



**Nazar Tekstil San. ve Tic.
A.Ş.**

Yarn Production Plant

**Occupational Health and
Safety Management Plan**

January 2022

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1.0 Introduction

1.1 Project Description

Nazar Textile San. ve Tic. A.Ş. (Nazar Textile) is producing 100% cotton yarn in Ring Compact Mill with a capacity of 35.000 kg per day, count range is between Ne 24/1 – Ne 60/1 both knitting and weaving torsion in Balsuyu Bulvarı No:53/1, Kılılı Mahallesi in Kahramanmaraş Province. The facility has a co-generation facility with a capacity of 4,592 MW and solar energy panels with a capacity of 2.2 MW on the roof of the facility, the energy produced in these facilities is used in yarn production. Construction activities is ongoing within the scope of the capacity increase project for the daily production of 75 000 kg yarn in addition to the existing capacity in the factory area.

BCA Group (BCA) has carried out a comprehensive review to determine the current environmental and social obligations and reviewed the existing environmental and social documents in order to assess the technical/legal risks related to the Plant and the Environmental and Social Management Plans have been prepared in accordance with Environmental Legislation, World Bank Environmental and Social Standards, IFC Performance Standards and IFC / WB Guidelines (Environment, Health and Safety General Guidelines, Environmental, Health, and Safety Guidelines for Textile Manufacturing).

1.2 Purpose and Scope

Within the scope of this study, an Occupational Health and Safety Management Plan (OHSMP) has been prepared in order to minimize the effects of the existing facility and the proposed Capacity Increase Project and to keep it at acceptable levels. The plan covers the construction and operation periods of the project.

IFC Performance Standard 2 recognizes that the workforce is a valuable asset and that good human resource management and a sound worker-management relationship based on respect for workers' rights, including freedom of association and the right to collective bargaining, are essential components of business sustainability.

Project-specific Occupational Health and Safety Management Plan, Emergency Response Plans, Risk Assessment Documents have been prepared in order to identify and manage the risks that may affect occupational health and safety arising from the Project.

OHSMP has been prepared considering the World Bank Environmental and Social Standard 2, IFC Performance Standard 2, IFC / WB Environment, Health and Safety Guidelines and relevant international criteria, as well as local legislation.

The OHSYP prepared for the proposed project specifies the measures and the details of the defined measures that will ensure the elimination or minimization of the health, safety and security risks that the employees may encounter as a direct or indirect result of the project that may occur during the construction and operation phases of the project.

Occupational Health and Safety Management Plan is valid for Nazar Textile and Contractors. Contractors are responsible for developing site procedures to meet the requirements of this plan.

1.3 Legislative Requirements

1.3.1 National Legislation

The list of legislation considered within the scope of the study is as follows, but not limited to:

- Occupational Health and Safety Law No. 6331,
- Labor Law No. 4857,
- Environmental Law No. 2872,
- Forest Law No. 6831,
- National Parks Law No. 2873,
- Environmental Impact Assessment Regulation, published in the Official Gazette dated 25.11.2014 and numbered 30025,
- Environmental Permit and License Regulation, published in the Official Gazette dated 10.09.2014 and numbered 29115;
- Regulation on Environmental Management Services, published in the Official Gazette dated 30.07.2019 and numbered 30847,
- Regulation on Control of Industrial Air Pollution, published in the Official Gazette dated 03.07.2009 and numbered 27277,
- Air Quality Assessment and Management Regulation published in the Official Gazette dated 06.06.2008 and numbered 26898,
- Regulation on the Monitoring of Greenhouse Gas Emissions published in the Official Gazette dated 17 May 2014 and numbered 29003,
- Regulation on Evaluation and Management of Environmental Noise, published in the Official Gazette dated 04.06.2010 and numbered 27601,
- Regulation on Preventing Major Industrial Accidents and Reducing Their Effects, published in the Official Gazette dated 02.03.2019 and numbered 30702,
- Regulation on Regulation Regarding Landfilling of Wastes published in the Official Gazette dated 26.03.2010 and numbered 27533,
- Exhaust Gas Emission Control Regulation, published in the Official Gazette dated 04.04.2009 and numbered 27190,
- Regulation on Decreasing the Ozone Depleting Materials, which entered into force after being published in the Official Gazette dated 07.04.2017 and numbered 30031,
- Water Pollution Control Regulation, published in the Official Gazette dated 31.12.2004 and numbered 25687,

- Waste Management Regulation, published in the Official Gazette dated 02.04.2015 and numbered 29314,
- Regulation on Control of Excavated Soil, Construction and Demolition Wastes, published in the Official Gazette dated 18.03.2004 and numbered 25406,
- Packaging Waste Control Regulation, which entered into force by being published in the Official Gazette dated 27.12.2017 and numbered 30283,
- Waste Oil Management Regulation, published in the Official Gazette dated 21.12.2019 and numbered 30985,
- Regulation on Control of Medical Wastes, which entered into force by being published in the Official Gazette dated 25.01.2017 and numbered 29959,
- Regulation on Control of Waste Batteries and Accumulators, published in the Official Gazette dated 31.08.2004 and numbered 25569,
- Regulation on Control of End-of-Life Tires, published in the Gazette dated 25.11.2006 and numbered 26357,
- Regulation on the Control of Polychlorinated Biphenyls and Polychlorinated Terphenyls, which entered into force after being published in the Repetitive Official Gazette dated 27.12.2007 and numbered 26739,
- Regulation on Control of Soil Pollution and Point Source Contaminated Sites, which entered into force by being published in the Official Gazette dated 08.06.2010 and numbered 27605,
- Regulation on Health and Safety Precautions in Working with Chemical Substances, published in the Official Gazette dated 12.08.2013 and numbered 28733,
- Occupational Health and Safety Regulation in Construction Works, published in the Official Gazette dated 05.10.2013 and numbered 28786,
- Occupational Health and Safety Risk Assessment Regulation published in the Official Gazette dated 29.12.2012 and numbered 28512.

1.3.2 International Standards

The project owner is required to assess the risks and impacts to the health and safety of workers throughout the life of the project and establish preventive and control measures consistent with good international industry practice in accordance with World Bank Environmental and Social Standard 2, IFC Performance Standard 2, IFC Environment, Health and Safety General Guidelines and IFC Environmental, Health, and Safety Guidelines for Textile Manufacturing.

The International Labor Organization (ILO), of which Turkey is a member, is the only trilateral UN agency that includes government, employer and worker representatives. The purpose of the ILO is to bring governments, employers and workers together to establish labor standards and develop policies and programs to ensure that the needs of working women and men are met. Turkish OHS Legislation is in line with the standards of the ILO conventions approved and in force by Turkey.

The United Nations Guiding Principles on Business and Human Rights were published by the UN Human Rights Council in 2011. The purpose of these principles is to guide governments, companies and other relevant stakeholders to ensure that businesses do not adversely affect human rights. Its principles are three pillars: protection, respect and compensation. The shared responsibility of respecting human rights and the right of victims to access effective reparation is the Government's duty to protect human rights. Business companies must respect human rights, avoid violating human rights and eliminate the negative human rights impacts they have made.

The responsibility to Show Respect requires a company to:

- To prevent activities that cause or contribute to human rights violations and to address the impacts of human rights violations;
- To reduce or prevent impacts directly related to its activities, products and business relationships and services.

Nazar Textile will align its activities with the UN Guiding Principles.

Occupational health and safety risks during the operation and decommissioning of the project are similar to those of most industrial facility and infrastructure projects. These risks may apply to physical, chemical, biological and work-specific hazards and emergencies.

2.0 Roles and Responsibilities

2.1 Nazar Textile

Nazar Textile is responsible for the comprehensive implementation of this plan, its transmission to the contractors, the regular inspection of the applications related to this plan and communication with the local administrations when necessary.

2.2 Contractors

All contractors assigned in the field are obliged to carry out their work in accordance with the Occupational Health and Safety Management Plan. It is responsible for notifying Nazar Textile about activities that may cause possible risks to employees or communities.

2.3 Employees

2.3.1 Project Manager

Nazar Textile Project Manager is responsible for allocating resources for the implementation of this plan, ensuring that the plan is communicated to the project team and the contractors and providing the necessary training, being in contact with the Public Relations and OHS/Environment Consultants in the field to monitor the performance, and making the necessary inspections to close the identified nonconformities.

2.3.2 Project OHS Expert

OHS experts within the scope of the project update this plan at least annually in accordance with the project needs, ensure that it is implemented by the project team and contractors, monitor and control the practices related to occupational health and safety and provide trainings, share monitoring and performance data with the Project Manager, work with contractors. OHS Expert is responsible for ensuring communication on health and safety management with contractors, implementing and monitoring corrective actions.

Nazar Textile OHS Experts have been appointed to plan training activities, to provide/give trainings and to make performance evaluations in order to protect the employees from the occupational health and safety risks arising from the project.

The Project OHS Expert, together with the OHS Committee, updates the risk assessment reports and performs internal audits to determine whether the measures have been implemented, and participates in incident investigation and reporting activities; ensures that legal authorities are informed within the framework of legal requirements; the accident/incident report procedures are followed; contributes to the implementation of measures related to environmental, health and safety objectives; and prepares statistical / performance reports. Investigates and reports all relevant incidents to the Project Manager.

2.3.3 Occupational Physician

The Occupational Physician assigned to the project contributes to the implementation of health measures related to the environment, health and safety objectives of the project. Occupational Physician carries out health training of the relevant personnel on the issues covered by this Plan; makes/has done job entry and periodic health examinations; investigates and reports all incidents related to occupational health and safety together with the OHS Expert; collaborates with the OHS Expert to develop, monitor and review this plan when necessary.

2.3.4 Employee's Representative

In accordance with the Communiqué on the Qualifications and Election Procedures and Principles of Employee's Representatives Related to Occupational Health and Safety, employee's representatives selected from among employees have the same responsibilities as general employees for their basic duties. Employee's Representative is responsible for receiving the information provided by the employees and transmitting it to the OHS Committee and Project Manager; conveys the decisions taken by the OHS Committee and/or Project management to the employees. If there is more than one employee's representative, a lead representative should be elected. It participates in the OHS Committee, conveys the opinions of the employees to the OHS Committee and the OHS Committee decisions to the employees; participates in private training made for him/her; informs his/her supervisor, OHS Expert, occupational physician or OHS Committee Members about the risks.

2.3.5 All Employees

All employees assigned in the factory are obliged to carry out their work in accordance with the Occupational Health and Safety Management Plan. They are responsible for notifying the OHS Expert of activities that may cause potential risks to other employees or communities.

3.0 Education

Nazar Textile will assign personnel with vocational training and competence within the scope of the Occupational Health and Safety Management Plan. Within the scope of this plan, training requirements will be determined annually and included in the Annual Training Plan.

Nazar Textile OHS Expert is responsible to plan training activities, give trainings and make performance evaluations.

Both managers and employees will be involved in the trainings. All employees will be informed about their roles in occupational health and safety management, and the hazards that need to be prevented and controlled.

Nazar Textile will provide the necessary budget and planning time to ensure effective OHS training. Both management and employees will be involved in the development of the program. To effectively fulfill their OHS responsibilities, all employees must understand (1) their role in the program, (2) the hazards and potential hazards that must be avoided or controlled, and (3) ways to protect themselves and others.

The training program will focus on health and safety concerns that determine the best way to deal with a particular hazard. Once a hazard is detected, it will be completely eliminated. If this is not possible, workers will be trained, if necessary, to protect themselves against remaining danger.

All Project and contractor employees are obliged to attend occupational health and safety management training and to understand the Project's approach to community health and safety management. These trainings will be conducted by the HR Unit and OHS Expert.

As a minimum, all workers will learn about the general safety and health rules of the work site, the safe work practices needed to help control specific site hazards and exposure, and the individual's role in any emergency. Nazar Textile will ensure that all employees understand the dangers they may be exposed to and how to prevent exposure to these hazards from harming themselves and others.

Employees will learn that they are responsible for complying with Nazar Textile OHS rules and that most accidents will be prevented by safe working practices. They will be very familiar with the personal protective equipment necessary for their job. They will be made to understand what to do in an emergency and will be made clear that not every employee is expected to start a new role without being properly trained. If a job seems unsafe, employees will report the situation to their supervisor.

All line managers should understand their responsibilities within the OHS Programme. The issue may be discussed periodically as part of regular management meetings. Training for unit managers will highlight the importance of managers demonstrating their commitment to the safety and health program. Unit managers are expected to set a good example by meticulously following all safety and health rules.

Special training will be provided to assist supervisors in their leadership roles. It is expected that they learn to look for hidden dangers in the work under their supervision, constantly control and maintain the physical measures in their fields and contribute to the training of their employees with consistent practices.

All supervisors will complete instructor training courses to learn training techniques and how to test employees' knowledge and skills. They will also receive training in how to implement fair and consistent recognition and discipline.

All visitors will receive general visitor OHS training prior to entering the site to recognize specific workplace hazards or potential hazards. No visitors will be allowed on the Nazar Textile site without general visitor OHS training and a trained employee / guide accompanying them.

Workers who need to use personal protective equipment (PPE) and people working in high-risk situations will need special training. Supervisors and staff will be taught the correct selection, use and maintenance of PPE. Because PPE can sometimes be unpractical, workers may need to be motivated to wear it whenever protection is needed. The training will therefore begin with a clear explanation of why the equipment is needed, how its use will benefit the user, and what its limitations are. Individual workers will be familiar with the PPE they are asked to wear. The training will consist of showing workers how to install the equipment, how to wear it properly, and how to test and maintain it for proper fit. Proper fit is essential for the equipment to provide the intended protection.

Nazar Textile will train its employees to respond to emergencies. Emergency phone numbers and who can use them in emergency training, emergency exits and how they are marked; evacuation routes; and signals that warn workers of the need for evacuation will be taught. An Emergency Response Plan has been prepared regarding the measures taken within the scope of emergency response.

4.0 Occupational Health and Safety Management and Mitigations

4.1 Occupational Health and Safety Management

Nazar Textile and the contractors will implement these plan requirements by adapting them to their own procedures.

DB ESS2 and IFC PS2 requires establishment of organizations to prevent, prepare for, and respond to emergencies, identify potential hazards to employees, particularly life-threatening hazards, take preventive and protective measures, including changing, substituting or eliminating hazardous situations or substances, training employees, documenting and reporting occupational accidents, diseases and incidents.

Within the scope of the project, Emergency Response Plan and Risk Analysis document have been prepared and the documents are revised when needed (when a new risk is determined) or every 4 years. Emergency Response Plan and Risk Analysis document has been prepared within the scope of the Occupational Health and Safety Law No. 6331, Regulation on Emergencies at Workplaces, and the plan has determined what to do in an emergency, actions to be taken, communication plan and emergency response teams.

The training needs of the employees has been determined by the OHS Committee and an Annual Training Plan has been prepared for follow-up. Employees first attend trainings at the start of employment and receive a health report stating that they can work in Dangerous Jobs. The documentation and plans of all subcontractors are checked by Nazar Textile OHS experts, joint trainings are given and field studies are constantly monitored and supervised. In addition, employment and periodic health checks of both Nazar Textile and contractor employees are followed by the Nazar Textile OHS unit.

Periodic checks, conformity checks and inspections of work equipment/machines are carried out. The control documents of the work equipment/machines used by the subcontractors are inspected by the OHS unit, and unsuitable machinery/equipment is not accepted into the field. Occupational accidents and diseases are followed up by the Occupational Physician. Occupational accidents and diseases statistics and records are kept.

The mitigation measures to be taken on occupational health and safety management during the construction and operation phases of the project are presented in Table 4-1. In the table, the subject of the impact, necessity, action to be taken, timing, monitoring activity and frequency are indicated.

Table 4-1 Mitigations-Occupational Health and Safety Management

ISSUE	MITIGATION MEASURE	REQUIREMENT	TIMING	MONITORING	MONITORING/CONTROL PERIOD
Increasing OHS awareness	<ul style="list-style-type: none"> Appropriate and adequate site safety information, training and instructions will be provided to all employees and contractors. Field visitors will be trained prior to their entry to the field and will not be allowed on site without an escort. 	WB ESS2 IFC PS2 Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees	Construction and Operation Period	Training records	Monthly
Reducing OHS risks arising from General Working Conditions	Recruitment and periodic health checks will be done/controlled by the occupational physician.	WB ESS2 IFC PS2 Regulation on Duties, Authorities, Responsibilities and Trainings of Occupational Physicians and Other Health Personnel	Construction and Operation Period	Health records	Monthly
	All occupational injuries/illnesses, accidents and near misses will be promptly reported to the OHS Expert and Project Manager and investigated.	WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation	Construction and Operation Period	Health, Near-miss and accident records	Monthly
	OHS Committee meetings will be held regularly with subcontractor representatives. Coordinated studies will be carried out to improve working conditions by taking the opinions and suggestions of the employees.	WB ESS2 IFC PS2 Regulation on Occupational Health and Safety Committees	Construction and Operation Period	OHS Committee Records	Monthly
	All operators will have appropriate professional qualifications. Persons without OHS training will not be employed.	WB ESS2 IFC PS2 Vocational Qualification Institution Vocational Qualification Certificate	Construction and Operation Period	Employment documents Professional Competence Documents	Monthly

		Communiqué on Obligatory Occupations			
	OHS risks and actions to be taken will be determined and reported by making daily field tours by OHS experts. General site layout and cleaning issues will also be checked with field tours.	WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation	Construction and Operation Period	OHS Action Plans - Reports Risk Assessment Document	Monthly
	Infrastructure plans and projects will be available in the field office. Before any excavation work, the areas where the lines are located will be marked according to the plans.	WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation	Construction and Operation Period	Infrastructure plans Risk Assessment Document	When necessary
	Studies will be carried out taking into account the distances determined in the regulations regarding overhead power lines. Employees will be reminded of the precautions to be taken regarding risks arising from electricity in case of working on or near power lines.	WB ESS2 IFC PS2 Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees	Construction and Operation Period	Training records Risk Assessment Document	Monthly
	Smoking is prohibited except in designated areas on the site. While determining the smoking areas, care was taken to keep them away from flammable and combustible chemicals.	Law on the Prevention and Control of Harms of Tobacco Products	Construction and Operation Period	Visual inspection	Daily
	It is prohibited to park vehicles outside the designated areas on the site. Unauthorized vehicles are prohibited from walking around the site.	-	Construction and Operation Period	Visual inspection	Daily
	To protect employees from risks arising from vehicles: <ul style="list-style-type: none"> Reversing alarms of construction machines and trucks will be operational. All vehicles will have a fire extinguisher and first aid kit. Unloading trucks and reverse maneuvering on construction machinery are prohibited without an observer. The speed limits determined in the field will be obeyed. When working at levels higher than four steps, guardrails or seat belts will be used. 	WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation	Construction and Operation Period	Equipment maintenance records action plans Risk Assessment Document	Monthly

	<ul style="list-style-type: none"> Employees will not stand under load during crane lifting/lowering operations. Periodically checked equipment will be used in all works and visual inspections will be made before use. Employees will always stay outside the turning radius of all heavy vehicles. Also, a spotter will always be used during the movement of the vehicle. The Lookout and others will maintain ongoing communication with the operator, as appropriate. All operators will have vocational training. Equipment used must have reversing alarms. 				
	<p>To protect employees from risks arising from hygiene:</p> <ul style="list-style-type: none"> Industrial hygiene training will be included in general OHS training for all employees. Only designated areas will be used for eating. The cafeteria and dining hall will be kept clean. The working environment (in terms of dust, noise, lighting, temperature, air flow & quality, etc.) will be adjusted according to the relevant regulations and measurements will be made according to the Regulation on Occupational Hygiene Measurement, Test and Analysis Laboratories. If necessary, actions will be determined and action plans will be created. Shower(s) will be provided for employees who may need it. 	<p>WB ESS2 IFC PS2 Regulation on Occupational Hygiene Measurement, Test and Analysis Laboratories</p>	<p>Construction and Operation Period</p>	<p>visual inspection Indoor measurement reports Risk Assessment Document action plans</p>	<p>Monthly</p>
	<p>To protect employees from risks arising from radiation:</p> <ul style="list-style-type: none"> Special working hours arrangements will be made to prevent health risks for workers in extreme conditions such as exposure to ultraviolet radiation and extreme heat, cold and humid environments. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Risk assessment document Working hour records</p>	<p>Monthly</p>
	<p>In order to protect employees from the risks arising from their work in closed, gaseous, dusty and noisy areas:</p> <ul style="list-style-type: none"> For activities carried out in closed areas, gaseous, dusty or noisy areas, working and rest periods will be determined by job-specific risk assessments and applied. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Risk assessment document Working hour records</p>	<p>Monthly</p>
<p>Reducing OHS risks caused by physical hazards</p>	<p>To protect workers from work equipment noise:</p> <ul style="list-style-type: none"> Equipment with lower sound power levels will be selected. Silencers will be installed for the fans. 	<p>WB ESS2 IFC PS2</p>	<p>Construction and Operation Period</p>	<p>Risk assessment document Indoor measurement reports</p>	<p>Biannually</p>

	<ul style="list-style-type: none"> • Appropriate silencers will be fitted to engine exhausts and compressor components. • High noise areas will be identified and marked, and personnel will always wear personal noise protection equipment when working in these areas. (areas with noise levels > 85 dB(A)) • Generators shall be designed to meet applicable occupational noise levels. • No worker shall be exposed to noise levels above 85 dB (A) for more than 8 hours a day without hearing protection. • The grievance mechanism will be used effectively. 	<p>Regulation on Protection of Employees from Risks Related to Noise</p>			
	<p>For protection of workers from work equipment vibration:</p> <ul style="list-style-type: none"> • Lower vibration tools and equipment will be selected. • Task rotation and time limiting will apply to activities with high exposure levels. • Vehicles with suspension seats or cabins will be used. • Vehicle maintenance will be done regularly. 	<p>WB ESS2 IFC PS2 Regulation on Protection of Employees from Vibration-Related Risks</p>	<p>Construction and Operation Period</p>	<p>Risk assessment document Indoor measurement reports</p>	<p>Biannually</p>
	<p>To protect employees from risks arising from electrical equipment</p> <ul style="list-style-type: none"> • All energized electrical devices and lines will be marked with warning signs. • Devices will be locked and tagged (LOTO) during service and maintenance. • Power cords and extension cords shall be protected against damage from work (suspension on the road, etc.). • Only TSE certified extension cables will be used. • No approach zones shall be created around or below the high voltage power lines. • Infrastructure plans and projects should be checked and all buried electrical cables should be marked before any excavation work. • Flexible cables shall be either protected by a suitable enclosure or barrier or located in locations protected from mechanical damage, liquid and high temperature. • Cables shall not exceed the maximum length specified in the relevant regulations. • Appropriate labeling shall be provided for service rooms containing high voltage equipment ("electrical hazard") and where access is controlled or prohibited. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Risk assessment document Accident records</p>	<p>Monthly</p>

	<ul style="list-style-type: none"> Special electrical safety training will be given to personnel working with or around exposed components of electrical circuits. This training should include, but is not limited to, basic electrical theory training, appropriate safe operating procedures, hazard awareness and identification, correct use of PPE, appropriate LOTO procedures, first aid, and appropriate rescue procedures. 				
	<p>To protect employees from risks arising from hot works (welding, cutting, grinding and post-welding etc.)</p> <ul style="list-style-type: none"> Hot work will only be done by employees with appropriate vocational training, with a special work permit. During hot work, fire protection measures (fire extinguisher, blanket, observer, etc.) will be taken. The observer will monitor the area for 30 minutes after the study is done and after two hours they will do a control check. Job-specific PPE will be used. There will be no flammable or explosive in the working area. Where practical, all combustible materials shall be transported horizontally at least 15 meters from the work area. Where displacement is impractical, combustible materials shall be protected by flameproof covers or otherwise screened. The area will not be left uncooled. The cutting and welding equipment to be used will be in safe working condition and in good condition. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Work permits Professional qualification documents Accident records Risk Assessment Document</p>	<p>Monthly</p>
	<p>Mitigation measures for the prevention and control of occupational exposure to heat during operation and maintenance of combustion units, piping and associated hot equipment are presented below:</p> <ul style="list-style-type: none"> Pressure vessels and pipes will be regularly inspected and maintained. Adequate ventilation will be provided to work areas to reduce heat and humidity. The time required to work in high-temperature environments will be reduced and access to potable water will be provided. Employees, production equipment, pipes, etc. Surfaces in close contact with hot equipment, including Appropriate warning signs and PPE, including insulated gloves and shoes, will be used near high-temperature surfaces. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Indoor measurement reports Grievance records Risk Assessment Document</p>	<p>Monthly</p>

	<p>Ergonomic conditions in the working areas will be checked with field tours and employee interviews. In particular, jobs, processes or workstations that have the potential to cause repetitive stress or repetitive strain injuries, repetitive motion injuries and musculoskeletal disorders will be identified and measures to be taken will be determined.</p>	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Monthly-weekly OHS Observation records Grievance records Risk Assessment Document</p>	<p>Monthly</p>
	<p>In order to protect employees from risks arising from working at height:</p> <ul style="list-style-type: none"> Working at height will only be performed by appropriately trained workers with a special work permit. The work permit will include a recovery plan. Fall risks will be decreased by fall prevention systems such as scaffolding, lifts, nets, etc. Personal fall prevention systems shall be used for fall protection. The actions to be taken will be determined by making a risk assessment. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Monthly-weekly OHS observation records Risk Assessment Document Work permits</p>	<p>Monthly</p>
	<p>To protect workers from risks arising from excavation works:</p> <ul style="list-style-type: none"> Excavation works will be carried out by persons with appropriate training, after risk assessment and obtaining a special work permit. The suitability of the equipment to be used in the study will be checked. Excavation material will be collected at least 1 meter away from the excavation area. If there is a live line (electricity, gas, steam, etc.) in the excavation area, it will be isolated. Slopes will be determined according to the condition of the excavated soil. For excavations deeper than 5 m, vehicle use will be prohibited around the excavation area, the slope of the excavated area will be checked by the supervisor before descending. The excavation area will be surrounded by barriers and night warning lights will be placed. Excavations deeper than 50 cm will not be made manually unless it is necessary for technical reasons. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Monthly-weekly OHS observation records Risk Assessment Document Work permits</p>	<p>Monthly</p>
	<p>To protect workers from risks arising from lifting operations:</p> <ul style="list-style-type: none"> Lifting works will be carried out by persons with appropriate training, by making a risk assessment, lifting plan and obtaining a special work permit. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Monthly-weekly OHS observation records Risk Assessment Document Work permits</p>	<p>Monthly</p>

	<ul style="list-style-type: none"> • Documents and periodic maintenance records of the lifting equipment will be checked and visual inspection will be carried out by the OHS Expert. • The operator will have appropriate training and professional qualifications and will use appropriate PPE. • Lifting equipment and vehicles will be checked by their operators before starting work. Steel ropes, chains, hooks, hangers, chain blocks and automatic stops will be checked once a year by authorized technical personnel. • Any load exceeding the lifting capacity of the crane shall not be lifted. • Before starting the lifting operation, the entire area where the load will move will be surrounded by barriers to protect working under load. • There will be no employees under the load during the lifting operations and a flagman will be assigned. • If more than one flagger is present, the operator will follow the instructions of a single flagger and this flagger will be selected before the start of the operation. • The communication method between the flagger and the operator will be determined before the operation, taking into account any malfunctions in the communication devices. • The operator shall never leave the machine while a load is suspended. • The load to be lifted will be checked before the operation and the appropriate configuration will be selected according to the load scale. • Floors unsuitable for lifting shall be surrounded and marked with barriers or other suitable means. This information will be shared with operators. • Lifting operations will be carried out within the wind limits permitted by the manufacturer. 				
<p>Reducing OHS risks caused by chemical and biological hazards</p>	<p>The air quality of the working environment will be maintained and measured according to the relevant legislation and standards, and adequate ventilation will be provided. According to risk assessments, physical, chemical and biological hazards related to air quality will be eliminated and/or reduced at source. Required PPE and training will also be decided based on risk assessments.</p>	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Indoor measurement reports Grievance records Risk Assessment Document</p>	<p>Monthly</p>

	<p>To protect employees from risks arising from fires:</p> <ul style="list-style-type: none"> • Combustible materials shall be stored away from sources of ignition and oxidizing materials. • The flammable material storage area will have natural ventilation or ventilation system, fire resistant walls, fire extinguishing devices and/or systems, and an appropriate fire detection system, away from the entrance and exit points to the buildings. • The Emergency Response Plan will include the precautions to be taken in the fire and fire training will be given to the employees. • Fire extinguishing devices and systems, fire detection systems will be maintained periodically by authorized companies. • Fire extinguishers will be placed near fire risk areas such as chemical storage and welding areas. • Only authorized personnel will be allowed to work on the electrical installation. • Personnel responsible for the management of combustible materials will be appointed and trained. The storage, transportation and use of these flammable materials will be established in accordance with national and international standards. • Fire exits and exit doors shall be placed in both temporary and permanent structures/buildings and shall be kept open at all times. • A smoking area will be determined outside the facility and a fire extinguisher will be provided for this area. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation Regulation on Fire Protection of Buildings</p>	<p>Construction and Operation Period</p>	<p>Training records Emergency Response Plan Risk Assessment Document</p>	<p>Monthly</p>
	<p>To protect employees from risks arising from dangerous substances:</p> <ul style="list-style-type: none"> • All hazardous materials will be evaluated according to relevant legal and international requirements. Storage, transportation and usage conditions will be made in accordance with the Material Safety Data Sheets. • Material Safety Data Sheets will be kept within reach of employees near chemicals, and trainings will be organized to provide information about chemicals to workers working with chemicals. • Spill kits and protective equipment will be available in areas where hazardous materials are handled to ensure the cleaning of spills/spills. • Appropriate first aid supplies and eye wash showers will be located near hazardous material storage areas. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation Regulation on Health and Safety Precautions in Working with Chemical Substances</p>	<p>Construction and Operation Period</p>	<p>Training records Emergency Response Plan Risk Assessment Document Waste records</p>	<p>Monthly</p>

	<ul style="list-style-type: none"> • Dangerous goods will be transported only by vehicles that are allowed to transport dangerous goods. • Chemicals will be stored together in accordance with the Chemical Storage Matrix. • Drummed hazardous materials will be stored in areas with impermeable surfaces and collection hoppers that are sloped to contain any spills/leaks. • Containers holding flammable and/or toxic substances will be permanently closed and covered. It will be stored in its original packaging and handled and transported under maximum security. • Any accidental fuel or oil spill will be promptly cleaned up with absorbent material and collected in sealed and labeled containers – stored in the waste storage area by contacting the Environmental Officer. 				
	<p>To protect workers from risks arising from pressurized cylinders:</p> <ul style="list-style-type: none"> • Pressurized cylinders should always be kept in a vertical position and connected. They will not be moved by hand. • Pressurized cylinders will be stored separately as full or empty according to their gaseousness. Storage areas will be away from smoking areas. 	<p>WB ESS2 IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Training records Emergency response plan Risk Assessment Document Accident records</p>	<p>Monthly</p>
	<p>To reduce exposure to biological hazards, especially during demolition, renovation, sewage, ventilation works:</p> <ul style="list-style-type: none"> • Snakes, spiders, various insects, etc. likely to be found in the environment will be visually checked. They are more likely to be found especially under large-sized stones/rocks and materials. • Employees will be constantly monitored for allergic reactions, asthma and other respiratory complaints during outdoor works. • It will be ensured that PPE in accordance with the studies is used. • Long sleeved clothes will be worn against insect bites and leggings will be used if necessary. It will be checked for any signs of sting (redness, swelling, respiratory distress, etc.). • In case of snake bite, the Occupational Physician will be informed and transfer to the nearest health institution will be provided. 	<p>IFC PS2 Occupational Health and Safety Risk Assessment Regulation</p>	<p>Construction and Operation Period</p>	<p>Training records Risk Assessment Document Grievance and accident records</p>	<p>Monthly</p>

5.0 Audits and Reporting

5.1 Audits and Monitoring

Nazar Textile will conduct regular audits in order to evaluate the performance of occupational health and safety management.

In case of an occupational health and safety risk or an event, Nazar Textile will immediately prepare the necessary action plans and renew the risk assessments. The Field Team has the responsibility to convey the occupational health and safety issues to the Nazar Textile Project Manager.

In order to control whether the contractors fulfill the requirements of the Occupational Health and Safety Management Plan, Nazar Textile OHS Expert will conduct daily and weekly field tours, monitor the reported work accidents & near misses, health, safety & safety complaints and training records of the employees monthly. In addition, the Project Manager will be informed if non-compliance is detected.

5.2 Reporting

Regular monitoring activities will be undertaken to assess the level of implementation of the mitigation measures identified for the Project for both the construction and operation phases.

Field tours and daily inspections will be conducted by OHS Expert, covering a wide range of operational aspects, including occupational health and safety issues, in accordance with the activities carried out on site.

According to the monitoring results, necessary corrective and preventive actions will be determined and necessary changes will be reflected in the Plan. The training program will be updated accordingly.

OHS audits will be internal or external. Timing and frequency of internal audits will be determined by Project management and OHS Expert. Apart from these, the Company will receive third-party audit services to expand the OHS culture and increase the effectiveness of the OHS management system.

Any non-compliance or incident detected during monitoring and audits will be reported to the Project Manager. Studies will be carried out to take and follow up the necessary actions. As a result of these evaluations, the safety measures applied in the Job-Specific Working Procedures are transformed into much more efficient and practical applications.

All occupational health and safety management procedures/instructions regarding the project, monitoring, inspection and training records, audit records, OHS Committee Records, daily and weekly field tour records, work permits, accident records and accident investigation reports, drill records, near-miss reports will be kept in the field office.

