

**TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT
(PUMREP)**

LABOUR MANAGEMENT PROCEDURES

SPP-1: 3,168.63 kWp/2500 kWe

SPP-2: 3,070.53 kWp/2500 kWe

**Solar (Photovoltaic) Power Plant Projects
of Kepez Municipality**

JULY, 2025

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LIST OF ABBREVIATIONS

CIMER	Presidential Communication Center
ETL	Energy Transmission Line
EHS	Environmental and Health and Safety
ESS	Environmental and Social Standards
ILBANK	Iller Bank Inc.
ILO	International labour Organization
LMP	Labour Management Procedure
OHS	Occupational Health and Safety
PMU	Project Management Unit
PIU	Project Implement Unit
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SPD	Standard Procurement Documents
SPP	Solar Power Plant
TA	Technical Assistance
WHO	World Health Organization

INTRODUCTION

This Procedure describes the requirements for work and working conditions to be applied during the pre-construction, construction and operation phases of SPP Projects in Türkiye, which will be financed by the World Bank, managed and supervised by İller Bank Inc. (İLBANK) and implemented by Kepez Municipality. It aims to support fair and equal labour practices in all sub-components listed below, regarding fair treatment, non-discrimination and equal opportunities for employees. It aims to protect the rights of project employees and to ensure the management and control of activities that may lead to labour-related risks.

This procedure describes the requirements and expectations regarding compliance, reporting, roles and responsibilities, monitoring and training regarding labour and working conditions. This procedure is implemented by İLBANK and will apply to all project employees. It describes how İLBANK will comply with the requirements of the World Bank Environmental and Social Standard 2 (ESS2) "Labour and Working Conditions" and the Guidance Note (GN) and Turkish labour, employment and occupational health and safety laws.

This procedure assesses potential labour risks and impacts and describes how to mitigate these risks and impacts. İLBANK/Kepez Municipality will work to ensure that project contractors or other intermediaries purchasing labour implement this labour management procedure. This is a 'living' document and will be updated as detailed information becomes available.

Table 1 provides a summary of the sub-project descriptions to which the Labour Management Procedure will be applied.

Table 1. The sub-project descriptions to which the Labour Management Procedure will be applied.

Component	Types of Eligible Sub-Projects to be Financing
Component-1: Supporting infrastructure and facilitating environment for sustainability, competitiveness and efficiency of SPP	
SPP-2 (Sub-Project)	SPP-1 Kepez Municipality 3,168.63 kWp/2500 kWe SPP Project
SPP-2 (Sub-Project)	SPP-2 Kepez Municipality 3,070.53 kWp/2500 kWe SPP Project
Energy Transmission Line (ETL)	ETL Kepez Municipality SPP-1 and SPP-2, 0.5 km Energy Transmission Line

1 OVERVIEW OF LABOUR USE ON THE PROJECT

The projects are expected to include the following categories of employees as defined in ESS2. The number of sub-project employees to be assigned to the sub-project is 30 in total, including 15 personnel for SPP-1 and 15 personnel for SPP-2.

Directly Employed Employees: Directly employed employees will include ILBANK and Kepez Municipality employees in supervisory and technical roles who will work directly on the project. ILBANK employees are civil servants, therefore the provisions of the ESS2 on OHS, child labour and prohibition of forced labour will remain valid for Kepez Municipality personnel. They will also continue to be subject to the terms and conditions of their existing employment contracts. The estimated number of directly employed employees will be 5-6 personnel from the technical and financial units of ILBANK. The relevant personnel working in the investment, site selection, project, tender and construction units are civil servants and are all subject to the Civil Servants Law and Occupational Health and Safety (OHS) laws.

ILBANK is also expected to appoint independent consultants specializing in specific areas (e.g. design review, construction supervision, social protection measures, environmental assessment and public relations). These consultants are employed under individual contracts with specific job descriptions regarding assigned duties and responsibilities. The World Bank Procurement Guidelines will be applied in the selection of consultancy services. A certain number of Kepez Municipality personnel who will benefit from the project will also be involved in the general supervision of the construction works. Most of the employees of Kepez Municipality are civil servants.

The estimated assessment of the requirements and characteristics of the project employees to be assigned within the scope of the sub-project is given in Table 2.

Table 2. General Information about Sub-project Employees

Professional Personnel Types	Administrative, Technical and Financial Affairs Personnel, ILBANK Experts, Engineers	Administrative, Technical and Financial Affairs Personnel, Engineers and Technicians	Technical Personnel, Engineers, Occupational Health and Safety Specialist	Skilled/Unskilled/Semi-skilled Worker, Technicians/Engineers
Sub-project Types	ILBANK Personnel	Kepez Municipality Personnel	Control Consultants	Number Employees
SPP-1	5-6	5-6	3-4	15
SPP-2	5-6	5-6	3-4	15
ETL	5-6	5-6	3-4	15

Primary Suppliers: Primary supply workers will be firms that continuously supply goods or materials directly to the project for the main functions of the sub-project.

Migrant Workers: It is expected that local workers from nearby settlements and workers from other regions of Türkiye will be assigned to the sub-project. These workers will be considered as contract workers and the provisions of ESS2 regarding contract workers will apply to migrant workers. The sub-project is not expected to employ foreign workers. In such a case, they will be highly qualified technical personnel and will constitute a very small percentage of the total workforce. Previous experience with the construction of the solar power plant installation indicates that contractors and sub-contractors will likely employ workers from local towns and provinces. In cases where a workforce with the required skill profile is not available locally, contractors are expected to employ workers from other regions in Türkiye. The percentage of migrant workers coming from Türkiye will depend on the decisions taken by the contractors. It is expected

that these workers will be provided with accommodation needs such as hotels, rental houses, etc. within the borders of Kepez Municipality. Labour influx issues are discussed in other sections of the LMP.

Persons under the age of 18 will not be assigned to the sub-project. Turkish law prohibits persons under the age of 18 from working in very hazardous sectors (according to industry hazard classes) and the construction sector is classified as very hazardous under the current industry classification. If a minor is found to be employed on the project, measures will be taken to immediately terminate their employment or duties in the best interests of the child.

Considering the scope of the project workforce (mostly unskilled and semi-skilled construction workers) and the characteristics of the labour market in Türkiye, the number of female employees is not expected to be high. It is estimated that females will represent approximately 0.5 percent of the workforce and the workforce in question will probably include personnel working in technical (engineering) jobs and/or offices. All employees are expected to be over the age of 18 and the majority between the ages of 20-50.

The construction workers and the qualified personnel of the contractor company will stay in rented houses within the borders of Kepez Municipality, preferably close to the construction site. Accommodation standards will be determined in accordance with the Turkish Labour and OHS Regulations, the World Bank ESS2 requirements and the International Finance Corporation/European Bank for Reconstruction and Development Principles for the Accommodation of Employees.

The sub-project is expected to last 6 months for pre-construction and construction phases. Each sub-project is expected to have the main team as specified below. However, if additional needs are required, it can be expanded depending on the task or project location.

The construction contractor is expected to allocate separate teams for each main component. Each team will consist of teams that will perform specific manufacturing operations such as land clearing, foundation manufacturing, foundation excavation, electrical system installation, reinforced concrete works, finishing work and mechanical equipment installation. The type of work to be done will vary depending on the needs and requirements specific to each investment to be completed within the scope of this sub-project.

Approximately fifty percent of the employees will be unskilled workers. The rest of the employees will be assigned to semi-skilled and skilled positions such as managers, engineers, foremen, drivers and equipment operators and electrical workers. The majority of unskilled workers are expected to be locals, while semi-skilled and skilled workers, including management and technical staff, are expected to come from other parts of Türkiye. Unskilled workers will be assigned in the initial stages of construction. After the land is cleared and the foundations are laid, more skilled workers will be assigned and will install the mechanical and electrical equipment. During the pre-commissioning and commissioning stages of the SPP and Supervisory Control and Data Acquisition (SCADA) system, Kepez Municipality representatives will be informed and included in the preparation process for the delivery of the systems.

2 ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

2.1 Sub-project Activities

Sub-projects; Antalya province, Kepez district, Varsakyaylası neighborhood, lot 161 of block 159 will be implemented. Sub-project selections will be implemented after the application of the relevant Kepez Municipality to ILBANK is finalized. Sub-projects cover basic infrastructure constructions of the Municipalities, projects that will improve the environmental and social level, and innovation center constructions. The construction of such projects generally includes the following activities:

1. Preparation of the route (e.g. natural gas line, power lines, old transmission/distribution/network lines, etc., control of other existing services);
2. Construction of connection roads;
3. Land cleaning;
4. SPP construction;
5. Rehabilitation of transmission lines and network lines (where necessary);
6. Welding and coating of pipes for transmission and network lines;

7. Transportation of materials to the work area;
8. Provision of electrical services (where necessary);
9. Installation of fire hydrants and fire suppression systems;
10. Restoration and revegetation of affected areas;
11. Installation of safety barriers, fences, safety nets, labels, safety signs;
12. Establishment of work camps and storage and preparation areas.

2.2 Significant Workforce Risks

Significant labour risks are associated with health and safety risks related to the construction activities of subprojects, such as exposure to physical, chemical and biological hazards such as the use of heavy equipment during construction work, slip and fall hazards, exposure to noise and dust, falling objects, exposure to hazardous substances and exposure to electrical hazards during the use of tools and machinery. Since the construction work involves hazardous work, persons under the age of 18 will not be assigned to the project. Most workers will be exposed to occupational health and safety hazards, including but not limited to:

- Working at heights,
- Fires caused by electric shocks and arcing (use of defective electrical devices such as cable plugs, cords, hand tools),
- Electrical work,
- Exposure to chemicals (such as paint, solvents, lubricants, fuel),
- Use of chain saws and tree felling during lumber cutting,
- Walking and working in steep and dangerous areas,
- Traffic accidents,
- Heavy lifting,
- Accidents from exposed reinforced concrete,
- Ergonomic hazards during construction,
- Environmental hazards (snakes, wasps, bees, etc.),
- Steel construction (tower) hazards,

Lack of awareness of occupational health and safety requirements such as personal protective equipment (PPE) and safe workplace practices, and use of rotating and moving equipment.

Overtime work hours in general pose a potential workforce risk in the construction sector in Türkiye. Due to the limited time frame of the project and the restrictions on construction work due to seasonal conditions, there is a risk that subcontractor workers may work overtime above the annual limit determined by the Labour Law. The prevention of this risk is explained in the Terms and Conditions section.

The risk of Sexual Exploitation and Abuse/Sexual Harassment is anticipated to be low in the project to support the infrastructure works of municipalities in Türkiye. Despite the potential presence of workers from other regions in Türkiye, the risk associated with the impacts of the labour force influx is expected to be low. The majority of the workforce will be Turkish and most of the recruitment will be from the local region. This assessment is based on previous experience with projects involving major construction works in Türkiye. In the past, there have been no complaints from local communities regarding inappropriate behavior of workers in projects financed by the WB. Due to local cultural norms, project workers from other regions generally have limited interaction with the local population. Other sections of the LMP include measures against Sexual Exploitation and Abuse/Sexual Harassment. However, if other labour force risks arise during project implementation, The establishment and implementation of the necessary procedures are the responsibility of the Sub-borrower Kepez Municipality and the Contractor company.

3 BRIEF OVERVIEW OF LABOUR LEGISLATION: TERMS AND CONDITIONS

Below is an overview of the key aspects of the National Labour Law (Turkish Labour Law-4857) in relation to the ESS2 terms and conditions of work.

3.1 Labour Law

Employee-employer relations are regulated by the provisions of the Turkish Labour Law (No. 4857).

3.2 Forced Labour and Child Labour

The Turkish Labour Law does not cover forced labour. However, Article 18 of the Constitution of the Republic of Türkiye prohibits forced labour. "No one shall be subject to forced labour. Forced labour is prohibited. Work during the period of conviction or detention, the form and conditions of which are regulated by law; services to be requested from citizens in cases of emergency; physical and intellectual work in the nature of a civic duty foreseen in areas where the needs of the country are imperative, shall not be considered forced labour."

Article 80 of the Penal Code penalizes human trafficking and Article 117 prohibits restrictions on the freedom to work. Türkiye has ratified ILO Convention No. 29 on Forced Labour and ILO Convention No. 105 on the Abolition of Forced Labour.

The Turkish Labour Law specifies the conditions under which a child may work, as well as the minimum age (Article 71, Section 4). The minimum age for employment is 15, but in certain vocational training situations, children as young as 14 may be granted a permit to work in light work.

According to Article 73 of the Turkish Labour Law, male children under the age of eighteen and female children, regardless of their age, must not be employed in mining, cable laying and sewer and tunnel construction work.

3.3 Salaries and Deductions

The employment contract (contract of service) shall determine the form and amount of wages. In accordance with Articles 32-62 of the Turkish Law, the section on wages and payment describes the payment of wages and deductions. The wage shall be paid at least monthly. The minimum wage limit is regulated in accordance with Article 39 of the Turkish Labour Law.

3.4 Working Hours

According to Article 71 of the Turkish Labour Law, the working hours of children who have completed their basic education but are not attending school shall not exceed seven hours per day and thirty-five hours per week. However, this working period may be increased to forty hours per week.

3.5 Rest Breaks

According to Article 67 of the Turkish Labour Law, the beginning and end of daily working hours and rest breaks shall be notified to employees by the institution. Depending on the scope of the activity, the start and end times of work may be set differently for each employee.

According to Article 68 of the Turkish Labour Law, employees are entitled to a rest break approximately halfway through the workday, depending on the characteristics of the workplace and the requirements of the job. This right may be provided as follows;

- Fifteen minutes if the work lasts four hours or less,

- Half an hour if the work lasts more than four hours and less than seven and a half hours (seven and a half hours included),
- One hour if the work lasts more than seven and a half hours.

These are minimum periods and employees must be allowed to use the entire time given in each break.

In accordance with Article 46 of the Turkish Labour Law, employees working in institutions within the scope of this Law will be given the right to a minimum of twenty-four hours of rest (weekly holiday) without interruption within a seven-day period, provided that they have worked on the days before the weekly holiday, as specified in Article 63. The employer will include this holiday in the daily wage of the employee without any obligation to work in return.

3.6 Leaves

According to Article 53 of the Turkish Labour Law, employees who have completed one year, including the probation period, within the same institution from the date of their employment are entitled to paid annual leave. The paid annual leave periods of employees shall not be less than;

- If they have a service period between one and five years (including the fifth year),
- If they have a service period of more than five years but less than fifteen years, it shall not be less than twenty days, and
- If they have a service period of more than fifteen years (including fifteen), it shall not be less than twenty-six days.

The paid annual leave period for employees under the age of eighteen and over the age of fifty shall not be less than twenty days. The provisions of this Law regarding paid annual leave shall not apply to employees working in seasonal and other jobs due to a service period of less than one year.

According to Article 55 of the Turkish Labour Law, national holidays, weekly holidays and official holidays that overlap with annual leave cannot be included in the annual leave period.

According to Article 74 of the Turkish Labour Law, in principle, female employees should not be allowed to work for a total of sixteen weeks, eight weeks before and eight weeks after birth. Multiple pregnancies will add an additional two weeks to the eight-week period before the delivery period when the woman cannot work. However, a female employee whose health condition is assessed as appropriate by a medical report may work at her own request until three weeks before delivery. In this case, the period she works will be added to the leave period after delivery.

If requested, a female employee will be granted six months of unpaid leave after the sixteen-week leave period or eighteen weeks in the case of multiple pregnancies has ended. This period will not be taken into consideration in determining the employee's one-year service period regarding the paid annual leave entitlement. Female employees have the right to a total of one and a half hours of breastfeeding leave to breastfeed their children under the age of one. The employee will decide when and how many times to use this leave. The duration of the breastfeeding leave will be considered as part of the daily working hours.

3.7 Overtime Hours

According to Article 41 of the Turkish Labour Law, for each hour spent as overtime, a wage of one and a half times the normal hourly wage will be paid. In the event that the weekly working hours are determined to be less than forty-five hours by contract, in accordance with the principles stated above and exceeding the weekly average working hours up to forty-five hours per week will be considered as overtime. During overtime hours, the wage for each overtime hour will be 1.25 times the normal hourly wage for workers working less than 45 hours per week. In the event that the worker who stays overtime or works overtime wants to use leave instead of overtime pay, he/she has the right to use one and a half hours of leave for each hour worked overtime and one hour and fifteen minutes of leave for each hour worked overtime.

The employee will use the rest periods he/she is entitled to within six months, within working hours and without any deductions from his/her salary. The employee's permission must be obtained for overtime. The total working hours will

not exceed two hundred and seventy hours per year. Overtime and its methods will be specified in the regulation to be issued.

3.8 Labour Disputes

The Turkish Labour Law includes provisions that will ensure the resolution of disputes in cases where there is a disagreement between the employer and the employee regarding the basic terms and conditions of the employment contract or other labour issues. The dispute in question will be resolved in accordance with the Law on Mediation in Legal Disputes No. 6325 and Article 20 of the Turkish Labour Law. The employee who claims that there is no justified reason for the termination of the employment contract or that the reason provided is not sufficient for the termination of the employment contract will have the right to appeal the termination decision to the labour court within one month from the date of receipt of the termination notice. If there is an arbitration clause in the collective agreement or if the parties agree to this, the dispute in question may be referred to a special arbitration board within the same period. The employer is obliged to prove that the termination is based on a valid reason. However, this obligation will belong to the employee if he/she claims that the termination is based on a reason different from the reason provided by the employer. The court must apply expedited hearing procedures and conclude the case within two months. In cases where an appeal is filed against the decision, the Court of Cassation must give its final decision within one month.

The Turkish Labour Law applies to directly employed employees and subcontracted workers, including full-time foreign workers.

3.9 Trade Union Rights

The union regulations of workers and civil servants are different. Workers are covered by the Law No. 6356 on Trade Unions and Collective Agreements (Official Gazette No. 28460, 07.11.2012). There are four different types of collective agreements regulated by local law: workplace collective agreements, institutional collective agreements, group collective agreements and framework agreements. While a workplace agreement is made for a single workplace, agreements concluded at the institutional level are made for multiple workplaces owned by the same employer in the same sector. Group collective agreements are made between the labour union and the employer's union for workplaces owned by different employers in the same sector.

3.10 Prevention of Discrimination

According to Article 10 of the Turkish Constitution, 'everyone is equal before the law without distinction of language, race, color, gender, political opinion, philosophical belief, religion, sect and similar reasons. The article also states that 'women and men have equal rights'. The state is obliged to ensure that this equality is achieved in practice. Measures taken for this purpose shall not be interpreted as contradicting the principle of equality.

Article 5 of the Turkish Labour Law addresses the issue of preventing discrimination in working life. According to this article, 'no discrimination can be made in the employment relationship based on language, race, gender, political opinion, philosophical belief, religion, sect and similar reasons. Unless biological or work-related reasons make it necessary, the employer cannot directly or indirectly treat an employee differently due to gender or pregnancy in the conclusion, establishment, implementation and termination of the employment contract'. The same article also emphasizes the principle of equal wage for equal value work by stating that 'lower wages cannot be decided for the same or equal value work due to gender'.

3.11 Mass Dismissal

According to Article 29 of the Labour Law No. 4857, when the Employer wants to mass lay off workers due to economic, technological, structural and similar requirements of the business, workplace or work, he/she shall notify the workplace union representatives, the relevant regional directorate and the Turkish Employment Agency in writing at least thirty days in advance.

If the number of workers employed in the workplace is,

- between 20 and 100 workers, at least 10 workers;
- between 101 and 300 workers, at least ten percent of the workers;
- if 301 or more, at least 30 workers, the termination of their employment on the same date or on different dates within a one-month period in accordance with Article 17 shall be considered as mass dismissal.

The Turkish Labour Law No. 4857 is largely in line with the requirements of ESS2. Türkiye has ratified the four Fundamental ILO Conventions and the ILO Convention on OHS. The main difference with ESS2 concerns the grievance mechanism for workers. While national legislation provides for Labour Courts to address issues related to workers' rights, the Labour Law does not provide for a workplace grievance mechanism. The Labour Law contains provisions to ensure payment of wages for contract workers, but does not contain provisions for the selection, management and monitoring of contractors in relation to the requirements of ESS2. The Labour Law applies to those who would be considered as contract workers under the definition of ESS2.

4 BRIEF OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Turkish Occupational Health and Safety Law No. 6331 contains provisions on occupational health and safety and applies to directly employed employees, including foreign workers, and subcontracted workers. This issue is also governed by the Labour Law No. (4857).

The following general information addresses the basic aspects of the regulations regarding the articles specified in paragraphs 24 and 30 of ESS2.

- Each individual on the sub-project has the right to stop work until the hazardous behavior/conditions are eliminated.
- All possible hazards to the health and life of workers will be identified for the construction activity (Risk Assessment is prepared and shared with the workers).
- The party employing workers will develop and implement procedures to create and maintain a safe working environment, including the safe operation of workplaces, machinery, equipment and processes under their control without endangering health. These procedures will cover taking appropriate precautions regarding chemical, physical and biological substances and elements.
- In cases where hazards to health and safety cannot be prevented, appropriate protective measures will be implemented. These measures include the implementation of protective solutions and the provision of sufficient free personal protective equipment (PPE) to project/subproject employees, and the control of the hazard from its source.
- Each party employing workers for the project, namely the employer, will have health and safety specialists at construction sites. The employer is obliged to appoint a health and safety specialist in accordance with the hazard class of the workplace, in accordance with legal requirements.
- Sub-project employees will receive orientation at the beginning of their work processes and regular OHS training to meet legal requirements later. The training will cover relevant OHS issues related to daily work, including issues such as stopping work without causing danger and finding solutions to emergencies. Training records will be kept in a file. These records will include the description of the training, the total hours of training, participation rates in the training, and evaluation results.

The employer will ensure the health and safety of employees in all matters related to the work. The employer shall take the necessary measures to ensure the health and safety of employees, including the provision of the necessary organization and tools, adaptation of measures to changing conditions and improvement of current situations, as well as the prevention of occupational risks and provision of information and training (Turkish Occupational Health and Safety Law, Article 4).

The employer shall conduct or have a risk assessment conducted (Turkish Occupational Health and Safety Law, Articles 4 and 5).

The employer shall take the necessary measures to prevent access to vital and special hazardous areas by employees other than those who have been given sufficient information and instructions (Turkish Occupational Health and Safety Law, Article 4).

The obligations of employees in the field of occupational health and safety shall not affect the responsibilities of the employer (Turkish Occupational Health and Safety Law, Article 4).

The employer shall provide occupational health and safety services, including activities related to the prevention of occupational risks (Turkish Occupational Health and Safety Law, Articles 5, 6 and 7).

The employer shall appoint workplace physicians and occupational safety experts (Turkish Occupational Health and Safety Law, Article 8).

It shall determine possible and probable emergencies that may affect employees and the work environment by evaluating in advance the work environment, substances used, work equipment and environmental conditions and shall take measures to prevent and limit their negative effects. The employer shall make the necessary measurements and evaluations to protect against the negative effects of emergencies and prepare emergency plans. (Turkish Occupational Health and Safety Law, Article 11).

The employer shall make the necessary arrangements in advance and give the necessary instructions to employees so that they can leave their workplaces immediately and go to a safe place (Turkish Occupational Health and Safety Law, Article 12).

The employer shall ensure that employees are subject to health checks and health surveillance. Those who will work in workplaces classified as hazardous and very hazardous cannot start work without a health report stating that they are suitable for the job they will do. Any costs arising from health surveillance shall be covered by the employer (Turkish Occupational Health and Safety Law, Articles 4 and 15).

The employer shall keep records of all occupational accidents and diseases, conduct necessary investigations and prepare reports on them. Each accident shall be reported to the employer, investigated and relevant measures shall be taken to prevent this accident from happening again in the future. In addition, solutions shall be provided for negative effects such as occupational injuries, disabilities and diseases (Turkish Occupational Health and Safety Law, Article 14).

The employer shall inform employees and employee representatives about occupational and safety risks, protective and preventive measures, legal rights and responsibilities related to them, first aid, extraordinary situations, disasters, firefighting and evacuation tasks and the persons assigned (Turkish Occupational Health and Safety Law, Article 16).

The employer shall ensure that each employee receives health and safety training. This training shall be provided especially before starting work, in case of change of workplace or job, in case of change of work equipment or in case of application of new technology. (Turkish Occupational Health and Safety Law, Article 17).

The Regulation on Occupational Health and Safety in Construction Works, Annex 4, Articles 53-67, published in the Official Gazette dated 05.10.2013 and numbered 28786, states that project workers should be provided with appropriate facilities for their work, including access to a canteen, hygiene facilities and appropriate rest areas. The OHS Law No. 6331 defines the basic conditions and general principles of occupational health regarding hazardous, very hazardous and less hazardous jobs (Turkish Occupational Health and Safety Law, Article 9). The list of these jobs is provided in the laws of the Republic of Türkiye. According to the aforementioned list, construction works related to wastewater treatment plants, drinking water transmission and network lines, sewage systems and electrical works are generally classified as very hazardous jobs due to their nature, while waste separation (non-hazardous) work is considered hazardous. The law imposes a general responsibility on employees to provide a safe and healthy working environment and to inform employees about jobs that may pose a potential risk to health and safety. The measures to be taken should include taking the relevant preventive measures as well as training and information campaigns. The law includes requirements for organizing and managing health and safety programs by providing emergency care and services and resolving accidents. Other requirements include control of access to hazardous workplaces, free provision of personal protective equipment to employees, and medical examinations (Turkish Occupational Health and Safety Law, Articles 9-10-11). In addition, the Occupational Safety Law includes provisions that ensure that employees are involved in a

consultancy process regarding health and safety issues, and that advise on risks and hazards and raise awareness (Turkish Occupational Health and Safety Law, Article 25). However, there are no specific requirements regarding the grievance mechanism that allows employees to report their complaints to the employer. This can be considered as a gap between the Turkish regulations and ESS2. The grievance mechanism will be discussed in detail in this document (see Chapter 10).

5 RESPONSIBLE STAFF

ILBANK will supervise, monitor and manage all sub-projects, including monitoring of labour and OHS-related issues. The supervisory consultant will perform this task on behalf of ILBANK. ILBANK will be responsible for the following:

- Implementation of this Labour Management Procedure to directly employed employees (including consultants), subcontracted workers and primary supplier employees (if any),
- Ensuring that project contractors responsible for the construction of sub-projects adopt this Labour Management Procedure and Occupational Health and Safety Plan prior to the construction phase,
- Appointment of an OHS expert responsible for the implementation of OHS measures in compliance with relevant EHS and national laws and regulations,
- Ensuring that the OHS expert responsible for the supervision of the implementation of OHS measures in compliance with relevant EHS and national laws and regulations is appointed by ILBANK in the Supervision Consultancy firm and municipalities,
- Monitoring whether the sub-project contractors fulfill their obligations towards contracted and sub-contracted workers as specified in the General Conditions of Contract and World Bank Standard Procurement Documents and in accordance with ESS2 and national labour and OHS law,
- Monitoring whether the sub-project contractors implement the Labour Management Procedures,
- Monitoring whether the directly employed keeping records of the recruitment and employment process of employees,
- Monitoring the employment processes of subcontracted workers in order to ensure that they are implemented in accordance with this Labour Management Procedure and the national labour law,
- Monitoring whether occupational health and safety standards are fulfilled in the workplaces in line with the National Occupational Health and Safety legislation and the Occupational Health and Safety Plan,
- Monitoring the training of sub-project employees in accordance with the Turkish Occupational Health and Safety Law, establishing a grievance mechanism for sub-project employees and monitoring whether it is implemented, and monitoring whether the Employees' Code of Conduct is implemented.

The Supervisory Consultant(s) will carry out their duties on behalf of the Employer (ILBANK) on a daily/monthly basis or at specified periods. The Supervisory Consultant(s) will employ qualified experts for the relevant audit activities and will report the performance of the contractors to ILBANK on a monthly basis.

Kepez Municipality should establish sub-project Implementation Units (PIU). This PIU will be composed of municipal employees with the necessary skills and competence to carry out representation functions and technical/contract management control works with the support of the control consultant. Kepez Municipality should be provided with personnel who can manage all issues related to the implementation of the sub-projects. As stated in the sub-project financial agreements between ILBANK and Kepez Municipality, the PIU will be responsible for the effective management of the sub-projects. ILBANK will prepare and evaluate the tender documents for the investment and Technical Assistance (TA) components with the representation of Kepez Municipality in the evaluation committees. However, Kepez Municipality will be the contracting authorities for the relevant sub-projects. Therefore, with the help of the municipal control consultants, they will carry out the following.

- Implementation of this Labour Management Procedure for directly employed workers (including consultants), sub-contracted workers and primary suppliers (if any):

- Ensuring that sub-project contractors responsible for the construction of sub-projects adopt this Labour Management Procedure and Occupational Health and Safety Plan prior to the commencement of construction; Monitoring that sub-project contractors fulfill their obligations to contracted and subcontracted workers in accordance with the general contract conditions in the World Bank Standard Procurement Documents, ESS2 and national Labour and Occupational Health and Safety legislation;
- Monitoring that sub-project contractors implement the Labour Management Procedure;
- Regulating the recruitment and employee registration of directly employed workers;
- Monitoring that the recruitment processes of contracted workers comply with the Labour Management Procedure and the national Labour Law;
- Monitoring that occupational health and safety standards are met in workplaces in line with national Occupational Health and Safety legislation and the Occupational Health and Safety Plan;
- Ensuring that sub-project workers receive training in accordance with national Occupational Health and Safety legislation monitor,
- Ensure that a Grievance Mechanism is established for project employees and monitor its implementation,
- Monitor that the Employee Code of Conduct is implemented.

In addition to legal requirements and ILBANK's Labour Management Procedure, project contractors will also be responsible for the following:

- Employment or appointment of qualified social, labour and occupational safety experts to implement the project-specific Labour Management Procedure and occupational health and safety plans and to manage the performance of sub-contractors,
- Adopt the labour management procedure and occupational health and safety plan that will apply to contracted and subcontracted workers. These procedures and plans should be submitted to ILBANK for review and approval by contractors before they proceed to the pre-construction phase,
- Inspect subcontractors for compliance with labour management procedures and Occupational Health and Safety Plans,
- Keep records of the recruitment and employment process of subcontracted workers,
- Monitor the employment processes of subcontracted workers in order to ensure that these labour management procedures are implemented in accordance with the national labour law,
- Clearly explain the job description and employment conditions to subcontracted workers,
- Develop and implement employee grievance mechanisms and address complaints from contracted and subcontracted workers,
- Create a system for regular monitoring and reporting of labour and occupational health and safety performance,
- Provide regular orientation (including social orientation) and legally required health and safety training to employees,

- Ensure that all contracted and sub-contracted workers read and sign the Code of Conduct before starting work.

6 POLICIES AND PROCEDURES

This section outlines the basic principles and guidelines to be followed during the pre-construction and construction phases of the sub-project. This section will be updated and revised as necessary after the construction contract is signed.

6.1 Contractor Responsibility

Contractors shall adopt and implement the Code of Business Conduct. The Code of Business Conduct shall also include measures to address issues of Sexual Exploitation and Abuse/Sexual Harassment(SEA/SH). Contractors shall also submit the Code of Business Conduct to ILBANK for review and approval. The Code of Business Conduct shall reflect the company's core values and overall work culture. The content of the Code of Business Conduct is included in the World Bank Standard Tender Documents and shall be submitted to ILBANK for review and approval.

Contractors shall be required to provide periodic information on their performance in labour, occupational health and safety. The information shall be included in the contractors' monthly report and reviewed by ILBANK.

In addition, contractors shall report to ILBANK on all inspections and audits conducted by the relevant ministries – the Ministry of Family, Labour and Social Services, the Ministry of Health of Türkiye. The findings of the business audits will be submitted to ILBANK and the World Bank upon request.

6.2 Occupational Health and Safety (OHS)

In accordance with the relevant provisions of the national labour law, ESS2 and the World Bank Standard Procurement document, all contractors and subcontractors shall manage the construction site in a way that appropriately protects workers and communities against potential OHS risks. The following OHS standard requirements should be included in the OHS plan to be prepared by contractors as a minimum:

- Risk Assessment Procedure,
- Work permit for hazardous work (work at height, hot work, work on live lines, work in confined spaces),
- Golden rules for life-threatening work,
- Emergency intervention procedure,
- Fall prevention and work at height,
- Excavation safety, ladder and scaffolding safety; welding and cutting safety; cranes, hoists and forklift safety; power tool and hand tool safety,
- Prevention of inhalation of chemical and airborne contaminants (including dust, silica and asbestos); electrical safety (hazardous voltage control, lockout tagout, energy verification, safe distance work, wiring and design protection, grounding, circuit protection, arc flash protection, electrical safety, PPE and insulating tools); emergency communication; noise and vibration safety; steel erection safety; fire safety; material handling safety; concrete and masonry safety,
- OHS training
- Refusal to work policy.

In addition, Occupational Health and Safety Plans should include, among other things: an OHS obligation scheme that includes all personnel, including the project manager, contract manager, OHS personnel, foremen and all employees with job descriptions with OHS responsibilities shall be defined by construction contractors.

Contractors will appoint their own OHS personnel who will be responsible for the implementation and supervision of the OHS program.

PPE and other preventive measures will be provided free of charge to employees.

All employees will strictly comply with the Golden Rules (OHS rules cannot be violated under any circumstances) in life-threatening jobs, and the contract will include an enforcement mechanism supporting the implementation.

Contractors will take preventive and protective measures at the workplace and organize employee training in accordance with the WHO's COVID-19 guidelines.

There will be a construction OHS committee with representatives from employees, ILBANK, contractors and all subcontractors.

OHS meetings will be held every two weeks to discuss preventive measures, deviations and non-conformities, accidents and corrective actions.

Contractors will conduct internal OHS surveys and audits to verify the compliance of OHS practices. Non-conformities will be documented and reported to ILBANK. A period will be determined and followed for the elimination of non-conformities.

Daily OHS briefings, safety group meetings will be held prior to the start of work, highlighting the hazards and preventive measures for each job contractors will document and report to the ILBANK all accidents and illnesses that result in one or more days lost, and any deaths or serious injuries that may occur on the job site. The site must have the necessary equipment for first aid, a pre-approved health facility for medical treatment in the event of more serious injuries, and vehicles to ensure the appropriate transportation of injured workers.

Contractors will allow access to the site only to authorized personnel and verify that workers meet training and accreditation requirements in accordance with training standards and applicable legal requirements (truck drivers, crane and excavator operators and electricians must be accredited. The list of vocational training requirements is detailed in the Regulation on Vocational Training in Hazardous and Very Hazardous Classes published in the official gazette dated 13.07.2013 and numbered 28706).

Workers must be trained to perform hazardous work such as working at heights, working indoors, etc., including the provisions of the Regulation on Occupational Health and Safety Training Procedures and Principles published in the Official Gazette dated 15.05.2013 and numbered 28648. It is mandatory for all workers to complete minimum OHS training in order to enter the construction site.

In the accommodation for workers, contractors will ensure that these places have clean drinking water with good hygiene standards, clean beds, toilets and showers, clean rooms, good lighting, lockers, proper ventilation, safe electrical installation, fire and lightning protection, and separate cooking and dining areas. Separate facilities will be provided for male and female.

ILBANK and/or the Audit Consultant (on behalf of ILBANK) will conduct periodic audits of the contractors' OHS performance, including site visits, at least monthly, preferably weekly. These audits will cover compliance with the above-mentioned standards, accidents, violations of the golden rules, recommendations, and progress of ongoing corrective actions. ILBANK will include in the contract(s) a requirement that contractors report on issues such as the number of accidents and the number of days lost due to accidents, the number of repeated non-compliances, violations of the golden rules, deaths and serious injuries, and penalties for compliance violations.

ILBANK will review and approve contractors' safety plans and procedures.

ILBANK will notify the World Bank within 48 hours of any incident or accident that has or is likely to have a significant adverse impact on the environment, affected communities, the public, or workers related to the project. Such incidents may include strikes or other worker protests, serious worker injuries or deaths, project-related injuries to individuals in the community, or property damage.

According to the National OHS Law, all employers must notify the Ministry within 3 working days after any OHS-related incident. In particular, for any significant environmental or social incident (e.g. deaths, time-loss incidents,

environmental spills, etc.), project contractors shall notify ILBANK within 3 working days, and ILBANK shall notify the World Bank about the incident as soon as it is notified. The incident report, including the source analysis, measures taken, and compensation measures, shall be submitted to ILBANK within 15 calendar days, and ILBANK shall share the incident report with the World Bank within 30 calendar days.

ILBANK employees may conduct site visits and construction activity inspections. Direct sub-project employees are not expected to engage in activities that pose high health and safety risks. The current national OHS law requires ILBANK personnel to use appropriate personal protective equipment (PPE) during their work on site. These include high-visibility vests, helmets, eye protection, and safety boots (extra PPE may be added depending on weather conditions and risks of work activities). No special equipment provision is required.

ILBANK will determine the traffic management requirements applicable to ILBANK vehicles used during project implementation. These include the presence of first aid kits in vehicles, periodic inspection of vehicles and fleet, and ensuring the safety requirements of drivers while driving according to traffic and driving requirements in Türkiye. (Highway Traffic Law No. 2918).

6.3 Terms and Conditions of Employment

As stated in the Turkish Labour Law and the World Bank Environmental Social Framework, the employment of sub-project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination in any aspect of employment relations, such as recruitment, compensation, working and employment conditions, access to training, promotion or termination of employment. The following measures will be taken by contractors and monitored by ILBANK and, if applicable, consultants to ensure that all workers are treated fairly:

Recruitment procedures in accordance with the requirements of the Labour Law will be transparent, publicly available and will not discriminate on the basis of ethnicity, religion, sexual orientation, disability, gender and other grounds set forth in the Labour Law;

- Job applications will be evaluated according to the application procedures determined by project contractors, including subcontractors;
- Job descriptions will be determined prior to recruitment and the skills required for each task will be explained.
- All workers will have written contracts that describe their terms and conditions of employment and the content will be explained to them. Workers will sign an employment contract. Terms and conditions of employment will be available at the workplaces;
- Unskilled labour will be preferred to be recruited from affected communities, settlements and municipalities;
- Employees will be notified of termination at least one month before the planned termination date. According to the Turkish Labour Law No. 4857, all dismissals, including collective dismissals, will be subject to Article 29 of the Law;
- Contracted workers will not pay any recruitment fees. If any recruitment fees are incurred, they will be paid by the Employer ('Contractors');
- Depending on the origin of the Employer and the employee, contracts will be prepared in the relevant language that both parties can understand;
- In addition to the written documents, workers who have difficulty understanding the documents will be provided with a verbal explanation of the terms and conditions of employment.
- While problems with the language of communication are not expected, care will be taken to ensure coordination between different subcontractors and to take into account any possible language differences;
- Foreign workers, immigrants, will need a residence permit that will allow them to work in Türkiye.
- ILBANK shall include in contracts that all project contractors (and subcontractors) personnel must be 18 years of age or older.

6.4 Workforce Influx and Gender-Based Violence

Contractors will be required to maintain good working relationships with local communities by adhering to the Code of Conduct. The Code of Conduct requires all persons engaged by the contractor, including subcontractors and suppliers,

to act according to reasonable standards of conduct. The Code of Conduct should include sanctions (e.g. termination) for non-compliance, including failure to comply with specific policies on gender-based violence, sexual abuse and sexual harassment.

The Code of Conduct should be written in plain language and signed by each worker to indicate that:

They have received a copy of the Code of Conduct as part of their contract;

- The Code of Conduct has been explained to them as part of their initiation of employment;
- It has been acknowledged that compliance with the Code of Conduct is a mandatory condition of employment; and
- It has been understood that violations of the Code of Conduct may result in serious consequences, including dismissal or legal recourse.

A copy of the Code of Conduct shall be displayed in a location that is readily accessible to the community and those affected by the project.

Contractors should address the risk of gender-based violence by:

- Mandating training and awareness-raising for the workforce on avoiding unacceptable behavior towards members of the local community, particularly women. Training can be repeated;
- Informing workers on national laws that make sexual harassment and gender-based violence a punishable offense;
- Adopting a policy to cooperate with law enforcement authorities in investigating complaints of gender-based violence;
- Implementing a system to identify complaints/issues related to gender-based violence, sexual abuse and workplace sexual harassment.

7 AGE OF EMPLOYMENT

According to Turkish law, workers under the age of 18 are not allowed to work in hazardous jobs and construction work is considered hazardous work. Therefore, workers under the age of 18 cannot be employed in construction work. The Ministry of Industry and Technology, a government agency, does not allow anyone under the legal age to work in the organization. Therefore, child labour risks are not expected in relation to the sub-project.

Sub-project contractors are responsible for verifying the ages of all workers. Workers are responsible for presenting official documents, including birth certificates, IDs, passports or driver's licenses, to the organization.

If it is determined that a minor is working on the sub-project, measures will be taken to immediately terminate their employment or employment, while protecting the best interests of the child.

8 TERMS AND CONDITIONS

The terms and conditions applicable to ILBANK employees are included in the ILBANK Human Resources Policy, which is prepared in accordance with the Turkish Labour Law (No. 4857) and the Civil Servants Law and includes the rights of ILBANK employees. These in-house work rules and regulations will apply specifically to ILBANK employees (directly employed employees) assigned to the project. The requirements of the ESS regarding OHS, prevention of child labour and forced labour apply to civil servants.

The terms and conditions for employees directly employed as consultants will be determined by individual employment contracts in accordance with the Labour Law.

A total of 2,577 personnel work in ILBANK, General Directorate and Domestic Service Units, 1,151 of whom work in the General Directorate and 1,426 in the Domestic Service Units. 1,242 personnel work in administrative services and 1,226 personnel work in technical services.

A 45-hour weekly working period has been determined for employees directly employed as ILBANK employees.

All sub-project workers shall be entitled to at least one day (24 hours) of rest at the end of a six-day consecutive working period.

The employment contracts between the employer (construction contractor) and the worker shall comply with the legal requirements of Türkiye and shall include the job description, working hours, working conditions and salary level (including overtime wages). In addition, the workers shall be required to sign a drug and alcohol use policy and a Code of Conduct. A copy of the contract shall be signed by both parties and a copy shall be given to the worker. The employer may require the workers to work overtime not exceeding 270 hours per year as specified in the Labour Law. In addition, the worker's permission to work overtime shall be obtained in January of each year as required by the Labour Law.

The sub-project contractors shall determine the terms and conditions for subcontracted workers who shall accept this labour management procedure as part of their contracts. These terms and conditions shall comply, to a minimum extent, with this labour management procedure, the Turkish Labour Law (No. 4857), the Occupational Health and Safety Law (No. 6331) and the General Conditions of the World Bank Standard Procurement Documents.

9 GRIEVANCE MECHANISM

The Turkish Labour Law does not include a Grievance Mechanism (GM) for workers at the employer level. Workers can lodge complaints through the legal system (courts) or government-established channels for lodging complaints, such as the Presidential GM system (see below) or the Ministry of Labour helpline number. These lodged complaints are then forwarded to employers who are responsible for handling complaints and reporting back to ILBANK on the status of complaints at the GMs.

PIU will develop and implement a grievance mechanism for direct workers to address workplace issues. The details of the Labour GM are set out below.

9.1 Purpose and Scope

The project-level GM is designed to serve as a mechanism to:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the sub-project;
- Provide channels for direct workers to address workplace issues;

The existence of an effective GM will also serve the following purposes: reduce conflicts and risks such as external interference, corruption or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

9.2 Workforce Related GM Structure

PIU will require contractors to develop and implement a grievance mechanism for the workforce, including subcontractors, prior to commencement of the works. Construction contractors will prepare labour management procedures prior to commencement of construction works, which will include a detailed description of the workers' grievance mechanism.

The workers' grievance mechanism will include:

- a procedure for receiving grievances, such as a Grievance Form (**ANNEX 2**), suggestion boxes, e-mail, telephone helpline;
- stipulated timeframes for responding to grievances and resolving cases;
- a grievance record tracking table to record and monitor timely resolution of grievances;
- and a unit responsible for receiving, recording, forwarding and resolving grievances,

The Supervisory Advisor will monitor the grievance records and resolutions of contractors and report them to PIU in the monthly progress reports. The process will be monitored by the Grievance Mechanism Focal Point, the PIU representative who will be responsible for the Grievance Mechanism project. The workers' grievance mechanism will be explained in the personnel recruitment trainings to be given to all sub-project workers. The mechanism will be based on the following principles:

- The process will be transparent and will allow workers to express their concerns and file their complaints;
- There will be no discrimination against those who express their complaints and complaints will be treated confidentially;
- Anonymous complaints will be treated in the same way as other complaints of known origin; and
- the management will take complaints seriously and take timely and appropriate action in response.

Information regarding the existence of the grievance mechanism will be easily accessible to all project workers (permanent and contracted) through notice boards, "suggestion/complaint boxes" and other means as needed.

Sub-project workers will be informed about the existence of the grievance mechanism through notice boards, "suggestion/complaint boxes" and other means as needed. While the project has a labour grievance mechanism, other grievance mechanisms (CIMER, ILBANK and Kepez Municipality) are used to submit complaints, feedback, questions, suggestions or satisfaction regarding labour issues as well as the overall management and implementation of the project. Issues related to sub-projects funded and supported by the sub-project, as well as:

- Mismanagement, misuse of project funds or corrupt practices,
- Violation of Project policies, guidelines or procedures, including those related to child labour, health and safety of community/subcontracted workers and gender violence and environmental issues,
- Complaints from stakeholders and other affected parties who are dissatisfied with the implementation methods of the Sub-project or other processes and components related to the implementation, and general feedback, including questions, suggestions, compliments.

Addressing Sexual Exploitation and Abuse/Sexual Harassment: Although the risk from the Sub-project activities and in the Turkish context is low, the Grievance Mechanism for workers will address complaints related to sexual exploitation and abuse and sexual harassment. A sexual exploitation and abuse/sexual harassment contact channel will be established and updated in accordance with the legal requirements of the country. The GM will have in place mechanisms for confidential reporting and safe and ethical documentation of sexual exploitation and abuse/sexual harassment issues. In addition, the Grievance Mechanism will have processes in place to promptly report any complaints of sexual exploitation and abuse/sexual harassment to both ILBANK and the World Bank with the consent of the survivor.

The grievance mechanism for sub-project workers will not prevent workers from using any other judicial mechanism to address their complaints.

The Grievance Mechanism levels included in the sub-project are as follows:

9.2.1 According to the National GM

Right to Information Law ("Article 11 - Institutions and organizations shall provide the requested information within 15 working days. However, if the requested information or document needs to be obtained from another unit within the institution or organization applied to or if the opinion of another institution needs to be obtained or if the scope of the application concerns more than one institution; access will be provided within 30 working days. In this case, the applicant will be notified of the extension and the reasons in writing within 15 working days."). All kinds of requests and

complaints regarding public institutions are received through the Presidential Communication Center (CIMER). Requests made through this channel are managed through the CIMER responsible connections in the public institutions. There are CIMER responsible personnel in Kepez Municipality who receive the complaint and direct it to the relevant parties, follow up the progress and assist in closing the grievance.

Kepez Municipality's CIMER mechanism will be made available to complainants in this sub-project. If any complaint is received regarding the sub-project, the CIMER responsible personnel in Kepez Municipality shall forward it to the GM point of the sub-project in ILBANK will be transmitted.

9.2.2 Kepez Municipality GM

Kepez Municipality has on-site Grievance Mechanisms that allow its employees, contractors and stakeholders to voice their concerns and complaints about the workplace. For this purpose, there are "Request and Grievance Boxes" in various sections of the buildings. In addition, requests, grievances and suggestions can be received through written petitions through Kepez Municipality White Desk (444 6 007). Any requests, suggestions or complaints can be sent from the "Communication" section on the Kepez Municipality website. In addition, any personnel can share their requests, suggestions or complaints with the Municipality administration.

Kepez Municipality, which receives credit from the sub-project, will be responsible for appointing a focal point responsible for receiving and resolving complaints. The focal point of Kepez Municipality will be responsible for keeping records of all requests, complaints and suggestions regarding the sub-project and forwarding them to the Kepez Municipality Administration. The Municipality administration will be responsible for resolving complaints in a timely manner within 15 working days. The focal point of Kepez Municipality will monitor and follow up the Grievance Mechanism and also provide information to ILBANK.

9.2.3 Within ILBANK GM

ILBANK receives official requests and complaints through the Presidential Communication Center (CIMER). Apart from CIMER, ILBANK may receive official complaints as official petitions or through online web channels.

A specialist will be assigned to act as the project's grievance mechanism focal point, who will receive project-related complaints through all existing Grievance Mechanisms in accordance with World Bank requirements. The Grievance Mechanism will also allow anonymous complaints to be submitted through CIMER.

In addition, requests, complaints and suggestions from ILBANK personnel working on the sub-project may be submitted through an internal complaints website or in writing to the ILBANK Personnel Unit. Requests, complaints and suggestions received in this manner are evaluated within 20 working days. The evaluation results are listed internally in the grievance system and accessible by employees via their own intranets.

9.3 Appeal Mechanism

If the complaint is still not resolved, the complainant can escalate/appeal to a higher level of the central Grievance Mechanism within the sub-project. If he/she is not satisfied with the decision, he/she can submit his/her complaint to the relevant court. The grievance mechanism of sub-project workers will not prevent the workers from using any other judicial mechanism.

9.4 GM Communication and Process

Information regarding the sub-project's Grievance Mechanism will be announced as part of the initial feedback interviews with participating stakeholders. Information regarding the Grievance Mechanism will be published online via a brochure in Turkish and on the ILBANK website.

9.5 Monitoring and Reporting of Grievances

The PIU's Grievance Mechanism focal point will be responsible for:

- Resolving complaints regarding the number, content and status of complaints, collecting and analyzing qualitative data from focal points and uploading them to a single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- And submit a report on the grievance mechanisms to the sub-project Coordinator at ILBANK every six months

The reports to be submitted by Kepez Municipality will include a section on the Grievance Mechanism providing updated information on:

- Status of the Grievance Mechanism implementation
- Qualitative data on the number of complaints received/(applications, suggestions, complaints, requests, positive feedback), number of complaints resolved;
- Type of complaints and responses, issues provided and quantitative data on unresolved complaints; and corrective measures taken.

10 CONTRACTOR MANAGEMENT

ILBANK will use the World Bank's 2017 Standard Procurement Documents (SPD) for procurement and contracting, which include labour and occupational, health and safety requirements.

Kepez Municipality will assume primary responsibility for the coordination, implementation, monitoring and reporting of the WB loan application processes. The Liaison Unit located at ILBANK will be responsible for the overall management and supervision of the sub-project, including compliance with the requirements of ESS2 on Labour and Working Conditions outlined in this LMP. The construction contract is signed between Kepez Municipality and the contractor. As part of the process of selecting the contractor to employ subcontracted workers,

ILBANK, Kepez Municipality and/or the supervisory consultant will review the following information:

- Information in official records, such as corporate records and official documents, regarding current labour law violations, including reports from labour inspection agencies and other enforcement agencies;
- Business licenses, registration documents, permits and approvals;
- Information on the labour management system, including OHS issues such as labour management procedures;
- Labour management, determination of safety and health personnel, their qualifications and certifications;
- Certificates/permits/training of workers to perform the required work;
- Safety and health violations and return records;
- Accident and death records and notifications to authorities;
- Records of legally required worker benefits and documentation of workers' enrollment in relevant programs (training records, professional certificates, risk assessments);
- Worker payroll records including hours worked and payments made;
- Identities of safety committee members and meeting records; and
- Copies of previous contracts with contractors and suppliers demonstrating the inclusion of terms and conditions related to ESS2.

Contracts with contractors shall include provisions related to occupational and occupational health and safety, as specified in the World Bank SPD and Turkish legislation. Kepez Municipality will use the World Bank's SPD documents for construction contracts and the contracts will include remedies for non-compliance with labour and other requirements. Remedies should include withholding tax payment, termination of the contract, and cancellation of all or part of the environmental, social, and health and safety performance guarantee.

ILBANK, Kepez Municipality and/or the Audit Consultant will manage and monitor the Contractor's performance with respect to contract workers, focusing on the Contractor's compliance with their contractual agreements (obligations, representations, and warranties), if any. This may include periodic audits, inspections, and/or on-site checks of project locations for subprojects or work sites and/or labour management records and reports collected by the Contractor.

The Contractor's labour management records and reports will include:

- A representative sample of labour contracts or arrangements between third parties and contract workers;
- Records of complaints received and their resolution;
- Reports on safety inspections, including disasters and accidents, and implementation of corrective measures;
- Records on incidents against national law; and
- Records of training provided to contract workers to explain project-related labour and working conditions and OHS.

11 COMMUNITY WORKERS

Community service workers will not be assigned to the sub-project.

12 PRIMARY SUPPLY WORKERS

ILBANK will supervise the construction works process. Project Contractors will be responsible for the procurement and supply of materials and equipment under the same terms and conditions as the contractor contracts regarding EHS. It is not known whether these sectors have significant risks of child labour and forced labour. The tender process will include the submission of declarations such as a Statement of Performance on Forced Labour (covering past performance) and a Statement of Performance on Forced Labour (covering future commitments to prevent, monitor and report any forced labour and transferring these requirements to their subcontractors and suppliers).

In cases where local suppliers are to be engaged, contractors will be required to carry out due diligence procedures to determine whether there are significant risks of suppliers using child or forced labour or exposing workers to serious safety issues.

In cases where contracts are to be made with foreign suppliers, contractors will need to question whether the supplier has met its corporate requirements regarding child labour, forced labour and safety during the procurement process, and whether it has been accused or sanctioned for any of these issues. In the event that any risks related to child labour, forced labour and safety arise, ILBANK will use the SPD documents covering the World Bank's non-compliance resolutions for construction contracts.

REFERENCES

World Bank Environmental and Social Framework Declaration

World Bank Environmental and Social Standard 2 - Labour and Working Conditions Regulation

Turkish Labour Law and related regulations

Turkish Occupational Health and Safety Law and related regulations

Municipal Law No. 5393

ANNEX 1

CONTRACTOR'S CODE OF CONDUCT FOR PERSONNEL

We, as [insert Contractor's name], are Contractors. We have signed a contract with [insert Employer's name] for [insert description of works]. The Works will be carried out at [insert construction site or location where the Works will be carried out]. Our contract obliges us to implement measures to address environmental and social risks associated with the Works, including issues of sexual exploitation, abuse and gender-based violence.

This Code of Conduct is part of our measures to address environmental and social risks associated with the Works. It applies to all of our personnel, workers and other employees at the Worksites and other locations where the Works are carried out. It also applies to subcontractor personnel and all other personnel who support us in carrying out the Works. These individuals are referred to as "Contractor Personnel" and are subject to the Code of Conduct.

This Code of Conduct defines the behaviors we expect from all Contractor Personnel.

Our workplace is a work environment where dangerous, aggressive, abusive and violent behavior will never be tolerated and where all individuals are free to voice their concerns and concerns without fear of reprisal.

MANDATORY CONDUCT

The Contractor's Personnel shall:

1. Perform their duties competently and diligently;
2. Comply with this Code of Conduct and all other applicable laws, regulations and requirements, including those required to protect the health, safety and welfare of other Personnel of the Contractor and all other individuals;
3. Provide a safe working environment, including:
 - a. the safe management of work areas, machinery, equipment and processes under the control of each person without endangering health;
 - b. the use of necessary personal protective equipment;
 - c. the adoption of appropriate precautions against chemical, physical and biological agents and objects;
 - d. the observance of applicable emergency response procedures.
4. Report any working conditions that they consider unsafe or unhealthy and leave a workplace that they consider likely to endanger their life or health;
5. Treat other people with respect and not discriminate against particular groups, such as women, persons with disabilities, migrant workers or children;
6. Not engage in any form of sexual harassment of the Contractor's or the Employer's Personnel, including unwelcome gender-based promotion, sexual solicitation or other unwanted verbal or physical sexual harassment;
7. Not engage in sexual exploitation. Sexual exploitation refers to the abuse of power, position of authority or trust for sexual purposes, including but not limited to the material, social or political gain from the sexual exploitation of another. Sexual exploitation constitutes the access to Goods, Works, Consultancy or Consultancy services or services not requiring Consultancy for sexual gain in projects/studies financed by the Bank.

8. Not engage in sexual abuse. Sexual abuse refers to any attempt at non-consensual sexual contact that does not result in intercourse. Not engage in any form of sexual intercourse with children under the age of 18, except in the context of an existing marriage;

9. Complete relevant training courses on environmental and social aspects of the Convention, including health and safety issues, Sexual Exploitation and Sexual Abuse (SSA);

10. Report violations of the Code of Conduct; and

11. There will be no retaliation against any person who reports violations of the Code of Conduct to us or the Employer or uses the [Subproject Grievance [Redress] Mechanism].

REPORTING PROBLEMS

If any person observes behavior that they believe violates this Code of Conduct or otherwise concerns them, they should immediately raise the issue. This may be done in one of the following ways:

1. Contact [insert name of the Contractor's Social Worker with experience in gender-based violence issues or, if such a person is engaged under the Contract, another person with experience in the relevant areas engaged by the Contractor] at [] or by telephone at [] or in person at []; or

2. Call [] and leave a message to connect to the Contractor's emergency hotline (if any)

The individual's information will be kept confidential unless reporting of allegations is required by local law. Complaints or allegations may be made anonymously, and such complaints will be assessed as appropriate. We take all reports of possible wrongdoing seriously and take appropriate action based on our investigations. We will refer the complaining person to our service providers for assistance as appropriate.

There will be no retaliation against any person who raises a complaint in good faith about any conduct prohibited by this Code of Conduct. Any retaliation will be deemed to have violated this Code of Conduct.

CONSEQUENCES OF VIOLATION OF THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor Personnel may result in serious consequences, including termination of the contract and legal recourse.

FOR CONTRACTOR PERSONNEL:

I have received a copy of this Code of Conduct in a language I understand. I understand that I may contact [Contractor's gender-based violence contact] for clarification regarding any questions I may have regarding this Code of Conduct.

Contractor Personnel Name: [Insert name]

Signature: _____

Date: (day month year): _____


Contractor authorized representative's approval signature:

Signature: _____

Date: (day month year): _____

ANNEX 2


GRIEVANCE FORM

	KEPEZ MUNICIPALITY				
	SOLAR POWER PLANT PROJECT				
GRIEVANCE FORM					
Person Filling Out the Form:			Date and time:		
Inteview Agenda:			Reference No: Kepez Municipality- Project Code-0001-2..		
1. INFORMATION ABOUT THE COMPLAINANT					
Name surname: <i>If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.</i>			How received the Grievance:		
TC Identification number:			Telephone / Toll Free Line <input type="checkbox"/>		
Telephone:			Face to Face Meeting <input type="checkbox"/>		
Address:			Website / Email <input type="checkbox"/>		
Email:			Other (Explain) <input type="checkbox"/>		
Stakeholder Type					
Public <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterpris <input type="checkbox"/>	Trade Associatio <input type="checkbox"/>	NGO <input type="checkbox"/>	
Interest Groups <input type="checkbox"/>	Industrial Assosiaction <input type="checkbox"/>	Labour Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>	
2. DETAILED INFORMATION ABOUT THE GRIEVANCE					
Description of the grievance:					

Solution method requested by the complainant	
Registrant Name Surname/Signature	Complainant Name Surname/Signature

ANNEX 3

GRIEVANCE CLOSURE FORM

	KEPEZ MUNICIPALITY
	SOLAR POWER PLANT PROJECT GRIEVANCE CLOSURE FORM
Reference form:	
1. DETERMINATION OF CORRECTIVE ACTION	
1	<input type="checkbox"/>
2	<input type="checkbox"/>
3	<input type="checkbox"/>
4	<input type="checkbox"/>
5	<input type="checkbox"/>
2. CLOSE OUT THE GRIEVANCE	
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>	
Name Surname / Signature of the Person Closing the Complaint/Date	Name Surname / Signature of Complainant/Date