

Republic of Türkiye
Ministry of Transport and Infrastructure
(MoTI)

through the General Directorate for
Infrastructure Investments (AYGM)

Istanbul North Rail Crossing Project (INRAIL)
P509952

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Negotiated Version
February 12, 2026

1. The Republic of Türkiye (the Borrower) will implement the İstanbul North Rail Crossing (INRAIL) Project (P509952) (the Project) with the involvement of the Ministry of Transport and Infrastructure (MoTI) through its General Directorate for Infrastructure Investments (AYGM) as set out in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in the Agreement.
2. The Borrower, through MoTI, shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower, through MoTI, shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower, through MoTI, agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower's Representative specified in the Agreement or [Director General of Infrastructure Investments of AYGM]. MoTI shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a) Establish and maintain a Project Implementation Unit (PIU) within the General Directorate for Infrastructure Investments (AYGM) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project, including:</p> <ul style="list-style-type: none"> - one full-time Senior environmental specialist and one environmental specialist, - three full-time social development specialists, and - one full-time occupational health and safety (OHS) specialist. <p>b) Establish and maintain a Project specific sub-unit under the PIU of the General Directorate for Infrastructure Investments (DGII, henceforth "AYGM") under MoTI. This sub-unit will be staffed, as a minimum requirement, with the below full-time specialists to be mobilized through a consulting firm contract. The sub-unit shall be supported by a consulting firm (Project Management Consultant-PMC) that will recruit:</p> <ul style="list-style-type: none"> - one Environmental, Social, Occupational Health and Safety (ESHS) leader, - two environmental specialists, - one social specialist, - one legal expert - one valuation expert - two Occupational Health and Safety (OHS) specialists, - one gender specialist, - one social and resettlement specialist, - one livelihood support specialist, - one HR/labour specialist, - two Community Liaison Officers (one male and one female) to support management of ESHS risks and impacts of the Project under the supervision of the PIU. <p>c) Ensure that the Design and Build ("D+B") Contractors and the Construction Supervision Firms recruit their E&S teams fully in line with the contractual requirements. All proposed E&S personnel shall be subject to a qualification review and interview process conducted by the PIU prior to approval. No project activities shall commence until all required E&S staff have been interviewed, technically evaluated, formally recruited and mobilized.</p> <p>d) Ensure that the Project Implementation and Oversight Consultant (PIOC) is engaged and mobilized, incorporating the required E&S staff in line with the requirements of the terms of reference approved by the Bank.</p>	<p>a) Establish the PIU and hire one additional environmental specialist and one OHS specialist within 30 days of effectiveness and thereafter maintain the PIU and these positions throughout Project implementation.</p> <p>b) Establish INRAIL sub-unit and hire the Consultants (PMC and individuals) to fill the specific positions as listed no later than 120 days after the Effective Date of the Project and thereafter maintain the sub-unit with the PMC and individual consultants including all positions as listed throughout Project implementation.</p> <p>c) Interviews, approvals, recruitment, and mobilization of all required E&S personnel of D+B Contractors & Supervision Consultant Firms shall be completed prior to the commencement of any Project works. The positions shall be maintained throughout Project implementation.</p> <p>d) No later than 180 days after the Effective Date of the Project or prior to the commencement of project works, whichever comes earlier. The positions shall be maintained throughout Project implementation</p>	<p>a) MoTI through AYGM (MoTI/AYGM)</p> <p>b) MoTI/AYGM</p> <p>c) MoTI/AYGM shall comply, and shall cause D+B Contractors & Construction Supervision Consultant Firms to comply</p> <p>d) MoTI/AYGM shall comply and shall cause PMC to comply.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ol style="list-style-type: none"> Training of PIU staff (including sub-unit under the PIU), and Project Management Consultant (PMC) on E&S assessment and management under the ESF. Training of Supervision Consultants' E&S teams on E&S assessment and management under the ESF. Training of Design and Build (D+B) Contractors' E&S teams on E&S assessment and management under the ESF. Training of PIU staff (including sub-unit (PMC) under the PIU), D+B Contractors' E&S teams, Supervision Consultant Firms' E&S teams and all the Project workers on sexual exploitation or abuse (SEA), or sexual harassment (SH). 	<ol style="list-style-type: none"> Complete first training within three (3) months of the engagement of the PMC. Refreshment training will be conducted annually. Initiate the training no later than 45 days after the Supervision Consultant Firms are recruited and maintain training program throughout the project implementation period. Refreshment training will be conducted annually. Initiate the training no later than 45 days after n the D+B Contractors are recruited, and maintain training program throughout the project implementation period. Refreshment trainings will be conducted annually. Initiate the training no later than 45 days after the D+B Contractors are recruited, and maintain training program throughout the project implementation period. Refreshment trainings will be conducted on a bi-annual basis. 	<ol style="list-style-type: none"> MoTI/ AYGM MoTI/AYGM MoTI/AYGM MoTI/ AYGM
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> Status of preparation and implementation of E&S documents required under the ESCP. Status of implementation of the mitigation measures and monitoring actions. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. 	<ol style="list-style-type: none"> Submit bi-annual regular monitoring reports to the Bank throughout Project implementation, commencing six (6) months after the Effective Date of the Agreement. 	<ol style="list-style-type: none"> MoTI/ AYGM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> E&S performance of D+B Contractors and subcontractors as reported through (monthly) D+B Contractors' and Supervision Consultant Firms' reports. Number and status of resolution of incidents and accidents reported under action E below. Plan of activities for the next reporting period 	b) Submit each regular monitoring report to the Bank no later than thirty (30) days after the end of each reporting period.	
D	<p>D+B CONTRACTORS' AND SUPERVISION CONSULTANT FIRMS' MONTHLY E&S MONITORING REPORTS</p> <p>Require D+B Contractors and Supervision Consultant Firms to provide monthly monitoring reports on E&S performance in accordance with the ESF and the metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank.</p>	Require contractors and firms to provide monthly monitoring reports to MoTI within fifteen (15) days of the end of reporting period. Submit the reports to the Bank as annexes to the reports to be submitted under action C above. Provide specific monthly monitoring reports to the Bank at other timeframe intervals if requested.	MoTI/AYGM
E	<p>INCIDENTS AND ACCIDENTS</p> <p>a) Notify the Bank of any incident or accident relating to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>b) Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>a) Notify the Bank immediately, and no later than twenty-four (24) hours after learning of the incident or accident. Provide additional information upon request.</p> <p>b) Provide a review report and Corrective Action Plan to the Bank no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	<p>a) MoTI/AYGM</p> <p>b) MoTI/AYGM</p>
F	<p>THIRD PARTY VERIFICATION REPORTING</p> <p>a) Include in TORs, require, and cause PIOC to produce independent audit reports highlighting compliance levels, gaps, and proposed corrective actions and submit them to AYGM/MoTI</p> <p>b) Require the PIOC to produce and provide Comprehensive Oversight Reports for MoTI/AYGM and the Bank and Co-Financiers and ensure that these are submitted to the Bank and Co-Financiers.</p>	<p>a) Quarterly and Biannually as required in the terms of Reference approved by the Bank.</p> <p>b) Provide quarterly and bi-annual reports to the Bank as required in the terms of reference approved by the Bank.</p>	<p>a) MoTI/AYGM</p> <p>b) MoTI/AYGM</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>a) Update the Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) (disclosed November 13, 2025) for the Project based on final design of the Project under the D+B contracting modality. Updated ESIA and ESMP shall be submitted to the Bank for review and clearance before commencement of civil works. Thereafter implement the updated ESIA and ESMP for the Project, all in a manner consistent with the relevant ESSs.</p> <p>b) Prepare supplemental E&S assessments and plans consistent with the relevant ESSs for Project activities and the Associated Facilities, as needed, including but not limited to: construction camp locations and worker accommodation areas, spoil disposal sites and material storage areas, concrete batching plants, temporary and permanent access roads, quarries and borrow pits, utilities relocation works, etc. Such supplemental assessments shall include site-specific risks, required mitigation measures, monitoring requirements, permitting needs, and relevant management plans, all in accordance with the relevant ESSs. These assessments and corresponding plans shall be submitted to the Bank for review and clearance before commencement of any associated works, and thereafter implement the actions identified therein.</p>	<p>a) Upon selection of the D+B Contractors, update and publicly disclose the ESIA and ESMP based on final design of the Project; finalize prior to the commencement of any civil work on site. Implement the ESIA and ESMP consistently throughout Project implementation.</p> <p>b) Upon selection of the D+B Contractors, and once the final design of the Project as well as all project facilities and associated facilities have been confirmed, prior to the commencement of any related site works.</p>	<p>a) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p> <p>b) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p>
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>a) Incorporate the relevant aspects of the ESCP, including, inter alia, requirement to comply with the Project's ESIA, RF, RP, LMP, SEP, ESMP and other sub-management plans into the E&S specifications of the procurement documents and contracts with D+B Contractors and Supervision Consultant Firms. Thereafter ensure that the D+B Contractors and Supervision Consultant Firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with D+B Contractors/subcontractors and Supervision Consultant Firms to the Bank.</p> <p>b) Require the D+B Contractors to prepare and implement the C-ESMP as set out in the updated Project's ESIA, ESMP and sub-management plans as per the final design, to provide site-specific details for the implementation of mitigation measures and in a manner satisfactory to the Bank.</p>	<p>a) Relevant E&S provisions are incorporated into the procurement documents and contracts prior to the finalization of procurement packages; supervise D+B Contractors throughout Project implementation.</p> <p>b) C-ESMP prepared, submitted, and approved by the Bank prior to the start of civil works.</p>	<p>a) MoTI/AYGM</p> <p>b) MoTI /AYGM shall comply and shall cause D+B Contractors to comply</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities including reporting in compliance with the terms of reference and in manner satisfactory to the Bank.</p>	Throughout Project implementation.	MoTI/AYGM
1.4	<p>ASSOCIATED FACILITIES</p> <p>a) Ensure that the identified and potential Associated Facilities according to the ESIA, including but not limited to borrow areas for sand and gravel, stone quarries, concrete batch plants, asphalt bases and soil disposal areas resulting from tunneling activities in areas close to the Project implementation, are implemented in accordance with the applicable requirements of this ESCP and ESSs.</p> <p>b) Identify any Associated Facilities that are not covered in the updated ESIA and ESMP, promptly notify the Bank, and prepare supplemental E&S assessments and plans under Action 1.1(b) above to assess and manage them consistent with the ESSs and this ESCP.</p>	<p>a) Prior to carrying out any works related to the specific identified Associated Facility and throughout Project implementation.</p> <p>b) Promptly notify the Bank and prepare supplemental E&S assessments and plans under same timeframe as Action 1.1(b) above.</p>	<p>a) MoTI/AYGM</p> <p>b) MoTI/AYGM</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>a) Establish the Labor Management Procedures (LMP) for the Project, consistent with ESS2.</p> <p>b) Update and implement the LMP, consistent with ESS2, ensuring fair, safe, and non-discriminatory working conditions and culturally appropriate, accessible, and confidential communication and grievance processes for all workers.</p> <p>c) Require the D+B Contractors to implement the Contractor's LMP, as set out in the Project's ESMP. The D+B Contractors are required to prepare their own LMP and this document shall include a Code of Conduct (CoC) which has provisions on Sexual Exploitation, Abuse, and Harassment (SEA/SH) incidents.</p> <p>d) To eliminate the risks that may arise from interaction between project workers and local communities, a Labor Influx Management Plan and a Workers' Camp Management Plan based on the Good International Industry Practice and the Project's ESIA shall be prepared and implemented. These plans shall involve sensitization and awareness campaigns among the project workers and the local community, including but not limited to CoC and grievance mechanism.</p>	<p>a) Establish the LMP prepared for the Project and disclosed on November 12, 2025, as updated throughout Project implementation.</p> <p>b) Upon selection of the D+B Contractors, update and publicly disclose the LMP prior to the commencement of any site works. Implement the LMP consistently throughout Project implementation.</p> <p>c) Incorporate the Contractor's LMP as part of the respective bidding documents for the respective D+B Contractors prior to the carrying out of the Project.</p>	<p>a) MoTI/AYGM</p> <p>b) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p> <p>c) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p> <p>d) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		d) Upon selection of the D+B Contractors, prior to commencement of any site works; implement thereafter throughout Project implementation.	
2.2	OCCUPATIONAL HEALTH AND SAFETY (OHS) MANAGEMENT PLAN Require and cause D+B Contractors and subcontractors to prepare, adopt and implement Site Specific OHS Management Plan in accordance with the Project's ESIA/ESMP.	Prepare and adopt prior to commencement of civil works and thereafter implement the plan throughout Project implementation.	MoTI/AYGM shall comply and shall cause D+B Contractors to comply
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoTI/AYGM
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY, AND POLLUTION PREVENTION AND WASTE MANAGEMENT a) Establish, adopt, disclose, update, and implement a stand-alone Pollution Prevention and Control Plan and a Waste Management Plan in accordance with ESS3 and the Project's ESIA and ESMP. b) Include the Pollution Prevention and Control Plan and the Waste Management Plan into all civil works contracts and made contractors and subcontractors obliged to adhere and implement. c) Ensure that the detailed design of the Project including all engineering structures, bridges, viaducts, drainage systems, culverts, watercourse crossings, and other civil works is updated and finalized in a manner that prevents any adverse impacts on the Ömerli Reservoir Catchment Area. As part of this process, conduct formal consultations and coordination with the authorized institutions responsible for watershed protection and water resources management, and incorporate their technical requirements and feedback into the final design. The finalized design shall reflect all measures necessary to avoid contamination risks, erosion and sedimentation, hydrological disruption, and any other potential impacts on the reservoir catchment area.	a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the Pollution Prevention and Control Plan and the Waste Management Plan prior to the commencement of any site works. Implement these plans consistently throughout Project implementation. b) Same timeframe as for the procurement packages and timeframe under action 1.1 above. c) Before commencing any construction activities within the Ömerli Reservoir Catchment Area	a) MoTI/AYGM shall comply and cause D+B Contractors to comply b) MoTI/AYGM c) MoTI/AYGM
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY a) Establish, adopt, update, as needed, and implement a stand-alone Traffic/Transportation Management Plan (TTMP) incorporating measures to manage traffic and road safety risks covering interface with settlements, airport access, highway crossings, and heavy haulage logistics.	a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the TTMP prior to the commencement of any site works. Implement the TTMP consistently throughout Project implementation.	a) MoTI/AYGM shall comply and cause D+B Contractors to comply b) MoTI/AYGM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> b) TTMP shall be included into all civil works contracts and contractors and subcontractors shall be obliged to adhere. 	<ul style="list-style-type: none"> b) Include requirement to develop TTMP in civil works contracts and subcontracts and implement throughout Project implementation. 	
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <ul style="list-style-type: none"> a) Establish, adopt, disclose, and subsequently update and implement a stand-alone Community Health and Safety Management Plan (CHSMP). b) CHSMP shall be included into all civil works contracts and contractors and subcontractors shall be obliged to adhere. 	<ul style="list-style-type: none"> a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the CHSMP prior to the commencement of any site works. Implement the CHSMP consistently throughout Project implementation. b) Include requirement to develop CHSMP in civil works contracts and subcontracts and implement throughout Project implementation. 	<ul style="list-style-type: none"> a) MoTI/AYGM shall comply and shall cause D+B Contractors to comply b) MoTI/AYGM
4.3	<p>SEA AND SH RISKS</p> <p>Prepare a SEA/SH Action Plan along with Accountability and Response Framework and manage SEA/SH risks and impacts through preparation and implementation of the SEA/SH Action Plan and the provisions in the LMP.</p>	<p>Prepare the SEA/SH Action Plan and Accountability and Response Framework no later than thirty (30) days after the Effective Date, and thereafter implement it throughout Project implementation.</p>	MoTI/AYGM
4.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE PLAN</p> <ul style="list-style-type: none"> a) Establish, adopt and implement a stand-alone Emergency Preparedness and Response Plan (EPRP) covering the risks on local communities and the cooperation with related authorities, tunneling safety, rescue, ventilation failures, evacuation protocols. b) EPRP shall be included into all civil works contracts and D+B Contractors and subcontractors are obliged to adhere. 	<ul style="list-style-type: none"> a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the EPRD prior to the commencement of any site works. Implement the EPRD consistently throughout Project implementation. b) Include EPRP in all bidding documents and civil works contracts and subcontracts and implement throughout Project implementation. 	<ul style="list-style-type: none"> a) MoTI/AYGM shall comply and shall cause D+B Contractors to comply b) MoTI/ATGM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.5	<p>SECURITY MANAGEMENT</p> <p>a) Establish, adopt and implement a stand-alone Security Management Plan (SMP) to assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities.</p> <p>b) SMP shall be included into all civil works contracts and D+B Contractors and subcontractors are obliged to adhere.</p>	<p>a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the SMP prior to the commencement of any site works. Implement the SMP consistently throughout Project implementation.</p> <p>b) Same timeframe as for the procurement packages and timeframe under action 1.1 above.</p>	<p>a) MoTI/AYGM shall comply and shall cause & D+B Contractors to comply</p> <p>b) MoTI/ AYGM</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>Establish and implement a stand-alone Resettlement Framework (RF) for the Project, consistent with ESS5.</p>	Implement the RF prepared for the Project throughout Project implementation.	MoTI /AYGM
5.2	Prepare and implement a Resettlement Action Plan (RP) with a Livelihood Restoration Plan (LRP) for each activity under the Project for which such RP and/or LRP is required, as set out in the RF and consistent with the RF.	Prepare and implement the respective RP and/or LRP prior to carrying out the relevant works, ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable, displaced people have been resettled and moving allowances have been provided.	MoTI/AYGM
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>a) Establish, adopt, disclose, subsequently update and implement a Biodiversity Management Plan (BMP), in accordance with the guidelines of the ESMP prepared for the Project, and consistent with ESS6.</p> <p>b) Undertake additional biodiversity field studies covering flora, fauna, habitats, and ecosystem features during appropriate ecological seasons, to identify, assess, and demarcate any potential natural or critical habitats in the Project area in line with Project specific ESIA and ESMP. The findings, together with corresponding avoidance, minimization, restoration, and offset/compensation measures, shall be incorporated into the updated ESIA and ESMP. All resulting mitigation measures shall be implemented accordingly.</p>	<p>a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the BMP prior to the commencement of any site works. Implement the BMP consistently throughout Project implementation.</p>	<p>a) MoTI/ AYGM shall comply and shall cause D+B Contractors to comply</p> <p>b) MoTI/ AYGM shall comply and shall cause D+B Contractors to comply</p> <p>c) MoTI/AYGM</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	c) Updated BMP shall be included into all civil works contracts and D+B Contractors and subcontractors are obliged to adhere.	b) Upon selection of each D+B Contractor, prior to the finalization of BMP, and prior to the commencement of any site works, and implementation throughout the duration of each contract and during the overall Project implementation. c) Same timeframe as for the procurement packages and timeframe under action 1.1 above.	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Currently not relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS a) Prepare, adopt, disclose, subsequently update and implement a stand-alone Cultural Heritage Management Plan (CHMP) in accordance with the guidelines of the ESMP prepared for the Project, and consistent with ESS8. b) Updated CHMP shall be included into all civil works contracts and D+B Contractors and subcontractors are obliged to adhere.	a) Upon selection of the D+B Contractors, prepare, adopt and publicly disclose the CHMP prior to the commencement of any site works. Implement the CHMP consistently throughout Project implementation. b) Same timeframe as for the procurement packages and timeframe under action 1.1 above.	a) MoTI/AYGM shall comply and shall cause D+B Contractors to comply b) MoTI/AYGM
8.2	CHANCE FINDS implement the Chance Finds Procedure consistent with ESS8, as part of the ESIA report and ESMP of the Project.	Same timeframe as for the preparation and implementation of the CHMP above.	MoTI/AYGM shall comply and shall cause D+B Contractors to comply
8.3	Chance Finds Procedure shall be included into all civil works contracts, and D+B Contractors and subcontractors shall be obliged to adhere.	Same timeframe as for the procurement packages and timeframe under action 1.1 above.	MoTI/AYGM
ESS 9: FINANCIAL INTERMEDIARIES			
	Currently not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN a) Implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally	a) Implement the SEP prepared for the Project and disclosed on November 12, 2025, as updated throughout Project implementation	a) MoTI/AYGM

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>b) Plan, organize, and complete all stakeholder engagement meetings, consultations, and outreach activities as outlined in the SEP, and conduct all outstanding stakeholder engagement activities identified in the SEP, including, inter alia, consultations with district-level authorities, municipalities, mukhtars, project-affected settlements, airport authorities (IGA, HEAŞ), the State Hydraulic Works Regional Directorate, the Istanbul Water and Sewerage Administration, Organized Industrial Zones such as the Gebze Organized Industrial Zone and the TAYSAD Organized Industrial Zone, industrial and logistics companies operating within the Project’s area of influence, disadvantaged and vulnerable groups, environmental protection institutions such as the Nature Conservation and National Parks Regional Directorate and the Regional Directorate of Forestry, environmental non-governmental organizations, public service institutions including schools and health centers, infrastructure and utility service providers such as the national electricity distribution company, natural gas distribution companies, and telecommunications operators, civil society organizations, representatives of local and regional media, and any other relevant stakeholders.</p> <p>c) Update and implement a SEP for the Project, consistent with ESS10, ensuring the provision of timely, relevant, understandable and accessible information, and culturally appropriate, inclusive consultations free of manipulation, interference, coercion, discrimination and intimidation.</p>	<p>b) Upon selection of the D+B Contractors and confirmation of the final design, prior to the updating and finalization of SEP under action c) below.</p> <p>c) Upon selection of the D+B Contractors, update and publicly disclose the SEP prior to the commencement of any site works. Implement the SEP, including all engagement and grievance processes, consistently throughout Project implementation.</p>	<p>b) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p> <p>c) MoTI/AYGM shall comply and shall cause D+B Contractors to comply</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Publicize, maintain, and operate in an accessible manner the already established project grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Publicize, maintain and operate the established mechanism throughout Project implementation.	MoTI/AYGM
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <ol style="list-style-type: none"> 1. Establishment of the INRAIL PIU and sub-unit under the PIU (A above) 2. E&S assessments and plans to be updated by the Borrower and D+B Contractors prior to the commencement of any site works 			