

ZORLU OSMANGAZI DISTRIBUTION PROJECT
Summary Environmental and Social Action Plan
November 2021

Item	Action	Timetable
1.	Develop an overarching corporate social policy to guide the company's E&S management system.	December 31, 2021
2.	Strengthen the existing Contractor E&S Management Procedure and its implementation to ensure that the E&S performance of the contractors is managed and monitored according to the requirements of IFC's Good Practice Notes (GPN) on Managing Contractors E&S Performance	March 31, 2022
3.	a) Include contractor employees' training needs in the training matrix and identify potential risks to the third parties and associated actions that need to be taken b) Updated trainings and awareness programs will be provided to the public for contractor works.	May 31, 2022
4.	Incorporate indicators in the company's Key Performance Indicators System for monitoring and improving environmental and OHS management practices in place which will include clear targets to further reduce employee and contractor lost time injury rates, and implement related actions.	December 31, 2021
5.	Disclose the company's management-approved SEP on the company's website.	December 31, 2021
6.	Establish an authorized execution body for the implementation of SEP lead by a liaison officer that will plan activities and targets, develop information tools, support implementation and coordinate different departments, monitor and report implementations.	May 31, 2022
7.	Improve meaningful consultation and engagement: Improve reporting of feedback from engagement activities and evaluation of these at a strategic level to enhance meaningful consultation; Train and mobilize field staff with engagement responsibilities for more effective engagement and reach out to remote parts; Include awareness-raising activities and plan social programs in a more participatory way as part of the stakeholder engagement activities; Check whether all mukhtars are introduced in the prioritization system in the call center and WhatsApp group, if not update registers. Conduct checks and updates regularly after elections; and Handle the issue with operations management and hold consultations with mukhtars to resolve the issue of reading of counters in 2-3 months periods and issue of bulk bills.	March 31, 2022
8.	Develop an anti-sexual harassment policy including a clear complaint procedure for handling complaints and carrying out investigations.	May 31, 2022
9.	Commission a labor audit to assess labor practices of the company and its contractors.	May 31, 2022
10.	Revise the company's HR procedures and develop a Labor Code of Conduct based on the findings of the labor audit to ensure labor practices consistency with the requirements of EBRD PR2/ IFC PS2, ILO and local regulatory requirements.	December 31, 2022
11.	Prepare an employee handbook aligned with the labor code of conduct and distribute to all employees.	December 31, 2022
12.	Ensure that the contractor employees are represented by their designated representatives (e.g., in monthly OHS meetings, HR meetings).	December 31, 2021
13.	i) develop a corporate GBV and sexual harassment policy including senior management's mission statement, intended outcome for handling GBV and sexual harassment at the workplace and clearly identified grievance procedure allowing anonymous grievances, including handling complaints and carrying out investigations; ii) assign a person in senior management to be responsible for GBV and sexual harassment related issues and iii) establish a committee consisting of management, workers representative, union	May 31, 2022

ZORLU OSMANGAZI DISTRIBUTION PROJECT
Summary Environmental and Social Action Plan
November 2021

	representative and external parties, if possible, that will be responsible for implementation of policy requirements.	
14.	Engage with external experts to develop and implement a training program for managers and a training of trainers' program for the HR personnel to provide further trainings to all employees including contractors in order to raise awareness of GBV and sexual harassment at workplace.	May 31, 2022
15.	Ensure that contractors also have their own grievance mechanism for their employees and closely monitor the grievances of contractors in line with IFC PS2 requirements.	June 30, 2022
16.	Undertake a third-party audit of long-term contractors every two years to review labor practices according to EBRD PR2/ IFC PS2 requirements.	May 31, 2022
17.	Improve OHS management practices of the company through: - Integrating LOTO procedure to visual confirmation system procedure and SCADA system. - Revising work at height procedure for contractors and depending on the nature of the work issue daily or weekly. - Ensuring that necessary precautions are taken to reduce road accident of contractors. - Assessing severe weather conditions because of climate change (hot or flash floods) in terms of OHS risks in the risk assessments.	May 31, 2022
18.	Conduct a detailed climate change environmental and OHS (Occupational Health and Safety) risk assessment study, develop an action plan taking into account the severe weather events and make necessary arrangements.	February 28, 2022
19.	In collaboration with Ministry of Agriculture and forestry, ensure that measures are taken to prevent and control risk of forest fire which includes but not limited to: i) monitoring right-of-way vegetation according to fire risk; ii) removing blowdown and other high-hazard fuel accumulations; iii) time thinning, slashing, and other maintenance activities to avoid forest fire seasons; iv) disposal of maintenance slash by truck; v) planting and managing fire resistant species (e.g. hardwoods) within, and adjacent to, rights-of-way; and vi) clearing land to slow progress of fires and allow firefighting access.	February 28, 2022
20.	Revise the existing LAPF, get management approval and disclose the LAPF to ensure all social risks and impacts are integrated and addressed through the entitlement matrix and compensated accordingly; vulnerable groups are identified, informed and their needs are addressed; continuous engagement with affected people and timely information disclosure mechanisms are identified; proper grievance channels are established and integrated into corporate grievance mechanism; and the land acquisition process is monitored and necessary corrective actions are taken in a timely manner. The framework should also identify information disclosure requirements, i.e., leaflets, brochures and posters to be distributed during information disclosure and engagement activities/meetings. These should include at a minimum information on process, valuation, FAQs, grievance mechanism and contact details.	December 31, 2021
21.	The LAPF framework to identify information disclosure requirements, i.e., leaflets, brochures and posters to be distributed during information disclosure and engagement activities/meetings. These should include at a minimum information on the process, valuation, FAQs, grievance mechanism and contact details.	December 31, 2021
22.	Develop a biodiversity policy and procedures in alignment with EBRD PR6/ IFC PS6. As part of the procedure, a biodiversity screening approach will be developed that includes a set	-December 31, 2021

ZORLU OSMANGAZI DISTRIBUTION PROJECT
Summary Environmental and Social Action Plan
November 2021

	of high-risk biodiversity criteria (such as LPAs/KBAs) that will be used to screen the locations of all newly proposed powerline routes. The criteria will be developed with reference to habitat classifications per EBRD PR6/ IFC PS6. The procedure will include requirements to flag high-risk locations to the company's design and engineering teams so that these sites could be either avoided or mitigated, depending on the relative biodiversity risk present. The procedure will be developed to be compatible with the company's existing ESMS and technical risk review processes.	
23.	Commission an independent review and update of the already available mapping of existing infrastructure and carry out mapping of new infrastructure (planned) in line with EBRD PR6/ IFC PS6 Habitat classification. The mapping will draw on existing studies and will be complemented by additional work as needed to complete a PS6-compliant habitat assessment, by a specialist(s) with relevant expertise in the biology of species that may occur in the area.	<ul style="list-style-type: none"> - January 31, 2022 - March 31, 2022 - December 31, 2022
24.	Based on the outcome of the mapping carried out as per ESAP Item #23, the client will then develop and implement a Biodiversity Management and Monitoring Plan and Biodiversity Action Plan (BAP). These plans will cover both, existing and new infrastructure and will be updated following an adaptive management approach. In developing these plans, the client will consult with relevant stakeholders, including those that have designated KBAs and IBAs. The BMP will include the design of bird safe distribution lines (or upgrade in case of existing lines) and the mapping of high-risk segments in which to conduct fatality monitoring. A consultant with expertise in fatality monitoring will be procured to advise a local consultant to carry out such monitoring in alignment with international standards. The BAP will include the following sections: (i) scope and objectives; (ii) description of biodiversity values (status, threats, etc.); (iii) stakeholder/expert consultation; (iv) actions (as agreed with relevant stakeholders/experts); (v) monitoring and evaluation activities; (vi) timeframe, resources and responsibilities.	<ul style="list-style-type: none"> - January 31, 2022 - January 31, 2022 - July 31, 2022 - July 31, 2022 - December 31, 2022