

SCHEDULE 1 – ENVIRONMENTAL AND SOCIAL ACTION PLAN-Updated in July 2020

Ref.	Actions Required	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs/ Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
1	Assessment and Management of Environmental and Social Impacts and Issues					
	<ul style="list-style-type: none"> Main Construction Contractor to develop and implement an environmental and health and safety management system in line with the requirements of ISO 14001 and OHSAS 18001 (ISO 45001:2018) standard including a detailed organizational structure The contractor should develop and implement a specific environmental risk assessment procedure in order to prevent or minimize the impacts of potential risks The contractor shall revise organisation chart to reflect the up-to-date HSE and social resources 	Optimization of environmental and social management system, identification of HSE and permitting risks	EBRD PR1	Main Construction Contractor, Own resources, external consultants (if required)	Prior to construction (after construction contractor is selected)	<ul style="list-style-type: none"> EHS Policy and all relevant EHS plans and procedures in place Organizational structure in place Annual Reports to EBRD
1.2	<p>Main construction contractor:</p> <ul style="list-style-type: none"> Establish a strong HSE team within the main construction contractor including an experienced Environmental Manager and a Health and Safety Manager with clearly defined roles and responsibilities, and authority <p>IMM:</p> <ul style="list-style-type: none"> Resource IMM to monitor the implementation of Environmental, OHS and social requirements by the main construction contractor 	Effective management of EHS risks Compliance with national legislations and Bank PRs.	EBRD PR1 National Laws	Main Construction Contractor - Own resources IMM - Own resources	Prior to construction Regular monitoring by IMM during construction	<ul style="list-style-type: none"> For construction contractor: organizational structure with defined roles and responsibilities For IMM: Revised organizational structure with defined roles and responsibilities
1.3	<ul style="list-style-type: none"> Develop and implement an environmental monitoring programme by the main construction contractor covering: <ul style="list-style-type: none"> Air emissions monitoring at sites of large excavation activities and excavated material transport Noise and vibration monitoring at construction sites Identify and implement mitigation measures as appropriate based on complaints and feedback received from stakeholders including but not limited to; <ul style="list-style-type: none"> Environmental dust monitoring to be performed for two seasons in order to understand the situation in dry and windy weather conditions Local meteorological conditions (wind speed and direction, rainfall, relative humidity at least) are recommended to be monitored and recorded on a daily basis to take information on when any exposed areas may be at a higher risk for dust. Daily inspections of the construction activities to ensure that the dust mitigation measures are implemented. The inspection results should be recorded and in case of any non-compliance, corrective actions should be determined and implemented urgently. 	Dust prevention Decreased nuisance for the community	EBRD PR1 EBRD PR3 Industrial Air Pollution Control Regulation Environmental Noise Control Regulation	Own resources, external consultants / Main Construction Contractor	Prior to/during construction	<ul style="list-style-type: none"> Dust measurement testing results Noise and vibration monitoring testing results Air Quality Management Plan specific for the Project Noise and Vibration Management Plan
1.4	<ul style="list-style-type: none"> Prepare Traffic Circulation Projects related to traffic diversions and have them approved by relevant authorities Develop and implement a robust traffic management plan for the construction sites Community Awareness raising/training activities on traffic risks to be planned and conducted for the communities in the vicinity of the construction sites. The contractor shall provide the district municipalities, headmen, NGOs and the public with information on traffic risks and measures with brochures and presentations in schools on regular basis. 	Aligning impact assessment to acceptable standards	EBRD PR1	Own resources, external consultants / IMM Main Construction Contractor	Prior to/during construction as needed	<ul style="list-style-type: none"> Approved Traffic Circulation Projects Traffic management plan Community awareness camping

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1.5	<ul style="list-style-type: none"> • Prepare and implement an environmental and social management plan (ESMP) for the construction activities. • Develop the following management plans to support the ESMP: <ul style="list-style-type: none"> ○ Air quality management plan ○ Waste management plan ○ Noise and vibration management plan ○ Traffic management plan ○ Hazardous material management plan ○ Surface water management plan ○ Chance find procedure • Both IMM and the Contractor should set targets and performance indicators (KPIs) and start effective monitoring of the performance based on these KPIs. • The control forms/lists provided in the Occupational Health, Safety and Environmental Management Plan should be regularly filled in during the controls/audits so that each control date/ actions can be clearly understood. • For noise monitoring- the contractor should; <ul style="list-style-type: none"> - Identify sensitive receptors, - Conduct environmental noise and vibration monitoring in accordance with the Contractor's management plan. - In case of any exceedance of the limits or baseline data; review and implement mitigation measures, - Record the data in the forms given in the management plan. 	Management of ES impacts and risks	EBRD PR1 National legislation	Own resources, external consultants / Main Construction Contractor	Prior to construction	<ul style="list-style-type: none"> • ESMP in place for the Project and implemented • Plans in place and implemented • HSES targets and KPIs
1.6	<ul style="list-style-type: none"> • IMM to develop a Contractor monitoring programme (including developing an Environmental and OHS audit team) to increase their oversight of Main Construction Contractor's activities (including the subcontractors of Main Construction Contractor) and keep relevant records in terms of health and safety implementation • Main Construction Contractor to develop and implement a Subcontractor Management Plan 	Avoid unregistered /migrant workers on-site Prevention of child/forced labour Prevention of accidents Avoid conflicts and legal cases	EBRD PR1 EBRD PR4 Occupational Health and Safety Law No. 6331	Own resources, external consultants / IMM Own resources, external consultants /Main Construction Contractor	Within 3 months after loan signing Prior to/during construction	<ul style="list-style-type: none"> • Contractor Management Programme • Regular EHS and social monitoring on contractors and sub-contractors • Subcontractor Management Plan
1.7	<ul style="list-style-type: none"> • Main Construction Contractor and IM to develop clear and comprehensive procedure for supply-chain management (within the scope of Environmental, Health and Safety Management System) to define regular controlling tools and follow up actions (including all supply-chain). 	Optimization of environmental and social management	EBRD PR1	Own resources, external consultants / Main Construction Contractor and IM	Prior to construction Within 6 months after loan signing for IM	<ul style="list-style-type: none"> • Procedure on supply chain management
2	Labour and Working Conditions					
2.1	<ul style="list-style-type: none"> • Develop an HR Policy and a Personnel Regulation Procedure for the main Construction Contractor which defines key employee rights in line with national laws and PR 2 requirements that include but not limited to: <ul style="list-style-type: none"> ○ Grievance resolution, ○ Worker engagement, ○ Workers organisations/trade unions ○ Non-discrimination and equal opportunity ○ Retrenchment ○ Disciplinary procedures ○ Collective Agreement ○ Equal pay for equal work ○ Gender Equality ○ Bullying and harassment, including sexual harassment ○ Child labour and forced labour ○ Overtime ○ Working hours ○ Work-life balance ○ Wages, benefits, and conditions of work and accommodation ○ Social security of permanent and temporary employees • Main construction contractor to communicate the HR procedures and policies to all its employees. • Main construction contractor to ensure that Company's HR standards are adopted by its subcontractors. It is recommended to provide a handbook (including explanation of a grievance mechanism) for all workers including subcontracted employees to inform them at the time of hiring • The IMM and Contractor shall encourage and promote employment of women and track employment information 	Improved human resources practices and compliance with National legislations and PR2 requirements	EBRD PR2 National Labour Law	Own resources of Main Construction Contractor	Prior to/during construction	<ul style="list-style-type: none"> • HR Policy/ Personnel Regulation Procedure of Main Construction Contractor and its sub-contractors

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2.2	<ul style="list-style-type: none"> Develop and maintain employee records/documentation of Main Construction Contractor and its subcontractors in line with the legislation including but limited to: <ul style="list-style-type: none"> Provide copy of the signed employee contract to the workers Define the termination dates on the worker contracts Keep the H&S records of workers in line with the legislation Establish a work schedule for Main Construction Contractor workers in compliance with the Turkish Labour Laws and PR 2 requirements Establish a systematic time recording system for workers of Main Construction Contractor and its subcontractors 	Improved human resources practices and compliance with National legislations and PR2 requirements	EBRD PR2 National legislations	Own resources of Main Construction Contractor, IMM to monitor	Prior to/during construction	<ul style="list-style-type: none"> Employee Contracts in line with legislation Share copy of the signed employee contract with each worker Work hour schedule in line with Labour Laws Time recording system in place
2.3	Main Construction Contractor to assign a HR team to the project to ensure that all labour practices are in line with labour laws and regulations.	Improved human resources practices and compliance with National legislations and PR2 requirements	EBRD PR2 National legislations	Own resources of Main Construction Company, IMM to monitor	Prior to construction	<ul style="list-style-type: none"> Organizational chart of HR team Annual report to EBRD
2.4	<ul style="list-style-type: none"> Ensure that all national and non-national construction workers (i.e. Syrian refugees and or Chinese technicians) have obtained work permits. Ensure that non-national construction workers are paid and treated equally and provided with the same social welfare package 	Non-discriminatory HR policy Compliance with labour law and PR 2 requirements	National laws and PR 2 requirements	Own resources of Main Construction Contractor, IMM to monitor	Prior to/during construction	<ul style="list-style-type: none"> Work permits in place for non-national workers Annual Reports to EBRD
2.5	Conduct an independent labour audit every quarter at each site during construction, checking all the employment documentation in place, ensure that wages and social security records are in line with regulations for all workers, compliance of contractors and subcontractors against legislation and PR 2 and 4 OHS requirements as well as actions taken to address identified issues and compile the record	Effective management of labour/OHS risks	EBRD PR 2 National Legislations	Main Construction Contractor own resources and external consultants if needed IMM to monitor	Every quarter throughout the construction	<ul style="list-style-type: none"> Compile quarterly independent labour audit report and action plan and outcomes Annual Report to EBRD
2.6	<p>Ensure that the contractors accommodation camps, dormitory conditions are in line with IFC/EBRD _Workers' accommodation; process and standards (http://www.ebrd.com/downloads/about/sustainability/Workers_accommodation.pdf). Issues to address but not limited to:</p> <ul style="list-style-type: none"> Provision of sufficient hot water at worker camps Cleaning schedule for toilets and showers Regular control of first-aid kits at camps; Ensure presence of adequate number of first-aid trained employee at all construction sites and worker camps Emergency exist and emergency lights to be provided at the emergency exits in all accommodation camps. Provision of adequate heating in the rooms. Provision of adequate number of washing machine and drying units at each camp location Conduct drinking water analysis on regular basis at camps Non-conformities identified during monitoring of the camps should only be closed after provision of sufficient evidences. These evidences should be properly documented. 	Improved human resources practices and compliance with National legislation and PR2 requirements	EBRD PR2 EBRD/IFC Worker accommodation s guidance National legislation Turkish Labor Law No: 4857	Own resources Main Construction Contractor, IMM to monitor	Prior to construction	<ul style="list-style-type: none"> Worker accommodation camps are developed in line with IFC/EBRD - Workers' accommodation standards
2.7	<p>Ensure that the main Construction Contractor to implement the following actions:</p> <ul style="list-style-type: none"> Establish and implement a "formal employee grievance mechanism" for all direct and sub-contracted employees and provide them information on channels for internal communication and raising grievances. The workers should be informed of the mechanism and procedures at the time of hire in their local language. As a best practice, options of anonymous grievance mechanism should be established to encourage concerns to be raised freely. Place suggestion boxes at each construction site, namely at the entrance of a main building within each construction site and/or at a canteen area where workers may easily access. Develop a detailed disciplinary procedure and disciplinary committee constituted to analyse/decide disciplinary actions properly The Contractor shall prepare a toolbox talk regarding the grievance mechanism of employees/workers, and develop methods for encouraging the employees/workers to use the system. 	Improved employee/contractor relationship and management Improved grievance mechanism and prevention of conflicts	EBRD PR2 National legislations Turkish Labor Law No: 4857	Own resources of Main Construction Contractor, IMM to monitor	During construction	<ul style="list-style-type: none"> Announcement of the employee grievance procedure Keeping records of complaints/suggestions Regular evaluation of complaints/ suggestions Provide regular feedback to employees Employee interviews

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2.8	<ul style="list-style-type: none"> IM to develop a dismissal procedure for collective dismissals in accordance with the provisions of national law and applicable collective agreements and should carry out an analysis of alternatives to retrenchment. If no viable alternatives are identified, IM to develop a retrenchment plan for carrying out redundancies which should include measures to reduce and mitigate the adverse impacts of retrenchment on workers. IM to ensure the following issues: <ul style="list-style-type: none"> to commit to consulting with trade unions or other workplace representatives over the proposed redundancies and to reflect the outcome of the consultation in the final retrenchment plan. to ensure that the criteria for selection are objective, fair and transparent; to implement a procedure which provides individuals with the right to challenge their selection; and to commit to paying all outstanding back pay and social security benefits and pension contributions and benefits in a timely manner. to notify EBRD one month in advance of the implementation of all redundancies covered by PR 2 and, in the case of large scale redundancies, also to provide EBRD with a copy of the retrenchment plan in advance of dismissals. 	Management of collective dismissals	EBRD PR2 National legislations	Own resources/external consultants of IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Dismissal Procedure Retrenchment Plan in case of collective dismissals Notification to EBRD minimum 30 days prior to collective dismissals
2.9	<ul style="list-style-type: none"> Provide training to security personnel on conflict resolution, crowd management, restraint and cautious exercise of the security activity, proportional use of force (if allowed) and basics of human rights. 	Conflict resolution/crowd management	EBRD PR2	Own resources/external consultants of Main Construction Contractor and IM	Prior to/during construction During operation	<ul style="list-style-type: none"> Training records
3	Resource Efficiency and Pollution Prevention and Control					
3.1	<p>Main Construction Contractor:</p> <ul style="list-style-type: none"> Main Construction Contractor to obtain permits for: <ul style="list-style-type: none"> disposal of excavated materials Wastewater connection permits at construction sites from IZSU Necessary approvals from IZSU related to creek crossings <p>IM:</p> <ul style="list-style-type: none"> Obtain an opinion letter from PDEU to confirm the status of IM with respect to the applicability of the "Regulation on Environmental Permit and License" Clarify whether Regulation on Soil Pollution Control and Point-Source Contaminated Sites (RSPC) is applicable to IM facilities performing repair and maintenance and fill out the Activity Preliminary Information Sheet as per the RSPC, if required 	Compliance with Turkish legislation	EBRD PR1 EBRD PR3 EBRD PR4 Turkish Regulation on Control of Excavated Soil, Construction and Demolition Wastes Turkish Water Pollution Control Regulation Turkish Environmental Permit and License Regulation Turkish Regulation on Soil Pollution Control and Point-Source Contaminated Sites	Own resources, external consultants / Main Construction Contractor-IMM Own resources, IM	Prior to construction Within 6 months of lean signing	<ul style="list-style-type: none"> Official correspondence letters with authorities Declaration records Permitting records

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3.2	<ul style="list-style-type: none"> IM to conduct necessary maintenance-repair works on boilers and burners and adjust them properly to ensure all parameters for flue gas emissions are within the threshold as per the regulation IM to install oil-water separators in underground wastewater settlement basins, if possible to ensure oil and grease are collected prior to discharge IM to conduct tri-annual self-test measurement of wastewater. Oil-water separators should be installed to the underground wastewater settlement basins, since the connection to sewer requires such. Actions suggested by the environmental consultant should be undertaken to control pH and TSS in wastewater before it is discharged into the sewer system. Perform wastewater monitoring as required by the authority (tri-annual). For the parameter results above the limits, perform another monitoring and assess the results. If they are also above the limits, take the actions described by the environmental consultant. Preparing a form for daily/weekly inspections of rain and groundwater management and recording the observations and corrective actions should be done. 	Compliance with Turkish legislation	EBRD PR3 Turkish Regulation on Control of Air Pollution Originating from Heating Turkish Water Pollution Control Regulation	Own resources, external consultants / IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Emission measurement reports and other relevant documentation Oil-water separators in place (if installed) Tri-annual wastewater analysis reports
3.3	<ul style="list-style-type: none"> IM to renew the temporary waste storage area at the maintenance workshop in accordance with the technical specifications set by the MoEU and obtain an approval letter from Izmir PDEU for the temporary waste storage area IM to dispose wooden crossties as hazardous waste IM to obtain hazardous material/waste compulsory liability insurance in accordance with legislation IMM to perform audit/controls to the waste storage areas periodically and ensure that the storage areas are in line with the criteria defined in the management plan. The Contractor should ensure that hazardous waste storage areas are provided with proper secondary containment. Ensure all types of wastes from the main contractor and subcontractors should be reported. 	Compliance with Turkish regulations	EBRD PR 3 Waste Management Regulation	Own resources, external consultants / IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Photographs of the improved waste storage area and/or new waste storage area Obtained approval letter for the temporary waste storage area Waste declaration records Valid hazardous material/waste compulsory liability insurance
3.4	<ul style="list-style-type: none"> Main Construction Contractor to implement Waste Management Plan (to be developed) and to ensure that the wastes are stored at the construction sites in accordance with the regulation, waste records and disposal records are kept. 	Compliance with Turkish regulations	EBRD PR 3 Waste Management Regulation	Own resources, external consultants / Main Construction Contractor	During construction	<ul style="list-style-type: none"> Waste Management Plan Waste disposal records
3.5	<ul style="list-style-type: none"> IM to improve hazardous material management practices at the workshop area and to place secondary containment with sufficient capacity and ensure that the hazardous wastes are separately stored in proper designated areas with appropriate measures (i.e. fire extinguishers, SDS forms). Spill kits shall be placed near storage tanks. The instructions for fuel delivery shall be presented in separate documents and before each transfer, the operator and/or the driver of the fuel truck should read and sign it. IM to place Material Safety Data Sheets (MSDSs) where chemicals are handled and stored. Ensure that all MSDS forms are available in Turkish in accordance with the relevant regulation. 	Compliance with Turkish regulations	EBRD PR 3 Turkish Regulation on Material Safety Data Sheets related to Dangerous substances and preparations	Own resources, external consultants / IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Improved hazardous material storage area Secondary containment with sufficient capacity in place MSDS are in place
3.6	<ul style="list-style-type: none"> Main Construction Contractor to implement Hazardous Material Management Plan (to be developed) and to ensure proper use, storage and handling of diesel fuel and any other hazardous material and keep Material Safety Data Sheets (MSDSs) 	Compliance with Turkish regulations	Turkish Regulation on Safety Data Sheets for Hazardous Substances and Mixtures	Own resources, external consultants / Main Construction Contractor	During construction	<ul style="list-style-type: none"> Hazardous Material Management Plan MSDSs in place
3.7	If there are any oil-based transformers at the facilities which may contain PCBs, IM to perform an inventory of the transformers, undertake representative sampling in the transformers to analyze for PCB content in transformer oils and develop a relevant phase out plan for transformers, if PCB is identified.	Waste oil control Compliance with national regulations	EBRD PR3 Turkish Regulation on the Control of Polychlorinated Biphenyls and Polychlorinated Terphenyls; Turkish Waste Oil Control Regulation	Own resources/ external consultants / IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Inventory of transformers Oil testing records Phase-out planning, if necessary based on testing results
3.8	IM to develop a replacement plan for changing the air conditioning and cooling units that operate with R-22 type refrigerants.	Ozone Depleting Substances (ODS) control Compliance with Turkish regulations	EBRD PR3 Turkish Regulation on the Reduction of Ozone Depleting Substances	Own resources/ IM	Within 6 months of lean signing	<ul style="list-style-type: none"> Replacement plan

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3.9	Obtain information from two petroleum stores near the axis of the metro line expansion regarding the soil and groundwater quality within their operational boundaries. The metro design should take into account potential future leakage which may occur from these stations and implement appropriate mitigation measures if needed.	Soil and groundwater quality control	EBRD PR3 Regulation on Soil Pollution Control and Point-Source Contaminated Sites	Own resources, external consultants / Main Construction Contractor - IMM	Prior to construction	<ul style="list-style-type: none"> Soil and groundwater testing results from petroleum retail sites Design assessment for protection against petroleum spills
4	Health and Safety					
4.1	<ul style="list-style-type: none"> Implement an occupational health and safety (OHS) management system and practices in line with OHSAS 18001 (ISO 45001:2018) to guide all activities during construction. Prepare relevant risk assessment documentation to cover all risks related to construction activities (including but not limited to third-party access to construction sites, vibration, road safety risks associated with truck drivers) Implement mitigation measures based on the risk assessment study Establish a Key Performance Indicator (KPI) system which covers subcontractors as part of the OHS management system Develop a clear and comprehensive procedure on subcontractor management Record all tool box talks on daily basis and share it with Contractor teams 	Increased health and safety performance in the workplace	EBRD P4 Occupational Health and Safety Law No. 6331	Own resources, external consultants / Main Construction Contractor	Prior to construction Implementation throughout construction	<ul style="list-style-type: none"> OHS Management System in place Risk assessment documentation in place Training records Work permit procedure Safety awareness programs 'Accident and Near Miss Reporting Procedure' Clear definition of targets and objectives and development of KPIs OHS KPI records and accident investigation leaflets 'Accident and Near Miss Reporting and Investigation Procedure' in place incident/accident notification chain chart Subcontractor Management Procedure in place
4.2	<ul style="list-style-type: none"> IMM to develop an OHS Policy for operation of metros IMM to develop a professional safety site behaviour training program especially for the members of the OHS audit team to be developed. IMM to undertake regular inspections at construction sites IMM to monitor the contractor incidents and review OHS performance on KPIs and statistics on monthly basis 	Increased health and safety performance in the workplace	EBRD PR4 Occupational Health and Safety Law No. 6331	Own resources, IMM with the help of external consultants if needed	Within 3 months after loan signing Regular inspections throughout construction	<ul style="list-style-type: none"> OHS Policy in place Audit Reports Relevant records required from Main Construction Contractor Training records Accident/Near Miss documentation
4.3	<ul style="list-style-type: none"> IM to monitor the contractor incidents and review OHS performance on KPIs and statistics on monthly basis 	Increased health and safety performance in the workplace	EBRD PR4 Occupational Health and Safety Law No. 6331	Own resources, IM	During operation	<ul style="list-style-type: none"> Accident/Near Miss documentation Revised risk assessment
4.4	<p>Main Construction Contractor to take necessary actions for protection of employee health including:</p> <ul style="list-style-type: none"> Develop and implement workplace monitoring programme (noise, vibration, illumination, thermal comfort and air quality) Health examinations reports Evaluate workplace monitoring reports and ensure mitigation measures are implemented on a timely basis. <p>Provide training on working at height to workers (workers can be trained at Izmir Fire and natural disaster training center owned by IMM)</p>	<p>Protection of employee health</p> <p>Increased health and safety performance in the workplace</p>	EBRD PR4 Occupational Health and Safety Law No. 6331	Own resources, external consultants / Main Construction Contractor	During construction Prior to/during construction	<ul style="list-style-type: none"> Health check records including work at height and confined space Health Survey Site Control Training records First aid kits in place at each construction site
4.5	<p>Develop and implement a Lockout/Tagout (LOTO) program and provide technical training to relevant personnel to ensure that dangerous machines are properly shut off and not able to be started up again prior to the completion of maintenance or servicing work. The LOTO program should also cover mechanical and pressurized systems.</p> <p>Proper locks shall be provided for different energy sources and implementation should be in place. Training shall be provided and training records should be maintained.</p>	Increased health and safety performance in the workplace	EBRD PR4	Own resources, external consultants / Main Construction Contractor, IMM to monitor IM	Prior to construction Implementation throughout construction During operation	LOTO program which includes a LOTO safety procedure, plan, and training material

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4.6	<ul style="list-style-type: none"> Ensure that risk assessment study covers risks related to unauthorised third-party access to the construction sites and road safety risks associated with truck drivers. Prevent unauthorized access to site; ensure only registered, trained employees who have work permits and Project ID cards can access to construction site Provide and maintain safety measures such as flag personnel, barriers, road-blocks, fixed cones etc. at construction sites Develop and implement a road safety policy, practices and procedures to include a defensive, anti-rollover and antiskid driving training program for own drivers and concrete mixer supplier drivers. Assess the driving skills of the drivers of the heavy vehicles prior to hiring Monitor and analyze third party accidents and incidents related to construction activities. Review and update risk assessment on regular basis to ensure all risks are identified and addressed including those associated with changes in the process; i.e. purchase of new equipment, change in management process, non-routine work, and in case of accidents etc. 	Protection of community health and safety	EBRD PR4	Own resources, external consultants / Main Construction Contractor	Prior to/during construction	<ul style="list-style-type: none"> Risk assessment report covering third-party and road safety risks. Road safety policy Driver assessment Training records Safety measures in place at the construction sites Public accidents/incidents reports
4.7	<ul style="list-style-type: none"> Prepare an emergency preparedness procedure and plan which includes a worst-case scenario (e.g. serious damage of the construction during an earthquake; one of the critical processes is out of use or interrupted due to landslide; collapse of a construction retaining wall; and groundwater ingress during metro line extension project). Notification chain between IMM and Main Construction Contractor to be included within the Emergency Response Plan. Provide training on how to react in the event of a worst-case scenario Test the worst-case scenario on a regular basis. 	Emergency preparedness and response	EBRD PR4 Occupational Health and Safety Law No. 6331 Regulation on Emergencies at Workplaces;	Own resources, external consultants / Main Construction Contractor - IMM	Prior to construction	<ul style="list-style-type: none"> Emergency Response Procedure and Plan Training records Records of worst-case scenario simulation
4.8	Road signs to be clearly placed where rerouting will be made for better traffic flow	Community health and safety	EBRD PR4	Own resources, external consultants / IMM	Prior to/during construction	<ul style="list-style-type: none"> Road signs in place
4.9	IMM to take necessary preventive measures to ensure that the design of the metro tunnel is adequate and reduce the possibility of groundwater ingress into underground structures and facilities.	Infrastructure, Building Design and Safety	EBRD PR4	Own resources, external consultants / IMM	Prior to construction	<ul style="list-style-type: none"> Third party report reviewing the metro tunnel design
4.10	Conduct a complete life and fire safety review of the Project components (metro line, tunnels, stations) by competent fire experts. Specific requirements for new buildings include assessment of the building in terms of fire prevention, means of egress, detection and alarm systems, compartmentation, fire suppression and control, emergency response plan and operation and maintenance.	Operational safety	EBRD PR4	Own resources, external consultants / Main Construction Contractor - IMM - IM	TBD by EBRD	<ul style="list-style-type: none"> Fire safety review reports
5	Land Acquisition and Economic Displacement					
5.1	<ul style="list-style-type: none"> Monitor the potential impacts on local businesses/shops close to construction sites, including among others, <ul style="list-style-type: none"> (i) Close monitoring and consultation with the 24 people and 1 tradesman temporarily relocated Inform the local businesses and nearby communities that may be affected of Project impacts and any design changes and impacts prior to and during construction through leaflets, posters and face to face meetings Ensure that access to the shops/local businesses are not interrupted due to construction activities. Income losses to be compensated in case of damages. 	Management of livelihood impacts	EBRD PR 5	IMM public relations department Main Construction Contractor	Prior to and during construction	<ul style="list-style-type: none"> Information leaflets/posters are prepared and posted to the local businesses Pre-construction meetings are held with the local shop owners
8	Cultural Heritage					
8.1	Develop an Archaeological Chance Finds Procedure to be implemented in the event of an archaeological discovery during construction activities.	Proper management of culture heritage finds	EBRD PR8	Own resources, external consultants / Main Construction Contractor	Prepare prior to construction Implement throughout the construction	<ul style="list-style-type: none"> Chance Finds Procedure
10	Information Disclosure and Stakeholder Engagement					

Ref.	Actions Required	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs/ Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
10.1	<ul style="list-style-type: none"> • IMM to develop and implement the Stakeholder Engagement Plan (SEP) specific to the Project in order to ensure effective communication of the investment plans, potential impacts and mitigation measures for construction and operation to communities through public meetings (if needed), publications and corporate websites and other appropriate engagement methods. • IMM to undertake consultation activities with business owners prior to commence of construction activities and inform them about the grievance mechanism • All stakeholder engagement activities need to be documented in a systematic way. 	<p>Compliance with laws</p> <p>Good international practice; avoiding project delays; respect of rights; social responsibility, improved relations with the community and stakeholders and decreased complaints</p>	EBRD PR 10	IMM resources IMM public relations department External Consultants	SEP preparation prior to construction and implementation through the construction and operation period	<ul style="list-style-type: none"> • Stakeholder engagement plan and Non-Technical summary (NTS) disclosed on the IMM website • Records of consultation meetings • Reporting on stakeholder engagement activities
10.2	<ul style="list-style-type: none"> • Main Construction Contractor to develop and implement a Formal Grievance Mechanism specific to the construction activities. This should include clear means of registering complaints, an action process to resolve them, and recording of complaints and their resolution. The grievance procedure (including contact numbers) shall be included within the SEP that is being prepared for the Project and should be publicized through IMM website. • Main Construction Contractor to provide relevant trainings on grievance mechanism to site managers and security staff at each construction site • IMM/Main Construction Contractor to place Project contact information signs and information stickers including HIM Call Centre (185) at the entrance of the construction sites. IMM to inform directly affected and nearby communities of the grievance mechanism through appropriate methods. • IMM to review regularly the grievances submitted to the Main Construction Contractor in order to ensure that all grievances are resolved. 	<p>Maintain effective relationships with stakeholders</p> <p>Effective management of conflicts</p>	EBRD PR10	Own resources, external consultants / Main Construction Contractor / IMM	SEP preparation prior to construction and implementation through the construction period	<ul style="list-style-type: none"> • Records of grievances (including all formal and informal complaints) and resolutions. • Training on grievance mechanism provided to site managers and security staff • Project contact information signs and information stickers in place at the entrance of construction signs