

REPUBLIC OF TURKIYE

ISTANBUL PROJECT COORDINATION UNIT (IPCU)



Istanbul Resilience Project (IRP)

P508170

LABOR MANAGEMENT PROCEDURES (LMP)

February 2025

Table of Content

Abbreviations and Acronyms	4
1 INTRODUCTION	5
2 PROJECT OVERVIEW	6
3 OVERVIEW OF LABOR USE ON THE PROJECT	7
3.1 Characteristics and Number of Project Workers:.....	7
3.2 Timing of Labor Requirements:	8
4 ASSESSMENT OF KEY POTENTIAL LABOR RISKS	9
4.1 Project activities:	9
4.2 Key Labor Risks: General understanding and implementation of occupational health and safety requirements.....	10
4.3 Sexual Harassment, Abuse, and Gender-Based Violence.....	10
5 BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS	13
6 BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY	23
7 RESPONSIBLE STAFF	26
8 POLICIES AND PROCEDURES	30
8.1 Occupational Health and Safety (OHS) Policies.....	31
9 AGE OF EMPLOYMENT	35
10 TERMS AND CONDITIONS	36
11 GRIEVANCE MECHANISM.....	38
11.1 Worker’s Grievance Mechanism	38
11.2 Grievance Management Roles and Responsibilities	39
11.3 Key Features of Sexual Exploitation and Abuse/Sexual Harassment Management in the Grievance Mechanism	39
11.3.1 Steps for Handling SEA/SH Complaints:.....	40
11.3.2 Awareness-Raising:	41
12 CONTRACTOR MANAGEMENT	42
13 PRIMARY SUPPLY WORKERS	44

List of Tables

Table 1: National Legislation on Child Labor	13
Table 2: National Policies and Actions on Child Labor.....	14
Table 3: International Programs on Child Labor	15
Table 4: Sexual Harassment Information	18
Table 5: Main Roles and Responsibilities.....	27

List of Annexes

ANNEX 1: Grievance Registration Form	45
ANNEX 2: Grievance Close Out Form	46
ANNEX 3: Grievance Log	47
ANNEX 4: Code of Conduct	48

Abbreviations and Acronyms

CoC	Code of Conduct
CIMER	Presidential Communication Center
ESS	Environmental and Social Standards
ESCP	Environmental and Social Commitment Plan
ESHS	Environmental, Social, Health, and Safety
GM	Grievance Mechanism
GRS	Grievance Redress Service (World Bank)
ILO	International Labour Organization
IPCU	Istanbul Project Coordination Unit
IRAP	Istanbul Disaster Risk Reduction Plan
IRP	Istanbul Resilience Project
LM Plan	Labor Management Plan
LMP	Labor Management Procedures
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SGK	Social Security Institution
SPD	Standard Procurement Documents
TA	Technical Assistance
TARAP	Türkiye Disaster Risk Reduction Plan
WB	World Bank
WGM	Workers' Grievance Mechanism

1 INTRODUCTION

This Labor Management Procedures (LMP) outlines the requirements related to labor and working conditions during the pre-construction, construction, and operation phases of sub-projects under the Istanbul Resilience Project (IRP), financed by the World Bank (WB) and implemented by the Istanbul Project Coordination Unit (IPCU) with the involvement of relevant stakeholders and utilities. The purpose of this LMP is to promote fair and equitable labor practices, ensuring the fair treatment, non-discrimination, and equal opportunities for all project workers. Additionally, it aims to protect workers' rights and to manage and mitigate labor-related risks, including those associated with occupational health and safety (OHS).

This LMP establishes the requirements and expectations for compliance, reporting, roles and responsibilities, monitoring, and training concerning labor and working conditions. It is adopted by IPCU and applies to all project workers involved in sub-projects. It ensures IPCU's compliance with the WB's Environmental and Social Standard (ESS) 2, "Labor and Working Conditions," as well as Turkish labor, employment, and occupational health and safety regulations.

The LMP identifies potential labor risks and impacts and describes the measures to mitigate them. IPCU will make reasonable efforts to require contractors and other intermediaries involved in procuring labor to adhere to the principles outlined in this procedure.

This document is living document and will be updated as necessary to reflect new information or changing circumstances throughout the project lifecycle.

2 PROJECT OVERVIEW

Istanbul Resilience Project (IRP) is envisaged as part of a long-term strategic engagement to increase disaster and climate resilience in the Istanbul Province, given its very high exposure to multiple hazards such as earthquakes, floods, extreme weather events, and wildfires. While ongoing efforts aim to mitigate disaster and climate risks, the high vulnerability and exposure of people and assets mean that a disaster such as a high-magnitude earthquake, flash flooding, or extreme heat, could significantly impact millions of people and the economy in the Istanbul area. These events may also occur within the same period, compounding their effects.

Therefore, there is an urgent need to scale up disaster and emergency response in the Istanbul area in parallel to efforts to reduce risks. Considering these issues, the Project will finance the most urgent and high priority actions under the Istanbul IRAP that significantly enhance preparedness and response capacity of professional responders and community members alongside a strategic reduction in disaster and climate risks and reduce CO2 emissions. The IPCU has conducted a comprehensive mapping of ongoing and planned programs implemented by development partners, including the Istanbul Provincial Disaster Risk Reduction Plan (IRAP) and Türkiye Disaster Risk Reduction Plan (TARAP), to ensure the proposed investments under this project are complementary and address critical gaps. This mapping exercise aims to avoid duplication of efforts and maximize synergies across different initiatives. The Project will also support technical assistance (TA) activities to identify longer-term investments needs across various sectors, such as energy, transportation, and water management. This will include sectoral assessments, pre-feasibility studies, and economic analyses to inform future interventions and ensure alignment with national and international resilience objectives.

3 OVERVIEW OF LABOR USE ON THE PROJECT

3.1 Characteristics and Number of Project Workers:

The Environmental and Social Standard (ESS) 2 of the Environmental and Social Framework (ESF) Labor and Working Conditions categorizes the workers into four (4) categories: (i) direct workers, (ii) contracted workers, (iii) primary supply workers, (iv) community workers. The application of these worker definitions under ESS 2 to the Project is as follows:

Direct Workers: Direct workers are individuals with whom the Borrower has a directly contracted employment relationship, granting specific control over their work, working conditions, and treatment. These workers are employed or engaged by the Borrower, paid directly by the Borrower, and subject to the Borrower's daily supervision and operational control. Direct workers of IRP will include the employees of the IPCU, who will work directly in relation to the project. These are listed below:

- **Personnel employed within the Borrower's project implementation unit (IPCU),** responsible for supervising, coordinating, and monitoring project-related activities carried out by contractors, consultants, and other engaged parties.
- **Staff engaged in tasks such as overseeing design and construction activities,** ensuring compliance with technical and contractual requirements, conducting monitoring and evaluation, or facilitating community engagement.
- **Independent consultants hired by the IPCU,** specialized in disciplines such as design review, construction supervision, social safeguards, risk management, environmental assessment, and community relations.

For the implementation of this project, the estimated total number of direct workers to be engaged is approximately 40 individuals. This workforce is essential for the successful oversight and coordination of project activities, ensuring alignment with project goals and adherence to required standards.

Contracted workers: Contracted workers are individuals employed or engaged by contractors to perform work or provide services directly related to the core functions of the project. In such arrangements, the contractors are responsible for managing the work, working conditions, and overall treatment of these workers. The employment relationship in these cases exists solely between the contractor and the project worker, even if the worker is consistently engaged in activities critical to the project.

Contracted workers employed within the scope of the project will include individuals hired by the project, such as experts, consultants, trainers, contractors' employees, and other workers. These are categorized as follows:

- **Construction activities and infrastructure development:** Workers engaged in tasks such as building, installation, and civil works.
- **Training, design, and supervision consultancy services:** Personnel employed by consultancy firms to provide expertise in areas such as project design, engineering reviews, and construction supervision.
- **Other specialized project-related tasks:** Workers performing duties outlined in the contractor's scope of work, which may include technical, logistical, or administrative roles.

At this stage, when the Labor Management Procedures (LMP) are being prepared, providing an accurate estimate of the total number of contracted workers is not feasible. This limitation arises due to the dependency on contractors' detailed work plans and schedules, which will only be finalized post-procurement. Once the contractors are selected and their implementation plans undergo review and approval, the precise number of contracted workers will be established. This data will then be formally

documented to ensure compliance with monitoring and reporting obligations, as well as alignment with the project's labor management framework and applicable requirements under ESS2.

Primary Supply Workers. A primary supply worker is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. Primary supply workers of IRP are expected to be the employees of third-party companies who, on regular, will basis provide goods or materials essential for the core functions of the project.

At this stage, the exact number of primary supply workers required has not been determined. This will become clearer once construction and procurement activities commence, and the specific needs of the project are assessed. As supply contracts are finalized, detailed information about the roles, responsibilities, and numbers of primary supply workers will be documented and incorporated into the project's labor management procedures to ensure compliance with applicable labor laws and standards.

The project workforce is expected to include a diverse range of individuals with varying characteristic profiles, reflecting the specific needs and goals of the project. These may include local workers, national or international migrants, and both skilled and unskilled labor.

Detailed workforce profiles will be documented and updated as implementation progresses.

3.2 Timing of Labor Requirements:

Direct workers will be engaged from the beginning of the project and will work full time throughout the duration of the project. Contracted workers will be recruited on an activity basis as a result of the tender. Working duration will be different for each activity, but they will generally be employed full time.

4 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

4.1 Project activities:

The project involves a variety of activities carried out in multiple locations, each with its own labor dynamics and risks. Key activities include:

IPCU Project and Contract Management:

Coordination, management, and supervision of project activities and contracts by the IPCU, ensuring alignment with project objectives, standards, and timelines while maintaining environmental and social compliance. Ensuring the integration of renewable energy systems such as solar panels and clean fuel options for emergency response vehicles in line with national energy efficiency policies into project designs, particularly targeting sustainable urban development. IPCU will also ensure stakeholder engagement and social inclusion measures throughout project implementation.

Energy Efficient and Sustainable Building Construction Works

The project involves the implementation of critical infrastructure projects, including seismic retrofitting and climate-resilient design of public buildings, incorporating energy-efficient technologies and nature-based solutions, and the construction/reconstruction of resilient self-sufficient public buildings, dormitories, and multipurpose community hubs, as well as the establishment of emergency response facilities such as control and coordination centers, and logistics facilities.

Planting and Ecological Restoration:

Activities focused on environmental sustainability, such as planting resilient tree species around forested areas to mitigate climate risks, wild fires and promote ecological balance.

Supervision and Design Tasks:

Oversight and technical operations carried out by consultancy firms, including tasks like detailed design review, construction supervision, and ensuring compliance with technical, environmental, and social standards. Ensuring compliance with the Environmental and Social Management Framework (ESMF), including occupational health and safety (OHS) and gender equality aspects.

Awareness Raising Activities:

Disaster preparedness, climate change adaptation trainings and public awareness campaigns for community members, focusing on vulnerable groups such as women, the elderly, and people with disabilities. Distribution of emergency kits and conducting regular evacuation drills.

Procurement of Goods:

Procurement of critical materials, including emergency response equipment and vehicles rescue emergency communication equipment, and wildfire response tools etc. sourced from primary suppliers. Ensuring sustainable procurement practices and adherence to World Bank procurement guidelines.

Technical Assistance:

Deploying early warning systems for natural disasters and conducting feasibility studies for long-term resilience in key sectors. Conducting sector-wide vulnerability assessments and developing strategic frameworks for long-term resilience investments

These activities will be performed by a diverse workforce, including direct workers, contracted workers, and possibly migrant, seasonal or temporary workers, with roles varying depending on their expertise and project phase.

4.2 Key Labor Risks: General understanding and implementation of occupational health and safety requirements

Occupational health and safety (OHS) risks will range from low to high, depending on the nature of the work to be undertaken. Key labor risks associated with OHS include the following:

Occupational Health and Safety (OHS) Risks

1. Physical, Chemical and Electrical Hazards:

- Working at height, leading to risks of falls.
- Accidents during lifting or handling heavy structures.
- Accidents involving exposed rebars and rotating/moving equipment.
- Traffic accidents during material transport.
- Vibration from heavy construction equipment and excavation works.
- Demolition-specific hazards, including structural collapses.
- Exposure to chemicals such as paints, solvents, lubricants, and fuels.
- Exposure to hazardous materials such as asbestos, silica, and other airborne agents
- Electrocutions and burns from faulty electrical devices or arc faults.
- Welding-related hazards such as fumes, burns, and radiation.
- Environmental hazards during work, including exposure to snakes, wasps, bees, or other wildlife.

2. Ergonomic and Workplace Safety:

- Poor ergonomics during construction activities, leading to musculoskeletal injuries.
- Lack of awareness and compliance with PPE use and safe workplace practices.
- Inadequate training for operating construction machinery or managing workplace risks.

3. Specialized Activity Hazards:

- Timber cutting hazards, such as tree falls or accidents with chainsaws.
- Risks during steel erection for towers or similar structures.
- Excavation-related hazards, including cave-ins or accidents in steep and unstable terrain.

4. Communicable Diseases and Health Risks:

- Infectious health disease or other epidemic risks due to close proximity of workers.
- Inadequate hygiene or healthcare facilities on-site.

5. Social Risks

- Risks of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) due to the influx of workers or workplace environments, although this is less expected in this job.
- Lack of an effective workers grievance mechanism, as employees may face issues such as unfair treatment, wage delays, excessive overtime working hours, poor working conditions such as lack of adequate rest period, etc., or unsafe practices, which may lead to complaints or grievances.

4.3 Sexual Harassment, Abuse, and Gender-Based Violence

Abuse and gender-based violence under national legislation are prohibited however and there are legal sanctions on these issues. Based on a workforce that will be hired largely locally, significant labor influx is not foreseen and the risk for sexual exploitation and abuse/sexual harassment (SEA/SH) is assessed as

low. During implementation period the contractors and workers will be required to follow the Code of Conduct included in

ANNEX **4** of this LMP and adhere to the principles below.

During the all project phases the following principles will be adopted and applied. These are:

- a. Foster a culture of respect and high standards of ethical behavior across institutions.
- b. Establish and maintain standards aimed at preventing sexual harassment, abuse, and exploitation and other forms of misconduct.
- c. Provide a safe and trusted environment for those affected by sexual harassment, abuse, and exploitation to step forward to report incidents and concerns, with the assurance that they will be treated respectfully and consistently.
- d. Provide protection for those affected, as well as whistle-blowers and/or witnesses within their institutions, and to take appropriate measures against any form of retaliation.
- e. Maintain robust policy frameworks and clear institutional mechanisms that address how incidents and allegations will be handled should they arise.
- f. Provide effective training programs so all staff understand the requirements and standards of behavior expected of them as international civil servants.
- g. Support clients to develop and implement policies and mechanisms that address sexual harassment, abuse, and exploitation.

Mandatory trainings will be given on codes of ethics/conduct and harassment and misconduct issues for workers.

5 BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

The labor framework in Türkiye is primarily governed by Labor Law No. 4857, which sets out the fundamental principles and standards for employment relationships, working conditions, and employee rights. This legislation ensures fair treatment, regulates terms and conditions of work, and promotes compliance with occupational health and safety requirements. In addition, complementary regulations, such as the Social Insurance and General Health Insurance Law No. 5510, provide additional guidance on social security and healthcare entitlements. Furthermore, dispute resolution mechanisms are outlined in the Law on Labor Courts No. 7036, which mandates mediation as a prerequisite for litigation in disputes related to wages, severance, and reinstatement claims, except for occupational illnesses and workplace accidents. Arbitration is also regulated under the Trade Unions and Collective Labor Agreements Law No. 6356 for resolving collective disputes. These laws collectively establish a robust legal framework that applies to all categories of workers, including permanent, temporary, seasonal, and community workers, aligning with the provisions of ESS2.

The employers are expected to fulfill the obligations described;

A. Forced Labor

- Forced labor is explicitly prohibited under Labor Law No. 4857. Employers are not allowed to compel employees to work without their consent.
- The Constitution of the Republic of Türkiye, Article 18 prohibits forced labor: “No one shall be forced to work. Forced labor is prohibited. Work required of an individual while serving a sentence or under detention provided that the form and conditions of such labor are prescribed by law, services required from citizens during a state of emergency, and physical or intellectual work necessitated by the needs of the country as a civic obligation shall not be considered as forced labor.”

B. Child Labor

- The subject of child labor is defined in the Turkish legislation within the framework of the constitution, laws, and regulations. The **Table 1** below presents the list of respective articles from the national legislations on child labor.

Table 1: National Legislation on Child Labor

Legislation Name	Article No	Explanation
The Constitution of the Republic of Türkiye	50	Nobody can be employed in jobs that do not match their age, gender, and strength. Children, women, and those with physical and mental disabilities are specially protected in terms of working conditions
Labor Law (No. 4857)	71	The minimum employment age is 15. However, children who have completed the age of 14 and their primary education may be employed on light works that will not prevent their physical, mental, and moral development, and for those who continue their education, in jobs that will not prevent their school attendance.
Regulation on the Procedures and Principles of Employing Child and	6	Children who have completed the compulsory primary school age and do not attend formal education cannot work more than seven hours a day and thirty-five hours a week. These periods can be increased up to eight hours a

Young Workers (06.04.2004/25425)		day and forty hours a week for children who have completed the age of fifteen.
Primary Education and Training Law (No. 222)	59	Those who do not attend compulsory primary education institutions cannot be employed (for a fee or for free) in any official and private workplaces. Those who document that they attend primary education institutions can be employed in such places except for the lecture hours provided that the provisions of the law regulating the employment of children are applied.
Child Protection Law (No. 5395)	4	The basic principles for the protection of the child rights are explained.
Prime Ministry Circular (2017/6)	5	Provincial Public Health Directorates are responsible for regular screening for seasonal agricultural workers and their families for cancer screening and for infectious and epidemic diseases, monitoring pregnant, infants and children, and for reproductive and women's health services with mobile teams or by assigning health personnel according to population density.
	7	The Provincial Directorate of National Education is obliged to take measures to ensure the continuing education of seasonal migrant agricultural workers' children.
Public Health Law (No. 1593)	173	Employment of all children under the age of 12 as labor and apprentice in all kinds of businesses, such as factories, workshops, mines is prohibited.
Vocational Training Law (No. 3308)	13	The owner of the workplace must make a written apprenticeship contract with the parent of the candidate before starting the apprentice.
Restructuring of Some Receivables and Social Insurance and General Health Insurance Law-6111	51	In this article, it has been introduced that discontinuous workers in agriculture and forestry sectors will work with insurance and their insurance will be evaluated within the scope of 4 (a) at the same law. Agricultural workers under this insurance have been given the opportunity to benefit from work accident, occupational disease, disability, old age, death insurance and general health insurance.

In addition to national legislations, Türkiye has a large number of national programs and policies on child labor which are provided in the **Table 2** below.

Table 2: National Policies and Actions on Child Labor

Policy Title	Scope
The National Time-Bound Policy and Program Framework (TBPPF)	TBPPF aims to eliminate the worst forms of child labor by 2015, has been developed in 2005 with the support of the ILO.
National Program on the Elimination of Child Labor (2017–2023)	Identifies seasonal migratory agriculture, street work, and work in small and medium industrial enterprises as priority sectors for government efforts to combat child labor. Outlines a series of nationwide interventions aimed at eliminating child labor, including combating poverty, inclusive education, and increasing social awareness. In 2018, the Turkish Government continued its implementation.

Joint Declaration of the Elimination of Child Labor	In 2018, the Turkish Government contributed to the National Program on the Elimination of Child Labor objectives by signing a Joint Declaration of the Elimination of Child Labor, declaring 2018 as the Year of Elimination of Child Labor.
Second National Action Plan on Combating Human Trafficking	Outlines Türkiye's strategy for the prevention of human trafficking. Identifies children as an exceptionally vulnerable group and calls for special security precautions for children at shelters for victims and increased international cooperation on preventing child trafficking.
National Employment Strategy (2014–2023)	Aims to identify and solve labor market issues, with the goal of job creation and sustained economic growth. Includes the prevention of child labor, especially hazardous work in agriculture, as a focus of the plan. Advocates for increased access to education and strengthened social services as a means of preventing child labor. Initiatives in the new action plans include requiring Provincial Employment and Occupational Education Boards to evaluate progress in combating child labor locally and organizing activities to raise awareness about child labor in connection with the World Day Against Child Labor. The Monitoring and Evaluation Board met in 2018 to review actions taken against child labor.
Twelfth Development Plan (2024–2028)	Identifies Türkiye's strategy and goals for economic development. Includes the priorities of alleviating child poverty and increasing equal opportunity in education. Includes provisions for the prevention of the worst forms of child labor. Efforts to prevent child labor will be pursued with determination. <ul style="list-style-type: none"> • Activities in the field of combating child labor will be enhanced, and awareness on this issue will be raised among the public sector, private sector, and society. • The applicability and traceability of policies developed at the central level for combating child labor will be strengthened at the local level. • The capacity of units combating child labor will be increased, and cooperation and coordination will be improved among institutions, organizations, universities, NGOs, and the private sector working in this field at the local level. • Country's efforts to combat child labor will be represented on international platforms.

The list of international programs in which Türkiye is a party and has an important role are provided in the **Table 3** below.

Table 3: International Programs on Child Labor

Program Title	Scope
The International Program for the Elimination of Child Labor (IPEC) – (1992-2008)	Türkiye was one of the first six countries to participate to IPEC in 1992. The ensuing program support delivered by ILO-IPEC, was formulated jointly with the Turkish Government in coherence with national policies and objectives. Since that time, Türkiye has been working on reducing incidences of child labor and has made progress in ensuring children's rights. In the context of IPEC, a number of projects have been implemented.

UNICEF in Türkiye	UNICEF in Türkiye works to eliminate child labor targeting Turkish and refugee children through a multi-sectoral strategy involving capacity development, support to services for families at risk, and evidence generation and advocacy. They work in partnership with ministries, employer associations, municipalities, NGOs, and other UN agencies.
Further Programs to address child labor	Conditional Education and Health Care Assistance Program Programs for Syrian Refugee Children Programs focused on Human Trafficking

C. Wages and Deductions

- Article 32 of Labor Law defines the wages as; “in general terms, wages are the amount paid to someone by the employer or third parties in exchange for a job and paid in money. As a rule, wages, premiums, and bonuses are paid, in Turkish money, to a bank account opened at the workplace or privately. If the wage has been decided in terms of a foreign currency, it may be paid in Turkish money according to the currency rate on the date of payment. Wage payment must not be made in bonds, coupons or another paper claimed to represent the national currency valid in the country or by any other means whatsoever.
- The minimum wage is determined annually by the Minimum Wage Determination Commission and applies to all workers (Article 39). Employers must ensure no worker is paid below this threshold.
- Wage deductions are allowed only as specified by law, such as taxes, social security contributions, and union fees. Unauthorized deductions are prohibited, and workers may file complaints for recovery of withheld wages (Article 35).
- Wage may be paid on a monthly basis at the latest. The time of remuneration may be reduced down to one week by employment contract or by collective agreement. Statutory limitation on wage claims is five years.
- If wages are delayed by more than 20 days (excluding force majeure), workers have the right to cease work without termination of their contracts. Employers are liable for the highest interest rate applied to delayed wages (Article 34).

D. Working Hours and Rest Periods

- The standard workweek is capped at 45 hours. Daily working hours may not exceed 11 hours, including overtime (Article 63). Flexible arrangements, such as shift work or part-time work, must comply with labor law.
- Workers are entitled to at least 24 hours of uninterrupted rest per week (Article 46). For workers exceeding 7.5 hours in a single day, a rest break of at least one hour must be provided, though employers may extend this period.
- Employees are entitled to rest breaks during the workday, calculated as follows: 15 minutes for work periods of less than 4 hours, 30 minutes for work periods of 4 to 7.5 hours, and 60 minutes for work periods exceeding 7.5 hours (Article 68).

E. Termination of Employment

- Employers must provide notice periods before termination, ranging from 2 to 8 weeks depending on the duration of employment (Article 17).

- Employees with at least one year of service are entitled to severance pay as per Article 14. Temporary and seasonal workers may not qualify unless otherwise stipulated in their contracts.

F. Leaves

- Employees are entitled to annual leave based on their length of service, ranging from 14 to 26 days (Article 53).
- Pregnant employees are entitled to maternity leave, and all employees are eligible for sick leave as governed by national legislation.
- Employers must keep detailed records of paid annual leave for each employee. Upon termination of employment, unused leave must be compensated in full (Article 56).

G. Overtime Work

- Overtime work is compensated at 1.5 times the regular hourly wage (Article 41). Annual overtime hours cannot exceed 270 hours unless specified in contracts.

H. Non-discrimination and Equal Opportunities

- Employers must ensure equal treatment regardless of gender, race, religion, language, or similar factors (Article 5). Equal pay for equal work is a key principle of labor law.
- Discrimination is prohibited at all stages of employment, including job advertisements, recruitment processes, and promotions. Employers are required to ensure equal treatment in access to vocational training, promotions, and working conditions (HRET, Article 6).

I. Freedom of Association

- Workers and public officials have different union legislation. Workers were covered by the Unions and Collective Agreements Law (No. 6356) (dated on 07.11.2012, Official Gazette No. 28460).
- According to Unions and Collective Agreements Law (No. 6356) (dated on 07.11.2012, Official Gazette No. 28460) Article 17:
 - Those who are over the age of fifteen and deemed to be workers according to the provisions of this Law may be a member of labor unions.
 - Those deemed to be employers within the meaning of this Law may become members of employer unions.
 - It is free to join the union. No one can be forced to join or not to join the union. Workers or employers cannot be members of more than one union at the same time in the same industry.
 - However, workers working in the same line of business and at the same time in workplaces belonging to different employers may be members of more than one union. In case the workers and employers are members of more than one union contrary to this provision, subsequent memberships are invalid.
- Trade union freedom is guaranteed by Article 25 of this Law according to this, the recruitment of workers cannot be conditioned on whether they are members of any trade union or not.

- On the other hand, public officials were covered by the Public Officials Unions and Collective Contract Law (No. 4688) (Law date: 25.06.2001, Official Gazette No. 24460). According to this Law, Article 14:
 - Public officials can become members of a union established in the service branch of their workplace.
 - It is not possible to be a member of more than one union. Subsequent memberships are void in case of membership in more than one union.
- Additionally, according to Article 18, the public employer cannot make a distinction between public officials whether they are members of any trade union or not.

J. Collective Dismissal

- Article 29 of Law No. 4857 defines the collective dismissal and its conditions. According to the Article:
- When the employer contemplates collective terminations for reasons of an economic, technological, structural or similar nature necessitated by the requirements of the enterprise, the establishment or activity, s/he shall provide the union shop-stewards, the relevant regional directorate of labor and the Public Employment Office with written information at least 30 days prior to the intended lay-off.
- A collective dismissal occurs when,
 - in establishments employing between 20 and 100 employees, a minimum of 10 employees,
 - in establishments employing between 101 and 300 employees, a minimum of 10% of employees,
 - in establishments employing 301 and more workers, a minimum of 30 employees, are to be terminated in accordance with Article 17 of the Labor Law on the same date or at different dates within one month.

K. Sexual Harassment and Workplace Safety

- Employers are obligated to take necessary measures to prevent both psychological and sexual harassment in the workplace. Employees subjected to harassment are entitled to terminate their contracts immediately and seek compensation of up to four months' wages (Labor Law, Article 24). The list of the legislations, policies, plans and international conventions relevant to sexual harassment in the workplace are provided in the Table 4 below.

Table 4: Sexual Harassment Information

Laws/Policies/Conventions	Scope
The Constitution	Articles 41, 66 (2001), Articles 10, 90 (2004), Article 10 (2010).
Turkish Civil Code	The law upholds equality between women and men, puts an end to sexual discrimination.

The Law on the Protection of Family and Prevention of Violence against Women	The law includes specific arrangements to end violence against women.
Labor Law	Any discrimination with respect to basic civil rights, including sex, could not be made in employer-employee relations.
Restructuring Specific Debts and Amending the Social Insurance Law	The wages and premiums of the times worked shall be paid by the employer.
Turkish Penal Code	The law includes modern arrangements with respect to gender equality and domestic violence against women.
Civil Servants Law	The personal rights of female employees and parents.
The Revenue and Corporate Taxes Law	The income yielded by women by selling the home-made products in the charity sales, festivals, and fairs and at places determined temporarily by the state institution and organizations was deemed exempt of tax.
Laws on Project Support to Investments	Private crèches and day-care centers are exempted from the revenue and corporate taxes for five fiscal/taxation periods.
The Law Amending the Republic of Türkiye Retirement Fund of Civil Servants	Female farmers engaged in agricultural activities on their own behaves should be the head of family in order to be covered by the insurance.
The Prime Ministry Circular No. 2004/7 on “Acting in Accordance with the Principle of Equality in Staff Recruitment”	The Circular aimed at preventing sexual discrimination in personnel recruitment
The Prime Ministry Circular No. 2010/14 on “Increasing Women’s Employment and Promotion of Equality in Opportunities”	The Circular aimed at increasing women employment and to implement equal pay for equal work principle for strengthening the socio-economic positions of women
The Rural Development Investments Support Program by the Ministry of Agriculture and Forestry	In the parts of investment projects with 50% grant, in case that the project owner is a female farmer, extra 2 points are added to the points table according to the pre-assessment criteria, and extra 4 points are also added if the woman is a member of agricultural cooperative or union. In case that female farmers engaged in agriculture apply for machinery equipment purchases within scope of the Project, they can benefit from 50% grant for 35 types of machines.
Social Insurance and Universal Health Insurance Law (No. 5510)	Those in insured employment in home-based services shall be considered in the relevant proceedings depending on whether they are recruited less or more than 10 days a month. Those recruited less than 10 days a month shall be insured against occupational accidents and diseases, their premiums shall be covered by the employers and the insured shall be entitled to pay their long-term and general health insurance premiums until the end of the following month, if they choose to do so. On the other hand, the premiums of those recruited for

	ten days and longer a month shall be paid by their employers in scope of easy employer practices.
Policies and Plans	
The National Action Plan on Combating Violence against Women (2016-2020)	The contribution and participation of institutions and organizations taking into consideration the relevant international conventions being a party, in particular the Istanbul Convention and provisions of national legislation,
The Strategy Paper and Action Plan on Combating Early and Forced Marriages (2018-2023)	The main goal of which is to decrease the early and forced marriages and empower the girls.
International Conventions	
The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)	CEDAW was submitted for signature on 1st March 1980, after the Second World Conference on Women. The convention adopted by Türkiye in 1985 entered into effect on 19th January 1986.

In Türkiye, important legal regulations have been enacted on equality of men and women, protecting, and promoting human rights of women and combating violence against women. However, effective implementation of legal regulations on combating violence against women, provision of protection, treatment, and rehabilitation services not only to victims of violence but also to perpetrators and promotion of social awareness of and sensitivity to the issue are as vital as the availability of such legal regulations.

In this framework, the efforts of Ministry of Family and Social Services have made for combating violence against women with a belief that violence against women is intolerable have been maintained with a wide scale, dedicated and comprehensive cooperation. Since the implementation period of “The National Action Plan on Combating Violence Against Women (2012-2015)”, one of the concrete examples of this commitment and cooperation, ended in the end of 2015, “The National Action Plan on Combating Violence Against Women (2016-2020)” has been prepared with the participation and contributions of relevant governmental agencies and organizations, non-governmental organizations and the women’s studies research centers of various universities, taking into consideration the relevant international conventions, in particular the Istanbul Convention and provisions of national legislation, follow-up and evaluation reports on the National Action Plan on Combating Violence Against Women (2012-2015), results of the related studies conducted by the General Directorate on the Status of Women, outputs of the Parliamentary Investigation Committee on the Motives of Violence Against Women and Due Measures and recent social needs and developments.

L. Workers’ Organization

- Employees have the right to join unions and engage in collective bargaining under the Trade Unions and Collective Bargaining Law No. 6356.
- Workers cannot be dismissed or discriminated against for union membership or activities (Article 25).

M. Collective Agreements

- Collective agreements in Türkiye are regulated under the Trade Unions and Collective Agreements Law No. 6356. These agreements may cover sectoral or company-level

arrangements, with unions required to represent at least 3% of workers in a given sector or 50% of workers in a workplace to initiate bargaining (Article 41).

N. Collective Dismissal

- Employers planning to dismiss a significant number of employees must notify the Ministry of Labor and Social Security, as well as the employees, at least 30 days in advance (Article 29).
- During collective dismissals, workers' union rights are protected, allowing them to seek redress through union channels or labor courts.

O. Labor Disputes

- In Türkiye, labor disputes must undergo mandatory mediation before litigation in cases related to employee receivables, reinstatement claims, or bargaining agreements. Exceptions include disputes involving occupational illnesses or workplace accidents (Labor Courts Law, Article 3).

P. Provisions for Special Groups

- The Labor Law provides specific protections for vulnerable groups, including employees under the age of 18, workers with disabilities, pregnant women, and single parents. These protections include additional leave entitlements, limited working hours, and priority in certain employment benefits.
- Female employees are entitled to daily breastfeeding breaks of up to 90 minutes for children under one year old. This time is considered part of the working day and is remunerated as such (Article 74). Additionally, unpaid leave of up to six months is available following maternity leave, which does not count toward annual leave entitlements.

Q. Temporary and Seasonal Employment

- For employment contracts lasting up to 30 days, provisions of the Law of Obligations apply instead of Labor Law No. 4857. This ensures that even transitory workers have basic protections and obligations under the law.

R. Grievance Mechanisms

- The Labor Law does not mandate grievance mechanisms at the workplace level, but best practices encourage employers to establish internal systems to resolve worker complaints. Such mechanisms should include safeguards against retaliation and clear processes for reporting and resolution.
- Employers are prohibited from retaliating against workers who file grievances, report harassment, or engage in union activities. Workers dismissed on these grounds are entitled to seek reinstatement and compensation (Article 25).

S. Dispute Resolution Mechanisms

- Labor disputes are defined in Turkish Labor Law, Article 20. According to this article, the employee whose employment contract is terminated has to apply to the mediator in accordance with the provisions of the Labor Courts Law, with a request for reemployment within one month from the date of notification of termination, claiming that the reason is not indicated in the termination notice or the reason shown is not a valid reason.

- The burden of proving that the termination was based on a valid reason shall rest on the employer. However, the burden of proof shall be on the employee if he claims that the termination was based on a reason different from the one presented by the employer.
- The provisions on mediation are defined in the Law No. 6325 on Mediation in Legal Disputes. Before resorting to litigation, parties are encouraged or required in certain disputes to engage in mediation. Arbitration can also be an alternative dispute resolution method, depending on the agreement between parties.

Application to Different Worker Categories

A. Permanent Workers

- Permanent workers are comprehensively protected under Labor Law No. 4857, with access to fair wages, statutory benefits such as health insurance and severance pay, and termination protections that include notice periods and due process. These provisions ensure long-term job security and equitable treatment for all permanent employees.

B. Temporary and Seasonal Workers (Including Community Workers)

- Temporary and seasonal workers are entitled to fair wages, prorated benefits, and working conditions that comply with safety and labor standards.
- Seasonal workers must receive protections equivalent to those of permanent employees, particularly regarding occupational health and safety measures, equitable payment schedules, and working hours.
- Community workers engaged for short-term project activities are employed under simplified contracts tailored to the nature and duration of their work. Despite the temporary nature of their engagement, they are entitled to fair compensation, access to basic benefits, and adherence to occupational health and safety regulations, in line with Labor Law No. 4857. These provisions ensure that community workers, while temporary, are treated equitably and in compliance with ESS2 guidelines.

C. Migrant Workers

- Labor Law No. 4857 mandates equal treatment for migrant workers, ensuring non-discrimination in wages, working conditions, and access to benefits. Migrant workers, whether domestic or international, are entitled to equal pay for equal work, as well as basic protections such as health insurance and social security contributions.
- Additional protections for migrant workers are governed by migration-specific regulations, including assistance with obtaining work permits, access to adequate housing, and healthcare services. Employers are responsible for ensuring that migrant workers are integrated into the workforce without facing discrimination or exploitation. These measures are in alignment with ILO conventions ratified by Türkiye and ensure compliance with international labor standards.

6 BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

Occupational Health and Safety (OHS) in Türkiye is primarily governed by Occupational Health and Safety Law No. 6331 and supplemented by related regulations under Labor Law (LL) No. 4857. These laws collectively establish the following key provisions:

Employer Responsibilities:

- Conducting regular risk assessments to identify and mitigate workplace hazards (Law No. 6331, Article 10).
- Providing OHS training for all employees, including temporary and seasonal workers, tailored to the nature of their tasks. Additional training is mandatory for: “Workers returning to work after an absence exceeding six months” and “Workers exposed to occupational accidents or diseases, focusing on preventive measures and safe working methods”. Time spent on OHS training is counted as part of regular working hours. (Law No. 6331, Article 17).
- Ensuring the availability of personal protective equipment (PPE) at no cost to workers (Law No. 6331, Article 4).
- Establishing OHS Committees in workplaces with 50 or more employees to monitor and improve workplace safety. These committees meet regularly to oversee and enhance workplace safety practices (Law No. 6331, Article 22).

Worker Rights:

- Workers exposed to serious, imminent, and unavoidable danger are entitled to refuse work and leave the workplace without the risk of termination. They may only resume work after the employer addresses the risk or the Ministry deems the conditions safe (Law No. 6331, Article 13).
- Access to health screenings and periodic medical examinations, particularly for high-risk jobs such as construction, mining, and hazardous material handling.

Worker’s Grievance Mechanisms:

- Employers are required to establish internal grievance systems to address OHS-related concerns, ensuring workers can report hazards or violations without retaliation.
- Labor disputes related to OHS issues may be resolved through mandatory mediation or labor courts, as per Law on Labor Courts No. 7036.

Incident Reporting and Emergency Preparedness:

- Employers must report workplace accidents and occupational illnesses to the Social Security Institution (SGK) within three days (Law No. 6331, Article 14).
- Maintain records of occupational injuries, accidents, and illnesses, ensuring that these records are confidentially stored (LOHS Art. 15).
- Emergency response plans, including fire drills and evacuation protocols, are mandatory for all workplaces.
- Emergency drills and response training must be conducted regularly to ensure readiness.
- Employers must designate an adequate number of personnel trained in emergency response, such as evacuation, firefighting, and first aid. They are responsible for ensuring these personnel are adequately equipped and available at all times (LOHS Art. 11).

Risk Assessments and Protective Measures

- For high-risk workplaces, a comprehensive accident prevention policy document or safety report must be prepared and approved by the Ministry of Labor and Social Security before operations commence (Law No. 6331, Article 29).

Medical Screening and Health Monitoring

- Workers must undergo medical screenings in the following circumstances:
 - Before starting a job (pre-assignment),
 - After being reassigned,
 - Upon returning to work after long absences due to health issues or occupational accidents,
 - At regular intervals determined by the Ministry, based on the workplace's hazard class (Law No. 6331, Article 15).
- Employers must provide medical check-ups free of charge and cover expenses for occupational health screenings.

Special Provisions for Female Workers

- Pregnant and breastfeeding workers are exempt from night shifts and overtime. Employers must also provide lactation rooms for workplaces with over 100 female employees and childcare facilities for workplaces with more than 150 female employees.

Oversight and Enforcement

- Occupational physicians and safety specialists must report life-threatening hazards to employers. If these hazards are not addressed, they must notify the Ministry of Labor and Social Security (LOHS Art. 8).
- The Ministry inspectors are authorized to halt operations in workplaces where hazardous conditions are identified until the issues are resolved.

Other regulations that can be evaluated within the context of the Project are (but not limited to);

Regulation on the Use of Personal Protective Equipment in Workplaces

- The purpose of this regulation is to determine the procedures and principles regarding the features, supply, use and other matters of personal protective equipment to be used in cases where the prevention or adequate reduction of risks in the workplace cannot be achieved by collective protection or work organization or working methods based on technical measures.

Regulation on the Procedures and Principles of Employee's Occupational Health and Safety Training

- The purpose of this regulation is to regulate the procedures and principles of occupational health and safety training to be given to employees.

Regulation on Occupational Health and Safety Committees

- The purpose of this regulation is to determine the conditions of the workplaces in which occupational health and safety committees will be established in order to include information regarding occupational health and safety, and to determine the formation, duties and powers, procedures and principles of these committees, as well as the methods of coordination and cooperation between the multiple established committees.

Regulation on Occupational Health and Safety in Construction Works

- The purpose of this regulation is to determine the minimum occupational health and safety conditions to be achieved in construction works.

Regulation on Occupational Health and Safety Risk Assessment

- The purpose of this regulation is to regulate the procedures and principles of risk assessment to be carried out in terms of occupational health and safety in workplaces.

The occupational health and safety (OHS) legislation in Türkiye aligns closely with the principles outlined in ESS2, paragraphs 24 to 30, ensuring comprehensive protections for all workers. National laws mandate employers to provide safe and healthy working conditions through rigorous risk management practices and strict adherence to safety protocols. This requirement applies universally, covering all categories of workers, including community and migrant workers, to create equitable and secure workplaces.

Special attention is given to vulnerable groups such as employees under 18, pregnant women, and workers with disabilities. These groups benefit from additional legal protections, ensuring their inclusion and safety in the workplace, as emphasized in ESS2. Worker participation is also a key component of OHS in Türkiye. Employees are actively involved in OHS committees and are regularly consulted on workplace safety policies and practices. This participatory approach fosters transparency, accountability, and shared responsibility for maintaining safe working environments.

Grievance mechanisms form an integral part of the OHS framework, mirroring ESS2's emphasis on accessible and effective systems. Employers are required to establish workplace-level grievance procedures, providing workers with channels to report safety concerns or violations without fear of retaliation. For disputes that remain unresolved, workers have recourse to labor courts, ensuring their rights are protected.

To uphold these standards, the Ministry of Labor and Social Security conducts regular inspections to monitor compliance with OHS regulations. Non-compliance is met with administrative penalties, including fines and potential workplace shutdowns, underscoring the government's commitment to enforcing workplace safety. These measures collectively align Türkiye's OHS framework with ESS2, promoting safe, inclusive, and equitable working conditions for all.

Application to Different Worker Categories

- A. **Permanent Workers:**
 - Fully covered by OHS regulations, including access to training, medical screenings, and grievance mechanisms.
- B. **Temporary and Seasonal Workers (Including Community Workers):**
 - Entitled to OHS protections proportionate to their employment duration, with mandatory training and PPE provision.
- C. **Migrant Workers:**
 - Receive equal treatment under OHS laws, with additional provisions for housing and healthcare when required for their roles.

7 RESPONSIBLE STAFF

IPCU will provide oversight and guidance during the implementation of the LMP to ensure compliance with project requirements and national labor laws. Through its supervision consultants, IPCU will ensure the consistent application of the Labor Management Procedures (LMP) across all sub-projects financed under the project. IPCU will also facilitate capacity-building activities for contractors and subcontractors, monitor grievance mechanisms, and review contractors' periodic labor and OHS performance reports to ensure alignment with the overall project standards and national legislation.

As described in their ToRs, the Supervision Consultant(s) will (i) carry out their task on a daily/monthly/defined basis, on the behalf of the IPCU; (ii) employ qualified experts for such oversight and report on contractors' performance to IPCU on a monthly basis.

The contractors will have additional responsibilities alongside legislative requirements and the IPCU's Labor Management Procedures. Their plans will be submitted to the supervision consultant for review and approval before mobilizing for the pre-construction phase, as outlined below:

Contractors will have additional responsibilities alongside legislative requirements and the IPCU's Labor Management Procedures. These responsibilities, which must be addressed through comprehensive planning and implementation, include the following key actions to ensure compliance and effective project execution:

- Contractors must employ or appoint qualified social, labor, and occupational health and safety (OHS) experts to implement the project-specific Labor Management Procedures (LMP) and OHS plans, as well as to oversee subcontractors' performance.
- They are required to prepare their own "LM Plan" and OHS Plan in alignment with the project LMP and ESS2. These plans must cover working conditions, management of worker relationships, equal opportunity provisions, and non-discrimination policies for employment and wages. Additionally, the "LM Plan" should include measures for age verification to prevent child labor, awareness activities on child labor prohibition, and monitoring of primary suppliers to ensure compliance with child and forced labor standards. Quarterly audit reports on these measures must be submitted to the IPCU.
- Contractors must ensure their labor management and OHS plans incorporate gender-sensitive practices, such as balanced representation in OHS committees and targeted training for vulnerable groups. Before engaging subcontractors, contractors are responsible for verifying their compliance with the LMP and national labor laws, including SEA/SH provisions.
- During the project implementation phase, contractors must supervise subcontractors' adherence to labor management procedures and OHS plans, maintain records of recruitment and employment processes, and monitor subcontracted workers' employment to ensure compliance with the LMP and national labor laws. Job descriptions and employment conditions must be clearly communicated to workers, with copies of employment contracts provided.
- Contractors are required to develop, implement, and maintain a grievance mechanism for contracted and subcontracted workers. This mechanism must address grievances promptly and include anonymous reporting channels and safeguards against retaliation, especially for SEA/SH-related issues. Regular reports on grievance mechanism implementation must be submitted to the supervision consultant and IPCU.
- Induction training, including health, safety, and social topics, must be provided regularly to all workers. Contractors must also ensure that all workers, including subcontractors, understand and

sign the Code of Conduct before beginning work. Training on SEA/SH prevention and the Code of Conduct must be conducted at the start of employment and monitored throughout the project lifecycle.

- Contractors must document and report incidents, such as occupational injuries, illnesses, lost time accidents, and SEA/SH-related incidents. Serious incidents must be reported to the IPCU and relevant authorities within 24 hours, and immediate medical and psychosocial support must be provided to affected workers. Medium, severe, fatal, or mass accidents must also be reported to law enforcement and the Labor Inspectorate.
- Disciplinary measures must be applied in cases of SEA/SH misconduct. Contractors are further responsible for establishing a system for regular review and reporting on labor and OHS performance, integrating incident records into these performance reviews.

As outlined in **Table 5**, a clear and concise overview of the main roles and responsibilities of IPCU, the Supervision Consultant, and Contractor Firms is provided, emphasizing their key functions and obligations during project implementation.

Table 5: Main Roles and Responsibilities

Responsible Party/Primary Role	Responsibilities
<p>IPCU <i>Main coordinating body responsible for ensuring compliance with LMP and project standards.</i></p>	<ul style="list-style-type: none"> • Oversee the overall implementation of the LMP and monitor compliance with ESS2 and national labor laws. • Engage and manage contractors/subcontractors in alignment with project LMP and procurement documents. • Maintain records of direct workers and monitor employment processes of contracted workers. • Monitor risks related to child labor, forced labor, and safety issues among primary supply workers. • Ensure the establishment and effective operation of the Worker’s Grievance Mechanism (WGM) and regularly report on it. • Regularly review and report on grievance trends, ensuring complaints are resolved within stipulated timeframes. • Ensure confidential and anonymous grievance submission channels such as notice boards, induction training, and printed materials, are available for all workers. • Monitor OHS standards across all workplaces and ensure relevant training is provided (OHS, SEA/SH prevention, etc.). • Oversee and ensure the timely resolution of grievances within 15 working days and provide feedback to complainants. • Maintain a secure grievance database, ensuring confidentiality and compliance with data protection regulations. • Document and report incidents (injuries, illnesses, SEA/SH cases) and maintain performance records for review. • Inform law enforcement, Labor Inspectorate, and WB about severe, fatal, or mass accidents within 24 hours. • Review and approve contractors’ “LM Plans” and “OHS plans” before mobilization.
<p>Supervision Consultant <i>Monitors contractors’ and subcontractors’</i></p>	<ul style="list-style-type: none"> • Verify that contractors’ “LM Plans” and “OHS plans” align with the project LMP and national labor laws before implementation.

<p><i>compliance with LMP and provides technical guidance.</i></p>	<ul style="list-style-type: none"> • Monitor contractors’ adherence to labor management and OHS plans throughout project implementation. • Ensure that the Workers’ Grievance Mechanism (WGM) includes provisions for SEA/SH complaints and that relevant personnel are trained on survivor-centered approaches. • Oversee training programs and ensure that SEA/SH and OHS standards are implemented effectively by contractors. • Monitor the implementation and effectiveness of the Workers’ Grievance Mechanism (WGM) by contractors and subcontractors. • Monitor the availability of grievance submission channels at all worksites and ensure accessibility for all workers, including marginalized groups. • Ensure proper recording and reporting of grievances, including SEA/SH-related complaints. • Review incidents and grievance reports submitted by contractors and ensure appropriate actions are taken. • Provide monthly supervision reports to IPCU on contractors’ compliance and performance in labor and OHS matters. • Conduct weekly site inspections and audits to assess adherence to LMP and OHS standards. • Provide monthly grievance reports to IPCU, summarizing trends, unresolved grievances, resolution timelines, and satisfaction levels of complainants. Recommend corrective actions to IPCU in case of non-compliance by contractors or subcontractors and provide ongoing feedback on grievance trends and necessary interventions.
<p>Contractor <i>Execute labor management and OHS plans for their workforce and subcontractors.</i></p>	<ul style="list-style-type: none"> • Employ or appoint qualified experts to implement project-specific “LM Plans” and “OHS plans” and supervise subcontractor performance. • Develop, submit, and implement their own “LM Plans” and “OHS plans”, aligned with project LMP, ESS2, and national labor laws. These plans must include worker grievance mechanism guidelines, detailed OHS plans, SEA/SH prevention and response procedures, risk assessment reports and audit logs, and measures to prevent child and forced labor. • Maintain records of recruitment and employment processes for contracted and subcontracted workers. • Provide weekly updates on the functionality of the grievance mechanism, ensuring prompt resolution of worker complaints and reporting outcomes to IPCU and the Supervision Consultant. • Clearly communicate job descriptions and employment conditions to workers and provide signed contracts. • Establish and operate a grievance mechanism for all workers, ensuring anonymity and safeguards against retaliation. The mechanism shall include clear procedures for complaint submission, tracking, and resolution in compliance with project LMP and national labor laws. • Provide workers with clear instructions on how to submit anonymous grievances without fear of retaliation. • Ensure that grievance records are securely maintained and include details on resolution timelines, corrective actions, and complainant satisfaction levels. • Conduct induction training on OHS, HSE, and SEA/SH prevention, and ensure all workers sign the Code of Conduct. Additionally, conduct regular training sessions and awareness-raising campaigns to educate workers on grievance procedures and their rights.

	<ul style="list-style-type: none"> • Conduct periodic audits of the grievance mechanism to assess its effectiveness and implement necessary improvements. • Supervise subcontractors’ compliance with labor management and OHS plans. Contractors are responsible for ensuring subcontractor compliance with labor laws, OHS standards, and project-specific policies. • Contractors must provide specialized safety training to workers engaged in high-risk activities, such as hazardous material handling or excavation. • Develop a specific procedure for handling SEA/SH grievances, ensuring confidentiality and survivor-centered approaches. • Document and report specific incidents (injuries, illnesses, SEA/SH cases) to IPCU, GDs, and relevant authorities. • Regularly report grievance data to the Supervision Consultant and IPCU, ensuring confidentiality and non-retaliation principles. • Provide immediate medical and psychosocial support for affected workers in case of serious incidents. • Notify IPCU, law enforcement and Labor Inspectorate about severe, fatal, or mass accidents within 24 hours. • Submit quarterly labor and OHS performance reports to the Supervision Consultant and IPCU.
--	--

After the bidding process and the selection of contractors, this LMP can be updated to include additional details about the contractors as needed, and the “LM Plan” will be revised accordingly.

8 POLICIES AND PROCEDURES

This section sets out information on OHS, reporting and monitoring and other general project policies. Where relevant, it identifies applicable national legislation.

Where significant safety risks have been identified as part of Section 4, this section outlines how these will be addressed. Where the risk of forced labor has been identified, this section outlines how these will be addressed (see ESS2, paragraph 20 and related GNs). Where risks of child labor have been identified, these are addressed in Section 9.

The Contractors will prepare labor management plan in line with this labor management procedures and national labor law. The principles and procedures presented below represent the minimum requirements but is not an exhaustive list of requirements. The following measures will be developed by the contractors and monitored by the IPCU and supervision consultant to ensure fair treatment of all employees:

Non-discrimination: As specified in the Labor Code of Türkiye, the employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. Any discrimination based on gender, sexual orientation, age, race, ethnicity, political option, social origin, residence, disability, status, or trade union activity, as well as other criteria not related to his/her professional qualities, shall be prohibited.

Recruitment and Employment: Recruitment procedures will be transparent, public, and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, gender, and other grounds included in the Labor Code, other relevant laws, and World Bank ESS2 standard. The contractor will consider following:

- Employment opportunities to the local communities and groups via the most appropriate channels and develop job adverts in the corresponding language and clear and inclusive wording.
- Applications for employment will be considered in accordance with the application procedures established by the contractors.
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- All workers will have written contracts describing terms and conditions of work and will have the contents clearly explained to them. Workers will sign the employment contract. Terms and conditions of employment will be available at work sites.
- Merit-based employment is needed; however, the contractors may prioritize candidates from local communities and disadvantaged groups such as women and the disabled.
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer ('Contractor').
- Depending on the employer's and employee's origin the contracts will be developed in corresponding language understandable for both parties.

- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation.
- While communication language related problems are not expected, attention should be given to ensuring coordination between different contractors and means to address any language differences.
- Foreign workers will require residence permit, which will allow them to work in Türkiye.
- IPCU will include in contracts that all contractor (and subcontractor) personnel must be of the age of 18 years or older.
- The Labor Code prohibits work at night for persons under the age of 18 years. Persons below the age of 18 years will be prohibited to be engaged in hazardous work. IPCU will include in contracts that all contractors (and subcontractor) personnel must be of the age of 18 years or older.

8.1 Occupational Health and Safety (OHS) Policies

OHS Plans: The Borrower will include into the bidding documents specific OHS standard requirements that all contractors and sub-contractors will meet under this project. The standards will be consistent with local regulations, WBG EHS guidelines and GIIP (Good International and Industry Practices). The following OHS standard requirements should as a minimum be included in the OHS Plan to be prepared by the contractors:

- Risk Assessment Procedure.
- Work permitting for hazardous work (working at heights, hot work, work on energized lines, work within confined spaces).
- Emergency response procedure.
- Fall prevention and working at heights.
- Excavation, ladders, and scaffolders safety; welding and cutting safety; cranes, derricks, and forklifts safety; power and hand tools safety.
- Respiratory prevention to chemical and airborne hazards (including dust, silica, and asbestos); electrical safety (hazardous energies control, lock out tag out, energy verification, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, Electrical safety, PPE, and dielectric tools); hazards communication; noise and vibration safety; steel erection safety; fire safety; material handling safety; concrete and masonry safety.
- Construction PPE.
- OHS training.
- Refuse to work policy.

OHS Staff: In addition, occupational health, and safety plans, will among other issues, include the following: the construction contractor will define an OHS accountability matrix for all staff including Project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities. Each Contractor must have its own OHS staff that will be responsible for the implementation and supervision of the OHS program.

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

Safety Standards and PPE: Contractors will provide a safe workplace; therefore, a risk assessment will be completed before the commencement of any construction activities, and safety measures will be implemented in accordance with applicable safety standards. The employer will provide special clothing, footwear, and other personal protective equipment (PPE) to employees free of charge. Such PPE is to be delivered to employees involved in work related to the elimination of the consequences of accidents and natural disasters. When the PPE is dysfunctional, the employer is obliged to replace PPE at their own expense without the employee's responsibility. If the employee purchases PPE at their own expense, the employer is obliged to reimburse such costs.

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

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

Contractors will control the access to the construction site only to authorized people and verify if workers are meeting training and accreditation requirements in accordance with the set training standards and applicable regulatory requirements (i.e., in many countries truck drivers, crane and derrick operators must be accredited, as well as electricians. Workers must be trained to perform hazardous works such as working at heights, confined spaces, welding etc.). All workers must complete at minimum an OHS induction to have access to the construction site.

Refuse to Work Policy: Employees have a right to refuse to perform tasks or instructions assigned by the employer, creating health and safety risks for the employees. Employees are entitled to leave the workplace in the event of danger. The contractors will not dismiss an employee from their job or place them in a less advantageous position than other employees if such employees exercise the rights of reporting or leaving the workplace during the threat of danger.

All contractors are obliged to take appropriate protective measures whenever avoidance of health and safety hazards is not possible. These measures include controlling the hazard at source using protective solutions and providing adequate PPE at no cost to the project/sub-projects worker. The employer will develop and implement reporting system for any accidents, diseases, and incidents.

OHS Committee: There will be a construction OHS committee with representatives of employees, the Borrower, and all subcontractors. Biweekly OHS meetings will be conducted to discuss preventive measures, deviations and non-compliances, accidents, and corrective actions. Contractors will conduct internal OHS surveys and audits to verify compliance of OHS practices. Non-compliances will be

documented and reported internally. A time frame for a corrective action will be set and followed up. Daily OHS briefings will be conducted before the commencement of the works highlighting the hazards and preventive measures from each job. Contractors will document and report to the Borrower all accidents and illnesses with a day lost or more, fatalities or serious injuries that may happen at the work site.

First Aid: There must be on site resources for first aid and for more serious injuries. Furthermore, there must be a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers. Projects with major civil works should have medical doctors on site.

Worker's accommodation: If accommodations are provided for workers, Contractors will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightening protection, separate cooking and eating areas. There will be separate facilities provided for men and women. The contractors will be liable to comply with "Workers' Accommodation: Processes and Standards A Guidance Note" by IFC and the EBRD.

Monitoring and Reporting: The IPCU/Supervision Consultant will conduct periodic supervision of contractor's OHS performance, including site visits, at least monthly. These supervisions will cover compliance with above mentioned standards, accidents, recommendations, and progress of ongoing corrective actions. The Borrower will include in the contract(s) as requirement for contractors to report on issues such as number of accidents rates, severity rates, number of recurring non-compliances, fatalities and serious injuries, and penalties for non-completion. Furthermore, the supervision consultant will review and approve contractors' safety plans and procedures. The contractors will be required to provide the periodic information on the performance in terms of labor, occupational health, and safety issues. The information will be included in the construction contractor's monthly report and will be reviewed by the supervision consultant's team.

In addition, the contractor shall report to the Borrower about any inspections and audits carried out by the respective ministries such as the Labor Inspection. The findings of the labor audits will be presented to the Borrower and the Bank, if requested.

Reporting on accidents and incidents: Immediately or within three working days, the employer shall report to the Social Security Institution, verbally and in writing, any fatality, collective or individual serious injury, due to which the employee is unable to work for three consecutive working days, as well as any dangerous event that may put health and safety of the employees at risk.

The Borrower will inform the Bank within 48 hours about any incident or accident related to the project which has or is likely to have a significant adverse effect on the environment, the affected communities, the public or workers (labor, SEA/SH, health and safety, or security incident, accident, or circumstance). Such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members or property damage. The Borrower will prepare a report on the event and the corrective action and submit to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.

The contractors will be required to provide the periodic information on the performance in terms of labor, occupational health and safety issues. The information will be included in the construction contractor's

monthly report and will be reviewed by the supervision consultant's team. Additionally, the contractor shall report to the Borrower about any inspections and audits carried out by the respective ministries such as the Labor Inspection. The findings of the labor audits will be presented to the Borrower and the Bank, if requested.

9 AGE OF EMPLOYMENT

The minimum working-age in this project will be 18 years of age. The national legislation prohibits child labor. Persons under the age of 18 years will not be allowed to be engaged in hazardous work. Therefore, child labor risks are not expected in relation to the project. For further details on the project's risks related to ESS2 and other Environmental and Social Standards, please refer to the ESRS document available at [this link](#). However, despite the absence of such risks, contractors will still be required to take necessary steps to verify the identity and age of all workers to ensure compliance with this requirement. Contractors are expected to implement the following measures: workers must provide official documentation to verify age, such as a national identification card, passport, driver's license, birth certificate, or valid medical or school records..

If a child under the minimum age (18 years) is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child.

10 TERMS AND CONDITIONS

The terms and conditions applicable to the IPCU employees are outlined in IPCU's Human Resources Policy, which ensures the rights of its employees in line with the Turkish Labor Law (Law No. 4857) and the Civil Servants Law. These internal labor rules and regulations will apply to IPCU employees assigned to the project as direct workers. ESS2 requirements related to Occupational Health and Safety (OHS) and the prohibition of child and forced labor will also apply to civil servants working on the project.

For direct workers employed as consultants, the terms and conditions of their employment will be determined by their individual contracts, prepared in accordance with the Labor Code. The working hours for direct workers, including IPCU employees and all project workers, are set at 45 hours per week. Workers are entitled to at least one rest day (24 hours) following six consecutive days of work. The daily working hours may extend up to a maximum of 11 hours, provided that the total working hours do not exceed 45 hours per week. In line with Turkish law, the total overtime hours are limited to 270 hours annually. Employees are entitled to rest breaks as follows: 15 minutes for less than 4 hours of work, 30 minutes for 4 to 7.5 hours of work, and 60 minutes for more than 7.5 hours of work. Overtime hours will be capped at 270 hours annually and require written consent from workers, as per the Labor Code.

Employees working more than seven and a half hours per day are entitled to a minimum 60-minute break. Those working less than four hours are entitled to a 15-minute break, while employees working between four and seven and a half hours are entitled to a 30-minute break. Employees are also entitled to a paid uninterrupted 24-hour weekly rest period, usually on Sundays. However, employers may designate an alternative day if required by the nature or organization of work.

Project workers will have the right to annual, sick, and parental leave as outlined in the Labor Code of Türkiye. All wages, social security benefits, unused leave, pension contributions, and any other entitlements will be paid on or before the termination of the employment contract. Notice periods will comply with the Turkish Labor Code.

The contractors' labor management plan (LM Plan) will detail the terms and conditions for contracted workers. These conditions must align with this Labor Management Procedure, Turkish Labor Law, and the General Conditions of the World Bank Standard bidding documents. Employment contracts between contractors (employers) and workers will adhere to Turkish legal requirements and include details such as job descriptions, working hours, working conditions, and wage levels (including payment for overtime). All contracts will explicitly state that workers must be 18 years of age or older. In addition to written contracts, an oral explanation of the terms and conditions will be provided to workers who may face challenges in understanding the documentation. Contractors must also ensure clear communication among subcontractors and address potential language differences proactively. Workers will also receive information on the drug and alcohol policy and the Workers' Code of Conduct. A copy of the employment contract will be signed by both parties, and the worker will retain a copy. Employers may request overtime work, not exceeding 270 hours annually, with the worker's consent secured in January each year, as stipulated by the Labor Code.

The contractors must adopt this Labor Management Procedure as part of their contracts and ensure the terms and conditions for their workers comply with this procedure, the Turkish Labor Law (Law No. 4857), the Occupational Health and Safety Law (Law No. 6331), and the General Conditions of the World Bank Standard Procurement Documents (SPDs).

The project and IPCU encourage the recruitment of unskilled labor from affected communities, settlements, and neighborhood where feasible. Recruitment processes are expected to be transparent, public, and non-discriminatory, ensuring equal opportunity for all individuals, regardless of ethnicity,

religion, sexual orientation, disability, or gender. In such employment, contractors are required to provide necessary training to these workers to enhance their skills and ensure effective participation in project activities.

11 GRIEVANCE MECHANISM

The GM is a critical system to address comments, suggestions, concerns, and complaints from stakeholders, beneficiaries, communities and workers regarding Project activities. It enhances transparency, accountability, and stakeholder participation, ensuring timely resolutions and compliance with ESS2 and ESS10 standards. Description of the Project Level GM to be maintained during the project implementation is summarized in the project SEP (available [here](#)).

In addition to project's GM, the ESS 2 requires establishment of a WGM for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. Details of the WGM is provided in Section 11. 1.

11.1 Worker's Grievance Mechanism

The IPCU will develop and implement a grievance mechanism for direct workers to address workplace concerns. The grievance mechanism will be established by the beginning of the project implementation and will be maintained over the life of the project.

IPCU will require contractors to develop and implement a grievance mechanism for their workforce (contracted workers) including sub-contractors, prior to the start of works. The construction contractors will prepare their labor management plans before the start of civil works, which will also include detailed description of the workers grievance mechanism.

Before the commencement of works, IPCU, in collaboration with the Supervision Consultant, will establish a formal grievance mechanism ensuring accessibility through multiple channels. These channels will include comment/complaint forms, suggestion boxes, email addresses, a telephone hotline, and a designated focal point department.

The grievance mechanism will adhere to the following principles:

Transparency – allowing workers to freely submit grievances without fear of retaliation.

Confidentiality – ensuring grievances are handled by authorized personnel only.

Fair resolution – addressing complaints within 15 working days to ensure equitable outcomes.

Accessibility – providing multiple submission channels to facilitate easy reporting.

Non-retaliation – ensuring complainants do not face any discrimination or adverse actions.

The grievance mechanism will be described during staff induction training provided to all project workers. When a grievance is received, the IPCU will confirm its receipt within two (2) business days and provide the complainant with information regarding response timelines and next steps.

All grievances will be recorded in the grievance log, including those received by supervisors, project managers, or any management staff. The mechanism will include a dedicated procedure to address complaints related to workplace harassment and sexual harassment. This grievance process will be operated by trained staff, with all complaints securely stored in a data-protected database.

Information about the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, suggestion/complaint boxes, and other accessible means.

GM Focal Points will be trained to effectively operate the grievance mechanism while ensuring confidentiality.

11.2 Grievance Management Roles and Responsibilities

The IPCU will assign a social expert responsible for overseeing the grievance mechanism (GM), ensuring compliance with project LMP and national labor laws, as well as monitoring the effectiveness of grievance resolution. The social expert will analyze trends and maintain a central grievance database to track all grievances and resolutions.

Contractors and Supervision Consultants will be responsible for collecting and addressing grievances at their respective levels, ensuring that all cases are handled appropriately. They will submit regular reports to IPCU, summarizing grievance trends and resolutions.

Grievances can be submitted through multiple channels, including comment/complaint forms, suggestion boxes, email addresses, a telephone hotline, and a designated focal point department, ensuring accessibility and confidentiality for all workers.

Monitoring and Reporting

Contractors and Supervision Consultants will submit monthly reports to IPCU, summarizing trends, unresolved grievances, resolution timelines, and corrective actions taken. These reports will contribute to the Quarterly Environmental and Social Monitoring Reports prepared by IPCU. The quarterly reports will summarize key grievance trends, response timelines, and the satisfaction levels of complainants.

Grievances data, particularly related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and working conditions, will be shared with the World Bank while ensuring strict confidentiality and anonymization where necessary.

The IPCU will monitor grievance handling, ensuring:

- **Timely Resolution:** Grievances are addressed within 15 working days.
- **Fair Outcomes:** Corrective actions are acceptable to all parties.
- **Transparency:** Complainants are informed of resolutions and outcomes.
- **Confidentiality:** Information is protected and not shared with third parties.

11.3 Key Features of Sexual Exploitation and Abuse/Sexual Harassment Management in the Grievance Mechanism

The GM will be specifically designed to safely and ethically manage Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints, ensuring a survivor-centered approach that prioritizes dignity, confidentiality, and safety. The project's GM will also ensure accountability and transparency in handling SEA/SH complaints while complying with national legal frameworks and international good practices.

Confidential Reporting Channels:

- A dedicated hotline and email address for SEA/SH grievances will be established to ensure confidentiality.
- Suggestion/complaint boxes at project sites will allow for anonymous reporting.
- In-person reporting will also be available through designated trained personnel at IPCU and contractor level.

Survivor-Centered Approach:

- Complaints will be received and documented in a manner that respects the survivor's dignity, safety, and confidentiality.
- Reporting will only proceed with the informed consent of the survivor.

Integration with National Referral Systems:

- If an SEA/SH grievance is reported, it will be immediately referred to the appropriate national referral system, including law enforcement or support services, as stipulated in Turkish national frameworks.
- Survivors will have the option to report directly to the police or access support services through the Ministry of Family and Social Services.

Trained Personnel:

- Staff handling SEA/SH complaints will receive specialized training in survivor-sensitive approaches and ethical documentation.
- Personnel will ensure that survivors are informed of their rights, support services, and available legal options.

Safe Documentation and Reporting:

- All details of SEA/SH complaints will be logged in a secure grievance database accessible only to authorized personnel.
- Complaints will be tracked separately to maintain confidentiality and allow for accurate reporting of trends without identifying individuals.

11.3.1 Steps for Handling SEA/SH Complaints:

- Receipt of Complaint:** SEA/SH complaints can be submitted through multiple GM channels, including hotline, email, in-person reporting, or complaint boxes. The complainant will be informed of the confidentiality of the process and available support services.
- Initial Assessment and Immediate Response:** The complaint will be assessed promptly to determine urgency. Following the initial assessment, if deemed necessary, the survivor will be referred to medical, legal, and psychological support services within 24 hours.
- Referral to National Systems:** If the complaint qualifies as SEA/SH under Turkish law, it will be promptly referred to the national referral system, including law enforcement and relevant support services.
- Resolution and Feedback:** Survivors will be informed of the actions taken and any resolutions achieved, ensuring the survivor's informed consent and safety remain a priority throughout the resolution process.
- Monitoring and Reporting:** IPCU will monitor the implementation of SEA/SH grievance handling and include qualitative and quantitative data in biannual reports to the World Bank. All collected data, especially related to SEA/SH complaints, will be anonymized to ensure the confidentiality of survivor identities before being shared in biannual reports to the World Bank.

11.3.2 Awareness-Raising:

- Awareness-raising activities will include notice boards at worksites, GM sessions during staff induction and ongoing training, distribution of printed materials such as brochures and posters, and digital access through the project website.
- Stakeholders, including workers, will be informed about SEA/SH reporting channels and procedures through multiple communication methods, including induction training, notice boards, and project materials.
- Awareness campaigns will reinforce workplace behavior expectations and promote the project's zero-tolerance policy for SEA/SH incidents.

12 CONTRACTOR MANAGEMENT

The IPCU will adopt the World Bank's 2023 Standard Procurement Documents (SPD) for solicitations and contracts. These documents include comprehensive labor and occupational health and safety (OHS) requirements, ensuring alignment with ESS2 and Turkish labor laws.

As part of the process for selecting design consultants and contractors who will engage contracted workers, IPCU and/or the supervision consultant will review the following information:

- Public records, such as corporate registers and documents, related to labor law compliance, including reports from labor inspectorates and enforcement bodies.
- Business licenses, registrations, permits, and approvals.
- Documents related to labor management systems, including procedures for addressing OHS issues.
- Identification of labor management, safety, and health personnel, along with their qualifications and certifications.
- Workers' certifications, permits, or training records required to perform specific tasks.
- Records of safety and health violations, along with corrective measures taken.
- Accident and fatality records, including notifications to relevant authorities.
- Records of legally mandated worker benefits and evidence of worker enrollment in related programs (e.g., training records, vocational certificates, risk assessments).
- Worker payroll records, including details of hours worked and wages paid.
- Identification of safety committee members and records of their meetings.
- Copies of previous contracts with contractors and suppliers, ensuring the inclusion of provisions aligned with ESS2 and related terms.

Contracts with contractors will explicitly include provisions related to labor and OHS requirements as specified in the World Bank's SPDs and Turkish labor law. IPCU will use these SPD documents for all construction-related contracts, ensuring the inclusion of remedies for noncompliance with labor, environmental, social, and OHS requirements. Such remedies may involve withholding payments, contract termination, or forfeiture of all or part of the performance security related to environmental, social, and health and safety obligations.

The detailed process and contractual requirements will be accessible through the Project's official website¹.

Contractor Performance Monitoring

IPCU and/or its supervision consultant will manage and monitor contractor performance regarding compliance with contractual obligations related to labor management. This will include regular audits, inspections, and spot checks of sub-project locations and work sites, as well as labor management records and reports maintained by contractors.

Contractors will be required to maintain and provide access to labor management records and reports, which shall include:

¹ www.ipkb.gov.tr

- A representative sample of employment contracts or arrangements between contractors, subcontractors, and contracted workers.
- Records of grievances received from workers and their resolution status.
- Reports of safety inspections, including details of fatalities, incidents, and the implementation of corrective actions.
- Records of any incidents of non-compliance with Turkish labor law or project requirements.
- Training records detailing the sessions conducted for workers on labor and working conditions, as well as OHS requirements for the project.

13 PRIMARY SUPPLY WORKERS

The IPCU will oversee the procurement of goods and materials required for civil works under the project.

Primary suppliers will be required to meet the ESS2 requirements, which will be specified and guided in the contractual agreements between IPCU and suppliers.

Project contractors will be responsible for the procurement and supply of materials and equipment, ensuring compliance with Environmental, Social, Health, and Safety (ESHS) standards and conditions outlined in their contracts. Specific requirements on child labor, forced labor, and OHS standards will be included in all procurement orders and contracts with suppliers.

The primary suppliers for the sub-projects are expected to be companies manufacturing concrete, safety equipment, gravel, sand, cement, granite, andesite, iron, fixtures, wooden doors, PVC windows, laminate flooring, lighting, rockwool, paint, and other construction related materials. These sectors are generally not associated with significant risks of child labor or forced labor. For backfilling or reinstatement materials, local quarries may also be engaged as primary suppliers. Aside from local quarries, the primary suppliers are expected to be large-scale national companies with robust compliance frameworks.

When local suppliers are engaged, contractors will conduct due diligence to identify potential risks, such as the exploitation of child or forced labor or exposing workers to significant safety hazards. Local suppliers will undergo necessary audits and controls to ensure they provide safe working conditions in compliance with local legislation and ESS2. Contractors are required to take corrective measures should any risks be identified.

For foreign suppliers, contractors must inquire during the procurement process whether the supplier has faced accusations or sanctions related to child labor, forced labor, or safety violations. They will also assess the supplier's corporate policies on these issues. If any significant risks are identified, contractors will notify IPCU and may avoid such suppliers where possible.

To ensure compliance, the IPCU will mandate the use of the World Bank's Standard Procurement Documents (SPD) for construction contracts, which include provisions for remedies in cases of non-compliance. Remedies may include corrective actions, withholding payments, termination of contracts, and enforcement of penalties.

The IPCU will oversee regular audits and inspections of suppliers to ensure compliance with contractual agreements and labor standards. This approach ensures the ethical and safe procurement of materials and equipment, while aligning with both national laws and the World Bank's standards on labor and OHS.

ANNEX 1: Grievance Registration Form**İSTANBUL DİRENÇLİLİK PROJESİ /****ISTANBUL RESILIENCE PROJECT****ŞİKAYET KAYIT FORMU / GRIEVANCE REGISTER FORM**

Şikayetin Alındığı Yer/ Location of Complaints Received		Tarih/ Date
Alan Yetkilinin Adı/ Name of Person in Charge		Şikayet Kayıt No/ Complaint Register Number
Şikayete Konu Alanın Koordinatları/ Coordinates of The Area Subject To Complaint		
ŞİKAYET SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO		
Şikayet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. / The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond.		
Ad Soyad/ Name Surname		Şikayetin Geliş Yolu / Form of Complaint:
TC Kimlik No/ Identification Number		Telefon- Ücretsiz hat / Phone –Free phone line <input type="checkbox"/>
Telefon/ E-Posta Telephone/ E-mail		İstişare Toplantısı/ Consultation meeting <input type="checkbox"/>
Mahalle-Köy-İlçe-İl/ Neighborhood-Village –District - Province		Dilekçe / Petition <input type="checkbox"/>
ŞİKAYET DETAYLARI / DETAILS OF COMPLAINT		
Şikayet Konusu / Complaint		
Şikayet sahibi tarafından talep edilen çözüm / Solution requested by the Complainant		
Şikayeti Alan Yetkilinin Ad Soyad ve İmzası / Şikayet Sahibinin Ad Soyad ve İmzası / Name Surname and Signature of the Registerer Name Surname and Signature of Complainant		

ANNEX 2: Grievance Close Out Form

İSTANBUL DİRENÇLİLİK PROJESİ /

ISTANBUL RESILIENCE PROJECT

ŞİKAYET KAPATMA FORMU / GRIEVANCE CLOSURE FORM

Şikayet Kapatma Numarası: Grievance Closure No:	
Alınması Gereken Acil Önlemleri Tanımlayın: Identify the urgent actions	
Alınması Gereken Uzun Vadeli Önlemleri Tanımlayın (Gerekli ise): Identify the long term actions (if necessary)	
Tazminat Talebi Bulunuyor Mu? Is there a claim for compensation?	Evet/Yes <input type="checkbox"/> Hayır/No <input type="checkbox"/>
DÜZELTİCİ FAALİYETİN KONTROLÜ VE KARARI / CONTROL AND DECISION OF CORRECTIVE ACTION	
Düzeltilici Faaliyetin Aşamaları Stages of Corrective Action	Verilen Sürenin Sona Erdiği Tarih ve Yetkili Kuruluşlar Date of Expiration of the Given Period and Authorized Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

ANNEX 4: Code of Conduct

As the Contractor, *[insert the name of the Contractor]*, we have signed a contract with *[Employer's name will be inserted]* for *[job name and description to be entered]*. These works will also be carried out at *[insert the names of the construction sites and other locations where the works will be done]*. The contract obliges us to take measures to address environmental and social risks associated with work, including the risks of sexual exploitation, abuse, and gender-based discrimination.

This Code of Conduct (CoC) is part of the measures we take to mitigate environmental and social risks associated with work. It applies to all our employees at the site or other places where work is executed. Additionally, this CoC applies to the personnel of each subcontractor and other personnel who assist us in executing the works. All such personnel are called "Contractor's Personnel" and are subject to this CoC.

This CoC defines the required behavior of personnel identified as "Contractor's Personnel."

We commit to maintaining a safe working environment where unsafe, abusive, or violent behavior will not be tolerated, and all individuals can express their problems or concerns without fear of retaliation.

Required Conduct

Contractor's Personnel shall:

1. Carry out their duties competently and diligently.
2. Comply with this CoC and all applicable laws, regulations, and other requirements, including those protecting the health, safety, and well-being of the Contractor's personnel and any other person.
3. Organize a safe working environment, including:
 - Ensuring that workplaces, machinery, equipment, and processes under each person's control are safe and do not pose a health risk.
 - Using/wearing necessary personal protective equipment (PPE).
 - Using appropriate measures regarding chemical, physical, and biological substances and agents.
 - Following applicable emergency operations procedures.
4. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health.
5. Treat all individuals with respect and avoid discrimination based on gender, disability, ethnicity, or other characteristics.
6. Avoid and report all forms of sexual harassment, including unwelcome sexual advances, request for sexual favours, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's personnel.

7. Avoid sexual exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including abuse of positions of power for sexual purposes or benefits.
8. Avoid sexual assault, which means any form of non-consensual sexual contact that does not result in or include penetration.
9. Avoid any form of sexual activity, abuse, or inappropriate behavior towards children, which includes actions that compromise their safety or well-being within project areas.
10. Complete mandatory training on environmental, social, and OHS-related aspects of the contract, including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).
11. Engage respectfully with local communities, considering their cultural traditions and norms, and avoid any behavior that could be perceived as inappropriate or offensive.
12. Use designated sanitary facilities and adhere to environmental norms, avoiding any actions that could harm the environment.
13. Avoid conflicts of interest, including granting preferential treatment, contracts, or benefits to individuals with financial, familial, or personal connections.
14. Ensure the protection and proper use of property, avoiding theft, carelessness, or waste.
15. Report any violations of this CoC.
16. Avoid hostility towards anyone reporting a violation of this CoC or using the [Project GM].

Reporting Violations

Personnel must immediately report any behavior they believe violates this CoC, without fear of retaliation, and such reports will be protected and taken seriously if made in good faith.. This can be done by:

- Contacting [insert the name of the Contractor's Social Specialist designated for addressing gender-based discrimination] via phone [insert number], in writing [insert email address], or in person.
- Calling the Contractor's hotline [insert number] and leaving a message.

All reports will be treated confidentially unless reporting is required by law. Anonymous complaints will be appropriately addressed. Reports of potential abuse will be taken seriously, and immediate support will be provided to survivors, including access to services and guidance.

Hostility towards individuals raising concerns is prohibited and constitutes a violation of this CoC.

Consequences of Violations

Violations of this CoC by Contractor Personnel may result in serious consequences, including job termination and potential referral to legal authorities.

Signature and Acknowledgment

For Contractor Personnel: I have received a written copy of this CoC in a language I understand. A copy of this CoC will be displayed in prominent locations at the project site, and all Personnel will receive training on its contents. If I have any questions, I will contact *[insert the name of the Contractor's Social Specialist]*.

Contractor Personnel Name: _____

Signature: _____

Date: _____

For the Authorized Contractor Representative:

Signature: _____

Date: _____