



DALGAKIRAN MACHINE

Production Facilities and Offices

Environmental and Social Management Plan (ESMP)

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1. GENERAL

Environmental and Social Management Plan (ESMP) has been prepared for the completion of the studies carried out for the evaluation of Environmental and Social Impacts in Dalgakiran Industry and Trade Inc. (hereinafter referred to as the 'COMPANY') in accordance with the National Environmental, Social, Occupational Health and Safety Regulations, IFC Performance Standards (PSs), World Bank Environmental and Social Standards (ESS) and Turkey Development and Investment Bank (TDIB) Environmental and Social Policy.

1.1. General Information

COMPANY is among the leading industrial screw and reciprocating compressor manufacturers and exporters in Turkey in the compressed air sector. Wide product range, strong production infrastructure, domestic regional offices, overseas main offices, and distributor networks have been established and today it exports to more than 130 countries.

COMPANY products listed under two main titles. These are:



Shape 1: Products

The production facility of the COMPANY, located in Kocaeli Province Dilovası District Makine İhtisas Organized Industrial Zone, is located on an open area of 48,562 m², a production facility of 40,150 m² and an administrative building of 4,100 m² and a total closed area of 44,250 m².



Picture 1: Dilovası Production Facility



Picture 2: Organized Industrial Zone and Production Facility Location

The Administration Building, located in the Sancaktepe District of Istanbul Province, is located on an open area of 10,310 m² and a closed area of 6.325 m².



Picture 3: Management Building

The sales and service office in Ankara, Yenimahalle District, OSTİM, provides service in a closed area of 613 m².



Picture 4: Ankara Sales and Services Office

The sales and service office, located in Bornova District of Izmir Province, serves in a closed area of 750 m².



Picture 5: Izmir Sales and Services Office

COMPANY was certified according to ISO 9001 Quality Management System, ISO 14001 Environmental Management System, ISO 45001 Occupational Health and Safety Systems, ISO 27001 Information Security Management System, ISO 13485 Medical Devices Management System, Healthy Work Place, EN ISO 3834 Welded Manufacturing Qualification Requirements, EN 15085-2 Welded Manufacturing Qualification Requirements for Railway Vehicles, ASME SEC VIII Div 1 which are given by institutions accepted as authority in Turkey and in the world.

The COMPANY has many quality certificates and systems such as Turkish Loyd and French Loyd, Marine Type Approval Certificates, EN 286-1, EN 286-3, CE and Product Safety Certification, TSE, TSEK, GOST-R, UKRSEPRO, Nuclear Conformity Assessment and TURQUM.

The COMPANY plans to use the related loan as a working capital loan.

1.2. ESMP Purpose

Environmental and Social Management aims to consistently predict and eliminate the risks and effects that the COMPANY may face to prevent potential risks from turning into real problems, in line with national legislation and international standards.

Applicable national legislation and international standards determined within the scope of the COMPANY are listed in the ESMP. Responsible parties for the measures to be taken were also determined, and a framework for the institutional structure was established.

This plan has been developed in line with the following principles:

- ✓ To manage the COMPANY activities in accordance with the legal framework directives specified in article 1.4,
- ✓ Evaluating the environmental and social impacts on the affected people and communities because of the COMPANY activities, developing and implementing preventive and mitigating measures to eliminate the social and environmental negative impacts, and if this is not possible, to minimize them,
- ✓ In cases where there are inevitable effects because of COMPANY activities, developing the necessary plans to regulate the negative effects and drawing the main frame,
- ✓ To define the necessary roles and responsibilities and actions to respond to the environmental and social problems that may arise because of the COMPANY activities,
- ✓ Ensuring that the ESMP is feasible and cost effective,

- ✓ Fulfilling the function of a guide document to ensure the correct management of the environmental and social impacts of the COMPANY, and the implementation of the measures, and to monitor it,
- ✓ Developing methods and mechanisms that will enable grievances to be resolved within the scope of the Stakeholder Engagement Plan, which aims to address the concerns of all stakeholders.

1.3. ESMP Scope

This Environmental and Social Management Plan (ESMP) prepared for the Production Facility, Administration Building and Ankara and Izmir Regional Offices subordinated to the COMPANY, covers the environmental and social risks specific to the operational periods of the facility and offices, covers the mitigation measures that must be taken in order to be managed effectively by complying with the National Environmental Legislation, the Development and Investment Bank of Turkey, Environmental and Social Policy, IFC Performance Standards and World Bank Environmental and Social Standards (ESS).

Stakeholder participation to be carried out within the scope of the studies, occupational health and safety, wastewater and waste management processes, details of the complaint mechanism to be created, Stakeholder Engagement Plan (SEP), Occupational Health and Safety (OHS) Management Plan (OHS YP), which are individual documents, Presented with Waste Management Plan and Wastewater Management Plan.

1.4. Legal Frame

1.4.1. National Legislation Requirements

This ESMP was prepared to meet requirements of the following main national environmental and social policies and legislation.

Legal Regulations Regarding Social and Occupational Health and Safety	
Rg Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
10.06.2003 / 25134	Labor Law
16.06.2006 / 26200	Social Insurance and General Health Insurance Law
08.09.1999 / 23810	Unemployment Insurance Law
07.04.2016 / 6698	Personal Data Protection Law

Legal Regulations Regarding Social and Occupational Health and Safety	
Rg Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
30.06.2012 / 28339	Occupational Health and Safety Law
24.07.2013/ 28717	Manual Handling Regulations
25.04.2013/ 28628	Regulation on Health and Safety Conditions in the Use of Work Equipment
28.07.2013/ 28721	Regulation on Protection of Employees from Risks Related to Noise
22.08.2013 / 28743	Regulation on Protection of Employees from Vibration-Related Risks
02.07.2013 / 28695	Regulation on the Use of Personal Protective Equipment at Workplaces
15.06.2013/ 28678	Regulation on Prevention of Exposure Risks to Biological Factors
21.09.2006 / 26312	Law Regarding Some Regulations Regarding Vocational Qualifications Authority
05.10.2013 / 28786	Occupational Health and Safety Regulation in Construction Works
30.12.2013 / 28867	Regulation on Preventing Major Industrial Accidents and Reducing Their Effects
15.05.2013 / 28648	Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees
30.04.2013 /28633	Regulation on the Protection of Employees from the Hazards of Explosive Environments
06.04.2004 / 25425	Regulation on the Procedures and Principles of Employing Child and Young Workers
16.04.2013 / 28620	Regulation on Health and Safety Precautions in Working with Displayed Vehicles
18.01.2013 / 28532	Regulation on Occupational Health and Safety Committees
29.12.2012 / 28512	Occupational Health and Safety Risk Assessment Regulation
05.11.2013 / 28812	Dust Fighting Regulation
13.07.2013 / 28706	Regulation on the Vocational Training of Persons to be Employed in the Dangerous and Very Dangerous Classes
11.09.2013 / 28762	Health and Safety Signs Regulation
12.08.2013 / 28733	Regulation on Health and Safety Precautions in Working with Chemical Substances
18.06.2013 / 28681	Regulation on Health and Safety Precautions in Working with Chemical Substances
17.07.2013 / 28710	Regulation on Health and Safety Measures to be Taken in Workplace Buildings and Attachments
19/12/2007/ 26735	Regulation on Fire Protection of Buildings
29.08.2013 / 28750	Communiqué on Qualifications and Election Procedures and Principles of Employee Representatives Related to Occupational Health and Safety
1930 / 1593	Public Health Law
27.08.2020 / 31226	First Aid Regulation
10.03.2021 / 31419	Remote Work Regulation

Table 1: Legal Regulations Regarding Social and Occupational Health and Safety

LEGAL REGULATIONS REGARDING ENVIRONMENT	
Rg Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
1983 / 2872	Environmental Law
25.11.2014 / 29186	Environmental Impact Assessment Regulation
10.09.2014 / 29115	Environmental Permit and License Regulation
21.11.2008 / 27061	Environmental Audit Regulation
02.04.2015 / 29314	Waste Management Regulation
27.12.2017 / 30283	Packaging Waste Control Regulation
30.07.2008 / 26952	Waste Oil Control Regulation
31.08.2004 / 25569	Regulation on Control of Waste Batteries and Accumulators

LEGAL REGULATIONS REGARDING ENVIRONMENT	
Rg Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
25.01.2017 / 29959	Regulation on Control of Medical Wastes
25.11.2006 / 26357	Regulation on Control of End-of-Life Tires
22.05.2012 / 28300	Waste Electrical and Electronic Equipment Control Regulation
17.06.2011 / 27967	Communiqué on Recovery of Some Non-Hazardous Wastes
06.06.2015 / 29378	Regulation on Control of Waste Vegetable Oils
18.03.2004 / 25406	Regulation on Control of Excavated Soil, Construction and Demolition Wastes
12.07.2019 / 30829	Zero Waste Regulation
31.12.2004 / 25687	Water Pollution Control Regulation
1960 / 167	Law on Groundwater
07.04.2012 / 28257	Regulation on the Protection of Groundwater against Pollution and Deterioration
08.06.2010 / 27605	Regulation on Control of Soil Pollution and Point Source Contaminated Sites
03.07.2005 / 25880	Soil Conservation and Land Use Law and Related Regulations
04.06.2010 / 27601	Regulation on Evaluation and Management of Environmental Noise
30.12.2006 / 26392	Regulation on Noise Emission in the Environment Created by Outdoor Equipment
03.07.2009 / 27277	Industrial Air Pollution Control Regulation
19.07.2013 / 28712	Regulation on the Control of Odor-Creating Emissions
06.06.2008 / 26898	Air Quality Assessment and Management Regulation
17.05.2014 / 29003	Regulation on the Monitoring of Greenhouse Gas Emissions
11.03.2017 / 30004	Exhaust Gas Emission Control Regulation
21.11.2013 / 28828	Regulation on Environmental Officer, Environmental Management Unit and Environmental Consulting Firms
13.12.2014 / 29204	Regulation on Safety Data Sheets Regarding Harmful Substances and Mixtures
12.10.2014	Turkish Penal Code No. 5237
02.03.2019 / 30702	Regulation on Preventing Major Industrial Accidents and Reducing Their Effects
27.10.2011 / 28097	Regulation on Increasing Efficiency in the Use of Energy Resources and Energy
18.06.2022 / 31870	Regulation on Dangerous Goods Safety Consultancy Services
22.05.2014 / 29007	Communiqué on Dangerous Goods Safety Consultancy
11.06.2019 / 44011	Directive on the Procedures and Principles Regarding the Issuance of Dangerous Goods Activity Certificate
19.07.2003 / 25173	Road Transport Law
06.07.2015 / 29418	Regulation on the Transport of Dangerous Goods by Rail
13.04.2018 / 30390	Regulation on the Transport of Dangerous Goods by Air
20.03.2015 / 29301	Communiqué on the Transport of Wastes on the Road

Table 2: Legal Regulations Regarding Environment

LEGAL REGULATIONS REGARDING GEOLOGY AND SEISMISITY	
RG Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
06.03.2007 / 26454	Regulation on Buildings to be Constructed in Earthquake Zones

Table 3: Legal Regulations Regarding Geology and Seismicity

LEGAL REGULATIONS ON NATURE PROTECTION	
RG Date/Nr	Law/Legislation/ Code/Notice/Legislation Name
09.08.1983 / 2873	National Parks Law
01.07.2003 / 4915	Land Hunting Law
05.06.1986 / 6831	Forest Law
17.04.1990 / 20495	Coastal Law
03.08.1990 / 20594	Regulation on the Implementation of Coastal Law

Table 4: Legal Regulations on Nature Protection

1.4.2. International Standard Regulations

IFC Performance Standards (PS), World Bank Environmental and Social Standards (ESS) and were considered account in the process of preparing an ESMP that is commensurate with the scope of the COMPANY, environmental and social risks, and impacts.

1.4.2.1. IFC Performance Standard Regulations

This Plan: It has been prepared in accordance with the International Finance Corporation (IFC) *Environmental and Social Performance Standards (PS)*, *IFC General EHS Guidelines* and *Metal Product Manufacturing IFC Performance Standards Environmental and Social Management System Implementation Manual*. The 2012 version of the IFC Sustainability Framework, which includes these PSs, is applicable to all investment and advisory clients going through IFC's initial credit review process as of January 1, 2012. IFC Environmental and Social Performance Standards are listed below and detailed in Table 5.

PS1	Evaluation and Management of Environmental and Social Risks and Impacts
PS2	COMPANY and Working Conditions
PS3	Resource Efficiency and Pollution Prevention
PS4	Community Health, Safety and Security
PS5	Land Acquisition and Forced Resettlement
PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources
PS7	Indigenous Peoples
PS8	Cultural Heritage

Table 5: IFC Environmental and Social Performance Standards

1.4.2.2. World Bank Environmental and Social Standards

The World Bank Environmental and Social Framework (ESF) sets the World Bank's commitment to sustainable development through a Bank Policy and a set of Environmental and Social Standards (ESS) designed to support spending projects. The ESOs set out requirements for companies to identify and assess the environmental and social risks and impacts associated with Bank-sponsored projects. These standards are:

- Supporting projects to reach good international practices regarding environmental and social sustainability,
- Assisting projects in fulfilling their national and international environmental and social obligations,
- Improving non-discrimination, transparency, participation, accountability, and governance,
- It aims to improve the sustainable development results of projects with ongoing stakeholder participation.

10 ESS details the standards that the Borrower and the project will meet throughout the project lifecycle in Table 6.

ESS1	Assessment and Management of Environmental and Social Risks and Impacts
ESS2	Labor and Working Conditions
ESS3	Resource Efficiency, Pollution Prevention and Management
ESS4	Community Health and Safety
ESS5	Land Acquisition, Land Use Limitations, and Involuntary Resettlement
ESS6	Conservation of Biodiversity and Sustainability Management of Living Natural Resources
ESS7	Indigenous Peoples / Sub-Saharan Africa Historically Ignored Traditional Indigenous Communities
ESS8	Cultural heritage
ESS9	Financial Intermediaries
ESS10	Stakeholder Engagement and Disclosure of Information

Table 6: World Bank Environmental and Social Standards

Out of 10 Environmental Social Standards, the following 9 environmental social standards (Environmental Social Standards 7 are not included because they are not relevant) determine the standards that the Company will meet.

1.4.2.2.1. ESS1: Assessment and Management of Environmental and Social Risks and Impacts

The World Bank requires that the environmental and social risks and impacts of Bank-sponsored projects be assessed, managed, and monitored to ensure that projects are environmentally and socially sound and sustainable.

ESS1 targets:

1. Identify, assess, and manage the Company's environmental and social risks and impacts consistent with the EHSs,
2. a) Anticipating and avoiding risks and impacts,

b) Reducing or minimizing risks and impacts to acceptable levels where avoidance is not possible,

c) Mitigate after risks and impacts are minimized or reduced,

d) Adopt the mitigation hierarchy approach where significant residual effects remain, to compensate or offset them where technically and financially feasible.
3. To take differentiated measures so that adverse impacts are not disproportionately reflected on disadvantaged or vulnerable groups and that these groups are not disadvantaged in sharing the development benefits and opportunities arising from the project,
4. Use national environmental and social institutions, systems, laws, regulations, and procedures, where appropriate, in the evaluation, development and implementation of projects to achieve objectives that are substantially consistent with the ESSs,
5. Promote improvement of environmental and social performance in ways that recognize and enhance the Company's capacity.

Pursuant to the requirements of ESS1, the Company's key responsibilities are as follows.

- Carrying out an environmental and social assessment of the Company to identify, assess and manage potential environmental and social risks and impacts,
- Undertake stakeholder engagement and disclose appropriate information in accordance with ESS10.
- Developing an Environmental and Social Management plan and implementing all measures and actions specified in the legislation, including ESMP.

- Monitoring and reporting on the environmental and social performance of the Company according to the ESS.

1.4.2.2.2. ESS2: Labor and Working Conditions

The objectives of the ESS2 are:

1. To promote occupational safety and health,
2. To promote fair treatment, non-discrimination, and equal opportunity for Company employees,
3. Appropriately protect workers, including women, persons with disabilities, children (of working age in accordance with ESS2) and vulnerable workers such as migrant workers, contract workers, community workers and primary supply workers,
4. To prevent all kinds of forced labor and child labor,
5. To support the principles of the right of project workers to unionize and collective bargaining, consistent with national laws,
6. Providing accessible tools for Company employees to voice their workplace concerns.

The applicability and scope of application of ESS2 will depend on the environmental and social assessment describes in ESS1 and the type of employment relationship between the Company and its employees.

HOW2 requirements; It covers the development and implementation of written workforce management procedures that will apply to the project. These procedures will define the different categories of Company employees, set out how to manage Company employees in accordance with the requirements of national law and this EHS, and include a description of the following:

- Terms and conditions of employment, non-discrimination, and equality of opportunity, and working conditions and management of worker relations, including workers' organizations,
- Labor protection, including defining a minimum age for workers and prohibiting child and forced labor,
- Grievance mechanism (for employees),

- Occupational health and Safety. Reasonable efforts will be made to ensure that third parties employing contract workers have workforce management procedures that will enable them to operate in accordance with the relevant sections of the EHS2, and such requirements will be incorporated into contractual agreements with appropriate non-compliance resolutions. If the Company employs community workers, measures will be implemented to determine whether such labor is provided on a voluntary basis or as part of a community agreement, and the potential risks of child or forced labor will be assessed and the applicable requirements of the ESS2 will be implemented. For primary suppliers, potential workforce risks will be assessed and in case of significant risks, the primary supplier will be asked to implement relevant mitigation procedures and actions.

1.4.2.2.3. ESS3: Resource Efficiency and Pollution Prevention and Management

ESS3 targets are the following:

1. To promote the sustainable use of resources, including energy, water, and raw materials,
2. To prevent or minimize the negative effects on human health and the environment by minimizing the pollution caused by the project activities,
3. Prevent or minimize project-related emissions of short- and long-lived climate pollutants,
4. To prevent or minimize the generation of hazardous and non-hazardous waste,
5. To minimize and manage the risks and impacts associated with pesticide use.

The applicability of ESS3 is dependent on the environmental and social assessment described in ESS1.

Pursuant to the ESS3 requirements, the Company's key responsibilities are as follows.

- Resource efficiency, including use of energy, water, and raw materials and
- Prevention and management of pollution, including the management of air pollution, hazardous and non-hazardous wastes, chemicals and hazardous substances and pesticides.

1.4.2.2.4. ESS4: Community Health and Safety

ESS4 addresses potential health, safety and security risks and impacts on project-affected communities and Borrowers' responsibility to avoid or minimize them, with particular attention to vulnerable persons. The objectives of ESS4 are:

1. Anticipate and prevent adverse impacts on the health and safety of project-affected communities throughout the project lifecycle, resulting from both routine and non-routine situations,
2. Promote issues related to quality and safety and climate change in the design and construction of infrastructure, including dams,
3. To prevent or minimize public exposure to project-related traffic and road safety risks, diseases, and hazardous materials,
4. Take effective measures to deal with emergency events,
5. Ensuring that the protection of personnel and property is carried out in a way that prevents or minimizes risks to project-affected communities.

The applicability of ESS4 is depended on by the environmental and social assessment described in ESS1.

Pursuant to the requirements of ESS4, the Company's key responsibilities in the operating process are as follows.

- ✓ Infrastructure and equipment design and safety,
- ✓ Community health and safety, including safety of services, community exposure to health problems, management and safety of hazardous materials, and emergency preparedness and response,
- ✓ Security personnel.

1.4.2.2.5. ESS5: Land Acquisition, Land Use Restrictions, and Involuntary Resettlement

ESS5 targets are as follows:

1. Avoiding involuntary resettlement or, when unavoidable, minimizing involuntary resettlement by exploring project design alternatives.
2. Avoiding forced evacuation,
3. By reducing the inevitable negative social and economic impacts resulting from land acquisition or land use restrictions:
 - ✓ Providing timely compensation over replacement costs for loss of assets,

- ✓ Assist in efforts to improve or at least restore the livelihoods and living standards of displaced persons in real terms to pre-displacement levels or levels prior to the start of project implementation, whichever is higher.

Improving the living conditions of the physically displaced poor or vulnerable through the provision of adequate shelter, access to services and facilities, and property security.

Considering and executing resettlement activities as sustainable development programs, providing sufficient investment resources to ensure that IDPs directly benefit from the project as required by the nature of the project.

To ensure that resettlement activities are planned and implemented with appropriate information sharing, meaningful consultation, and informed participation of those affected.

The applicability of ESS5 is dependent on the environmental and social assessment described in ESS1 and applies to permanent or temporary physical and economic displacement resulting from land acquisition or land use restrictions undertaken or implemented in connection with the project implementation described in ESS5.

In accordance with the requirements of ESS5, the main responsibilities of the Company are as follows.

- General requirements such as community participation, grievance mechanism, planning and implementation,
- Cooperation with other responsible institutions or lower national jurisdictions.

1.4.2.2.6. EHS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

The objectives of ESS6 are:

1. To protect and preserve biodiversity and habitats,
2. To apply the mitigation hierarchy and precautionary approach in the design and implementation of projects that may have an impact on biodiversity,
3. To promote the sustainable management of living natural resources,
4. To support the livelihoods of local communities, including Indigenous Peoples, through the adoption of practices that integrate conservation needs with development priorities.

The applicability of ESS6 depends on the environmental and social assessment described in ESS1.

In accordance with the requirements of ESS6, the main responsibilities of the Company are as follows.

- General requirements, including assessment of risks and impacts, conservation of biodiversity and habitats (altered, natural and critical habitats), legally protected and internationally recognized areas of high biodiversity value, invasive alien species and sustainable management of living natural resources,
- Primary suppliers.

1.4.2.2.7. ESS 8: Cultural Heritage

ESS8 sets out the general provisions on the risks and impacts to cultural heritage arising from project activities. The objectives of ESS8 are:

1. To protect the cultural heritage from the negative effects of the project activities and to support its protection,
2. To treat cultural heritage as an integral aspect of sustainable development,
3. To encourage meaningful consultation with stakeholders on cultural heritage,
4. To promote the equitable sharing of the benefits derived from the use of cultural heritage.

The applicability of ESS8 depends on the environmental and social assessment described in ESS1.

In accordance with the requirements of ESS8, the main responsibilities of the Company are as follows.

- Stakeholder consultation and identification of cultural heritage, including confidentiality and stakeholder access,
- Legally protected cultural heritage sites,
- Provisions for certain types of cultural heritage, including archaeological sites and materials, built heritage, natural features of cultural significance and movable cultural heritage.

1.4.2.2.8. ESS9: Financial Instrument

Financial Intermediaries are responsible for monitoring and managing the environmental and social risks and impacts of the projects they finance. The objectives of ESS9 are:

- Determine how the Financial Institution will assess and manage the environmental and social risks and impacts associated with the subprojects it finances,
- Promote good environmental and social governance practices in sub-projects financed by the Financial Institution,
- To promote good environmental and sound human resource management within the Financial Institution.

In accordance with the requirements of ESS9, the main responsibilities of the Company are as follows.

- Environmental and social management system, including environmental and social policy, environmental and social procedures, institutional capacity and competence, monitoring, and reporting,
- Stakeholder engagement.

1.4.2.2.9. ESS 10: Stakeholder Engagement and Information Disclosure

Open and transparent participation between the borrower and project stakeholders is one of the key elements of good international practice, and effective stakeholder engagement improves the environmental and social sustainability of projects. The objectives of ESS10 are:

1. Establish a systematic approach to stakeholder engagement that will help borrowers identify stakeholders and establish and maintain a constructive relationship with them, especially the parties affected by the project,
2. To assess the level of interest and support of stakeholders for the project and to ensure that the opinions of stakeholders are get attention in project design and environmental and social performance,
3. Encourage and provide the tools for effective and inclusive participation with project-affected parties throughout the project lifecycle on issues that could potentially affect them,
4. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format,
5. To provide accessible and inclusive means for parties affected by the project to raise issues and complaints, and to allow Borrowers to respond to and manage such complaints.

The requirements of ESS10 cover the development of a stakeholder engagement framework and/or plan that will define:

- Participation during project preparation, including stakeholder identification and analysis, Stakeholder Engagement Plan, information sharing, and meaningful consultation,
- Participation during project implementation and external reporting,
- Grievance mechanism,
- Institutional capacity and commitment.

1.5. Target Users

ESMP is a guiding document on the way of programming for possible environmental and social impacts and necessary mitigation measures within the scope of COMPANY executives' activities.

The COMPANY will use this plan to ensure effective environmental and social management in accordance with the national and international requirements to which it is subject.

This plan will be published with the public via the COMPANY website in accordance with the legal framework requirements specified in article 1.4 and will be published in the QMAD program of the enterprise, which is used for the purpose of publishing documents to all employees.

1.6. Duties and Responsibilities

Chairman of the Executive Board and Member of the Board of Directors, Technical President, Human Resources Directorate and Quality Assurance Directorate (Occupational Health and Safety Specialist, Integrated Management System Specialist, Environmental consultant continue their activities under this roof.) The practices specified in this plan, their activities within the scope of the legal framework will do. Duties and responsibilities regarding the implementation of the ESMP are as follows.

Chief Executive Officer and Board Member
<p>*General responsibility for the implementation specified in the ESMP,</p> <p>*Ensuring that the COMPANY complies with the legal framework requirements described in the ESMP.</p>

Chief Executive Officer and Board Member
Chief Executive Officer and Board Member: Adnan DALGAKIRAN adnandalgakiran@dalgakiran.com

Table 7: Chief Executive Officer and Board Member Duties and Responsibilities

Technical President
<ul style="list-style-type: none">*Ensuring the implementation of ESMP requirements,*To carry out the monitoring process related to the implementation of the ESMP,*Preparing environmental and social monitoring reports to be submitted to the organizations subject to the contract. <p>Technical President: Emre KAHYA emre.kahya@dalgakiran.com</p>

Table 8: Technical President Duties and Responsibilities

Human Sources Directorate
<ul style="list-style-type: none">*Adopting and implementing the Stakeholder Engagement Plan,*To make training organizations for all employees regarding ESMP, to ensure their participation, to keep records of the conduct of training and awareness trainings for the personnel to ensure compliance with the environmental and safety commitments,* Establishing a grievance mechanism for all stakeholders,*Preparing environmental and social monitoring reports to be submitted to the organizations subject to the contract,*To carry out the monitoring process related to the implementation of the ESMP. <p>Human Sources Directorate: Sercenk ARSLAN sercenk.arslan@dalgakiran.com</p>

Table 9: Human Sources Duties and Responsibilities

Quality Assurance Directorate
<ul style="list-style-type: none">*Establishing an environmental management and OHS management system within the scope of the legal framework and ESMP,*Creating and updating the waste management plan and ensuring that the necessary measures are taken by analyzing the environmental dimensions,*To provide environmental awareness and waste management trainings to employees,*To provide OHS awareness trainings to employees,* Ensuring the delivery of wastes by licensed companies,* To ensure that the declarations to be made within the scope of the regulation are made,*Preparing and publishing field audit reports on environment and OHS within the scope of the legal framework and Company rules,* Evaluating risks and opportunities related to environment and OHS,* Carrying out studies to reduce waste,*Preparing the infrastructure of the facility in line with the ESMP recommendations,*Preparing environmental and social monitoring reports to be submitted to the organizations subject to the contract.
Quality Assurance Directorate: Sertan İlter ERTEKİN
sertan.ertekin@dalgakiran.com

Table 10: Quality Assurance Directorate Duties and Responsibilities

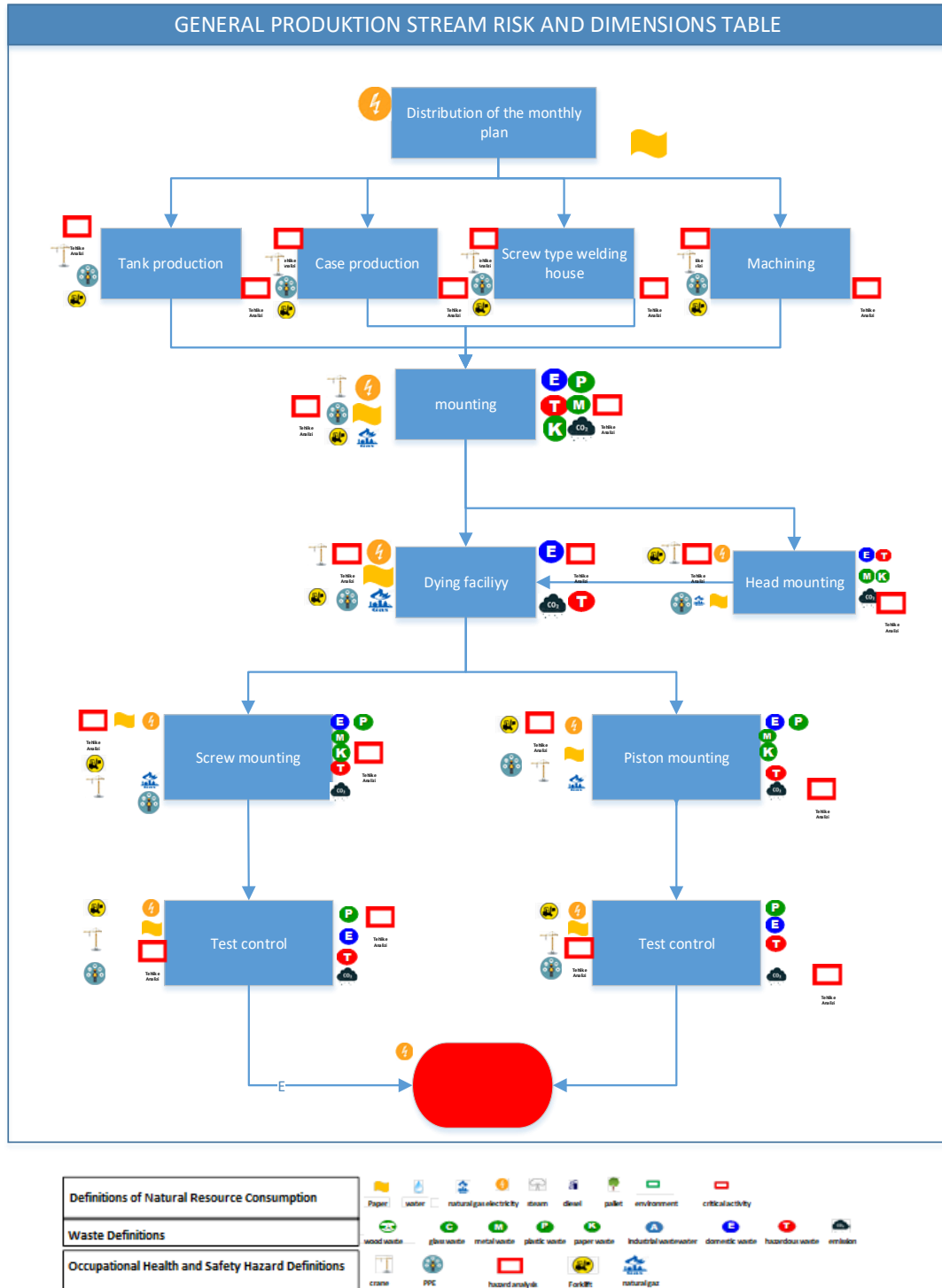
Facility Workers
<ul style="list-style-type: none">*Environment, OHS, grievance mechanism etc. within the scope of ESMP. Participating in the prescribed trainings and fulfilling individual responsibilities because of the trainings.
Environmental Specialist: Vildan BAYRAKTAR
kalite.direktorlugu@dalgakiran.com
OHS Specialist: Sinem KARAHAN
sinem.karahan@dalgakiran.com

Table 11: Facility Workers Duties and Responsibilities

2. COMPANY ACTIVITIES, FIELDS AND FEATURURES

2.1. General Production Stream

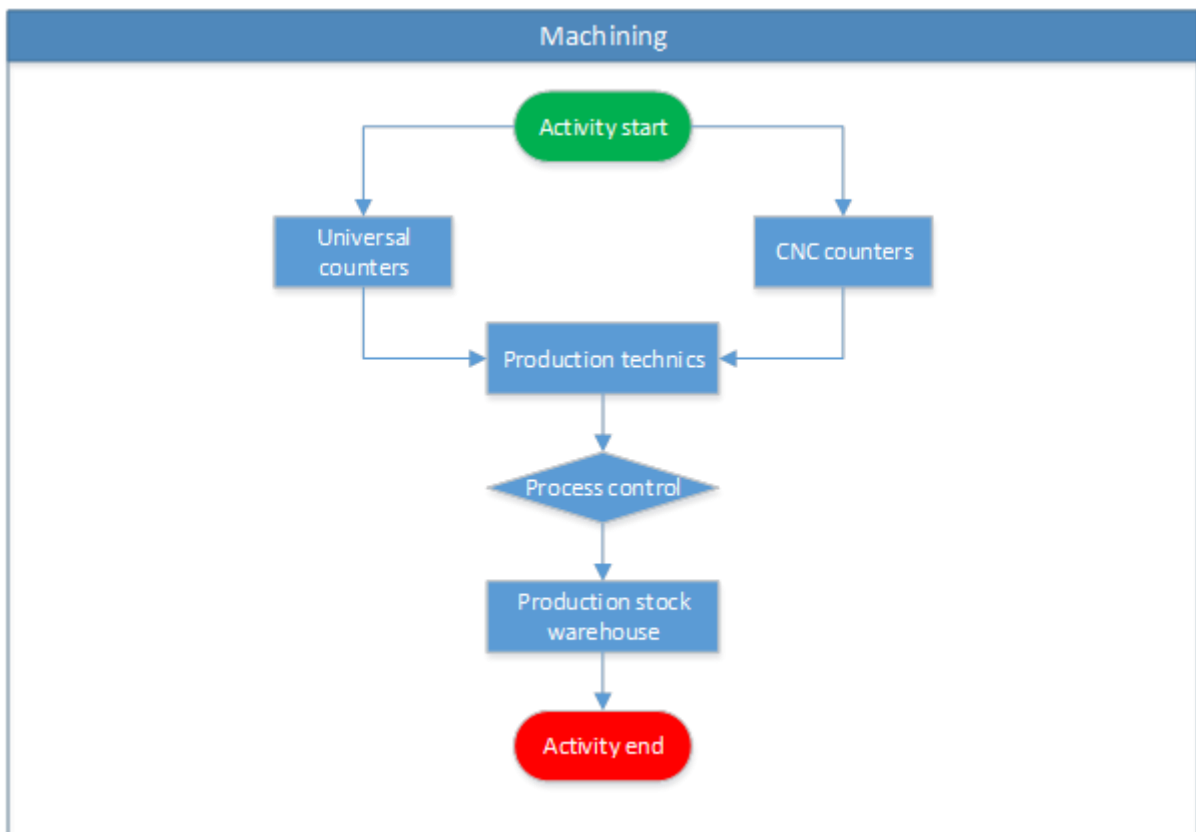
The general production flow and the environmental and OHS-oriented dimensions and hazards in the general flow are discussed with the table.



Shape 2: General Production Stream

2.1.1 Machining

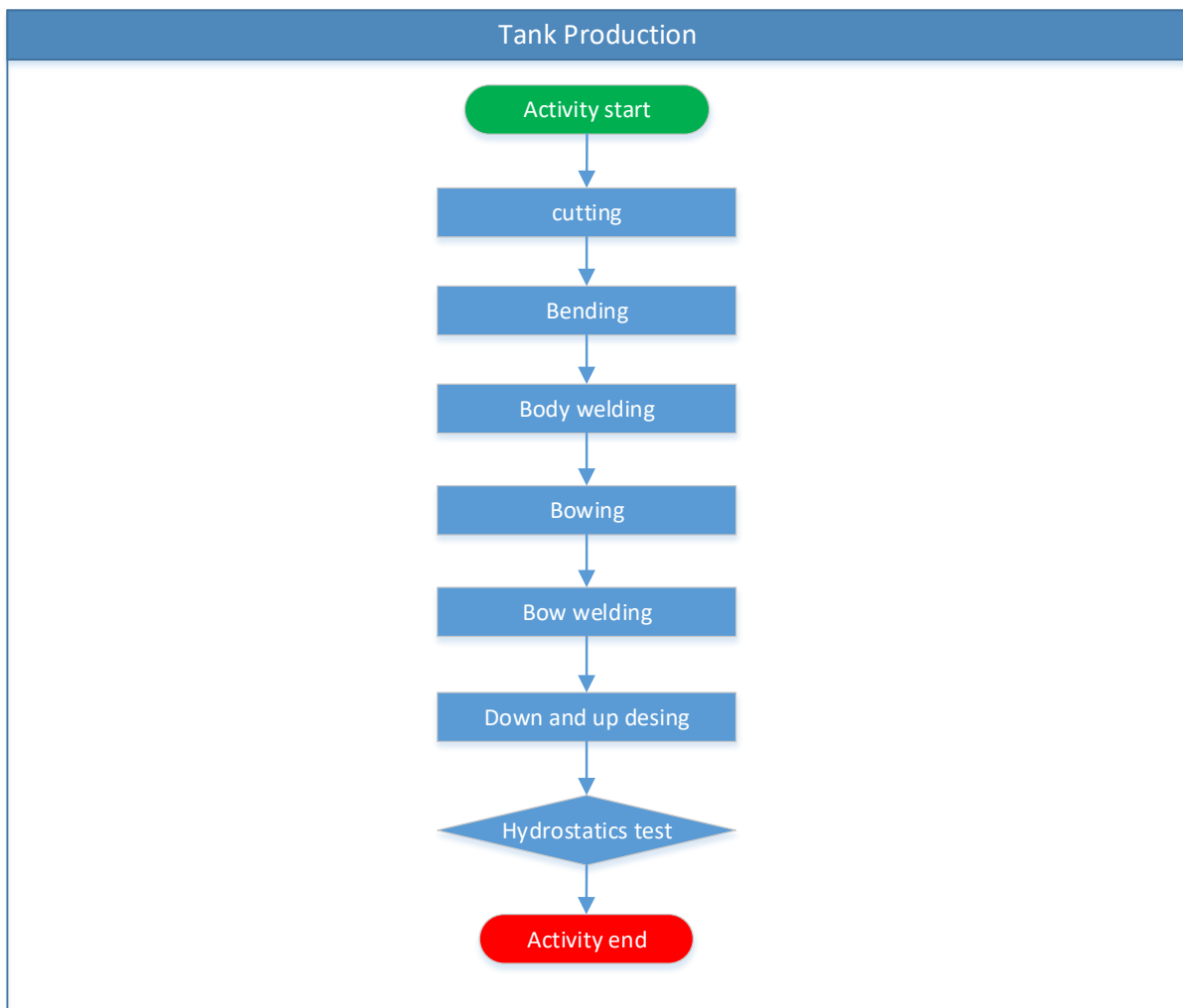
It is the production section where machining operations such as turning, milling, drilling, threading, grinding, honing, wedge opening are carried out to obtain the surface roughness of casting and sheet materials designed in accordance with the dimensions and tolerances specified in the technical drawings.



Shape 3: Machining Workflow Chart

2.1.2 Tank Production

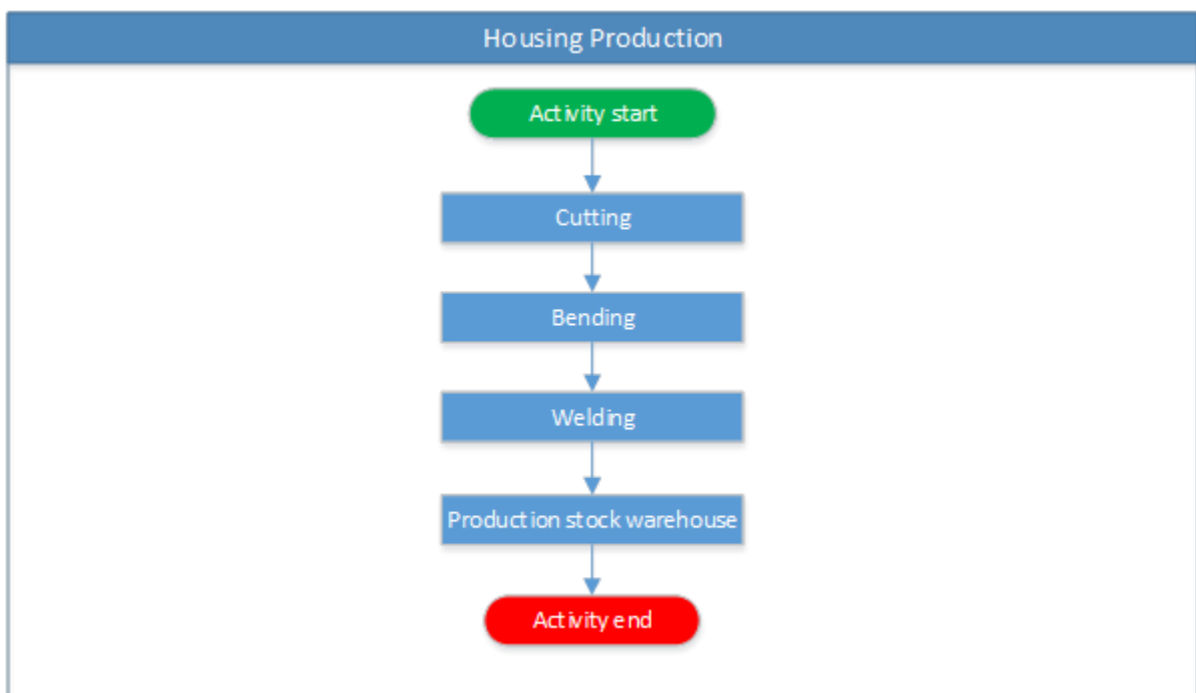
It is the production section where sheet metal materials are subjected to plasma cutting, cylindrical bending, body welding, camber fastening, camber welding, lower design, upper design processes and pressure vessel production is carried out. The general nature of the pressure vessels produced in this section; It is produced to accumulate compressed air in it, and therefore it has high volumes. All tanks produced are subjected to hydrostatic testing by 100% control and safety tests.



Shape 4: Tank Production Workflow Chart

2.1.3 Housing Production

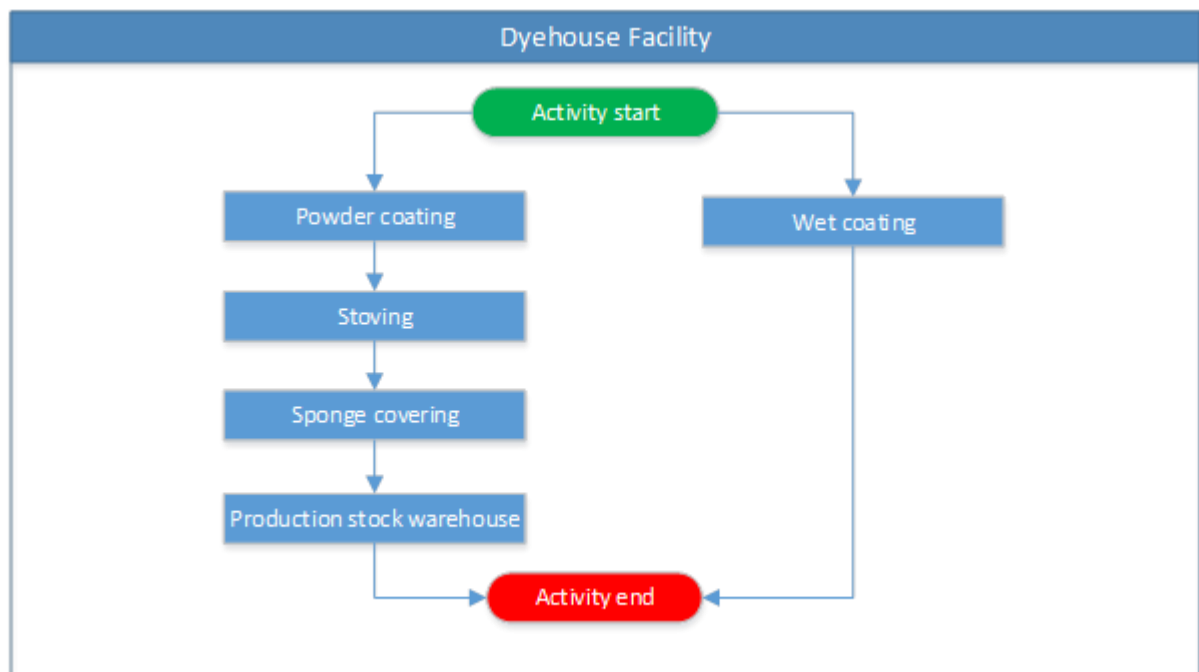
It is the production section where sheet metal materials are subjected to laser and punch cutting, bending, and welding operations in accordance with the dimensions and tolerances specified in the drawings and technical drawings, and forming the material is carried out.



Shape 5: Housing Production Flow Chart

2.1.4 Dyehouse Facility

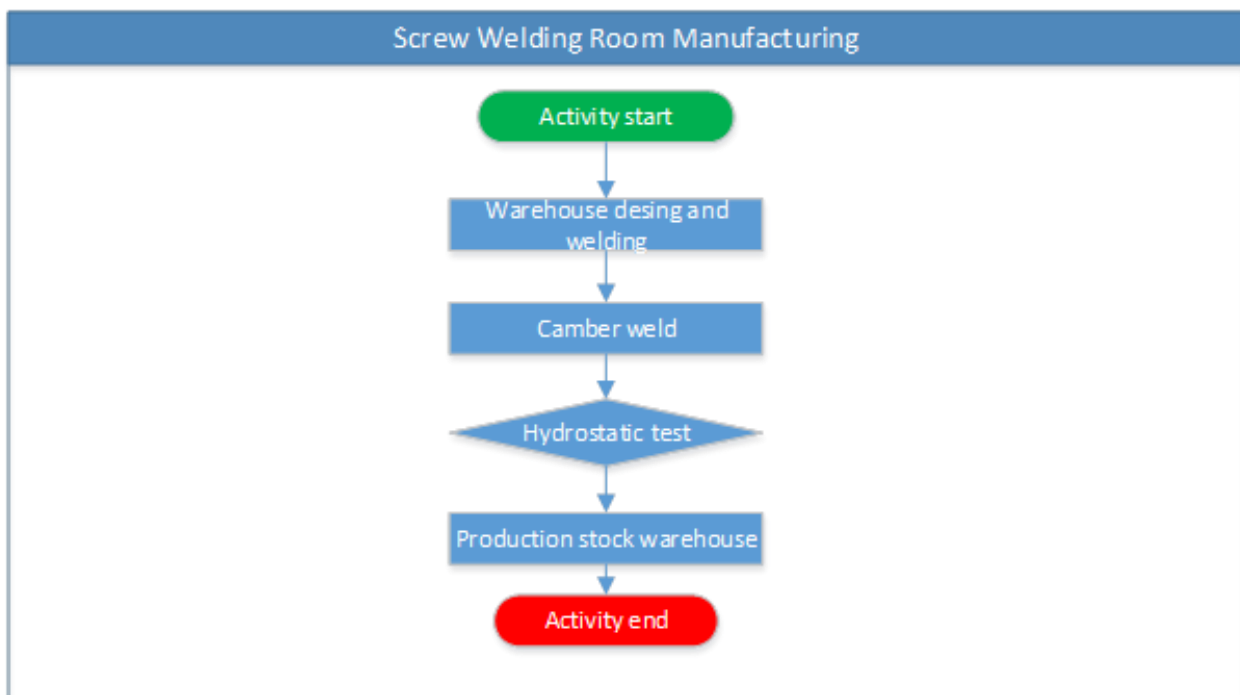
It is the production section where painting processes are carried out to ensure that the surface quality of the casting and sheet materials used in the assembly of the compressor is long-lasting (resistant to oxidation) and to have a cosmetically beautiful appearance, as well as the sponge coating operations on the covers and partially on the poles for insulation purposes.



Shape 6: Dyehouse Production Flow Chart

2.1.5 Screw Type Welding House

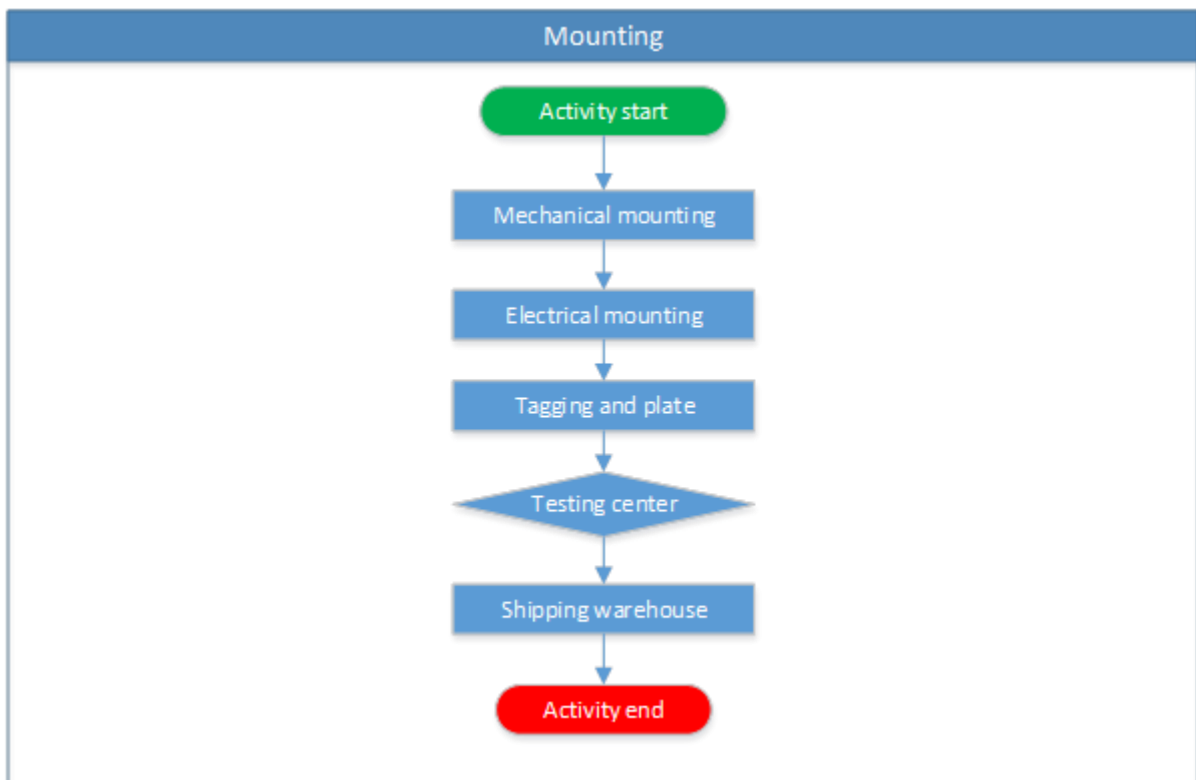
It is the production section where cylindrical pipes or cylindrically shaped tank bodies are subjected to camber driving, design and camber welding processes and pressure vessel production is carried out. The general nature of the pressure vessels produced in this section; It is a circuit element in the working line of the compressors produced. It is the first component in the compressor where the air and oil coming from the screw are separated by impact, which is located at the entrance of the tank. Their volume is lower than air tanks. In addition, chassis, radiator, and collector productions are carried out in the department.



Shape 7: Screw Type Welding House Production and Working Scheme

2.1.6 Mounting

Engine, screw, oil tank, radiator, electrical panel etc. on an air tank or base. It is the production section where compressor production is carried out because of assembling components such as auxiliary components with belt pulley or direct coupling.



Shape 8: Mounting Production and Working Scheme

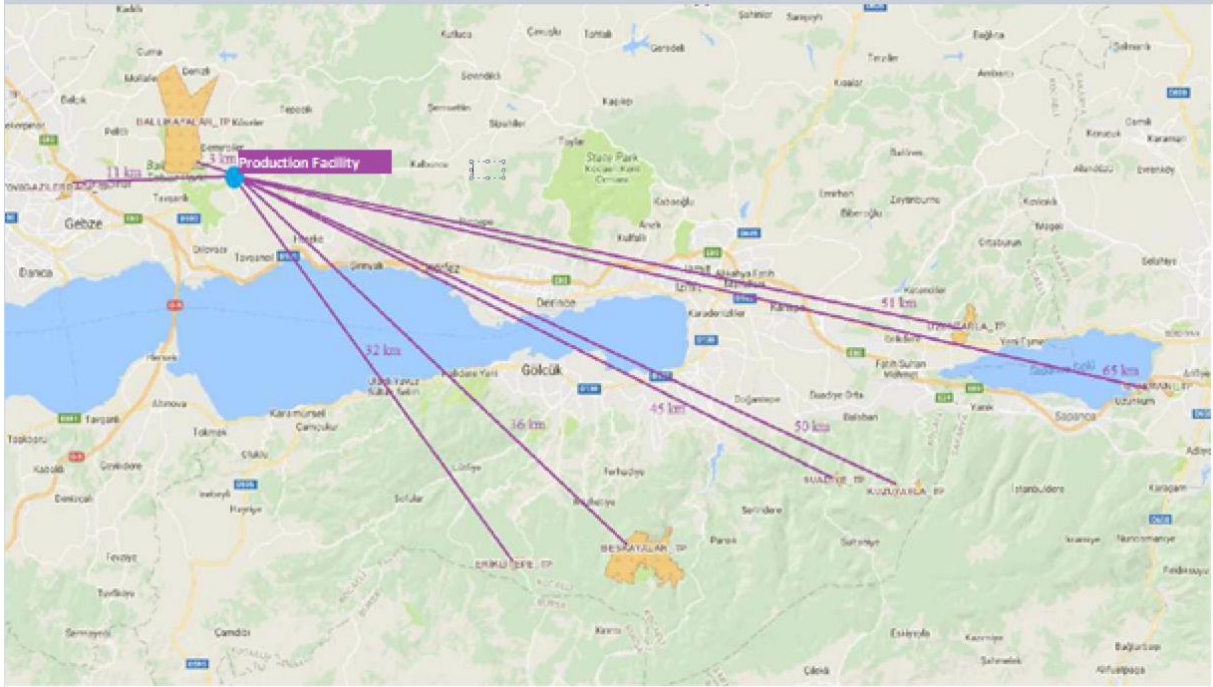
2.2 Protected Areas

2.2.1 Production Facility

According to clause 8 of the IFC Guidelines; *'The client is responsible for siting and designing a project to avoid significant adverse impacts to cultural heritage. The environmental and social risks and impacts identification process should determine whether the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations. The client will not disturb any chance find further until an assessment by competent professionals is made and actions consistent with the requirements of this Performance Standard are identified.'*

The Production Facility is located in the Makine İhtisas Organized Industrial Zone, and considering the list of sensitive areas in Annex-V in the production facility area and its immediate surroundings, *'Wetlands, National Parks, Special Protection Areas, Population Dense Areas, Historical, Cultural, Archaeological and Similar Importance There are no Erosion Areas, Landslide Areas, Afforestation Areas, Potential Erosion and Afforestation Areas, and Aquifers to be Protected in accordance with the Law No. 167 on Groundwaters dated 16/12/1960.'*

The total protected areas of Kocaeli province are 48,821.78 decares and constitutes 1.34% of the province's surface area. There are 8 nature parks, 1 wetland and 1 wildlife development area within the provincial borders. The distances to the Nature Parks and the production facility in Kocaeli are given in Map 1 and Table 12.



Map 1 : Nature Parks in Kocaeli Province

Distances to Nature Parks and Production Facility in Kocaeli Province	
Name Distance to Production Facility Site	Distance to the Production Facility
Beşkayalar Nature Park	36 km
Ballıkayalar Nature Park	3 km
Eriklitepe Nature Park	32 km
Suadiye Nature Park	45 km
Uzuntarla Nature Park	51 km
Kuzuyayla Nature Park	50 km
Veterans Mountain Nature Park	11 km
Uzunkum Nature Park	65 km

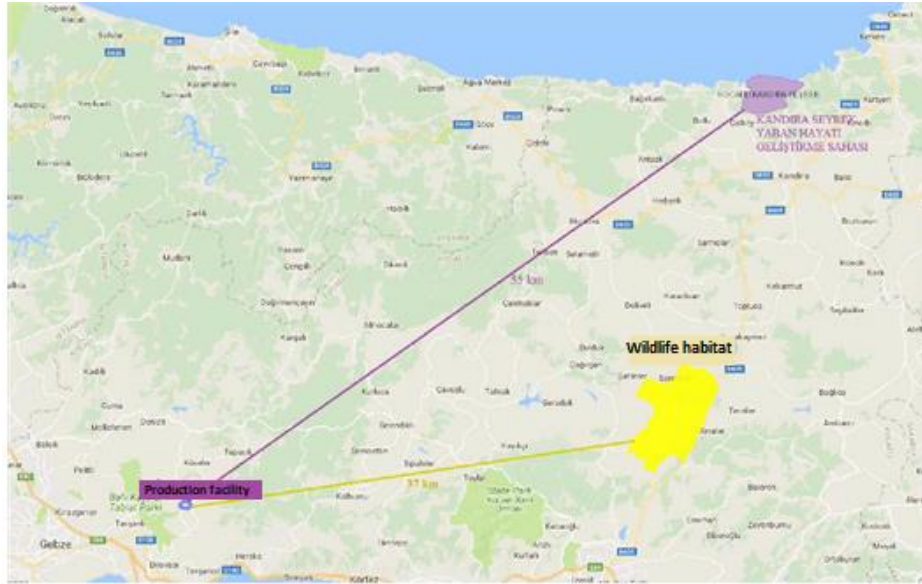
Table 12: Distances to Nature Parks and Production Facility in Kocaeli Province

Wildlife development area: It is the area where game and wild animals and wildlife are protected, developed, game animals are placed, measures to improve the living environment are taken and hunting can be done within the framework of a special hunting plan when necessary.

The Seyrek Wildlife Development Area, 50 km from the center of Kocaeli and 10 km from the center of Kandira, is a suitable and suitable habitat for wild animals with its flora and climate. Located within

the borders of Kandira district, the Black Sea is in the north, pine forests in the west and south, and Sarısu Stream in the east. Fishing with nets, chemicals or explosives is completely prohibited in Sarısu Creek, and only sport fishing is allowed. In the area where there are 63 ha of agricultural land and 1014 ha of forest, together with many ponds and streams; Roe deer (*Capreolus capreolus*) and red deer (*Cervus elaphus*) are the target protected species. (Source: Kocaeli Province 2016 Environmental Status Report, 2017)

In Kocaeli Province, there is Kandira Sparse Wildlife Development Area under the responsibility of the Ministry of Agriculture and Forestry, I. Regional Directorate Kocaeli Branch Office. The production facility area is approximately 55 km from the Seyrek Wildlife Development Area and approximately 37 km from the Wildlife Habitat (YHYS). The map showing the production facility area and the Sparse Wildlife Development and Living Areas is given in Map 2.



Map 2 : Wildlife Development and Habitats in Kocaeli Province

The Ava Forbidden Area is located 5.3 km east of the production site. The map showing the production site and hunting grounds is given in Map 3.



Map 3 :Hunting Area Map of Production Facility Site and Surroundings

The production facility is in the Organized Industrial Zone and does not have any cultural assets.

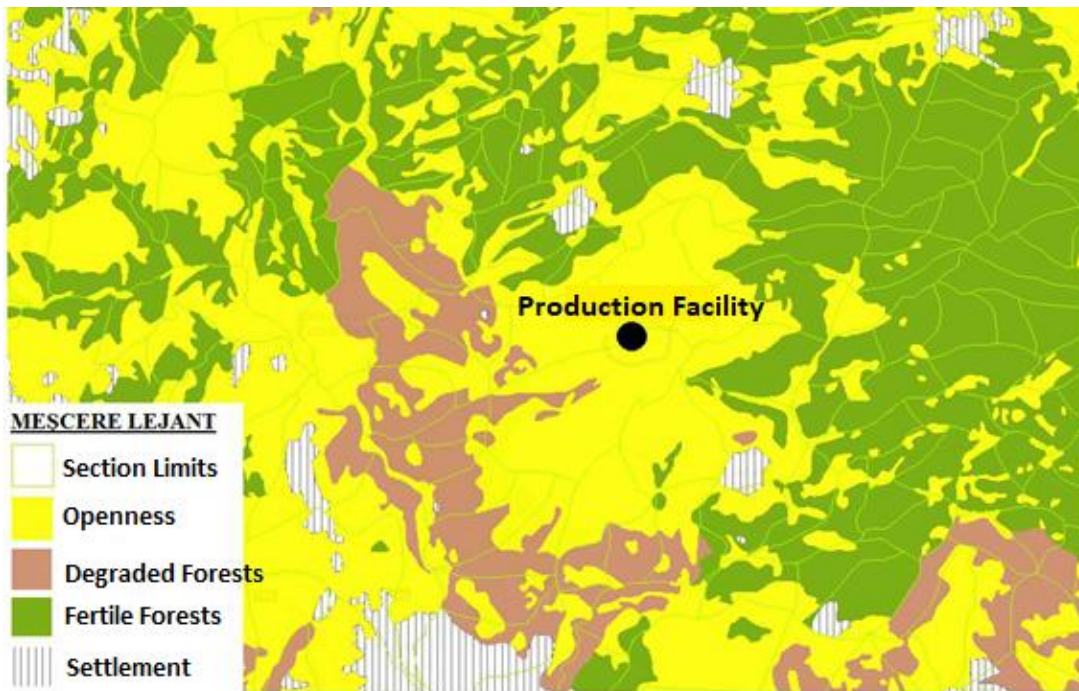
Cultural Heritage in Dilovası District	
Protected Area Name	
	Tavsancil Urban Protected Area
	Adatepe Necropolis Area III. Degree Archaeological Site
	Yılanca Tepe First Degree Archaeological Site
	Tavsancil First Degree Archaeological Site
	Köseler Village First Degree Archaeological Site
Monument Name	
	Mimar Sinan Bridge
	Tavsancil Station Building
	Tavsancil Station Building Outbuilding
	Blacksmiths Mansion
	Cemetery
	Friday Mosque
	Bath
	Dilovasi Conservation Society
	Bath Ruins
	Karaburnu Lighthouse
	Dilovasi Train Station

Table 13: Cultural Heritage in Dilovası District

Meadows and Pasture Areas in Kocaeli Province		
	Field (Hectare)	(%)
Total Agricultural Area	149.723,69	43,8
Cultivated Agricultural Area	92.038	-
Uncultivated Agricultural Land	57.684	-
Meadow and Pasture	1.474,31	0,43
Forest and Heather	147.110	43,03
Non-Farmland	43.539	12,74
Total	341.847	100

Table 14: Meadows and Pasture Areas in Kocaeli Province

Since the production facility is in the Makine İhtisas Organized Industrial Zone, there are various industrial establishments around it. The production facility area is in the open stand type. The distance to the nearest forest area in the southeast of the production facility site is 1500 m. “Stand Map of Production Facility Site and Its Environment” is as follows.



Map 4: Stand Map of Production Facility Site and Surroundings

2.2.2. Sancaktepe Administration Building

There are 23 nature parks throughout the province of Istanbul. These are; Polonezköy Nature Park, Türkmenbaşı Nature Park, Fatih Forest (Park Orman) Nature Park, Mehmet Akif Ersoy Nature Park, Kömürcübent Nature Park, Marmaracik Nature Park, Kirazlıbent Nature Park, Falih Rifki Atay Nature Park, Bentler Nature Park, Neşet Water Nature Park, Irmak Nature Park, Fatih Fountain Nature Park, Ayvat Bendi Nature Park, Göktürk Pond, Büyükada Nature Park, Değirmenburnu Nature Park, Dilburnu Nature Park, Mihrabat Nature Park, Elmasburnu Nature Park, Şamlar Nature Park, Avcıkoru Nature Park, Fatih Forest Nature Park is Locksmith Nature Park. The closest nature park to the General Directorate is Polonezköy Nature Park and is located approximately 30 km from the Administration Building on the map.

There is one registered Beykoz Gökarnalık Nature Reserve in Beykoz District within the borders of Istanbul Province. The said site is located at a distance approximately 33 km from the Administration Building on the map.

There are no national parks within the borders of Istanbul Province. There are no *Wildlife Development Areas, Wildlife Settlement Areas and Areas Prohibited by MAK Decision for Hunting Period* within the boundaries of the Administration Building. The administration building is located at a distance approximately 750 m from the State hunting area on the map.

There are no special areas defined as *Cultural Properties, Natural Properties, Site Sites and Conservation Areas* in the vicinity of the Administration Building.

2.2.3. İzmir Sales and Service Office

There are 5 conservation areas and nature parks in İzmir province. These; Tahtalı Dam Basin Boundary, Sipil Mountain National Park, Gediz Delta Ramsar Area, İzmir Bayındır Ovacık Wildlife Development Area, Cikrikci Dam Basin Boundary. The closest conservation area to the sales and service office is Tahtalı Dam Basin Border, 6.5 km away. The closest National Park is Sipil Mountain National Park, and the bird flight is 15 km from the Sales and Service Office.

It is in the distance. The closest Wildlife Development Area is İzmir Bayındır Ovacık Wildlife Development Area, which is 31 km from the Sales and Service Office by bird flight.

There are no special areas defined as *Cultural Properties, Natural Properties, Protection Areas and Conservation Areas* in the immediate vicinity of the Sales and Service Office.

2.2.4. Ankara Sales and Service Office

According to the Protected Areas Map in the area where the sales and service office is located, National Parks, Nature Parks, Wetlands, Natural Monuments, Nature Protection Areas, Wildlife Protection Areas, Wild Animal Breeding Areas, Cultural Heritage, Natural Assets, Protected and Protected Areas, there are no Biogenetic Reserve Areas, Biosphere Reserves, Special Environmental Protection Areas, Special Protection Areas.

The nearest III. Degree archaeological site is in Ankara Polatlı and is 74 km from the sales service office. The nearest urban forest is Kartaltepe, and it is 20 km from the sales service office. The promenade area in Yenimahalle is 8.3 km away.

2.3 Water Usage

Water consumed throughout the enterprise; It is provided as the daily use of the employee and the process water in the manufacturing processes. The production facility, Ankara sales and service office supplies the mains water from the OIZ, to which it is connected, the Administration Building and Izmir sales and service office are provided by the municipalities to which it is affiliated.

The daily drinking water needs of the employees are provided from pet bottles provided by licensed companies.

765 people work across the enterprise. According to TUIK 2020 data, the average daily water consumption per capita has been accepted as 2,28 lt/day. The amount of water required throughout the enterprise was calculated as follows.

Daily water requirement = number of people x average. water consumption = 765 x 228 = 174.420 lt/day

2.4 Flora and Fauna Species

According to clause 6 of the IFC Guidelines; *'The risks and impacts identification process as set out in Performance Standard 1 should consider direct and indirect project-related impacts on biodiversity and ecosystem services and identify any significant residual impacts. This process will consider relevant threats to biodiversity and ecosystem services, especially focusing on habitat loss, degradation and*

fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, and pollution.'

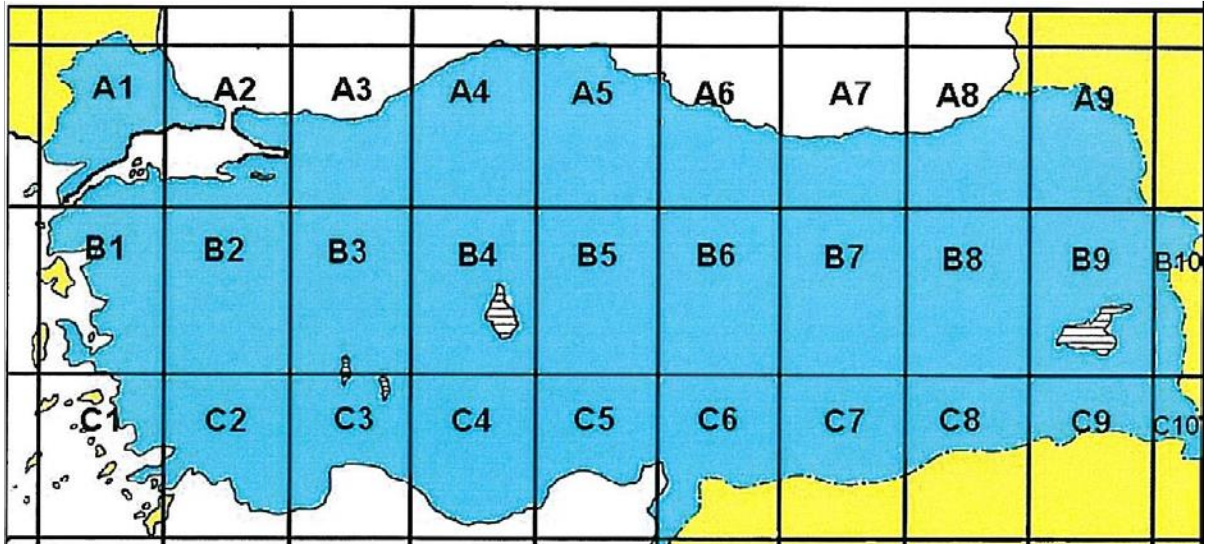
A site inspection was carried out on 12 December 2022 with the aim of completing the flora and fauna studies in the areas where the production facility and the Administration Building operate. This study, which was carried out to determine the reference conditions, was supported by literature reviews and desk studies. The data obtained because of the studies provided an overall picture of the conditions and vulnerabilities in the region that should be considered in the assessment of potential impacts and the development of mitigation measures.

Since the Company uses operating credit, no negative impact from the project area will be observed.

2.4.1 Flora Species

2.4.1.1 Production Facility

Production facility: It is in the southeast of the Marmara Region due to its geographical location and is in the A2 square according to the Grid System proposed by Davis (1965) to monitor the distribution of the species in our country more easily (Davis et al. 1965-1985).

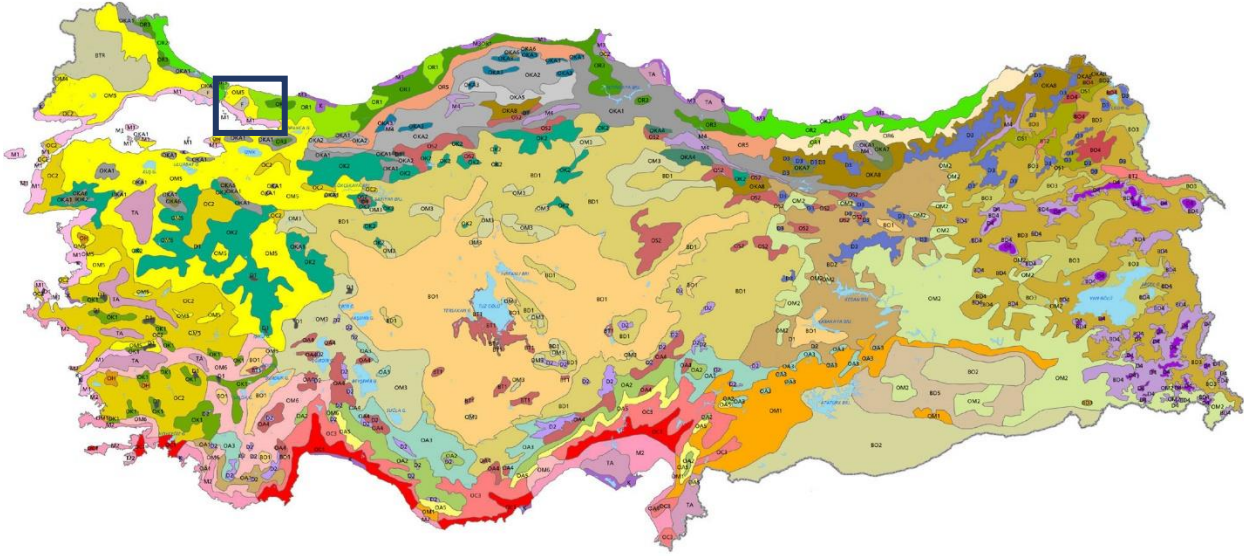


Map 5: P. H Davis Grid Squaring System (Source: Davis P. H. Flora of Turkey and East Aegean Islands)

Since the production facility is in the organized industrial zone, the presence of natural flora and fauna is out of question. The entire area where the facility is located is under anthropogenic influence.

It can be said that the climate of Kocaeli Province constitutes a transition between the Mediterranean climate and the Black Sea climate. In Kocaeli, summers are hot and less rainy, winters are rainy, snowy, and cold from time to time.

The production facility is shown on the Turkey Vegetation Map below. Although the production facility area is seen as *Pirnal Meşasi Maki Community* according to the vegetation map, the activity area and its surroundings are located within the industrial zone and consist of an area that has lost its natural vegetation structure.



Map 6: Vegetation Map of Production Plant Area and Surroundings

The characteristic climate of the areas entering the Euro-Siberian Phytogeographic Region; Except for the Black Sea Region (except for the Black Sea back depressions) and the Gallipoli and Biga peninsulas, where the summers are relatively hot, the winters are not very cold and all seasons are rainy, that is, the humid - temperate and humid - cold climate is effective, the Marmara Region (in Thrace) Except for the Ergene Basin). Due to the favorable climatic conditions on plant life, this region is the richest region of our country in terms of plant communities.

Here, more than half of its properties are located, with tree assemblages and/or forests of different physiognomy.

FAMİLYA	TYPE	TURKISH NAME	PHOTOGEOGRAPHIC REGION	HABITAT								RELATIVE ABUNDANCE					END.			HAZARDOUS CLASS
				1	2	3	4	5	6	7	8	1	2	3	4	5	L	B	Y	
ACERACEAE	Acer Campestre	-	Europe-Siberia	x				x							x					
ANACARDIACEAE	Pistacia Terebinthus	Sakiz	Mediterranean											x	x					
BORAGİNACEAE	Echium italicum	Engerek	Mediterranean					x							x					
		OTU																		
CİSTACEAE	Cistus Creticus	Karaği	Mediterranean					x	x						x					
	Anthemis Arvensis	-	Iran-Turan					x							x					
	Carlina Lanata	-	Mediterranean										x	x						
COMPOSITAE	Carthamus Lanatus	-	Mediterranean												x					
	Xanthium Spinosum		Mediterranean	x				x							x					
	Bellis Prennis	Koyunözü	Europe-Siberia	x					x						x					
CRUCİFEARE	Raphanus Raphanistrum	Turp Otu	Europe-Siberia					x	x						x					
CORYLACEAE	Carpinus Orientalis Ssp.	Ak Gürgen	Europe-Siberia	x															x	
	Orientalis																			
CONVOLVULACEAE	Convolvulus Arvensis	Tarla SARMAŞIĞI	Iran-Turan					x	x						x					
MALVACEAE	Malva Sylvestris	Ebegümeçi	Europe-Siberia	x					x						x					
PAPAVERACEAE	Papaver Rhoeas	Gelincik	Europe-Siberia					x	x						x					
DİPSACACEAE	Scabiosa Argentea	Uyuz Otu	Iran-Turan						x					x						
LAURACEAE	Larus Nobilis	Defne	Mediterranean		x										x					
	Trifolium Arvense Var.	-	Mediterranean	x										x	x					
	Arvense																			
LEGÜMİNOSAE	Astragalus Glycyphyllos Ssp.	-	Europe-Siberia	x																x
	Glycyphyllos																			
	Cercis Siliguastrum	Erguvan	Uran-Turan	x																x
	Spartium Junceum	-	Mediterranean		x										x	x				
PRİMULACEAE	Anagillis Arvensis	Fare Kulaği	Europe Siberia	x											x					
OLEACEAE	Phillyrea Latifolia	Kesme	Mediterranean		x										x					
	Crataegus Monogyna Ssp.	Geyik Dikeni	Europe-Siberia		x															x

FAMİLYA	TYPE	TURKISH NAME	PHOTOGEOGRAPHIC REGION	HABITAT								RELATIVE ABUNDANCE					END.			HAZARDOUS CLASS
				1	2	3	4	5	6	7	8	1	2	3	4	5	L	B	Y	
	Monogyna																			
ROSACEAE	Rubus Canescens	Kapina	Europe-Siberia	x								x								
	Fragaria Vesca	Dağ Çileği	Europe-Siberia	x					x			x								
	Sorbus Tormialis Var. Tormialis	-	Europe-Siberia	x									x							
VITACEAE	Vitis Vinifera	-	Europe-Siberia				x					x								
RANUNCULACEAE	Ranunculus Repens	-	Mediterranean	x				x				x								
	Delphinium Peregrinum	-	Iran-Turan	x						x		x								
THYMELAEACEAE	Dalphe Pontica	Kurt Bağı	Europe-Siberia	x									x							
	Plantago Lanceolata	Yılan Otu	Europe-Siberia	x					x				x							
PLANTAGINACEAE	Plantago Lagopus		Mediterranean	x									x							
	Plantago Lanceolata	Yılan Otu	Europe-Siberia	x						x			x							
	Salvia Virgata	Yılanlık	Europe-Siberia																	
LABIATAE	Lamium Amplexicaule		Europe-Siberia	x										x						
	Prunella Vulgaris		Europe-Siberia	x											x					
	Mentha Pulegium	Yarpuz	Europe-Siberia	x										x						
	Stachys Sylvatica	-	Europe-Siberia	x										x						
HYPERICACEAE	Hypericum Perforatum	Binbir Delik	Europe-Siberia	x										x						
FAGACEAE	Fagus Orientalis	Doğu Kayını	Europe-Siberia	x									x							
	Quercus Coccifera	Kermes Meşesi	Mediterranean		x								x	x						
	Quercus Infectoria Ssp. Boissieri	Mazi Meşesi	Mediterranean	x											x					
PINACEAE	Pinus Nigra Ssp. Pallasina	Karaçam	Europe-Siberia	x					x						x					

Table 15: Flora Species likely to be found in and around the Production Facility Area

To determine the endemic and endangered plant species from the above-mentioned species, the Turkish Plants Data Service is based on the web address <http://turkherb.ibu.edu.tr> and the Turkish

Nature Conservation Society has published the *Red Data Book of Turkish Plants*. Investigated and no endangered plant species were found.

Necessary measures will be taken for plant species likely to be found in the region within the scope of the activities of the Production Facility, and there will be no negative impact on the generations of plant species originating from the said activity.

44% of Kocaeli province has forest areas. The region where the facility is located is excluded from the areas considered as forest areas in accordance with the *Forest Law* published in the Official Gazette dated 31.08.1956 and numbered 6831.

According to Dilovası Operations Chief's data, there is a total forest area of 10,148.50 ha, of which 4.177.50 ha of Normal Forest, 5.971 ha of Degraded Forest, and 5.561ha of Deforested Area in the general area of 15,709.50 ha.

The main tree species in the high forests of the Izmit Forestry Directorate are Beech, Oak Black Pine, Beach Pine and Radiata Pine. Alder, Ash Tree, Hornbeam, Aspen, Aspen etc. as secondary tree species. are mixed. Oak, Chestnut, Beech, and Hornbeam species form pure stands in the forests in the forest bond COMPANY class.

FOREST			COPPICE FOREST			TOTAL FOREST			GRASS HECTARE	FOREST FREE (INCLUDES GRASS) HECTARE	GENERAL TOTAL HECTARE	FOREST AREA PERCENT
NORMAL HECTARE	BORROWED HECTARE	TOTAL HECTARE	NORMAL HECTARE	BORROWED HECTARE	TOTAL HECTARE	NORMAL HECTARE	BORROWED HECTARE	TOTAL HECTARE				
70.321,50	12.603,60	82.925,10	47.107,10	16.534,20	63.641,30	117.428,60	29.137,80	146.566,40	8.666,90	188.689,80	335.256,20	44

Table 16: Kocaeli Province Forest Area Distribution

2.4.1.2 Sancaktepe Administration Building

Administration Building: It is in the southeast of the Marmara Region in terms of its geographical location, and it is in the A2 square according to the Grid System proposed by Davis (1965), shown in Map-5 for easier monitoring of the distribution of the species in our country (Davis et al. 1965-1985).

The characteristic climate of the areas entering the Euro-Siberian Phytogeographic Region; Except for the Black Sea Region (except for the Black Sea back depressions) and the Gallipoli and Biga peninsulas, where the summers are relatively hot, the winters are not very cold and all seasons are rainy, that is, the humid - temperate and humid - cold climate is effective, the Marmara Region (in Thrace) Except for the Ergene Basin). Due to the favorable climatic conditions on plant life, this region is the richest region of our country in terms of plant communities.

Here, more than half of the plants in our country are found, there are tree communities and/or forests with different physiognomy characteristics.

FAMILY	TURKISH NAME	HABITAT	END	R.D	BERN	IUCN	FTC	N.B.	DETECTI ON
PAPAVERACEAE									
Hypocoum procumbens L.	Hidrellez Otu	Empty Space, Sea Side	-	-	-	-	Mediterranean	2	L
CARYOPHYLLACEAE									
Silene gallica L.	Nakil	Open Space	-	-	-	-	Cosmopolite	2	L
CHENOPODIACEAE									
Chenopodium glaucum L.	Sirken	Empty Land, Moist Salty Areas, Roadsides, Beaches	-	-	-	-	Europe-Siberia	3	G
MYRTACEAE									
Eucalyptus sp.	Ökalyptus	People Planted	-	-	-	-	?	1	G
LINECEAE									
Linum austriacum L. ssp. austriacum	Keten	Roadsides	-	-	-	-	?	2	G
APOCYNACEAE									
Nerium oleander L.	Zakkum	People Planted	-	-	-	-	Mediterranean	1	G
ASTERACEAE									
Anthemis tomentosa L. ssp. tomentosa	Papatya	Near Beaches, Free Spaces	-	-	-	-	Eastern Mediterranean	2	G
POACEAE									
Puccinellia intermedia (Schur) Janchen	Sağır Tuzçimi	Roadsides	-	-	-	-	?	1	L
Dactylis glomerata L. ssp. hispanica (Roth) Nyman	Domuz Ayriği	Roadsides	-	-	-	-	?	2	L
Setaria viridis (L.) P. Beauv.	Siçansaçi	Borrowed Fields, Roadsides	-	-	-	-	?	2	L
Bothriochloa ischaemum (L.) Keng	Sakalotu	Roadsides	-	-	-	-	?	2	L

Table 17: Flora Species likely to be found in and around the Administration Building Area

2.4.1.3 Izmir Sales and Service Office

The Sales and Service Office is under the influence of the Western Mediterranean Section of the Mediterranean Flora Region. The region where the office is located is in the B2 square according to the Grid System proposed by Davis (1965), shown in Map 5, to monitor the distribution of the species in our country more easily (Davis et al. 1965-1985).

In the area where the sales office is located, the Mediterranean climate prevails, with hot and dry summers and warm and rainy winters. With the effect of the Mediterranean climate, the vegetation in the district is formed by maquis.

The main flora species that can be found in and around the sales office area are as follows:

FAMILY	SPECIES	TURKISH NAME	PHOTOGEOGRAPHIC REGION	HABİTAT	RELATIVE ABUNDANCE	END.	BERN	IUCN	SOURCES
SELAGINELLACEAE	Selaginella Denticulata (L.) LINK	Selagingiller Dişli Selagin	Mediterranean, West and South Anatolia	Shady Rocky Maquis Elevation: - 350	2	-	-	-	L
ASPLENIACEAE	Asplenium Trichomanes L. Asplenium Adiantum-Nigrum L.	Saçakotugiller Saçakotu Baldirkara	-/ D1 Anatolia	Between Rocks, Calcareous and Non-Calcareous Wall Height: 20-2000 Shaded Rock, Wall, Edge Height: 10-1700	2	-	-	-	L
CUPRESSACEAE	Juniperus Oxycedrus L. Subsp. Oxycedrus L.	Servigiller Katran Ardırcı	-/ Turkey	Pine Forest1, Oak Bush1, Maquis Height:0-1800	2	-	-	-	L
RANUNCULACEAE	Delphinium Staphisagria L. Clematis Cirrhosa L.	Düğünçeğigiller Kokar Ot Bahar Sarmaşığı	Mediterranean, West and South Anatolia	Woodland, Empty Space, Limestone Rock Height: 0-250	2	-	-	-	L
PAPAVERACEAE	Papaver Gracile BOISS.	Haşhaşgiller Zemperlik	Mediterranean, West and South Anatolia	Rocky, Maquis Height: 0-1300	2	-	-	-	L
CISTACEAE	Cistus Creticus L. Cistus Laurifolius L.	Ladengiller Karağan Yapışkan Pamuklu	Mediterranean, West and South Anatolia	Maki, Garik Height:0-1000 Maquis, Pinus Nigra Forest1 Height:50-1200	3	-	-	-	L
GUTTIFERAE	Hypericum Atomarium BOISS.	Kantarongiller Serkil	Mediterranean, West and South Anatolia	Calcareous And Volcanic Rocks, Mak, Height: 60-1000	2	-	-	-	L
ACERACEAE	Acer Sempervirens L.	Akçaağaçgiller Doğu Akçaağacı	Mediterranean, West and South Anatolia	Rocky Limestone Slopes, Gorges Height:100-1100	2	-	-	-	L
ANACARDIACEAE	Pistacia Leutiscus L.	Menengiçgiller Sakız Ağacı	Mediterranean, West and South Anatolia	Maki Height:0-200	2 - 3	-	-	-	L

FAMILY	SPECIES	TURKISH NAME	PHOTOGEOGRAPHIC REGION	HABİTAT	RELATIVE ABUNDANCE	END.	BERN	IUCN	SOURCES
FABACEAE	Teline Monspessulana (L.) C. KOCH Genista Acanthoclada DC. Spartium Junceum L.	Baklagiller Üçtelli Çalı Kertikefen Katırtırnağı	Mediterranean, West and South Anatolia		2	-	-	-	L
MYRTACEAE	Myrtus Communis L. Subsp. Communis L.	Mersingiller Mersin	External Anatolia	Rocky Slopes, Pinus Brutia Forests, Scrub, Dunes Height:0-550	2	-	-	-	L
VALERIANACEAE	Valerianella Hirsutissima LINK	Kediotugiller Yünlü Kuzugevreği	Norther Mediterranean, Wester Turkey	Scrub, Hills Height:0-1500	2	-	-	-	L

Table 18: Flora Species likely to be found in and around the Sales Office Area

2.4.1.4 Ankara Sales and Service Office

The region where the Sales and Service Office is located is in A3, A4 and B4 squares according to the Grid System proposed by Davis (1965), shown in Map 5, to monitor the distribution of the species in our country more easily (Davis et al. 1965-1985).

Surrounded by high mountains, the province has a climate with cold winters and dry summers. It receives the most precipitation in spring. These climatic conditions and geographical structure have led to the development of two separate plant communities in Ankara and its environs, such as steppe and forest.

In the preparation of the flora list of the region, it was prepared by making use of the literature studies conducted in the region in previous years and the Ankara Provincial Environmental Status Report.

FAMILY	SPECIES	TURKISH NAME	HABİTAT	PHOTOGEOGRAPHIC REGION	END	IUCN RED DATA BOOK	BERN	CİTES
RANUNCULACEAE	Adonis Flammea Jacq.	Çin Lalesi	Field, Steppe, Rocky	-	-	-	-	-
	Consolidated Regalis	-	Broken Steppe, Fallow Field	-	-	-	-	-
	Ranunculus Repens	-	Damp Place	-	-	-	-	-
PAPAVERACEAE	Glaucium Corniculatum Subsp. Refractum	Boynuzlu Gelincik	Steppe Field	Iran-Turan	-	-	-	-
	Papaver Dubium	-	Rocky Places	-	-	-	-	-
BRASSICACEAE	Alyssum Desertorum	-	Cultivated Field, Open Ground	-	-	-	-	-

FAMILY	SPECIES	TURKISH NAME	HABITAT	PHOTOGEOGRAPHIC REGION	END	IUCN RED DATA BOOK	BERN	CİTES
	Sinapis Arvensis	Yabani Hardal	Roadside, Empty Space	-	-	-	-	-
POLYGALACEAE	Polygala Anatolica	Yılan Yoncası	Slope	-	-	-	-	-
CARYOPHYLLACEAE	Minuartia Hirsuta	-	Stony Places	-	-	-	-	-
	Silene Chlorifolia	-	Slopes, Hillsides, Roughness	Iran-Turan	-	-	-	-
ILLECEBRACEAE	Herniaria Glabra		Dry And Stony Places	-	-	-	-	-
POLYGONACEAE	Rumex Acetocella	Kuzu Kulağı	Fields, Shores, Barren Places	Cosmopolite	-	-	-	-
HYPERICACEAE	Hypericum Perforatum	Binbirdelik Otu	Dry Habitats in Mesophytic Regions	-	-	-	-	-
MALVACEAE	Malva Sylvestris	Büyük Ebegümeçi	Bushes, Fields, Open Places	-	-	-	-	-
LINACEAE	Linum Nodiflorum		Fallow Fields and Barren Places	Mediterranean	-	-	-	-
GERANIACEAE	Erodium Ciconium		Fields, Meadows, Steppe	-	-	-	-	-
ZYGOPHYLLACEAE	Tribulus Terrestris	Demir Bitrağı	Open and Sandy Places, Fallow Fields	-	-	-	-	-
RHAMNACEAE	Paliurus Spina-Christi	Karaçalı	Straits, River Valleys, Barren Places	-	-	-	-	-
FABACEAE	Astragalus Hamosus		Prairies, Roadsides	-	-	-	-	-
	Trifolium Patens	Yonca	Meadows	-	-	-	-	-
ROSACEAE	Armeniaca Vulgaris	Zerdali	Culture	-	-	-	-	-
	Crategus Curvisepala	Alıç	Clear Slopes, Riverbanks	-	-	-	-	-
	Patentilla Recta	Beşparmakotu	Meadows, Pastures, Wet and Shady Places	-	-	-	-	-
APIACEAE	Eryngium Campestre	Tokuz Otu	Degraded Steppe, Fallow Fields, Dunes	-	-	-	-	-
DIPSACACEAE	Scabiosa Argentina	Uyuz Otu	Barren Places, Fields, Steppe, Stony Slopes	-	-	-	-	-
ASTERACEAE	Achillea Biebersteinii	Sarı Civanperçemi	Steppe, Arid Meadow, Rocky Slope, Fallow Field	Iran-Turan	-	-	-	-
	Anthemis Tinctoria	Papatya	Steppe, Field, Limestone Edges, Bushes	-	-	-	-	-
CONVOLVULACEAE	Convolvulus Arvensis	Kuzu Sarmaşığı	Sandy Steppe, Rivers, and Lakes	-	-	-	-	-
LAMIACEAE	Ajuga Chamaepitys	Mayasıl Otu	Fallow Fields Are Barren and Gravelly Places	-	-	-	-	-
	Salvia Viridis	Ada Çayı	Fields And Wastelands	Mediterranean	-	-	-	-
PLANTAGINACEAE	Plantago Lanceolata	Yılan Otu	Meadows, Swampy Places, Scrub, Stream Banks	-	-	-	-	-
SALICACEAE	Populus Alba	Akkavak	Deciduous Grove, Riverbank	-	-	-	-	-

FAMILY	SPECIES	TURKISH NAME	HABITAT	PHOTOGEOGRAPHIC REGION	END	IUCN RED DATA BOOK	BERN	CİTES
	Salix Alba	Aksögüt	Lake Edges, Streams, and Streams	-	-	-	-	-
POACEAE	Secale Anatolicum		Dry Hills, Cliffs, Slopes, Ravine	-	-	-	-	-
	Hordeum Bulbosum		Volcanic Slopes, Steppe, Irrigated Grasslands	-	-	-	-	-
	Poa Pratensis		Wet Pastures, Stream Banks	-	-	-	-	-

Table 19: Flora Species likely to be found in and around the Sales Office Area

Since Ankara Sales and Service Office is in the organized industrial zone, the presence of natural flora and fauna is out of question. The entire area where the facility is located is under anthropogenic influence.

To determine the endemic and endangered plant species from the above-mentioned species, the *Turkish Plants Data Service* is based on the web address <http://turkherb.ibu.edu.tr> and the Turkish Nature Conservation Society has published the *Red Data Book of Turkish Plants*. Investigated and no endangered plant species were found.

Necessary measures will be taken for the plant species likely to be found in the region within the scope of the OPERATION activities, and there will be no negative impact on the generations of plant species originating from the said activity.

2.4.2 Fauna Species

2.4.2.1. Production Facility

In the Fauna tables given below, it is stated that the animal species are in the Family, the danger categories according to IUCN, their endemism status, which list they are in according to the BERN Convention and in which list they are included in the list according to the Central Hunting Commission Decisions within the scope of international trade rules.

FAMILY	TURKISH NAME	RDB	IUCN	END	BERN CONVENTION	MAK (2018-2019)
AVES	KUŞLAR					
CLASS: FALCONIFORMES	Doğanlar					
FAM: FALCONIDAE	Doğangiller					
SP : FALCO TINNUNCULUS	Kerkenez	A-4	V	-	ANNEX II	ANNEX II
CLASS: GALLIFORMES	Tavuklar					
FAM: PHASIANIDAE	Tavuksular					
SP: COTURNIX	Bildircin	A-4	V	-	-	ANNEX I
CLASS COLUMBIFORMES	Güvercinler					
FAM: COLUMBIDAE	Güvercingiller					
SP: COLUMBA LIVIA	Kaya Güvercini	A-4	-	-	-	ANNEX I
SP: STREPTOPELIA DECAOCTO	Kumru	A-4	-	-	-	ANNEX I
TAKIM: PASSERIFORMES	Ötücü Kuşlar					
FAM: ALAUDIDAE	Tarlakuşugiller					
SP: GALERIDA CRISTATA	Tepelitoygur	-	O	-	-	ANNEX II
SP: EREMOPHILA ALPESTRIS	Kulaklı Tarla Kuşu	-	O	-	EK-II	ANNEX II
FAM: TURDIDAE	Ardıç Kuşugiller					
SP: SAXICOLA TORGUATA	Taşkuşu	-	O	-	-	ANNEX II
TAKIM: PASSERIFORMES	Ötücü Kuşlar					
FAM: CORVIDAE	Kargagiller					
SP: PICA PICA	Saksağan	-	O			ANNEX III
SP: CORVUS MONEDULA	Leş Kargasi	-	O	-	-	ANNEX III
SP: CORVUS CORONE CORNIX	Cüce Karga	-	O	-	-	ANNEX III
SP: CORVUS CORAX	Karakarga	-	O	-	-	ANNEX III
FAM: STURNIDAE	Doğanlar					
SP: STURNUS VULGARIS	Doğangiller	-	O	-	-	ANNEX II
FAM: PASSERIDAE	Kerkenez					
SP: PASSER DOMESTICUS	Tavuklar	-	O	-	-	ANNEX II
FAM: EMBERIZIDAE	Tavuksular					
SP: EMBERIZA CALANDRA	Bildircin	-	O	-	-	-

Table 20: Fauna Species (birds) likely to be found in and around the Production Facility Area

Turkish Environmental Legislation *Convention on Conservation of European Wildlife and Habitats* and its annexes were also examined.

LATIN NAME	TURKISH NAME	RDB	IUCN	END	BERN SÖZLEŞMESİ	MAK (2018-2019)	HABITAT
MAMMALIA	Memeliler						
CLASS: RODENTIA	Kemiriciler						

LATIN NAME	TURKISH NAME	RDB	IUCN	END	BERN SÖZLEŞMESİ	MAK (2018-2019)	HABITAT
SUB GROUP:	Fare Benzeri						
MYOMORPHA	Sincaplar						
FAM: SPALACİDAE	Körfareler						
SPECIES: SPALEX							
SP: SPALEX	Körfare	Nt	Nt	-	-	-	IN PRODUCTIVE AREAS AND
LEUCODON							IN GARDENS
FAM: MURİDAE							
SPECIES: RATTUS							CULTURAL LANDS, BY THE RIVER
SP: RATTUS RATTUS	Ev Siçani	Nt	Nt	-	-	-	IN THE BUSHES
GROUP: CARNİVORA	Yırtıcılar						
FAM: CANİDAE							
SPECIES: CANİS							
SP: CANİS	Köpek	Nt	Nt	-	-	-	EVERYWHERE
FAMİLİARİS	Köpek Amfibiler	Nt	Nt	-	-	-	EVERYWHERE
AMPHİBİA							
GROUP: ANURA	Kuyruksuz						
GROUP: ANURA	Kurbağalar						
SUB GROUP: PROCOELA							
FAM: BUFONİDAE	Kara Kurbağaları						
SPECIES: BUFO							
SP: BUFO VİRİDİS	Gece Kurbağası	Nt	Nt	-	ANNEX II	-	IN DRY AREAS
SP: BUFO VİRİDİS	Gece Kurbağası	Nt	Nt	-	ANNEX II	-	

Table 21: Fauna Species likely to be found in and around the Production Facility Area

The production facility is an area within the industrial area and there will be no flora and fauna destruction in the region. These animals, which can be observed in the area and in the near environment, do not need special habitats, can live in different habitats in different regions of our country, and their habitats are not destroyed.

2.4.2.2. Sancaktepe Management Building

Administration Building: The main fauna species of the region have been prepared with the research on which living species the region can be a habitat.

FAMILY	TURKISH NAME	HABITAT	END	R.D	MAK	SPECIES LIST	BERN	IUCN	STATÜ	N.B	TESPİT
Policeps nigricollis	Kara Boyunlu Papağan	Major Brackish Lakes Sometimes Freshwater Lakes	-	A.4	-	I-III	II	LC	Y	2	L
ANADATIE											
Anas querquedula	Çıkrıkçın	Richly Vegetated Fresh And Brackish Lakes And Reeds.	-	A.4	II	I-II	-	LC	Y	3	G
RALLIDAE											
Fulica atra	Sakarmeke	Shallow Reeds With Rich Vegetation	-	A.5	II	I-II	-	LC	Y	3	G
LARIDAE											
Ichthyaetus melanocephalus	Akdeniz Martısı	All Kinds Of Lakes In Brackish Waters, During Migration	-	A.3	-	I-III	II	-	Y	1	G
Larus canus	Küçük Gümüş Martı	Open Seas	-	B.2	I	I-II	-	LC	K	1	G
Larus cachinnans	Hazar Martısı	Coastal, Coastal And Wetlands	-	A.3	I	I-II	-	LC	Y	3	G
STERNIDAE											
Thalasseus sandvicensis	Kara Gagalı Sumru	Sea Sides	-	A.3	-	I-III	II	LC	Y	1	L
Sterna albifrons	Küçük Sumru	Brackish Lakes	-	A.3	-	I-III	II	LC	G	1	L
COLUMBİDAE											
Columba livia	Kaya Güvercini	Residency Areas Etc. ,	-	A.5	II	I-II	-	LC	Y	2	L
Streptopelia senegalensis	Küçük Kumru	Internal Neighbourhood Of Big Cities	-	A.4	I	I-II	-	LC	Y	1	G
APODIDAE											

Table 22: Fauna Species (birds) likely to be found in and around the Istanbul Headquarters Area

FAMİLYA	TURKISH NAME	HABİTAT	END	MAK	TÜR LİSTESİ	BERN	IUCN	N.B.	DETE CTİON
MURIDAE									
Rattus rattus	Ev Siçanı	Inland Residential Areas and Stream Banks	-	-	-	-	LC	2	G
Rattus norvegicus	Göçmen Siçan	Residential Areas in Ports and Big Cities	-	-	-	-	LC	1	L
Mus musculus	Ev Faresi	Residential Areas And Open Spaces	-	-	-	-	LC	2	L
Mus macedonicus	Makedonya Ev Faresi	Open Spaces	-	-	-	-	LC	1	L

Table 23: Fauna Species likely to be found in and around the Istanbul Headquarters Area

2.4.2.3 Izmir Sales and Service Office

The main fauna species of the region have been prepared with the research on which living species the area where the sales and service office is located can be a habitat.

FAMILY	SPECIES	TURKISH NAME	PHOTOGEOGRAPHIC REGION	PROTECTION STATUS			DANGER CATEGORY		SOURCE
				BERN	MAK	OSIB	IUCN	RDB	
ACCIPITRIDAE	Buteo buteo	Atmacagiller	BB/Y	ANNEX II	&	ANNEX III	LC	A.3	L
COLUMBIDAE	Streptopelia turtur	Güvercingiller	BB/G	ANNEX III	ANNEX II	&	LC	A.3	L
CORVIDAE	Pica pica Coloeus monedula	Saksağan Küçük Karga	BB/Y	ANNEX III	ANNEX II	&	LC	A.5	L

Table 24: Fauna Species (birds) likely to be found in and around the Izmir Sales Office Area

FAMILY	SPECIES	TURKISH NAME	PHOTOGEOGRAPHIC REGION	PROTECTION STATUS			TEHLİKE KATEGORİSİ		SOURCE
				BERN	MAK	OSIB	IUCN	RDB	
BUFONIDAE		Kara Kurbağasigiller							
	Bufo bufo	Kara Kurbağası	E., KBA., Krd. Ve Akd.	ANNEX III	-	-	LC	nt	L
	Bufo viridis	Gece Kurbağası	BB	ANNEX III	-	-	LC	nt	L
HYLIDAE	Hyla arborea	Ağaç Kurbağasigiller Ağaç Kurbağası	B. ve K. Anadolu	ANNEX II	-	-	LC	nt	L
AGAMIDAE	Agama stellio	Dikenli Keler	M. ve Krd. Hariç BB	ANNEX II	-	ANNEX III	LC	nt	L
CHAMAELEONIDAE	Chamaeleo chamaeleon	Bukalemungiller Bukalemun	Akd. ve E.	ANNEX II	-	ANNEX III	LC	nt	L
COLUBRIDAE	Eirenis modestus	Uysal Yılan	BB.	ANNEX III	-	ANNEX III	LC	nt	L
CANIDAE	Canis lupus	Kurt	BB	ANNEX II	---	ANNEX III	LC	nt	L
	Canis familiaris	Köpek	BB	---	---	---	---	nt	L
CRICETIDAE	Cricetulus migratorius	Hamstergiller Cüce Avurtlak	BB	---	---	---	LC	nt	L
FELIDAE	Felis domestica	Kedigiller Evcil Kedi	BB	---	---	---	---	nt	L
ERINACEIDAE	Erinaceus concolor	Kirpiggiller	BB	Ek III	---	Ek III	LC	nt	L

Table 25: Fauna Species likely to be found in and around the Izmir Sales Office Area

2.4.2.4. Ankara Sales and Service Office

The main fauna species of the region have been prepared with the research on which living species the area where the Sales and Service Office is located can be a habitat.

FAMILY	SPECIES	TURKISH NAME	HABITAT	END	DISTRIBUTION/ STATUS OF TURKEY	IUCN/	BERN	MAK	AYK
						RED DATA BOOK			
COLUMBIDAE	Columba Livia	Güvercingiller Kaya Güvercini	Forest Edges, Wooded Open Land, Farmlands, Farmlands, Fertile Plains		BB/Y	LC/A.3	ANNEX -III	EK-il	
	Streptopelia Turtur	Üveyik	Forest Edges, Wooded Open Land, Farmlands, Farmlands, Fertile Plains		BB/G	LC/A.3.1	ANNEX -III	EK-il	
CORVIDAE	Picapica	Kargagiller Saksığan	Agricultural Areas and Sparsely Wooded Areas and Bushes		BB/Y	LC/A.5		EK-il	
	Coloeus Monedula	Küçük Karga	Around And Inside Settlements, In Parks and Gardens, In Fields, On Rocks, In Ruins		BB/Y	LC/A.5		EK-il	
	Corvus Corax	Karakarga	High Plateaus, Rocky Beaches, Rocky Forests, Heaths, Mountainous Areas Where Livestock Is Made		BB/Y	LC/A.5	ANNEX -III	EK-1	
PASSARIDAE	Passer Domesticus	Serçe	Gardens, Parks, and Fields		BB/Y	LC/A.5		EK-il	
CUCULIFORMES	Cuculus Canorus	Gugukgiller Gugukkuşu	Prairies, Steppes, Forests, Parks and Gardens, Tundra and Peatlands, Heathlands, Swamps, and Dunes		BB/G	LC/A.2	ANNEX -III		EK-III
FALCONIDAE	Falco Tinnunculus	Doğangiller Kerkenez	Mountains, Valleys, Forest Edges, Steppes, Farmlands, Sea, Coasts, Even Cities		BB/Y	LC/A.2	EK-il		EK-III
HIRUNDINIDAE	Hirundo Rustica	Kırlangıçgiller Kir Kırlangici	Rural Areas, Small Cities, Cultivated Fields		BB/G	LC/A.5	EK-II		EK-UI
ACCIPITRIDAE	Buieo Buieo	Atmacagiller Şahin	Woodlands Close to Open Fields, Farmlands, Pastures and Swamps		BB/Y	LC/A.3	EK-II		EK-UI
STURNIDAE	Sturnus Vulgaris	Siğircikgiller Siğircik	Sparse Forests, Sparsely Wooded Open Lands, Farmland, Olive Groves, Parks, Orchards, Farms and City Centers		BB/Y	LC/A.5		EK-I	

Table 26: Fauna Species (birds) likely to be found in and around the Ankara Sales Office Area

FAMILY	SPECIES	TURKISH NAME	HABITAT	END	DISTRIBUTION / STATUS OF TURKEY	IUCN/ RED DATA BOOK	BERN	MAK	AYK
SALAMANDRIDAE	Triturus Vulgaris	Semenderler Pürtüklü Semender	Durgun Yada Yavaş Akan, Derin Olmayan, Küçük Ve Genellikle Bol Güneş Gören Sular.		Trakya, Marmara, Ege, Bati Akdeniz,	Lc/Nt	Ek-lii		
ANURA BUFONIDAE	Bufo Viridis	Gece Kurbağasi	Açık Arazilerdeki Taş Altları		Trakya, Bati Anadolu	Lc/Nt	Ek-Tf		
	Bufo Bufo	Kara Kurbağasi	Nemli Taş Altı, Toprak Oyuk Ve Çatlakları		Trakya, Marmara, Ege, Bati Akdeniz, Doğu Akdeniz, İç Anadolu, Bati Karadeniz,	Lc/Nt	Ek-lii		
RANIDAE	Rana Ridibunda	Su Kurbağaları Ova Kurbağasi	Bol Bitkili Su Birikintilerinde		Trakya, Marmara, İç Anadolu, Karadeniz, Doğu Anadolu, Güneydoğu Anadolu,	Lc/Nt	Ek-lii		
TESTUDINIDAE	Testudo Graceae	Tosbağagiller Tosbağa	Taşlık, Kumlu Ve Kuru Yerler		Tüm Bölgeler,	Vu/Nt	Ek-II	Ek-1	Ek-II
SQUAMATA LACERTIDAE	Lacerta Saxicola	Kaya Kertenkelesi	Çiçlak Ve Açık Arazilerde		Anadolu'nun Kuzey Ve İç Kesimlerinde	Lc/Nt			
	Lacerta Trilineata	İri Yeşilkertenkele	Yol Kenarlarındaki Bitkisi Bol Yerlerde		Trakya, Marmara, Ege, Bati Akdeniz,	Lc/Nt	Ek-II	Ek-1	Ek-lii
OPHIDIA TYPHLOPIDAE	Typhlops Vernicularis	Yılanlar Kör Yılanlar	Nemli Topraklar İçinde Ve Taş Altlarında		Trakya, Marmara, Ege, Akdeniz, Doğu Anadolu, Güneydoğu Anadolu,	Lc/Nt	Ek-Ttt	Ek-T	Ek-Ttt
COLUBRIDAE	Coluber Jugularis	Kirbaç Yılanları Karayılan	Taşlık, Çalılık		Akdeniz, Ege (İzmir'e Kadar) Ve Güneydoğu Anadolubölgesi	Lc/Nt	Ek-lii	Ek-1	
	Eirenis Modestus	Uysal Yılan	Taşlık		Tüm Bölgeler	Lc/Nt	Ek-II	Ek-1	Ek-lii
SCIURIDAE	Citellus Xanthaphrymnus	Sincapgiller Gelengi	Bozkırlarda, Kurak Yerlerde, Ekin Tarlalarının Kenarındaki Ekilmemiş Alanlarda, Bozkir, Çayır Ve Meralarda		İç Anadolu	Lc/Nt			Ek-Ui
FELIDAE	Felis Domestica	Kedigiller Evcil Kedi	İnsan Yerleşimleri		Bb	-/Nt			

FAMILY	SPECIES	TURKISH NAME	HABITAT	END	DISTRIBUTION / STATUS OF TURKEY	IUCN/ RED DATA BOOK	BERN	MAK	AYK
MUSTELLIDAE	Musiala Nivalis	Sansargiller Gelincik	Değişik Habitatlar, Orman, Bağ, Bahçe, Meskun Yerler		Bb	Lc/Nt	Ek-ii	Ek-I	
CANIDAE	Canis Lupus	Köpekçiller Kurt	Tundralar, Ormanlık Stepler, Açık Araziler		Bb	Lc/Nt	Ek-li		Ek-ii
	Canis Familiaris	Köpek	Her Türü Habitat		Bb	-/Nt			
LEPORIDAE	Lepus Europaeus	Tavşangiller Bayağı Tavşan	Otluk, Ormanlık Ve Açık Araziler		Bb	Lc/Nt	Ek-Ui	Ek-li	
ERINACEIDAE	Erinaceus Concolor	Kirpiggiller Kirpi	Açık Alanlar Ve Bahçeler		Bb	Lc/Nt	Ek-Ui		Ek-Ui

Table 27: Fauna Species likely to be found in and around Ankara Sales Office Area

The Turkish Environmental Legislation *Convention on the Conservation of European Wildlife and Habitats* and its annexes have been examined to determine the species taken under protection from the above-mentioned species.

If protected species are found in and around the COMPANY areas, the provisions of articles 6 and 7 of the Bern Convention, the decisions of the central hunting commission and the CITES Convention will be followed.

3 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN AND MITIGATION PRACTICES

3.1 Air Quality Management

The production facility has a letter out of scope *within the scope of Environmental Permit and License Regulation*. It is presented to you with Annex 1. Until this date, it has not carried out emission measurement as it is out of scope within *the Scope of the Environmental Permit License Regulation*.

Evaluating its activities within the scope of the Regulation on the Amendment of *the Environmental Permit and License Regulation* No. 31630 published on October 16, 2021, Annex-2 list of the regulation is '3.15 Warehouses, tanks, tankers, containers, doors, machinery etc. made of metal sheet with a raw material capacity of 3 tons/day and more producing plants1'. It has been seen that the Provincial Application for Conformity on the online portal on 27.12.2022 on air emissions within the scope of *Producing Facilities1*.

With the on-site inspection carried out by the Provincial Directorate of Environment, Urbanization and Climate Change on 24.02.2023, a deficiency notification was made through the system. The relevant deficiency letter is presented with Annex 12. As a result of the relevant deficiency letter, it was seen that the COMPANY had a carbon filter installed on the wet paint line and revised the Discharge Quality Control License (DQCL). As a result of the field visit, it was concluded that it will be subject to air emissions in accordance with Article 8 of the Regulation on Amendment to the Environmental Permit and License Regulation.

In accordance with the IFC ESG Guidelines for the Manufacture of Metal, Plastic and Rubber Products, the air emissions and limit values that may occur because of production activities are as follows.

Air Emissions from Metal Products Manufacturing	
Process	Air Emission
Sintering	Fugitive dust, particulates, carbon monoxide, sulfur dioxide, nitrogen oxides, chloride and fluoride compounds, VOCs (e.g., polystyrene vapors, hydrocarbons), metallic fumes (volatilized metal and metal oxides)
Metal Shaping	
Metal cutting, grinding and / or forming (including forging, wire drawing, pressing, stamping, among others)	Fume and cutting fluid mists [in processes where cutting / lubricating / cooling fluids are heated (e.g., wire drawing)]. In case of hot works or high wearing effects, some lubricants may decompose and produce VOCs
Thermal Treatments	
Quenching, annealing and other general treatments	Mist, VOC / solvents, fumes, particulates (e.g., chromium or nickel oxidized vapors)
Surface Preparation	
Abrasive treatments (e.g., shot, sand blasting)	Dust, comprising abrasive particles, metals, and metal oxides.
Solvent degreasing and emulsion, alkaline and acid cleaning	Solvents (associated with solvent degreasing and emulsion cleaning only), VOC, fumes, acid or alkaline vapors containing ammonia, ammonium chloride
Welding	Particulate, chromium (VI) and nickel oxidized vapors, ozone, vapors (as metals or as oxides of lead, cadmium, zinc, tin, iron, molybdenum, manganese, cobalt, vanadium, silica and silicates, fluorides, nitrogen oxides, carbon monoxide, carbon dioxide, phosgene (carbonyl chloride), phosphine
Surface Finishing	
Anodizing, chemical conversion coating, electroplating	Metal-ion-bearing mists and acid mists, hydrochloric acid, sulfuric acid, ammonia, ammonium chloride, zinc oxide, particulate matter, lead, copper, chlorine
Painting	Solvents
Other metal finishing techniques (Including polishing, hot dip coating, and etching)	Metal fumes and acid fumes, zinc oxide (from water quench), VOC, nitrogen oxides, particulate matter, sulfur oxide (from heating the zinc bath)

Table 28: Air Emissions from Metal Products Manufacturing

In the production facility, the final test process is carried out with the aim of controlling 100% of the machines produced. This process, facility cooling systems, production machines and forklifts used in the facility work with electricity. The facility uses **natural gas** in the heating and dyeing processes in its production facility. The main pollutants to be released into the atmosphere because of these activities are carbon monoxide (CO), nitrogen oxide (NOx) and particulate matter (PM). The sulfur compounds in the natural gas combination are too few to be considered.

Natural gas is used for heating in Sancaktepe, İzmir and Ankara offices. There is electricity consumption for the purpose of maintaining office work (ambient ventilation, refrigerator, beverage, and kitchen works, etc.).

COMPANY Emission sources:

- ✓ According to the raw material type and method because of the welding work,
- ✓ Particulate matter originating from the grinding process,
- ✓ Coatings, oils, greases and shielding gases on the purchased material,
- ✓ The use of natural gas used in the paint shop process and from heating,
- ✓ Generators,
- ✓ Evaporative emissions from oil/grease cleaning operations may occur.

In the production facility, the emission originates from the combustion system and process chimneys.

Emission sources and locations are given in the table below.

Production Facility Existing Flue List			
Flue No	Location / Function	Flue Material Type	Flue Geometry
1	Heat center cascade boiler chimney	Stainless	Spiro/Round
2	Heat center cascade boiler chimney	Stainless	Spiro/Round
3	Sponge coating hood exhaust fan	Galvanized	Spiro/Round
4	Paint shop drying tunnel exhaust fan	Galvanized	Spiro/Round
5	Paint shop oven tunnel exhaust fan	Galvanized	Spiro/Round
6	Paint shop furnace chimney (combustion chamber/burner)	Stainless	Spiro/Round
7	Paint shop drying chimney (combustion chamber/burner)	Stainless	Spiro/Round
8	Paint shop ambient exhaust fan (old wet paint booth)	Galvanized	Spiro/Round
9	Spray line tunnel exhaust fan (side suction)	Galvanized	Spiro/Round

Production Facility Existing Flue List			
Flue No	Location / Function	Flue Material Type	Flue Geometry
10	Spray line tunnel inlet exhaust fan	Galvanized	Spiro/Round
11	Spray line flue (combustion chamber/burner)	Stainless	Spiro/Round
12	Spray line tunnel exhaust fan (upper suction)	Galvanized	Spiro/Round
13	Powder coating filtration	Galvanized	Spiro/Round
14	Color powder coating filtration	Galvanized	Spiro/Round
15	Paint shop furnace chimney (combustion chamber/burner)	Stainless	Spiro/Round
16	Case manufacturing oxygen machine dust collection and space exhaust (BOMAKSAN / JPS-01)	Galvanized	Spiro/Round
17	Case/tank manufacturing plasma cutting machine acrobat arm and space exhaust (BOMAKSAN / JPS-06)	Galvanized	Spiro/Round
18	Tank manufacturing plasma cut (AJAN) filter	Galvanized	Spiro/Round
19	Case manufacturing welding tables, acrobat and space exhaust (BOMAKSAN / JPS-05)	Galvanized	Spiro/Round
20	Case manufacturing (new laser machine-warehouse side) welding machines acrobat and space exhaust (BOMAKSAN / JPS-07)	Galvanized	Spiro/Round
21	Tank manufacturing robot welding acrobat and space exhaust (BOMAKSAN / JPS-04)	Galvanized	Spiro/Round
22	Screw welding room acrobat and machining area exhaust (BOMAKSAN / JPS-03)	Galvanized	Spiro/Round
23	Machining lathe machines acrobat and space exhaust (BOMAKSAN / JPS-02)	Galvanized	Spiro/Round
24	Wet paint booth exhaust fan	Galvanized	Prismatic/Rectangle

Table 29: Emission Sources and Locations

In accordance with the Regulation on Control of Industrial Air Pollution, ‘The chimney height must be at least 1.5 m from the highest point of the roof. However, if the rated thermal power of the facility is below 50 kW, this height can be one meter.’ According to the article, it has been observed that the chimneys in the facility meet the physical conditions, the chimney lengths are over 1.5 m, and the thermal power is 1.94 mW.

In accordance with the Regulation on Control of Industrial Air Pollution, emissions resulting from production activities are included e-5 of the regulation.

Air emissions and limit values that may occur because of production activities in line with the IFC ESG Guidelines for the Manufacturing of Metal, Plastic and Rubber Products are as follows.

Air Emission Levels for Metal, Plastic, and Rubber Products Manufacturing		
Pollutants	Units	Limits
VOCs – surface cleaning	mg/Nm ³	20-75(1)
VOCs – metal and plastic coating	mg/Nm ³	100 (up to 15 ton/y solvent consumption) 75 (more than 15 ton/y solvent consumption) 50 (dryin processes)
VOCs – rubber conversion	mg/Nm ³	20(2)
TOC – rubber vulcanization	mg/Nm ³	80
Volatile Halogenated Hydrocarbon – metal surface treatments	mg/Nm ³	20
Particulate Matter – metal surface treatments	mg/Nm ³	5
Particulate Matter – plastic processing	mg/Nm ³	3
Hydrogen Chloride	mg/Nm ³	10
Nitrogen Oxides (3)	mg/Nm ³	350
Ammonia	mg/Nm ³	50
NOTES:		
<ol style="list-style-type: none"> As 30-minute mean for contained sources. 20 mg/Nm³ for waste gases from surface cleaning using VOCs classified as carcinogenic, mutagenic, or toxic to reproduction (risk phrases R45, R46, R49, R60, R61) with mass flow greater than or equal to 10 g/hour; and / or halogenated VOC classified with risk phrase R40 and having a mass flow greater than or equal to 100 g/hour); 75 mg/Nm³ for waste gases from other surface cleaning. Facilities with solvent consumption greater than 15 tonnes/year Dry air at 11 percent O₂ 		

Table 30: Air Emission Levels for Metal, Plastic and Rubber Products Manufacturing

The relevant limit values will be evaluated according to the limit values given above because of the emission measurement to be made.

Generators used in companies are one of the emission sources. It is included in the scope of Annex-5 article 7 *Internal Combustion Engines* of the Regulation on the Control of Industrial Air Pollution, published in *the Official Gazette* dated 03.07.2009 and numbered 27277. In case of 500 hours or more operation, emission measurement should be made in the chimneys of the generators. There are 3 generators in the Dilovası factory and 1 generator in the Sancaktepe branch. Generator information and 2022 operating hours are available in the table below. According to 2022 data, it has been observed that the working hours are below 500 hours and are not subject to emissions.

Generator Brand	Generator Brand	Thermal Power (kVA)	2022 Year of Use
TEKSAN GENERATOR	DBG1967	500 kVA	34 hour/year
TEKSAN GENERATOR	DBG1724	706 kVA	31 hour/year
TEKSAN GENERATOR	CKS3477	904 kVA	30 hour/year

Table 31: Dilovası Generator Working Table

Generator Brand	Generator Brand	Thermal Power (kVA)	2022 Year of Use
TEKSAN GENERATOR	TJ290BD5L	290 kVA	6 hour/year

Table 32: Sancaktepe Generator Working Table

Natural gas is used for heating in Sancaktepe, İzmir and Ankara offices. There is electricity consumption for the purpose of maintaining office work (ambient ventilation, refrigerator, beverage, and kitchen works, etc.).

Production Areas Indoor Air Quality

The ambient air quality limit values stipulated in the World Bank General ESG Guidelines are evaluated. In accordance with paragraph 18 of ESS1, 'When host country requirements differ from the levels and measures presented in the EHSs (Environmental Health and Safety Guidelines), the Borrower will be required to achieve or implement whichever is more stringent.' Therefore, the World Health Organization standards for the parameters SO₂, NO₂ and PM₁₀ must be complied with, in addition, the PM_{2.5} ambient air quality limit values provided in the World Health Organization guidelines will apply, since there is no limit value for this parameter in national legislation.

Parameter	Duration	Grid Value (µg/m ³)
SO ₂	10 minutes	500
	24 hours	40
NO ₂	hourly	200
	24 hours	25
	annually	10
Particulate matter (PM ₁₀)	24 hours	40
	annual	15
Particulate matter (PM _{2,5})	24 hours	15
	annually	5

Table 33: WHO Global Air Quality Guidelines Ambient Air Quality Limit Values

The COMPANY's environmental measurements report is presented in *Environmental Measurement Report* (Annex 3) and *Dust Measurement Report* (Annex 4). As a result of the measurements, the ambient measurement results are below the limit value of the World Health Organization.

In Sancaktepe, İzmir and Ankara offices, natural gas is used for heating. There is electricity consumption for the purpose of maintaining office work (ambient ventilation, refrigerator, beverage, and kitchen works, etc.).

3.2 Noise Management

The production facility has a letter out of scope within *the scope of Environmental Permit and License Regulation*. According to the activities included in the Annex-1 and Annex-2 list of *the Environmental Permit and License Regulation*, air emission, wastewater discharge and environmental noise have been evaluated according to the permissions, and the out-of-scope letter (Annex-1) has been presented. The Production Facility has been revised according to the activities included in the Annex-1 and Annex-2 list of the Regulation on the Amendment of the Environmental Permit and License Regulation No. 31630 published on October 16, 2021, and has been published in electronic form through *the Ministry of Environment, Urbanization and Climate Change E-Environmental Permit Application*. Provincial Director has made an Application for Conformity for the evaluation of air emission, wastewater discharge and environmental noise permits. Provincial directorate eligibility application is submitted with Annex 12.

Since the operation is out of scope according to the requirements of national legislation, noise measurement is not carried out in outdoor areas. The enterprise is in Makine İhtisas Organized Industry. There are no schools, hospitals, or settlements in the immediate vicinity.

IFC Performance standards address the *effects of noise beyond the ownership boundaries of facilities*, as stated in Article 1.7 of the Environmental, Health and Safety (EHS) Guidelines Environmental Noise Management. The limit values are as follows. The World Bank's Standards Noise limit levels are described under the Environment, Health, and Safety (EHS) Guidelines, General EHS Guidelines: Environmental Noise. Noise limit values are based on the World Health Organization Community Noise Guidelines. According to DBG's General EHS Guidance, noise effects should not exceed levels defined and specified by the same table or cause a maximum increase of 3 dB in background levels at the nearest off-site receiving location.

Noise Level Guidelines		
Receptor	One Hour LAeq (dBA)	
	Daytime 07:00 - 22:00	Nighttime 22:00 - 07:00
Residential; institutional; educational	55	45
Industrial; commercial	70	70

Table 34: Noise Level Guidelines

The COMPANY was advised to carry out noise measurement in this context.

3.3 Waste Management

Within the scope of the IFC ESG Directives for the Manufacture of Metal, Plastic and Rubber Products, the wastes that may occur in the COMPANY are as follows.

Solid Waste from Metal Products Manufacturing	
Process	Solid Waste
Sintering	Particulate, powders from
Metal Shaping	
Metal cutting, grinding and / or forming	Metal particles (e.g., iron filings, and chips or swarf arising from machining operations) metal-bearing machining fluid sludges, and solvent still-bottom wastes
Surface Preparation	
Solvent degreasing and emulsion, alkaline and acid cleaning	Process sludge(s)
Welding (including multiple pass technique)	Metal oxides (e.g., oxides of Ti, Al, Fe, Ni, Cr, Cu, Zn or Sn) and slag drops
Surface Finishing	
Anodizing, chemical conversion coating, electroplating	Metal sludge(s), base metal and reactive compounds
Painting	Still bottoms, sludge (s, dried), paint, and metals

Table 35: Solid Waste from Metal Products Manufacturing

Prevention and control measures under the Directive include:

- Separating metal dust or scrap by type to promote recovery and recycling,
- Reducing and treating slags from welding, forging, machining, and mechanical finishing, which may contain metal ions,

- Proper management of metals removed from wastewaters for recovery or disposal,
- Disposal of sludge from surface finishing processes (e.g., galvanizing, painting, hot dip).
- If reuse or recycling is not possible, the waste should be disposed of according to industrial waste management recommendations in the General EHS Guidelines.

Hazardous and non-hazardous wastes originate from production, infirmary, and office work at the production facility. Zero Waste Systematic has been established in office areas and a *Zero Waste Certificate* has been issued by the provincial directorate. Zero Waste Certificate is presented with *Zero Waste Certificate* (Annex 5).



Picture 6: Zero-Waste Stand

As a result of the field inspections, it has been observed that the wastes are separated at the source according to their types in accordance with *the Zero Waste Regulation* in the production areas.

There are enough waste bins located in different parts of the production area. The following chart shows the waste codes, waste types, disposal / recovery methods of the wastes generated at the facility.

Waste Type	Waste Code	Waste Content	Amount of Waste Generated in 2022	Source	Disposal Method / Recovery Method
Hazardous Waste	08 01 11	Powder paint	1050 kg	Dyehouse	R13
Hazardous Waste	15 02 02	Oily Cloth, Oily Gloves, Air Mask, Sharpening Stone, Sandpaper Waste, Oily Clothes, Oily Floor Scrubs	1175 kg	All Manufacturing Departments	R13
Hazardous Waste	15 01 11	Pressure vessels	765 kg	Case Manufacturing Dyehouse Machining SSH	R13
Non-hazardous waste	12 01 13	Welding Wastes		Screw Welding Room	R12
Non-hazardous waste	12 01 03	Brass Chips, Aluminum Chips	800 kg	Machining	R12
Non-hazardous waste	12 01 04	Aluminum Engine Housings, Aluminum Plate, Plate	-	SSH Screw Mounting Piston Assembly Machining	R12
Non-hazardous waste	12 01 01	Stainless Steel etc. sheet metal and casting parts	706093 kg	Machining Screw Welding Room Case Manufacturing Tank Manufacturing	R12
Non-hazardous waste	12 01 02	Slags After Welding	1680 kg	Screw Welding Room	R12
Hazardous waste	12 01 09	Boron Oil		Machining	R9
Hazardous waste	13 01 13	Other Hydraulic Oils	3020 kg	All Manufacturing Departments	R9
Hazardous waste	08 01 13	Paint Mud	355 kg	Dyehouse	R13
Hazardous waste	15 01 10	Contaminated Packaging	1125 kg	All Manufacturing Departments	R13
Hazardous waste	08 03 17	Toner, Cartridge	-	Administrative Offices	R13
Non-hazardous waste	15 01 01	Paper and Cardboard Packaging	4475 kg	Administrative Offices	R12
Non-hazardous waste	15 01 02	Plastic packaging	2620 kg	Administrative Offices	R12
Non-hazardous waste	15 01 06	Paper, Plastic and Glass Packaging	-	Whole Factory	R12
Non-hazardous waste	15 01 03	Wooden Packaging	2505 kg	Administrative Offices	R12
Hazardous waste	20 01 21	fluorescent lamp	-	Administrative Offices	R13
Hazardous waste	20 01 33	Batteries and Accumulators	-	Administrative Offices	D5
Hazardous waste	13 02 08	Other engine, transmission, and lubricating oils	-	SSH	R9
Hazardous waste	16 06 01	Leaded Batteries - (Battery)	411 kg	All Manufacturing Departments	R13
Non-hazardous waste	17 04 11	cables	700 kg	powerhouse	R12
Non-hazardous waste	17 04 01	Copper Bronze Brass	-	powerhouse	R12
Non-hazardous waste	17 04 02	Aluminum	-	Electricity - Maintenance - Screw Installation	R12

Waste Type	Waste Code	Waste Content	Amount of Waste Generated in 2022	Source	Disposal Method / Recovery Method
Non-hazardous waste	17 04 03	Bullet	-	Electricity - Maintenance - Screw Installation	R12
Non-hazardous waste	17 04 05	Iron And Steel	49420 kg	All departments	R12
Non-hazardous waste	17 04 07	Mixed Metals	-	All episodes	R12
Non-hazardous waste	16 02 14	Discard equipment other than 16 02 09 to 16 02 13	-	All episodes	R12
Non-hazardous waste	20 01 08	Biodegradable kitchen and canteen waste	-	All episodes	R12
Non-hazardous waste	20 01 39	Plastic Waste, Sponge Waste	2840 kg	Paint shop-screw mounting	R12
Hazardous waste	18 01 06	Chemicals Containing Hazardous Substances or Consisting of Hazardous Substances (For Outdated Drugs)	-	Infirmary	R13
Hazardous waste	16 02 13	Discard equipment containing dangerous parts other than 16 02 09 to 16 02 12	-	All episodes	R13
Hazardous waste	18 01 03	Wastes resulting from medical examination and dressing in the infirmary	36 kg	Infirmary	D5
<p><u>Recovery Procedures</u></p> <p>R9 Re-refining or other reuse of oils R12 Exchange of waste to be subjected to any of the processes R1 to R11 (1) R13 Intermediate storage of waste until it has been subjected to any of the processes specified in R1 to R12 (except temporary storage, collection within the area where the waste is generated)</p> <p><u>Disposal Methods</u></p> <p>D5 Landfill requiring special engineering (cellular storage isolated and covered from the environment and each separately, and so on)</p>					

Table 36: Wastes Generated at Facility

Within the scope of the requirements of the Enterprise National Legislation, *the Industrial Waste Management Plan* (Annex 6) prepared according to the requirements of the Waste Management Regulation has an *Industrial Waste Management Plan Approval Letter* (Annex 7) of approval by the *Provincial Directorate of Environment, Urbanization and Climate Change*.

According to the Waste Management Regulation, enterprises that generate one thousand kilograms or more of hazardous waste per month obtain a temporary storage permit from the provincial directorate for the areas / containers where they temporarily store their hazardous wastes. Permit for temporary storage area / container is given indefinitely.

The compliance of the area where the hazardous and non-hazardous wastes of the enterprise are stored with the requirements of *the Waste Management Regulation* was evaluated by the Provincial Directorate of Environment through on-site inspections and a *Temporary Waste Storage* permit was granted. The permission letter sent to the COMPANY by the Provincial Directorate is presented in *Temporary Waste Storage Permit* (Annex 8).

The existence of temporary waste storage and temporary hazardous waste storage areas was observed in the Production Facility. At the waste site:

- ✓ Reinforced concrete floor was applied to provide impermeability.
- ✓ Containers designed for metal waste are leakproof, and blind wells have been built in the container waste area against any spillage hazard.
- ✓ In the waste area divided into compartments, the signs regarding the waste codes are hung on the doors of the landfill and there are closed containers for the separate collection of wastes according to the waste code.
- ✓ In case of any fire hazard in the waste area, sufficient fire extinguishers are available in the area.
- ✓ The waste area is kept under lock and the waste officer was determined and the assignment letter and contact information were posted in the area.



Picture 7: Temporary Waste Landfill

Domestic wastes generated in the production facility are kept in sealed boxes and their disposal is managed by the OIZ.

The resulting hazardous wastes are delivered to licensed disposal / recycling companies by licensed transportation vehicles. For the wastes generated, transportation documents for Dangerous Goods Transportation are prepared at the delivery stage, and the wastes are labeled with UN numbers according to their types. Transportation and disposal / recycling activities are followed by the MOTAT system.

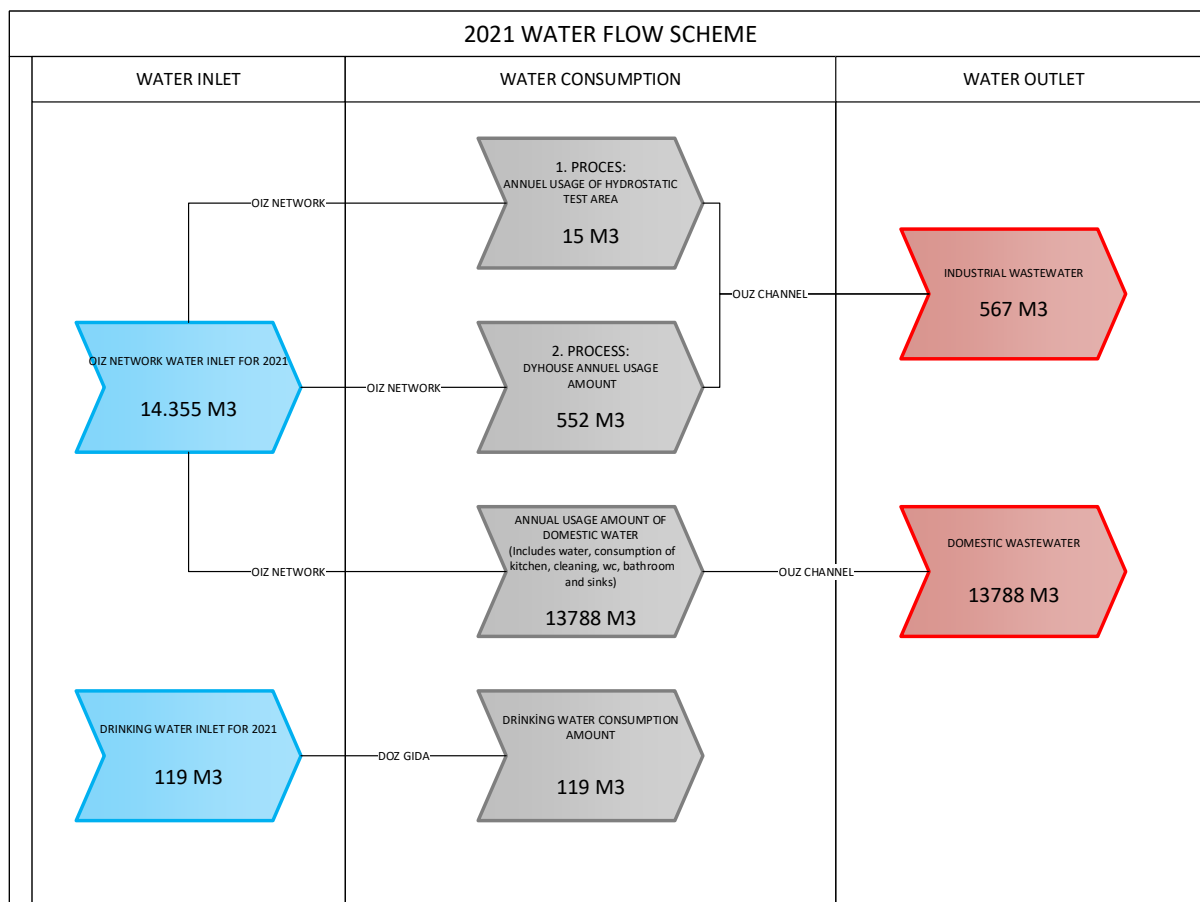
For the wastes generated because of the office activities in the Sancaktepe Management Building, the wastes are separated at the source with the waste containers positioned at certain intervals within the scope of *the Zero Waste Regulation* and delivered to the licensed recycling companies. Domestic wastes are kept in closed garbage containers of the municipality and disposed of by the municipality.

Since the number of employees in Ankara and İzmir sales and service offices is below the limit values specified in *the Zero Waste Regulation*, there is no obligation to obtain a *Zero Waste Certificate*. As per the operational policy, zero waste containers have been placed in the offices, and the wastes are collected separately at the source according to each waste class and delivered to the relevant municipalities.

3.4 Wastewater Management

Under the General Guidelines for Environment, Health and Safety, Wastewater Management includes water conservation, wastewater treatment, stormwater management and wastewater and water quality monitoring.

Wastewater within the scope of the production facility; It consists of domestic and industrial nature. The water flow chart regarding the water usage and wastewater amounts for 2021 within the scope of the production facility is as follows. Evaporation is not included in the calculation. The flow chart was created using water bills.



Shape 9: Mounting Production and Working Scheme

3.4.1 Industrial Wastewater

Industrial wastewater generated from industrial operations includes process wastewater, wastewater from utility operations, runoff from process and materials staging areas, and miscellaneous activities including wastewater from laboratories, equipment maintenance shops, etc. The pollutants in an industrial wastewater may include acids or bases (exhibited as low or high pH), soluble organic chemicals causing depletion of dissolved oxygen, suspended solids, nutrients (phosphorus, nitrogen), heavy metals (e.g., cadmium, chromium, copper, lead, mercury, nickel, zinc), cyanide, toxic organic chemicals, oily materials, and volatile materials, as well as from thermal characteristics of the discharge (e.g., elevated temperature). Transfer of pollutants to another phase, such as air, soil, or the sub-surface, should be minimized through process and engineering controls.

As a result of the production activities of the production facility, industrial wastewater originates from the process. Semi-finished products manufactured in the electrostatic painting process enter in nanotechnological washing lines. 15 tons of water in the lines circulates for 7 or 14 days and is then discharged into the channel of the OIZ. Relevant industrial wastewater is not classified as hazardous.

There is pressurization water in the closed-circuit pool in the area where the hydrostatic test of pressure vessels is performed. After being circulated for a year, on-site analysis is made by the OIZ, and it is discharged by being transported to a suitable channel indicated by the OIZ with a vacuum truck. Relevant industrial wastewater is not classified as hazardous.

As seen in the IFC EHS Guidelines for the Manufacturing of Metal, Plastic and Rubber Products, the wastewater likely to emerge in these sectors is as follows.

COMPANY Activities	Process Wastewater
Metal Forming	
Metal cutting, grinding, or forming	Waste machining fluids (e.g., ethylene Glycol, oil-based fluids; oil-water emulsions, synthetic emulsions) and alkaline wastes
Surface Preparation Process	
Welding	Dirty cooling bath used for quenching after welding
Alkaline cleaning	Alkaline wastes
Surface Finishing	
Dyeing	Solvent waste, spills

Table 35: IFC EHS Guidelines for the Manufacturing of Metal, Plastic and Rubber Products

Since there is no production process in the Sancaktepe, İzmir and Ankara offices of the COMPANY, industrial wastewater is not generated.

3.4.2 Domestic Wastewater

Sanitary wastewater from industrial facilities may include effluents from domestic sewage, food service, and laundry facilities serving site employees. Miscellaneous wastewater from laboratories, medical infirmaries, water softening etc. may also be discharged to the sanitary wastewater treatment system. Recommended sanitary wastewater management strategies include:

- Segregation of wastewater streams to ensure compatibility with selected treatment option (e.g., septic system which can only accept domestic sewage).
- Segregation and pretreatment of oil and grease containing effluents (e.g., use of a grease trap) prior to discharge into sewer systems.

- If sewage from the industrial plant is to be discharged into surface water, it must be treated to meet national or local standards for sanitary wastewater discharges or, in their absence, provide the guidelines applicable to sanitary wastewater discharges shown in the indicative directive.
- If sewage from the industrial facility is to be discharged to either a septic system, or where land is used as part of the treatment system, treatment to meet applicable national or local standards for sanitary wastewater discharges is required.
- Sludge from sanitary wastewater treatment systems should be disposed in compliance with local regulatory requirements, in the absence of which disposal must be consistent with protection of public health and safety, and conservation and long-term sustainability of water and land resources.

There are 765 people working throughout the COMPANY, including subcontracted employees.

According to Turkish Statistical Institute (TUSI) data (2020), the daily amount of wastewater discharged per capita was accepted as 189 lt/(person-day) and the pollution load was accepted as 54 g BOD5. The amount of water used daily was calculated as 171.360 lt/day. Assuming that all the water to be used by the personnel will turn into wastewater, the amount of wastewater to be generated is calculated as follows.

Wastewater amount = Wastewater amount discharged per capita x Number of people

$$=189 \text{ lt/day} \times 765 \text{ persons} = 144.585 \text{ lt}$$

The Discharge Quality Control License (Annex 9) of the Makine İhtisas Organized Industrial Zone, dated 08.06.2020 and numbered 2020-39, has been submitted with Annex 9.

Domestic wastewater generated in the production facility is given to the sewage system of the Organized Industrial Zone. Regarding the discharge of industrial and domestic wastewater, samples are taken every 6 months with the devices installed in the channel chimneys, and the collected wastewater is analyzed according to the discharge criteria specified in the *Direction of Discharge into the Sewer System* of the wastewater of the Makine İhtisas Organized Industrial Zone. OIZ discharge limits are as follows. The final analysis report is given in *Dalgakıran Wastewater Analysis Report (Annex 10)*.

When the results of the analysis *Dalgakıran Wastewater Analysis Report* are examined (Annex 10); The Makine İhtisas Organized Industrial Zone is below the limits of the *Discharge Regulations for the Sewer System* of wastewater.

PARAMETER	DISCHARGE LIMITS
Temperature(°C)	40
pH	6,5-10,0
Suspended Solids (mg/L)	2000
Oil and Gress (mg/L)	250
Tar and petroleum-based oils (mg/L)	50
Chemical Oxygen Demand (COD) (mg/L)	4000
Sulphate (SO ₄ =) (mg/L)	1700
Total sulfur (S) (mg/L)	2
Phenol (mg/L)	20
Free chlorine (mg/L)	5
Total Nitrogen (TN)- (mg/L)	100
Total phosphorus (P) (mg/L)	25
Arsenic (As) (mg/L)	3
Total cyanide (Total CN ⁻) (mg/L)	0,5
Total lead (Pb) (mg/L)	50
Total cadmium (Cd) (mg/L)	5
Total chromium (Cr) (mg/L)	100
Cr+6 (mg/L)	0,5
Total mercury (Hg) (mg/L)	0,2
Total copper (Cu) (mg/L)	15
Total nickel (Ni) (mg/L)	60
Total zinc (Zn) (mg/L)	150
Total tin (Sn) (mg/L)	5
Total silver (Ag) (mg/L)	5
Cl ⁻ (Chloride) (mg/L)	10000
Surfactants (MBAS) reacting with methylene blue (mg/L)	Biodegradation TSE The discharge of substances that do not comply with the standards is prohibited in principle.
Iron (Fe) (mg/L)	150
Fluoride (F) (mg/L)	50
Aluminum (mg/L)	20

Table 38: Predicted values Pretreatment standards for Machine Organized Industry Area
(<http://www.makineosb.org.tr/tr/sayfalar/makine-osb-yonergeler/269>)

Wastewater given to the canal is treated at the treatment plant of Makine İhtisas OIZ. *Ministry of Environment, Urbanization and Climate Change*; The discharge standards table has been determined on 17/12/2015 for the treatment plants to be built with the aim of purifying domestic and industrial wastewater that will originate from the Makine İhtisas Industrial Zones and discharged to the Dry Stream.

Parameter	Unit	Representative Snapshot or 2-hour Composite Sample
Chemical Oxygen Demand (COD)	mg/L	200
Suspended Solids	mg/L	100
Oil and Gress	mg/L	15
Total Phosphorus (P)	mg/L	2
Total Nitrogen (TN)	mg/L	15
Total Chromium	mg/L	2
Lead (PB)	mg/L	2
Total Cyanide (CN-)	mg/L	0,5
Mercury (Hg)	mg/L	0,2
Cadmium (Cd)	mg/L	0,4
Aluminum (Al)	mg/L	3
Iron (Fe)	mg/L	3
Fluoride (F-)	mg/L	50
Copper (Cu)	mg/L	3
Nickel (Ni)	mg/L	3
Zinc (Zn)	mg/L	5
Silver (Ag)	mg/L	0,1
Fish Bioassay (ZSF)	-	10
pH	-	6,9
Colour	Pt-Co	280

Table 36: Kocaeli Makine İhtisas Organized Industrial Zone Wastewater Treatment Plant Discharge Standards Table (Special Table)

The water treated by the treatment plant in certain periods is analyzed and its compliance with the wastewater discharge values is evaluated. The relevant report is requested and evaluated by the

COMPANY. The final analysis report prepared by the OIZ is given in *Dilovası Makine İhtisas OIZ Treatment Plant Wastewater Analysis Report* (Annex 11).

When the results of the analysis report are examined; Makine İhtisas Organized Industrial Zone wastewaters are below the limits specified in the IFC ESG Directives for the Manufacture of Metal, Plastic and Rubber Products. The relevant limits are presented in Table 37.

Effluent Levels for Metal, Plastic, and Rubber Products Manufacturing		
Pollutants	Units	Limits
pH	S.U.	6 – 9
COD	mg/L	250
TSS	mg/L	50 25 (electroplating)
Oil and Grease	mg/L	10
Aluminum	mg/L	3
Arsenic	mg/L	0.1
Cadmium	mg/L	0.1
Chromium (total)	mg/L	0.5
Chromium (hexavalent)	mg/L	0.1
Copper	mg/L	0.5
Iron	mg/L	3
Lead	mg/L	0.2
Mercury	mg/L	0.01
Nickel	mg/L	0.5
Silver	mg/L	0.2
Tin	mg/L	2
Zinc	mg/L	2
Cyanides (total)	mg/L	1
Cyanides (free)	mg/L	0.2
Ammonia	mg/L	10 20 (electroplating)
Fluorides	mg/L	20
Phenols	mg/L	0.5
Total Nitrogen	mg/L	15
Total Phosphorus	mg/L	5
Sulfide	mg/L	1
Volatile Organic Halogens (VOX)	mg/L	0.1
Toxicity	To be determined on a case specific basis	
Temperature increase	°C	<3a
At the edge of a scientifically established mixing zone which considers ambient water quality, receiving water use, potential receptors, and assimilative capacity.		

Table 37: Effluent Levels for Metal, Plastic and Rubber Products Manufacturing

Domestic wastewater generated in Ankara Sales Service Office is discharged into the OSTİM Organized Industrial Zone channel. Domestic wastewater generated in the Administration Building and İzmir Sales and Service Office is discharged into the channels of the connected municipalities.

3.5 Management and Pollution Reduction

The COMPANY has set targets in its 5-year strategic plan on environmental management and pollution reduction in 2019. These targets are revised every year according to the conditions of the day and included in the COMPANY plans. The table below is made by making use of the COMPANY targets action plan prepared by the COMPANY.

Waste Management

Work Plan Number	Target	Method	Rate	Date	Situation	Execution Date	Execution Rate	Explanation
PLN-021	Reducing the Amount of Powder Coating Waste	Process /New Investment	70%	2020	Completed	Mar.20	80%	New Powder Coating Line Has Been Made.
PLN-022	Reducing Paint Sludge Waste	Process /New Investment	70%	2020	Completed	Mar.20	100%	New Age Paint Line Has Been Made.
PLN-018	Reducing Sponge Waste Amount	Supplier Change	20%	2022	Completed	Jan.22	16%	Production is made according to product dimensions by working with alternative suppliers. It is thought that the target will be approached with Supplier Improvements.
PLN-015	Reducing the Amount of Contaminated Waste	Process /New Investment	50%	2020	Completed	Mar.20	80%	Manual Wiping Process Has Been Abolished with New Lines in The Paint Shop.
PLN-016	Reducing Metal Waste Rates	Design	25%	2023	Continues			Metal Case Designs are aimed to be shared.
PLN-010	Reducing Wood Waste Amounts	Process	20%	2023	Continues			It is aimed to establish a Pallet Repair Center.
PLN-008	Condensation of Oils Converted to Gas Form in Production Activities	Method To Be Determined		2022	Completed	Apr.22		Waste Oil Emission is Prevented by Putting Oil Separator in Machinery Ventilation Systems in Machining Department.
PLN-002	Reducing the Rate of Product Waiting in Stock / Reducing the Amount of Waste Oil	Forecast Planning	25%	2021	Completed	Dec.21	50%	The Oils Released During Maintenance from The Machines Waiting in Stock For 6 Months Have Been Reduced with Year-End Forecast Studies and Minimum Stock Arrangement.

Consumption of Resources

Work Plan Number	Target	Method	Rate	Date	Situation	Execution Date	Execution Rate	Explanation
PLN-001	Reducing Paper Consumption	Method To Be Determined	25%	2022	Completed	Dec.21	40%	Card Reading and Duplex Printing Features Have Been Switched to Printers.
PLN-004	Design of Products with Less Energy Consumption	Design		2023	Continues			
PLN-020	Switching to Low Energy Consumption Products in Office Equipment	Alternative Product	40%	2020	Completed	Jan.20		Energy Star Products Have Been Switched to Purchase and Rental of Printers and Equipment Used.
PLN-062	Transition to Electric Vehicles in COMPANY Vehicles	Alternative Product	70%	2023	Continues			

PLN-023	Reducing Water Consumption	Alternative Product	30%	2023	Continues			Regarding Water Consumption, it is aimed to select aerator system and balanced siphon in 2023.
PLN-063	Switching from Natural Gas to Electricity	Process /New Investment	80%	2025	Continues			Awaiting Return from Finance Department.

New Investments

Work Plan Number	Target	Method	Rate	Date	Situation	Execution Date	Execution Rate	Explanation
PLN-064	Dilovası Factory Ges Project	New Investment	1	2023	Continues			Awaiting Return from Finance Department.
PLN-065	Rainwater Collection Tank	New Investment	1	2024	Continues			Awaiting Return from Finance Department.

Management Studies

Work Plan Number	Target	Method	Rate	Date	Situation	Execution Date	Execution Rate	Explanation
PLN-070	Dilovası Factory Energy Audit	Outside COMPANY	1	2023	Continues			The program has been made for the month of June.
PLN-071	Establishment of Energy Management System	Existing Personnel	1	2023	Continues			The program has been made for the month of June.
PLN-072	Initiation of Product Carbon Footprint Studies	Existing Personnel	1	2024	Continues			September 2023 Program Has Been Done.
PLN-073	Initiation of Product Life Cycle Studies	Existing Personnel	1	2024	Continues			September 2023 Program Has Been Done.
PLN-074	Initiation of Corporate Carbon Footprint Studies	Existing Personnel	1	2023	Continues			March 2023 Program Has Been Done.
PLN-075	Initiation of Leed Certification Studies	Existing Personnel	1	2023	Continues			April 2023 Program Has Been Done.

Table 38: Table of Studies on Management and Pollution Reduction

The process will be monitored through monitoring audits to be carried out in line with these targets.

3.6 Subcontractor Management

The COMPANY has determined the rules and responsibilities with the *COMPANY Partners (Subcontractor) Management Procedure* for the works related to subcontractors. The basic principles in this procedure are as follows.

- ✓ COMPANY Partners are obliged to keep and supervise their employees only in relation to the contract work specified in the contract.
- ✓ COMPANY Partners are the main employer against their employees.
- ✓ Dalgakiran checks that the COMPANY Partners act in accordance with the requirements of the Labor Law towards their employees and that the services subject to the contract are provided in accordance with this contract framework.
- ✓ COMPANY Partners, the employee's payment documents (commitment) including the previous month's wage, overtime, week holidays, general holiday wages, annual leave fee,

until the 20-25th of the relevant month if the working interval is from the 15th to the 15th. If it works from 1 to 30 days, it is obliged to send it to Dalgakıran between the 5-10th of the next month from the relevant month.

- ✓ COMPANY Partners are obliged to make their own risk assessment and report to the main employer in accordance with the Occupational Health and Safety laws and regulations. Evaluations should be made in accordance with *the Occupational Health and Safety Risk Assessment Regulation*.
- ✓ COMPANY partners are obliged to comply with *ISO 14001 Environmental Management System* instructions.

The documents requested before the acceptance of the subcontractor are as follows. The OIZ Specialist checks the relevant documents. Subcontractor employees are allowed to enter the COMPANY, depending on their suitability.

- ✓ OHS Clerk Contract Sample (OHS Specialist and Workplace Physician)
- ✓ Last Month SGK Service List
- ✓ Temporary Assignment Letter
- ✓ OHS Training Participation Certificate
- ✓ Work at Height Education Participation Certificate
- ✓ Professional qualification/Education Certificate
- ✓ Recruitment/Periodic Health Report
- ✓ Personal Protective Equipment Debit Form
- ✓ Occupational Health and Safety Field Officer Appointment Letter
- ✓ Subcontractor/Contractor Risk Evaluation Form
- ✓ Construction Machinery Operator Certificate (If construction machinery will be used)

Subcontractor employees entering the COMPANY are informed by an OHS expert about the Occupational Health and Safety risks and emergencies in the COMPANY field before they start working.

Working with Sub-Contractors in COMPANY security, catering, cleaning, and transportation services.

Security Services:

Working with the SECURITAS security company in the production facility. Unarmed security guards carry out their duties at two security gates. There are 12 security guards (one female) working in two shifts and 6 security guards are on duty in each shift.

Working with the RSS security Company in the administration building. Unarmed security guards carry out their duties at two security gates. There are 7 security guards working in two shifts and 3 security guards are on duty during the day shift and 4 in the evening shift.

Cleaning Services:

Working with ISS Cleaning Company in the Production Facility and the Management Building. It works in a single shift. There are 15 and 5 cleaning staff, respectively, at the locations.

Food Services:

Working with KLÜH Catering Company in the Production Facility and the Management Building. It works in a single shift. 9 and 4 personnel work at the locations, respectively.

Transportation Services:

We work with AKKURLAR service and transportation Company in the Production Facility and the Management Building. It continues its services with 44 vehicles in its production facility and 15 vehicles and drivers in the Administration building.

3.7 Energy Efficiency Management

The COMPANY has prepared a project plan for energy efficiency to be realized in 2023. The energy board was established, its place in the organizational structure was determined, its assignments were made, and job descriptions were determined. Within the scope of these studies:

- Fulfilling *the Green Star Certification* requirements and realizing certification in 2023 to contribute to the management of institutions and organizations that will achieve the carbon-

neutral target for 2030 in accordance with the Sustainable Development Goals in the environmental, social, and economic fields,

- Realization of the GES (solar panels) project on the roof of the Production Facility in April 2023,
- Realization of certification by fulfilling the requirements of ISO 50001 Energy Management System standard in May 2023,
- January 2023 Carbon and water footprint verification,
- Establishment of Rainwater Collection system in 2023,
- Completion of the necessary studies for obtaining the Green Building certificate in 2023,
- Determination of renewable energy sources and preparation of necessary project plans.

To change consumption habits within the framework of energy management and to prevent unnecessary and unconscious use:

- Changes in systems, processes or equipment that consume energy have been identified and necessary studies have been initiated. Renewable energy sources that may occur in the machine test area and paint shop were determined and the project phase was started.
- Energy consumption and costs are monitored periodically, and training programs are organized to increase the knowledge and awareness of employees.

Annual information on energy use of the COMPANY and its studies on energy management should be reported to the Ministry by the end of March every year, and the energy audit of the production facility should be carried out within 2 years at the latest.

COMPANY will be carried out carbon and water footprint studies, energy audit, etc. It should take the process into an operable framework by setting numerical targets because of the data generated by such studies.

3.8 Occupational Health and Safety Management

Within the scope of the legal framework defined in this plan, risks that may affect health and safety, measures taken against these risks and management practices within the scope of National Legislation requirements, IFC Performance Standards, World Bank Environmental and Social Standards (ESS) Requirements and ISO 45001 Occupational Health and Safety standard requirements are listed below:

OHS measures are taken in line with the requirements of national legislation and international standards. Employees are informed about these practices through regular Occupational Health and Safety trainings.

ISO 45001 Occupational Health and Safety Management system was established in the COMPANY.

- ✓ Fire Emergency Plan, Earthquake Emergency Plan, Sabotage, Terror and War Emergency Plan, Electric Shock Emergency Plan, Accident-Health Emergency Plan, Accident-Incident Notification Form, Near-Miss Form, Accident-Incident. It has been observed that existing documents such as the *Follow-Up List*, *Falling Work Accident Emergency Plan*, *COVID-19 Emergency Plan and Emergency Procedure* have been implemented and recorded.
- ✓ 5 OHS specialists and 5 workplace physicians have been appointed separately in each region of the COMPANY.
- ✓ Risk assessment is carried out in the COMPANY on Health, Safety and Environment issues and the measures determined to prevent and/or minimize risks are implemented and recorded.
- ✓ Periodic medical checks of the personnel are carried out.
- ✓ Personal protective equipment (PPE) is given to the personnel in accordance with the work carried out and they are recorded. To increase its use by the personnel, various studies are carried out jointly by the OHS Specialist and the Human Resources Directorate.
- ✓ Subcontractors, OHS practices are audited by OHS experts.
- ✓ The infirmary and OHS room, which should be established within the scope of the Occupational Health and Safety Regulation, have been created in the COMPANY, and first aid equipment has been provided in appropriate areas.

- ✓ Signs with danger and warning signs have been placed at the COMPANY.
- ✓ Fire detection systems have been installed and maintenance records have been seen.

The measures to be taken by the COMPANY are as follows:

- ✓ Fall protection and fall arrest systems should be provided to the personnel during work at heights.
- ✓ Signs with danger and warning signs should be placed in the shipping areas.

3.9 Labor and Working Condition

3.9.1. Employment

There are 711 direct employees and 54 subcontracted workers recruited by the COMPANY. Of the 711 employees in the enterprise, 104 are women and 607 are men. The number of non-Turkish employees is 3, and 18 disabled employees and 3 foreign nationals are employed. The employment report of the COMPANY is as follows.

EMPLOYMENT NUMBERS			
	White Collar	Blue Collar	Total
Ankara	8	4	12
Male	7	4	11
Female	1		1
Başakşehir	7	9	16
Male	7	9	16
Bursa	3	4	7
Male	3	4	7
Sancaktepe 1	186	58	244
Male	118	57	175
Female	68	1	69
Dilovası	157	266	423
Male	125	265	390
Female	32	1	33
İzmir	5	4	9
Male	4	4	8
Female	1		1
Grand Total	366	345	711

Table 39: Employment Numbers

The COMPANY aims to select the personnel it will employ from people living in nearby locations in line with its carbon footprint targets and stakeholder participation after the process of moving to the Dilovası production facility.

3.9.2. Employing

In the recruitment of white-collar employees, requests are collected, or employees are reached through partner companies, web site and recruitment agencies (kariyer.net) and social media postings. For blue-collar employees, requests are collected through the website and recruitment agencies (www.kariyer.net).

The following documents are requested from all employees who will start work.

- ✓ For example, the population Register Certificate of Residence
- ✓ Education Certificate
- ✓ Judicial Registry Document
- ✓ Copy of Military Certificate
- ✓ Detailed Service Breakdown Document
- ✓ Vocational Qualification Certificate for Blue Collar Personnel
- ✓ Recruitment/Periodic Health Report

Human Resources and the relevant department manager conduct interviews with suitable candidates. Exams are held to determine the English levels, competencies, and abilities of the candidates, and then the proposal process is started.

The COMPANY makes an indefinite term contract with its employees. Newly recruited employees receive Occupational Health and Safety Training by an OHS Specialist before starting work. Then, the Human Resources Recruitment Specialist and the OHS Specialist introduce the COMPANY areas to the employees. Environmental awareness and *Waste Management* training is provided by the Integrated Management System Specialist separately for blue collar employees and separately for white collar employees. Before and after the trainings, Employees are tested, and Training Efficiency Evaluation is made. Trainings that need to be repeated are organized.

Employees who have just started work, have taken a leave of absence for more than 6 months, and have had a change of job, are interviewed by Human Resources, including the following items.

- ✓ About Dalgakıran

- ✓ Ethical values
- ✓ Human Resources Policy
- ✓ Employee Rights, Including the Employee Grievance Mechanism
- ✓ Hybrid Operation
- ✓ Rules to be Followed at the Breakwater
- ✓ Measures Taken Within the Scope of Combating Epidemics
- ✓ Reward Suggestion System
- ✓ Code of Professional Conduct
- ✓ Dress Codes
- ✓ Side Rights
- ✓ Social Activities, Clubs and Facilities at Dalgakiran

Within the scope of the contract, a trial period of 2 months is given to the new employee. An Orientation Training is initiated that will cover all stakeholders, specific to the department in which the employee will be assigned. As this training varies according to the department, it lasts at least 2 weeks and at most a month.

3.9.3. Human Resources Policies and Practice

In accordance with the requirements of Article 9 of the World Bank Environmental Social Standard ESS-2, the COMPANY shall: *'The Borrower will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers, including direct workers, and the way in which the Borrower will require third parties to manage their workers in accordance with paragraphs 31–33'.*

The COMPANY has established its Human Resources Policy on social responsibility principles and objectives. Human resources policies and procedures support the COMPANY's vision, mission, principles, and values. The social responsibility policies of the COMPANY include principles and understanding in parallel with corporate risk and management policies.

It has defined effective, inclusive, non-discriminatory, accessible, supportive, and respectful human rights bases in its Human Resources Policy.

The principles and principles that form the basis of Human Resources Policies are as follows:

- ✓ Equality of opportunity among employees is protected and supported.
- ✓ Qualified manpower is recruited in line with our COMPANY's goals and strategies.
- ✓ The *Right Person for the Right Job* principle is adopted and implemented.
- ✓ Employee motivations and their loyalty to the COMPANY are prioritized.
- ✓ The principle of non-discrimination has been adopted and is applied in all circumstances. Language, race, color, gender, political thought, belief, religion, sect, age, physical disability, and similar discriminations between employees are unacceptable and cannot be made.
- ✓ In the light of the principle of transparency first, it is the priority to work with the highest level of honesty in all COMPANY activities and COMPANY relations, and to avoid all forms of corruption, bribery, blackmail, and abuse.
- ✓ A working environment is created that will enable people with different beliefs, thoughts, and opinions to work in harmony,
- ✓ A transparent and open management policy is followed for our employees,
- ✓ Personal development is supported with continuous training,
- ✓ To develop the basis of social compliance, employees are regularly informed about their personal rights, COMPANY rules, and working conditions at the start of employment and during the working process.
- ✓ It creates a safe, healthy, and peaceful working environment in terms of an efficient work environment.
- ✓ Considers safety as a key element for employees and working conditions. Accordingly, it takes the necessary measures for safety and healthy working conditions.
- ✓ To constantly review, update and improve our Human Resources Policy.
- ✓ Keeps human resources systems and procedures up to date to adapt to changing conditions and requirements,
- ✓ Encourages individual contributions to the COMPANY and common goals.

The following procedures are applied in the Human Resources Directorate in the COMPANY.

- ✓ Performance Management Procedure
- ✓ Training Procedure
- ✓ Permission Procedure
- ✓ Recruitment and Termination Procedure
- ✓ COMPANY Travel Procedure
- ✓ Career Management Procedure

- ✓ Event Management Procedure
- ✓ Suggestion and Reward System Procedure
- ✓ Internal Communication Procedure
- ✓ General Workplace Rules and Safety Procedure
- ✓ Grievance Mechanism Procedure
- ✓ COMPANY Partners (Subcontractor) Management Procedure
- ✓ Human Resources Regulation
- ✓ Remuneration Regulation
- ✓ COVID 19 Measures and Rules to be Followed by Employees in the Workplace

3.9.4. Working Conditions

Human Resources Manager, Training and Development Group Manager, Wages and Benefits Group Manager, Senior Payroll to obtain information on discrimination, working conditions, access to drinking water and sanitation facilities, access to grievance mechanism, salaries, overtime and compensation on 12 December 2022, and Personal Affairs Specialist, Occupational Health and Safety (OHS) Specialist and Quality Assurance Specialists.

All employees are hired on a contract basis. Salaries and overtime payments are paid accordingly. There is a labor union in the COMPANY.

In the COMPANY, every employee has access to catering, cleaning, and transportation services.

For transportation services, Akkurtlar Tourism Company is working with. Route plans were made so that each employee would walk a maximum of 500 m in the mornings and evenings. Vehicles have been allocated to personnel working in manager and higher positions.

Meals are cooked on site in the Production Facility and Administration Building. Every working day, 4 dishes of food, yoghurt and salad bar are served. In the FGM meetings held, the employees stated that they could get as much food as they wanted. Working hours are planned, and separate meals are prepared according to the number of people. In Ankara and Izmir sales offices, the meals come from outside and the COMPANY pays for it.

It has an infirmary and OHS room where Production Facility experts are present. Areas designed in accordance with the legal requirements have been made ready for COVID 19 controls due to the

pandemic. In line with the interviews, there has been no fatal/major work accident in the history of the COMPANY.

Common areas such as dressing areas, dormitories and showers have been prepared according to the *COVID-19 and Hygiene Practices Evaluation Criteria to be Applied During the Pandemic* published by the Ministry of Health. It provides accommodation for overtime employees. Rest areas are designed for employees. There are gazebos in the outdoor areas, resting areas in the production areas, and table football, table tennis, etc. next to the cafeteria. There are areas where it is.

Personal protective equipment (PPE), which differs according to work areas, is delivered to the employees, and recorded. Surgical masks, gloves, disinfectants, etc. to prevent the spread of epidemic diseases. It is delivered to the employees in the amount requested. It has been observed that the hygiene requirements in the common areas are fulfilled. Employees are provided with work clothes, fleece coats, vests, and work shoes in winter. Work clothes are designed in different colors for work areas. According to the color of the clothes, it was provided to know which department the employees were in.

Focus group meetings (FGM) were held by randomly selecting 3 blue collar, 3 white collar, 3 women, 3 subcontractors, 3 disabled and 2 foreign employees from the COMPANY employee list. Meetings were held with each group separately from the management and human resources offices, in an area where there were no cameras and where they could feel comfortable. In the meetings, which lasted at least half an hour and where all participants were able to express themselves comfortably, questions were asked about employee rights, discrimination, evaluation of employee complaints and measures taken regarding epidemics.

They stated that there is no discrimination against women employees, and they have equal rights and working conditions with men. There are sanitary facilities in the same buildings, separate for men and separate for women. In the FGTs, the employees did not mention any dissatisfaction with the working conditions.

3.9.5. Additional Rights

The additional benefits package that the COMPANY offers to its employees is as follows. In the FGM meetings held, the employees stated that they were satisfied with the additional rights provided.

Additional Rights	Period in A Year	Terms
Bonus (1 Salary)	3	January - June - August
Shopping Voucher	2	Ramadan and the end of the year
Holiday Allowance	2	Ramadan and Sacrifice Feast
Holiday Chocolate/Turkish Delight	2	Ramadan and Sacrifice Feast
Shoe Aid	2	April - August
Towel & Soap Aid	2	April - August
Heating aid	12	Monthly
Annual Leave Allowance	1	1 time per year
Military Roadside Assistance		For enlisted employees
Birth Assistance		For employees with babies
Marriage Assistance		For married employees
Death Aid		For employees who have lost a first-degree relative
Christmas Basket	1	End of the year
Relocation Assistance		For employees moving from Istanbul to Kocaeli
Complementary Health Insurance	1	To all employees

Table 40: Additional Rights

In addition, white-collar employees at the COMPANY have been given the right to use hybrid work for a minimum of 4 and a maximum of 8 days per month.

3.10 Community Health and Safety Management

In the field of Community Health and Safety (CHS), COMPANY activities are evaluated separately, determinations and mitigation measures are determined and implemented. IFC Performance Standard 4: Community Health, Safety and Security document has been considered in determining the measures to be taken regarding public health and safety. The fact that the COMPANY activities are within the OIZ region and have a limited and controlled interaction with the residential areas ensures that the risks on the public health and safety of the COMPANY activities are at a low level. Some of the preventive measures taken on important issues related to public health and safety are given below.

- ✓ Developing the *Emergency Action Plan* to cover issues related to Community Health and Safety (see *Emergency Action Plan*),
- ✓ Creation and implementation of traffic management actions specified in this plan,
- ✓ Creation and implementation of security management actions specified in this plan,
- ✓ Making air quality measurements,
- ✓ Performing drills and practices related to emergency precautions.

3.10.1. Infectious Diseases

Possible sources, control measures, hygiene requirements and *Infection Prevention and Control Action Plan for Combating Epidemics* have been determined and implemented regarding infectious diseases that may affect public health and safety in COMPANY activities. It has been evaluated that a contagious disease that may occur during COMPANY activities may adversely affect the health of nearby settlements through employees and service provider personnel. The rapid detection of communicable diseases, the definition and planning of control measures, the provision of necessary medical support, and the taking of hygiene measures in common areas are important issues to be considered during COMPANY activities.

To prevent the occurrence of the COVID-19 epidemic, which is still effective today, spreading rapidly throughout the world and in our country and affecting hundreds of thousands of people, and to minimize the possible effects in case of contamination, the COMPANY, the *COVID-19 and Hygiene Practices to be Applied During the Pandemic* published by the Ministry of Health. It has a Healthy Workplace Certificate issued within this scope by fulfilling the *Evaluation Criteria*.

The COMPANY implements health and safety measures at all lifecycle stages. Having taken for granted new working models in the new world created by epidemics, the COMPANY has switched to the hybrid working model planned for its white-collar employees.

In all fields of activity, it has prepared and implemented the *Infection Prevention and Control Action Plan for Combating Epidemics* to fulfill the requirements of *COVID-19 and Hygiene Practices Evaluation Criteria to be Applied During the Pandemic* from employee entrances and exits to product entrances and exits, from common areas to meeting rooms.

In preparing these plans and procedures, official announcements from local / international authorities and the World Bank's Covid-19 Guide⁴⁶ will be considered, and the plans and procedures will be regularly updated according to updates of documents and announcements.

Some of the precautions taken regarding communicable diseases are given below.

- ✓ Health examinations of the employees at the start of employment and periodically,
- ✓ Employee, COVID-19 etc. in case of suspicion of being infected with a contagious disease, isolate, and refer to health institutions,
- ✓ Isolation of the employee until the tests performed by the health institutions are concluded,

- ✓ Compliance with the legal quarantine periods in case of infection with an infectious disease according to the test result,
- ✓ Providing appropriate masks that protect against COVID-19.

3.10.2. Emergency

Emergencies that may arise within the scope of COMPANY activities, occupational health and safety and community health and safety issues have been evaluated together in *the Emergency Action Plan (EAP)* and explained in detail. *The Emergency Action Plan* aims to consistently predict and eliminate the risks and effects that the COMPANY may face to prevent potential risks from turning into real problems, in line with national legislation and international standards.

An Emergency Action Plan has been prepared according to the road map determined in the *Emergency and Drill Preparation Procedure* to respond in a controlled manner to emergencies that may occur in the COMPANY and to evacuate the building when necessary.

The COVID-19 Emergency Plan and Emergency Procedure have been prepared to prevent the COVID-19 epidemic, which is still affecting the world and, in our country, and affecting hundreds of thousands of people, from being experienced in the COMPANY and to minimize the possible effects in case of contamination.

The Emergency Plan and the purpose of the procedures covering all COMPANY fields of activity; quick organization and action in emergencies. The objectives of the plans are as follows.

- ✓ To protect human health and life,
- ✓ Rescuing and treating accident victims,
- ✓ To protect and/or reduce the damage to the equipment and materials belonging to the enterprise,
- ✓ To prevent the spread, to control the event,
- ✓ Making the affected areas safe,
- ✓ To prevent environmental pollution,
- ✓ Maintaining equipment and records for emergency conditions and similar processes that may cause the event,
- ✓ To respond to the emergency as early as possible, to return to normal working conditions and to ensure COMPANY continuity,

- ✓ To provide the necessary information (health, safety, fire, security, risk management) to the management and COMPANY experts,
- ✓ To provide communication with state institutions and relevant private institutions in case of emergency.

The following are emergency situations that may affect health and safety, and that the COMPANY management must end by taking the incident under control with an emergency response.

- Serious injuries and deaths,
- Major damages to the goods/materials,
- Serious damages originating from off-site,
- Elements that threaten the continuity of the COMPANY,
- Threats to the safety of the COMPANY.

3.10.3. Accommodation Conditions

Employees who work overtime during COMPANY activities are provided with accommodation. There are suitable heating, cooling, and ventilation systems in the accommodation areas. Enough toilets and bathrooms are provided to the employees. The cleaning of the accommodation areas is carried out regularly by the ISS cleaning company. Rest areas are designed for employees to use. Social environments where employees can spend their free time are provided, gazebos in the outdoor areas, pinball, table tennis, etc. next to the cafeteria.

3.11 Traffic Management

One of the factors that will affect public health and safety is traffic. Measures are taken to determine the management of the movements of personnel vehicles and services, pedestrians, trucks, and other construction machinery originating from COMPANY activities. We work with AKKURLAR service and transportation services company in the Production Facility and Administration Building. It continues its services with 44 vehicles in its production facility and 15 vehicles and drivers in the Administration Building. Vehicles have been allocated to personnel working in manager and higher positions.

With traffic management, it is ensured that personnel transportation vehicles or COMPANY vehicles comply with traffic rules and restrictions in the OIZ, on highways and in nearby settlements during operational activities. Vehicle traffic due to COMPANY activity; It can create the risk of damage to the

employees, the employees of the COMPANY in its immediate vicinity and other stakeholders, the facility, the OIZ and its surroundings, and the infrastructure. The precautions taken to control these risks are as follows:

- ✓ Compliance with speed limits within the facility,
- ✓ Placing pedestrian roads, speed bumps and warning signs on the vehicle roads around the facility,
- ✓ Determining the operators of all construction machines throughout the enterprise and not allowing the use of unauthorized persons,
- ✓ Ensuring that personal vehicles are parked in the appropriate area by not allowing them to enter the COMPANY area,
- ✓ It is the determination of walking paths in the field of production activity.

3.12 Management of Cumulative Effects

In Performance Standard (PS) 1 published by the International Finance Corporation (IFC), cumulative effects are defined as follows:

“Impacts resulting from incremental changes in areas or resources used by or directly affected by the Project, of other existing, planned or reasonably identified activities at the time of identification of risks and impacts.”

Therefore, although the effects of an individual activity may be considered acceptable, it should be considered that the effects of COMPANY activities may have the potential to create a cumulative effect by interacting with the effects caused by other activities.

There are many industrial facilities in the OIZ region where COMPANY activities take place. Therefore, air pollution, water consumption, waste, employment, traffic, cultural heritage, biodiversity etc. It is considered that there may be a cumulative effect on the issues.

Industrial activities of the facilities located in the OIZ where the operation activities are carried out, heating in the nearby settlements, etc. and, air quality may be adversely affected due to activities and air emissions from vehicles using the roads located near the OIZ. Since there are no schools, hospitals, and settlements in the immediate vicinity of the OIZ, there is no cumulative impact from these activities. Natural gas is used in paint shop and heating systems. The main pollutants to be released into the atmosphere because of these activities are carbon monoxide (CO₂), nitrogen oxide (NO_x) and

particulate matter (PM). The sulfur compounds in the natural gas combination are too few to be considered. As a result of the measurements, the ambient measurement results are below the limit value of the World Health Organization. In the production facility, the emission originates from the combustion system and process chimneys. The production facility has a letter out of scope within the scope of *Environmental Permit and License Regulation* (The letter out of scope within *the Scope of Environmental Permit and License Regulation* is presented with Annex 1). Since the COMPANY is out of scope within the scope of national legislation requirements, it does not perform emission measurement. The Production Facility evaluated its activities within *the Scope of the Regulation on the Amendment of the Environmental Permit and License Regulation No. 31630* published on October 16, 2021, and made an Application for Conformity to the Provincial Manager (The relevant *Application Petition* is presented in Annex 2).

Another parameter that may cause a cumulative effect during COMPANY activities is noise. According to the activities included in the Annex-1 and Annex-2 list of *the Environmental Permit and License Regulation*, air emissions, wastewater discharge and environmental noise have been evaluated according to the permits, and the out-of-scope letter (Annex-1) has been presented. The Production Facility has been revised according to the activities included in the Annex-1 and Annex-2 list of the Regulation on the Amendment of *the Environmental Permit and License Regulation No. 31630* published on October 16, 2021. Provincial Directorate has made an Application for Conformity for the evaluation of air emission, wastewater discharge and environmental noise permits (*Provincial Directorate Conformity Application* is presented in Annex-2).

The enterprise is in the Makine İhtisas Organized Industrial Zone. No noise measurement is made in outdoor areas as it is out of scope according to national legislation.

Since the production facility is in the organized industrial zone, the presence of natural flora and fauna is out of question. The entire area where the facility is located is under anthropogenic influence. In accordance with the *Forest Law*, it is excluded from *Places Considered Forest Areas*. It is not possible for the Enterprise to have any cumulative impact on flora and fauna. There will be no destruction of flora and fauna around Sancaktepe Administration Building and İzmir Office. Since Ankara Sales and Service Office is in the organized industrial zone, the presence of natural flora and fauna is out of question. The entire area where the facility is located is under anthropogenic influence.

The COMPANY located in the Makine İhtisas Organized Industrial Zone will not have any cumulative impact on unidentified cultural heritage items that have the potential to be affected by its activities. There are no special areas defined as *Cultural Properties, Natural Assets, Site Regions* and *Conservation*

Area in the vicinity of the production facility and the Administration Building. According to the Protected Areas Map in the area where Ankara Sales and service office is located, National Parks, Nature Parks, Wetlands, Natural Monuments, Nature Protection Areas, Wildlife Protection Areas, Wild Animal Breeding Areas, Cultural Heritage, Natural Assets, Protected and Protected Areas There are no Biogenetic Reserves, Biosphere Reserves, Special Environmental Protection Areas, Special Protection Areas. There is no area around İzmir Office that will create cultural heritage items.

It is also necessary to evaluate the effects that will arise from the management of wastes generated during operational activities. There is an Industrial Waste Management Plan prepared in accordance with the requirements of the *Waste Management Regulation* within the scope of the requirements of the National Legislation covering all COMPANY activities. There is a letter of approval by the Provincial Directorate of Environment, Urbanization and Climate Change. Within the scope of *the Zero Waste Regulation*, wastes are separated at their source and delivered to licensed companies. Domestic wastes are given to the municipality. For the wastes generated because of the office activities in the Sancaktepe Management Building, the wastes are separated at the source with the waste containers located at certain intervals within the scope of *the Zero Waste Regulation* and delivered to the licensed recycling companies. Domestic wastes are kept in closed garbage containers of the municipality and disposed of by the municipality. Since the number of employees in Ankara and İzmir sales and service offices is below the limit values specified in *the Zero Waste Regulation*, there is no obligation to obtain a *Zero Waste Certificate*. As per the COMPANY policy, zero waste containers have been placed in the offices, and the wastes are collected separately at the source according to each waste class and delivered to the relevant municipalities.

It is important to evaluate the cumulative effect of water consumption and wastewater generated because of activities. Water consumed throughout the enterprise; It is provided as the daily use of the employee and the process water in the manufacturing processes. The production facility, Ankara sales and service office supplies the mains water from the OIZ to which it is connected, the Administration Building and İzmir Sales and Service Office are provided by the municipalities to which it is affiliated. The daily drinking water needs of the employees are provided from pet bottles provided by licensed companies. Wastewater within the scope of the production facility; It consists of domestic and industrial nature. Relevant industrial wastewater is not classified as hazardous. The domestic wastewater generated in the production facility is given to the sewage system of the OIZ. As a result of the analyzes made, the wastewater of the Makine İhtisas Organized Industrial Zone is below the limits of the *Discharge into the Sewerage System* (Annex 10). Domestic wastewater generated in Ankara Sales Service Office is discharged into the OSTİM Organized Industrial Zone channel. Domestic

wastewater generated in the Administration Building and İzmir Sales and Service Office is discharged into the channels of the connected municipalities.

It is a positive cumulative effect that is expected to increase employment within the scope of COMPANY activities.

4 STAKEHOLDER ENGAGEMENT PROCESS AND MANAGEMENT

As a requirement of the Environmental and Social Management Plan, the Stakeholder Engagement Plan was prepared within the scope of the COMPANY and presented as a separate document. The SEP prepared basically covers and targets the issues listed below:

- ✓ Determining the main and strategic stakeholders of the COMPANY,
- ✓ Defining the methods required to ensure effective communication with the identified stakeholders,
- ✓ Ensuring that the stakeholders are informed in a timely manner about the investments made, construction works and operational activities, and the possible environmental and social risks and impacts that may arise at these stages,
- ✓ Ensuring that the information and documents shared with the stakeholders are accurate and understandable,
- ✓ Ensuring that stakeholders and sensitive groups are included in the consultation processes to be carried out during the operational periods of the COMPANY,
- ✓ Ensuring that all relevant parties are involved in the process.

On December 2, 2022, the social impacts and status of the campuses with the stakeholders of the production facility, Administration Building and sales centers under the COMPANY umbrella were determined. Within the framework of this study, the stakeholders of the campuses were informed about this study and interviews were held about the social effects of the campuses and their approaches to social issues.

4.1 Identifying Stakeholders

Individuals, groups, and institutions/organizations that are affected by the COMPANY activities and performance, can affect these processes, or have a legal relationship with the COMPANY are considered as stakeholders.

Identifying stakeholders is a key step in the stakeholder engagement process. The main purpose of identifying stakeholders is, is to identify the persons, groups or institutions that may be directly or indirectly affected by the COMPANY and be related to the COMPANY, and to give priority to these persons, groups, and institutions. In this framework, individuals and groups that may be affected by the COMPANY are of particular importance due to their disadvantaged and/or sensitive situations.

The stakeholders identified within the scope of Dalgakiran Operations are presented in Table 44. Those outside the COMPANY Group are also known as External Stakeholders. In addition, Non-Governmental Organizations, Universities and Media were defined as indirect stakeholders within the scope of the COMPANY; Local Communities, Government Institutions and Organizations, Local Government Agencies, Credit Institutions and COMPANY have been identified as primary stakeholder (direct stakeholder).

Stakeholder Group	Stakeholders	Connection with the Facility
Districts and Local Communities Close to the FACILITY	<ul style="list-style-type: none"> ✓ Kocaeli Province Dilovası District ✓ Kocaeli Dilovası Makine İhtisas Industrial Zone ✓ Residents of Demirciler District ✓ Çerkeşli Neighborhood Residents ✓ Tavsanlı Neighborhood Residents ✓ Istanbul Province Sancaktepe District ✓ Eyüpsultan Neighborhood Residents ✓ Residents of Samandıra Neighborhood ✓ Ortadağ Neighborhood Residents ✓ Ankara Province Yenimahalle District ✓ Ostim Organized Industrial Zone ✓ Residents of Macunköy Neighborhood ✓ Residents of Bornova District of İzmir Province ✓ Residents of Işıkkent Neighborhood 	<ul style="list-style-type: none"> ✓ Environmental and social factors such as noise, air pollution and public health and safety ✓ Socioeconomic effects ✓ Local employment
State Institutions and Organizations	<ul style="list-style-type: none"> ✓ Ministry of Culture and Tourism ✓ Ministry of Environment and Urbanization ✓ Ministry of Agriculture and Forestry ✓ Ministry of Labor and Social Security ✓ Ministry of Transport and Infrastructure ✓ General Directorate of Land Registry and Cadastre 	<ul style="list-style-type: none"> ✓ Policy creation ✓ Permits and licenses required within the scope of the COMPANY ✓ Protecting the health and safety of workers and their local communities ✓ Environmental protection ✓ Conservation of biodiversity ✓ Infrastructure services and maintenance

Stakeholder Group	Stakeholders	Connection with the Facility
	<ul style="list-style-type: none"> ✓ Ministry of Health ✓ Ministry of Culture and Tourism 	<ul style="list-style-type: none"> ✓ Preventing the spread of communicable diseases and protecting public health
Local Government Organizations	<ul style="list-style-type: none"> ✓ Istanbul, Kocaeli, Ankara and Izmir Provincial Directorates of Environment and Urbanization ✓ Istanbul, Kocaeli, Ankara and Izmir Regional Forestry Directorates ✓ Istanbul, Kocaeli, Ankara and Izmir Provincial Directorates of Agriculture and Forestry ✓ Istanbul, Kocaeli, Ankara and Izmir Provincial Directorates of Culture and Tourism ✓ Regional Directorates of State Hydraulic Works ✓ Istanbul, Kocaeli, Ankara and Izmir Provincial Health Directorates ✓ Istanbul, Kocaeli, Ankara and Izmir Metropolitan Municipalities, ✓ Istanbul, Kocaeli, Ankara and Izmir Provincial Gendarmerie Commands, ✓ Sancaktepe, Dilovasi, Yenimahalle and Bornova Municipality ✓ Governorships of Istanbul, Kocaeli, Ankara and Izmir ✓ District Governorates of Sancaktepe, Dilovasi, Yenimahalle and Bornova ✓ Mukhtars 	<ul style="list-style-type: none"> ✓ Obtaining the necessary permits within the scope of the COMPANY ✓ Management of the environmental impacts of the COMPANY (such as waste and wastewater) and environmental audits ✓ Forest permits ✓ Preventing the spread of communicable diseases ✓ Protection of worker and public health and safety ✓ Consultation on the procedures to be done for the protection of cultural assets in case of accidental finds. ✓ Providing communication in case of emergency ✓ Security
Universities	<ul style="list-style-type: none"> ✓ Yıldız Teknik University ✓ Marmara University ✓ Kocaeli University ✓ Ankara University ✓ Ege University 	<ul style="list-style-type: none"> ✓ Getting technical support and consultancy
Non-Governmental Organizations (NGOs)	<ul style="list-style-type: none"> ✓ Machinery Manufacturers Association ✓ Turkish Environment Foundation 	<ul style="list-style-type: none"> ✓ Discussions and technical support on environmental and social impacts, economic development and employment issues
Credit Institutions	<ul style="list-style-type: none"> ✓ International Finance Institutions and Private Banks (TDIB and International Resources Affiliated to TDIB) 	<ul style="list-style-type: none"> ✓ COMPANY financing
Media	<ul style="list-style-type: none"> ✓ Local and National Newspapers ✓ Local Radio Channels ✓ Social Media 	<ul style="list-style-type: none"> Information sharing and advertising about the COMPANY
Company Group	<ul style="list-style-type: none"> ✓ COMPANY Employees ✓ Subcontractors and Employees 	<ul style="list-style-type: none"> ✓ COMPANY Environmental and Social Management System applications ✓ Employment ✓ Workforce and management
Local Stakeholders	<ul style="list-style-type: none"> ✓ District and Neighborhood Tradesmen 	

Stakeholder Group	Stakeholders	Connection with the Facility
	<ul style="list-style-type: none"> ✓ Companies and Production Facilities Located in the Surrounding OIZs and Campuses 	Environmental and social factors such as noise, air pollution, and public health and safety
Potential stakeholders	<ul style="list-style-type: none"> ✓ Buyers/customers/traders ✓ Raw material suppliers ✓ Vulnerable Groups: Persons with disabilities, female-headed households, landless-poor households/persons, ethnic minorities, immigrants, refugees, etc. 	<p>Commercial Relations</p> <p>Commercial Relations</p>

Table 41: Identified Stakeholders

4.2 Awareness Raising Tools and Methods

Sharing information about the COMPANY helps local communities and other stakeholders understand the opportunities as well as the risks and impacts associated with the COMPANY. In this way, stakeholders; The purpose, feature, and scale of the COMPANY; access to information such as the duration of the proposed COMPANY activities, the risks, and potential impacts to the communities in question and the mitigation measures taken against them, the envisaged stakeholder engagement process, and the grievance mechanism.

The COMPANY will use communication tools such as the media, website, brochures and information notes, correspondence, announcements, regular meetings, face-to-face meetings, and other information activities to provide consistent and transparent information to local communities, its employees, and other stakeholders. In this context, it will make the current website accessible by adding up-to-date information and documents related to the COMPANY.

Since the project site is located within the boundaries of the Organized Industrial Zone, the Public Participation Meeting was not held.

Environmental and Social Action Plan, Environmental and Social Management Plan, Stakeholder Engagement Plan etc. prepared within the scope of the COMPANY. The documents will be available on the website, in the COMPANY office.

When stakeholders are exposed to risks and adverse effects due to the activities within the COMPANY, a consultation process will be carried out to enable the stakeholders to express their views and to evaluate and respond to these views by the COMPANY Chief Executive Officer and Board Member. Consultation process: The risks of the COMPANY will be commensurate with the negative impacts and concerns expressed by the stakeholders. The issues listed below will be considered for an effective consultation process:

- ✓ The information shared during the consultation process will be in a simple format that local communities can understand, in an appropriate format, transparent, objective, meaningful and easily accessible.
- ✓ During the consultation process, the focus will be on the groups directly affected by the COMPANY rather than indirectly affected stakeholders.
- ✓ To the process to be managed well, it will be ensured that there is no external guidance, interference, and coercion.
- ✓ Outputs related to this process will be recorded.

In addition to implementing the grievance mechanism in case of complaints from stakeholders, the COMPANY will respond fully and in a timely manner to requests, comments, and questions from local communities. All requests will be treated with respect. Where it is not possible to fulfill a particular request, a detailed explanation will be given to the stakeholders as to why this is not possible.

4.3 Grievance Mechanism

4.3.1. Complaints Mechanism Requirements

According to the requirements of the World Bank Environmental Social Standard ESS10 clause 26, the Company *'The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.'* That's the why a complaint mechanism has been established within the scope of the COMPANY to learn the concerns and complaints of employees and external stakeholders regarding the environmental and social performance of the COMPANY and to help them to be eliminated. In this process, the possible risks and possible negative effects of the COMPANY have been taken into consideration.

According to Item 2 of Annex A to ESS10 the grievance mechanism may include the following:

- a) Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, e-mail or via a website,
- b) A log where grievances are registered in writing and maintained as a database,
- c) Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgment, response, and resolution of their grievances,
- d) Transparency about the grievance procedure, governing structure, and decision makers; and

- e) An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

Complaints are complaints, suggestions and problems expressed by employees and external stakeholders on a particular issue. The range of complaints ranges from large and potentially illegal issues, such as discrimination or victimization in the workplace, to smaller day-to-day disputes of local stakeholders or Project Affected Persons (PECs).

The Complaints Mechanism provides an open and transparent framework for dealing with challenges. The complaint mechanism is a structured process that allows complainants to handle disagreements, fears and wishes, concerns in a fair, easily accessible and transparent manner.

The complaints mechanism will inform stakeholders to be aware of the process, to be informed about the right to lodge a complaint, to understand how the mechanism will work and how to handle their complaints. It aims to urgently address the concerns that stakeholders may have by using a culturally appropriate, transparent, and understandable consultation process. The party who voices his concern or complaint shall not face any costs or sanctions.

4.3.2. Contact Details

In most cases, a complaint can be made by a stakeholder or local resident in person or via telephone, letter, complaint boxes or email using the following contact information:

Dalgakiran Machine Contact Details.

- ✓ Name-Surname: Administrative Affairs Manager Orhan Akinci
- ✓ Phone: +90 (0216) 311 71 81
- ✓ E-mail: orhanakinci@dalgakiran.com

Turkey Development and Investment Bank (TDIB) Contact Details.

- ✓ Name-Surname: Turkey Development and Investment Bank
- Any party that is directly and/or significantly affected by the environmental risks that may arise from the Bank's operational and financing activities may file a complaint with the Bank. Complaints received are systematically documented and responded to in a timely manner. For your complaints, you can fill out the form on our Contact page.

- ✓ Link: <https://kalkinma.com.tr/bizi-taniyin/cevreci-kalkinma/cevre-sikayet-mekanizmasi>

World Bank (WB) Contact Details.

- ✓ Name-Surname: World Bank
Complaints must be in writing and addressed to the GRS.
- ✓ E-mail: grievances@worldbank.org

Online Form: <https://wbgcmgrs.powerappsportals.com/en-US/new-complaint/>

4.3.3. Principles of Complaint Mechanism

The complaint mechanism has been developed to include the following.

- ✓ **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative steps. It will also be fair, transparent, and informative for interested persons.
- ✓ **Up-to-dateness:** The process will be reviewed on a regular basis jointly by the SSP and the HSE Department Chief.
- ✓ **Confidential and impartial process, without punishment:** The process will be carried out in a confidential and impartial manner without employees being afraid of being punished.
- ✓ **Reasonable timeline:** A certain period will be monitored for the delivery of responses and the resolution of the specified issues: this is the period set for resolving the complaint is 30 working days.
- ✓ **Keeping records:** Complaints are monitored and recorded as hard and electronic copies, if possible, in written form.

Employees should not experience retaliation for voicing their concerns through such mechanisms.

4.3.4. Complaint Mechanism Steps

The following steps must be followed to the complaint mechanism to be implemented effectively.

- The complaint mechanism is prepared by considering the environmental and social risks and possible effects of the COMPANY,

- The process is designed in a way that is easily understandable, accessible, reliable, and culturally appropriate.
- Employees and external stakeholders will be informed about where, to whom and how to deliver their complaints.
- A response period for incoming complaints (e.g., 15 days) will be determined and this period will be adhered to.
- By providing feedback to local communities, employees and other stakeholders, the actions taken regarding their concerns and complaints and the outcome of these actions will be announced.
- The necessary records regarding all transactions will be kept and reported to the TDIB annually.

4.3.5. Registration and Evaluation of Complaints

4.3.5.1. Recording and Evaluation of Internal and External Complaints

Internal and external complaints will be collected, recorded, and evaluated as follows:

- Following the receipt of the records according to the type of complaint, the process will be initiated by the Human Resources Directorate.
- Incoming complaints will be recorded in the database.
- The complaint will be directed to the relevant unit and a preliminary evaluation will be made on the subject.
- The necessary actions and measures for the resolution of the complaint will be determined and implemented.
- If the complainant has specified his name and contact information in the complaint forms, he will be informed within five working days after the start of the process. Likewise, if the complaint is resolved, the complainant will be informed within a maximum of 15 working days.
- Once the complaints have been resolved by agreement with the complainant, the complaint will be closed by the person responsible.
- If that the complaints cannot be resolved within the specified period for a reasonable reason, the parties to the complaint will be explained and informed about the extension of time.

The responsibility in connection with the subject of the complaint will be in the Human Resources Directorate. If necessary, the complaint may be handled by all responsible parties.

Employees and external stakeholders should know who and how to contact them if they have suggestions, wishes and complaints. In addition, in this context, the responsible parties should have detailed information about the operation of the complaint mechanism and related procedures.

4.3.5.2. Recording and Evaluation of Employee Complaints

Internal complaints from employees will be received as outlined below:

- All operating personnel and field employees (including subcontractors) will be informed about the complaint mechanism during the recruitment process.
- The OSH trainings, which will be repeated periodically, will also include the functioning of the complaint mechanism and the stakeholder participation process.
- To receive internal complaints, complaint/suggestion boxes will be placed in places where employees can easily access the COMPANY SITE. In areas where there are complaint / suggestion boxes, no images will be taken with the camera.
- In case of complaints such as discrimination, harassment, violence, lack of livelihood, mobbing, etc. that may lead the person to suicide, the employee will be isolated from the working environment and the complaint will be discussed in the Ethics Committee of the COMPANY, evaluated in detail and decided immediately.

4.3.5.3. Recording and Evaluating Complaints from Local Communities and Other External Stakeholders

The following practices will be implemented to receive complaints and/or suggestions from local communities and other external stakeholders.

- Detailed information about the complaint mechanism will be provided at the stakeholder participation meetings.
- The channels through which complaints/suggestions can be forwarded will be broadcast to all stakeholders.
- Applications made through the website can be received through the external complaint form.
- Stakeholders will be informed on how to submit their complaints.

4.3.6. Complaint Mechanism Communication

In the event of any complaints, employees will be provided with and access to know to whom to report their complaints. Contact is shared in 4.3.2.

For the collection of internal complaints from employees:

- The complaints mechanism process is communicated with all employees (including the contractor's employees) throughout the recruitment process and orientation trainings should also include stakeholder engagement and the complaints mechanism process.
- Complaint/suggestion boxes should be made available in all areas of activity of the COMPANY for internal complaints.



Picture 8: COMPANY Complaint Boxes

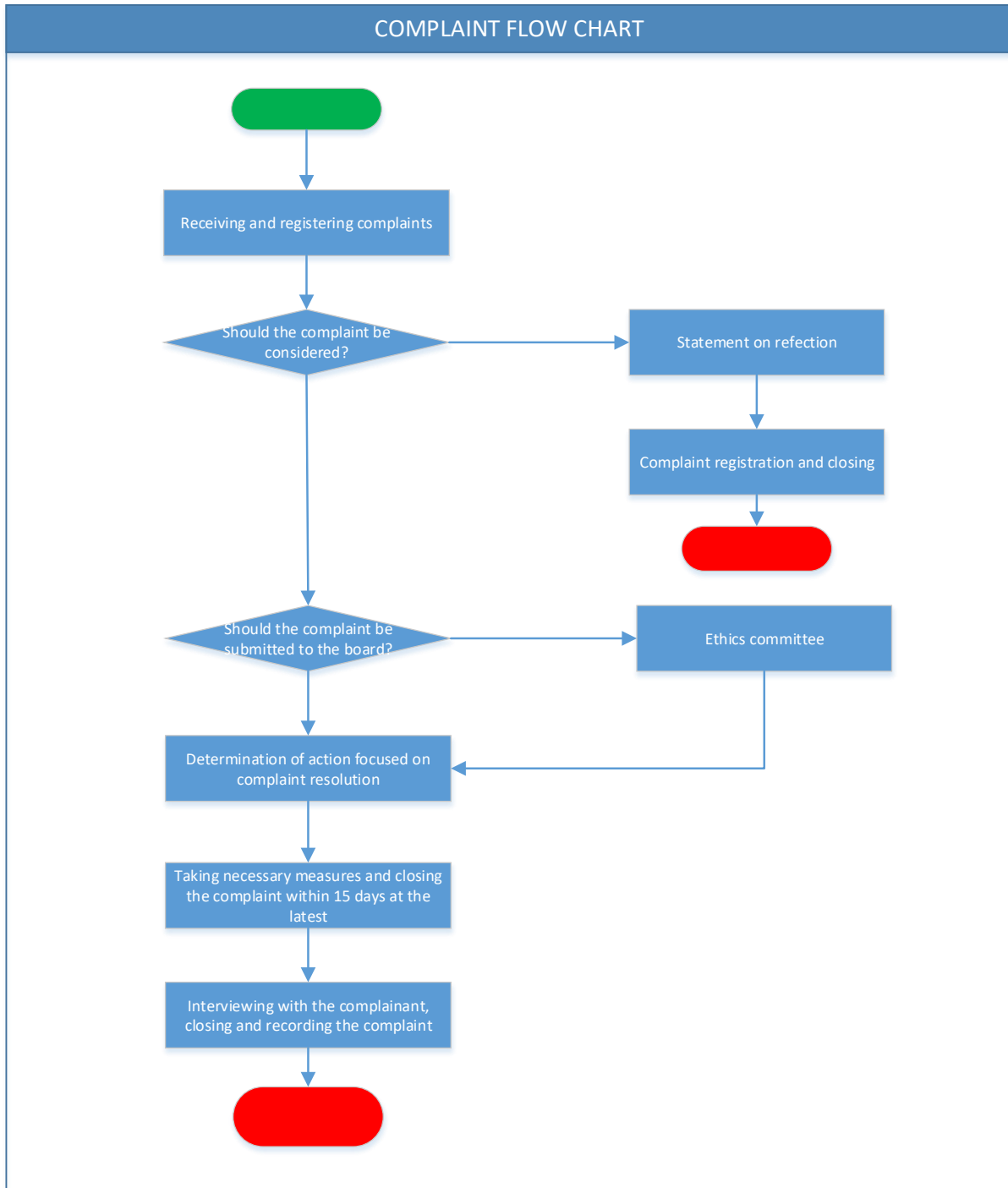
- All employees should be informed of the location of the complaint / suggestion boxes and how to forward their complaints (via the website or complaint / suggestion boxes).

For the collection of external complaints from the Community:

- The complaints mechanism process should be communicated with external stakeholders during stakeholder engagement meetings (including the location of complaint / suggestion boxes).

- Complaint / suggestion boxes should be made available at the mukhtars in the nearest settlements or at the meeting points of the villagers (coffee houses, etc.).
- Stakeholders should be informed of the location of the complaint / suggestion boxes and how to communicate their complaints (via the website or complaint / suggestion boxes).

As of 2020, the COMPANY receives and evaluates complaints in its Production Facility as stated in this ESMP. It should carry out the relevant work in all its locations and cover all employees. *The Grievance Mechanism Flowchart* is shown in Shape 10.



Shape 10: Complaint Flow Chart

5 MONITORING PLAN

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
Air Quality	Actions to be taken at the end of the provincial directorate's review within the scope of the regulation on making changes in the environmental permit and license regulation	Decision taken because of provincial eligibility letter. emissions report The environmental permit Records on the grievance mechanism Field observations and inspections	Chief Executive Officer and Board Member		
	According to article 11 of the environmental permit and license regulation, in case of any change in the activities or capacity of the facility, the necessary applications regarding the revision of the environmental permit	Capacity Report			
	Periodic maintenance of machinery and equipment that will cause emission sources	Maintenance records			
	Process improvement studies that cause emission sources	-3.5. Compliance with management and pollution reduction objectives. *PLN-021 / reducing the amount of powder coating waste (paint shop emission chimney) *PLN-022 / reducing the amount of paint sludge waste (wet paint line emission chimney) *PLN-008 / condensation of oils that turn into gaseous form in production activities *PLN-063 /conversion from natural gas use to electricity use			
Noise and Vibration	Avoiding noise-causing activities at night by maintaining construction equipment	Overtime work Maintenance records	Chief Executive Officer and Board Member		
	Reducing the noise level by taking necessary precautions (isolation, silencer, etc.) in case of using equipment and machines with high noise level	Records regarding the grievance mechanism Noise measurement reports			

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
	Preventing unused vehicles and equipment from being left in working condition	Job starts and end protocol			
Wastewater	Domestic and industrial waste waters generated by the enterprise are discharged into the OIZ's channel. Waste-water samples are taken from the enterprise at certain intervals by the OIZ and the relevant parameters are analyzed. Evaluation of analysis results and situations that require action	Discharge quality control license Gray water footprint Operational wastewater analysis reports Records on the grievance mechanism Field observations and inspections	Chief Executive Officer and Board Member		
	The water discharged to the OIZ is treated at the OIZ's treatment plant and is analyzed and discharged at certain periods. Evaluation of analysis results and situations that require action	OIZ treatment plant wastewater analysis report			
	Activities to reduce the generation of industrial wastewater	3.5. Compliance with management and pollution reduction objectives. *PLN-022 / reducing the amount of paint sludge waste (paint process causes industrial wastewater)			
	Activities to reduce water consumption	Aerator application Balanced siphon system Water footprint report			
	A rainwater collection system will be built in the production facility. Contamination of rainwater with chemicals, oil or other dangerous substances should be avoided. Waste and other hazardous materials should be stored in closed areas where rainwater cannot come into contact. Monitoring the work to be done	Rain collection system			
Waste	Monitoring the implementation of the waste management plan	Waste disposal/recycling records Industrial waste management plan approval Contracts with licensed companies MOTAT records Non-hazardous waste tracking chart Field observations and inspections	Chief Executive Officer and Board Member		

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
	Adequacy of temporary waste storage areas and compliance with the legislation	Temporary storage permit Field observations and inspections			
	Waste reduction measures	3.5. Compliance with management and pollution reduction waste management objectives.			
Energy efficiency	The number of natural resources used will be recorded and it will be aimed to reduce the use of natural resources every month in line with the resource efficiency target.	Natural resource consumption watch list			
	Applications will be made to reduce the use of natural resources such as the collection of rainwater and its use in production, the installation of solar panels.	3.5. Management and pollution reduction align with new investment targets.			
	Action plans will be made to reduce carbon footprint.	3.5. Compliance with management and pollution reduction resource consumption targets.			
	Action plans will be made to reduce water footprints.	Carbon footprint report Qerator application Balanced siphon system Water footprint report			
	Goals within the scope of sustainability	3.5. Compliance with the objectives of management and pollution reduction management studies.			

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
Soil	Fuels, engine oil and other chemicals are stored in a central chemical storage area, and all kinds of precautions are taken against the spillage of these substances in soil and groundwater in the areas where they are stored. There are spill kits in these areas. Additional measures will be taken depending on the nature of the substance or the sensitivity of the receiving environment.	Accident records Field observations and inspections Records on the grievance mechanism Land declaration			
	Annual drills are held against chemical spills.	Practice records			
Working conditions	The enterprise shall, at a minimum, comply with national labor, social security and occupational health and safety laws and the basic principles and standards contained in national labor, social security and occupational health and safety laws and ILO conventions 105 (forced labor), 87 (freedom of association), 98 (right to collective bargaining), 100 and 111 (discrimination), 138 (minimum age) 182 (worst forms of child labor)	Field observations and inspections	Chief Executive Officer and Board Member		
	Ensure that all Employees have access to and are aware of the Grievance Mechanism	Employee satisfaction surveys records on the grievance mechanism			
	Establishing and maintaining a good worker management relationship	Focus group meetings Field observations and inspections Employee satisfaction surveys Records on the grievance mechanism			
	Promote fair treatment, non-discrimination, and equal opportunities for workers	Focus group meetings Field observations and inspections Employee satisfaction surveys Records on the grievance mechanism			
	Preventing child and forced labor	Focus group meetings Field observations and inspections Employee satisfaction surveys Records on the grievance mechanism Employment certificate			

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
	Provide hygienic and adequate facilities to employees and ensure that toilets and dressing rooms are separated for male and female employees	Focus group meetings Field observations and inspections Employee satisfaction surveys Records on the grievance mechanism			
	Ensuring workers have access to primary health care in the field and issuing prescriptions	Infirmity visit Focus group meetings Field observations and inspections Employee satisfaction surveys Records on the grievance mechanism			
Stakeholder Engagement	Schedule adequate time to interact/communicate and participate with communities Ensure regular consultations with local authorities and communities about the management of the facility	Meeting Minutes Grievance Mechanism Stakeholder Engagement Plan	Chief Executive Officer and Board Member		
Grievance Mechanism	Engage an effective Grievance Mechanism to allow affected individuals to express concerns about the Facility	Records Regarding the Grievance Mechanism	Chief Executive Officer and Board Member		
Community Health and Safety	Developing an occupational health and safety management plan to identify health and safety risks for each activity, then identifying and implementing appropriate mitigation measures and necessary personal protective equipment,	Records regarding the grievance mechanism	Chief Executive Officer and Board Member		
	Recording of all accidents and incidents	Occupational accident records / near miss records			
	First aid training	Education records			
	Establishing health and safety management for employees and the community in accordance with occupational health and safety (OHS) law and related regulations, as well as in accordance with relevant IFC policies and best practices.	Field observations and inspections			

Title	Mitigation, Management and Remediation Measures	Measurement/Indicator/Activity	Completion Status and Solution Suggestions	Completion Status and Solution Suggestions	Evaluation
	Health and safety-related plans and procedures, including occupational health and safety plan, emergency preparedness and response plan, risk assessment report	Emergency preparedness and response plan			
	Appropriate and sufficient occupational safety expert services or consultancy services to ensure that the prepared plans are implemented as defined in the relevant fields	OSH employment			
	All instructions on electricity, fire, working at height and heavy lifting, hazardous material safety defined in health and safety documents	OHS instructions			
	Hazardous Substance Management	MSDSs Chemical Safety Data Sheets Tanker Unloading Instruction Dangerous Substance Incoming Vehicle Control Instruction			
	Giving the necessary professional competence training to the employees,	Education records			
	Measures taken against epidemics	Field observations and inspections			
	Measures to be taken within the scope of traffic management	Records regarding the grievance mechanism			
Flora and Fauna	The COMPANY has no effect on flora and fauna. Therefore, there is no need to take mitigation measures.	Not applicable	Not applicable		

Table 42: Monitoring Plan