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MINISTRY OF TRANSPORT
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Altyapı Yatırımları Genel Müdürlüğü



ISTANBUL NORTH RAIL CROSSING PROJECT (INRAIL)

Labor Management Procedures

CNR-AYGM-INRAIL-LMP

Final

August 2026

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ABBREVIATIONS & DEFINITIONS

ATP	Automatic Train Protection
AYGM	Directorate General of Infrastructure Investments
CAP	Corrective Action Plan
C-ESMP	Contractor's Environmental and Social Management Plan
CoC	Code of Conduct
CSC	Construction Supervision Consultant
D+B	Design and Build
EBRD	European Bank for Reconstruction and Development
EHS	Environmental Health and Safety Guidelines
ERTMS	European Rail Traffic Management System
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESIRT	Environment and Social Incident Response Toolkit
ESMR	Environmental and Social Monitoring Report
ESS	Environmental and Social Standard
ETCS	European Train Control System
GBV	Gender-Based Violence
GIIP	Good International Industry Practices
GM	Grievance Mechanism
HSE	Health, Safety and Environment
IFC	International Finance Corporation
ILO	International Labor Organization
INRAIL	Istanbul North Rail Crossing Project
LM Plan	Labor Management Plan
LMP	Labor Management Procedures
LOTO	Lock Out / Tag Out
MoLSS	Ministry of Labor and Social Security
MoTI	Ministry of Transport and Infrastructure
NATM	New Austrian Tunneling Method
No.	Numbered
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SGK	Social Security Institution
SH	Sexual Harassment
SPD	Standard Procurement Document
TBM	Tunnel Boring Machine
UN	United Nations
WB	World Bank
WBG	World Bank Group
WCMP	Worker's Camp Management Plan
WGM	Workers' Grievance Mechanism
YSS	Yavuz Sultan Selim

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1 OVERVIEW OF LABOR USE ON THE PROJECT

The Istanbul North Rail Crossing Project (INRAIL) will involve a significant number of project workers during its construction and operation phases. This section describes the number of Project workers, characteristics of Project workers and timing of labor requirements based on the available information.

1.1 Number of Project Workers

The category of Project workers in accordance with the World Bank Environmental and Social Standard (ESS) 2 on Labor and Working Conditions, and their estimated numbers are presented as below. Workers' type of employment contract—full-time, part-time, temporary, or seasonal—will not affect their worker category.

- **Direct workers** are defined as those who are directly employed or engaged to work under the Project Implementation Unit (PIU) of Directorate-General of Infrastructure Investments (AYGM). Approximately 20-30 workers will work in the PIU in the construction phase, and 15-20 in the operation phase.

Some of these workers will be AYGM's own personnel who are civil servants. Civil servants assigned to work on Project related activities, regardless of whether they work full time or part time, will continue to work under the terms and conditions of their existing contracts or appointments in the public sector, unless there has been a legal transfer of their employment or engagement under the project. ESS2 provisions on occupational health and safety, and prohibition of child and forced labor will be applied to civil servants engaged in the project.

AYGM will also hire individual experts to support the functions of PIU such as supervision, monitoring, evaluation, stakeholder engagement, community relations, environmental and social management, and other Project-related activities.. They will receive direct payment from AYGM and will be subject to day-to-day instructions and control. Sections 2 to 8 of this Labor Management Procedures (LMP) set out the requirements for these individual experts.

Contracted workers will be the ones those employed or engaged by the Design and Build (D+B) Contractor(s), subcontractors at all tiers, the Construction Supervision Consultant (CSC), Project Management Consultant (PMC), Project Implementation and Oversight Consultant (PIOC), and any other organisations engaged to perform work directly related to the Project. The total number of contracted workers during the construction phase is estimated at approximately 1,500–2,000 workers, of which CSC personnel are estimated at around 25-40 workers. The final workforce numbers will depend on the construction methodology, sequencing of works, and subcontracting arrangements adopted by the D+B Contractors.

During the operation phase, the number of contracted workers will be approximately 50-75 and they will mainly handle rail operations, maintenance, signaling, and cleaning through third-party firms.

For the purpose of this LMP, all contracted workers, including contractor, subcontractor, CSC, PMC and PIOC personnel, will be subject to the labor management requirements contained herein, including worker grievance mechanisms, labor monitoring and reporting requirements, occupational health and safety requirements, worker welfare provisions, and applicable labor audits. Where worker accommodation facilities are provided, all contractors and subcontractors will comply with the worker accommodation requirements established in this LMP and the applicable EBRD/IFC worker accommodation standards. Compliance with these requirements will form part of contractual obligations applicable to both contractors and subcontractors.

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Sections 2 to 8 of this LMP set out the requirements for the contracted workers.

- **Primary supply workers** will be the employees of firms supplying goods and materials critical to the project (e.g., concrete, stone, gravel, steel, ballast, rail components, electrical cables, and signaling systems). Estimated number of primary supply workers during construction phase is 250-300 and during operation phase is 25-50 (for replacement parts and technical servicing).

Section 9 of this LMP sets out the requirements for primary supply workers.

No **community workers** will be involved in the Project activities.

1.2 Characteristics of Project Workers

Direct workers, mostly AYGM staff, are civil servants per national legislation. Both the civil servants and the experts to be hired are expected to be Turkish nationals with backgrounds in engineering, project management, monitoring, and administrative support. Direct workers will likely include both male and female professionals. No workers under the age of 18 will be employed in this category.

Contracted workers will perform the bulk of the construction activities and will be hired by the D+B contractor(s), and their subcontractors. The majority of the workforce will include skilled / semi-skilled and unskilled laborers, construction workers, equipment operators, electricians, welders, safety supervisors, and engineers. A portion of these workers, particularly in specialized roles, may be female. The supervision consultant's staff, including environmental, social, health and safety specialists, and monitoring engineers, will also fall under this category. Contractors may also engage workers through intermediaries or brokers, which necessitates strict monitoring and control procedures. Since the construction activities fall under hazardous activities no workers under the age of 18 shall be employed.

Primary supply workers are expected to be full-time employees of the suppliers. They are likely to be based in industrial zones within Türkiye, although international suppliers may also be involved. Supplier staff will generally be male workers, although female workers may be employed in administrative or technical quality control roles. The majority are expected to be Turkish nationals, though migrant labor presence cannot be excluded entirely depending on the supplier's practices. Since these kinds of activities also fall under hazardous activities, no workers under the age of 18 shall be employed.

Migrant Workers: Contracted workers may include workers residing in İstanbul, domestic migrants from other parts of Türkiye, and foreign migrant workers, including Syrians under temporary protection and nationals from countries such as Afghanistan, Iraq, and others. Foreign migrant workers will be employed through contractors or subcontractors under direct employment relationships. The engagement of foreign workers through third-party employment agencies is not anticipated; however, if such agencies are used, they will be subject to due diligence to ensure compliance with national labor and migration legislation and to prevent exploitative recruitment practices, including the charging of recruitment fees. Special consideration will be given to migrant workers, who may be more vulnerable to exploitation, language barriers, and restricted access to grievance mechanisms. Targeted measures will be implemented to ensure their access to information, grievance channels, and equal working conditions.

1.3 Timing of Labor Requirements

The engagement of direct workers will begin during the pre-construction phase and intensify during construction phase. Most direct workers will be based in AYGM in Ankara with field visits to the construction site as needed. Core staff, such as engineers and environmental/social experts, will remain active throughout the project lifecycle.

Most contracted workers will be mobilized during the construction phase, anticipated to span approximately 6 to 7 years. Workforce numbers will increase significantly during peak

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construction periods, particularly during civil works such as tunnel excavation, bridge erection, and track installation. Workers will be deployed across multiple locations along the railway alignment. Skilled labor (e.g., welders, electricians, machinery operators) will be recruited as per construction sequencing, while unskilled workers (e.g., helpers, loaders) will be required throughout the duration of site works. During operation, a smaller number of contracted staff may be retained for periodic maintenance, inspections, and specialized repairs. Contractors will be required to submit peak headcount estimates by section and subcontractor tier on a quarterly basis to enable proper planning and sizing of worker accommodation, medical facilities, and transportation arrangements.

Primary supply workers will be engaged in line with procurement schedules for major construction inputs. Timing will vary based on delivery timelines, but their work is likely to precede on-site installation activities. In the operational phase, supply workers may be re-engaged intermittently for specialized parts or system replacements. The scaling up and down of the workforce over the project lifecycle will be closely monitored to ensure that labor management systems, including accommodation, worker welfare, and grievance mechanisms, are proportionally adapted to workforce size and composition.

Contractors will provide quarterly labor reports to the CSC and the PIU, covering workforce composition, gender distribution, subcontractor workforce statistics, worker accommodation occupancy, accommodation inspection results, worker grievances, labor and working conditions incidents, training activities, and corrective actions. Labor reporting requirements will be aligned with the applicable WB ESS2 labor monitoring and reporting requirements.

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2 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

2.1 Project Activities

The Istanbul North Rail Crossing Project (INRAIL or the Project) aims to complete the missing high-capacity and heavy-duty overland railway link between the European and Asian sides of Istanbul and is therefore expected to significantly improve the connectivity and logistics efficiency of Türkiye's national railway network.

The Project will be implemented by the Directorate-General of Infrastructure Investments (AYGM) of Türkiye's Ministry of Transport and Infrastructure (MoTI) and will be financed by the World Bank.

The railway line, with a total length of 127 kilometers, branches off the Marmaray Line at the Çayırova location, passes by Sabiha Gökçen Airport, turns north after the airport, crosses the Bosphorus via the Yavuz Sultan Selim Bridge, reaches Istanbul Airport, and finally connects to the Halkalı-Kapıkule Line at Çatalca on the European side. The Project components can be summarized as:

- **Structures:**
 - The alignment incorporates 25 tunnels with a total length of 59.2 km, including 5 Tunnel Boring Machine (TBM) tunnels totaling 34.5 km and 20 New Austrian Tunneling Method (NATM) tunnels with a combined length of 24.7 km. In addition, the Project includes 42 viaducts and bridges with a total length of 22.1 km, 15 cut-and-cover tunnels totaling approximately 3 km, 20 underpasses and overpasses (comprising 9 underpasses and 11 overpasses) and 37 culverts along the alignment.
- **Electrification and Signaling:**
 - To feed electrification facilities, 154/25 kV transformer centers (3 units) will be built.
 - For signaling, European Rail Traffic Management System (ERTMS) / European Train Control System (ETCS) / Automatic Train Protection (ATP) /Level 1-2 automatic train protection and control systems will be installed.

The location of the Project is given in Annex-1.

2.2 Key Labor Risks

The Project is expected to involve large-scale civil works including tunneling, elevated viaducts, station, bridge construction, and rail infrastructure deployment across both densely urbanized and semi-rural zones of Istanbul. These activities, along with the scale and complexity of the Project, bring several key labor-related risks, including those related to worker accommodation, labor monitoring systems, grievance management, and contractor and subcontractor management.

The mitigation measures for the following labor risks are addressed in Section 6. If other labor risks arise during the project implementation, AYGM will develop procedures to prevent further impacts. The contracts with third parties (e.g. D+B contractors, CSC and sub-contractors) will include requirements for management of labor risks.

Occupational Health and Safety (OHS)

One of the most significant key potential labor risks of the Project are the OHS risks due to the nature of rail infrastructure works. Workers may face hazards such as working at heights, in confined areas and underground tunnels, and around heavy machinery or energized electrical systems. There is also exposure to construction airborne agents such as concrete dust and silica, as well as hazardous materials like solvents, fuel, and welding fumes. The risk of physical injuries and illnesses from moving equipment, vibration, noise, localized landslides,

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site traffic, welding, ergonomic factors, illumination, fire, explosions, and exposure to corrosive, oxidizing, and reactive chemicals is also high.

The project route passes through forested areas or open fields, which may expose workers to insect bites or heat stress. Seasonal conditions may further exacerbate these risks.

Furthermore, the urban setting increases exposure to traffic-related accidents, especially during transport of materials and access to active construction zones. The limited right-of-way in these areas may also exacerbate OHS risks due to constrained work zones.

Finally, flooding during tunneling, gas leaks in confined areas, and interactions with Istanbul's dense utility networks (water, electricity, gas) pose elevated risks during the construction stage. Earthquakes and ground stability must also be factored in, especially during underground works.

Inadequate awareness or enforcement of personal protective equipment (PPE) use and safety procedures, i.e., unsafe handling of tools, welding practices and improper conduct around electrical or mechanical systems—especially among low-skilled, first-time or migrant construction workers—presents another major challenge.

Potential OHS risks during the operational phase are associated with track inspection, signaling system maintenance, and electrical and mechanical system servicing. Workers tasked with maintaining catenary systems, switches, and track structures may face hazards such as electrocution, slips and falls, ergonomic stress injuries, and exposure to inclement weather conditions during outdoor maintenance work. The presence of moving trains during inspection or repair activities introduces serious safety and timing risks, requiring well-coordinated communication and enforcement of safety protocols.

Working Hours

Due to the complexity of the construction activities, urban constraints along the alignment, and the need to minimize disruption to traffic and local communities, night shifts or extended work hours may become necessary during critical phases of construction. Inadequate monitoring of work hours and rest days—especially among subcontractors—could lead to non-compliance with Turkish labor laws—which stipulate a maximum of 45 working hours per week—and commitment to international labor conventions. If not properly managed, this may result in labor rights violations, reduced productivity, and safety incidents due to worker exhaustion. Weak monitoring and reporting systems, particularly across subcontractors, may further increase the risk of non-compliance with working hours requirements.

Child Labor

While the risk of child labor is low due to the nature of the railway construction sector and strict Turkish labor laws, instances of child labor could occur in low-skilled support services provided by subcontractors or primary suppliers.

Forced Labor

The overall risk of forced labor in Türkiye is considered low due to national legislation and institutional mechanisms. However, considering that the Project will be implemented nearby Istanbul—which is a large urban center with a presence of migrant workers, some of whom may be undocumented—there is a residual risk of coercive recruitment practices, withholding of wages, restriction of movement, or threats of deportation. These risks may be more pronounced in multi-tier subcontracting arrangements, particularly where oversight and monitoring mechanisms are not consistently applied. The Project will prohibit the retention of workers' identity documents, charging of recruitment fees, debt bondage, human trafficking, and any other practices that may constitute forced labor under national legislation or international good practice requirements.

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Migrant Workers

Based on current labor market dynamics in Istanbul and the expected scale of civil works, the workforce may include domestic and international migrants, including registered Syrians under temporary protection, Afghans and any other migrants from other countries who has work permit. This will introduce risks related to language barriers, cultural integration, and potential vulnerability to poor working conditions or discrimination. Language barriers in particular may increase OHS risks, where workers may not fully understand site rules, safety procedures, training content, or emergency instructions, potentially posing risks both to themselves and to other workers on site. Migrant workers may face increased vulnerability due to factors such as language barriers, limited familiarity with local labor regulations, and potential challenges in accessing employment information and grievance mechanisms. If not adequately monitored, these conditions may create risks related to transparency in employment terms and equal access to worker protection measures.

To mitigate these risks, OHS trainings, toolbox talks, and safety-related materials will be delivered in a manner understandable to migrant workers, including through the use of translated materials, visual aids, and practical demonstrations, as appropriate. Contractors will be required to ensure that migrant workers fully understand OHS requirements and site-specific risks, and that such measures are reflected in the Project's OHS management and supervision arrangements.

Labor Influx

While the project is located within the metropolitan boundaries of Istanbul—a city with substantial labor availability and skilled workforce—parts of the railway alignment pass near or through semi-rural settlements where formal employment opportunities may be limited. This may result in a moderate degree of labor influx to specific construction segments, particularly where local labor cannot meet the demand for skilled or specialized roles. Labor influx to such semi-rural areas could generate pressure on local infrastructure, housing, and public services, and may also increase the risk of social tensions or gender-based violence (GBV) and Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), especially if worker accommodation is not properly managed.

Worker Accommodation

Given the scale of the workforce and potential labor influx to certain sections of the Project, there is a risk that worker accommodation facilities, particularly those provided by contractors and subcontractors, may not meet required international standards.

Potential risks include overcrowding, inadequate sanitation, insufficient access to potable water, poor waste management, lack of privacy, inadequate fire safety measures, and heightened exposure to communicable diseases.

Inadequate accommodation conditions may also increase risks of social tension, Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), reduced worker wellbeing, and non-compliance with ESS2.

This risk is particularly relevant where accommodation is provided by subcontractors or third parties and may not be subject to consistent standards or monitoring without proper controls. All worker accommodation facilities established for the Project will comply with the applicable EBRD/IFC worker accommodation standards and will be regularly inspected using the relevant worker accommodation inspection checklist. Accommodation facilities provided by contractors and subcontractors will be subject to periodic monitoring and reporting requirements.

Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH)

The Project, due to its scale and the nature of civil works, involves a substantial construction workforce, including a high proportion of male workers, both local and non-local. This gender imbalance, coupled with the establishment of temporary worker camps or concentration of

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male workers near semi-rural or residential areas, creates an elevated risk for incidents of SEA/SH, particularly affecting women and vulnerable individuals in host communities and among project workers themselves. Limited access to confidential and effective grievance mechanisms may further increase the risk of underreporting of SEA/SH incidents.

In this context, and to mitigate such risks a Worker's Camp Management Plan will be prepared to ensure the proper management and oversight of worker accommodations, in accordance with ESS2 requirements and related guidance notes with specific attention to minimizing SEA/SH risks in and around worker housing areas. This plan will be prepared by the D+B Contractor(s), reviewed and approved by the AYGM PIU, and subsequently reviewed and approved by the World Bank.

Therefore, the Project is assessed as substantial on SEA/SH risk, mainly due to:

- The size and duration of construction works;
- The likelihood of labor influx into communities near semi-rural project sections;
- The limited local availability of skilled labor in those areas;
- Social and economic vulnerabilities among certain community groups;
- The absence, in some areas, of established institutional mechanisms for addressing SEA/SH.

Further, the construction sector in Türkiye, while governed by strong labor laws, has traditionally been male-dominated, and reported cases of workplace harassment—though likely underreported—indicate the need for proactive prevention and response measures.

Mitigation measures to address SEA/SH risks are included in the section on Policies and Procedures. These measures are aligned with and further detailed under the Project's SEA/SH Action Plan and the Accountability Response Framework, which sets out specific prevention, reporting, and response actions. This LMP includes a generic Code of Conduct (CoC) to be adopted by all contractors in projects supporting major civil works as part of the Project's overall SEA/SH risk management approach.

Labor Monitoring and Reporting

Labor monitoring and reporting systems represent a key labor management risk due to the large workforce, multiple contractors and subcontractors, and geographically dispersed construction sites. Inadequate monitoring may result in delayed identification of labor and working conditions issues, non-compliance with labor requirements, ineffective grievance management, insufficient oversight of worker accommodation, and inconsistent implementation of corrective actions.

The involvement of multiple subcontracting tiers may further increase the risk of incomplete workforce records, underreporting of incidents, and inconsistent labor standards across the Project workforce. Effective labor monitoring and reporting systems are therefore required to ensure compliance with this LMP and applicable lender requirements. This includes periodic reporting on workforce composition, labor grievances, accommodation inspections, labor incidents, corrective actions, and subcontractor performance.

Contractor and Subcontractor Management

Due to the scale of the Project and the anticipated use of multiple contractors and subcontractors, there is a risk that labor management requirements may not be consistently implemented throughout the contracting chain. Potential risks include inconsistent application of labor standards, inadequate supervision of subcontractors, insufficient grievance management, poor accommodation conditions, and gaps in labor monitoring and reporting.

Without effective contractor management systems, labor-related non-compliances may remain unidentified or unresolved. Particular attention will therefore be given to ensuring that labor management requirements are fully communicated, implemented, monitored, and enforced across all tiers of contractors and subcontractors.

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Epidemics and Pandemics

Risks associated with the emergence of new epidemics/pandemics will persist.

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3 LEGAL FRAMEWORK

Türkiye ratified the following ten fundamental conventions of the International Labor Organization (ILO), incorporating them into its national legislation.

- Forced Labor Convention, 1930 (No. 29)
- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Equal Remuneration Convention, 1951 (No. 100)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labor Convention, 1999 (No. 182)
- Occupational Health and Safety (OHS) Convention, 1981 (No. 155)
- Promotional Framework for OHS Convention, 2006 (No. 187)

The Labor Law (No. 4857) serves as the cornerstone in the regulation of worker relations and the safeguarding of the workforce. This comprehensive law encompasses various provisions addressing key aspects such as the principle of equal treatment, employment contracts, their types and termination, wages and payment protocols, penalties for wage reductions, regulations on overwork, work on holidays, holiday pay, annual paid leaves, working hours, compensation work, break periods, regulations on working age, the prohibition of employing children, and provisions for work and breastfeeding leave during maternity. In essence, the Labor Law No. 4857 covers a wide spectrum of crucial elements pertaining to the employment relationship and the well-being of the workforce.

The Occupational Health and Safety Law (No 6331) in Türkiye, enacted in 2012, provides a comprehensive legal framework aimed at ensuring safe and healthy working environments across all sectors, regardless of the number of employees or type of employment. The law introduces a proactive, risk-based approach to occupational health and safety, emphasizing the identification, assessment, and mitigation of workplace hazards before incidents occur. It mandates the establishment of internal OHS management systems, the appointment of safety professionals (including occupational safety specialists, workplace physicians, and other health personnel), and regular risk assessments. Furthermore, the law imposes responsibilities on both employers and employees, fostering a shared commitment to safety. It also strengthens regulatory oversight through inspections and sanctions, while promoting training, consultation, and participation of workers in OHS matters. By aligning with European Union directives and international labor standards, OHS Law represents a significant step toward improving workplace safety culture in Türkiye.

The intent of the **Unions and Collective Bargaining Law (No. 6356)** is to outline the procedures and principles governing the formation, administration, functioning, oversight, and organization of worker and employer unions and confederations. Additionally, the law aims to facilitate the negotiation of collective bargaining agreements between workers and employers, allowing them to mutually determine their economic and social standing, as well as working conditions. The law further seeks to establish mechanisms for the peaceful resolution of disputes and provides provisions for the utilization of strikes and lockouts when necessary.

3.1 Brief Overview of Labor Legislation: Terms and Conditions

Types of Employment Contracts

As per the Turkish Labor Law, the main categories of employment contracts are: definite (fixed term) and indefinite (open-ended), full time and part time contracts, continuous and transitory contracts; seasonal; employment contracts with or without trial periods; provisional employment contracts and team employment contracts. Employment which lasts only up to 30 days is transitory; and employment which requires a longer period is continual. If employment

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is transitory, provisions of the Obligations Act shall apply on certain matters as defined by the Labor Law.

Article 5 of the Labor Law embraces the principle that all employees should be treated equally. Accordingly, employers cannot treat temporary and agency workers or part-time workers differently from the permanent employees unless justifiable grounds exist for the different treatment.

Wages and deductions

Article 32 of the Labor Law defines “wage” in general terms, as the amount of money to be paid in cash by an employer or by a third party to a person in return for work performed by him. Without discrimination, each employee has a right to demand remuneration for the work they conduct.

The minimum wage in Türkiye is determined by the Minimum Wage Determination Commission (Article 39 of the Labor Law). According to Article 4 of the Minimum Wage Regulation (Official Gazette No. 25540, August 1, 2004), the minimum wage is defined as the lowest remuneration payable to workers in return for a normal working day, ensuring that their essential living expenses can be met. Furthermore, Article 102 of the Labor Law explicitly stipulates that employers who pay workers below the legally determined minimum wage are subject to administrative fines. The minimum wage in Türkiye must be determined at least every two years by the Minimum Wage Determination Commission (Article 39 of the Labor Law) ⁽¹⁾ and published in the Official Gazette ⁽²⁾.

Pursuant to Article 34 of Labor Law any worker whose wage is not paid within twenty days as of the date of wage payment, except for a force majeure, may abstain from fulfilling his/her working liability. Even if the non-fulfilment of working liabilities for this reason based on personal decisions of workers gains a collective character numerically, this shall not be considered as a strike. The highest interest rate applied for deposits shall be applied for wages not paid on due date.

The labor contracts of such workers shall not be terminated, new workers shall not be admitted in their places and their works shall not be assigned to other persons for not working due to this reason.

Pursuant to Article 38 of Labor Law, the employer shall not exercise wage deduction penalty for the worker for reasons other than those specified in the collective contract or labor contract.

The deductions to be made from worker's wages as penalties should be immediately informed to the worker along with reasons thereof. Such deductions from worker wages shall not exceed two daily wages in a month or two days' earnings of the worker in wages paid per piece or per the amount of work performed.

Such deductions shall be deposited with the account of the MoLSS within one month as of the deduction for utilization for the training and social services of the workers, in one of the banks established in Türkiye and entitled to accept deposits, to be nominated by the MoLSS. Every employer shall be obliged to keep a separate account of such deductions at the business.

Working hours

According to Article 63 of the Labor Law, the standard working time shall not exceed forty-five hours per week. Unless otherwise agreed, this time is to be distributed equally across the working days of the week. However, with the mutual agreement of the employer and employee, the weekly working hours may be distributed unevenly across the working days, provided that daily working time does not exceed eleven hours. In such cases, the employee’s average

¹ In practice, especially during periods of high inflation, it has been determined annually or even twice a year to preserve workers' purchasing power.
² The most recent minimum wage was published in the Official Gazette No. 32765 on December 27, 2024 (www.resmigazete.gov.tr/eskiler/2024/12/20241227-7.pdf), following the Commission's decision of December 24, 2024.

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weekly working time over a reference period of two months must not exceed the standard weekly working time. This reference (or balancing period) may be extended up to four months by collective labor agreements.

The workers shall be informed of the starting and ending times of daily working periods as well as of break times.

Starting and ending times of the working period may be arranged differently for workers, according to the nature of the work (Article 67).

Periods reckoned as working period

According to the Labor Law, the following periods shall be calculated as part of the daily working period of the workers. The periods spent on the way, in cases where the workers are sent by the employer from their workplace to any other places to work.

c) Free periods of the worker spent at the workplace, being available for working at any moment but waiting for any possible work, without working.

d) Periods spent by the worker for being sent by the employer to another place or being made occupied at the house or office of the employer or any place relating to the employer, without performing his/her main job.

e) The periods specified for breast-feeding female workers.

f) Periods elapsing for collective and regular transport of workers from and to their workplaces which are distant from their settlement area for any kind of work requiring collective transport such as construction, maintenance or repair and modification of railways, roads and bridges (Article 66).

Overtime hours and overtime payment

As per Article 41 of the Labor Law, works which exceed forty-five hours a week are defined as overtime. An employer may request employees to work overtime. The employee's consent shall be required for overtime work. Total overtime work shall not be more than two hundred and seventy hours in a year.

Employees under the age of 18, pregnant women, and breastfeeding mother cannot be required to work overtime.

Weekly rest day and rest breaks

The employees are allowed to take a rest for a minimum of twenty-four hours (weekly rest day) without interruption within a seven-day time period, provided they have worked up to 45 hours on the days preceding the weekly rest day. By law, employers do not have the right to deduct this weekly rest from the employees' salaries. Additionally, Article 68 of the Labor Law states that employees are entitled to a rest break, the duration of which varies depending on the working hours. Each employee is entitled to 15 minutes of break for jobs lasting up to four hours; 30 minutes of break for jobs lasting up to 7.5 hours, and one hour of break for jobs lasting more than 7.5 hours. Arrangements for breaks will be made according to the local traditions and requirements of the work. Employees shall be provided with adequate facilities and reasonable time during work hours for meals and hydration, in line with labor regulations and workplace practices. Such breaks shall be at minimum level and applied uninterruptedly.

However, such periods may be applied intermittently by reaching an agreement, considering the climatic and seasonal conditions and local traditions as well as the nature of the work.

Breaks may be used by workers at the same time or at different times at a workplace.

Breaks shall not be considered as part of working period (Article 68).

Annual Leaves

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The minimum leave period according to the length of service of the employee has been set in the Labor Law as follows;

- 1 to 5 years (included) - 14 working days
- 5 to 15 years - 20 working days
- 15 years (included) or longer - 26 working days

The Law stipulates that paid annual leave may not be less than 20 days for employees over the age of 50. Employees are also provided to the right to take up to 4 days leave without pay, on the condition that the employee provides documentary evidence that s/he is spending his/her annual leave at a place other than where the workplace is located.

Employees engaged in seasonal or other occupations which, owing to their nature, last less than one year are not entitled to paid annual leave.

Paid leaves for civil servants have been defined in the Law (No:657) as; who have served for less than 10 years have 20 days of annual leaves and those who have served for more than 10 years have the right of 30 days annual leave.

Labor disputes

The Labor Law includes provisions that allow workers to resolve disputes in cases where there is a disagreement between the employer and the employee over the essential terms and conditions of a labor agreement or other aspects of work. (Article 20 of Labor Law; Article 91 of Labor Law regulates “the application to the MoLSS for workers’ rights arising from their debt owed.; Article 50-51-52 of Law No. 6356 on Trade Unions and Collective Bargaining Agreements regulates “rights of application to the High Board of Arbitration and Private Arbitrator for workers labor disputes”; Article 3 of Law on Labor Courts numbered 7036 regulates “conciliation procedure”.

The employee who alleges that no reason was given for the termination of his employment contract or who considers that the reasons shown were not valid to justify the termination shall be entitled to lodge an appeal against that termination with the labor court within one month of receiving the notice of termination. If there is an arbitration clause in the collective agreement or if the parties agree, the dispute may also be referred to private arbitration within the same period of time.

The burden of proving that the termination was based on a valid reason shall rest on the employer. However, the burden of proof shall be on the employee if he claims that the termination was based on a reason different from the one presented by the employer.

The court must apply fast-hearing procedures and conclude the case within two months. In the case the decision is appealed, the Court of Cassation must issue its definitive verdict within one month (Article 20).

If the court or the arbitrator concludes that the termination is unjustified because no valid reason has been given or the alleged reason is invalid, the employer must re-engage the employee in work within one month. If, upon the application of the employee, the employer does not re-engage him in work, compensation to be not less than the employee’s four months’ wages and not more than his eight months’ wages shall be paid to him by the employer.

In its verdict ruling the termination invalid, the court shall also designate the amount of compensation to be paid to the employee in case he is not re-engaged in work.

The employee shall be paid up to four months’ total of his wages and other entitlements for the time he is not re-engaged in work until the finalization of the court’s verdict. If advance notice pay or severance pay has already been paid to the reinstated employee, it shall be deducted from the compensation computed in accordance with the above-stated subsections. If term of notice has not been given nor advance notice paid, the wages corresponding to term of notice shall also be paid to the employee not re-engaged in work.

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For re-engagement in work, the employee must make an application to the employer within ten working days of the date on which the finalized court verdict was communicated to him. If the employee does not apply within the said period of time, termination shall be deemed valid, in which case the employer shall be held liable only for the legal consequences of that termination (Article 21).

Termination of an employment contract: Under the Labor Law, employers can terminate contracts in two ways: (i) showing a valid reason (Art. 18-19) or (ii) breaking the contract for a just cause. Employees who have completed 6 months of employment in a workplace that has at least 30 workers, can benefit from certain protections under the Labor Law, protecting the worker from arbitrary termination of his/her contract. For the termination of an employment contract to be valid, a written notice must be given to the employee and legal notice periods must be respected. However, in certain cases, employers can terminate the employment relationship on the basis of a just cause (for reasons of health, for immoral, dishonorable or malicious conduct or other similar behavior, force majeure). In these cases, the employer is not obliged to comply with the legal notice periods and can terminate it immediately (Art. 24-26).

Severance payment

Upon termination of the employment contract, employees are entitled to a severance payment on the condition that the employee has completed at least one year of continuous employment. This payment is calculated by multiplying the number of years of employment with the employee's monthly salary at termination. If the employer terminates the employment contract under just cause based on health reasons or force majeure, the employer must give severance pay to the employee, if applicable. However, if the employer terminates the employment contract under just cause on grounds of immoral and dishonorable acts of the employee, the employer is not liable to pay severance. If the employee terminates the employment contract for just cause, the employer must pay severance in all cases.

However, where the employee terminates the employment contract at will, without the presence of any cause set out under the Labor Law, the employer is not liable to pay severance to the employee.

Freedom of Association

Employees are free to associate in and join trade unions and discrimination based on such membership is prohibited (Article 51 of the Constitution, Articles 3, 17, and 25 of the Unions and Collective Bargaining Law and Article 18 of the Labor Law). Trade unions may be established in 20 sectors predefined by the MoLSS (Article 5, Unions and Collective Bargaining Law).

Collective agreements are governed by the Unions and Collective Bargaining Law, which regulates trade unions' activities, collective bargaining, and industrial action in both the private and public sectors in 20 activity areas (Articles 1 and 4, Unions and Collective Bargaining Law).

Collective agreements at the sectoral level may only regulate matters related to trainings, OHS, social responsibility, and employment policies (Article 33, Unions and Collective Bargaining Law). Collective agreements at company level may be concluded for one or more workplaces and may cover one or more employers (Articles 33 and 34, Unions and Collective Bargaining Law).

In order to be competent to initiate collective bargaining, trade unions must represent at least three percent of the workers engaged in a given branch of activity, more than 50 percent of workers in the workplace, or 40 percent of the workers in the enterprise to be covered by the collective agreement (Article 41, Unions and Collective Bargaining Law). Their competence is ascertained annually by the MoLSS and may be disputed by employers (Article 42, Unions and Collective Bargaining Law).

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Non-discrimination and Equal Opportunities

The Constitution guarantees equality before the law and equal legal protection irrespective of a person's language, race, color, gender, political opinion, philosophical belief, religion, or sect membership (Article 10). Employment related discrimination is a criminal offence (Article 122, Criminal Code). The Law on Human Rights and Equality Institution in Türkiye prohibits discrimination based on gender, ethnicity, nationality, skin color, language, religion, philosophical or political opinion, wealth, birth, marital status, health, disability or age (Article 3).

The Labor Law prohibits both direct and indirect discrimination against jobseekers and employees on grounds of language, race, disability, political opinion, philosophical belief, religion, or any employment relationship (Article 5).

Discrimination based on gender and maternity is prohibited, unless justified under the Article 5 of the Labor Law. The Labor Law forbids termination of employment on grounds of race, color, sex, marital status, family responsibilities, pregnancy, birth, religion, or political opinion (Article 18).

Article 6 of the Law on Human Rights and Equality Institution in Türkiye specifically covers job advertisements, selection criteria, recruitment, and promotions. The law lays down and extends the principle of equal treatment to access to employment, vocational training, promotion, and working conditions, and to access all types and all levels of vocational guidance, vocational retraining, including practical work experience.

Workers who have been discriminated against are entitled to financial compensation amounting to up to their four monthly wages (Article 5, Labor Law).

Sexual Harassment in the workplace

Turkish law prohibits sexual harassment. Provisions of the Constitution, Criminal Code, Law of Obligations, Civil Code, and Labor Law all prohibit harassment.

The Labor Law entitles employees to immediately terminate their employment contracts if they are subject to harassment. Protection from harassment is not limited to sexual harassment but also includes the protection of the employee's dignity and honor, in which case the employee may be entitled to demand immediate termination of the employment relationship. Employees are entitled to severance pay and all other acquired rights when the employment contract is terminated on these grounds (Articles 24 and 25, Labor Law). Furthermore, employers must take the necessary actions to protect employees from both psychological and sexual harassment (Article 417, Law of Obligations).

Collective Dismissal

Labor Law Article 29.- When the employer contemplates collective terminations for reasons of an economic, technological, structural or similar nature necessitated by the requirements of the enterprise, the establishment or activity, he shall provide the union shop-stewards, the relevant regional directorate of labor and the Public Employment Office with written information at least 30 days prior to the intended lay-off. A collective dismissal occurs when,

- a) in establishments employing between 20 and 100 employees, a minimum of 10 employees; and
- b) in establishments employing between 101 and 300 employees, a minimum of 10 percent of employees; and
- c) in establishments employing 301 and more workers, a minimum of 30 employees, are to be terminated in accordance with Article 17 on the same date or at different dates within one month.

Forced Labor and Child Labor

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Labor Law does not cover forced labor issues. However, Article 18 of the Constitution of the Republic of Türkiye, prohibits forced labor: “No one shall be forced to work. Forced labor is prohibited. Work required of an individual while serving a sentence or under detention provided that the form and conditions of such labor are prescribed by law; services required from citizens during a state of emergency; and physical or intellectual work necessitated by the needs of the country as a civic obligation shall not be considered as forced labor.” Prison labor, work during a state of emergency, and work required by the country as a civic obligation do not constitute forced labor.

Article 80 and Article 117 of the Penal Code penalizes human trafficking and violation of the freedom to work and labor, respectively.

Türkiye has ratified the ILO Convention No. 29 on Forced Labor and ILO Convention No. 105 on the Abolition of Forced Labor.

Labor Law sets the minimum age at which a child can be employed as well as the conditions under which children can work (Article 71). The minimum employment age is 15, but in certain cases of vocational training, mild work may be allowed for 14-year-olds.

According to Turkish Labor Law, Article 73, boys under the age of eighteen and women irrespective of their age must not be employed on underground or underwater work like in mines, cable-laying and the construction of sewers and tunnels. While complying with legal restrictions on underground assignments, the Project shall ensure non-discrimination by actively recruiting and placing women in surface works, labs, quality control, E&S, depots, control rooms and administration; and will report quarterly by job family and grade.

Türkiye has ratified the United Nations (UN) Convention on the Rights of the Child, which protects children from economic exploitation and from performing any work that is likely to be hazardous, interfere with their education, or harm their health or physical, mental, spiritual, moral, or social development.

3.2 Brief Overview of Labor Legislation: Occupational Health and Safety

The MoLSS is the main responsible organization in this field, in collaboration with other ministries and stakeholders, and is responsible for developing, implementing and enforcing legislation. The two most relevant units of the MoLSS are the Directorate General of Occupational Safety and Health, and the Department of Guidance and Inspection. The Directorate General develops legislation of occupational safety and health in collaboration with other stakeholders, while Department of Guidance and Inspection perform inspections in terms of compliance with occupational safety and health legislation, and also for labor relations and management issues.

The Occupational Safety and Health Law includes all workplaces and workers, including civil servants, workers at private enterprises and the self-employed workers; regardless of the number of employees or the kind of work. Providing occupational safety and health services is the responsibility of the employer. The employer, in accordance with legal requirements can provide the services by establishing an occupational safety and health unit in the workplace.

The education, training and placement of occupational physicians, occupational safety experts' and other health personnel is conducted under the authority of the MoLSS, whereas the performance of certification exams was delegated to the Measuring, Selection and Placement Centre.

The Occupational Health and Safety Law (OHS Law) (No. 6331; 2012) was published in the Official Gazette in 2012. Before 2012, occupational safety and health issues were regulated in the Labor Law, related regulations and some other general laws. The OHS Law applies to all jobs and workplaces in both the public and private sector, regardless of their field of activities or number of workers, and covers all employees, interns, employers and their representatives.

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The ultimate aim of the OHS Law is to prevent occupational diseases and accidents, and other physical and mental health problems of the workers related to work and the work environment. The OHS Law defines the main stakeholders namely employees, employers and the State, and their duties and responsibilities in working life. The Law also defines the basic terminology related to work life such as workplace, hazard, risk, occupational disease, occupational accident, prevention, safety and health unit, occupational safety and health professionals and their responsibilities. According to the OHS Law, the employer should perform risk assessment and has the responsibility of taking all necessary measures to ensure occupational safety and health. In addition, under national legislation, all employees must be registered with the social security system, which provides mandatory health insurance coverage. Employers are responsible for ensuring workers' registration with the Social Security Institution (SSI), through which workers access public health services. Registered foreign workers, including those under temporary protection, are entitled to access health services in accordance with applicable national regulations.

Article 4 of the Law defines the duties, authority and responsibilities of the employer and workers. As per Article 4, the employer has a duty to ensure the safety and health of workers in every aspect related to work. In this respect the employer shall take the measures necessary for safety and health protection of workers, including provision of necessary organization, designating safety and health staff, informing and training of workers, carrying out risk assessment, implementing measures related to occupational safety and health in accordance with the legislation, etc.

As indicated in Article 6 of the Law, in order to provide OHS services employers shall appoint an occupational safety specialist, workplace doctor, and, in very hazardous workplaces with ten or more employees, additional health personnel from among their staff. If qualified personnel are not available internally, these services may be obtained partially or fully from authorized joint health and safety units or OHS centers, and employers who possess the required qualifications and certification may carry out the services themselves, considering the workplace's hazard class and workforce size. Employers are obligated to provide appointed personnel or contracted institutions with all necessary resources, including tools, equipment, space, and time; ensure cooperation and coordination among OHS service providers; implement legally compliant, written OHS measures; and inform all relevant parties, including outside workers and their employers, of any known or potential risks. In workplaces with a full-time workplace doctor, appointing additional health personnel is not required.

The OHS Law also regulates workers' right to abstain from work in cases of serious or imminent danger. The OHS Law refers to secondary legislation to for a description of further details to ensure an effective implementation of the Law.

Secondary Legislation

A series of secondary legislation have been adopted to explain the details of relevant laws. Other regulations that can be evaluated within the context of the Project are (but not limited to);

- Regulation on the Use of Personal Protective Equipment in Workplaces: The purpose of this regulation is to determine the procedures and principles regarding the features, supply, use and other matters of personal protective equipment to be used in cases where the prevention or adequate reduction of risks in the workplace cannot be achieved by collective protection or work organization or working methods based on technical measures.
- Regulation on the Procedures and Principles of Employee's OHS Training: The purpose of this regulation is to regulate the procedures and principles of OHS training to be given to employees.
- Regulation on OHS in Construction Works determines the framework for the minimum OHS requirements for construction works.

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There are also more regulations such as on “noise control”, “dust control” or “control of chemicals” where the permissible limits were defined, and some organizational ones such as regulation on “shift work”, “occupational hygiene measurements, test and analysis”, etc.

Policies (according to OHS Directive of MoTI)

- Prevention of occupational risks
- Protection of health and safety
- Elimination of risk and accident factors
- Training, informing, obtaining opinions and participation of all employees and their representatives on OHS.
- To determine the general principles and other issues related to the working conditions of persons who need special protection due to their age, sex and special circumstances.

Identification of Potential Hazards to Protect Workers, Particularly from Life Threatening Ones and Implementation of Preventive and Protective Measures

Per articles 4, 6 and 22 of OHS Law, employers are under the obligation to: (1) take the measures necessary to protect the health and safety of workers, including prevention of occupational risks, and provide relevant trainings; (2) monitor and check compliance with the undertaken OHS measures and ensure that nonconforming situations are eliminated; (3) carry out a risk assessment or have one carried out; (4) take into consideration a worker's capabilities as regards health and safety when assigning tasks to the worker; (5) take appropriate measures to ensure that workers, who have not received adequate information and instructions, are denied access to areas where there is a life-threatening or special hazard; (6) appoint occupational safety experts, occupational physicians, and other medical personnel; (7) provide the requisite equipment; and (8) establish an OHS unit; all employers with more than 50 employees are required to establish an OHS committee.

Training of Project Workers and Maintenance of Training Records

Workers and workers' representatives have to be informed about OHS risks and preventive measures relating to their work, as well as their rights and responsibilities (Article 16, OHS Law). Furthermore, employers shall make sure that employees are trained in safety and health before they start working or when changes are made to the type of work carried out or to the technologies or the equipment used. Additionally, workers, who have had an occupational accident or disease, shall receive additional training on causes of the accident or disease, ways to protect themselves, and safe working methods. Similarly, workers who have been absent from work for any reason over six months, shall undergo retraining before resuming work. Time spent on trainings shall be reckoned as worktime. Therefore, if the time allocated for trainings exceeds weekly working hours, hours worked in excess of weekly working hours shall be considered overtime (Article 17, OHS Law). Where workers do not speak Turkish, OHS trainings and related materials shall be provided in a language and manner they can understand, including through translated materials, visual aids, or practical demonstrations, as appropriate.

Contracted workers may not perform hazardous work until they provide proof that they have received the requisite training (Article 17, OHS Law).

The employer shall ensure that the employees participate in the OHS training programs and that the participation is recorded and maintained with the Training Participation Report (Article 5, Regulation on the Procedures and Principles of Employee's OHS Training).

Documentation and Reporting of Occupational Accidents, Diseases, and Incidents

Pursuant to Article 14 of Occupational Health and Safety Law;

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(1) The employer shall;

- keep a record of all occupational accidents and occupational diseases, conduct the necessary investigations, and prepare reports related to them.
- investigate incidents that occur in the workplace which, although not causing injury or death, result in damage to the workplace or work equipment, or have the potential to cause damage to the employee, workplace, or work equipment, and shall prepare reports related to them.

(2) The employer shall notify the Social Security Institution within the period specified below:

- Occupational accidents, within three working days following the accident.
- Occupational diseases reported to the employer by healthcare providers or the workplace physician, within three working days from the date they are learned.

(3) The workplace physician or healthcare providers shall refer cases for which they have made a preliminary diagnosis of an occupational disease to healthcare providers authorized by the SGK.

(4) Healthcare providers shall notify the SGK of occupational accidents reported to them, and authorized healthcare providers shall notify the Institution of diagnosed cases of occupational disease, within no later than ten days.

Emergency Prevention and Preparedness and Response Arrangements to Emergency Situations

Employers shall designate a sufficient number of persons adequately trained in and equipped for prevention, protection, evacuation, firefighting, first aid, and other related issues considering the size and specific hazards of the undertaking, nature of the activities, number of employees, and other persons present in the workplace. The number of such workers and their training and equipment available to them shall be adequate and employers shall arrange emergency drills and trainings and make sure that the rescue teams are available to respond at all times (Article 11, OHS Law).

In the event of a serious, imminent and unavoidable danger, employers shall take appropriate actions, cease operations and instruct their employees to leave the workplace and move to a safe place. Employers may ask only workers, who are adequately trained and equipped and specially assigned, to resume work. In the event of a serious and imminent danger, employers shall ensure that all employees are able to take the appropriate actions to avoid the consequences of such danger if their immediate supervisors cannot be contacted (Article 17, OHS Law).

Remedies for Adverse Impacts, Such as Occupational Injuries, Deaths, Disabilities and Diseases

Employees incapacitated for work due to an injury, work-related injury, disease or occupational disease are entitled to (1) a daily temporary incapacity allowance during the period of temporary incapacity to work; and (2) if appropriate a permanent incapacity benefit. Furthermore, survivors of insurance holders who died due to a work accident or an occupational disease are entitled to specific benefits (Articles 16, 17, 18, 19 and 20, Social Insurance and General Health Insurance Law).

If a work accident or an occupational disease was the employer's or employees' fault, the SGK shall collect from the employers the sum of benefits it had paid to the insurance holders or their survivors (Article 21, Social Insurance and General Health Insurance Law). Employees are entitled to a disability pension under specific conditions, when permanent disability occurs (Article 26, Social Insurance and General Health Insurance Law). The determination of fault and liability is based on the findings of official accident and occupational disease assessments conducted in accordance with national legislation.

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OHS Risks Which May Be Specific to Female Workers

In Türkiye, women may not be employed to perform underground or underwater work in e.g., mines, sewers, and tunnels (Article 74, Labor Law). Only women over 18 may work nightshifts, the duration of which may not exceed 7.5 hours and they must be provided with safe transportation to their homes after nightshifts (Article 72 of the Labor Law and Articles 1 and 5 of the Regulation on Working Conditions at Night for Female Workers). Furthermore, pregnant and breastfeeding employees are prohibited from working at night from the beginning of pregnancy until one year after they give birth (Article 9, Regulation on Working Conditions at Night for Female Workers). Also, according to the Regulations on Overtime and Extra Hours, pregnant and breastfeeding employees may not be required to work overtime (Article 8). The Law does not have a balanced representation of women on OHS committees.

Procedures to Establish and Maintain a Safe Working Environment

Per Articles 4, 6 and 22 of OHS Law, employers are under the obligation to, among other things take the measures necessary to protect the health and safety of workers, including prevention of occupational risks, and provide relevant trainings, monitor and check compliance with the undertaken OHS measures and ensure that nonconforming situations are eliminated, carry out a risk assessment or have one carried out, take into consideration a worker's capabilities as regards health and safety when assigning tasks to the worker, take appropriate measures to ensure that workers, who have not received adequate information and instructions, are denied access to areas where there is a life-threatening or special hazard, appoint occupational safety experts, occupational physicians, and other medical personnel, provide the requisite equipment, and establish an OHS unit. Additionally, all employers with more than 50 employees are required to establish an OHS committee.

Right and Responsibility to Report Unsafe Situation, Right to Leave the Workplace and Prohibition of Retaliation for Reporting

Workers exposed to a serious, imminent and unavoidable danger are entitled to refuse to work, to leave the workplace and seek shelter in a safe space. They should not be placed at any disadvantage as a result of their decision (Article 13, OHS Law).

Workers exposed to a serious and imminent danger should immediately report it to the OHS committee or, in the absence of the committee, to the employer. If the committee or employer believes that there is existence of a risk, the employees may leave the job until necessary mitigation measures have been taken. Employees may terminate employment if the employer fails to take the necessary measures (Article 13, OHS Law).

Collaboration and consultations with project workers on OHS

According to the Article 16 of OHS Law, employers have to ensure that contractors inform their workers about OHS risks and measures, as well as their rights and responsibilities. Two or more employers sharing a workplace shall cooperate in implementing OHS measures and maintaining occupational hygiene (Article 23, OHS Law).

Article 10 of "Regulation on Occupational Health and Safety in Construction Works" specifies the necessity of OHS plan in Construction works.

The law does not require a balanced representation of women in OHS committees.

Facilities for Workers

Provisions applying to the workplace apply also to all premises used by reason of the nature and execution of the work and organized under the same management, including all facilities annexed to the establishment, such as rest rooms, nurseries, cafeterias, dormitories, bathrooms, rooms for medical examination and nursing, places for physical and vocational training and courtyards, as well as company vehicles (Article 2, Labor Law). Canteens and other food facilities should be provided in establishments with at least 150 employees (Article 115, Labor Law).

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Standards for accommodation of construction workers

According to Regulation on OHS in Construction Works (Appendix-4:59-65); accommodation places for workers:

- should be non –flammable
- should be away from hazards created by the construction work
- have heating, cooling and ventilation systems, electrical installations and lighting systems
- have sufficient width and sufficient number of tables and chairs, enough bedsteads, beds, blankets, a recreation room
- have an adequate shower, toilet, washbasin and cleaning equipment etc.

System for Regular OHS Review

Per Articles 4, 10 and 17 of OHS Law, Employers have to carry out regular risk assessments and take appropriate measures to ensure that only workers who have received adequate information and instructions have access to areas where there is a life-threatening or special hazard.

3.3 World Bank Requirements

The Environmental and Social Standard ESS2 on Labor and Working Conditions within the World Bank's Environmental and Social Framework (ESF) acknowledges the significance of maintaining positive worker-management relationships and fostering project development through fair treatment of workers and the provision of safe and healthy working conditions. The existing national legislation in Türkiye already adequately addresses working conditions, worker relationship management, workforce protection, and OHS, satisfying the stipulations of ESS2. Therefore, these aspects will not be reiterated in this LMP. Instead, the LMP will focus on additional requirements of ESS2 applicable throughout the project life cycle, including:

- **Categorization of Project Workers:** Differentiating between direct, contracted, and primary supply workers and applying ESS2 requirements to each category accordingly.
- **Risk Assessment and Mitigation:** Evaluating risks arising from interactions between project workers and local communities and implementing proper mitigation measures, including the adoption of a formal code of conduct.
- **Documentation for Project Workers:** Providing clear and understandable documentation outlining the terms and conditions of employment at the commencement of the working relationship. For migrant workers, reasonable measures will be taken to ensure that such documentation is understandable, including through translation or other appropriate communication methods. For workers who may face challenges in reading or understanding the documentation (e.g., migrant workers), additional oral explanations will be provided to support comprehension and documented through meeting records or notices on workers' bulletin boards.
- **Workers' Grievance Mechanism (WGM):** Establishing a WGM for all direct and contracted workers, informing them about it during recruitment, displaying relevant information on noticeboards, and implementing measures to protect workers from reprisals for using the WGM. The mechanism will be easily accessible to all project workers.
- **OHS Measures:** Incorporating OHS measures that adhere to both national legislation and ESS2. Consideration will be given to the General Environmental Health and Safety Guidelines (EHSG) and, when applicable, industry specific EHS Guidelines and other Good International Industry Practices (GIIP).

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- Reporting of Occupational Fatalities or Serious Injuries: Mandating that in the event of an occupational fatality or serious injury, contractors must promptly report to AYGM and AYGM will, in turn, report to the World Bank upon notification by the contractor. Similar reporting obligations extend to subcontractors and primary suppliers.

In addition, the Project will follow the General EHS (2007) and the sector-specific EHS Guidelines for Railways, as issued by the World Bank Group/IFC. These guidelines provide GIIP for the management of OHS risks. Key topics include:

- Hazard identification and risk assessment
- Provision and use of PPE
- Emergency preparedness and response
- Training and awareness programs for workers
- Safe work practices and site security
- Monitoring and incident reporting

These requirements will be included in bidding documents and contracts with D+B contractors.

The EHSs are publicly accessible at: <https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines>.

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4 RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (i) engagement and management of project workers, (ii) engagement and management of contractors/subcontractors, (iii) OHS, (iv) training of workers, (v) addressing worker grievances. Responsibilities are shared among AYGM PIU, D+B Contractor(s), and the CSC to ensure effective implementation of labor and working conditions requirements throughout the Project lifecycle.

4.1 AYGM PIU

For this Project, a Project Implementation Unit (PIU) will be established under AYGM. Among other specialists, the PIU will include a Social Specialist with relevant experience in handling SEA/SH risks and an OHS Specialist who will be responsible for the implementation and monitoring of this LMP throughout the Project lifecycle. The PIU will:

- Apply this LMP to direct workers engaged by the Project.
- Maintain records of recruitment and employment processes for direct workers.
- Ensure that this LMP is included in the bidding and contractual documentation and that the D+B Contractor(s) prepare, submit, adopt, and implement Contractor Labor Management Plans (LM Plans) and OHS Plans responsive to the requirements of this LMP prior to the commencement of construction works.
- Review and approve Contractor LM Plans and OHS Plans prior to construction commencement, subject to the World Bank's no-objection requirements where applicable.
- Monitor and report on implementation of Contractor LM Plans.
- Monitor that D+B Contractor(s) fulfil their obligations towards contracted and subcontracted workers in accordance with contract requirements, ESS2, Turkish Labor Law and OHS legislation. Monitor employment processes of contracted workers to ensure compliance with this LMP and applicable labor legislation.
- Ensure that the CSC adequately supervises contractor compliance with OHS requirements, including site inspections, identification of non-conformities, and verification of corrective actions.
- Ensure that project workers receive induction and periodic training on OHS, labor rights, SEA/SH prevention, grievance procedures, and the Code of Conduct.
- Ensure that a Worker Grievance Mechanism (WGM) is established and effectively implemented.
- Ensure that a dedicated SEA/SH grievance mechanism is established and implemented in accordance with survivor-centred principles.
- Monitor implementation of workers' Code of Conduct requirements.
- Establish procedures for documenting occupational injuries, illnesses, fatalities, lost-time incidents, labor grievances, worker accommodation incidents, and SEA/SH incidents, and require contractors and subcontractors to maintain equivalent records.
- Implement disciplinary measures in cases of SEA/SH misconduct.
- Ensure timely notification and reporting of significant labor, OHS, SEA/SH, worker accommodation, forced labor, trafficking, and other serious incidents to relevant authorities, the World Bank, as applicable.
- Ensure that labor management requirements are consistently implemented across all contractors and subcontractors, including multi-tier subcontracting arrangements.
- Oversee implementation of labor monitoring and reporting systems, including review of workforce data, labor grievances, labor incidents, corrective actions, accommodation inspections, and contractor performance indicators.
- Review and consolidate periodic labor monitoring reports submitted by contractors and subcontractors.
- Ensure that contractors maintain adequately qualified labor, OHS, SEA/SH, and E&S personnel throughout the Project lifecycle.

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- Monitor implementation of worker grievance mechanisms and verify accessibility to all categories of project workers, including contractor, subcontractor, CSC, PMC, and PIOC personnel.
- Oversee compliance with labor recruitment requirements, including the prohibition of child labor, forced labor, recruitment fees, retention of identity documents, debt bondage, human trafficking, and other exploitative labor practices.
- Ensure that worker accommodation standards are implemented, monitored, and enforced in accordance with this LMP and applicable WB and good international practice requirements.
- Ensure that periodic inspections and audits of worker accommodation facilities are conducted and corrective actions are implemented within agreed timeframes.
- Review labor-related incidents, trends, audit findings, corrective actions, and contractor performance results and ensure lessons learned are applied across the Project.
- In instances of medium, severe, fatal, or mass accidents, inform relevant authorities, the Labor Inspectorate, the World Bank in accordance with applicable reporting requirements.

4.2 Construction Supervision Consultant

The Construction Supervision Consultant will oversee labor and safety performance daily, on behalf of the AYGM. The ESIA Report requires the Supervision Consultant to employ qualified experts for such oversight and to report on performance to AYGM monthly.

The social and OHS Specialists of PIU will work in close coordination with the CSC's social and OHS Specialists. Coordination will be ensured through joint site inspections, review of monthly contractor and CSC reports (by PIU), weekly coordination meetings, capacity building activities provided by PIU's specialists to CSC's specialists.

The roles and responsibilities of CSC's specialists regarding the implementation, monitoring and reporting of LMP are listed below:

- Review the LM Plan and OHS Plan to be prepared by the D+B Contractor(s) including all updates and revisions at frequencies specified in the D+B Contractor(s)'s contract.
- Undertake, as required, audits, supervisions and/or inspections of any sites where the D+B Contractor(s) is undertaking activities under its contract, to verify the Contractor's compliance with ESS2 and EHSG requirements (including relevant requirements on SEA/SH);
- Undertake audits and inspections of D+B Contractor(s)'s accident logs, monitoring findings and other ESS2 and EHSG related documentation, as necessary, to confirm the D+B Contractor(s)'s compliance with ESS2 and EHSG requirements (including relevant requirements on SEA/SH);
- Determine remedial action/s and their timeframe for implementation in the event of a noncompliance with the D+B Contractor(s)'s ESS2 and EHSG obligations;
- Ensure appropriate representation at relevant meetings including site meetings, and progress meetings to discuss and agree appropriate actions to ensure compliance with ESS2 and EHSG obligations;
- Ensure that the D+B Contractor(s)'s actual E&S (including OHS) reporting (content and timeliness) is in accordance with the D+B Contractor(s)'s contractual obligations and these reports are shared with PIU in a timely manner.
- Review and critique, in a timely manner, the D+B Contractor(s)'s ESS2 and EHSG documentation (including regular reports and incident reports) regarding the accuracy and efficacy of the documentation.
- Immediately notify the AYGM PIU of any failure by the D+B Contractor(s) to comply with its SEA and SH obligations;
- Ensure that project workers receive training on SEA/SH prevention and CoC at the start of the employment through regular review of records and training plans and monitor

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SEA/SH prevention measures implementation during the life of the project through site visits.

- Ensure and monitor training of the project workers on OHS, and any other required trainings through regular review of records, site visits, review of training plans.
- Ensure that the WGM is established, and monitor and report on its implementation.
- In instances of medium, severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate and the PIU.

4.3 D+B Contractor(s)

The D+B Contractor(s) will be responsible for the following:

- Employ or appoint qualified social, labor, and occupational safety experts to prepare and implement project specific LM Plan, OHS Plan, and to manage subcontractor performance.
- Develop their own LM Plan and OHS Plan, consistent with this LMP and ESS2, which will apply to contracted and sub-contracted workers. These plans will be submitted to the CSC for review and approval before the contractors mobilize for the design stage.
- Ensure full implementation of this LMP across all subcontractors and supply chain entities
- Include binding provisions in all subcontractor agreements requiring compliance with this LMP, ESS2, and applicable national legislation
- Monitor and enforce subcontractor compliance with labor requirements, including worker accommodation, labor standards, grievance mechanisms, and reporting obligations
- Maintain records of recruitment and employment process of contracted workers. Clearly communicate job description and employment conditions to contracted workers and provide them with one copy of the employment contract. For migrant workers, reasonable measures will be taken to ensure that this information is understandable, including by providing the contract or written materials explaining key terms and conditions in a language they can understand.
- Develop, implement, and maintain WGM and address the grievance received from the contracted and sub-contracted workers.
- Report on WGM implementation to the CSC and the AYGM.
- Maintain a centralised grievance log covering all workers, including subcontractors, and conduct periodic analysis of grievance trends to identify systemic issues and implement corrective measures.
- Have a system for regular review and reporting on labor and OHS performance. Deliver regular work induction training including but not limited to OHS, health, safety and environment (HSE), social induction, training to employees.
- Ensure that all contractor and sub-contractor workers understand and sign the CoC prior to the commencement of works.
- Ensure that contracted and sub-contracted worker receive training on SEA/SH prevention and CoC at the start of the employment and monitor SEA/SH prevention measures implementation during the life of the project.
- Establish and implement a procedure for documenting specific incidents such as project-related occupational injuries, illnesses, lost time accidents and incidents related to sexual exploitation and abuse and sexual harassment. Maintain such records and require all third parties and primary suppliers to maintain them. Such records will form an input into the regular review of OHS performance and working conditions.
- Prepare and submit periodic labor monitoring reports, including workforce composition, working hours, OHS data, accommodation conditions, and grievance statistics, in line with Project reporting requirements.
- Conduct regular inspections of worker accommodation facilities and maintain records of inspection findings, non-compliances, corrective actions, and completion status.

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- Maintain labor monitoring records, including workforce composition, worker accommodation inspections, training records, labor incidents, worker grievances, corrective actions, and subcontractor performance information.
- Implement and monitor corrective actions arising from inspections, audits, labor monitoring activities, grievance investigations, incident investigations, and worker accommodation inspections within agreed timeframes.
- Implement disciplinary measures in instances of SEA/SH misconduct.
- In instances of medium, severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate, CSC and the PIU.

After the bidding process is completed and the D+B Contractor(s) are known, this LMP can be updated to include additional details about firm(s), as necessary.

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5 POLICIES AND PROCEDURES

The Project will adhere to the labor management, occupational health and safety (OHS), accommodation, monitoring, and reporting requirements set out in this Section, in line with national legislation, World Bank ESS2 and Good International Industry Practice.

OHS Plans

The following OHS standard requirements should as a minimum be included in the OHS Plans to be prepared by the D+B contractors:

- Risk Assessment Procedure. In accordance with Article 10 of the OHS Law and the Regulation on Risk Assessment, a specific risk assessment document will be prepared for each job type, including hazard identification and mitigation measures.
- Incident notification and reporting procedures. Procedures will be established for the immediate notification, investigation, recording, and reporting of occupational injuries, illnesses, near misses, lost-time incidents, fatalities, dangerous occurrences, worker strikes and significant labor disputes, incidents of child labor, forced labor, trafficking in persons, SEA/SH incidents, and other significant labor, welfare, accommodation, security or OHS incidents, in accordance with project reporting requirements and applicable legislation.
- Work permitting for hazardous work (working at heights, hot work, work on energized lines, work within confined spaces etc. As per the Regulation on Health and Safety Conditions in the Use of Work Equipment, written work permits must be issued for high-risk work.
- Golden rules³ for life threatening works. For railway works, special attention will be given to working in electrified environments, including proximity to high-voltage catenary lines, and implementing track possession and isolation procedures where applicable.
- Emergency response procedure. Emergency Action Plans will be prepared in line with the Regulation on Workplace Emergency Situations, including scenarios for fire, natural disasters, and toxic releases.
- Fall prevention and working at heights. This will include specific protocols for viaducts, bridges, and signal towers used in railway construction. Measures will comply with the Communiqué on Working at Heights. Collective protection systems (e.g., guardrails, scaffoldings) and PPE will be mandatory.
- Excavation, ladders, and scaffolders safety; welding and cutting safety; cranes, derricks, and forklifts safety; power and hand tools safety. In railway works, trenching for cable ducts, subgrade excavation and ballast layering will be conducted with strict slope stabilization and shoring techniques.
- Respiratory prevention to chemical and airborne hazards (including dust, silica, and asbestos). Control of exposure to chemicals, dust, and asbestos will follow the Regulations on Health and Safety Precautions for Working with Carcinogenic or Mutagenic Substances and the Regulation on Chemical Agents.
- Electrical safety (hazardous energies control, lock out tag out, energy verification, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, Electrical safety, PPE, and dielectric tools); hazards communication; steel erection safety; fire safety; concrete and masonry safety. For railway construction, lock

³ Golden rules usually address issues such as work at heights, work in confined spaces, excavation work, PPE, system of work permits, lifting, working on powered systems, traffic, work in high-risk situations, etc. Employers should define their Golden rules in accordance with the nature of work.

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out / tag out (LOTO) procedures will also cover signal systems and catenary power lines. All staff working near energized tracks will receive task-specific electrical safety training.

- Noise and vibration safety. Based on the Regulations on Protection of Employees from Noise and Vibration, regular exposure measurements will be conducted, and control measures (engineering or PPE) will be taken where limits are exceeded.
- Material handling and storage safety. Special protocols will be followed for the safe handling and storage of rails, sleepers, switch components and pre-stressed concrete elements.
- Railway-Specific Traffic Safety. Traffic safety measures will be implemented at crossings, sidings, and along active rail corridors to prevent conflicts between construction crews and train operations. Safety marshals and signaling will be used during track works.
- Construction PPE. According to the Regulation on the Use of Personal Protective Equipment in Workplaces, suitable PPE will be selected, distributed, and tracked for all employees.
- OHS training. In accordance with Article 17 of OHS Law and the Regulation on OHS Training, mandatory initial and periodic trainings will be conducted for all employees.
- Occupational health surveillance. Per the Regulation on Workplace Physicians and Other Health Personnel, regular medical examinations will be ensured to verify fitness for duty.
- Refuse to work policy. Article 13 of OHS Law grants employees the right to stop work in case of imminent danger. This right must be formally implemented in D+B Contractor(s) procedures.

These standard requirements will be prepared in consistent with national OHS legislation, the World Bank Group (WBG) EHSGs and GIIPs.

PIU will include into the bidding documents these OHS standard requirements that all D+B contractors and sub-contractors will meet under this Project. The CSC will review and approve D+B contractors' safety plans and procedures. OHS management will include regular monitoring, performance tracking, and reporting in line with Project labor monitoring requirements.

OHS Staff

In addition, OHS plans, will among other issues, include the following: the D+B contractor(s) will define an OHS accountability matrix for all staff including Project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities. Each D+B Contractor must have its own qualified OHS staff that will be responsible for the implementation and supervision of the OHS program.

Risk Assessment

All D+B contractors are required to develop risk assessment analysis to identify hazards and OHS risk at the workplace. The D+B contractors will develop risk management plans, including Risk Assessment Procedures, to mitigate OHS risks to be cleared by CSC. The procedure should aim to establish and maintain a safe working environment, including that workplaces, machinery, equipment, and processes under their control are safe and without health risk. The D+B Contractors must keep the training records.

Safety Standards and PPE

D+B Contractor(s) will provide a safe workplace; therefore, a risk assessment will be completed before the commencement of any construction activities, and safety measures will

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be implemented in accordance with applicable safety standards WB guidelines and national legislation. All employees will strictly follow Golden rules for life threatening works (OHS rules that cannot be broken under any circumstances), which will be enforced under contractual matrix of consequences (see draft ESMP of INRAIL). The employer will provide special clothing, footwear, and other PPE to employees free of charge. Such PPE is to be delivered to employees involved in work related to the elimination of the consequences of accidents and natural disasters. When the PPE is dysfunctional, the employer is obliged to replace PPE at their own expense without the employee's responsibility. If the employee purchases PPE at their own expense, the employer is obliged to reimburse such costs.

All contracts between AYGM and contractors will include a provision explicitly stating that continuous violation of OHS measures will result in contract cancellation. Contractors/subcontractors are required to incorporate this provision into their employment contracts with workers, specifying that continuous violation of OHS measures will lead to termination of employment.

OHS Trainings

The employer is responsible for providing OHS training to employees in language understandable to the workers before the work is commenced on:

- General principles of health and safety.
- Working procedures, equipment, machinery, and manual and instructions for the use and repair of work equipment.
- Emergencies and evacuation plans, and their implementation activities.
- Existing threats and risks and on measures to be taken with regards to overcoming such situations.

D+B contractors will control the access to the construction site only to authorized people and verify if workers are meeting training and accreditation requirements in accordance with the set training standards and applicable regulatory requirements⁴ (i.e., workers must be trained to perform hazardous works such as working at heights, confined spaces, welding etc.). All workers must complete at minimum an OHS induction to have access to the construction site.

Contractors will submit periodic (monthly and quarterly) reports to the CSC and PIU. A centralised system will be maintained to track labor performance and identify trends, including recurring grievances and systemic issues.

OHS Committee

There will be a construction OHS committee with representatives of employees, AYGM, D+B contractor(s) and all subcontractors.

Given the size, geographic spread, and complexity of the Project, section-specific OHS Committees will be established by the D+B Contractors for their respective work areas, in line with national OHS legislation, to address location-specific risks and work activities. These committees will convene on a monthly basis, as required by applicable legislation.

Measures will be taken to promote inclusive representation within OHS Committees, including encouraging the participation of female workers, raising awareness on gender equality in OHS processes, and considering gender balance in the nomination of employee representatives, where feasible.

⁴ In Türkiye, the performance of high-risk and specialized work—such as operating heavy vehicles, cranes, and electrical systems—requires mandatory certification and licensing in accordance with national legislation. Truck drivers must possess the appropriate class of driver's license (e.g., C, CE, or D class) and, in the case of transporting hazardous materials, additional certification such as the SRC 5 and ADR license. Crane, forklift, and other lifting equipment operators must hold valid operator certifications issued by authorized institutions such as the Ministry of National Education or the Vocational Qualifications Authority. Similarly, electricians are required to hold an Electrician License or equivalent qualification and, where applicable, be trained for high-voltage operations in accordance with the Electrical High Current Facilities Regulation. All such certifications are part of employers' due diligence obligations under Türkiye's OHS Law No. 6331.

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Biweekly, OHS meetings will be conducted to discuss preventive measures, deviations and non-compliances, accidents, and corrective actions. D+B contractors will conduct internal OHS surveys and audits to verify compliance of OHS practices. Non-compliances will be documented and reported internally. A time frame for a corrective action will be set and followed up. Daily OHS briefings will be conducted before the commencement of the works highlighting the hazards and preventive measures from each job. D+B contractors will document and report to AYGM all accidents and illnesses with a day lost or more, fatalities or serious injuries that may happen at the work site.

First Aid

There must be on site resources for first aid and for more serious injuries. Furthermore, there must be medical doctors on site and a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers.

Code of Conduct (CoC)

The CoC reflects the company's core values and overall working culture. The content of the CoC is included in the World Bank Standard Procurement Document and includes provisions relating to SEA/SH prevention. It is also presented in Annex-2. The D+B contractor will develop and implement CoC.

Training sessions will be conducted as needed for all D+B contractors' and subcontractors' workers to ensure understanding and application of the CoC and the stated principles. Each worker is required to sign the CoC, indicating that they have received, understood, and acknowledged it as a mandatory condition of employment. For non-Turkish speaking workers, reasonable measures will be taken to ensure understanding of the CoC, including through translation into relevant languages and the provision of accompanying trainings or explanations, as appropriate. The CoC will be prominently displayed in a readily accessible location(s) by workers.

Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)⁵

Project workers are prohibited to commit any acts of SEA/SH. To address SEA/SH risks:

- Project workers will be required to sign CoC at the start of employment.
- SEA/SH prevention training will be provided for all project workers at induction, with regular refreshers throughout the project cycle.
- A dedicated, confidential SEA/SH grievance mechanism, separate from the general WGM, operated by trained personnel is established (see Section 8.1) and described in the SEP—which will be made publicly available—to ensure that all project workers are informed about how to submit a SEA/SH-related grievance and that confidentiality will be maintained.
- Implementation of SEA/SH mitigation measures will be monitored through the CSC.
- SEA risk mitigation will be integrated in community engagement activities to ensure that affected groups are aware of their rights and reporting channels.
- The workers' grievance mechanism will be accessible to all project workers, including those employed by contractors and subcontractors.
- Grievances may be submitted anonymously and will be handled in a confidential manner. All grievances will be recorded and tracked through a centralised system.
- Further details on the grievance mechanism procedures are provided in Section 8 of this LMP.

⁵ Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6). Sexual abuse is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5). Sexual harassment is any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.

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These measures will be refined as part of the D+B Contractors' LM Plans and will be consistent with the World Bank ESS2, ESS4, the World Bank's Good Practice Note on SEA/SH for major civil works.

Forced Labor

All employment relationships will be formalized through SGK, and CSC will require contractors to demonstrate full legal registration of workers and adherence to labor rights. Moreover, workers will receive training on forced labor, contractors will be contractually obliged to conduct regular audits of their subcontracting chain and provide access to WGM that allow anonymous reporting of forced labor. Contractors will ensure that monitoring mechanisms are in place across subcontractors to identify and address risks related to forced labor. Contractors will also prohibit the charging of recruitment fees, retention of identity documents, debt bondage, and any form of human trafficking throughout their operations and subcontracting chains.

Working Hours

The risk of exceeding working hours in violation of Law No 4857 will be regulated through the WGM and regular audits. Clauses stipulating termination of the contractor's contract in case of persistent non-compliance will be incorporated into the contractual agreements to control the risk of overworking. Compliance with working hours will be regularly monitored and reported as part of labor performance tracking.

Labor Influx

The project will require D+B contractor(s) to implement CoC and appropriate labor camp standards. The D+B contractor(s) will prepare a Labor Influx Management Plan prior to commencement of works as part of their C-ESMP, and the project's SEA/SH mitigation strategy. These plans will involve sensitization and awareness campaigns among the project workers and the local community, including but not limited to CoC and grievance mechanism. The influx of non-local workers, even if relatively contained, will be monitored through CSC and periodic community engagement carried out by PIU. Where worker accommodation facilities are established, their management and operation will be undertaken in accordance with the accommodation requirements set out in this LMP and applicable international good practice standards.

Labor Audits

Periodic labor audits will be conducted to assess compliance with this LMP, and applicable national legislation.

These audits may include independent third-party audits, particularly for high-risk labor areas such as worker accommodation, subcontractor management, and grievance mechanisms. Each audit will result in a corrective action plan with defined timelines. Failure to implement corrective actions within agreed timelines may result in enforcement measures. Audit findings, corrective actions, and implementation status will be documented and tracked to closure through the project's labor monitoring and reporting system.

5.1 Workers' Accommodation

Accommodation areas will be established for workers employed within the scope of the project. For the construction of accommodation areas, international requirements and standards will be followed as well as good implementation practices, which are summarized in this section.

5.1.1 Standards for Worker Accommodation

5.1.1.1 General Living Facilities

Ensuring high living standards is essential for workers' safety and well-being. This includes preventing health risks such as humidity, stagnant water, and pests, while supporting morale.

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Housing should be located safely, reduce commuting time, and use quality materials with proper cleanliness. Fire safety measures, extinguishers, alarms, staircases, exits, and restricted materials, will be in place, with evacuation plans clearly displayed.

Drainage: Workers' resting and housing areas will be set up in a levelled, well-protected location with proper drainage to prevent stagnant water and ensure health standards, avoiding disease vectors like mosquitoes and flies.

Lighting, Heating, Ventilation, and Air Conditioning: Heating, cooling, and ventilation systems in residential areas will follow safety precautions for electrical installations and lighting, avoiding fire hazards. Open flames will not be used. Both natural and artificial lighting will be provided and maintained, with windows covering 5% to 10% of the floor area. Emergency lighting systems will be installed as required. Ventilation will be adapted to climatic conditions to ensure a comfortable and healthy environment for workers.

Water Supply: Workers will have continuous access to clean water to prevent water loss, poisoning, and hygiene-related diseases. Buildings will be supplied with potable water meeting TS266/T1:2014 or WHO standards. Each worker will receive 80 to 180 liters of water daily, depending on conditions. If storage tanks are used, they will be enclosed to prevent contamination. Water quality will be monitored regularly.

Wastewater and Household Solid Waste: Compliance with legislation for wastewater treatment, discharge, and solid waste management will be ensured to prevent contamination and maintain hygiene standards. Wastewater from construction activities will be treated and discharged per permit. Solid waste will be collected by the municipality and disposed of at integrated facilities. Covered containers will be used for garbage collection, placed 30 meters from accommodation facilities, and emptied regularly to prevent odours. Pest control and disinfection procedures will be carried out according to legal provisions.

5.1.1.2 Room/Dormitory Facilities

Rooms or dormitories are crucial for ensuring workers rest adequately and maintaining hygiene standards. Overcrowding will be avoided, as it impacts on workers' productivity and reduces work-related accidents. It is crucial to ensure that workers have enough and hygienic sleeping and resting quarters, which include having an adequate quantity of beds that are suitable. Privacy will be taken into special consideration.

The rooms/dormitories should be kept clean and in a good condition. Exposure to noise and odour should be minimized. In addition, room/dormitory design and equipment should strive to offer workers a maximum of privacy. Dormitories and rooms must be single-sex.

The provision of adequate numbers of beds of an appropriate size is essential to provide workers with decent, safe and hygienic conditions to rest and sleep.

- Rooms/dormitories should be built with easily cleanable flooring material and should be aired at regular intervals.
- Density standards should be expressed either in terms of minimal volume per resident or of minimal floor space. Usual standards range should be from 10 to 12.5 cubic meters (volume) or 4 to 5.5 square meters (surface). A minimum ceiling height of 2.10 meters should be provided.
- In collective rooms, which are minimized, in order to provide workers with some privacy, only a reasonable number of workers are allowed to share the same room. Standards range should be from 2 to 6 workers.
- All doors and windows should be lockable, and provided with mosquito screens where conditions warrant.
- There should be mobile partitions or curtains to ensure privacy.
- Every resident should have adequate furniture such as a table, a chair, a mirror and a bedside light.

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- A separate bed with comfortable mattress, pillow, cover and clean bedding for each worker should be provided. There should be 1-meter minimum space between beds.
 - Bed linen is washed frequently and applied with repellents and disinfectants where conditions warrant.
 - Double deck bunks are not advisable for fire safety and hygiene reasons, and their use is minimized. Where they are used, there must be enough clear space between the lower and upper bunk of the bed. Standards range should be from 0.7 to 1.10 meters.
 - Triple deck bunks are prohibited.
- Facilities for the storage of personal belongings for workers are provided. Standards vary from providing an individual cupboard for each worker to providing 475-litre big lockers and 1 meter of shelf unit.
- Separate storage for work boots and other personal protection equipment, as well as drying/airing areas.
 - All outside premises, floors, hallways, walls, ceilings and appurtenances will be maintained in a sanitary condition at all times. Each room will be completely cleaned after each change of occupancy. Common areas will be cleaned at least once daily.
 - No cooking will be undertaken in any room of a habitable structure unless such room was specifically designed for this purpose.
 - Noise levels in habitable rooms will conform to the noise standards.
 - Hallways, entrances to fire escapes and stairways must be kept free of obstructions.

5.1.1.3 Sanitary and Toilet Facilities

Facilitating workers to maintain high standards of personal hygiene is crucial within the scope of the Project as it helps prevent the spread of diseases resulting from contamination and inadequate sanitation facilities. In cases where necessary, dedicated sanitary facilities will be provided for female workers. In addition, specific additional sanitary facilities where necessary are provided for women.

5.1.1.4 Canteen, Cooking and Laundry Facilities

Maintaining high hygiene standards in canteens, cafeterias, and food preparation areas is paramount. Adequate canteen, food preparation, and laundry washing areas and equipment will be provided. Kitchens and canteens will be operated by specialized contractors adhering to quality standards. These areas will be constructed with easy-to-clean materials and kept clean and hygienic, with adequate monitoring mechanisms in place.

Laundry Facilities: Ensuring personal hygiene includes washing work attire and special garments. A laundry service will be provided. Special arrangements will be made to meet workers' laundry needs, with separate washing machines used if work attire comes into contact with hazardous substances like pesticides, hazardous chemicals, or irritating insulation materials.

Canteen and Cooking Facilities: Canteens and cooking facilities will provide sufficient space for meal preparation and consumption while complying with hygiene and occupational safety requirements.

- Canteen, kitchen, cooking and laundry floors, ceilings and walls should be made of easily cleanable materials.
- Providing facilities for workers to wash both work and non-work-related clothes is essential for personal hygiene. Adequate facilities for washing and drying clothes should be provided. Standards range from providing sinks or tubs with hot and cold water, cleaning soap and drying lines to providing washing machines and dryers.
- When work clothes are used in contact with dangerous substances (for example, application of pesticides), special laundry facilities (washing machines) should be provided.

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- Canteen and cooking facilities should provide sufficient space for preparing food and eating, as well as conform to hygiene and safety requirements.
- Canteens should have from 1 square meter to 1.5 square meters space per worker. Canteens should be adequately furnished and tables, benches, individual drinking cups and plates to provide special drinking fountains should be provided.
- Places for food preparation should be designed to permit good food hygiene practices, including protection against contamination between and during food preparation.
- Kitchens should be provided with facilities to maintain adequate personal hygiene including a sufficient number of washbasins designated for cleaning hands with clean, running water and materials for hygienic drying.
- Wall surfaces adjacent to cooking areas are made of fire-resistant materials. Food preparation tables are also equipped with a smooth durable washable surface. Lastly, in order to enable easy cleaning, it is good practice that stoves are not sealed against a wall, benches and fixtures are not built into the floor, and all cupboards and other fixtures and all walls and ceilings have a smooth durable washable surface.
- All kitchen floors, ceiling and wall surfaces adjacent to or above food preparation and cooking areas should be built using durable, non-absorbent, easily cleanable, non-toxic materials. Wall surfaces adjacent to cooking areas should be made of fire-resistant materials. Food preparation tables should be equipped with a smooth, durable, easily cleanable, non-corrosive surface made of non-toxic materials. All cupboards and other fixtures have a smooth, durable and washable surface.
- Adequate facilities for cleaning, disinfecting and storage cooking utensils and equipment should be provided.
- All food handlers should be supplied with 2 pairs of uniforms, aprons, caps and safety shoes. They must maintain a clean, neat and tidy appearance, with short fingernails and hair. They must not wear jewelry while working.
- Food waste and other refuse should be adequately deposited in sealable containers and removed from the kitchen frequently to avoid accumulation.
- Food handling facilities will comply with the requirements of the applicable national food service sanitation ordinance/code.
- Smoking will be prohibited in all food handling areas (proper signs must be posted).
- Adequate number and type of fire extinguishers will be in place.
- There will be no direct opening from living or sleeping quarters into a kitchen or dining hall.
- No person with any communicable disease will be employed or permitted to work in the preparation, cooking, serving, or other handling of food, foodstuffs, or materials used therein, in any kitchen or dining room operated in connection with a camp or regularly used by persons living in a camp.
- All personnel involved in the handling of any food items must successfully pass a routine medical examination prior to beginning their assignment. Periodic examinations of food handlers, waiters, cooks, sewage handlers, etc. will be undertaken no less than as stated in relevant Turkish regulation, by an approved local laboratory. The doctor will make 'spot checks' and verify the reliability of analyses.
- Kitchen workers who have cuts or abrasions on or about their hands, whether bandaged or otherwise, will not be permitted to work in the preparation and/or serving of food until all such wounds have healed.
- All kitchen workers whose duties include the handling of food (either in preparation or in serving) will be required to pass hand inspection every morning. They will wash their hands with antibacterial soap before each time they touch food and after each time they have a break or leave their work area for any reason. Hairnets and other such protective measures will also be utilized. All kitchen workers will be trained in hygiene and food hygiene.
- Cooked and uncooked food must be segregated, labelled, and covered when stored.

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- Adequate drainage must be provided in all food preparation areas and all drains must be kept clean and functioning properly.
- All floors, walls, and ceilings in the kitchen and dining facilities will be kept clean and free of grease build-up and other debris.
- Lighting in the food preparation and service area will be adequate, functioning, and kept clean.
- Where deemed necessary, the proper type and amount of insect killing lights and devices must be in-stalled in kitchen and dining facilities.
- Where used, insect killing lights and devices must function properly and must be kept clean.
- Kitchen workers who are experiencing any gastrointestinal problems will not be permitted to work in the preparation and/or serving of food until they are healed.
- Food thermometers with probes or other such devices will be used to check and record temperatures of roasted meats and other food products prepared for the day.
- Samples of each prepared food item will be retained for 72 hours in a freezer and will be marked with date and time of preparation. These samples will be tested by an accredited laboratory in the event a food borne illness is reported at the project.
- Food in storage must be kept on steel or plastic shelves, racks, or pallets that provide at least a 15 cm clearance above the floor (wooden pallets or storage shelves are prohibited).
- Foods must be maintained and served at the correct temperatures. Regular temperature checks of the food service line must be made and recorded during mealtime hours.
- Cold display cabinets must be kept at the correct temperature (per manufacturer specifications) and must be kept clean.
- All perishable items must be monitored for proper date and disposal requirements.
- All food handlers must be trained in food hygiene and waste management and the project will ensure continuing training courses are provided.
- Properly sized and functioning ventilation hoods with suitable extractor fans must be fixed over cooking ranges and properly maintained in accordance with an established preventative maintenance schedule.
- Fish products and chicken products must either be placed in a separate freezer or in a separate compartment in a combined freezer.
- Refrigeration units must be kept clean and well organized at the correct temperatures (twice daily temperature checks and recordings must be made and posted on each freezer unit), as follows:
 - Frozen Food: $-18^{\circ}\text{C} \pm 2^{\circ}$ (-0.4°F).
 - Chilled/Refrigerated Food: $3^{\circ} - 5^{\circ}\text{C}$ ($37^{\circ} - 41^{\circ}\text{F}$)
- Up-to-date calibration certificates must be available for all measurement equipment (thermometers, scales, etc.) used kitchens, dining hall and feeding facilities.
- Separate areas or surfaces will be provided for the preparation of cooked and uncooked foods and such areas will be kept clean and orderly.
- Different color-coded cutting boards made of polypropylene or other non-absorbent synthetic material must be used for fish, meat, poultry, and vegetables.
- Preparation knives and other utensils and service items will be color coded or labelled for specific use (i.e., fish, meat, poultry, or vegetable) to prevent cross- contamination.
- All non-hard wired equipment (such as kettles, microwave ovens, etc.) will be PAT (portable appliance testing) tested.
- Kitchen and dining facilities will be inspected on a regular basis and documentation maintained by Camp Management.
- Waste vegetable oil that will be generated by the cafeterias of the camp sites will be accumulated in impermeable cans, containers or tanks resistant against corrosion both on outer and inner surfaces, separately from other wastes and will be delivered to the

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licensed recycling or disposal facilities via transporters with license according to the Regulation on Waste Vegetable Oil Control.

5.1.1.5 Standards for Nutrition and Food Safety

When cooking for a number of workers, hygiene and food safety are critical. In addition to providing safe and nutritious food is important as it has a very direct impact on workers’ productivity and well-being. An ILO study demonstrates that good nutrition at work leads to gains in productivity and worker morale, prevention of accidents and premature deaths and reductions in health care costs.

For safer food, the World Health Organization’s (WHO) five key processes or an equivalent process will be implemented.

Keep clean

Wash your hands before handling food and often during food preparation.	While most microorganisms do not cause disease, dangerous microorganisms are widely found in soil, water, animals and people. These microorganisms are carried on hands, wiping cloths and utensils, especially cutting boards and the slightest contact can transfer them to food and cause food borne diseases.
Wash your hands after going to the toilet.	
Wash and sanitise all surfaces and equipment used for food preparation.	
Protect kitchen areas and food from insects, pests and other animals.	

Separate raw and cooked

Separate raw meat, poultry and seafood from other foods.	Raw food, especially meat, poultry and seafood, and their juices, can contain dangerous microorganisms which may be transferred onto other foods during food preparation and storage.
Use separate equipment and utensils such as knives and cutting boards for handling raw foods.	
Store food in containers to avoid contact between raw and prepared foods.	

Cook thoroughly

Cook food thoroughly, especially meat, poultry, eggs and seafood.	Proper cooking kills almost all dangerous microorganisms. Studies have shown that cooking food to a temperature of 70°C can help ensure it is safe for consumption. Foods that require special attention include minced meats, rolled roasts, large joints of meat and whole poultry.
Bring foods like soups and stews to boiling to make sure that they have reached 70°C. For meat and poultry, make sure that juices are clear, not pink. Ideally, use a thermometer.	
Reheat cooked food thoroughly.	

Keep food at safe temperatures

Do not leave cooked food at room temperature for more than 2 hours.	Microorganisms can multiply very quickly if food is stored at room temperature. By holding at temperatures below 5°C or above 60°C, the growth of microorganisms is slowed down or stopped. Some dangerous microorganisms still grow below 5°C.
Refrigerate promptly all cooked and perishable food (preferably below 5°C).	
Keep cooked food piping hot (more than 60°C) prior to serving.	
Do not store food too long even in the refrigerator.	
Do not thaw frozen food at room temperature.	

Use safe water and raw materials

Use safe water or treat it to make it safe.	Raw materials, including water and ice, may be contaminated with dangerous microorganisms and chemicals. Toxic chemicals may be formed in damaged and mouldy foods. Take care in selection of raw materials and implement simple measures such as washing.
Select fresh and wholesome foods.	
Choose foods processed for safety, such as pasteurised milk.	
Wash fruits and vegetables, especially if eaten raw.	
Do not use food beyond its expiry date.	

Source: World Health Organization, Food Safety

5.1.1.6 Medical Facilities

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Maintaining workers' health and being able to respond appropriately in the event of an emergency involving their health depend on having access to sufficient medical facilities. The number of workers residing on site, the medical services that are already present in the nearby areas, and the accessibility of transportation are likely to have an impact on the availability or quality of medical facilities offered in workers' accommodations. However, first aid will be available on the Project area at all times.

First Aid Facilities: Providing adequate first aid training and facilities can save lives and prevent minor injuries becoming major ones. Related to this, first aid kits will be made available at several locations of the Project.

Other Medical Facilities: Depending on the number of workers living on site and the medical services offered in the surrounding communities, it is important to provide workers with additional medical facilities. Special facilities for sick workers and medical services such as dental care, surgery, and a dedicated emergency room can be provided.

5.1.1.7 Leisure, Social and Telecommunication Facilities

Basic resting facilities and social amenities are essential for workers to relax and socialize during their leisure time. Exercise and entertainment facilities will enhance workers' well-being and reduce their impact on the surrounding communities. Additionally, ensuring workers have adequate means to communicate with the outside world, such as free Internet access, is ensured. Evaluating cultural attitudes is crucial, and provision will be made for religious practices, taking into account local conditions and potential conflicts.

5.1.1.8 Security in Worker Accommodation Facilities/Camps

Ensuring the safety of workers and their property on the accommodation site is of paramount importance. In this regard, appropriate measures will be taken to protect workers from theft and attacks. The use of force will also be carefully evaluated (force may only be used preventively and defensively, proportional to the nature and scope of the threat). Before implementing any security arrangements, the risks to both individuals inside and outside the worker accommodation will be assessed.

5.1.1.9 Worker Rights, Rules and Regulations regarding Worker Accommodation

The human rights and freedoms of workers will be recognized and respected in accommodation areas, just as they are in the workplace. The rules and regulations of accommodation facilities will be fair and non-discriminatory. These rules and regulations will not hinder workers from exercising their fundamental rights. Any restriction on freedom of movement will be limited and properly justified.

5.1.1.10 Consultation and Grievance Mechanism

All residents will be made aware of any rules governing the accommodation and the consequences of breaking such rules. Processes that allow for consultation between site management and the resident workers will assist in the smooth running of an accommodation site. These may include a dormitory or camp committee as well as formal processes that allow workers to lodge any grievances about their accommodation.

Internal grievance mechanism covers the grievances of all employees working under the project, including contractors, subcontractors, and suppliers. It will be ensured that the worker grievance mechanism, including locked grievance boxes placed in discreet areas of the Project site, out of camera view, with grievance forms are readily available. In addition, it will be made possible for SEA/SH complaints to be reported anonymously through the existing grievance mechanism. With the internal grievance mechanism and consultation principles, workers who are subject to disciplinary action for their behaviour in workers' accommodation facilities can have access to a fair and transparent hearing with the possibility of appealing the decision.

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5.1.2 Monitoring and Reporting

Regular inspections will be conducted on a weekly basis in the scope of the Project by the Camp Supervisor and administrative unit using a checklist consistent with the IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards (2009). Their routine reviews will cover hygiene and cleanliness, facility conditions, occupancy levels, safety observations, and any immediate issues requiring prompt corrective actions. Prior to occupation of any worker accommodation facility, a pre-occupancy inspection will be conducted by the D+B Contractor and verified by the CSC to confirm compliance with the requirements of this LMP and applicable EBRD/IFC worker accommodation standards. Any deficiencies identified during the inspection will be corrected before workers are accommodated.

Additionally, internal monthly audit reports that are in compliance with the national legislation and international standards will be utilized for each regular control by OHS representatives. Non-conformities detected and recorded during field controls will also be followed up in the checklists and audit reports. Each non-conformity finding will be detailed and followed up until it is closed by proper mitigation measures and precautions. A tracking list for corrective and remedial actions that contains information on the non-conformity detected, auditor, audit date, audit location, company to which the non-conformity is related, visual record of the non-conformity, proposed corrective/remedial action, company responsible for the corrective/remedial action and its official, deadline, corrective/remedial action performed, closure date and visual record of the corrective/preventive action, action status, will be established for the project. Worker accommodation facilities will also be included within the scope of periodic labor audits conducted under the project. Audit findings, corrective actions, responsible persons, deadlines, and closure status will be documented and monitored until completion.

Monitoring data regarding accommodation standards will be kept, reviewed and reports will be prepared on a monthly basis during the construction phase of the project. These reports will include information on accommodation occupancy levels, accommodation capacity, inspection findings, accommodation-related grievances, identified non-conformities, corrective actions, and the status of implementation. Trends and recurring issues identified through inspections and grievance records will be analysed to support continuous improvement of accommodation conditions.

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6 MONITORING AND REPORTING

The D+B Contractor(s) will be required to provide monthly information on labor and OHS performance including workforce composition, working hours and wage compliance, OHS performance indicators, worker accommodation conditions, grievance statistics, and subcontractor performance. PIU will include in the contract(s) as requirement for D+B contractors to report on issues such as number of accidents rates, severity rates, number of recurring non-compliances, violations of Golden rules, fatalities and serious injuries, and penalties for non-completion. These monthly reports will also include number of workers engaged in the Project activities, trainings provided and statistics about WGM. Reports will also include findings from periodic worker accommodation inspections, including identified non-compliances, corrective actions, responsible persons, and status of closure. The level of detail to be included in these reports will be further provided in the Project Operations Manual to be prepared by PIU. D+B contractor's monthly report will be reviewed by the CSC's team. A centralised labor monitoring system will be maintained at Project level to consolidate data received from contractors and support performance tracking and reporting. The labor monitoring system will also track implementation and closure of corrective actions arising from audits, inspections, incident investigations, worker accommodation inspections, and grievance investigations.

Additionally, the D+B contractor will report to CSC about any inspections and audits carried out by the respective ministries such as the Labor Inspection. The findings of the labor audits will be presented to PIU and the Bank, if requested.

The CSC will conduct periodic supervision of contractor's OHS performance, including site visits, at least weekly. These supervisions will cover compliance with above mentioned OHS standards, ESS2, accidents, violations of golden rules, recommendations, and progress of ongoing corrective actions. The CSC will compile non-compliance reports monthly and send to PIU.

Monitoring data will be collected through the review of employment records, training records, worker interviews, grievance logs, worker accommodation inspections, site inspections, audits, subcontractor assessments, supplier evaluations, incident investigations, corrective action registers, and periodic performance reports. The PIU will periodically analyse monitoring results to identify trends, recurring issues, root causes, and opportunities for continuous improvement. Where non-compliances are identified, corrective and preventive actions will be developed, implemented, monitored, and tracked until closure.

The implementation and effectiveness of labor management measures will be monitored through the monitoring indicators presented in Table 6.1. These indicators cover workforce management, labor rights, worker welfare, working conditions, worker accommodation standards, grievance management, occupational health and safety, non-discrimination and equal opportunity, SEA/SH prevention and response, vulnerable workers, subcontractor management, supply chain management, child and forced labor prevention, and compliance monitoring activities.

Table 6.1 Monitoring indicators

Subject	Action/Outcome	Key Indicators	Means of Verification	Responsible Personnel
Workforce Profile and Recruitment	Monitor workforce composition and local employment	● % of local vs non-local workforce ● % of workers confirming receipt and understanding of employment terms	● Employment records ● Worker interviews ● HR databases	Contractor, CSC, PIU

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Subject	Action/Outcome	Key Indicators	Means of Verification	Responsible Personnel
Code of Conduct and Worker Awareness	Ensure workers understand Project requirements and rights	● % of workers receiving Code of Conduct training ● % of workers receiving induction and refresher training on labor rights and grievance mechanisms ● % of workers able to identify at least one grievance channel ● Number of awareness sessions conducted ● Number of grievances related to lack of awareness of worker rights	● Training records ● Attendance sheets ● Worker surveys ● Grievance records	Contractor, CSC
Working Conditions	Ensure compliance with labor requirements	● % of workers with compliant working hour records ● Number of overtime non-compliances identified ● Average monthly working hours per worker	● Time sheets ● Payroll records ● Labor audits	Contractor, CSC
Child and forced labor	All forms of child and forced labor being prevented in the Project	● Zero reported record of child and forced labor	● Records of the official documentation (i.e., personnel files) ● Worker contracts ● Workers' grievance records ● Random worker interviews ● Contracts with the contractors and subcontractors ● Evaluation forms	Contractor, CSC, PIU
SEA/SH Prevention	Ensure that SEA/SH risks are prevented in the Project	● % of workers trained on SEA/SH awareness ● Number of SEA/SH-related grievances (confidentially tracked) ● % of cases handled in accordance with procedures	● Face-to face interviews with woman workers ● Workers' grievance records ● Training materials ● Training records ● Worker satisfaction survey results	PIU Social Specialist, Contractor

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Subject	Action/Outcome	Key Indicators	Means of Verification	Responsible Personnel
Non-Discrimination and Equal Opportunity	Promote fair, inclusive and equal treatment of workers	• Number of discrimination-related grievances • % of discrimination-related grievances resolved within timeframe • % of workers trained on non-discrimination principles of the Project	• Training records • Grievance records • Worker interviews	Contractor, PIU
Vulnerable Workers	Ensure vulnerable workers receive appropriate support and protection	• % of workforce assessed for vulnerability categories • % of vulnerable workers receiving targeted support/training • Number of grievances raised by vulnerable workers	• Vulnerability assessments • Training records • Grievance records	Contractor, PIU
Worker Representation and Engagement	Promote worker participation and representation	• Number of worker meetings held • Number and gender distribution of worker representatives • % of workers aware of representation rights • Number of worker representation grievances/issues	• Meeting minutes • Worker surveys • Grievance records	Contractor
Monitoring, Inspection and Auditing	Monitor implementation of labor management requirements and corrective actions	• % of workers with complete and documented employment records • Number of workers receiving induction and periodic refresher trainings • Frequency of monitoring, inspection and audit activities conducted • Number of inspections conducted • Number of audits conducted • Number of monitoring reports submitted • % of corrective actions closed on time • Number of repeated non-compliances	• Monitoring reports • Audit reports • Inspection reports • Training records • Corrective action tracker	PIU, CSC, Contractor

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Subject	Action/Outcome	Key Indicators	Means of Verification	Responsible Personnel
Workers' grievance mechanism	Ensure that all workers have access to workers' grievance mechanism	- Number of grievances received (by type) % of grievances resolved within defined timeframe - Average grievance resolution time	- Grievance records per monitoring period - Random worker interviews - Training materials - Training records - Quarterly reports	PIU, Contractor
Workers' camps and accommodation conditions	All workers' camps and accommodation conditions being audited and checked regularly to ensure compliance with the international standards and resolving any non-compliances in a timely manner	% of accommodation compliant with EBRD/IFC standards - Number of inspections conducted through checklists compliant with EBRD/IFC standards % of corrective actions closed on time % of accommodation sites screened and approved	- Workers' grievance records - Random worker interviews - Audit reports and checklists - Accommodation inspection reports - Worker satisfaction survey results	Contractor, CSC, PIU
Subcontractor Management	Ensure subcontractors comply with labor management requirements	% of subcontractors screened prior to mobilisation - Number of subcontractor non-compliances identified % of corrective actions closed on time	- Training materials - Training records	Contractor, CSC
Supply chain management	Ensure that reliable suppliers are identified and selected who can provide necessary materials and services by complying the requirements of international standards and national legislation	% of primary suppliers screened - Number of supply chain labor issues identified % of corrective actions implemented for suppliers	- Supplier assessments - Supplier audits - Inspection reports - Corrective action records	Contractor, PIU
Occupational Welfare and OHS	Ensure healthy, safe and welfare-compliant working conditions	- Number of occupational welfare and OHS inspections conducted % of compliance with occupational welfare and OHS standards - Number of worker complaints related to working conditions, including OHS and occupational welfare	- OHS inspection reports - Welfare inspection reports - Grievance records	Contractor, CSC

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PIU will conduct periodic supervision including site visits, at least bi-weekly and consolidate its own monitoring results per ESS2 and EHSR requirements (including OHS and SEA/SH), the monthly non-compliance reports of CSC and D+B contractors' implementation reports and incorporate them into the Environmental and Social Monitoring Report (ESMR) to be sent to the World Bank on a six monthly basis.

Reporting on accidents and incidents

Following the provisions of Article 14, which pertains to the "Registration and Notification of Work Accidents and Occupational Diseases" as outlined in Law No 6331, employers are mandated to report occupational accidents to the SGK within three workdays of the incident. Additionally, occupational diseases, as reported by health service providers or the workplace doctor, must be communicated within three workdays from the date of discovery.

Within the context of the Project, the D+B contractor will also notify the CSC within 12 hours about any incident or accident related to the project which has or is likely to have a significant adverse effect on the environment, the affected communities, the public or workers (labor, health and safety, or security incident, accident, or circumstance, i.e. due to which the employee is unable to work for three consecutive working days, as well as SEA/SH incidents and any dangerous event that may put health and safety of the employees at risk.)⁶, but no later than 24 hours after the occurrence of the event. D+B contractor(s) will include relevant provisions in their contracts with their subcontractors so that the D+B contractor(s) can notify the CSC within 12 hours of the occurrence of the significant event happened in subcontractor's site, such as subcontractors will be contractually required to notify the D+B contractor within 6 hours of the occurrence of any significant incident.

Notifiable incidents will include, but not be limited to:

- Forced labor, trafficked labor, child labor, recruitment fee violations, retention of identity documents, or related allegations
- Worker strikes, work stoppages, or significant labor disputes
- SEA/SH incidents
- Fines, sanctions, or legal actions by labor authorities or courts
- Material non-compliance with labor laws
- Systemic or repeated worker grievances
- Disease outbreaks affecting workers or in worker accommodation facilities
- Security incidents affecting workers

Subsequently, the CSC will inform PIU within 24 hours of receiving the notification from the D+B contractor, and in any case no later than 48 hours after the occurrence of the event. and the PIU will inform the World Bank within 48 hours—but no later than three calendar days after the occurrence of the significant event.

After the notification, it is the responsibility of the D+B contractor(s) to prepare a root-cause report along with a corrective action plan (CAP), submit to the CSC within 7 calendar days of the event. CSC will review this report, if necessary, request revisions, and submit to PIU within 15 calendar days of the event. The PIU will review the report and, if necessary, request revisions, forwarding the finalized report to the World Bank within 30 calendar days of the event.

All significant incidents will be reported using the World Bank Environment and Social Incident Response Toolkit (ESIRT) template. The PIU and CSC will ensure that contractors and subcontractors receive appropriate training on incident classification, notification, and reporting requirements prior to the commencement of works.

⁶ Such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members, SEA/SH allegations or property damage.

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7 AGE OF EMPLOYMENT

Since the national legislation prohibits child labor to be engaged in hazardous works, the minimum working-age in this project will be 18 years of age.

All formal employment contracts must be registered with the SGK, which requires valid identity documentation, thereby effectively ensuring that only individuals above the legal minimum working age are employed. The age verification procedure at recruitment will be as follows:

- 1) At the time of recruitment, all applicants must present an official national ID card or passport.
- 2) Human Resources staff verify the date of birth against the legal minimum working age (18) and record this in the recruitment file.
- 3) Prior to engagement, the employment contract is registered with the SGK, which requires valid identification and automatically blocks under-18 registrations.
- 4) Subcontractors are contractually required to apply the same procedure and to keep verified ID copies in their personnel files. D+B Contractors will verify subcontractor compliance with age verification requirements through periodic inspections, labor audits, and personnel record reviews.

However, attention will be paid to labor arrangements with subcontractors and primary suppliers, where informal practices may occur. Particular attention will also be given to primary supply workers, especially where there is a risk of child labor associated with the production of materials used in the Project. To mitigate this, D+B Contractors will monitor subcontractors' compliance, include contractual obligations for formalizing employment relationships through SGK and conduct regular and random spot checks to ensure subcontractor compliance. Awareness sessions on national child labor laws and SGK will also be conducted, and the grievance mechanism will remain accessible, including for anonymous reporting, and will be available to report any concerns related to child labor. In the event that child labor is identified, appropriate remediation measures will be taken, taking into account the best interests of the child, including removal from hazardous work and referral to relevant support services, where applicable. Any confirmed use of child labor will be treated as a serious non-compliance and will result in corrective measures, suspension of works, contract penalties, or termination of the contract with the responsible contractor or subcontractor.

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8 TERMS AND CONDITIONS

Direct and contracted workers will be governed by the stipulations of Labor Law No 4857. Consequently, wages, working hours, maximum working hours, annual leaves, and all other rights and benefits outlined in Law No 4857 will be applicable. Compliance with these terms and conditions will be subject to monitoring and reporting as part of the Project's labor management system.

Employers are obliged to address the following considerations:

- Recruitment procedures will adhere to principles of transparency, publicity, equal opportunity and non-discrimination based on ethnicity, religion, sexual orientation, disability, gender, and other criteria specified in Law No 4857. No form of discrimination will be tolerated concerning any aspect of the employment relationship, encompassing recruitment, compensation, working conditions, terms of employment, access to training, promotion, or termination of employment. Equal opportunity principles will apply throughout the employment lifecycle, including recruitment, employment, training, promotion, and termination.
- A predefined application procedure will be established prior to the commencement of the recruitment process.
- Clear job descriptions, outlining the required skills for each position, will be provided in advance of recruitment.
- All project workers will receive written contracts containing job description, working hours, wages, rights and duties, CoC etc. prior to start working.
- All workers, regardless of the duration of their employment (including those hired for a month or less), will have written contracts detailing the terms and conditions of work. The contents of the contract, including the CoC, will be explained to the workers, who will sign the employment contract before commencing their duties. For individuals who may have difficulty understanding written documentation, an oral explanation of the employment conditions will be provided.
- Terms and conditions of employment will be accessible at work sites.
- Unskilled labor will be preferentially recruited from affected communities and nearby settlements. This will be added into D+B Contractor(s) bidding document.
- Employees will be notified at least one month before the termination of their employment contract.
- Contracted workers will not bear any hiring fees. If hiring fees are incurred, these will be covered by the contractors or subcontractors. Workers will not be required to pay recruitment fees, placement fees, transportation fees, visa processing fees, or any other employment-related charges as a condition of employment.
- All migrant workers will have identical working conditions and terms of employment (e.g., remuneration, overtime, working hours, weekly rest, holidays with pay, safety, health, termination of the employment relationship, and any other relevant conditions of work) as non-migrant project workers performing the same type of work.
- Contractor firms will fully adhere to national labor legislation regarding wage payments.
- Terms and conditions of direct workers, who are employed as consultants, are determined by their individual contracts, in line with the Labor Code.
- The work hours are 45 per week for contracted workers. All project workers will receive at least one rest day (24 hours) after six consecutive days of work.
- Employees working over seven and half hours a day are entitled to at least a 60-minute break, employees working less than four hours a day are entitled to 15-minute breaks, while employees working between four and seven and half hours a day are entitled to 30-minute breaks during working hours.
- Employees employed are entitled to a paid weekly uninterrupted 24-hour rest period. The weekly rest is normally on Sunday. However, an employer may determine another day for using the weekly rest, should the nature or organization of work so require.

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- The project workers shall have a right to annual, sick, and parental leave as provided in the Labor Law of Türkiye.
- All wages earned, social security benefits, unused leave time, pension contributions and any other entitlements will be paid on or before termination of employment contract. The notice periods will be compliant with Turkish Labor Law requirements.
- The employment contracts between the contractor and the worker will comply to Turkish legal requirements and shall include the job description, working hours, working conditions, wage level (including payment for overtime). In addition, workers will be provided with drugs and alcohol policy and workers Code of Conduct. A copy of the contract will be signed by both parties and a copy of the employment contract will be provided to the worker. Contractor may request employees to work overtime, not exceeding 270 hours per year, as stipulated in the Labor Law. Further, the employee's consent shall be required for overtime work, in January each year, as required by the Labor Law.
- Workers will have access to the Project's grievance mechanism (including anonymous grievance mechanism channels) to raise concerns related to their working conditions, terms of employment, or treatment in the workplace.
- All contractors and subcontractors will adopt and implement this LMP and ensure that the terms and conditions outlined herein are applied consistently to all workers. These terms and conditions will be in line, at minimum, with this LMP, Turkish Labor Law (No 4857), Occupational Health and Safety Law (No 6331) and General Conditions of the World Bank Standard procurements documents
- Workers' identification documents, including passports and personal IDs, will not be retained by D+B contractors under any circumstances, in line with national labor legislation and World Bank ESS2 .
- The D+B Contractors' Labor Management Plans (LM Plans) will set out the detailed terms and conditions applicable to contracted workers and demonstrate alignment with the requirements of this LMP, applicable national labor legislation, World Bank ESS2, , and relevant contractual obligations. The LM Plans will be subject to CSC review and approval prior to commencement of works. Compliance with these requirements will be regularly monitored through contractor reporting, site supervision, labor audits, worker interviews, grievance reviews, and other monitoring activities conducted by the CSC and PIU throughout Project implementation.

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9 WORKERS GRIEVANCE MECHANISM

AYGM, currently has a grievance mechanism in place which allows all of its employees to raise workplace concerns. Pursuant to Article 21 of Law No. 657 (Civil Servants Law), Civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible.

The complaint must be concluded within 30 days, from date of receipt of the first disciplinary supervisor authorized to decide. Civil Servants who exercise their right to complain cannot be fined for their complaints.

In line with the requirements of ESS2, the Project's Workers' Grievance Mechanism (WGM) is established by PIU for its direct workers who are not civil servants. The WGM will be accessible, confidential, and responsive, and aims to address workplace concerns related to employment terms, conditions, rights, and work environment in a timely and impartial manner. The WGM will be accessible to all Project workers, including direct workers, contractor workers, subcontractor workers, CSC personnel, PMC personnel, PIOC personnel, migrant workers, and workers residing in accommodation facilities.

It covers grievances related to:

- Conditions of employment (pay, working hours, leave, etc.)
- Occupational health and safety concerns
- Discrimination or harassment
- Disciplinary actions
- Any breach of contract or unfair treatment

This WGM will be implemented as follows:

- Submission. Complaints can be submitted verbally, in writing, or electronically (e.g., email or online form). The social expert within the PIU will be responsible for receiving complaints.
- Acknowledgment: Grievances will be acknowledged within 2 working days of receipt.
- Investigation and Resolution: All complaints will be assessed and resolved within 10 working days, depending on complexity. Workers will be kept informed of progress.
- Escalation: If the complainant is not satisfied with the outcome, the case may be escalated to a higher level within the PIU, i.e. deputy director or director of PIU. Deputy director or director of PIU will also receive grievances if the subject of the complaint is the social expert of PIU. Workers who are not satisfied with the outcome of their grievance may submit an appeal through the Project's grievance appeal process in accordance with the procedures established under the Project SEP.
- Confidentiality and Non-Retaliation: The identity of complainants will be protected, and no worker will face retaliation for raising concerns in good faith. The grievance mechanism will also allow for the submission of anonymous complaints.

All grievances will be recorded in a secure grievance log including date of submission, issue raised, resolution status, and closing date. All grievances will also be recorded and tracked through a centralised Project-level Worker Grievance Database maintained by the PIU. A sample Worker Grievance Log is provided in Annex-3 to support the consistent recording, tracking, and closure of worker grievances throughout Project implementation. The database will consolidate grievance information received from direct workers, contractor workers, subcontractor workers, CSC personnel, PMC personnel and PIOC personnel.

PIU will periodically review grievance trends, recurring issues, root causes, response times, and effectiveness of corrective actions to support continuous improvement of labor management performance. Posters, brochures, grievance forms, and grievance process flowcharts outlining

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the grievance procedure and contact details will be displayed at PIU offices, contractor offices, worker accommodation facilities, and other worker-accessible locations. These materials will be made available in Turkish and, where required based on workforce composition, in other languages spoken by Project workers to ensure the accessibility and effective use of the Worker Grievance Mechanism.

The Worker Grievance Mechanism follows the process illustrated in Figure 9.1. The mechanism is designed to ensure that all grievances submitted by Project workers are registered, acknowledged, assessed, investigated, resolved, and closed in a timely, transparent, and confidential manner. The process applies to all Project workers, including direct workers, contractor workers, subcontractor workers, CSC personnel, PMC personnel, and PIOC personnel.

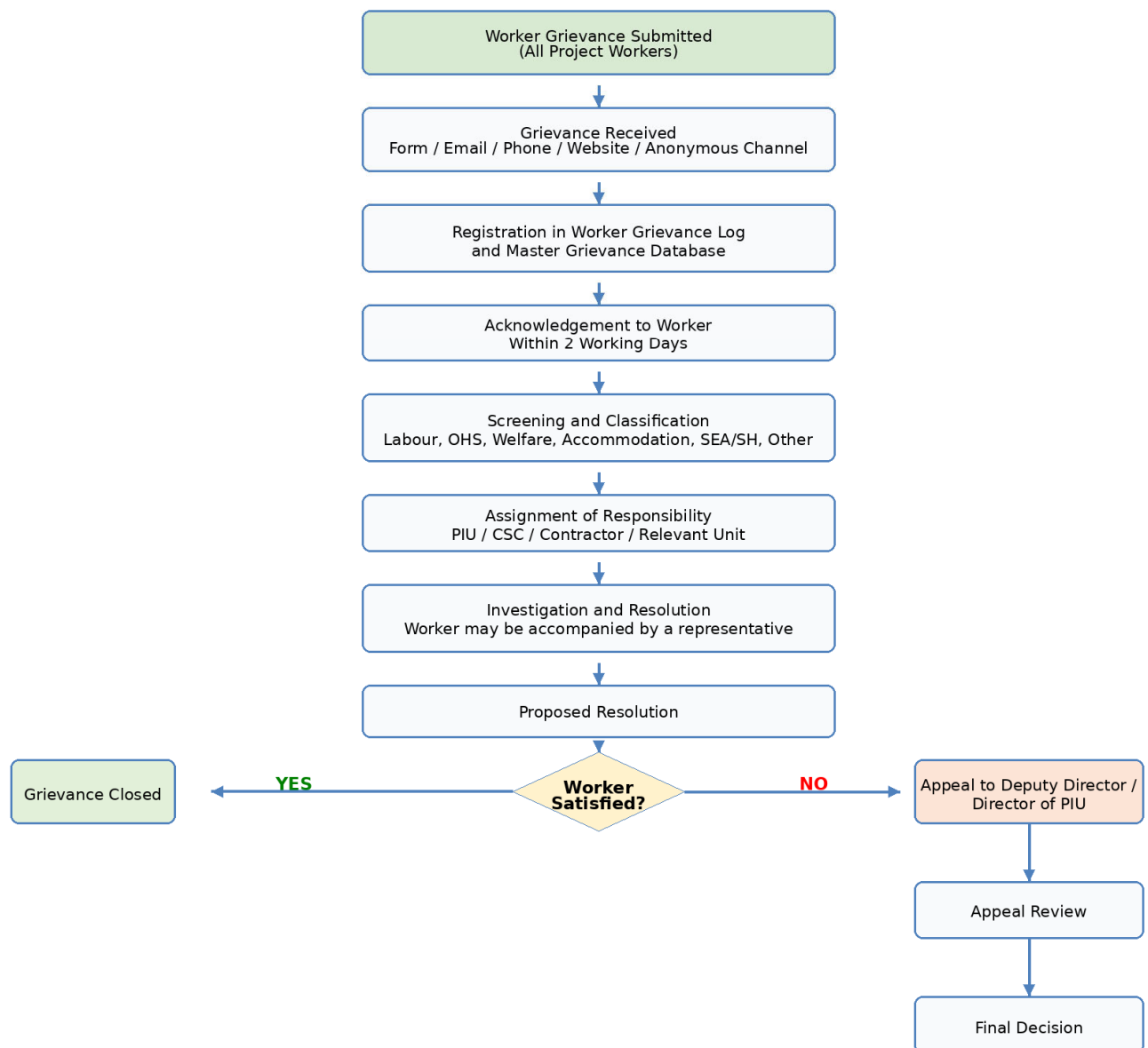


Figure 9.1 Grievance mechanism procedure

WGM is based on the following principles:

- Workers will be informed about WGM at the time of their recruitment, and their employment contracts will involve detailed information of WGM including the ways they

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can convey their grievances and how these grievances will be recorded, handled, and monitored.

- The process will be transparent and allow workers to express their concerns and file grievances at any time.
- All grievances will be treated in a fair and respectful manner.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.
- WGM will not prevent workers to use any other judicial mechanisms provided by the national laws.

PIU will require D+B Contractor(s) and CSC to develop and implement a WGM for their workers, prior to the start of works in line with the PIU's WGM described above to ensure that all contracted workers have access to a fair, transparent, and prompt mechanism to express concerns or grievances, and to resolve complaints at the earliest possible stage to promote a harmonious working environment and safeguard labor rights. If the D+B contractors and CSC have an already established WGM, they can utilize that WGM provided that it is in line with the principles and procedures described in this section and records regarding the Project are kept separately.

The WGM of D+B Contractor(s) will be a part of their LM Plan.

In line with the WGM described above, D+B Contractor(s) and CSC WGM will include, at minimum:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes (ensure that suggestion boxes at workplaces will be opened on a weekly basis), email address, a telephone hotline, focal point department.
- stipulated timeframes to respond to grievances and to address cases.
- a register to record and track the timely resolution of grievances.
- a responsible department to receive, record, address, and track resolution of grievances.

The requirements for D+B Contractor(s) to establish WGM before the mobilization phase and to operate and maintain throughout the subproject activities will be incorporated in the bid documents. D+B Contractor(s) require their subcontractors to establish their own WGM and incorporate into D+B Contractor(s)' WGM.

The CSC will monitor the contractors' recording and resolution of grievances, and report these to PIU in their monthly progress reports. Periodic labor reports will include grievance statistics, categories of grievances, average response and resolution times, number of open and closed grievances, appeals, and recurring issues identified through grievance analysis. The process will be monitored by the social expert of PIU. The Social Specialist of the PIU will maintain a centralised Project-level Worker Grievance Database (Master Grievance Log) containing grievances received from direct workers, contractors, subcontractors, CSC personnel, PMC personnel and PIOC personnel. The database will include grievance category, date received, response time, actions taken, appeals, closure status, and lessons learned. Grievance data will be periodically analysed to identify trends, recurring issues, and opportunities for improvement.

9.1 Sexual Exploitation and Abuse / Sexual Harassment

In accordance with ESS2, ESS10, the Project WGM includes a dedicated and confidential mechanism to receive, manage, and resolve complaints related to SEA/SH. This mechanism is aligned with survivor-centered principles and accessible to all project workers (excluding civil servants), and is consistent with the arrangements set out in the SEA/SH Action Plan and the Accountability Response Framework.

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All workers will be informed about their rights and the grievance channels during induction training, including specific procedures for SEA/SH cases as outlined in the Code of Conduct (Annex-2).

Workers may report SEA/SH grievances through social expert, deputy director or director of PIU (especially in case the social expert is the alleged perpetrator), and a web site form which allows anonymity, including options to direct the grievance (social expert, deputy director or director of PIU). SEA/SH grievances may be submitted anonymously. Anonymous complaints will be assessed and managed with the same level of seriousness, confidentiality, and survivor-centred approach as non-anonymous complaints.

SEA/SH-related complaints will be managed based on the following survivor-centric principles:

- Confidentiality will be strictly upheld; details will only be shared on a need-to-know basis.
- Non-retaliation will be guaranteed; workers who file SEA/SH grievances will be protected from any form of reprisal.
- Informed consent will be obtained before any referral or further action is taken.
- Respect and dignity will be maintained throughout the process.

Once a SEA/SH grievance is received:

- The social expert (or deputy director or director) will inform WB's social expert who is responsible from INRAIL within 24 hours.
- If urgent support is needed, the survivor will be immediately referred to the Ministry of Family and Social Services call center (ALO 183). Additional referrals to qualified medical, psychosocial, legal, and protection service providers will be made in accordance with the referral pathways defined in the Project SEA/SH Action Plan, subject to the survivor's informed consent.
- The survivor will be informed of available options and decide whether to proceed with a formal investigation or resolution.
- An investigation plan will be prepared under the guidance of WB's social expert.
- Non-identifiable information on SEA/SH cases will be included in the Project's central grievance monitoring system for reporting and trend analysis purposes, while ensuring survivor confidentiality.

To ensure effective implementation

- All PIU, CSC and contractor staff with grievance responsibilities will be informed that they should notify the social expert, deputy director or director of PIU as soon as they received any SEA/SH grievance without further investigation and maintaining full confidentiality (without informing anyone)
- SEA/SH training will be provided to all workers under induction training underlining the examples of cases and the existing of SEA/SH grievance mechanism and channels to communicate SEA/SH grievances.
- Refresher training will be held annually, and tailored sessions will be provided for newly hired staff.
- SEA/SH grievance records will be maintained separately from other grievance records with restricted access and in accordance with confidentiality and data protection requirements.

Roles and responsibilities of the actors in the SEA/SH is described in below:

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- **AYGM PIU Social Specialist:** Oversees the entire SEA/SH GM implementation, ensures compliance with World Bank standards and coordinates with INRAIL PIU.
- **PMC Gender Specialist:** Holds primary responsibility for managing SEA/SH grievances. Receives, logs, and sorts allegations; refers survivors to service providers; notifies AYGM/World Bank; and prepares monitoring reports on SEA/SH grievance cases.
- **PMC Social Specialist:** Supports the Gender Specialist in recording grievances and ensuring data is properly documented and reported to the Gender Specialist.
- **Supervision Consultant Social Specialist:** Monitors on-site implementation of SEA/SH measures, ensures contractor compliance with the CoC, and refer cases to the Gender Specialist.
- **Contractor Social Specialist:** Informs workers about grievance procedures, records site-level complaints and immediately refers them to the Gender Specialist
- **Contractor Community Liaison Officer (CLO):** Acts as the first point of contact for the community, facilitates confidential grievance submissions, and ensures confidentiality during referral to the Gender Specialist.
- **SEA/SH Ethics Committee:** Determines if an allegation meets WB definitions and involves a project-associated perpetrator. Findings require WB concurrence before referring the case, with survivor consent, to the employer or legal authorities.
- External experts or institutions must be involved immediately for any cases involving children.
- The Gender Specialist and Ethics Committee act as "Case Managers," tracking every step in a secure, restricted-access database until final resolution.
- If the complaint is related to the Project, the AYGM PIU will ensure that the survivor receives all required services. If the complaint is not related to the project, the PIU's responsibility will end only at referral to relevant services.

Channels for Submitting Complaints

- Confidential intake channels will operate at all levels to ensure survivor comfort. Personnel at the PIU, consultant, and contractor levels will only record basic information and immediately and confidentially relay it to the INRAIL PMC Gender Specialist for management. The gender specialist will proceed with the management of the case with the support of the SEA/SH Ethics Committee to enable the necessary guidance and assessments for the investigation process.
- Gender Specialist sorts and processes the allegation. When the allegation is received in person, the INRAIL PMC Gender Specialist records the survivor's account of the incident. The design of the grievance channels will take into account the needs of vulnerable groups. All received grievances will be recorded in a grievance register table which is given in Annex 1.
- SEA/SH grievances can be submitted through multiple channels which are described below:

Table 10.1 Channels for Submitting Complaints

Channel	Contact information/ person
Phone line of the Ministry of Transport and Infrastructure (MoTI)	0312 203 10 00
Hotline of the MoTI	Alo 123
WhatsApp line	-
E-mail	hazal.babur@uab.gov.tr
In-person	AYGM PIU Social Specialist
	PMC Gender Specialist

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	PMC Social Specialist	
	Supervision consultants' Social Specialists	
	Contractors' Social Specialists	
	Contractors' CLO(s)	
Complaint boxes located at construction sites and neighborhood community point	PMC Gender Specialist	
Complaint form submitted via project website	Contractor CLO(s)	
World Bank Grievance Redress Service (GRS)	http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service .	

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10 CONTRACTOR MANAGEMENT

AYGM will use the World Bank's 2021 Standard Procurement Document (SPD) for solicitations and contracts, incorporating labor and OHS requirements.

As part of the process to select design and build contractors who will engage contracted workers, the PIU and/or the supervision consultant may review the following information:

- Information in public records, for example corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies,
- Business licenses, registrations, permits, and approvals,
- Documents relating to a labor management system, including OHS issues, for example LM Plans,
- Identification of labor management, safety, and health personnel, their qualifications and certifications,
- Workers' certifications/permits/training to perform required work,
- Records of safety and health violations, and responses,
- Accident and fatality records, along with notifications to authorities,
- Records of legally required worker benefits and proof of workers' enrollment in related programs (i.e., training records, vocational certificates, risk assessments),
- Worker payroll records, including hours worked and pay received,
- Records demonstrating compliance with requirements related to prohibition of recruitment fees and retention of workers' identity documents,
- Identification of safety committee members and records of meetings,
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

The contracts with selected contractors will include provisions related to labor and OHS, as provided in the World Bank SPD and Turkish law. The contracts will also require D+B Contractor(s) and subcontractors to comply with the requirements of this LMP, applicable World Bank ESS2 requirements, including provisions related to non-discrimination and equal opportunity, prevention of child labor and forced labor, worker grievance mechanisms, worker accommodation standards, SEA/SH prevention and response measures, freedom of association, and occupational welfare requirements. Contractors will be required to prepare and implement Contractor LM Plans consistent with this LMP and to ensure that equivalent requirements are cascaded to all subcontractors.

The CSC will manage and monitor the performance of D+B Contractor(s) in relation to contracted workers, focusing on compliance by D+B contractors with their contractual agreements (obligations, representations, and warranties). The D+B Contractor(s) will also be responsible for monitoring and managing the performance of subcontractors and ensuring that all subcontractors comply with the requirements of this LMP, applicable national legislation, ESS2 requirements. This may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or labor management records and reports compiled by D+B Contractor(s). Monitoring activities may also include confidential worker interviews to verify compliance with labor requirements and identify potential labor risks or concerns. Periodic labor audits will be undertaken to verify compliance with labor management requirements, including working conditions, wage payments, working hours, grievance management, worker accommodation standards, recruitment practices, and OHS requirements.

D+B Contractor's labor management records and reports may include:

- A representative sample of employment contracts or arrangements between third parties and contracted workers,
- Records related to grievances received and their resolution,
- Reports relating to safety inspections, including fatalities and incidents, and implementation of corrective actions,

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- Records of worker accommodation inspections, identified non-conformities, corrective actions, and closure status,
- Records relating to incidents of non-compliance with national law, and
- Records of training provided for contracted workers to explain labor and working conditions and OHS for the project.

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11 PRIMARY SUPPLY WORKERS

The primary suppliers shall be companies that manufacture goods and materials essential for the construction and operation of the Project, including but not limited to structural steel, prefabricated concrete elements, rail tracks, signaling systems, electrical cabling, and other critical infrastructure components. These sectors, particularly construction materials and electrical systems supply chains, may present certain occupational safety risks due to the nature of industrial production and handling. Although child labor and forced labor are not widespread or systemic issues in Türkiye’s formal industrial supply chains due to stringent labor regulations and mandatory social security registration, potential risks may still arise, especially among small-scale subcontractors or informal labor arrangements. Therefore, contractors will be required to carry out a due diligence procedure when engaging local suppliers, to ensure that no child labor, forced labor, or serious safety risks are present in their operations. Primary suppliers will be informed of the Project’s requirements regarding prohibition of child labor, forced labor, recruitment fees, and retention of identity documents. Where significant labor risks are identified, the D+B Contractor(s) will conduct periodic monitoring of the supplier’s labor management performance and implementation of corrective measures.

In instances where international suppliers are contracted—particularly for specialized railway technology or electrical systems—contractors will be required to assess during procurement whether such suppliers have been previously accused or sanctioned for child or forced labor, or for labor-related safety violations. This process will also include a review of the supplier’s corporate policies and compliance standards related to labor rights and safety. The selection of primary suppliers will take into account their compliance with national labor legislation, occupational health and safety requirements, and internationally recognized labor standards. If any risks related to child labor, forced labor, or critical OHS issues are identified during due diligence or supplier monitoring activities, the PIU and D+B Contractor(s) will implement appropriate corrective and mitigation measures including contract clauses, monitoring protocols, and supplier disqualification processes, as necessary.

Annex-1 Location of the Project



İstanbul Kuzey Demiryolu Geçişi Projesi (Istanbul North Rail Crossing Project)



**Directorate General
of Infrastructure Investments**

**TOPOĞRAFİK
HARİTA
(TOPOGRAPHIC
MAP)**



**ÇINAR ENGINEERING
CONSULTANCY INC.**

LEJANT / LEGEND

- Deniz / Sea
 INRAIL Proje Güzergahı / INRAIL Project Alignment
 Çevresel Etki Alanı / Environmental Area of Influence (1 km)

Source: []

Source D10										
HGR	1/25,000 Scale	F2001 D+HGR	1/25,000 Scale	F2161 D+HGR	1/25,000 Scale	F2201 D+HGR	1/25,000 Scale	G2294	1/25,000 Scale	G2294
HGR	1/25,000 Scale	F2002 D+HGR	1/25,000 Scale	F2162 D+HGR	1/25,000 Scale	F2202 D+HGR	1/25,000 Scale	G2295	1/25,000 Scale	G2295
HGR	1/25,000 Scale	F2003 D+HGR	1/25,000 Scale	F2163 D+HGR	1/25,000 Scale	F2203 D+HGR	1/25,000 Scale	G2296	1/25,000 Scale	G2296
HGR	1/25,000 Scale	F2004 D+HGR	1/25,000 Scale	F2164 D+HGR	1/25,000 Scale	F2204 D+HGR	1/25,000 Scale	G2297	1/25,000 Scale	G2297
HGR	1/25,000 Scale	F2005 D+HGR	1/25,000 Scale	F2165 D+HGR	1/25,000 Scale	F2205 D+HGR	1/25,000 Scale	G2298	1/25,000 Scale	G2298
HGR	1/25,000 Scale	F2006 D+HGR	1/25,000 Scale	F2166 D+HGR	1/25,000 Scale	F2206 D+HGR	1/25,000 Scale	G2299	1/25,000 Scale	G2299
HGR	1/25,000 Scale	F2007 D+HGR	1/25,000 Scale	F2167 D+HGR	1/25,000 Scale	F2207 D+HGR	1/25,000 Scale	G2300	1/25,000 Scale	G2300
HGR	1/25,000 Scale	F2008 D+HGR	1/25,000 Scale	F2168 D+HGR	1/25,000 Scale	F2208 D+HGR	1/25,000 Scale	G2301	1/25,000 Scale	G2301
HGR	1/25,000 Scale	F2009 D+HGR	1/25,000 Scale	F2169 D+HGR	1/25,000 Scale	F2209 D+HGR	1/25,000 Scale	G2302	1/25,000 Scale	G2302
HGR	1/25,000 Scale	F2010 D+HGR	1/25,000 Scale	F2170 D+HGR	1/25,000 Scale	F2210 D+HGR	1/25,000 Scale	G2303	1/25,000 Scale	G2303
HGR	1/25,000 Scale	F2011 D+HGR	1/25,000 Scale	F2171 D+HGR	1/25,000 Scale	F2211 D+HGR	1/25,000 Scale	G2304	1/25,000 Scale	G2304
HGR	1/25,000 Scale	F2012 D+HGR	1/25,000 Scale	F2172 D+HGR	1/25,000 Scale	F2212 D+HGR	1/25,000 Scale	G2305	1/25,000 Scale	G2305
HGR	1/25,000 Scale	F2013 D+HGR	1/25,000 Scale	F2173 D+HGR	1/25,000 Scale	F2213 D+HGR	1/25,000 Scale	G2306	1/25,000 Scale	G2306
HGR	1/25,000 Scale	F2014 D+HGR	1/25,000 Scale	F2174 D+HGR	1/25,000 Scale	F2214 D+HGR	1/25,000 Scale	G2307	1/25,000 Scale	G2307
HGR	1/25,000 Scale	F2015 D+HGR	1/25,000 Scale	F2175 D+HGR	1/25,000 Scale	F2215 D+HGR	1/25,000 Scale	G2308	1/25,000 Scale	G2308
HGR	1/25,000 Scale	F2016 D+HGR	1/25,000 Scale	F2176 D+HGR	1/25,000 Scale	F2216 D+HGR	1/25,000 Scale	G2309	1/25,000 Scale	G2309
HGR	1/25,000 Scale	F2017 D+HGR	1/25,000 Scale	F2177 D+HGR	1/25,000 Scale	F2217 D+HGR	1/25,000 Scale	G2310	1/25,000 Scale	G2310
HGR	1/25,000 Scale	F2018 D+HGR	1/25,000 Scale	F2178 D+HGR	1/25,000 Scale	F2218 D+HGR	1/25,000 Scale	G2311	1/25,000 Scale	G2311
HGR	1/25,000 Scale	F2019 D+HGR	1/25,000 Scale	F2179 D+HGR	1/25,000 Scale	F2219 D+HGR	1/25,000 Scale	G2312	1/25,000 Scale	G2312
HGR	1/25,000 Scale	F2020 D+HGR	1/25,000 Scale	F2180 D+HGR	1/25,000 Scale	F2220 D+HGR	1/25,000 Scale	G2313	1/25,000 Scale	G2313
HGR	1/25,000 Scale	F2021 D+HGR	1/25,000 Scale	F2181 D+HGR	1/25,000 Scale	F2221 D+HGR	1/25,000 Scale	G2314	1/25,000 Scale	G2314
HGR	1/25,000 Scale	F2022 D+HGR	1/25,000 Scale	F2182 D+HGR	1/25,000 Scale	F2222 D+HGR	1/25,000 Scale	G2315	1/25,000 Scale	G2315
HGR	1/25,000 Scale	F2023 D+HGR	1/25,000 Scale	F2183 D+HGR	1/25,000 Scale	F2223 D+HGR	1/25,000 Scale	G2316	1/25,000 Scale	G2316
HGR	1/25,000 Scale	F2024 D+HGR	1/25,000 Scale	F2184 D+HGR	1/25,000 Scale	F2224 D+HGR	1/25,000 Scale	G2317	1/25,000 Scale	G2317
HGR	1/25,000 Scale	F2025 D+HGR	1/25,000 Scale	F2185 D+HGR	1/25,000 Scale	F2225 D+HGR	1/25,000 Scale	G2318	1/25,000 Scale	G2318
HGR	1/25,000 Scale	F2026 D+HGR	1/25,000 Scale	F2186 D+HGR	1/25,000 Scale	F2226 D+HGR	1/25,000 Scale	G2319	1/25,000 Scale	G2319
HGR	1/25,000 Scale	F2027 D+HGR	1/25,000 Scale	F2187 D+HGR	1/25,000 Scale	F2227 D+HGR	1/25,000 Scale	G2320	1/25,000 Scale	

Kaynaklar:

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ÇINAR CBS BÖLÜMÜ
Lisanslı  **Arc** Kullanıcısıdır.



Revizyon Revision	Çizen Drawn by	Kontrol Checked by	Tarih Date	Ölçek Scale	Projeksiyon Projection	Datum
01	FURKAN ÖZBAŞ	Serkan MURATLI	4.06.2025	1:125,000	UTM Zon 35	ED50

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Annex-2 Code of Conduct

CODE OF CONDUCT PROJECT WORKERS⁷

We are the Contractor, *[enter name of Contractor]*. We have signed a contract with *[enter name of Employer]* for *[enter description of the Works]*. These Works will be carried out at *[enter the Site and other locations where the Works will be carried out]*. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “Contractor’s Personnel” and are subject to this Code of Conduct. In addition, all personnel are individually required to sign their own Code of Conduct, drafted as per the template provided in Annex 8 in SEA/SH Management Plan.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel.

Our workplace is an environment where unsafe, offensive, abusive, or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

Required Conduct

Contractor’s Personnel shall:

- 1) carry out his/her duties competently and diligently,
- 2) comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Contractor’s Personnel and any other person,
- 3) maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment, and processes under each person’s control are safe and without risk to health,
 - b. wearing required personal protective equipment,
 - c. using appropriate measures relating to chemical, physical and biological substances, and agents, and
 - d. following applicable emergency operating procedures,
- 4) report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health,
- 5) treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children,
- 6) not engage in Sexual Harassment which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel,

⁷ This Code of Conduct (CoC) is adopted from the World Bank Standard Procurement Document, Request for Bids Small Works, March 2017. This CoC will be included by the bidder to the bidding documents and the awarded Construction Contractor will use the version she or he presented in the bidding document and will include this CoC to contracts with its subcontractors.

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- 7) not engage in Sexual Exploitation which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- 8) not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- 9) not engage in sexual favors (e.g. making promises of favorable treatment such as promotions, threats of unfavorable treatment such as losing a job, payments in kind or in cash dependent on sexual acts) and any form of humiliating, degrading or exploitative behavior
- 10) not engage in the use of prostitution in any form at any time.
- 11) not engage in any form of sexual contact or sexual activity with individuals under the age of 18, (except in case of pre-existing marriage) including through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excus
- 12) not engage in demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior. These are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
- 13) not engage in any forms of GBV, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.
- 14) not engage in sexual interactions with any employees from the company (at any level) and members of the communities surrounding the work-place, unless there is full consent⁸ by all parties involved in the sexual act. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.
- 15) complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH),
- 16) report violations of this Code of Conduct, and
- 17) not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Mechanism.

Raising Concerns

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV/SEA/SH by a fellow worker, whether in the same company or not. This can be done in either of the following ways:

- 1) Contractor level:

⁸ **Consent:** refers to when an adult makes an informed choice to agree freely and voluntarily to do something. There is **no** consent when agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation; the use of a threat to withhold a benefit to which the person is already entitled, or; a promise made to the person to provide a benefit. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

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- a) Contact *[enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters]* in writing or in person at this address *[enter the address]* or by telephone at *[enter the phone number]* or by e-mail at *[enter e-mail]*; or
 - b) Drop grievance form/letter to suggestion/complaint boxes at the Work Sites; or
 - c) *[delete if there is not any hotline]* Call *[enter hotline]* to reach the Contractor's hotline and leave a message.
- 2) AYGM PIU Level:
- Contact *[enter name of the AYGM PIU's Social Specialist]* in writing or in person at *[enter the address]* or by telephone at *[enter the phone number]* or by e-mail at *[enter e-mail]*
- 3) *Project Management Consultant's PMC* level:
- a) Contact *[enter name of the Project Management Consultant's Gender Specialist]* in writing or in person at this address *[enter the address]* or by telephone at *[enter the phone number]* or by e-mail at *[enter e-mail]*; or
- 4) National level
- a) For issues regarding Sexual Exploitation, Assault / Sexual Harassment: Call 183 or send a WhatsApp message to +90 501 183 0183 to reach the Ministry of Family and Social Service.
 - b) For issues regarding terms and conditions and occupational health and safety: Call 170 or send a WhatsApp message to +90 850 222 7170 to reach the Ministry of Labor and Social Security.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

Consequences of Violating the Code of Conduct

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination of employment and, in addition to company sanctions, referring the case to and possible referral to legal authorities for pursuing legal prosecution against those who commit acts of GBV/SEA/SH, when appropriate.

Implementation

To ensure that the above principles are implemented effectively the contractor commits to:

1. Ensuring that all employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in SEA, SH, GBV, or child endangerment.
2. Displaying the Contractor and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
3. Ensuring that posted and distributed copies of the Contractor and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.

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4. Ensuring that an appropriate person is nominated as the company's 'Focal Point' for addressing SEA/SH/GBV issues.
5. Ensuring that the company effectively implements the agreed final SEA/SH Action Plan, providing feedback to the AYGM PIU for improvements and updates as appropriate.
6. Ensuring that all employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to the Code of Conduct that is related to the ESHS and OHS standards, and the project's SEA/SH Action Plan.
7. Ensuring that all employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and Code of Conduct.

For Contractor's Personnel

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact *[enter name of Contractor's contact person with relevant experience in handling gender-based violence]* requesting an explanation.

Name of Contractor's Personnel: *[insert name]*

Signature : _____

Date : *[day/month/year]*_____

Countersignature of authorized representative of the Contractor

Signature : _____

Date : *[day/month/year]*_____

ATTACHMENT 1: Behaviors constituting Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

Eligible complaints include misconduct by staff or beneficiaries, SEA/SH, discrimination, coercion, abuse of authority, intimidation, sexually provocative language and behavior and the misuse of authority for sexual favors.

The following non-exhaustive list is intended to illustrate types of prohibited behaviors:

- 1) Examples of sexual exploitation and abuse include, but are not limited to:
 - A Contractor's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.

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- A Contractor's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Contractor's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Contractor's Personnel denies a person access to the Site unless he/she performs a sexual favor.
- A Contractor's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

2) Examples of sexual harassment in a work context

- Contractor's Personnel comment on the appearance of another Contractor's Personnel (either positive or negative) and sexual desirability.
- When a Contractor's Personnel complains about comments made by another Contractor's Personnel on his/her appearance, the other Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Contractor's or Employer's Personnel by another Contractor's Personnel.
- A Contractor's Personnel tells another Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

KEY DEFINITIONS

- The definitions of all relevant terms can be found in the World Bank Good Practice Notes: 'Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations', 'Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works' and IASC Guidelines for Integrating Gender-Based Violence Interventions in Humanitarian Action.
- **Child:** refers to a person under the age of 18, and allegations of SEA/SH by or on behalf of a child shall be treated with additional safeguards to protect the child.
- **Child Sexual Abuse:** Any form of sexual relations with a child, bearing in mind that a child cannot give consent. The World Bank considers children as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.
- **Complainant:** A person who brings an allegation of SEA to the GM in accordance with established procedures, whether a SEA/SH survivor or another person who is aware of the wrongdoing.
- **Confidentiality:** An ethical principle that service providers should protect information gathered about clients and only share information about cases with their explicit permission (IASC 2015: 324).
- **Consent:** Refers to approval or assent given voluntarily and freely, after thoughtful consideration. To give consent, individuals must have access to all relevant facts at the time they give their consent, and they must be able to evaluate and understand the consequences of any action. They must be aware of and have the power to exercise their right to refuse to engage in an action, and they must not feel coerced by financial considerations, force, or threats (IASC 2015: 324). In cases of sexual exploitation and abuse (SEA) and sexual harassment (SH), obtaining consent means obtaining the permission of survivors before sharing information about them with others, such as referral services.

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- **GBV Service Provider:** An organization offering specific services for GBV survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services etc.
- **Gender-based violence (GBV):** Gender-based violence, or GBV, is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Across the globe, gender-based violence disproportionately affects women and girls (World Bank 2020).
- **Individual associated with an internationally financed project:** Such individuals would include any worker hired with international financing, consultants supervising the operation, consultants undertaking technical assistance activities or studies relating to the operation, security personnel hired to protect the project site, PIU staff (whether financed by the Bank or not), contractors or consultants on the project whose contracts are financed by a co-financier, IFI staff, or anyone to whom the project GBV requirements apply.
- **Potential Perpetrators:** For the purpose of this note, potential perpetrators of SEA/SH can be any personnel associated with the project and may include not only construction workers, but also consultants and project staff supervising the civil works or undertaking technical assistance activities or studies, or the security guards hired to protect a project site (World Bank 2020: 8).
- **Sexual exploitation:** Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In internationally financed operations, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, nonconsulting services or consulting services is used to extract sexual gain.
- **Sexual abuse:** actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment (SH):** Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment (IASC 2016b).
- **Survivor:** A survivor is a person who has experienced SEA/SH incident or another form of gender-based violence. In the psychological and social support sectors, the term "survivor" is generally preferred to the term "victim" because the former implies resiliency (IASC 2015: 326).

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Annex-3 Sample Grievance Log

Registration number	Date of receipt and registration	How is the grievance received? (via Grievance Form, community meeting, telephone etc.)	Name of the responsible staff receiving grievance	Information about the applicant (Leave blank if application is anonymous)				Grievance category	Description of the grievance	Priority of the grievance (High, Medium, Low)	Due date of the addressing the grievance	Responsible person/ department for follow-up	Grievance status (open, closed, pending)	Action planned	Date of action taken	Supporting documents for grievance closeout and resolution
				Name and surname	Gender	Telephone and/or e-mail	District									

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