

SOCIAL MANAGEMENT PLAN (SoMP)

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1. INTRODUCTION

The purpose of this document is to describe the procedures and the operational methods implemented by the Project in order to continuously enhance the project's social performance in accordance with Astaldi - Türkerler JV's policy and in compliance with Turkish Labour Laws ISO 26000, ILO, and Social Accountability 8000 requirements.

These rules have been prepared in the interest of ATJV employees as well as the public in conformance with the local and governmental legislations.

ATJV employees, subcontractors, suppliers/vendors and public will be cooperating in the enforcement of, and complying with the plan. The partners of the joint venture are accredited with ISO 9001 and 14001 as well as OHSAS18001.

The Social Management Plan (SoMP) covers or gives reference to the following issues:

- Contractor Management
- Communication and Grievance Procedure
- Staff Grievance Procedure
- Security Responsibilities (Site Entry Procedure)
- Code Of Conduct
- Responsible Procurement Policy

2. SCOPE

The SoMP contains the measures to be implemented in the different stages of execution of the Project, in order to promote positive outcomes and prevent or minimize the adverse impacts that may arise.

The scope of the plan covers the site activities of all the staff and operatives, subcontractors and suppliers, and visitors. It also extends to the duty of care required to ensure those members of the consultants' team, other contractors' staff and the public are in line with Astaldi-Türkerler JV 's Social Policy.

3. FUNCTION OF THE SOCIAL MANAGEMENT PLAN

The function of Social Management Plan is listed in the following items:

- To establish the Social Management Structure for the project.
- To define the responsibilities for the personnel with social management duties.
- To identify arrangements to minimize risk.

4. REFERENCE DOCUMENTS

- EN ISO 9001
- EN ISO 14001
- EN ISO 26000
- OHSAS 18001 Standard,
- Astaldi Türkerler JV Quality Health Safety Environmental Policy
- IFC PS2 and PS4 ; EBRD PR2, PR4, PR10 regulations
- Project Management Plan
- Safety Management Plan
- Administrative Specifications and annexes, Construction Works General Specifications, Contract, Protocols signed,
- National Labor Law No. 4857 and regulations, legislations, statements, ILO contracts associated with this law,
- National Health and Safety Law No. 6331 and regulations, legislations, statements, ILO contracts associated with this law,
- Other regulations legislations, statements, ILO contracts associated with this law,

| Integration Table | |
|--|---|
| EN ISO 26000 Requirement | Social Management Plan |
| Item 6.3.6 Human rights issue 4: Resolving grievances | Section 10. Suggestion and Complaints Mechanism |
| Item 5.3.3 Stakeholder Engagement | Stakeholder Engagement Plan, Component of ESIA |
| Item 6.4 Labour practices | Section 11. Health, Work, Social Area, Rights Of Workers |
| Item 6.7.1.1 Organizations and consumer issues | Responsible Procurement Policy |
| Item 4.4 Ethical behaviour | Worker Code of Conduct, Code of Ethics |

5. DEFINITIONS AND ABBREVIATIONS

PMP: Project Management Plan

SMP: Safety Management Plan

EMP: Environmental Management Plan

ESIA: Environmental and Social Impact Assessment

ESMMP: Environmental and Social Management Monitoring Plan

SEP: Stakeholder Engagement Plan

SoMP: Social Management Plan

IFC: International Finance Corporation

EBRD: European Bank for Reconstruction and Development

ILO: International Labour Organization

BOR: Yönetim Kurulu

PM: Project Manager

DPMT: Deputy Project Manager Technical

6. ORGANIZATION AND SOCIAL RESPONSIBILITIES

Organization and Social Responsibilities are explained in Job Descriptions. Public Relations Officer depends on PM and Deputy Project Manager Technical (DPMT) and his responsibilities are presented in following items:

- Works out, whenever necessary, and by PM's prior authorization, outgoing communications aimed at obtaining general consent to the works being executed and at developing and improving, in Turkey and abroad, the image and reputation of the Astaldi Türkerler Joint Venture and of the project being executed by the same, in compliance with general communication guidelines laid down by Board of Representatives (BOR)
- Project Presentation upon requests from neighboring area citizens.
- Defines, in agreement with PM, the policy governing the management of the relationships with the media at Project level and represents the exclusive reference point for all the relevant activities involving Project's departments/offices, under a constant interaction with PM, in order to ensure uniformity of language and communication identity within the Joint Venture.
- Consequently to the above, the main activities to be carried out in the various sectors in compliance with the guidelines agreed upon with PM and constantly interacting with PM itself, are the following:
- Communication

- Conceives, develops, coordinates and implements initiatives of communication and advertisement at Project level;
- Takes care of enhancing the image of the project under execution, assessing the advisability and the effectiveness of new forms of communication;
- Provides PM with assistance in connection with the production and the update of institutional communication matters referring to the Astaldi Türkerler Joint Venture 's image (brochures, presentations and the alike);
- Takes care of the management of the Project's website, by also taking advantage of the collaboration with third-party companies, ensuring the update of contents in compliance with disclosure obligations and according to web identity guidelines previously agreed upon with PM;
- Evaluates, in agreement with PM, sponsoring suggestions providing high visibility to the Project and/or the Astaldi Türkerler Joint Venture at local level;
- Relation with Press
- Represents, for the Project, the sole internal reference for the relationships with media at local level;
- Manages, by constantly interacting with PM, the relationships with the press, by further taking advantage of the collaboration with third-party companies

7. FEATURES OF THE WORKS

Ankara Etlik Integrated Health Campus Project (EIHCP) is one of the first Public Private Partnership (PPP) construction project and finance model in the Turkish healthcare sector formed by The Ministry of Health of the Republic of Turkey (MoH) and ATJV.



Through a PPP Model, a scheme of up to 28.5 years (up to 3.5 years construction plus a 25 year operating term) for the development, design, engineering services, financing and the provision of products and

services will be held by Ankara Etlik Hastane Sağlık Hizmetleri İşletme Yatırım A.Ş. The construction of the Ankara Etlik Integrated Health Campus (EHC) will be held by Türkerler-Astaldi Joint Venture.

This project aims to:

- Renovate the insufficient healthcare infrastructure that will serve increasing healthcare demands;
- Bring smaller hospitals together under one campus;
- Increase service quality and efficiency.

Ankara Etlik IHC – PPP will be a facility with a total capacity of 3,566 beds consisting of: A 694-bed general hospital, a 500-bed woman's hospital, a 468-bed children's hospital, a 362-bed cardiovascular surgery hospital, a 484-bed oncology hospital, a 478-bed orthopedics hospital, a 300-bed rehabilitation hospital, a 40-bed autism center, a 34-bed diagnosis and treatment unit, a 106-bed psychiatric hospital and a 100-bed high-security psychiatric hospital.

8. PLANNING AND IMPROVEMENT

Each PM shall be responsible for defining project's improvement objectives by taking into account:

Community Health and Safety

- Legal requirements and other requirements as set forth in REGNORM;
- Astaldi Türkerler JV Quality, Health, Safety and Environment Policy
- Astaldi Türkerler JV Security Policy (Annex 1), Security Plan (Annex 7)
- Astaldi Türkerler JV Responsible Procurement Policy (Annex 3)
- Astaldi Türkerler JV Code of Ethics (Annex 4)
- Safety Management Plan
- Environmental Management Plan
- Significance of the risks connected with work activities;

Labour

- EN ISO 26000 : Social Responsibility
- Astaldi Türkerler JV Human Resource Policy (Annex 3)
- Worker Code of Conduct (Annex 5)
- 4857 number Turkish Labour Law

General

- Technological options available;
- Financial, operational and commercial needs;
- Involved parties' opinions, if any;

By way of example, some improvement objectives may be the following:

- Investments in apparatuses and equipment complying with safety standards higher than those presently available;
- Objectives of improvement of performance indicators attributable to the various site functions.

Such check consists in drawing up the written document setting forth the progress of the initiatives, and keeping the relevant documents with the records.

9. INFORMATION to PUBLIC

Following channels will be utilised in informing the public

- People in neighbouring district will be informed by brochures and with web site (www.aeh.com.tr)
- Suggestion and Complaint mechanism will be established for complaints and suggestions.
- Human Resources Department
- Public Relations Officer
- Stakeholder Engagement Process.

10. MANAGEMENT OF SUBCONTRACTORS

Subcontractors, service providers, suppliers will be provided the Company plans and procedures with the Contract and activities will be guided under these plans and procedures.

We will prepare card-pass system. Work time of all workers following by our administrative department. Our Sub contractors work activity should be compliance to Turkish Labour Law.

Procurement procedure and Interface List is utilised to clarify responsibilities with subcontractors.

Penalty Procedure (Annex 13 of Safety Management Plan is applicable for non-conforming activities of subcontractors)

11. SUGGESTION AND COMPLAINTS MECHANISM

Complaint mechanism is designed for both Project workers and the community During ESIA stage, Section 3.6 of ESMMP “Communication and Grievance Procedure” and Section 3.7 of ESMMP “Staff Grievance Procedure” have been developed.

- In the neighbouring area of the project site boxes will be located for complaints and suggestions and public will be informed about the implementation. Project website (www.aeh.com.tr) will be utilised for delivery of suggestions and complaints. Public Relations department is also in charge of dealing with suggestions and complaints. Grievance forms and grievance closeout forms are developed.
- Mechanism will be provided for delivery of worker complaints and suggestions. Further details of the mechanism are provided in Suggestion and Complaints Procedure Annex 11 of Safety Management Plan.

12. HEALTH, WORK, SOCIAL AREA, RIGHTS of WORKERS

Persons living in neighbouring district will be preferred in recruitment.

Workers accommodation and social area will be designed according to IFC and EBRD requirements. Requirements are indicated in Social Area Plan as an Annex 16 of Safety Management Plan.

In order to minimise any adverse behaviour of workers, training will be provided on relations with public. Subcontractor staff will also be monitored in that aspect.

In case foreign firms are contracted and significant numbers of foreign workers are involved in the Project, special attention will be given to ensure that all Turkish and international labor laws and regulations (e.g. ILO core labor standards such as in respect to child labor, working hours, overtime compensation, etc.) are complied with.

FLOW DIAGRAM for MONITORING of SUBCONTRACTS

| | Activity |
|---|---|
| 1 | Contract signature with subcontractor |
| 2 | Site Delivery Protocol to subcontractor |
| 3 | Site Delivery Protocol + contract. Preparation of Social Security Administration (SGK) sub-file |
| 4 | Subcontractor staff - Contract Worker Code of Conduct Annex 5 Typical Worker Contract Annex 6 |
| 5 | Subcontractor staff - Health Report All of the personnel will have health check at the recruitment phase. Personnel, working on heights and confined space will receive special permit to work. Plans of Periodical Health Checks for workers will be provided. Intervals of health check for workers working at heights and in confined space will be arranged |
| 6 | Subcontractor staff -Training Induction Training will be provided to workers at the recruitment phase, worker code of conduct will be explained in detail. Workers training plans will be adapted to current legislations and Training Matrix, which is appendix of Safety Management Plan. Personel Protective Equipment will be provided considering safety working conditions and utilisation will be monitored. Personnel Protective Equipment is detailed in Personnel Protective Equipment Procedure, which is Annex of Safety Management Plan. Emergency teams will have special traing on first aid, fire safety etc. |
| 7 | Subcontractor staff - Personnel File Personnel file is recorded according to Safety Management Plan – Annex 14 Employment Procedure – Induction Documentation Control Form |

| | |
|----|---|
| | Violation of personnel on the code of conduct will be recorded and warning and penalty mechanism will be applied according to Labor Act of Turkey (4857) and Occupational Health and Safety Law (6331) and recorded according to Penalty procedure. |
| 8 | Subcontractor staff - Personnel card |
| 9 | Subcontractor staff - Monitoring of Monthly Shift |
| 10 | Subcontractor staff - Monitoring of Monthly Payroll Monitoring and inspection mechanism for workers payroll and other rights will be established both for the contractor and subcontractors. |
| 11 | Subcontractor staff - Monitoring of Social Security Administration (SGK) premium |
| 12 | Provisional Acceptance Protocol to Subcontractor |
| 13 | Provisional Acceptance Protocol + Payment of %2 of workmanship of contract value. Closure of Social Security Administration (SGK) file |
| 14 | Subcontractor staff – Overtime and overtime Compensation of Monitoring (will be applied according to Labor Act of Turkey-4857) |
| 15 | Subcontractor Staff – Monitoring of for personal notices on termination of employment and disciplinary procedures |

Asturk JV personnel will not work more than 11 hour in a day and 270 hour in a year as stated in 4857 numbered Labor Law. Additionally, according to Labor Law, workers that will work more than 45 hour in a week will be adjusted with additional holiday.

In order to prevent night overtime payment, worker that works daytime will not be allowed to work at night and for only night works, shift system will be applied. In night shift system, worker that work at night will be rested for the following day.

Same system will be applied by subcontractors and monitored by card system that will be implemented by Asturk JV. Non-conformity detection in the application of the system will be corrected by the implementation of Corrective/Preventive Action, Non-conformity and Penalty Processes presented in Safety Management Plan of Asturk JV.

12.1 Leave and Notice

As stated in 4857 numbered Labor Law, rescission of employment contract of indefinite duration shall be notified. Law indicates that employment contract of indefinite duration is considered as dissolved;

- Two weeks later from the day of notice, if a personnel worked less than 6 month.
- 4 weeks later from the day of notice, if a personnel work time is between 6 month and 1,5 year.
- 6 weeks later from the day of notice, if a personnel work time is between 1,5 to 3 years.
- 8 weeks later from the day of notice, if a personnel work time is more than 3 year.

Presented leave and notice processes will be followed during the project and same process will be applied by subcontractors. Subcontractors will be followed for the application of leave and notice

processes stated in 4857 numbered Labor Law and Non-conformity detection in the application of the system will be corrected by the implementation of Corrective/Preventive Action, Non-conformity and Penalty Processes presented in Safety Management Plan of Asturk JV.

13. TRAFFIC MANAGEMENT

- Project will have an impact on traffic in the district.
- Controlled entry and exit will be provided on the construction site. Necessary guidance and accompany will be provided.
- Impacts and mitigation measures to be implemented during construction are explained in “Annex 1 Security Policy” and “Annex 7: Security Plan” in detail.
- Pedestrian ways will be constructed inside construction site with maximum 150 cm width and seperated from road with barriers.
- Workers will work only in their assigned areas.
- Working hours and manpower will be monitored considering legal limit requirements
- Mobilisation plan will be applied considering HSE criterias and accordingly traffic control points will be established.

14. RESPONSIBLE PROCUREMENT POLICY

- Health & Safety – we expect our suppliers to adopt management practices in respect of Health & Safety which provide a high level of safeguarding for their workers and community?.
- Fair Business Practices – Astaldi – Türkerler JV Code of Conduct (Annex 6) outlines the ethical standards and fair business practices by which Astaldi – Türkerler JV conducts business and we expect our suppliers to adopt similar principles.
- Environmental Protection – we expect suppliers to maintain effective policies, processes and procedures to manage their environmental impact.
- Human Rights – we expect our suppliers to develop and implement policies and procedures to ensure all human rights in their business and to encourage their suppliers to do likewise.
- Local Community Development – we expect our suppliers to contribute to the social economic and institutional development of the communities with which they operate.

15. FORCED LABOR

According to Asturk JV HR Policy and IFC Performance Standard 2: Asturk JV, Subcontractors of Asturk JV and all suppliers and third parties will not employ forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any

kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. The client will not employ trafficked persons.

This topics will be indicated in All Asturk JV Agreements.

Documents Connected Therewith:

- *Annex 1: Astaldi Türkerler JV Security Policy*
- *Annex 2: Astaldi Türkerler JV Human Resources Policy*
- *Annex 3: Astaldi Türkerler JV Responsible Procurement Policy*
- *Annex 4: Astaldi Türkerler JV Code of Ethics*
- *Annex 5: Worker Code of Conduct*
- *Annex 6: Typical Worker Contract*
Annex_6_Astaldi-Türkeler - Special Conditions of Employment Agreement Blue Collar
Annex_6_Astaldi-Türkeler - Special Conditions of Employment Agreement White Collar
- *Annex 7: Security Plan*