



AYGM

HALKALI - ISPARTAKULE - CERKEZKOY RAILWAY LINE

Contractor Management Plan





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1 INTRODUCTION

1.1 THE PROJECT

- 1.1.1. The Altyapı Yatırımları Genel Müdürlüğü (AYGM), translated as the General Directorate of the Infrastructural Investment, intends to construct a new Halkali-Ispartakule-Cerkezkoy high speed railway line (herein referred to as ‘the Project’), which will be located within the region of Istanbul and province of Tekirdag. Once operational the Project would be maintained and operated by TCDD & TCDD Taşımacılık (TCDD Transport).
- 1.1.2. The Project will provide passenger and freight services connecting Istanbul (at the existing Halkali Station) to the district of Cerkezkoy and will link to the under-construction Cerkezkoy-Kapikule railway. The Project, together with the in construction Cerkezkoy-Kapikule railway, will be part of the Trans-European Transport Network (TEN-T) connecting to Turkey’s European border (at Kapikule). The Project and the Cerkezkoy-Kapikule railway will together form one integrated railway system with full interoperability.
- 1.1.3. The European Bank for Reconstruction and Development (**EBRD**) and the Asian Infrastructure Investment Bank (**AIIB**), collectively called the ‘Lenders’, are considering financing sections of the Project. The Project has therefore been developed in accordance with the Lenders policy and requirements.
- 1.1.4. The requirement for a Contractor Management Plan (**CMP**) has been identified as part of the Project.

1.2 DOCUMENT PURPOSE AND SCOPE

- 1.2.1. This **CMP** has been produced to set out the environmental and social management requirements applicable to all contractors, including sub-contractors, during the Project’s lifetime. The purpose of the **CMP** is to:
- Outline the applicable Project Requirements, Legislation and Standards;
 - Identify roles and responsibilities for AYGM and the Contractor(s);
 - Provide processes and criteria for Contractor(s) selection;
 - Set out the processes, procedures and systems to be used for Contractor(s) engagement and management;
 - Define monitoring and reporting procedures, including requirements for the Contractor(s);
 - Set out the expectations for the Contractor’s environmental, social and health and safety management procedures and training; and
 - Set out the Contractors responsibilities in relation to the Grievance Mechanism for construction workers.
- 1.2.2. This **CMP** is intended to be read as a live document, any changes occurring in the Contractor engagement process and during the construction phase may result in changes to this document.

1.3 RELATIONSHIP TO THE CESMP

- 1.3.1. The Contractor is required to add further details to the Environmental and Social Management Plan (**ESMP**) that has been prepared for the Project, to prepare the Construction Environmental and Social Management Plan (**CESMP**) and associated supporting documentation and implement this

during construction. The **CESMP** will set out the specific measures that will be adhered to during the construction of the Project, in line with the Lender's Requirements as well as EU and national legislation. The **CESMP** will include the following sub plans, as required in the **ESMP**:

- Construction Biodiversity Management Plan (based on the Biodiversity Management Plan)
- Construction Emergency Response Plan (based on the Emergency Response Framework)
- Design Change and Management Procedure;
- Supply Chain Management Plan;
- Air Quality and Dust Management Plan;
- Construction Traffic Management Plan;
- Construction Travel Plan;
- Construction Compound Selection and Management Plan;
- Construction Worker's Accommodation Management Plan;
- Cultural Heritage Management Plan;
- Landscape Management Plan (and Landscape / Planting Plans);
- Noise and Vibration Management Plan;
- Waste Management Plan and Materials Management Plan;
- Health, Safety and Security Plan;
- Surface Water Management Plan;
- Spoil Management Plan;
- Tunnel Construction Plan;
- Tunnel Handover Plan;
- Blasting Management Plan;
- Construction and Design Risk Register;
- Employment Plan;
- Labour Management and Monitoring Plan;
- Risk Assessments and Method Statements;
- Training Plan; and
- Workforce Demobilisation Plan

1.3.2. The Contractor will be required to align their own environmental, health, safety and social management systems with those of AYGM and the Project.

1.4 OTHER RELATED DOCUMENTS

1.4.1. The following documents have also been prepared for the Project and have measures that the Contractor will be required to implement:

- Stakeholder Engagement Plan (SEP);
- Resettlement Action Plan (RAP);
- Biodiversity Management Plan (BMP);
- Emergency Response Framework (ERF); and

1.4.2. A Railway Safety Plan has been produced by AYGM that mandates all the activities the Contractor will need to undertake in order to manage safety according to the European Common Safety Method for Risk Assessment (CSM-RA). A description of the Railway Safety Strategy for the Project, and the framework for a safety management system, is set out in Chapter 6 of the Railway Safety Plan. The Contractor in turn will need to comply with the Railway Safety Plan and produce further Railway Safety Management Plans of their own.

2 THE PROJECT

- 2.1.1. The Project is composed of two sections (i) Halkali- Ispartakule and (ii) Ispartakule-Cerkezkoy which together will provide a new 76km high speed electric rail link connecting Istanbul (at the existing Halkali Station) to just before the existing Cerkezkoy Station to the west. Halkali Station is located within Istanbul province and Cerkezkoy is located in Tekirdag province, both in the north-west of Turkey. The Project will accommodate passenger and freight trains.
- 2.1.2. The Project will consist of:
- A new double track 9km line (i.e. two new lines) between Halkali Station and Ispartakule Station. In order for the Project to pass under the proposed Kanal Istanbul project a 6km twin-bored tunnel will be constructed in this section. The twin-bored tunnel will contain two high-speed tracks with one line for each direction (though bi-directional operation will also be possible, if necessary). The twin-bored tunnel tracks will be suitable for use by both conventional and high-speed trains. Conventional trains will re-join the existing railway prior to Ispartakule Station;
 - A new double track 67km line from Ispartakule to a location adjacent to the east of Cerkezkoy Station (approximately 1km from the centre of Cerkezkoy);
 - Modification of existing infrastructure, but not buildings, at the 3 existing stations (Halkali (0km from Halkali), Ispartakule (9km from Halkali) and Çatalca (32km from Halkali)), including the provision of footbridges, platforms and additional tracks;
 - New ancillary structures, inclusive of bridges, viaducts, tunnels, overpasses and underpasses;
 - Supporting power supply systems, inclusive of overhead lines and substations; and
 - Supporting electrification, signalling and control systems.
 - and substations; and
 - Supporting electrification, signalling and control systems.
- 2.1.3. The location of the Project is shown **Figure 2-1**.

THIS DRAWING MAY BE USED ONLY FOR THE PURPOSE INTENDED AND ONLY WRITTEN DIMENSIONS SHALL BE USED

- Legend**
- Town
 - ⊠ Railway Station (Current)
 - +— Existing Railway Route
 - Proposed Railway Route



Note:

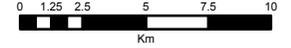
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Job Title: **HALKALI-ISPARTAKULE-CERKEZKOY RAILWAY LINE**

Drawing Title: **Figure 2-1 - Project Location**

Scale at A4: **1:300,000**

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Drawing Number: **Figure 2-1**



Path: \\uk.wspgroup.com\central\data\Projects\700699xx\70069978 - IPPF - Turkey TCDD Halkalı - Cerkezköy High Speed Railway\03 WPGIS\MXD\Figure 2-1 - Project Location.mxd

3 PROJECT ENVIRONMENTAL, HEALTH, SAFETY AND SOCIAL REQUIREMENTS

3.1 OVERVIEW

3.1.1. The Contractor(s) are subject to national legislation as well as EU environmental, health, safety and social (EHSS) legislative requirements, and the performance requirements of the Lenders. Project Standards, which are detailed below, are summarised as follows:

- The Lenders Environmental and Social Requirements;
- European Union legislative requirements;
- International Conventions and Protocols Turkey is a party to;
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines; and
- National legislative requirements, including all permits, licenses and approvals.

3.1.2. If and when national regulations differ from EU substantive environmental standards, the Project will be expected to meet the most stringent of these.

3.2 THE LENDERS ENVIRONMENTAL AND SOCIAL REQUIREMENTS

The Project will be required to comply with the EBRD Environmental and Social Policy (ESP) and Performance Requirements (PRs) 2014.

3.2.1. The EBRD PRs cover key EHSS issues in order to ensure that the Project will operate in compliance with the highest international standards. The PRs are as follows:

- PR1: Assessment and Management of Environmental and Social Impacts and Issues;
- PR2: Labour and working conditions;
- PR3: Pollution prevention and abatement;
- PR4: Health and Safety;
- PR5: Land acquisition, involuntary resettlement and economic displacement;
- PR6: Biodiversity conservation and sustainable management of living natural resources;
- PR7: Indigenous people (not applicable to this Project as no indigenous peoples are present in the Project area);
- PR8: Cultural heritage;
- PR9: Financial intermediaries (FI) (not applicable to this Project as there are no Financial Intermediaries involved in the Project); and
- PR10: Information disclosure and stakeholder engagement.

3.2.2. The Project will be compliant with AIIB's Environmental and Social Framework 2016. The AIIB have elected to apply the EBRDs Environmental and Social requirements on the Project.

3.2.3. In addition to these Lenders requirements that the Contractor must adhere to, the EBRD will also apply their Independent Project Accountability Mechanism (IPAM) and AIIB their Project-affected People's Mechanism (PPM).

3.2.4. The EBRDs IPAM is their independent accountability mechanism, which reviews environmental, social and transparency-related issues raised by Project-affected people and civil society organisations about Bank-financed Projects, which are believed to have caused harm.

- 3.2.5. The AIBs PPM, provides an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been, or are likely to be, adversely affected by AIB's failure to implement its Environmental and Social Policy (ESP), when their concerns cannot be addressed satisfactorily through Project-level grievance redress mechanisms, or AIB Management's processes.

3.3 EU ENVIRONMENTAL, SAFETY AND INTEROPERABILITY STANDARDS

- 3.3.1. The Project must comply with the following EU legislation:

- EIA Directive (2014/52/EU)
- EU Water Framework Directive (2000/60/EC)
- EU Waste Framework Directive (2008/98/EC)
- EU Groundwater Directive (2006/118/EC)
- EU Birds Directive (2009/147/EC)
- EU Habitats Directive (92/43/EEC)
- EU Ambient Air Quality Directive (2008/50/EC)
- European Framework Directive on Safety and Health at Work, 1989 (89/391/EEC)
- European Directive on Workplace Requirements, 1989 (89/654/EEC)
- European Regulation is the Common Safety Method- Risk Assessment (CSM-RA), 2013 (No. 402/2013) (as amended in 2015 (No. 1136))
- Interoperability of the Rail System within the European Union Technical Directive (EU 2016/797/EU)
- EU Directive 2008/68/EC concerning the International Carriage of Dangerous Goods by Rail

3.4 INTERNATIONAL CONVENTIONS

- 3.4.1. Turkey has ratified several international environmental conventions and protocols that are of relevance to the Project, these are listed below:

- United Nations Framework Convention on Climate Change 1992
- Kyoto Protocol 1997
- Paris Agreement 2015
- Convention on Biological Diversity 1992
- Convention Concerning the Protection of the World Cultural and Natural Heritage 1972
- Convention on the Conservation of European Wildlife and Natural Habitats 1979
- Protocol on Water and Health 1999
- The Vienna Convention for the Protection for the Ozone Layer 1989
- Stockholm Convention on Organic Pollutants 2001
- Convention on Long-range Trans-Boundary Air Pollution (CLRTAP) 1983
- World Heritage Convention 1972
- International Covenant on Economic, Social and Cultural Rights 2000
- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labour Convention, 1930 (No. 29)
- Equal Remuneration Convention, 1951 (No. 100)
- Abolition of Forced Labour Convention, 1957 (No. 105).
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Minimum Age Convention, 1973 (No. 138)

- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Convention concerning International Carriage by Rail, COTIF, 1999

3.5 OTHER INTERNATIONAL GUIDELINES

3.5.1. The Project has also considered the following international guidelines to complement those described above where further guidance is appropriate or specific guidance is absent:

- World Bank Group Environmental, Health, and Safety (EHS) industry sector guidelines for Railways (2007); and
- Guiding Principles on Business, United Nations, and Human Rights (2002).

3.6 NATIONAL LEGISLATION

3.6.1. This section lists key Turkish legislation that applies to this **CMP**. The Contractor will need to comply with any other specific legislation while conducting the services, as required.

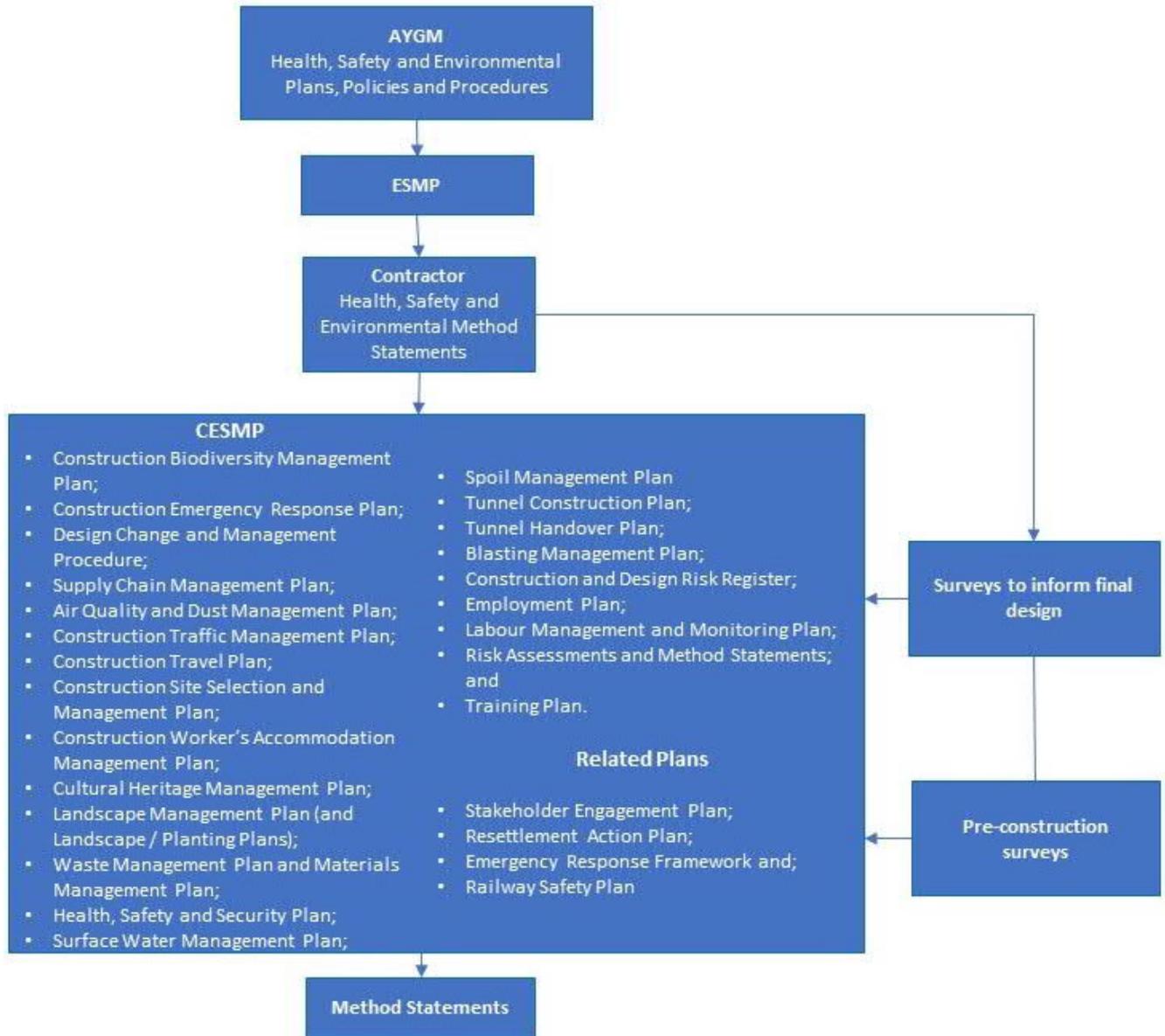
- The Environment Law No.2872 (1983)
- Regulation on Environmental Impact Assessment (EIA Regulation) (2014)
- Regulation on Waste Management (2015)
- Regulation on Control of Pollution of Water and its Surroundings by Hazardous Substances (2005)
- Regulation on the Control of Hazardous Wastes (2005)
- Regulation Regarding Point Source Land Pollution and Soil Contamination Control (2010)
- Regulation on the Management of Surface Water Quality (2012)
- Regulation on Environmental Permit and Licence (2014)
- Regulation on the Assessment and Management of Air Quality (2008)
- Regulation on the Control of Industrial Air Pollution (2009)
- The Law on Soil Preservation and Land Utilisation No.5403 (The Land Utilisation Law) (2005)
- Regulation on the Assessment and Management of Environmental Noise (2010)
- Energy Efficiency Law No.5627 (2007)
- Labour Law No.4857 (2003)
- Constitution of the Republic of Turkey (1982)
- Turkish Penal Code (2005)
- The Equal Opportunities Commission for Women and Men Law No.5840 (2009)
- Occupational Health and Safety (OHS) Law No.6331 (2012)
- Civil Servants Act 657 (1965)
- Social Assistance and Encouragement of Solidarity Law No.3294 (1986)
- Social Services and Child Protection Agency Law No.2828 (1983)
- Regular Cash Support for Turkish Citizens who are 65 Years of Age or Older and Poor and Alone Law No.2022 (1976)
- Social Security and General Health Insurance Law No. 5510 (2006)
- Expropriation Law No. 2942 (1982)
- Forest Law No.6831 (1956)
- Pasture Law No.4342 (1998)
- Cadastral Law No. 3402 (1986)
- Land Registry Law No. 2644 (1934)
- Agricultural Reform Law on Land Arrangement in Irrigated Areas No. 3083 (1984)
- Law on Soil Protection and Land Use No. 5403 (2005)

- Resettlement Law No.5543 (2006)
- The Notification Law No. 7201 (1959)
- Land Registry Code (Official Gazette No.28738) (2013)
- Law of Population Services No.5490 (2006)
- Groundwater Law No.167 (1960)
- Law on Conservation of Cultural and Natural Property No.2863 (1983)
- Mining Law No.3213 (1985)
- Municipality Law No.5393 (2005)
- National Parks Law No.2873 (1983)
- Public Health Law No.1593 (1930)
- Highway Traffic Law No.2918 (1983)
- Electricity Market Law No.6446 (2013)
- Regulation on Occupational Safety and Health in Construction No. 28786 (2013)
- The Law on the Environment (1983) – as amended in 2006 and 2018 (Law No.5491 and Law No.7115 respectively).
- Regulation on Control of Water Pollution (2004) – as amended in 2010 and 2016
- Regulation on the Protection of Wetlands (2014)
- Regulation on Control of Pollution Caused by Dangerous Substances in Aquatic Environment (2005)
- Regulation regarding Protection and Management of Water Mains (2012)
- Regulation on the Quality and Treatment of Water Intended for Potable Water Supply (2019)
- Law No. 4881 on the Approval of the European Landscape Convention (2003)
- Regulation on Control of Waste Oils (2008)
- Regulation regarding Protection and Management of Water Basins (2012)
- Bylaw on the Protection of Groundwater Against Pollution and Deterioration (2012)
- Zero Waste Regulation (2019)
- Regulation of the Control of Excavation Soil and Construction and Demolition Waste (2004)
- Regulation on the Control of Major Industrial Accidents Official Gazette: 30702 (2019)
- Regulation About Buildings to be Made at Disaster Areas No. 26511 (2007)
- Law on Measures and Assistance to be put into Effect regarding Disasters Affecting the Life of the General Public No. 7269 (1959)
- Turkey Earthquake Building Regulations No. 30364 (2018)
- Regulation on Railway Safety Official Gazette: 29537 (2015)
- Regulation on Railway Transport of Dangerous Goods (prepared in parallel with COTIF C-RID) Official Gazette: 29418 (2015)
- Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (TURKISH REACH) Official Gazette: 30105 (2017)
- Regulation on Classification, Labeling and Packaging of substances and mixtures (CLP) Official Gazette: 28848 (2013)
- Regulation on the Transportation of Dangerous Goods by Road Official Gazette: 26479 (2007)
- Regulation on Safe Transportation of Radioactive Materials Official Gazette: 25869 (2005)

4 AYGM POLICIES AND PROCEDURES

4.1.1. The Contractor will be required to align their own EHSS management systems with those of AYGM and the Project.

Figure 4-1 - Project Policies and Procedures



4.1.2. The main elements of AYGM's environmental and social policy framework applicable to the Contractor are as follows:

- Respect national culture and intercultural sensitivities, universal human rights and natural resources and contribute to environmental protection measures and improve the quality of life in areas where AYGM operates;
- Adopt the concept of corporate social responsibility;

- Compliance with the UN Declaration of Human Rights;
- To measure, evaluate and supervise environmental and social performance according to national standards and industry best practices in order to ensure continuous improvement;
- Attaching great importance to maintaining an active and open dialogue with stakeholders, to improve the corporate image, thus create trust between AYGM and Project Affected Communities; and
- Encouraging ethical business practices promoting a good corporate image for the Project.

4.1.3. The Contractor will be required to align their policies and procedures to align with the following AYGM policies, which will be developed for the Project:

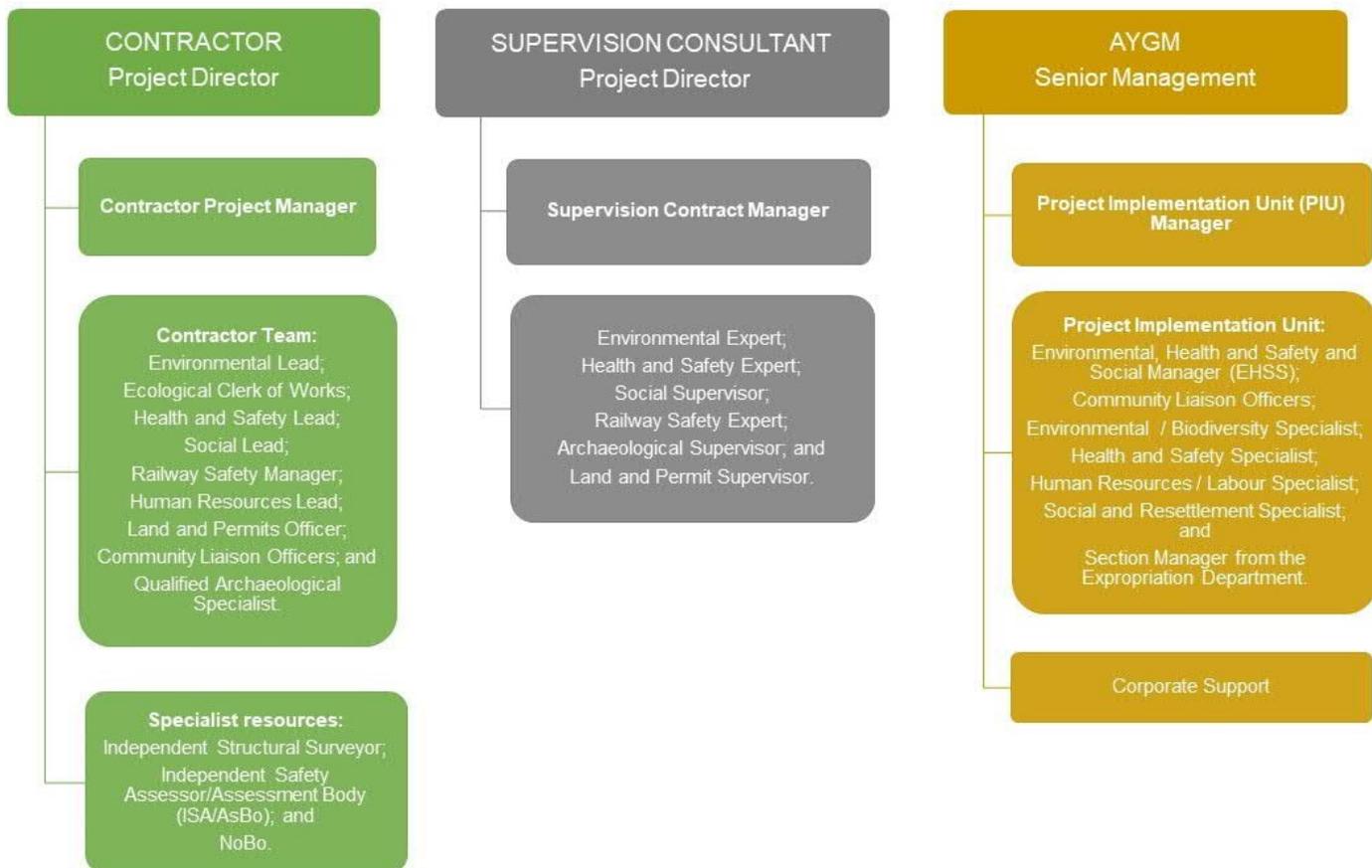
- Environmental and Social Management System (ESMS);
- Environmental, Health and Safety (EHS) Policy;
- Human Resources Policy and Procedures;
- Discrimination and Harassment Policy;
- Gender Equality and Gender Based Violence and Harassment (GBVH) Action Plan; and
- Labour Management Procedure and Contractor Code of Conduct.

5 ROLES AND RESPONSIBILITIES

5.1 INTRODUCTION

- 5.1.1. The commitments within this **CMP** are the responsibility of both AYGM and the Contractor. The Contractor will form a partnership with AYGM and will work together to execute each phase of works. The Contractor will present all the necessary information and procedures to the sub-contractors.
- 5.1.2. The specific responsibilities for implementing specific measures and actions are identified in the **ESMP**, which clearly distinguishes between AYGM, the Supervision Consultant, and the Contractor. **Figure 5-1** below details the key roles under AYGM, the Supervision Consultant, and the Contractor during the construction phase of the Project.

Figure 5-1 - Contractor, Supervision Consultant, and AYGM Roles



5.2 AYGM ROLES AND RESPONSIBILITIES

- 5.2.1. AYGM has responsibility for the overall management of the construction phase of the Project. AYGM will establish a Project Implementation Unit (PIU), comprising of professional staff and consultants, which will oversee the Project and represent AYGM. The PIU will be responsible for the

implementation, financial management and overall delivery of the Project. AYGM management will be responsible for the appointment of the PIU and the provision of training for the PIU.

5.2.2. The AYGM PIU has the following responsibilities related to the EHSS aspects of the Project:

- The PIU will be responsible for the implementation of mitigation measures and management procedures specified within the disclosure package of the Project, including the Environmental and Social Management System (ESMS), Environmental, Health and Safety (EHS) Policy, Human Resources Policy and Procedures, Discrimination and Harassment Policy, a Gender Equality and GBVH Action Plan, and Labour Management Procedure.
- The PIU will oversee the preparation and implementation of **CESMP**, which will be developed by the Contractor(s), to ensure they fulfil all the identified EHSS requirements for the Project.
- The PIU is responsible for ensuring roles and responsibilities are clearly identified and allocated for the EHSS aspects of the Project, both within the PIU itself, and within the workforce provided by the Contractor, Sub-contractors and other involved third parties.
- The PIU will be responsible for the implementation of the Project-level grievance mechanism (GM) to ensure that all grievances and/or objections (raised by affected stakeholders or communities) are received, acknowledged and addressed, as per the grievance procedure set out in the **SEP**. The Contractors will need to align their own grievance mechanism process with the project-level GM and the requirements in the **SEP**.
- The PIU will implement the **Biodiversity Management Plan** (BMP) which will cover actions to safeguard and conserve biodiversity that could be affected by the Project.
- The PIU will implement a **Resettlement Action Plan** (RAP) to ensure any potential impacts from the Project area addressed in compliance with Turkish legislation and the Lenders PRs.
- The selection and management of the Contractor(s).
- The provision of the legal authorisations, including expropriation, required to allow the construction to commence, including the transfer of expropriated land to the Contractor.
- The review, quality assurance, approval and monitoring of the Contractors responsibilities and implementation including:
 - **CESMP** and sub-plans (see Section 1.3);
 - Method statements (see Section 5.4);
 - Labour management procedures (see Chapter 4: AYGM Policies and Procedures);
 - Employment process for workers (see Chapter 5 and
 - Occupational health and safety standards (see Chapter 5).
- The approval of the Contractors training programme, and monitoring of the Contractors training for construction workers, including construction site inductions, environmental toolbox talks, health and safety and social inductions, as required in the **ESMP**.

5.2.3. The AYGM PIU will coordinate with the Contractor to ensure a collaborative approach is taken to processes during the construction phase. The Contractor will develop a Project Schedule which will identify contractual and significant milestones. Engineering meetings with the PIU Project Manager, Supervising Engineer and Contractor Project Manager will be conducted on a weekly basis to provide visibility of work being undertaken and provide an opportunity for discussion between AYGM and the Contractor.

5.2.4. The AYGM PIU will be responsible for appointing technical specialists to effectively audit the implementation of EHSS measures. These specialists will include:

- **PIU Manager** – responsible for overseeing the activities undertaken by the PIU specialists (listed below), overseeing the implementation of mitigation measures and management procedures specified within the disclosure package of the Project, and overseeing the preparation and implementation of a **CESMP**, which will be based on the **ESMP**.
- **Environmental, Health and Safety, and Social (EHSS) Manager** – responsible for overseeing all matters that relate to Environment, Health, Safety and Social aspects of the Project. They will be supported by experts within the PIU, and other AYGM departments, as required.
- **Community Liaison Officers (CLOs)** – One male and one female will be appointed to be responsible for supporting the implementation of the **SEP**, by conducting regular consultation with affected communities on any concern regarding the Project. CLOs will also have responsibility for disseminating the Project disclosure package as described in the **SEP**. They will also conduct regular inspections of records relating to grievances received and their resolution.
- **Environmental / Biodiversity Specialist** - Responsible for overseeing the implementation of all environmental and biodiversity measures, as specified within the disclosure package of the Project, and regular reporting to senior management and the lenders.
- **Health and Safety Specialist** - responsible for overseeing health and safety for the Project.
- **Human Resources / Labour Specialist** - responsible for overseeing the implementation of all health, safety and social measures, as specified within the disclosure package of the project, and regular reporting to senior management and the lenders.
- **Social and Resettlement Specialist** – Responsible for overseeing the implementation of the **RAP**, livelihood and PR5 matters in relation to expropriation, with support from the Livelihood Restoration Specialist and Social Specialist. Supporting the monitoring of the **RAP** and appointing the external **RAP** monitoring consultant. Responsible for overseeing the implementation of the **SEP**, with support from the Social Specialist.
- **Section Manager from the Expropriation Department** – Responsible for leading expropriation activities in accordance with national legislation. They will be supported by experts within the PIU, and other departments, as required.

5.2.5. Further technical staff may be required during the course of the Project, who will be assigned internally by the PIU, either by means of permanent or temporary basis until the completion of relevant tasks under the Project whilst they undertake their current responsibilities.

5.2.6. AYGM will appoint a Supervision Consultant, consisting of a range of expertise, to supervise the activities of the Contractor on a day to day basis. The roles within the Supervision Consultant will include the following;

- **Supervision Contract Manager** - Responsible for supervising the Contractor to ensure that recommendations and requirements, as set out in the disclosure package, are applied. They will be responsible for continuous monitoring of the processes and activities undertaken by the Contractor, and specifying measures to be implemented by the Contractor, to address any areas of non-compliance. This includes periodic audits, inspections, and/or spot checks of project locations or work sites and/or of records and reports compiled by contractors.
- **Environmental Expert** - Responsible for supervising the Contractors, and their sub-contractors, management of environment related matters. Including regular site inspections and regular reporting to PIU. Supported by an Environmental Field Officer and Ecologist/Biodiversity Specialist.
- **Health and Safety Expert** - Responsible for supervising the Contractors, and their sub-contractors, management of H&S. Including regular site inspections and regular reporting to PIU.

- **Social Supervisor** - Responsible for supervising and monitoring the Contractors management of social matters including the stakeholder engagement by CLOs, land related activities and implementation of the **RAP**.
- **Railway Safety Expert** - Responsible for supervising, monitoring and auditing the Railway Safety Manager and implementing their responsibilities in the Railway Safety Plan.
- **Archaeological Supervisor** - Responsible for supervising the Contractors archaeologists. Including regular site inspections and regular reporting to PIU, and ensure the Regional Board is engaged and notified, as required.
- **Land and Permit Supervisor** – Responsible for supervising the activities of the Contractor's Land and Permits Officer.

- 5.2.7. The PIU may also provide the Contractor with standard documents for different activities on site to improve communication between parties and manage processes efficiently.
- 5.2.8. The PIU shall ensure that Contractor employs qualified EHSS personnel to oversee EHSS performance, and that contractor staffing, and resources are aware of and comply with the magnitude and timing of work and avoid potential environmental and social risks.
- 5.2.9. The PIU will incorporate the requirements of relevant PRs and the **ESMP** conditions into contractual agreements with the Contractor, together with appropriate non-compliance remedies. The non-compliance remedies will be established prior to the bidding process. The labour management procedure will be updated periodically to reflect non-compliance remedies.
- 5.2.10. A grievance process has been developed in line with PR10: Information disclosure and stakeholder engagement to ensure that community concerns can be raised through a meaningful mechanism. Recording and follow up of grievances (including environmental issues) will be the primary responsibility of the PIU. The PIU will appoint a Social Specialist with responsibility for the implementation of the **SEP**, including the grievance mechanism. Further detail of the Project grievance mechanism is set out in the **SEP**. The Contractor will be responsible for implementing a structured grievance mechanism of their own so that construction workers have the opportunity to express their concerns. The grievance mechanism for construction workers is set out in Section 8.16.

5.3 COOPERATION AND COMMUNICATION

- 5.3.1. AYGM and the Contractor are expected to meet the requirements of EBRD & AIIB, all legislation, procedures and standards, as set out in Chapter 3 of this **CMP**, to ensure the Project has a good reputation. It is therefore necessary to cooperate with and apply best management practices, addressing issues in an efficient and timely manner and update mitigation where necessary.

5.4 CONTRACTOR'S ROLES AND RESPONSIBILITIES

- 5.4.1. The Contractors predominant responsibility will be to ensure that all their work and staff activity is compliant with the legislation, policies and standards for EHSS and the permits provided by national (and local) regulators. Key responsibilities for the Contractor include;
- Elaborating the **ESMP** to prepare and implementing the **CESMP** and sub-plans (see Section 1.3), as well as applicable sections of other plans including the **SEP**, **RAP**, **BMP**, **ERF** and **Railway Safety Plan** (see Section 1.4).
 - Undertaking stakeholder engagement, as noted in Section 5.5.4, and set out in the **SEP**. This requires the establishment of a grievance mechanism, as set out in Section 8.16 of this **CMP**.

- Appointing a Project Manager and technical specialists, to ensure environmental, social, health and safety mitigation is implemented correctly, in line with best practice, national and international requirements. As a minimum the Contractor will appoint the following specialists:
 - **Contractor Project Manager** - responsible for overseeing the construction of the Project, including planning and delivery. They will be suitably competent and have a strong understanding of construction best practice. The Project Manager is accountable for overall EHSS performance, and making the human and financial resources available to ensure compliance with EHSS requirements of the Contract. The Project Manager will take on the role of **Emergency Manager** in an emergency situation, and will be responsible for coordinating the internal management response of the Contractor to a major emergency (as detailed in the **Emergency Response Framework**). The Project Manager will also be responsible for appointing a First Aid competent person(s) on site, as well as a team responsible for site security.
 - **Construction/Site Manager(s)** – responsible for implementation of the CESMP measures through method statements and site working practices.
 - **Environmental Lead** - responsible for reporting and supervising environmental activities on site. They will be suitably competent (with a minimum of 10 years' experience including 8 in a similar role) and have a strong understanding of environmental best practice including the Project EHSS requirements.
 - **Ecological Clerk of Works (ECoWs)** will provide biodiversity support in advance of, and throughout construction, including pre-construction surveys. Given the scale of the Project, it may be necessary for an ECoW 'team' to be employed at certain points. This role will have a wide-ranging brief but ultimately will focus on ensuring required ecological mitigation is appropriately undertaken and measures are maintained throughout construction, in accordance with the **ESMP** and **BAP**. The ECoWs will be suitably competent and have ecological knowledge.
 - **Health and Safety Lead** - responsible for the implementation of health and safety practices during construction. They will be suitably competent (with a minimum of 10 years' experience including 8 in a similar role) and have a strong understanding of health and safety best practice including the Project EHSS requirements.
 - **Social Lead** - responsible for reporting and supervising social activities on site, stakeholder engagement and grievance management. They will be suitably competent (with a minimum of 10 years' experience including 8 in a similar role) and have a strong understanding of environmental best practice including the Project EHSS Requirements.
 - **Railway Safety Manager** - Responsible for ensuring railway safety practices are implemented during construction, in accordance with the Common Safety Method-Risk Assessment (CSM-RA) and the Preliminary Hazard Record. The Railway Safety Manager is responsible for the implementation of Contractor and sub-contractor obligation within the Railway Safety Plan. The Railway Safety Manager will engage with both the AsBo and the NoBo at Project start up and throughout construction. They will have a minimum 6 years' experience of Railway Safety Case work including at least 3 years of application of EU Common Safety Method.
 - **Human Resources Lead** - Responsible for managing all matters relating to human resources management for the Contractor.
 - **Land and Permits Officer** - Responsible for temporary land acquisition during construction, in accordance with the processes and compensation measures in the **RAP**, including land entry

and exit protocols, and permissions to enter permanently acquired for the Project. Also responsible for the return of land to either AYGM or landowners, and the resolution of any grievance related to the contractor's land acquisition processes. Responsible for obtaining any permits required from the provincial authorities.

- **CLOs** – 2 CLOs, 1 male and 1 female, responsible for consultation on temporary land acquisition, providing affected communities with information on the timing of key activities, and identifying and responding to grievances.
- **Qualified Archaeological Specialist** - Responsible for overseeing all matters related to archaeology during construction, including implementing the chance finds procedure. Responsible for submitting the **CHMP** to the regional board and notifying them of the timing of the works at the Anastasius's Walls.
- Some of the above roles will require specific resources to support their activities as follows:
 - Environment Lead will be supported by an Environmental Engineer and Environment Officer;
 - Railway Safety Manager will be supported by Health and Safety Officers; and
 - Human Resources Lead will be supported by a Labour Relations Officer.
- Additional specialist resources will be appointed by the Contractor and include;
 - **Independent Structural Surveyor** - to be appointed to undertake pre-condition surveys at heritage assets which are sensitive to vibration.
 - **Independent Safety Assessor / Assessment Body** - ISA/AsBo will be registered with the European Union and be properly qualified both as an organization and as the individuals involved. The ISA/AsBo shall assess the safety deliverables of the Project at discrete points within the project lifecycle against requirements of CSM-RA.
 - **Notified Bodies (NoBo)** - The NoBo will be fully qualified and notified with the EU to validate the Project's compliance with Technical Specifications for Interoperability (TSIs).
- Appointing Sub-Contractors and ensuring their compliance with the **CESMP** as applicable to their construction tasks.

ESMP

- 5.4.2. The **ESMP** describes the tasks to be undertaken by both AYGM and its Contractor. The Contractor will be required to elaborate the **ESMP** and develop a detailed **CESMP** and the specified management plans/action plans, which will reflect the commitments in this **CMP** and the **ESMP**, demonstrating how they will meet these commitments.
- 5.4.3. In addition to producing the **CESMP** sub-plans, the Contractor must also develop site specific method statements for working in protected areas and sensitive habitats. This is further detailed in the **Biodiversity Management Plan (BMP)**.

STAKEHOLDER ENGAGEMENT

- 5.4.4. The Contractor CLOs will be expected to work alongside the PIU Community Liaison Officers and Supervision Consultant's CLOs to engage directly with local communities, to share information on the construction programme and activities, including: access arrangement, diversions, noisy activities, dust, safety risks and measures, etc. The Contractor will also be expected to consult local communities during the selection of the construction compound locations referring to the possible EHSS impacts as well, as required in the **SEP**.

- 5.4.5. Specific stakeholder engagement activities for the Project that the Contractors holds responsibility for are listed in Table 5-1 of the **SEP**.
- 5.4.6. The Contractor's construction workers will indirectly engage with local communities during the construction phase, and this will be managed by the Construction Workers' Code of Conduct, which is a requirement in the **ESMP**. An outline Construction Workers' Code of Conduct is provided in **Appendix A**.

PERMITS

- 5.4.7. Contractors must ensure that relevant requirements of any construction related permits for the Project issued by national (and local) regulators are addressed, as required in the **ESMP**. Any requirements arising from the revision/amendment of those permits will also be applied by the Contractor.

METHOD STATEMENTS

- 5.4.8. Method Statements will be prepared by the Contractor detailing specific conditions and procedures to be followed on site to ensure appropriate controls are in place to manage potential EHSS risks, drawing upon the **CESMP**.
- 5.4.9. Before the construction works commence, the Contractor will need to be granted authorisation to proceed by AYGM. This authorisation should be received, in writing, via an Authorisation Form.
- 5.4.10. The Contractor will establish Contact Point Units (CPU) to assign actions, monitor activities and to take measures to correct any errors at site level. The CPUs for each construction site are responsible for the implementation and monitoring of the procedures set out by AYGM and the Contractor in the Method Statements.

PERFORMANCE MONITORING

- 5.4.11. The Contractor will be responsible for maintaining the required documentation and providing AYGM PIU and the Supervision Consultant's EHSS team on behalf of AYGM PIU, when needed with all the information required for annual performance reports. The Contractor will also be expected to provide EHSS progress updates, as request by the PIU, for input into the Monthly Project Progress report provided to the Project Lenders.
- 5.4.12. The documentation will include but not be limited to:
- Records of environmental, social, health and safety reporting and monitoring as specified in the **ESMP, ESAP, SEP, RAP, BMP** and **ERF**.
 - External and internal grievance records, as specified in the **SEP** and Section 8.16 of this **CMP**;

LABOUR MANAGEMENT PROCEDURES

- 5.4.13. The Contractor will develop and implement a Labour Management and Monitoring Plan in line with this **CMP**, PR2: Labour and working conditions, AYGM policies, national labour law and occupational health and safety laws. The Labour Management and Monitoring Plan will:
- Ensure that all workers (including sub-contractors) employment contracts are in line with both national legislation, applicable ILO standards and recommendations and PR2;
 - Ensure that all workers (including sub-contractors) have employment contracts;
 - Ensure all workers (direct and indirect) have access to human resources policy and procedures;

- Ensure the provision of a flexible working regime, where practicable, for workers who may prefer to work from home due to health issues, child care, home schooling, etc. without fear of victimisation;
- Ensure that mental health is covered during workers inductions and that information is provided on how to seek help from local specialists, if required; and
- Ensure that a zero-tolerance process is in place for discrimination against workers;

5.4.14. The Contractor plan must also comply with the following:

- National Labour Law No.4857 which requires recruitment procedures to be transparent, public and non-discriminatory with respect to language, race, sex, political opinion, philosophical belief, religion or other grounds such as disability, and ethnicity.
- Ensuring all applications for employment are considered in accordance with the application procedures established by the Contractor. These procedures will be submitted to AYGM for approval.
- Ensuring understandable and comprehensible job descriptions (including in a language understood by the employee with a supporting explanation if literacy is an issue) are provided in advance of recruitment and that they explain the skills required for each post.
- Ensuring workers have written contracts describing the terms and conditions of work (in a language understood by the employee) and have the contents explained to them. Workers will sign the employment contract. Terms and conditions of employment will be available at work sites.
- Ensuring workers are informed at least two months before their expected release date of the coming termination.
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Contractor.
- Ensuring that based on origin of the employer and employee; the contracts will be developed in corresponding language clear and lucid for both parties.
- Ensuring that besides the written documentation, verbal statement of conditions and terms of employment will be provided to workers who may have difficulties with understanding the written documentation.
- Ensuring attention is paid to ensuring coordination between different contractors and the means to address any language differences.
- Ensuring all workers, including sub-contractors, adhere to the Construction Workers' Code of Conduct (provided in **Appendix A**), which shall be a condition of employment contracts and will attend mandatory training on environmental and social practices, occupational health and safety and prohibition of harassment and gender-based violence, as set out in the Training Plan in the **ESMP**.

OCCUPATIONAL HEALTH AND SAFETY

5.4.15. Construction workers will be provided with a safe and healthy work environment which accounts for inherent risks and hazards associated with the Project, in accordance with EBRD PR4.

5.4.16. The Contractor will be responsible for elaborating the **ESMP** to develop and implement a CESMP which will include the following sub-plans which consider specific occupational risks associated with the Project:

- Health, Safety and Security Plan, which set out the measures to manage occupational health and safety (OHS) risks.
- 5.4.17. Health and safety risks are associated with construction labour during the construction phase of the Project including exposure to physical, chemical and biological hazards during construction activities such as: use of heavy equipment, trip and fall hazards, exposure to asphalt fumes and rail lubricants, noise and dust, falling objects, exposure to hazardous materials and exposure to electrical hazards from the use of tools and machinery as well as accidents associated with vehicles or plant.
- 5.4.18. As the construction activities will involve hazardous work, persons under the age of 18 will not be employed by the Project or given access to construction sites.
- 5.4.19. Measures to manage potential occupational health and safety hazards will be set out by the Contractor in the Health, Safety and Security Plan, as required in the **ESMP**.
- 5.4.20. Overtime hours may be a potential labour risk. This risk shall be addressed with specific provisions in employment contracts, as set out in the Contractor's Labour Management and Monitoring Plan, as required in the **ESMP**. If further labour risks arise during project implementation, the Contractor will be responsible for developing develop procedures to prevent further impacts.

EMERGENCY RESPONSE FRAMEWORK

- 5.4.21. An **ERF** has been developed for the Project to provide an approach for the Contractor to use to identify emergency events that should be included in the Contractor's Emergency Response Plan (ERP) for the construction phase. The ERF outlines the requirements for the ERP, and the process for identifying effective response measures, which the Contractor will need to prepare for the construction phase.
- 5.4.22. The construction ERP will set out the systems, processes and procedures, resources, roles and responsibilities of the Contractor, and their sub-contractors, in relation to emergency preparedness and response.
- 5.4.23. The ERF has been developed in accordance with PR4: Health and Safety as well as relevant EU and National legislative requirements (set out in Chapter 3 of this **CMP**). The construction ERP will also need to comply with these requirements and be based on an assessment of risk that follows the five-step approach set out below;
1. Identify all potential emergency events;
 2. Evaluate the risk associated with the emergency event;
 3. Develop ERP measures for the emergency event (for inclusion in the Construction ERP);
 4. Implement the ERP measures; and
 5. Monitor and continually review the ERP measures.
- 5.4.24. The Contractor's Health and Safety Expert will be responsible for the preparation and implementation of the Construction ERP, on behalf of the Contractor, prior to and during construction.

5.5 SUB-CONTRACTOR ROLES AND RESPONSIBILITIES

- 5.5.1. The sub-contractors must know, and are required to comply with, the Project EHSS standards set out in Chapter 3. The Contractor is responsible for including these requirements in sub-contracts and ensuring they are cascaded to all sub-contractors. The sub-contractor must have a



representative, with whom the Contractor can communicate the EHSS issues related to the Project and appropriate EHSS personnel commensurate with the risks and impacts of the sub-contractors work. The sub-contractor must ensure that all relevant requirements stated in this document are known and obeyed by their personnel.

- 5.5.2. Any non-compliance experienced due to EHSS responsibilities managed by the sub-contractors will be reported by the Contractor to the AYGM PIU and the Supervision Consultant. The Contractor will ensure adequate corrective / mitigative actions are taken by their sub-contractors.

6 CONTRACTOR SELECTION

6.1 CONTRACTOR SELECTION

6.1.1. A process for selection of Contractors and suppliers will be implemented. AYGM will use the EBRDs 2020 Standard Procurement Documents (or equivalent) for solicitations and contracts, which includes labour and occupational, health and safety requirements.

6.1.2. The process will identify and assess the compliance of the Contractor's existing EHSS and labour management practices against the Project's policies and standards, including their ability to provide all required work and materials/services in compliance with the specified standards.

PREQUALIFICATION

6.1.3. Prequalification will include a request for information that provides useful indicators of the Contractors' understanding, and previous experience, of managing EHSS matters generally. It will also obtain information on their capacity to manage EHSS matters, including existing and potential issues specific to the Project.

SOLICITATION

6.1.4. AYGM will include the following information within the Request For Proposal documents (RFP), to inform prospective Contractors:

- The project-specific environmental and social requirements outlined in this **CMP**, together with the **ESAP, ESMP, RAP, SEP, BMP, ERF** and the **Railway Safety Plan**.
- The policies and standards outlined in Chapter 3 of this **CMP**.
- AYGM's corporate policies and procedures including the ESMS, Environmental Health and Safety Policy, Human Resources Policy and Procedures, Discrimination and Harassment Policy, Gender Equality and GBVH Action Plan, and the Labour Management Procedure.

6.1.5. Prospective Contractors will need to provide a commitment that they will be responsible for the environmental and social performance of their sub-contractors and suppliers.

CONTRACTOR REVIEW

6.1.6. The AYGM Contractor Review Team will review the information provided by potential Contractors and suppliers, as part of the process to select the Contractor such as:

- Past EHSS performance;
- Status of their existing Environmental and Social Management System (ESMS);
- Human Resource (HR) policies, codes of conduct, grievance mechanism controls, including means to address harassment and other forms of Gender-Based Violence and Harassment (GBVH) plus prior reported incidents of Sexual Exploitation and Abuse (SEA) and GBVH;
- Supply chain management criteria;
- Information in public records, for example, corporate registers and public documents relating to violations of applicable labour laws;
- Business licenses, registrations, permits, and approvals;
- Documents relating to a labour management system;
- Confirmation that suitable experts in can be supplied as per the Contractor roles set out in Section 5.4.

- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations, and responses;
- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers' enrolment in the related programs;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting PR2: Labour and working conditions.

6.1.7. The exact requirements will be communicated to bidders during the procurement process and the selection process will be documented, and records will be kept.

CONTRACTING

- 6.1.8. The standard International Federation of Consulting Engineers (FIDIC) Red Book contract template will be used for the draft Project contract, which will be included in the RFP. The draft contract will include project specific conditions relevant to EHSS performance. In order for Contractors to implement the EHSS requirements specified within the **ESAP, ESMP, RAP, SEP, BMP, ERF** and **Railway Safety Plan**, the contract will include direct references to these documents. These documents and the EHSS sub-plans and associated documentation that must be prepared, or elaborated, and implemented by the Contractor should be will be listed in the environmental and social conditions of the contract. These documents shall be submitted for AYGM review and approval within an agreed timeline relative to the Project Schedule, Contractor mobilisation, and commencement of work.
- 6.1.9. An organisation chart illustrating reporting lines for EHSS personnel of both the Contractors and their sub-contractors in relation to AYGM, is a key aspect of the contract negotiations and must be included with the contract documentation. This organisation chart must align with the roles and responsibilities in Chapter 5.
- 6.1.10. The EHSS professionals in the PIU will review the contract to assess any general EHSS requirements present.
- 6.1.11. The contract shall include general and project-specific requirements for the following:
- The elaboration of the **ESMP** to develop and implement the **CESMP** and sub-plans, as well as applicable sections of other plans including the **ESAP, SEP, RAP, BMP, ERF** and **Railway Safety Plan**;
 - The number of and qualifications that the environment, social, health and safety personnel are required to have, including those roles detailed in Chapter 5 above;
 - The nature, risks, and complexity of the Project including the scope of work of the service being contracted;
 - The contract will list the plans and sub-plans the Contractor is to develop for AYGM approval and the plans that may have been prepared by AYGM for contractor implementation;
 - Explicit commitment to compliance with the Project commitments as captured in the **ESMP, ESAP, SEP, RAP, BMP, ERF** and **Railway Safety Plan** and the legislation (set out in Chapter 3 of this **CMP**) and acquisition of all required permits, licenses, consents, and approvals prior to undertaking the activities being permitted or otherwise approved;

- Specific reference to the Lenders policy requirements and other international guidelines (as outlined in Chapter 3 of this **CMP**);
- Adherence to the Construction Workers' Code of Conduct (see **Appendix A**);
- The implementation of training requirements as set out in the Training Plan, as required in the **ESMP**;
- The Contractors monitoring of the EHSS performance of their construction workers and sub-contractors, as required in the ESMP, and AYGM's role in this.
- The monitoring of EHSS parameters, as detailed in the **ESMP**, that contractor is required to carry out;
- The implementation of the grievance mechanism for construction workers (including subcontracted workers), as outlined in Section 8.16 of this **CMP**;
- It will elaborate the Project grievance mechanism in the **SEP**, including reporting on grievances and how they are addressed between the contractor and AYGM, as outlined in Section 8.16 of this **CMP**;
- Assurance that the AYGM's project-level grievance mechanism for external stakeholders, as set out in the **SEP**, will be adopted by the contractor, and sub-contractors, and there is clear communication to stakeholders on how to address grievances related to the activities of the contractors, including both works on the Project site(s) and in any ancillary facilities and infrastructure;
- Creation and maintenance of records on EHSS performance, and reporting requirements, as required in the **ESMP**;
- The environmental conditions under which the Contractor will be allowed to demobilize and leave the site, including conditions of site restoration and requirements for handling personnel retrenchment, particularly those involving local workers, as required in the **ESMP**;
- A clear statement in the contract that says the Contractor is responsible for the EHSS performance of sub-contractors and suppliers and shall consider EHSS aspects in sub-contractor and supplier selection;
- A clear statement in the contract that says that on the contractor's failure to meet the EHSS requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals, and/or environmental resources, and on the contractor's failure to correct such deficiencies upon receiving proper notice, AYGM has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the Contractor in the amount paid to the third party;
- The specific mitigation measures to control EHSS impacts during construction work are to be considered as part of the works themselves, not measures that are needed in addition to the main works.

6.1.12. The defined methods the Contractor will use to estimate costs and payments must be adequate to allow the Contractor to effectively implement the various EHSS commitments related to EHSS performance. Payment for the completion or partial completion of work milestones shall be based in part on satisfactory performance of related EHSS requirements.

PROPOSAL EVALUATION

- 6.1.13. The evaluation criteria will be established alongside the bid packages including EHSS aspects.
- 6.1.14. The team evaluating proposals will include health, safety, environment, social professionals from the PIU to evaluate bidders' health, safety, environment and social qualifications.

7 CONTRACTOR ENGAGEMENT AND MANAGEMENT

- 7.1.1. The **CMP** highlights and sign-posts all the responsibilities, requirements and work statements that are expected of the Contractors and how these will be delivered to AYGM. The parties will establish methods of communication to monitor actions and to correct any errors or non-conformances. All the proposed solutions will be reported to AYGM. This structure of communication is responsible for decisions, updating the CESMP and other documents and outlining the procedures which are able to be applied on all sites or on specific sites.
- 7.1.2. The approach to managing the Project will be based on the following principles:
- AYGM is responsible for project management and for the control and monitoring of the Contractor's activities and has overall responsibility for EHSS aspects of the Project.
 - AYGM will issue a request for prequalification information prior to the request for proposal document.
 - AYGM will establish the conditions and obligations for Contractors on the request for proposal document;
 - A Statement of Work will be drawn by AYGM jointly, with the Contractor and their sub-contractors taking responsibility for the services outlined in its areas of responsibility. The scope of the contracted work, contained in the Statement of Work, will be described in terms of:
 - Responsibilities and authority limits of each party to the contract;
 - A clear definition of the deliverables and minimum content to be provided by the Contractor;
 - A clear definition of the services to be provided by the Contractor and deadlines for delivery of services;
 - Any and all constraints imposed on the Contractor by AYGM, including programme and budget constraints as well as all EHSS constraints; and
 - A clear statement of requirements to be used to determine the quality of deliverables and services including the requirement to allow independent quality inspections of materials and processes.
 - Effective channels of communications will be clearly defined and established within the Statement of Work document;
 - All products and services provided by the Contractor and their sub-contractors will be subject to the approval of AYGM;
 - Each subcontract will contain appropriate terms and conditions;
 - Contractors will support sub-contractors in processing invoices and payments, subject to the invoices being delivered to AYGM in an acceptable format. To this end, AYGM will establish format requirements for invoices in list of Standard Documents;
 - The Contractors will be directly responsible for their part of the contract in relation with AYGM, which includes the subcontracted parts; and
 - The Contractors will be obliged to contract with only reliable sub-contractors, and only with the written approval issued by AYGM.

8 CONTRACTOR MANAGEMENT PROCESSES

8.1.1. This section sets out Contractor Management processes that will be applied by AYGM.

8.2 DOCUMENT MANAGEMENT

8.2.1. The AYGM PIU and the Supervision Consultant on behalf of AYGM PIU will monitor the progress of the Project throughout the construction phase. The Contractor will establish Contact Point Units (CPU) to assign actions, monitor activities and to take measures to correct any errors on site, which will be reported back to the PIU. This structure of communication will be used for decision making, establishing procedures on sites, and updating the CESMP, and other documents, where necessary.

8.2.2. AYGM will provide the Contractor with standard document templates where appropriate.

8.2.3. The Contractor will have a legally binding, written contract. The legal names of the parties involved in the contract will be specified.

8.2.4. Contractors enter into a contract with AYGM after the bidding procedure. The Contractor will present the information for all sub-contractors and the procedures for verification and validation services.

8.2.5. The CPU represents the method of communication on site between AYGM and the Contractor. All collected data, reports, and other information will be submitted to AYGM.

8.3 WORK EFFORT INTEGRATION

8.3.1. The work of all Contractors will be supervised by AYGM to assure that the efforts of all parties are integrated through the processes of concurrent engineering and top-down project control. A Project Schedule will be developed that establishes schedule constraints and identifies contractual and significant internal milestones. Intermediate schedules will be established that clearly show key project milestones and the interdependencies of the construction activities.

8.3.2. Concurrent engineering meetings will be conducted on a regular basis to provide visibility into work being performed and provide an opportunity for discussion among the AYGM and Contractors.

8.4 BOUNDARIES BETWEEN AYGM AND CONTRACTORS

8.4.1. Each Contractor will have a single point of contact with AYGM for contractual matters, who will work in the site office with AYGM representatives. Contact points, at each site, will monitor the activities and compliance of the Project activities against the General Commitments Register. Weekly they will report to AYGM about achievements and problems and progress.

8.5 BOUNDARIES AMONG SUB-CONTRACTORS

8.5.1. Each Contractor/sub-contractor will identify their responsibilities and authorities. This information will be published in a Project contact sheet. Informal, mutually beneficial contact is encouraged. However, to avoid schedule slippage, the interdependencies of sub-contractor's efforts will be identified on the intermediate schedules described in Section 8.3. These intermediate schedules will make the formal boundaries visible.

8.6 WORK AUTHORISATION

- 8.6.1. AYGM will only allow the Contractor entry to site following verification that the CESMP and all relevant sub-plans are in place. The Contractor will need to demonstrate that temporary land access has been secured and the associated RAP provisions and protocols have all been implemented for specific working areas. These measures will need to be approved by the PIU before an Authorisation to commence work and a Work Permit can be issued.
- 8.6.2. The Contractors must receive a Work Permit before billing any time and/or materials.
- 8.6.3. This permit will authorise the start of work, will identify the deliverable(s), will identify budget and schedule constraints, will identify the responsible manager, and will identify the reviewers and acceptors of the products or services. When the authorised work is complete, the Work Permit Form will be closed, and the authorisation withdrawn.

8.7 KICK-OFF MEETING AND SITE INDUCTION

- 8.7.1. Prior to early work activities, AYGM will hold a kick-off meeting with the Contractors and major sub-contractors, prior to arrival at the site. The purpose of this meeting will be to review planned activities and the Project Schedule, review EHSS requirements, review the roles of the various parties in implementing and monitoring mitigation measures, and agree on Project-specific induction and training content.
- 8.7.2. The kick-off meetings will include a discussion about control of access to the site, how to best coordinate the security management system, and management of EHSS activities at both the main construction compounds (including Worker's accommodation) and any other construction sites. The PIU's Environmental, Health, Safety and Social Manager, along with the Supervising Consultant's Environmental Expert, Health and Safety Expert, and Social Supervisor, and the Contractor's Project Manager, Environmental Lead, Health and Safety Lead, and Social Lead should be present to reiterate all environmental and social commitments and establish initial compliance points and coordination requirements during site establishment.

8.8 SITE VISITS

- 8.8.1. The Supervision Consultant's Environmental Expert, Health and Safety Expert, and Social Supervisor will visit the site daily during the first weeks of construction activities to guide the Contractor's Project Manager, Environmental Lead, Health and Safety Lead and Social Lead in overseeing activities and ensuring that there are common expectations on EHSS performance. This will continue for the duration of the activity to ensure adequate supervision, proactive monitoring, and sound EHSS performance, using different approaches and varying the times of sites visits, such as inspections, and audits as defined in AYGMs ESMS. The Contractor will make all the necessary arrangements for proper communication during these site visits and will accompany PIU EHSS personnel, when required.

8.9 TEAM DEVELOPMENT

- 8.9.1. At various points during the Project, formal team development exercises may be held. The participation of the Contractor and all sub-contractors will be mandatory. These sessions will be planned and scheduled to minimise the impact on subcontracted work.

8.10 PROGRESS REPORTING

- 8.10.1. The Contractor and their sub-contractors will be aware of the overall progress of the Project. This includes the progress of each sub-contractor. The Contractor will report progress to the Supervision Contract Manager on a weekly basis in a format that will be agreed with AYG M PIU. The Contractor will also be required to provide EHSS updates for inclusion in the monthly Project Progress Report prepared by the Supervision Consultant, and approved by the PIU, for the Project Lenders.
- 8.10.2. The Contractor will prepare and deliver a Project Execution Plan before the commencement of the works, in which all aspects of the Project will be explained, including the management of EHSS aspects. This plan will present the monitoring reporting structure, and content, as weekly and monthly, which will be approved by PIU.

WEEKLY PROGRESS REPORTING

- 8.10.3. Contractors will prepare and deliver to the Supervision Consultant a weekly progress report for which an open Work Authorisation Form exists. The report will identify:
- Authorised work that was scheduled to be performed during the week.
 - Progress made against that authorised work presented as:
 - A written description of progress;
 - A list of internal milestones reached;
 - An assessment of the time (in hours) remaining to complete the activities (Estimate to Complete);
 - A list of unplanned, but authorized work that was conducted, identifying the number of hours spent;
 - Authorized work that is scheduled to be performed during the next week, including any internal milestones expected to be reached; and
 - A brief description of any problems encountered in performing the activities or warnings of schedule slippage.
 - EHSS update including any concerns with stakeholders, high risk near misses etc.
- 8.10.4. The weekly progress reports will be reviewed by the Contractor and PIU and updated to reflect the progress.
- 8.10.5. Variance reports will be provided to Cost Account Managers should the variance exceed the acceptable thresholds defined in the Standard Procedures and Documents.

MONTHLY PROGRESS REPORTING

- 8.10.6. Once a month, the Supervision Consultant will prepare a Project Progress Report, approved by the PIU, for submission to the Project Lenders. This report will present the progress of project elements, expressed as a percentage complete, and an indication of whether the work is ahead of or behind schedule.
- 8.10.7. This will provide clear visibility into the work that the Contractor is doing, which is crucial to reduce the risk of inappropriate work being done resulting in unplanned, costly rework. This visibility will be established at regular periodic intervals and at key project milestones.
- 8.10.8. The Contractor will also be required to provide weekly information in EHSS performance to the Supervision Consultant. They will also need to provide the information specified in the **ESMP**, that

they will have elaborated to prepare the CESMP. The information will be included in the monthly report produced by the Supervision Consultant and will be reviewed by the PIU.

EHSS REPORTING AND SUPERVISION

- 8.10.9. The Contractor will be required to monitor and maintain records on EHSS performance, as set out in the **ESMP**.
- 8.10.10. The Contractors will prepare and deliver weekly progress reports on EHSS performance to the Supervision Contract Manager.
- 8.10.11. The reported EHSS information will include, but not be limited to, the following:
- Safety hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and corrective, remedial and preventive activities that have been undertaken;
 - Environmental incidents and near misses and investigation findings;
 - Health and Safety incidents involving injury and accidents involving fatality;
 - EHSS requirements (non-compliance incidents with permits and national law (legal non-compliance), project commitments, or other health, safety, social and environmental requirements);
 - Details of any EHSS inspections and audits by Contractor, engineer, or others, including authorities (to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken.);
 - Personnel (number of workers, indication of origin (expatriate, local, non-local nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management));
 - EHSS staffing (new hires and departures and listing of current staff and titles);
 - Training, including any toolbox talks, on EHSS issues (including dates, number of trainees, and topics covered);
 - Footprint management, details of any work outside the expropriation boundary or major off-site impacts caused by ongoing construction (to include date, location, impacts, and actions taken);
 - External stakeholder engagement (any formal or informal meetings, and information disclosure and dissemination include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups);
 - Details of any security risks;
 - Worker grievances (details including occurrence date; grievance; and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken);
 - External stakeholder grievances (details including occurrence date; grievance; and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken), grievance data should be gender disaggregated. Particular sensitivity may be needed around SEA or GBVH issues raised;
 - Major changes to the CESMP, sub-plans or other EHSS practices;
 - Project changes and EHSS implications as per the Management of Change process in the ESMP;
 - Deficiency and performance management (actions taken in response to previous notices of deficiency or observations regarding EHSS performance and/or plans for actions to be taken, these should continue to be reported until AYGM determines the issue is resolved satisfactorily.)
 - Performance against KPIs;
 - A textual description of progress; and

- A list of internal milestones attained.

- 8.10.12. The weekly reports will be reviewed by the Supervision Consultant and the PIU.
- 8.10.13. The timely reporting of EHSS performance and results will enable identification of opportunities for improvement, prevent poor performance issues, and will assist Contractor if remedial action is to be taken.
- 8.10.14. In the case of certain EHSS incidents, the PIU should be informed immediately these instances should be agreed and understood by the Contractor and sub-contractors.
- 8.10.15. In the event of non-compliance with EHSS requirements, additional visits to the site or communication with Contractor shall be undertaken as necessary, in addition to issuance of notices of deficiency or warnings to the Contractor.
- 8.10.16. The Supervising Consultant (on behalf of the PIU) will conduct periodic supervision of the Contractor's EHSS performance, including weekly site visits, as a minimum with more frequent visits during activities with high EHSS risks of potential for significant EHSS impacts. These supervisions will cover compliance with above mentioned EHSS requirements, recommendations, and the progress made with ongoing corrective actions.
- 8.10.17. AYGM will include requirements in the contract(s) for the Contractor to report on EHSS performance and issues as detailed in Chapter 6.
- 8.10.18. AYGM will inform the Lenders in the timeframes specified in the financing agreements 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 (labour, health and safety, or security incident, accident or circumstance). Such events can include strikes or other labour protests, serious worker injuries or fatalities, project-caused injuries to community members or property damage. AYGM will prepare a report on the event and the corrective action and submit to the Lenders within the specified timeframes in the loan agreement.

8.11 PROGRESS REVIEWS

- 8.11.1. On an as-needed basis, AYGM may request an informal review of Contractor's progress. This will involve discussions with the Contractor's Project Manager or the Contractor's/Sub-contractor's point of contact for contractual matters. These reviews will be held at the request of the PIU Manager. They will only be requested if cost or schedule variance exceeds the threshold identified in the Project Standards and Procedures documentation.

8.12 CONTRACTOR ISSUES MEETINGS

- 8.12.1. Every two weeks, the Supervision Consultant, or their appropriate deputy, will meet with delegates of the Contractor to discuss issues of concern to either party. The Contractor's delegate shall be a senior or intermediate employee of the Contractor, who is not directly involved in the delivery of the Project products or services.

8.13 MILESTONE REVIEWS

- 8.13.1. At key contractual milestones, a formal review will be conducted to provide visibility into the direction of the Project to all parties. Topics covered depend on the milestone, but could include such items as:

- Where the Project is in the overall Project schedule;
- An overview presentation of the key points contained in the Project deliverables that comprise that milestone;
- A briefing on the quality of work achieved to date;
- A briefing on the budget and schedule status with major variances clearly highlighted and plans for corrective action presented; and
- A briefing on the current configuration status (baseline status, status of approved baseline change requests, etc.).

8.14 NON-COMPLIANCE

- 8.14.1. At any stage of construction or other work, if the Contractor has not taken appropriate action to achieve compliance with health, safety, social and environmental requirements after repeated notices of violation and warnings of non-compliance, and significant EHSS impacts are occurring or imminent, AYGM shall order the Contractor to stop work until EHSS performance is brought under control and up to acceptable standards.

8.15 DEMOBILISATION AND SITE HANDOVER

- 8.15.1. AYGM's Environmental Supervisor, Health and Safety Specialist and Social Specialist shall inspect all work sites and other areas affected by the Contractor, when notified that construction is complete, to determine if the requirements established in the contract have been met. AYGM will allow Contractors to demobilise equipment and personnel only after AYGM personnel determine that the EHSS requirements have been fully met. Handovers will be phased on complex sites and when work is completed early. Issues that have arisen during the contract should be reviewed carefully during the handover review and acceptance by the AYGM, including the possibility of the issues arising in the future.
- 8.15.2. To ensure that all the necessary EHSS provisions have been duly met and that the appropriate controls and requirements were implemented, AYGM will develop a checklist including all relevant EHSS aspects that need to be verified upon completion of work. If there are pending topics or requirements, these will be communicated to the Contractor, who must address them in accordance with an agreed schedule.
- 8.15.3. Required policies, procedures, and guidelines for operations should include lessons learned from construction, as well as **ESAP** and **ESMP** commitments.

8.16 GRIEVANCE MECHANISM

- 8.16.1. AYGM will implement a project-level Grievance Mechanism (GM) to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. A full description of the existing grievance mechanism and the grievance mechanism process for the Project for the affected stakeholders and communities, as per PR10: Information disclosure and stakeholder engagement requirements, is provided in Chapter 6: Grievance Mechanism of the **SEP**.

CONTRACTORS ROLE IN THE PROJECT GRIEVANCE MECHANISM

- 8.16.2. The Contractor and their sub-contractors will contribute to the project-level Grievance Mechanism. The Contractor's Social Lead will be responsible for implementing the Contractor's inputs to the Project Grievance Mechanism, with support from the Contractor's CLOs. All public complaints that arise will be logged within AYGM's grievance database by the Contractor's Social Lead. The

Contractor's Social Lead and CLOs will follow the Grievance Mechanism established to record and resolve all complaints from the local community and follow up on the corrective actions taken.

- 8.16.3. Contact information will be provided via Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances. This will include contact information for the Contractors CLOs.
- 8.16.4. The Contractors CLOs will be responsible for engaging with the local community on behalf of the Contractor through meetings and distributing information. It is expected that CLOs would be responsible for notifying affected people of particular construction activities taking place, such as activities that generate high levels of noise or vibration, (e.g. blasting / tunnelling) or disruption to traffic, as well as distributing grievance forms (Appendix B in the **SEP**).
- 8.16.5. The Contractor CLOs will be managed by the Social Lead and will be responsible for implementing the key steps as follows:
 - A Public Grievance Mechanism Paper Form (Appendix B in the **SEP**) will be disclosed at the Project sites, and with the affected Mukhtars.
 - All grievances (whether submitted through a grievance form, email, telephone, etc) will be recorded on a grievance log sheet (Appendix D in the **SEP**) by the CLOs.
 - Actions to resolve the complaint need to be defined, agreed and assigned to responsible parties. Assigning of complaints received from the local community by the Contractor to AYGM shall be agreed. It should be noted that more often than not the CLOs cannot resolve the issue and it will be the responsibility of other departments including construction, health and safety etc.
 - All grievances received through direct phone calls, e-mails and face-to-face meetings and/ or communications will be registered in the central database. The CLOs will contact the complainant within 2 working days following the complaint registration to explain the Project response process for the grievance. If the grievance is not well understood, or if additional information is required, clarification will be sought from the complainant by the CLOs during this step.
 - The CLOs will prepare a grievance resolution form (Appendix C in the **SEP**) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. The grievance resolution form will be submitted within 20 days of receiving the grievance. The CLOs have 10 working days to investigate and respond to the complaint. If the case requires a more complex investigation, updated information is provided to the complainant explaining the actions required to resolve grievance, and the likely timeline.
 - Upon AYGM management approval, the outcomes of the grievance resolution form will be communicated to the complainant by the CLOs in accordance with the preferred method of communication specified. The grievance resolution form must be signed-off by the CLOs and the complainant.
 - In the case the grievance resolution form identifies proposed actions to be implemented; the CLOs will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form.
 - Upon resolving the grievance, a grievance closeout form will be prepared to be signed off by the CLOs and the complainant that will detail the solution that was implemented to resolve the grievance.
 - The CLOs will ensure that the grievance forms, grievance log sheet, grievance resolution form and grievance closeout form are always updated and maintained within the database.

- The CLOs will ensure that a supply of the grievance forms are maintained onsite (i.e. Mukhtar offices, construction workers' accommodation, construction).
- The grievance mechanism allows submission of anonymous and gender-based violence and harassment (GBVH) complaints by community members. In case of receiving GBVH complaints, an allocated Gender Focal Point will address and raise the issue with AYGM management, and the case can be referred to a relevant service provider (i.e. authorities) in severe cases.
- The CLOs aim to solve each complaint within 10 working days, however, for more complex investigations this can take up to 30 working days if the complainants is not satisfied with the response on their complaint they may apply to court.

8.16.6. PIU, supervision consultant and Contractor social team representatives shall hold weekly grievance review meetings to review new grievances, agree on assigning responsibility to resolve and monitor closure of existing grievances

8.16.7. The Supervision Consultant CLOs will monitor the Contractors' recording and resolution of grievances, and report these to AYGM in their monthly progress reports.

WORKFORCE GRIEVANCE MECHANISM

8.16.8. The Contractor will be responsible for their own workforce grievance mechanism process. The Contractor's Social Lead and Human Resources Lead will be responsible for addressing and managing grievances raised by workers and regularly communicating these to AYGM. The Contractors labour management records will include records relating to workforce grievances received and their resolution.

8.16.9. The workers' grievance mechanism will include:

- A procedure to receive grievances via a Workers Grievance Form (see Appendix C of this **CMP**), via grievance boxes, an email address, and telephone hotline.
- A Grievance Log to record and track the timely resolution of grievances. The Grievance Log will be held within the integrated database for recording all grievances from both the Project-level GM and the workers' GM. AYGM will have overall responsibility for the database, with both the Contractor and the PIU having access to input grievances into it;
- A procedure to report anonymous grievances, and those related to harassment in the workplace, including gender-based violence or harassment.
- The Contractor's Social Lead and CLOs will be responsible for receiving and recording grievances received from the workforce;
- The Human Resources Lead will be responsible for tracking the resolution of workers' grievances and will have 10 working days to investigate and respond to the complaint. If the case requires a more complex investigation, updated information will be provided to the complainant explaining the actions required to resolve grievance, and the likely timeline, where applicable.
- Upon the Contractor PMs approval, the outcomes of the grievance resolution form will be communicated to the complainant by the Human Resources Lead in accordance with the preferred method of communication specified.
- Upon resolving the grievance, a grievance closeout form will be prepared to be signed off by the Human Resources Lead and the complainant that will detail the solution that was implemented to resolve the grievance.
- The grievance resolution form must be signed-off by the Human Resources Lead and the complainant, unless the complaint is anonymous.

- The CLOs will ensure that the workers grievance forms, grievance log sheet, grievance resolution form and grievance closeout form are always updated, and that a supply of workers grievance forms is maintained onsite (i.e. construction workers' accommodation, construction compounds etc).

8.16.10. The workers' grievance mechanism will be described in staff induction trainings, which will be provided to all construction workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally, as far as practical, as other grievances whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.

8.16.11. Information about the existence of the grievance mechanism will be readily available to all construction workers (direct and contracted) through notice boards, the presence of "grievance boxes", and other means as needed.

8.16.12. The workers grievance mechanism will be established by the Contractor at the beginning of the Project implementation and will be maintained until the end of construction.

8.16.13. The Project workers' grievance mechanism will not prevent workers to use conciliation procedure (Law on Labour Courts, numbered 7036 published in the Official Gazette dated 25.10.2017- Article 3) provided in Turkish Labour Legislation.

8.17 CONSTRUCTION WORKERS ACCOMMODATION

8.17.1. The Contractor will be responsible for the development and implementation of a Construction Worker's Accommodation Management Plan as set out in the **ESMP**. This will be informed by the completion of a Construction Workers' Accommodation Checklist, as set out in Appendix B of this **CMP**.

8.18 HEALTH, SAFETY AND SECURITY PLAN

8.18.1. The Contractor will be responsible for the development and implementation of a Health, Safety and Security Plan (including occupational health and safety (OHS) as set out in the **ESMP**. This plan will define roles and responsibilities for OHS and details of how the Contractor will manage OHS practices during the construction phase of the project.

8.19 CODE OF CONDUCT

8.19.1. The Contractor will develop and implement a Construction Workers' Code of Conduct (provided in Appendix A). The contractor will also submit the Code of Conduct to the Supervision Consultant for review and approval. The Code of Conduct will reflect AYGMs core values and overall working culture, including the prohibition of any type of harassment.

9 TRAINING

- 9.1.1. AYGM will provide sufficient training to all Project personnel and ensure that the Contractors' are also providing the same level of training to their own personnel and their sub-contractors (as appropriate for the scope of their work). The Contractor will ensure that all personnel working on the Project are adequately trained. The EHSS training requirements are set out in the Training Plan of the **ESMP**, and will include;
- **Construction site inductions** for all new starters on site to explain safety rules and controls in place on site, hazards that workers might be exposed to, and how to work safely on site.
 - **Toolbox talks** covering a single EHSS aspect applicable to the Project, or stage of construction, via a brief presentation.
 - **Refresher training** delivered periodically, or as required, to ensure all workers are up to date on best site practices.
- 9.1.2. The training subjects will cover relevant aspects of this **CMP**, the **ESMP**, **BMP**, **RAP**, **SEP** and **ERF**. They will also cover compliance with legislative requirements and international standards, identification of potentially problematic areas and general awareness raising subjects.
- 9.1.3. All Contractor and sub-contractor employees shall be made aware of the workforce grievance mechanism and how to access it. They will also be made aware of the need to refer grievances from other external stakeholders, including local communities, to the Contractor's CLOs to report and respond to in accordance with the project-level Grievance Mechanism.
- 9.1.4. Security Contractors shall be given training on the implementation of the Voluntary Principles for Security and Human Rights. Detailed training on the Project approach to community engagement and the Project-level grievance mechanism will also be provided, as complaints may be brought to their attention in the first instance.
- 9.1.5. The Contractor and sub-contractors will develop and implement sexual exploitation and abuse (SEA) and gender-based violence and harassment (GBVH) awareness training for staff at all levels, from contract management to day laborers.
- 9.1.6. Additional training will be provided for staff who will be responsible for implementing, monitoring, and reporting EHSS performance. Once the general EHSS induction is defined, a series of specific trainings may be required in order to ensure that the requirements, controls, and mitigation measures are well communicated and understood.

10 APPROVING INVOICES FOR PAYMENT

10.1 REVIEW OF CONTRACTOR INVOICES

- 10.1.1. The PIUs EHSS team will be part of the process for signing off on all payments to Contractors, even if the payment is not for work that is explicitly related to EHSS mitigation and performance.
- 10.1.2. If the Contractor does not take timely action to reach compliance with EHSS requirements, the PIU Manager should continue to take appropriate action to encourage compliance, in accordance with the measures set out in the contract.
- 10.1.3. If significant impacts are occurring or imminent, the PIU Manager will notify the Contractor of the measures that will be taken to ensure the Contractor undertakes rapid action to avoid, or rectify the impact, as set out in the contract.

11 SUMMARY

- 11.1.1. This **CMP** is a live document and as such the responsibilities, procedures and compliance actions shall be updated as required (e.g. after a change in related legislation, completion of the procurement process).
- 11.1.2. It is the responsibility of the PIU and the Contractor to be fully aware of the contents, of this **CMP** and to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this **CMP**.
- 11.1.3. The Contractor will also be responsible for day to day implementation of this **CMP** for sub-contractors and suppliers and ensuring compliance with the Project EHSS requirements set out in Chapter 3 of this document.
- 11.1.4. The Contractor will also need to ensure any sub-contractors also align their own health, safety, environmental and social policies and procedures with the Project EHSS requirements.

Appendix A

CONSTRUCTION WORKERS' CODE
OF CONDUCT





CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

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 gender-based violence.

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, labourers 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 sub-contractor 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.

A copy of the code shall be displayed in a location easily accessible to the community and Project affected people. It shall be provided in languages comprehensible to the local community, Contractor's Personnel, Employer's Personnel, and affected persons.

This Code of Conduct identifies the behaviour that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation. The Contractor's Personnel will not include anyone under the age of 18 years.

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, rules, and regulations, including the Environmental, Health and Safety, and Social requirements, set out in the Contractor Management Plan.
3. Protect the health, safety and well-being of other Contractor's Personnel (including occupational health and safety, and the duty to report conditions or practices that pose a safety hazard or threaten the environment), the Employer's Personnel, and the local community (including vulnerable and disadvantaged groups);
4. 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.
5. 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 serious danger to his/her life or health;
6. Carry out his/her duties free of the effects of drugs or alcohol. Drugs and/or alcohol should not be consumed by workers while on duty or on works premises, drugs or alcohol should not be stored in personal areas such as lockers or vehicles, and workers should not attempt to sell or give drugs to any other workers on works premises;
7. Not undertake any hunting or poaching of sensitive fauna;



8. Treat other people with respect, and not discriminate when dealing with the local community on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status;
9. Not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
10. 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.;
11. Not engage in rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;
12. Not engage in sexual assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
13. Complete relevant training courses that will be provided related to the health and safety, environmental and social aspects of the Contract, including on sexual exploitation and assault (SEA) and gender-based violence or harassment;
14. Ensure the protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior, towards children, limiting interactions with children, and ensuring their safety in project areas). The term “child” / “children” means any person(s) under the age of 18 years;
15. Avoid of conflicts of interest (to ensure that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection)
16. Make use of specified sanitary facilities provided, and not use open areas;
17. Respect reasonable work instructions (including regarding environmental and social norms);
18. Ensure the protection and proper use of property to prohibit theft, carelessness of waste;
19. Report violations of this Code of Conduct; and
20. 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 Project Grievance Mechanism.

RAISING CONCERNS

If any person observes behaviour 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. This can be done in either of the following ways:

1. 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 at this address [] or by telephone at [] or in person at []; or
2. Call [] to reach the Contractor's hotline (*if any*) and leave a message.

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 behaviour 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 and possible referral to legal authorities.

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): _____

Appendix B

CONSTRUCTION WORKERS' ACCOMMODATION CHECKLIST



General regulatory framework	Y	N	N/A	Comments
Are mandatory provisions on workers' accommodation identified?				

Assessing the need for workers' accommodation	Y	N	N/A	Comments

Availability of Workforce

Has there been an assessment of workers' availability in the neighbouring communities?				
Has there been an assessment of the skills and competencies of the local workforce and how do those skills and competencies fit the project's need?				
Has there been an assessment of the possibility of training a local workforce in order to fulfil the project's needs?				

Availability of Housing

Has there been a comprehensive assessment of the different type of housing available in the surrounding communities prior to building any workers' accommodation?				
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Assessing impacts of workers' accommodation on communities	Y	N	N/A	Comments
Has a community impact assessment been carried out as part of the Environmental and Social Assessment of the overall				

Has a community impact assessment been carried out as part of the Environmental and Social Assessment of the overall				
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Assessing impacts of workers' accommodation on communities	Y	N	N/A	Comments
project with a view to mitigate the negative impacts of the workers' accommodation on the surrounding communities and to enhance the positive ones?				
Have the potential health and safety impacts and consequences of land acquisition and involuntary resettlement occurring during the construction phase of the workers' accommodation been included in the assessment?				
Have the impacts of workers' accommodation on community infrastructures, services and facilities been included in the assessment?				
Have the impacts on local community's businesses and local employment been included in the assessment?				
Have general impacts of workers' accommodation on communities' health, (notably the increased risk of road accidents and of communicable diseases), and community social cohesion been included in the assessment?				

Types of workers' accommodation	Y	N	N/A	Comments
Has consideration been given to provision of family accommodation?				
Are individual accommodations comprising bedrooms, sanitary and cooking facilities provided				

as part of the family accommodation?				
Are adequate nursery/school facilities provided?				
Is special attention paid to providing adequate safety for children?				

Standards for workers' accommodation	Y	N	N/A	Comments
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National/local standards

Have the relevant national/local regulations been identified and implemented?				
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General Living Facilities

Is the location of the facilities designed to avoid flooding or other natural hazards?				
--	--	--	--	--

Are the living facilities located within a reasonable distance from the worksite?				
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Is transport provided to worksite safe and free?				
--	--	--	--	--

Are the living facilities built using adequate materials, kept in good repair and kept clean and free from rubbish and other refuse?				
--	--	--	--	--

Drainage

Is the site adequately drained?				
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Heating, air conditioning, ventilation and light

Depending on climate are living facilities provided with adequate heating, ventilation, air conditioning and light				
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Standards for workers' accommodation	Y	N	N/A	Comments
systems including emergency lighting?				
Water				
Do workers have easy access to a supply of clean/potable water in adequate quantities?				
Does the quality of the water comply with national/local requirements or WHO standards?				
Are tanks used for the storage of drinking water constructed and covered to prevent water stored therein from becoming polluted or contaminated?				
Is the quality of the drinking water regularly monitored?				
Wastewater and solid waste				
Are wastewater, sewage, food and any other waste materials adequately discharged in compliance with local or World Bank standards and without causing any significant impacts on camp residents, the environment or surrounding communities?				
Are specific containers for rubbish collection provided and emptied on a regular basis?				
Are pest extermination, vector control and disinfection undertaken throughout the living facilities?				
Rooms/dormitories facilities				
Are the rooms/dormitories kept in good condition?				

Standards for workers' accommodation	Y	N	N/A	Comments
Are the rooms/dormitories aired and cleaned at regular intervals?				
Are the rooms/dormitories built with easily cleanable flooring material?				
Are the rooms/dormitories and sanitary facilities located in the same buildings?				
Are residents provided with enough space?				
Is the ceiling height high enough?				
Is the number of workers sharing the same room/dormitory minimised?				
Are the doors and windows lockable and provided with mosquito screens when necessary?				
Are mobile partitions or curtains provided?				
Is suitable furniture such as table, chair, mirror, bedside light provided for every worker?				
Are separate sleeping areas provided for men and women?				
Bed arrangements and storage facilities				
Is there a separate bed provided for every worker?				
Is the practice of "hot-bedding" prohibited?				
Is there a minimum space of 1 metre between beds?				
Is the use of double deck bunks minimised?				

Standards for workers' accommodation	Y	N	N/A	Comments
When double deck bunks are in use, is there enough clear space between the lower and upper bunk of the bed?				
Are triple deck bunks prohibited?				
Are workers provided with comfortable mattresses, pillows and clean bed linens?				
Are the bed linen washed frequently and applied with adequate repellents and disinfectants (where conditions warrant)?				
Are adequate facilities for the storage of personal belongings provided?				
Are there separate storages for work clothes and PPE and depending on condition, drying/airing areas?				
Sanitary and toilet facilities				
Are sanitary and toilet facilities constructed from materials that are easily cleanable?				
Are sanitary and toilet facilities cleaned frequently and kept in working condition?				
Are toilets, showers/bathrooms and other sanitary facilities designed to provide workers with adequate privacy including ceiling to floor partitions and lockable doors?				
Are separate sanitary and toilet facilities provided for men and women?				

Standards for workers' accommodation	Y	N	N/A	Comments
Toilet facilities				
Is there an adequate number of toilets and urinals?				
Are toilet facilities conveniently located and easily accessible?				
Showers/bathrooms and other sanitary facilities				
Is the shower flooring made of anti-slip hard washable materials?				
Is there an adequate number of hand wash basins and showers/bathrooms facilities provided?				
Are the sanitary facilities conveniently located?				
Are shower facilities provided with an adequate supply of cold and hot running water?				
Canteen, cooking and laundry facilities				
Are workers provided with enough space in the canteen?				
Are canteens adequately furnished?				
Are kitchens provided with the facilities to maintain adequate personal hygiene?				
Are places for food preparation adequately ventilated and equipped?				
Are kitchen floor, ceiling and wall surfaces adjacent to or above food preparation and cooking areas built in non-absorbent, durable, non-toxic, easily cleanable materials?				

Standards for workers' accommodation	Y	N	N/A	Comments
Are wall surfaces adjacent to cooking areas made of fire-resistant materials and food preparation tables equipped with a smooth, durable, non-corrosive, non-toxic, washable surface?				
Are adequate facilities for cleaning, disinfecting and storage of cooking utensils and equipment provided?				
Are there adequate sealable containers to deposit food waste and other refuse? Is refuse frequently removed from the kitchen to avoid accumulation?				
Standards for nutrition and food safety				
Is there a special sanitary process such as the WHO "5 keys to safer food" implemented in relation to food safety?				
Does the food provided contain appropriate nutritional value?				
Does the food provided take into account workers' religious/cultural backgrounds?				
Medical facilities				
Are first aid kits provided in adequate numbers?				
Are first-aid kits adequately stocked?				
Is there an adequate number of staff/workers trained to provide first aid?				
Are there any other medical facilities/services provided on site? If not, why?				

Standards for workers' accommodation	Y	N	N/A	Comments
Leisure, social and telecommunications facilities				
Are basic social collective spaces and adequate recreational areas provided to workers?				
Are workers provided with dedicated places for religious observance?				
Can workers access a telephone at an affordable/public price?				
Are workers provided with access to internet facilities?				

Managing workers' accommodation	Y	N	N/A	Comments
Management and staff				
Are there carefully designed worker camp management plans and policies especially in the field of health and safety (including emergency responses), security, workers' rights and relationships with the communities?				
Where contractors are used, have they clear contractual management responsibilities and duty to report?				
Does the person appointed to manage the accommodation have the required background, competency and experience to conduct his mission and is he/she provided with the adequate responsibility and authority to do so?				
Is there enough staff to ensure the adequate implementation of housing standards (cleaning, cooking and security in particular)?				

Managing workers' accommodation	Y	N	N/A	Comments
Are staff members recruited from surrounding communities?				
Have the staff received basic health and safety training?				
Are the persons in charge of the kitchen particularly trained in nutrition and food handling and adequately supervised?				
Charging fees for accommodation and services				
Are the renting arrangements fair and transparent?				
Are workers provided with adequate information about payment made?				
Where appropriate, are renting arrangements and regulations clearly included in workers' employment contracts?				
Are food and other services provided for free or reasonably priced, that is, not above the local market price?				
Is the payment in kind for accommodation and services prohibited?				
Health and safety on site				
Have health and safety management plans including electrical, mechanical, structural and food safety been designed and implemented?				
Has the accommodation manager a duty to report to the health authority specific diseases, food poisoning or casualties?				
Is there an adequate number of staff/workers trained in providing first aid?				
Has a specific and adequate fire safety management plan been designed and implemented?				

Managing workers' accommodation	Y	N	N/A	Comments
Is guidance on alcohol, drug and HIV/AIDS and other health risk-related activities provided to workers?				
Are contraception measures (condoms in particular) and mosquito nets (where relevant) provided to workers?				
Do workers have an easy access to medical facilities and medical staff, including female doctors/nurses where appropriate?				
Have emergency plans on health and fire safety been prepared?				
Security on workers' accommodation				
Has a security plan including clear measures to protect workers against theft and attack been designed and implemented?				
Has a security plan including clear provisions on the use of force been designed and implemented?				
Have the backgrounds of security staff been checked for previous crimes or abuses?				
Has the recruitment of security staff from both genders been considered? Have security staff received clear instruction about their duty and responsibility?				
Have security staff been adequately trained in dealing with domestic violence and the use of force?				
Are body searches only performed in exceptional circumstances by specifically trained security staff of both genders?				
Do security staff have a good understanding about the importance of respecting workers' rights and the rights of the surrounding				

Managing workers' accommodation	Y	N	N/A	Comments
communities and adopt appropriate conduct?				
Do workers and communities have specific means to raise concerns about security arrangements and staff?				
Workers' rights, rules and regulations on workers' accommodation				
Are limitations on workers' freedom of movement limited and justified?				
Is an adequate transport system to the surrounding communities provided?				
Is the practice of withholding workers' ID papers prohibited?				
Is freedom of association expressly respected?				
Are workers' religious, cultural and social backgrounds respected?				
Are workers made aware of their rights and obligations and provided with a copy of the accommodations' internal rules, procedures and sanction mechanisms in a language or through a media they understand?				
Are house regulations non-discriminatory, fair and reasonable?				
Are regulations on alcohol, tobacco and third parties' access to the camp clear and communicated to workers?				
Is a fair and non-discriminatory procedure to implement disciplinary procedures, including the right for workers to defend themselves, set up?				
Consultation and grievance mechanisms				
Have mechanisms for workers' consultation been designed and implemented?				

Managing workers' accommodation	Y	N	N/A	Comments
Are workers provided with processes and mechanisms to articulate their grievances in accordance with PS2/PR2?				
Have workers subjected to disciplinary proceedings arising from conduct in the accommodation had access to a fair and transparent hearing with the possibility to appeal the decision?				
Are there fair conflict resolution mechanisms in place?				
In cases where serious offences occur, are there mechanisms to ensure full cooperation with police authorities?				
Management of community relations				
Have community relation management plans addressing issues around community development, community needs, community health and safety and community social and cultural cohesion been designed and implemented?				
Do community relation management plans include the setting up of liaison mechanisms to allow a constant exchange of information and consultation of the surrounding communities?				
Is there a senior manager in charge of implementing the community relation management plan?				
Is there a senior manager in charge of liaising with the surrounding communities?				
Are the impacts generated by workers' accommodation periodically reviewed, mitigated or enhanced?				
Are community representatives provided with easy means to voice their opinions and lodge complaints?				



Managing workers' accommodation	Y	N	N/A	Comments
Is there a transparent and efficient process for dealing with community grievances, in accordance with PS1/PR10?				

Appendix C

WORKERS GRIEVANCE FORM





EMPLOYEE GRIEVANCE FORM

It is the purpose of the Grievance Mechanism to establish a method whereby grievances of employees will be resolved fairly and effectively. The filing of a grievance will in no way prejudice the status of the employee.

Grievances can be raised anonymously, or you can request not to have your identify disclosed to third parties without your consent. Please choose from the following if required.

I wish to raise my grievance anonymously	
I request not to disclose my identity without my consent	

Employee		Date	
Department		Job title	
Email		Telephone	

STATEMENT OF GRIEVANCE

(Background / activity leading to complaint, including dates, times, people involved)

REMEDY REQUESTED

PROPOSED SOLUTION



Employee signature		Date	
Human Resources Lead signature		Date	



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