contractor / subcontractor evaluations	
PS7 Indigenous People								
7.1	N/A							
ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation	
PS8 Cultural Heritage								
8.1	N/A							