

**CHAPTER-10: ENVIRONMENTAL SOCIAL ACTION PLAN  
(ESAP)**

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>						
1.1	Environmental Social Assessment and Management System	Middle	2022 First quarter	Continually-Once a year	The management documents required within an Environmental Social Management Plan (ESMP) that is compatible with the needs of the production activities in the new facility should be developed and implemented by the responsible personnel or independent consultant to be appointed.	The fact that the ESMP documents have been prepared and started to be implemented
		Middle	2021 IV.quarter	Once-2022 First quarter	Face-to-face meetings before the relocation process of the facility should take into account the needs and recommendations of the employees and ensure their participation in the decisions.	Interview minutes, employee feedback forms, etc. records  Presence of applications developed for employee needs
1.2	Policy	Low	2021 Iv. Quarter	Once-2022 First quarter	Current environmental policy should be made a policy that defines the objectives and principles for managing environmental and social impacts.	The policy is prepared in target content and published on the website
1.3	Determination of Risks and Effects	Low	2021 Iv. Quarter	Twice-2022 I.-Third quarter	At the same time as the relocation activities to the new facility, needs and measures related to the management of environmental and social issues should be applied and monitored by the consultants who conduct risk assessments.	Applications of ESMP documents  Presence of risk assessment and corrective/preventive action forms
		Low	2021 Iv. Quarter	Once-2022 First quarter	Whether there are serious risk factors in the way of access to the facility should be evaluated by competent persons and if a serious risk or impact is detected, the relevant stakeholders should be discussed for the management of such risks and effects.	Traffic risk assessment report

		Low	2022 First quarter	Continually-Once a year	A Contractor Management Plan/Directive etc. should be prepared and defined how environmental and social risks and impacts	An Effective Contractor Management Plan/Directive
--	--	-----	--------------------	-------------------------	---	---

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
					(employees, traffic safety, occupational health and safety, waste, etc.) should be managed throughout the primary supply chain, and the applications defined in the plan/directive should be monitored to the extent possible.	Monitoring plan and monitoring/audit reports
1.5	Organizational Capacity and Competence	Low	2022 First quarter	Once-2022 II quarter	Given the environmental and social management processes of the new facility, contracts and job descriptions should be reviewed to see that the responsibilities and duties of both consultants and company personnel are clearly defined and updated to ensure effective management on all environmental and social issues when necessary.	Organization chart  Job description of key staff and job scope/contracts of consultants on environmental social issues
1.6	Emergency Preparedness and Response	High	2021 IV.quarter	Continually-Once a year	The Emergency Action Plan should be prepared for the new facility and updated as needed, considering the changing conditions.	Emergency Action Plan content  Applications at the property
		High	2022 First quarter	Continually-Once a year	The activities needed for enough employees to have the necessary training and equipment to prepare for emergencies (first aid, fire, etc.) should be carried out immediately after the start of production at the new facility.	Training, drills, etc.  Equipment and applications at the plant
1.7	Monitoring and Evaluation	Low	2021 IV.quarter	Continually-Once a year	The Environmental Social Management Plan should also include a monitoring program for each environmental social impact.	ESMP content  Monitoring reports

1.8	Stakeholder Participation	Low	2021 IV. quarter	Continually- Once a year	A document should be prepared to meet the basic stakeholder participation requirements, such as a Stakeholder Communication Procedure/Directive. In this document, the period of regular information and interviews with internal and external stakeholders should be defined and the mechanisms by which internal and external stakeholders can	An effective Stakeholder Communication Procedure/Directive  Publications and announcements  Feedback forms and minutes
-----	---------------------------	-----	------------------	--------------------------	--	--

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
					communicate their opinions and complaints should be defined. After the document is prepared, it should be shared with employees and important external stakeholders (suppliers, OIZ, etc.) and announced via the website.	
1.10	Information Sharing and Consultation	Low	2021 Iv. Quarter	Once- 2022 First quarter	The Company's Human Resources Officer should develop mechanisms (routine meetings, company newsletter, bulletin board, etc.) that facilitate and strengthen the processes of information sharing, consultation and employee access to information with employees during the relocation and subsequent process.	Interview minutes  Publications and announcements
1.11	Informed Consultation and Participation	Low	2021 Iv. Quarter	Continually- Once a year	Human Resources Officer should ensure that employees participate actively and efficiently in the information processes and methods should be developed to facilitate employees to communicate their opinions in writing and in privacy.	Apps and employee feedback

1.14	Complaint Mechanism for Affected Communities	Low	2021 Iv. Quarter	Continually-Once a year	<p>Within the Stakeholder Communication Procedure/Directive proposed in Article 1.8, ways of easily communicating the complaints of internal and external stakeholders should be defined clearly.</p> <p>Complaints from internal and external stakeholders should be recorded as defined in this document, must be answered and reported regularly to senior management.</p>	<p>Procedure/Content of the Directive</p> <p>Complaint records and process correspondence</p>
------	--	-----	------------------	-------------------------	---	---

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
<b>PS 2: Labor and Working Conditions</b>						
2.1	Human Resources Policies and Procedures	Low	2021 Iv. Quarter	Continually-Once a year	<p>A document should be prepared in accordance with PS2 requirements, including the company approach and defining basic employee rights, such as a Human Resources Policy and Personnel Regulation/Recruitment Procedure, etc.</p> <p>The policy should be published on the website and the document should be shared with all employees.</p>	<p>Policy and regulation documents</p> <p>Physical condition at the facility</p> <p>Publications and announcements</p> <p>Personnel personal files</p> <p>Complaint records</p>
2.2	Working Conditions and Duration	Low	Continuou s	Continually-Once a year	<p>In terms of working conditions, overtime and working times, legal legislation and PS2 requirements should be acted upon.</p>	<p>Personnel personal files</p> <p>Scoreboards and payrolls</p> <p>Complaint records</p>

		Low	2021 IV. Quarter	Continually-Once a year	In the event that regular accommodation is offered to employees at the new facility, compliance with PS2 requirements (IFC Worker Shelters: Processes and Standards Manual) should be followed and guidelines/procedures for controlling and monitoring housing services should be prepared.	Physical condition at the facility Complaint records
2.6	Complaint Mechanism	Low	2021 IV. quarter	Continually-Once a year	Within the Stakeholder Communication Procedure/Directive proposed in Article 1.8, the ways in which employees can easily communicate their complaints should be defined clearly.  Complaints from internal and external stakeholders should be recorded as defined in	Complaint mechanism Announcement and training records Complaint records

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
					this document, must be answered and reported regularly to senior management.	
2.9	Employee Health and Safety	High	2021 IV. quarter	Continually-Once a year	An Occupational Health and Safety Management Plan should be prepared, implemented and activities and employees inspected in accordance with the new facility conditions (including changing conditions such as transportation).	OHS Management Plan Education Records Audit, monitoring, and application records

2.11	Supply Chain	Low	2021 Iv. Quarter	Continually- Once a year	<p>Within the scope of the Contractor Management Plan/Directive to be prepared as specified in Article 1.3, child labour, forced labor, etc. must include the relevant PS2 requirements and the primary supply chain should be audited within this framework.</p> <p>Within the scope of the same plan/directive, reasonable third-party contractors should also be monitored.</p>	<p>Contractor Management Plan/Directive</p> <p>Training, auditing, monitoring, etc.</p>
------	--------------	-----	------------------------	-----------------------------	--	---

**PS 3: Resource Efficiency and Pollution Prevention**

3.1	Resource Efficiency and Pollution Prevention	Low	2022 Iv. Quarter	Continually- Once a year	Performance measurement and monitoring and reporting of projects to be implemented in the new facility and innovative applications in production processes should be carried out and the World Bank Group's Environmental, Health and Safety Guidelines etc. should be adapted to international good sector practices.	<p>Risk assessment study and monitoring reports</p> <p>Permissions and institution opinion articles</p>
3.2	Resource Efficiency	Low	2022 Third Quarter	Continually- Once a year	Water and energy saving applications should be developed for resource efficiency in the new facility.	<p>Productivity and savings projects</p> <p>Resource consumption data</p>
3.3	Greenhouse Gases	Low	2022 Third Quarter	Continually- Once a year	In order to reduce indirect emissions, awareness-raising projects for the primary supply chain should be produced.	Supply chain activities

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
3.4	Water Consumption	Low	2021 Iv. Quarter	Continually- Once a year	Photocell tap should be used to reduce personal water use at the new facility.	<p>Facility physical equipment</p> <p>Water consumption data</p>

3.5 3.6 3.7	Pollution Prevention Wastes Hazardous Substance Management	Low	2022 First Quarter	Continually- Once a year	Iso 14001 Environmental Management System certification process should be initiated.	ISO 14001 accreditation and audit documents  On-site environmental, waste and hazardous material management practices  Related physical equipment at the facility
<b>PS 4: Community Health, Safety and Security</b>						
4.1	Public Health and Safety	High	2021 Iv. Quarter	Continually- Once a year	A Personnel Service Procedure/Directive should be prepared in which the technical requirements and driving rules of the service vehicles to be used in personnel transportation are determined, implemented from the purchasing stage and monitored by the company's occupational network safety expert.	An Effective Procedure/Directive  Monitoring and audit records
4.2	Infrastructure, Equipment Design and Safety	High	2021 Iv. Quarter	Continually- Once a year	It should be assessed whether the new plant process equipment and physical elements pose health and safety risks to employees.	Risk assessment report/forms  Physical elements at the facility  Audit records and applications
4.3	Management and Safety of Hazardous Substances	Low	2021 Iv. Quarter	Continually- Once a year	Risk assessment of hazardous substances used in the process should be carried out and employees should be trained in the transportation, use and removal of these substances.	Risk assessment report/forms  Physical elements at the facility  Education records
4.5	Exposure of Communities to Disease Risk	Low	2021	Once-	An infectious disease risk assessment should be carried out in accordance with the process	Risk assessment report



Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
			Iv. Quarter	2022 First quarter	and personnel situation at the new facility and employees should be informed about the results.	Education records
4.6	Emergency Preparedness and Response	Low	2022 First Quarter	Once-2022 First quarter	After the relocation process to the new facility, an assessment should be made about the capacity and support needs of OSB and nearby institutions to respond to emergencies.	Interview recordings
4.7	Security Personnel	Low	2022 First Quarter	Once-2022 First quarter	Security personnel should be given refresher training on human rights, crowd management, limiting and prudent use of security activity, proportional use of force and community relations and communication.	Education records
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>						
5.1	Projecting	N/A (the necessary description is given in the Gap Analysis according to IFC Performance Standards section)				
5.2	Compensation and Assistance to Be Given to Displaced Persons					
5.3	Public Participation					
5.5	Reinvestment and Livelihood Recovery Plans and Implementation					
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
6.1	Biodiversity Conservation	N/A (the necessary description is given in the Gap Analysis according to IFC Performance Standards section)				
6.6	Legally Protected Areas and Internationally Recognized Areas	N/A (the necessary description is given in the Gap Analysis according to IFC Performance Standards section)				

6.7	Invasive Alien Species	Low	2022 Third Quarter	Once- 2022 IV.quarter	During landscaping on the land of the new facility, plantation with invading-spreading species should be avoided, technical applications should be carried out with the help of expert Forest Engineer or Landscape Architect.	
6.8	Management of Ecosystem Services	N/A (the necessary description is given in the Gap Analysis according to IFC Performance Standards section)				

Gap Analysis No.	Topic	Risk Rating	Timeline	Monitoring Period	Action to Take	Target and Evaluation Criteria for Successful Implementation
6.10	Supply Chain	Low	2022 Third Quarter	Continually- Once a year	Especially in cases where food, fiber etc. commodities are purchased as raw materials, it should be reviewed whether the primary supplier produces in natural and/or critical habitats or has a negative impact and, if possible, it should be proven that production is carried out with approved/certified management systems and products.	
<b>PS 8: Cultural Heritage</b>						
8.1	Protection of Cultural Heritage During Projecting and Implementation	N/A (the necessary description is given in the Gap Analysis according to IFC Performance Standards section)				
8.2	Random Discovery Procedures					
8.3	Consultation					