VERGO ENERJİ SİSTEMLERİ SAN. VE TİC. A.Ş.

COMMUNITY HEALTH, SAFETY AND SECURITY MANAGEMENT PLAN

OCTOBER 2023

CNR-PLN-VRG-CHSSMP-001

(Rev.01)

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LIST OF ABBREVIATIONS/DEFINITIONS

CHSSMP	Community Health, Safety and Security Management Plan
ÇINAR	Çınar Engineering and Consultancy Incorporation
E&S	Environmental and Social
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management Systems
ESS	Environmental and Social Standards
Facility Owner	VERGO Enerji Sistemleri San. Ve Tic. A.Ş. (VERGO)
IFC	International Finance Corporation
KPI	Key Performance Indicator
OHS	Occupational Health and Safety
OIZ	Organized Industrial Zone
PS	Performance Standards
TKYB	Development and Investment Bank of Türkiye
WB	World Bank
WBG	World Bank Group

1. INTRODUCTION

VERGO Enerji Sistemleri San. ve Tic. A.Ş. ("VERGO"), which is one of the companies that produces and exports solar energy systems in Turkey, focuses on the production/manufacturing of solar panel carrier construction systems (steel) and offers design, projecting, production and on-site assembly services in line with the demands of the customers.

VERGO began its operations in 2015 in Organized Industrial Zone (OIZ) of Halilbeyli at Kemalpaşa district, İzmir province with total facility area of 16 decares. After signing the contract (23.12.2020 with no: 2020/0064/0) with Türkiye Kalkınma ve Yatırım Bankası (Development and Investment Bank of Türkiye – "TKYB") and getting the loan for the construction of new facility to be paid back until 22.06.2028, VERGO has purchased the new industrial area (which has total allocated area of 62,494.59 m^2 with 17,817 m^2 closed area) in Salihli Organized Industrial Zone (OIZ)/ Manisa. In January 2021, another consultant firm prepared Management Plans to cover the construction and operation phases of the project.

VERGO fully completed to moving process in August, 2021 from Kemalpaşa, İzmir to Salihli, Manisa. It continues to work in Salihli OIZ with NACE code of 28.99.90. In the facility, the steel rolls are subjected to slitting/cutting, punching (Press Line), bending (by means of press brake and roll form machines) and quality control processes in order to produce pipe&box, profile (C-U) and Wbeam.

Safeguard Corrective Action Plan (SCAP) has been prepared by VERGO upon the request of the World Bank after the successive occupational accidents that occurred within VERGO. In line with the improvements made within the scope of this document, TKYB has requested revision of Environmental and Social Management Plan (ESMP), Occupational Health and Safety (OHS) Management Plan and Emergency Preparedness and Response Plan documents. This situation revealed that other management plans also needed to be updated.

This Community Health, Safety and Security Management Plan (CHSSMP) has been prepared to reflect the current situation of the company as a result of the developments in the company in order to ensure sustainable management of community health and safety issues and to prevent and mitigate/minimize/manage potential environmental, social and community health and safety related impacts associated with the facility's operations. This includes an evaluation in accordance with IFC Performance Standards (PSs), World Bank Group (WBG) General and Sector-specific Environmental Health and Safety (EHS) Guidelines, Good International Industry Practices (GIIP) together with national legislation and TKYB's Environmental and Social Policy. In order to carry out the revisions requested by TKYB, Çınar Engineering Consultancy Inc. (ÇINAR or Consultant) has been appointed as the consultant.

1.1 General Overview

1.1.1 Project Area

The facility is located in the Salihli OIZ, which is within the borders of Manisa Province, Salihli District, Torunlu Neighborhood.

On the other hand, 21,251.75 m^2 of land in the parcel adjacent to the existing facility in Salihli OIZ is allocated to VERGO, and it is planned to establish a Galvanizing Facility in this area that will enable galvanization of steel profile products with a hot-dip coating system. It has been declared that the financing and feasibility of the project has not been clarified yet. In

addition, VERGO is in the process of establishing a new facility that will operate in the production of solar energy panels carrier construction systems in Aliağa district of İzmir province. It was learned that some of the equipment and personnel have been moved to Aliağa. On the other hand, new machines located in S&D Line and Press Line has gotten into act recently in the facility at Salihli OIZ.

Location map of existing and planned facilities is given in Figure 1.

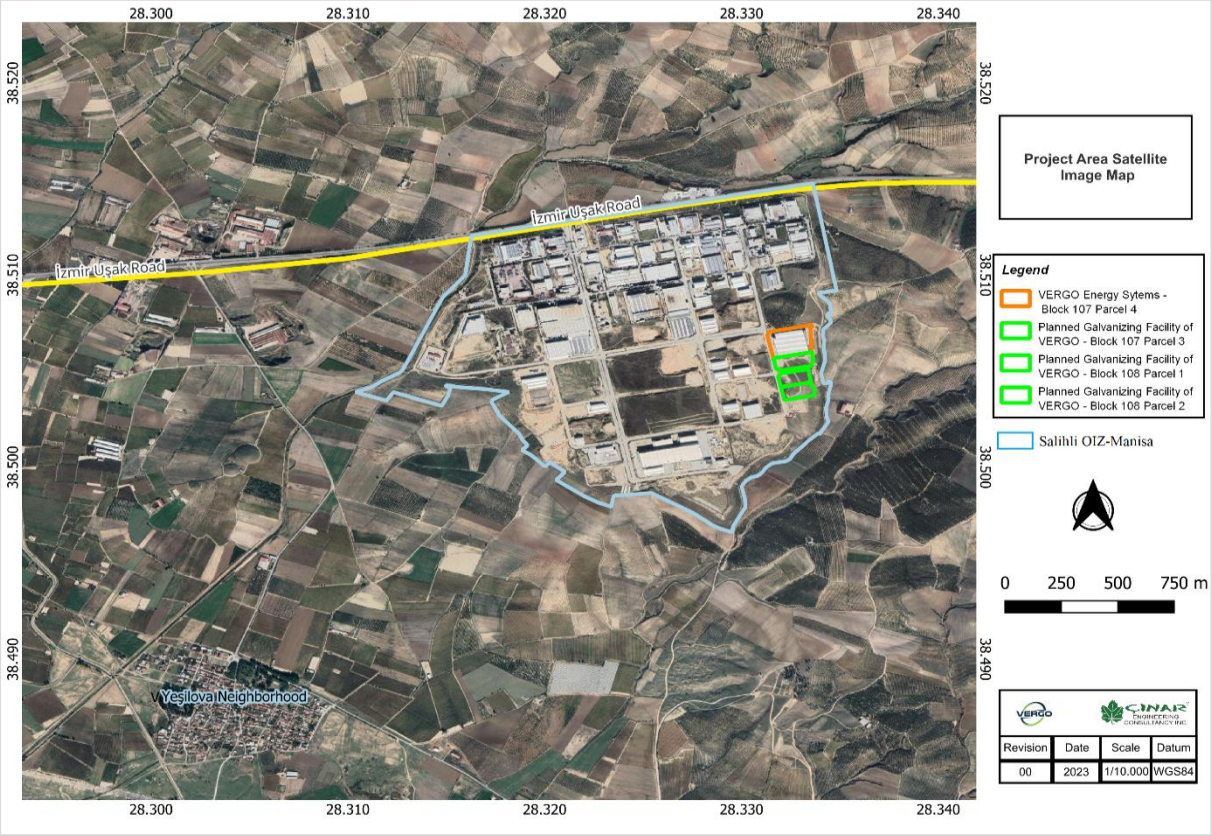

Figure 1. Location of the Existing Facility and Planned Facility in Salihli OIZ

1.1.2 Process Description

According to the Capacity Report prepared on 27.12.2022 and valid until 28.12.2024, VERGO has annual production capacities of:

- 114,716 tons for solar panel connection profile production,
- 86,301.350 tons for solar panel connection profile drilling production,
- 18,909.333 tons for solar panel connection pipe profile spinning and drilling production,
- 2,348.865 tons for PV panel integration and solar structural mechanics manufacturing support structure set (tracking support structure set-2,055 sets/year),
- 17,109.470 tons for PV panel integration and solar structural mechanics manufacturing support structure set (no tracking support structure set-10,627 sets/year),
- 3,616.452 tons for solar power system set (3,164 pcs/year).

Vergo produces solar panel rack systems of Solar Power Plants. The production activities continue along with has 14 Press counters, 5 Roll form counters, 2 Press Brake machines, 1

W-beam (H profile) production line, 1 Pipe plastering and drilling line, 2 saws (one small and one big) and 1 Clamp production line. The raw materials used in the operation phase of the project are as follows:

- Steel Coil Sheet,
- Steel Coil Sheet,
- Aluminum profile,
- Steel Galvanized Pipe,
- Steel Rolled Profile,
- Highcool 1020 BF (Fully Synthetic Coolant),
- ISOLUBE V 73/5 (Solvent-Based Essential Oil),
- PETROGREASE SANUS 150 EP 0 (Grease Oil),
- PETROGREASE FORTIS 254 EP 2 (Grease Oil),
- 16-3601Q Methyl Ethyl Ketone,
- Composite Circle Buckle,
- Composite Circle.

The Production Flow of Press and Roll Form Counters and Press Brake Machine

The steel roll is brought as a raw material into the press counters which is consisted of an opener, a driver and a press. The steel roll is connected to the opener with the help of the operator. Then the steel roll is transferred from the opener by the carrier. The steel roll is taken to the press.

Then the programming of the product is made from the control panel of the machine and the first piece is produced to get the production approval. The control of process is checked by the quality control team. If the semi-finished product receives the approval, the production activity continues. If not, it is intervened and measured again. After intervention and re-measurement, the production activity carries on. After the approved product is completed, it is taken to the storage area for semi-finished products. For the bending process, the roll form or press brake machines are made necessary adjustments. Then the product is brought from the storage area for semi-finished products to the roll form or press brake counter. The product bending process is finished. The bending operation is completed over CANIAS ERP system and the product is sent to the storage area for the shipment.

W-beam Production Line and Pipe Coating Drilling Production Line Process Flow

The raw material, which is brought to the W-beam Line, is loaded into the entrance of the line. All parameters of the relevant commands (slot holes, the measurements of galvanization and grounding holes) are entered in the control panel of the counter. As a result of the commands given from the control panel of the machine, loading magnets support the products into the production line. The raw material is transmitted to the molds with the help of a carrier magnet to punch slot holes. After the slot holes drilled in 2 steps, the output carrier magnet takes the raw material. It transmits to *Punch* for the drilling process of galvanized and / or grounded holes. The ready product is taken from the production line with the help of the exiting magnets. The product completed get the production completion approval via the CANIAS ERP system and sent to the storage area.

Pipe Coating, Drilling Production Line Process Flow

The raw material is brought to the relevant counter. The raw material, is given to the pipe coating and drilling line, is loaded at the entrance of the line. All parameters of the relevant commands are entered in the control panel of the counter. As a result of the commands given from the control panel of the machine; the pipes, which are to be coated, are supplied into the production line. The pipe whose coating process is completed, is transmitted to the

drilling line with the help of the automation-controlled chains. The holes to be drilled in accordance with the technical drawing, is drilled through the punch line then the product is branded. The process controls for the first product are carried out by the line operator and then by the quality control personnel. If approval is given, production starts. If not, it is intervened and re-measured again. After intervention and re-measurement, the production activity carries on. The product completed, gets the production completion approval via the CANIAS ERP system and sent to the storage area.

Following figures summarize the workflow in the facility.

Figure 2. General View of the Workflow

Figure 3. Steel Rolls/Coils as Raw Materials

Figure 4. Slitting Line and Sliced Roll Sheet

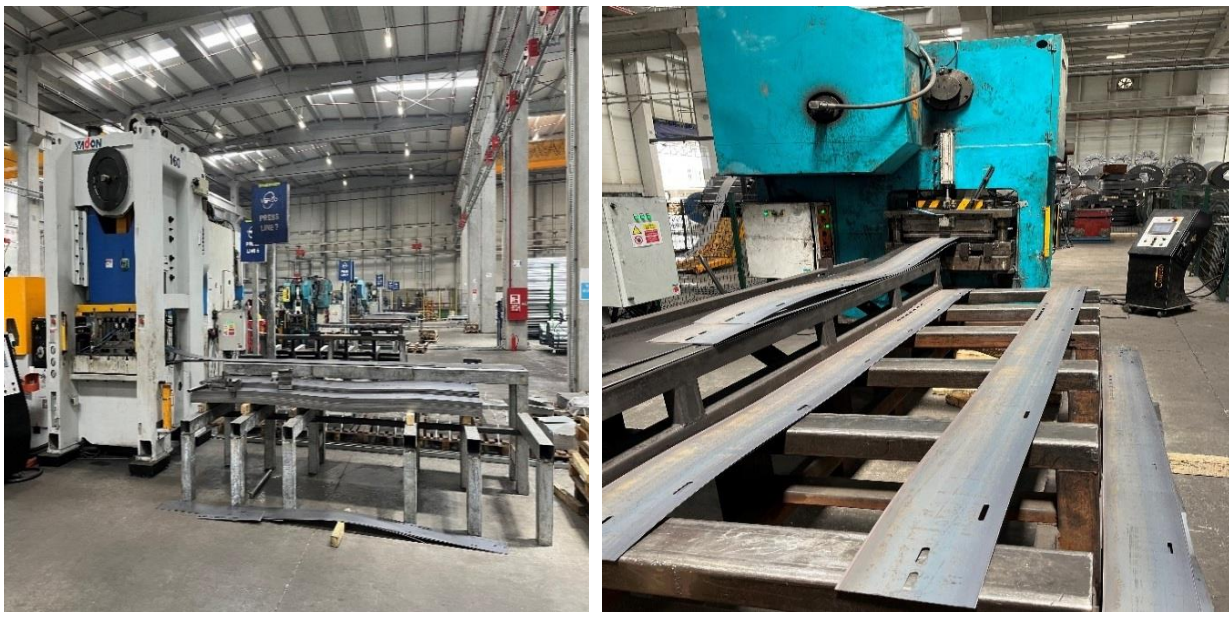

Figure 5. Press Line for Drilling of Sliced Steel Plate

Figure 6. Press Brake and Rollform for Steel Plate Bending

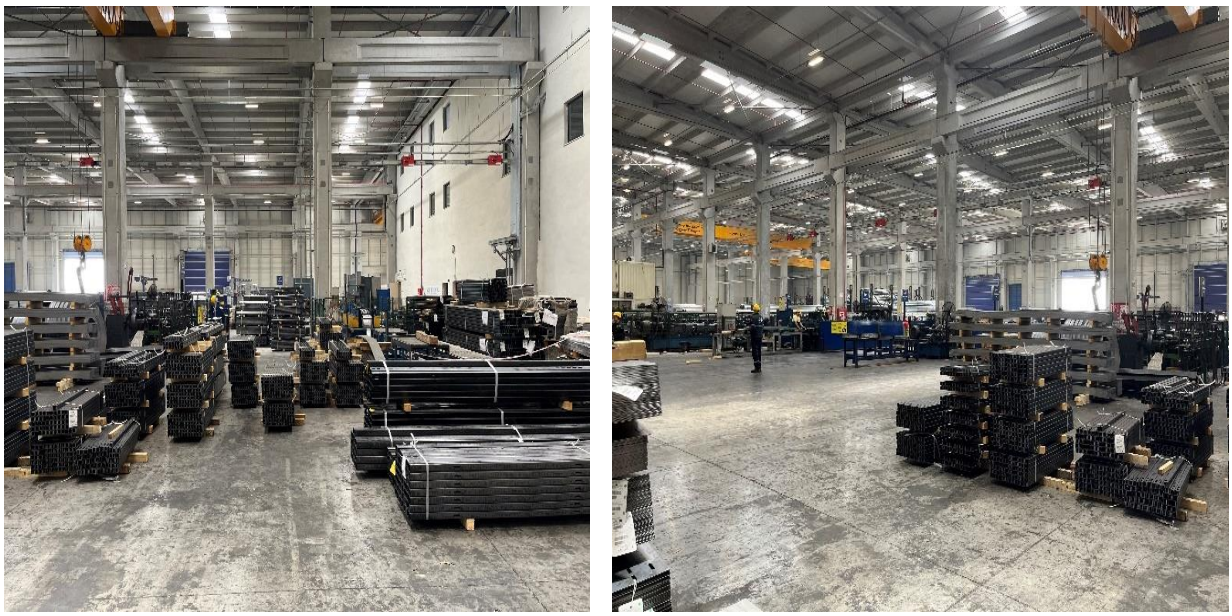

Figure 7. Intermediate Product Storage

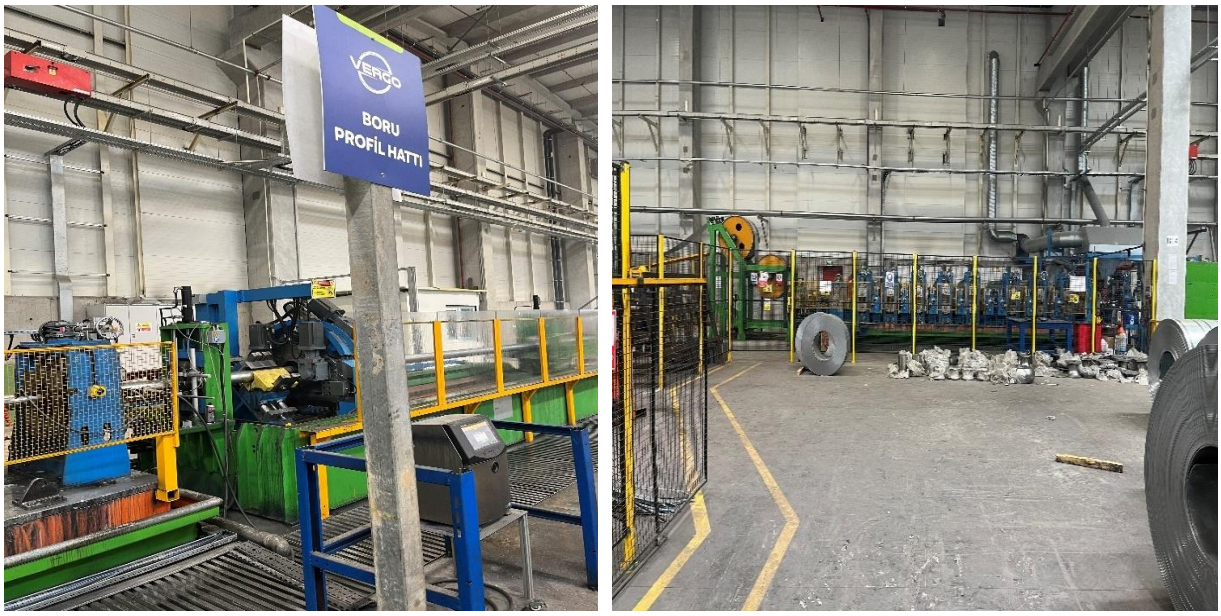

Figure 8. Pipe Profile Production Line

Figure 9. S&D Line for Spinning and Drilling of Pipes

Figure 10. Chamfering Line for Pipes

Figure 11. Final Products Ready for Shipment

1.2 Objectives and Scope

The Community Health, Safety and Security Management Plan (CHSSMP) has been prepared to manage the community health and safety impacts arising from project activities in accordance with Project Standards. Specifically, the objectives of this plan are:

- To identify community health, safety and security risks and impacts that may arise from project activities.
- To define the principles and guidelines for community health, safety and security management to be followed during project activities.
- To define relevant Project Standards, including national regulatory requirements.
- To determine roles and responsibilities within the scope of the plan.
- To define monitoring and reporting procedures, including Key Performance Indicators.
- To identify training requirements.

The measures, practices, managerial actions, and implementations provided in this plan are applicable to all Facility personnel, subcontractors and service providers' personnel, and visitors accordingly.

The CHSSMP is comprised of a combination of "Project Standards," which includes the IFC Performance Standards, national legislation/regulatory frameworks, WBG General and Sectoral EHS Guidelines, good international industry practices currently in use, and TKYB's Environment and Social Policies. It defines roles and responsibilities for plan implementation, impact-reducing measures, and managerial actions related to air quality managements, as well as monitoring, reporting, and training requirements. This Plan has been prepared for the facility during the operation period.

The CHSSMP should be evaluated in an integrated manner with other relevant management plans/procedures prepared within the scope of the Project.

1.3 Applicable Environmental and Social Standards

1.3.1 National Legislation

The regulations that come into prominence in the project management, especially contained within the Environment Law No. 2872, the Labor Law No. 4857, the OHS Law No. 6331, the OIZ Law No. 4562, the Law on Right to Information (No. 4982) and the Public Health Law No. 1593 are summarized below.

Table 1. Prominent Regulations Covered by National Legislation

Regulation	Official Gazette Date	Official Gazette Number
Regulation on Environmental Impact Assessment	29.07.2022	31907
Regulation on Environmental Permit and License	10.09.2014	29115
Regulation on Organized Industrial Zones Implementation	02.02.2019	30674
WASTES		
Regulation on Waste Management	02.04.2015	29314
Regulation on Waste Oil Management	21.12.2019	30985
Regulation on Packaging Waste Control	26.06.2021	31523
Regulation on Landfilling of Wastes	26.03.2010	27533
Regulation on Control of Waste Vegetable Oils	06.06.2015	29378
Regulation on Control of Waste Batteries and Accumulators	31.08.2004	25569
Regulation on Control of End-of-Life Tires	25.11.2006	26357
Regulation on Zero Waste	12.07.2019	30829
Regulation on Control of Medical Wastes	25.01.2017	29959
AIR		
Regulation on Industrial Air Pollution Control	03.07.2009	27277
Regulation on Air Quality Assessment and Management	06.06.2008	26898
Regulation on the Monitoring of Greenhouse Gas Emissions	17.05.2014	29003
Regulation on Exhaust Gas Emission Control	11.03.2017	30004
SOIL		
Regulation on Control of Soil Pollution and Point Source Contaminated Sites	08.06.2010	27605
NOISE		
Regulation on Environmental Noise Control	30.11.2022	32029
WATER		
Regulation on Water Pollution Control	31.12.2004	25687
Regulation on Surface Water Quality	30.11.2012	28483
Regulation on the Quality and Treatment of Drinking Water Supply	06.07.2019	30823
Regulation on Water Intended for Human Consumption	17.02.2005	25730
Regulation on the Protection of Groundwater against Pollution and Deterioration	07.04.2012	28257
Regulation on the Procedures and Principles to be Followed in Determining the Tariffs of Wastewater Infrastructure and Domestic Solid Waste Disposal Facilities	27.10.2010	27742
OHS		
Regulation on Occupational Health and Safety Risk Assessment	29.12.2012	28512

Regulation	Official Gazette Date	Official Gazette Number
Regulation on Emergencies at Workplaces	18.06.2013	28681
Regulation on Occupational Health and Safety Services	29.12.2012	28512
Regulation on Health and Safety Conditions in the Use of Work Equipment	25.04.2013	28628
Regulation on Health and Safety Signs	11.09.2013	28762
Regulation on Occupational Hygiene Measurement, Test and Analysis	27.01.2023	32086
Regulation on the Vocational Training of Persons to be Employed in the Hazardous and Very Hazardous Classes	13.07.2013	28706
Regulation on Duties, Authorities, Responsibilities and Trainings of Occupational Physicians and Other Health Personnel	20.07.2013	28713
Regulation on the Procedures and Principles of Employing Child and Young Workers	06.04.2004	25425
Regulation on Preventing Major Industrial Accidents and Reducing Their Effects	02.03.2019	30702
Regulation on Contractors and Sub-contractors	27.09.2008	27010
Regulation on the Transport of Dangerous Goods by Road	18.06.2022	31870

1.3.2 International Standards

Since the TKYB is the lender, the activities of the facility must be in compliance with good international industrial practices including IFC PSs, WBG EHS Guidelines, TKYB's E&S Policy and best practices documents alongside the National EHS Legislation.

IFC has established Environmental and Social Performance Standards to define its customers' responsibilities for managing their environmental and social risks. During the investment and operation periods, the borrower must comply with these standards. IFC Performance Standards (2012) ("IFC PSs") are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution prevention
- PS4: Community Health, Safety, and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Biodiversity Conservation and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

Moreover, in August 2016, the new environmental and social policies called the Environmental and Social Framework (ESF) has been adopted by the World Bank. The ESF enhances the World Bank's commitment to sustainable development through ten (10) Environmental and Social Standards (ESSs) that are designed to support Borrowers' E&S risk management. The ESF enables Borrowers to better manage project risks as well as improve environmental and social performance, consistent with good international practices[1]. The ESSs, which are similar with the IFC's PSs, are listed below:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS2: Labor and Working Conditions

1 Environmental and Social Framework, retriewed 07.06.2023 from the official web site of the World Bank https://www.worldbank.org/en/projects-operations/environmental-and-social-framework

- ESS3: Resource Efficiency and Pollution Prevention and Management
- ESS4: Community Health and Safety
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS8: Cultural Heritage
- ESS9: Financial Intermediaries
- ESS10: Stakeholder Engagement and Information Disclosure

Other guidelines and principles are as follows:

- WBG General EHS Guidelines (2007)
- WBG EHS Guidelines: Metal Plastic and Rubber Products Manufacturing (2007)
- Equator Principles IV (2020).

Moreover, TKYB announced its perspective on the continuation of environmental and social sustainability and reducing and managing the negative effects and risks arising from its activities, with the TKYB Environment and Social Policy dated January 2020. The policy is based on this policy in all services and activities financed by the Bank. In addition, the “Environmental and Social Risk Assessment Procedure in the Lending Process”, which was prepared to evaluate the environmental and social risks of the requested loans and to ensure that the issue is managed effectively in line with the Bank's strategy, is applied for each project.

2. ROLES AND RESPONSIBILITIES

The general organizational structure for Implementation of the Plan is shown as follows.

Table 2. General Organization Structure for Implementation of the Plan

Roles	Responsibilities
General Manager	•Ensuring that the necessary resources are provided for the successful implementation of this plan, •Taking primary responsibility for ensuring that every action required for implementation of the plan in accordance with project activities, and •Following up the implementation of this plan at the administrative level.
Facility Manager	•In collaboration with the General Manager, provides adequate resources for implementation of this plan, •Ensures implementation of this Plan in accordance with Project Standards, •Ensures provision of relevant trainings within the scope of this plan, •Ensures review and update of this plan as required, and •Ensures compliance of subcontractors and service providers to this Plan's requirements.
Human Resources Department	•Ensure that all workers, participate in training sessions. Maintain a record of training and conduct of awareness sessions for staff to ensure compliance with environmental and safety commitments stated in the Plan, •Recording and addressing internal and external complaints, •Work in coordination with EHS Specialists, •Ensure that all site staff, including Sub-Contractors are aware of the requirements of this CHSSMP and that all activities conducted are in compliance with Project Standards, •Govern the execution of CHSSMP and make necessary revisions on an annual basis, •Report all community safety issues to the Facility Manager, •Organize the community awareness activities, •Follow procedures related to community safety for site-specific issues, •Review the compliance of all related laws and regulations by following up community related KPIs.
Quality Engineer for Environmental, Health, and Safety **Environmental Officer**	•Implements this Plan in tandem with HR department and updates it whenever necessary, •Ensures Facility operations are carried out in accordance with this Plan's requirements, •Ensures realization of the management related audits / controls, identification of possible shortcomings / non-compliances, and implementation of relevant corrective actions, •Controls and audits the compliance of subcontractors and service providers to this Plan's requirements, •Keeps all kinds of records relevant to this Plan, •Follows legislative requirements applicable to this Plan, •Ensures realization of monitoring requirements of this Plan, •Provides and/or arrange provision of trainings within the scope of this Plan. •Searches the causes of the social incidents that cause; injuries, delays, or stoppage in the work and disputes the Facility and communities, •Monitors all grievances and ensure that all complaints are resolved and closed,

Roles	Responsibilities
	•Follow up community related KPIs, •Follow procedures related to community safety for site-specific issues, •Review the CHSMP and make necessary revisions on an annual basis.
Project Workers	•Participate relevant trainings designated for them in this Plan, •Follow related precautions and rules, and •Report shortcomings / non-compliances / risky situations related with CHSS management to their supervisors.

3. MANAGEMENT OF COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

It should be note that the Facility is located within the boundaries of an Organized Industrial Zone (OIZ), and therefore, certain matters pertaining to the management of the identified community health, safety and safety impacts will be addressed jointly with the OIZ administration. In such cases, VERGO's utmost responsibility will be to exert maximum effort in the pursuit and execution of any corrective or preventive actions to be conveyed to or requested from the OIZ management.

The Facility Owner identified the following potential Community Health, Safety and Security impacts due to the operational activities of the Project:

- Traffic increase throughout Salihli Organized Industrial Zone,
- Impacts of the emissions on air quality,
- Impacts on water resources,
- Introduction of new security presence and security personnel,
- Risks associated with hazardous waste management,
- Labor influx.

In line with this, adverse effects that may arise from Project activities on community health, safety and security, as well as the measures to be taken for their management, are outlined in the table below.

Table 3. Management of Community Health, Safety and Security

Subject / Scope	Impact / Risk Description	Precaution / Administrative Action
Traffic and Road Safety	The community health, safety and security risks associated with traffic generated by the project (employee commuting to and from the Facility, transportation of products and raw materials, etc.) include the potential for accidents or incidents to occur	• Priority should be given to routes that are distant from residential areas for commuting to and from the Facility, • Regular vehicle inspections, in accordance with national regulations, should not be neglected, • In addition to mandatory periodic inspections, visual checks should be conducted before and after vehicle use, • Unless in unavoidable circumstances (e.g., road closures due to traffic), vehicles should be prohibited from deviating from designated routes, • When passing through residential areas, the specified speed limits for all vehicles used within the Project should be enforced, • Adherence to national speed limits on highways should be ensured, • Vehicle drivers should receive training as defined by national legislation and Project Standards, possess appropriate licenses and certifications, and these processes should be monitored, • Ensure that drivers from supplier and subcontractor companies have the necessary licenses and training for the vehicles they operate, as well as for transporting raw materials and other auxiliary materials, if applicable, • Implement the requirements of the Emergency Preparedness and Response Plan, • Effectively implement the Grievance Redress

Subject / Scope	Impact / Risk Description	Precaution / Administrative Action
		Mechanism.
Air Emissions	Possible effects of project-related air emissions on community health and safety	• Implementation of the Air Quality Management Plan and Environmental and Social Management Plan. • Periodically conduct emission measurement reports, monitor compliance with national legislation and international standards regarding exhaust gas emission concentrations/mass flows, and take necessary preventive and corrective actions in case of exceeding limit values, • In case of complaints related to issues such as dust and exhaust emissions from nearby residential areas due to project activities, contact the OIZ Administration to address the matter and take necessary corrective actions that can be applied across the entire OIZ, • Unless in unavoidable circumstances (e.g., road closures due to traffic), prohibit vehicles from deviating from designated routes, • Enforce the specified speed limits for all vehicles used within the Project when passing through residential areas, • Ensure that drivers from supplier and subcontractor companies have the necessary licenses and training for the vehicles they operate, as well as for transporting raw materials and other auxiliary materials, if applicable.
Water resources and wastewater	Polluting effects on surface water and groundwater due to Project activities and Project-related water use	• Implementation of the requirements of the Environmental and Social Management Plan, Waste and Wastewater Management Plan and Emergency Preparedness and Response Plan.
Emergencies	Project-related emergencies (such as fire, explosion, traffic accident, etc.) that may affect local communities.	• Implementation of Emergency Preparedness and Response Plan requirements.

Security Personnel	Problems that may arise from the attitudes and behaviors of security personnel in their interactions with residents of surrounding settlements	• Verify that individuals responsible for security have not been involved in any past misconduct.
		• Ensure that security personnel operate in compliance with relevant regulations and international standards.
		• Evaluate and investigate all allegations of illegal or abusive actions by security personnel, take appropriate actions to prevent recurrence (or encourage relevant parties to take action), and report any illegal or abusive activities to the appropriate public authorities.
		• Confirm that security personnel have received training in the following areas:
		  ○ Safety awareness regarding healthy working conditions and health and safety regulations.
		  ○ Introduction to the job and the work environment, policies, and practices, including organizational structure and the company's mission, vision, values, and goals.
		  ○ Use of force (and, where applicable, firearms).
		  ○ Appropriate behavior towards employees and

Subject / Scope	Impact / Risk Description	Precaution / Administrative Action
		communities. ○ Human rights.
Hazardous Waste Management	The risks associated with hazardous materials used during the production phase and during their transportation to the site by relevant suppliers and within the project area, can have acute effects such as fires, explosions, and other emergencies, as well as indirect impacts like leaks and spills that could affect community health, safety and security	• Collected and stored hazardous wastes separately in properly designed and constructed temporary waste storage area to prevent any leakage to soil and groundwater, • Secondary containment and/or spill kits will be provided for the storage containers at the site, • Disposal of hazardous waste will be undertaken by authorized companies, • Implement Waste Management Plan and Environmental and Social Management Plan, • Ensure that contractors and service providers supplying hazardous materials and chemicals comply with the requirements of the Regulation on the Road Transportation of Dangerous Goods.
Labor Influx	Risks caused by labor flux	• Implement Grievance Redress Mechanism, • Provide cultural awareness trainings, • Include awareness rising of the prevention and treatment of communicable diseases. • Provision of onsite health care, to ensure that medical attention can be provided for a worker who present with symptoms of a communicable diseases.

4. TRAINING

Within the scope of this Plan, the following trainings will be provided:

- Trainings for parties responsible for roles and responsibilities related to the implementation of the Plan.
- Trainings for all personnel regarding the mitigation measures and administrative actions mentioned in this Plan.
- Trainings for security personnel as specified in Section 3 will be provided and/or ensured.
- Trainings for all Project personnel to explain potential impacts and risks of the Project on community health, safety and security.

5. MONITORING ACTIVITIES

In order to ensure the effectiveness of the implementation of this plan, regular monitoring and inspection activities will be conducted. Table 4 presents monitoring activities and associated performance indicators related to the facility's CHSS management topics.

Table 4. Monitoring Activities

No	Necessity	Period	Monitoring Responsibility	Responsibility to Perform
CHSSMP-01	Closure of non-compliances related to the requirements mentioned in this plan	Monthly	Quality Engineer for Environmental, Health, and Safety HR Department Facility Manager	Project Owner
CHSSMP-02	Ensuring necessary participation in training related to the plan	Quarterly	Quality Engineer for Environmental, Health, and Safety HR Department Facility Manager	Project Owner
CHSSMP-03	Addressing internal and external complaints related to the plan	Continuously	Quality Engineer for Environmental, Health, and Safety HR Department Facility Manager	Project Owner
CHSSMP-04	Ensuring that security personnel maintain appropriate interactions with the local community	Continuously	HR Department Facility Manager	Project Owner
CHSSMP-05	Compliance of suppliers and service providers with project standards regarding the supply of hazardous substances and chemicals	Continuously	Quality Engineer for Environmental, Health, and Safety Facility Manager	Project Owner

5.1 Key Performance Indicators

Key Performance Indicators (KPIs) related to findings from the monitoring activities for prevention and minimization of environmental and community health, safety and security related impacts are provided in Table 5.

Table 5. Key Performance Indicators

No	Topic/KPI	Target	Monitoring Method
CHSSMP-KPI-01	Number of non-compliances related to the requirements mentioned in this plan	Periodic monthly decrease in the number of non-compliances	Monitoring records
CHSSMP-KPI -02	Participation rate in training related to the plan	100%	Training records
CHSSMP-KPI -03	Number of complaints related to CHSS	Periodic decrease in the number of complaints every 3 months	Grievance records

6. REPORTING

Following the internal monitoring activities, the reports/documents prepared by the Project Owner will be reviewed and evaluated within the scope of Environmental and Social Monitoring Studies by the Environmental Consulting Firm approved by TKYB. Subsequently, reporting to the Bank will be carried out at the intervals specified in ESAP based on the topics mentioned in Section 5.

7. REVIEW AND UPDATE

This Community Health, Safety and Security Management Plan is a living document and will be updated as needed in accordance with changes in national legislation and international standards, changes in the project's processes/capacity, content of complaints and any other potential changes related to activities of the project. Updates will be carried out in compliance with Project Standards.