

Ankara-Niğde Motorway Project

2019 – 2020



SUSTAINABILITY REPORT

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ABOUT THE REPORT

ERG Otoyol Yatırım ve İşletme A.Ş. (ERG Otoyol, the Project Company) cares deeply about all its stakeholders and carries out intricate analyses and management of all its material impacts within the scope of the Ankara-Niğde Motorway (ANM) Project (Project).

This Sustainability Report, first of its kind for the Project, aims to transparently communicate the Project's governance approach and environmental, social and economic performance throughout the "Reporting Period", which covers the Project activities performed between 1 January – 31 December 2019 and 1 January – 31 December 2020.

The Global Reporting Initiative (GRI) Standards and the United Nations (UN) Sustainable Development Goals (SDGs) have been used as guidance in the preparation of this report. Both have helped define and report on the material issues that shaped this report.

This Sustainability Report has been prepared by ERG Otoyol. The report has not been subject to external assurance.

All comments, questions and feedback about this report can be addressed to ergotoyol@ergotoyol.com.tr

MESSAGE FROM THE CEO

Dear Business Partners, Stakeholders and Colleagues,

Covid-19 Infection, which affects the whole world, entered our lives in 2020 creating radical changes in all areas from health to economy and leaving even science without solution in treatment. Showing its most serious and negative consequences in the economic field, Covid-19 Infection has caused the deepest shrinkage in the world economy since the Great Depression of 1929. The fact that the bottleneck experienced in the economy caused a decrease in the economic welfare of individuals on the one hand, and the existence of administrative restriction decisions such as curfews and travel restrictions caused the epidemic to have serious effects on social life and psychological fatigue in individuals on the other hand.

Successfully completed through international alliances, including the World Health Organisation (WHO), to accelerate vaccine development and prepare for distribution, facilitating cooperation, accelerated research and international communication on an unprecedented scale in history, has been a somewhat promising development in breaking the mood of pessimism around the world. These developments resulted in a rapid recovery in the global economy during the second half of 2020. Since the vaccination activities gained acceleration in our country in 2021, the national economy has not gained the desired momentum in eliminating the effects of the pandemic compared to the global economy.

Although the project flow is directly affected by the pandemic due to the disruptions in the supply of manpower and materials, we managed to minimize the effects of the current adverse conditions and achieve fastest adaptation to the process as a result of the decisions we made by closely following the economic and social developments in the world. Despite the negative effects of the pandemic, which extend to every aspect of our lives from economy to social life, we completed the Ankara-Niğde Motorway Project, which we undertook to construct and operate in our capacity as the

Assigned Company, much earlier than we should, and put it into service. This is an indicator that our Company manages financial risks with a disciplined and dynamic understanding during the pandemic process and it is the successful result of our investments in human resources, sustainability, technology, innovation and digitalization.

People first, labor first, fidelity first!

While completing our project, we gave our all to work with maximum performance without compromising our environmental, social and corporate governance principles since we attach great importance to sustainability. In this context, with the awareness that each of our valuable employees involved in the completion of the motorway is our most valuable asset, we gave our principle of **people first, labor first, fidelity first** priority in every kind of action plans we have.

While establishing the administrative, technical and management staff of the project, we attached importance to female employment and adopted positive discrimination principles in order for the female power to prevail in the male-dominated construction sector. In order to create economic prosperity and employment for the people in the cities and rural areas where the motorway passes, we chose our field employees giving priority to the disadvantaged people who lost their jobs during the pandemic period. Thanks to our workforce with more than 50% from rural areas, we have contributed to development in local units that are in a negative position due to their income level and geographical location.

We have provided all our employees with all kinds of material and moral facilities and support in order to create safe working environments, especially pandemic protective equipment and materials. Given the large number of personnel employed, it is considered as a proud development that the number of occupational accidents involving our employees either individually or within third party subcontractors has not even reached two-digit figures.

In order to review the motorway construction and operation examples in the world and make improvements in this direction in our country, we aimed to contribute to the development of many of our personnel by creating opportunities such as site visits, training, etc.

The environment is everything!

In order to leave a more livable world for future generations with the motto ***environment is everything***, every plant species on the site within the scope of motorway construction works was evaluated by our expert employees and clients and many alternative studies and investments were made to protect their lives. For this purpose, the species, which are considered as endemic plants due to the ecological characteristics of their habitat, were moved to the areas where they can maintain their life formations with great care, contributing to biological diversity. Furthermore, forestation and landscaping studies were carried out in the locations where there is no vegetation on the motorway route, going toward the nature. We studied to protect water resources with applications that reduce water consumption in the construction sites and reuse wastewater in the processes, aiming to reduce the negative impact of the natural receiving environment on biodiversity value. For waste management in both construction site and administrative buildings, reduction of the amount of waste and separation of the generated wastes at the source have contributed to the circular economy.

This time advantage of the Motorway, which reduces the distance to be traveled by half, has greatly reduced fuel use and consequently carbon emissions.

Our highway, which facilitated access to many tourism centers such as Goreme National Park, which was included in the World Heritage List in 1985, Karlik Church, and St. Theodore Church, brought together historical texture and technology through historical living spaces. Our company, which carried out archaeological saving works under the control and supervision of the relevant museum directorates with the support of the archaeologists we

employ within the scope of the project in order not to damage the historical finds on the site during the construction works and to protect the cultural heritage, has identified approximately 400 historical artifacts and delivered the artifacts to the authorized public institutions.

We are proud to have achieved our goal of being the smartest road in our country within the scope of our innovation studies in 2020 by focusing on R&D, innovation and digitalization, providing the trio of best road, best service and best technology.

Appreciate, be appreciated!

On the one hand, in the areas where our Project is located, we have contributed to social awareness by building social and cultural areas by working in coordination with local supervisors, and on the other hand, we improved the conditions in the transportation roads connecting the provinces and increase the living comfort of the residents in the countryside by making repairs.

ERG Group of Companies will continue to serve as Companies that have been promising for our country for 55 years, as our youth, and advancing human life with superior technology and quality service.

Our entrepreneurship and innovation that combine our domestic employment and production power with international finance, we will move towards the goal of becoming a global leader group that combines the world of construction, investment and undertaking world of the future with technology.

I would like to express my gratitude to all our employees, business partners and service buyers who have contributed to us with their labor, dedication and fidelity for these feelings and purposes.

Tijen SIPAHI

CEO

ERG OTOYOL – THE PROJECT COMPANY

ERG Otoyol is the Special Purpose Vehicle (SPV) established for the construction and implementation of the Ankara-Niğde Motorway (ANM) Project through the Build-Operate-Transfer (BOT) model for a concession period of 11 years 10 months 17 days (construction and operation duration). The Company has been appointed by the Project Owner – the General Directorate of Highways (KGM) through a tendering process concluded in April 2017.

Within the SPV, ERG Construction acts as the pilot shareholder holding %80 share-of the shares.

Established in 1966, ERG Construction is one of the leading construction companies in Turkey and has completed the design, planning, construction, and implementation of a variety of major industrial and infrastructural projects including airports, dams, hydroelectric power plants and thermal power plants. Amongst the projects completed to date are Atatürk Airport, Antalya Airport, 670 MW Deriner Dam and Hydroelectric Power Plant and 4x344 + 2x344 MW Afşin-Elbistan Thermal Power Plant.

ERG Otoyol, headquartered in Ankara, is a member of the Ankara Chamber of Commerce (ATO).



ERG Otoyol manages all the Project activities within the framework of an Integrated Management System comprising:

- ISO 9001:2015 Quality Management System,
- ISO 14001:2015 Environmental Management System
- ISO 45001:2018 Occupational Health and Safety Management System, and,
- ISO 27001:2013 Information Technology – Security Techniques – Information Security Management System

6 March 2015

30 April 2017

18 August 2017

12 October 2017

7 June 2018

4 September 2020

16 December 2020

KGM decided to implement the ANM Project through a BOT model

KGM declared ERG as the winning bidder and appointed company for the Project.

The BOT Contract for the was signed between KGM and ERG.

Prime Minister Circular issued for the Project.

The Project reached Financial Close

Opening of Section 1 (119 km) and Section 3 (59 km)

Opening of Section 2 (113 km)

ANKARA-NİĞDE MOTORWAY (ANM) PROJECT

The ANM Project is one of the complementary sections of the United Nations Economic Commission for Europe (UNECE) Trans-European Motorway (TEM) Project, which is a regional transportation infrastructure Project established in 1977 with the initial financial support of the United Nations Development Program (UNDP). TEM Project starts from Poland and reaches Asia via Turkey and also covers Middle East and Southeast European countries. Turkey is one of the full members of the Project together with other 14 member countries (www.unece.org); www.uab.gov.tr.



- Motorways in operation
- Motorways under construction through the BOT model
- Motorways put in operation through the BOT model

With planning studies dating back to 1990's, the ANM has been one of the core sections of the TEM constituting the missing section of the southern Turkey TEM network until 2020. Crossing the provinces of Ankara, Aksaray, Konya, Kirsehir, Nevsehir and Niğde in Central Anatolia, the Project provides uninterrupted transport connection between the Europe and the Middle East via Turkey as the bridging country with its commissioning in 2020.

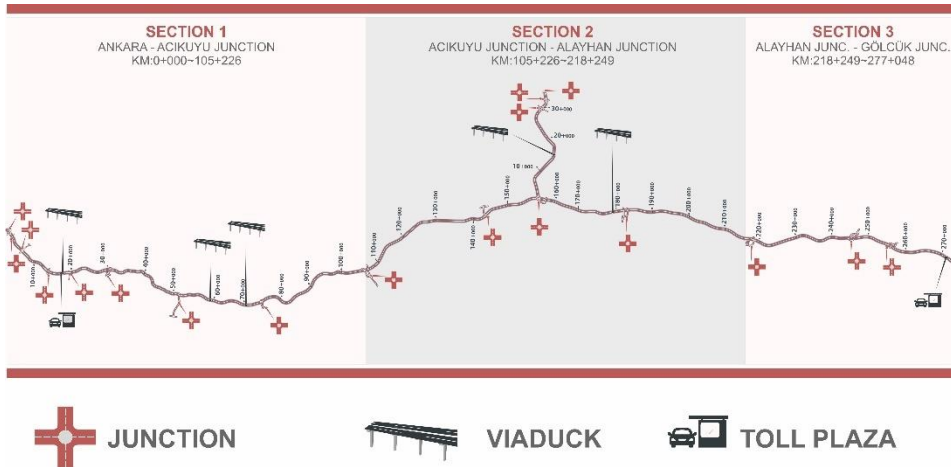
The main components of the Project consist of the motorway, engineering structures including the interchanges, viaducts, underpasses, overpasses, bridges, and culverts, as well as the operational facilities including the services areas, park areas and maintenance centers.

Ankara – Niğde Motorway – Key Project Features as of Financial Closure

Length (Basis for Traffic Guarantee as of 7 June 2018)	Total Motorway 332.04 km (277 km Motorway + 55 km Connection roads)	
	2x4 lanes (Ankara Ring Road Intersection-Ahiboz Intersection, 30 km) 2x3 lanes (Ahiboz Intersection-Gölcük Intersection, 245 km)	
Superstructure	Hot Bituminous Mixture	
Date of the Tender	14 April 2017	
Duration of the Concession Period+ %20	13 years 7 months 25 days (construction and operation duration + 649 days)	
Date of the Contract	18 August 2017	
Contract Sum+ %20	4.837.266.637,38TL 1.244.152.941,71 EUR	
Construction Period	3 years	
Financial Closure	7 June 2018	
Commissioning Date	4 September 2020 (Section 1 and Section 3) 16 December 2020 (Section 2)	
Total Number of Employees	2019	9,142 in August 2019 (peak)
	2020	7,366 in Month July (peak)
Employee Turnover Rate of the Project	140,000	
Total Number of Different Subcontractors worked in the Project (in 2019 and 2020)	2019	<ul style="list-style-type: none"> • One main construction contractor (ERG Construction), • 4 main construction subcontractors, • 178 subcontractors (maximum number of subcontractors present in the Project during the peak period),
		Cumulative number of subcontractors during the peak period, 302

2020

- One main construction contractor (ERG Construction),
- 4 main construction subcontractors,
- 156 subcontractors (maximum number of subcontractors present in the Project during the peak period)
Cumulative number of subcontractors during the peak period, 383
- 2 main operation contractors



Being amongst the key Projects in Turkey's Vision 2023, it reduces the travel distance between Ankara and Niğde by approximately 40 km and contributes to the economic growth, tourism, trading, and logistics capacity of Turkey, whilst ensuring access controlled, safe and comfortable transportation between the northern and southeastern provinces.

Besides its mission to reinforce the economic and social relations between the northwest and southeast Turkey, the Project is also anticipated to increase the accessibility of the important touristic areas in the region, including the Salt Lake and the historical Cappadocia.

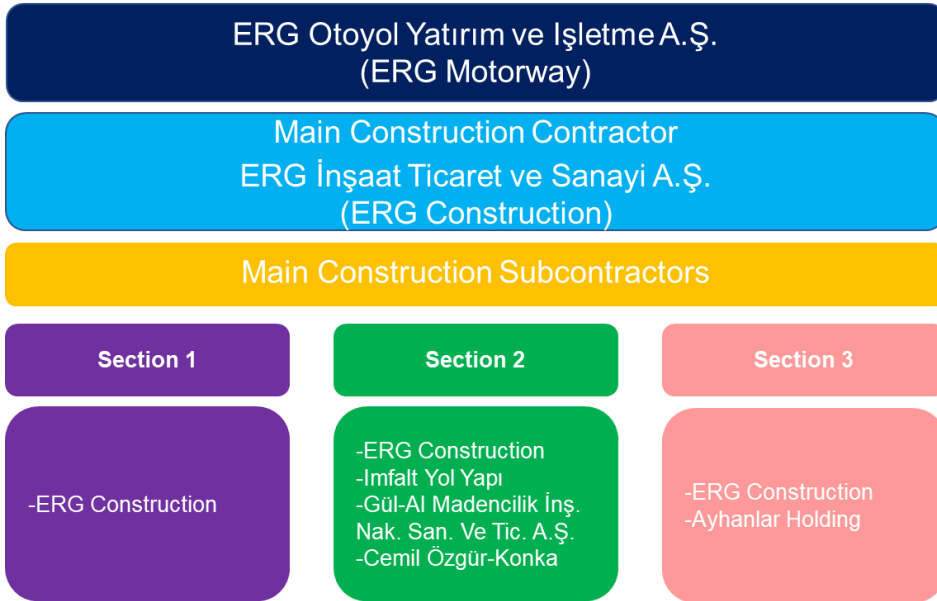
The Motorway will cross the provinces of Ankara, Aksaray, Konya, Kırşehir, Nevşehir and Niğde.

The Project consists of three sections:

Section	Description	KM Chainage		Total Route (km)
		Start	End	
Section 1	Ankara Golbasi-Acikuyu Intersection	0+000	105+478	119.63
Section 2	Acikuyu-Alayhan Intersection	105+478	218+224	153.30
Section 3	Alayhan-Golcuk Intersection	218+224	277+048	59.11
Total				332.04



In each section, various construction subcontractors were involved with the ANM Project as summarized below.



The Project was granted the Environmental Impact Assessment (EIA) Positive Decision in 2016 by the Ministry of Environment and Urbanization as per the Turkish EIA Regulation.

The Project has been implemented through credit facilities amounting to EUR 1.1 billion financed by Credit Suisse AG and guaranteed by the Danish Export Credit Agency (EKF) and the Swiss Export Risk Insurance (SERV), whilst local financing is provided by the Turkish banks including Türkiye İş Bankası A.S., Türkiye Vakıflar Bankası A.S., Yapı ve Kredi Bankası A.S. and Kuwait Turkish Participation Bank Inc. (altogether the Lenders).

After being assigned as a Category A Project as per the environmental and social (E&S) categorization criteria of the international standards adopted by the Lenders of the Project, an Environmental and Social Impact Assessment (ESIA) Disclosure Package was prepared in line with Equator Principles III (June 2013), IFC Performance Standards (January 2012), Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and

Social (E&S) Due Diligence (“OECD Common Approaches”, 2016) and relevant World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines.

The ESIA Disclosure Package, disclosed at the websites of ERG Otoyol, SERV and EKF comprises the following:

- Environmental and Social Impact Assessment (ESIA) Report
- Environmental and Social Action Plan (ESAP)
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)

In addition to the ESIA Disclosure Package, a Livelihood Restoration Plan (LRP) and a Resettlement Action Plan (RAP) were also developed for the Project as part of the ESIA studies.

An Independent Environmental and Social (E&S) Consultant has been commissioned by the Lenders for the execution of post Financial Close E&S Monitoring and Reporting works for the Project in line with IFC Performance Standards (PS), Equator Principles III and OECD Common Approaches.

The Post Financial Close E&S Monitoring studies started in September 2018 and monitoring site visits were conducted quarterly during the construction period in 2019 and 2020.

With the outbreak of the COVID-19 pandemic in Turkey in March 2020, ERG Otoyol has taken necessary measures within the Project’s organizational structure to mitigate the effects of the pandemic on both the Project workforce and local communities located close to the Project and ensure timely delivery of the Project in line with the committed schedule. As the Company has been collaborating with the highly experienced and competent subcontractors contracted under the ERG Construction, the construction of the Motorway and its components have been completed in December 2020 – in advance of the timeframe specified in the BOT Contract even under the complications and limitations brought by the COVID-19 pandemic. In 2020, with the commissioning of the Motorway, ERG Otoyol has started to work with two operation phase contractors, one of them being responsible for the operation and maintenance (O&M) of the Motorway, and one of them responsible from the operation of the service areas.



15 Intersections

5 Viaducts

14 Toll Stations

6 Service Areas
4 Parking Areas

50 Bridges
74 Overpasses
122 Underpasses
688 Culverts

142610 m Bored Pile
1,450,000 m Guardrail
749 km Fence



CORPORATE GOVERNANCE

As ERG Otoyol, we operate in line with corporate values and business principles with a focus on transparency, fairness, responsibility, and accountability and attach utmost importance to effective communication with all our stakeholders.

VISION AND MISSION

As ERG Otoyol, our vision is to continue to provide added value to Turkey's economy and its stakeholders whilst maintaining high level of customer satisfaction through the business discipline and management approach integrated in our Project.

As ERG Otoyol, our mission is to meet the expectations of the customers, employees, and stakeholders at the highest level by synchronizing engineering technologies and management sciences in the motorway sector in a way that will create value with quality, health, safety and environmentally sensitive corporate values depending on the individual, collective respect, law, economic and moral principles.

GOVERNANCE STRUCTURE

Robust corporate governance in compliance with regulations is the starting point and main pillar of a fair and successful establishment. ERG Otoyol has put these principles at the heart of its governance structure through a qualified three-tiered leadership system: Board of Directors, CEO, and the Department Managers.

The Board of Directors sits atop the ANM Project's organizational structure acting as an advisory board to the CEO, guiding the Company on its purpose, strategies, and policies on economic, environmental, and social topics. The Board of Directors is the highest governance body in ERG Otoyol working directly with the CEO, the executing arm of the Company operations with support from external consultants, lawyers, etc. as required.



Organization Chart of ERG Otoyol (SPV)

One of the three members of the Board of Directors and the CEO of the Project Company is female, thus making the 50% of the top management of the Project.

- The CEO and the Board of Directors are periodically informed about the Project and its operations through quarterly monitoring reports. Any critical issue/concern arising in the Project is separately communicated to the CEO and the Board of Directors, while being documented in the periodic reports. These issues are also addressed in the meetings between the CEO and the Board of Directors.
- Board of Directors' members are with proven experience on similar projects that has complementary economic, environmental, and social topics to be managed.
- The Board of Directors is also a part of the meetings held with the consultants and is leading the training organizations for the senior executives regarding the Project's economic, environmental and social performance.
- Both the members of the Board of Directors and the CEO go through regular briefings that develop and enhance their collective knowledge including the key aspects around environment, social and governance. Economic, environmental and social performance of the Project are annually reviewed by the Board of Directors.

Besides the Board of Directors, the Board of Discipline also supports decision-making and execution within ERG Otoyol. The Board of Discipline consists of 6 people including worker's representatives.

The HSE Coordinator is the main responsible for the management of environmental, health and safety, and social performance of the Project, with support from E&S and H&S teams/professionals undertaking the daily operations to meet the E&S standards stipulated by national legislation and international standards applicable to the Project.

ETHICS AND INTEGRITY

The key principles of ethics and integrity is embedded within ERG Otoyol's Code of Conduct (Compliance). To this end, we, as ERG Otoyol, stand for a comprehensive commitment to compliance and avoidance of unlawful conduct. Observing all laws and regulations, particularly anti-corruption legislation, and applying the Code of Conduct (Compliance) along with the Zero Tolerance Policy against business operations involving corruption and bribery are the top priorities of the Company.



The principles and frontiers adopted by the Company with respect to the payments, donations, sponsoring, invitations, and giving benefits and gifts within the scope of the Project, documentation requirements for specific conducts, and the aspects that require consultation with the HSE Coordinator are clearly set out within the Code of Conduct.

ERG Otoyol considers adherence to the Code of Conduct as a prerequisite in all Project processes and relationships and regards it as one of the cornerstones of its corporate culture. This leads the Company to strive for creating a working environment that supports cooperation, includes mutual respect and offers equal opportunities without discrimination at each stage of the Project.

The entire management staff and the executives of ERG Otoyol being the key pioneers, the Code of Conduct applies to all members of staff well as to any person who takes action or provides or receives services on behalf of the Company (e.g. agents, general agents, deputies, subagents, negotiators, brokers, consultants, etc.).

ERG Otoyol transparently and effectively communicates the Code of Conduct to all employees through the induction trainings delivered to all new employees and by posting it in all Project locations and work areas. No unethical action, legal non-compliance or corruption case has been reported in the Project throughout the Reporting Period.

In support of the Code of Conduct, a Project-specific Human Resources (HR) Policy has been developed by ERG Otoyol compliant with the international standards. The Project-specific HR Policy describes the Company's approach to ethics by covering, inter alia, compliance with relevant national and international legislations, non-discrimination, equal opportunity and grievance management aspects, and emphasizes Company's strong commitment for avoiding child labour and force labour in all activities undertaken within the scope of the Project.

There had been no lawsuits related to breach of national legislation in Project-related activities in 2019-2020. No violation of ethical values and integrity principles of the Company has been reported.

RISK MANAGEMENT

Risk management minimizes the possibility of a Company deviating from its objectives by encountering early and enables the Company to turn them into opportunities to achieve the targeted results. ERG Otoyol identifies and manages technical, financial, as well as ESG and health and safety (H&S) risks through systems established in line with international standards.



Identification and management of technical and financial Project risks are under the responsibility of related technical and finance departments led by directors/managers. The HSE Coordinator is responsible from the management of Project's E&S risks and reports the key findings of the risk identification and management processes directly to the CEO. As the main decision maker, the CEO, with technical input and support from responsible directors and managers, review all risk identification and management processes related to technical, financial, and E&S aspects.

Regarding the identification of E&S risks of the Project, a comprehensive Environmental and Social Impact Assessment (ESIA) process has been completed at the pre-construction phase of the Project. AECOM has been retained as the E&S Consultant to carry out the ESIA study for the Project in line with the E&S Standards comprising the following:

- Equator Principles III (June 2013)
- IFC Performance Standards on Social and Environmental Sustainability (January 2012)
- WBG General and Industry-specific Environmental, Health and Safety (EHS) General Guidelines (2007)
- OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (2016).

Through the assessments conducted by qualified E&S professionals of AECOM and reviewed by the independent E&S consultants on behalf of the Project's lenders, the ESIA process has enabled the Company to predict and assess the Project's potential adverse, beneficial, direct, indirect, residual and cumulative impacts and risks throughout the construction and operations periods, by using a systematic approach utilizing quantitative and qualitative methods to the extent possible for all primary and associated facilities included in the Project design.

Founded on the mitigation hierarchy, the avoidance, mitigation, and compensation/offset measures have been developed under the guidance of the ESIA process and embedded within the Project E&S Management System (ESMS) and the ESMMP that set out the framework of the subject-specific E&S management plans and procedures developed and implemented by the Company, with support from competent consultants as required, throughout the construction phase.

To help assess, control and continually improve the overall environmental and social performance of the Project, the ESMS, developed as part of the ESIA, is structured to include the following subjects in a comprehensive but compact and integrated manner:

- Policies

- Management Programs
- Organizational Capacity and Competency
- Emergency Preparedness and Response
- Stakeholder Engagement
- External Communications and Grievance Mechanism
- Ongoing Reporting to Affected Communities
- Monitoring and Review

The ESIA Disclosure Package compiling the E&S impact assessment documentation was finalized in 2018 and disclosed to the public on April 30, 2018 prior to closure of the Project's financing process. The ESIA Disclosure Package and supporting E&S documentation remain open to public review for the Project life through the following link maintained by the Company:

<http://www.ergotoyol.com.tr/cevre-ve-sosyal-etki-yonetimi/>

The E&S policies, management plans and procedures developed as part of the Project ESMS and risk management process are published and communicated to the Project personnel, Lenders and other stakeholders with the approval of the CEO.

In the post Financial Close period, the ESMS of the Project has been invigorated and a robust internal E&S monitoring system has been established to ensure compliance of the Project activities with the E&S requirements. Commensurate with the Project's E&S risks and impacts, the Project Lenders have also required quarterly post Financial Close E&S Monitoring studies to be conducted by AECOM as an independent E&S consultancy company for monitoring the E&S performance of the Project and verification of compliance with the Project E&S Standards.

This process enables the Company and the Lenders to identify, assess and manage the E&S risks and impacts on an ongoing basis. Through the continuous engagement with the Project stakeholders, including local communities and central and local authorities, stakeholder feedback is also integrated to the ongoing risk management process of the Project.

Throughout the construction period between 2018-2020, 9 independent monitoring studies were completed by the independent consultants reporting to Project Lenders. With the transition of the Project to the operational phase, E&S monitoring studies by the independent E&S consultants continue on a bi-annually basis.

The periodical monitoring reports prepared by the independent consultants and reviewed by the Lenders are shared with both the Project team and the Board of Directors, which is the highest governance body of the ERG Otoyol, to inform the risk identification and management process within the Project and warrant implementation of effective preventive/corrective actions with the ultimate aim of avoiding risks.

For robust identification and management of H&S risks during the construction phase of this mega infrastructure project, a comprehensive H&S Process Review was undertaken by Marsh Risk Consulting in Turkey in May 2019. The study included desk-based review of the H&S system, over 100 interviews with the with representatives of Project Company, contractors, subcontractors, and ESSA), observations made during site visits to many sites across the three sections of the Project and reporting to compile technical and organizational recommendations of the H&S professional who conducted the H&S review study. Site implementation of the recommendations of Marsh has been audited in October 2019 internally by SSB Zurich – a company affiliated with the ERG.

In April 2019, an external Labour Audit was commissioned by RINA Consulting in Turkey to identify and provide recommendations for the management of labour related risks of the Project.

Implementation of the recommendations from external H&S Review and Labour Audit were monitored by AECOM periodically as part of their quarterly E&S monitoring efforts.

Last but not least, an Internal Audit Procedure has been established during the construction phase of the Project for the continuous implementation, monitoring, and improvement of the Project's Integrated Management Systems. Through this Procedure, ERG Otoyol itself and all the subcontractors involved in the Project are periodically being audited by the ERG Otoyol's Management Systems Department.

Regarding the management of financial risk, ERG Otoyol conducts external audits through international independent auditing companies that provide accounting, auditing, tax and management consultancy services, and internal audits through the audit directorate. In these audits, financial provisions that have arisen or that may arise for each company transaction that will pose a risk are set aside and reports are prepared. These reports are presented to the CEO and the Board of Directors. In return, lawyers are employed within ERG Otoyol for contract and dispute management that may pose financial risks, and support is also received from external lawyers who are experts in their fields. In addition, support is received from proxies for the management of the contracts to which ERG Otoyol is a party within the scope of the Project and the enforcement of the terms of the contracts.

The cash flows that the Project will generate throughout its entire life cycle, covering both the construction and operation periods, have been determined on the "Financial Model" developed by Ernst & Young, and the model has been reviewed and approved by both Appointed Company and the Lenders.

Annual debt service, operational expenses and the annual amount to be paid to the O&M (Operation & Maintenance) Company, which constitute the largest expense item of ERG Otoyol, have been adjusted in accordance with the level of traffic guarantees to be collected in April each year.

Technical requirements to which the Project is subject are also detailed in the technical contracts. Compliance with these requirements is controlled by an external Company - ARUP with periodic on-site inspections and reports prepared by ERG Otoyol. In terms of compliance with the Implementation Agreement and contracts for the operation period, a number of personnel has been employed by the O&M Company and an organizational structure has been established in line with the main topics, while the expertise of International Infrastructure Operations Consultant - Intertoll Europe is used in fundamental issues such as technical processes, organization and budgeting.

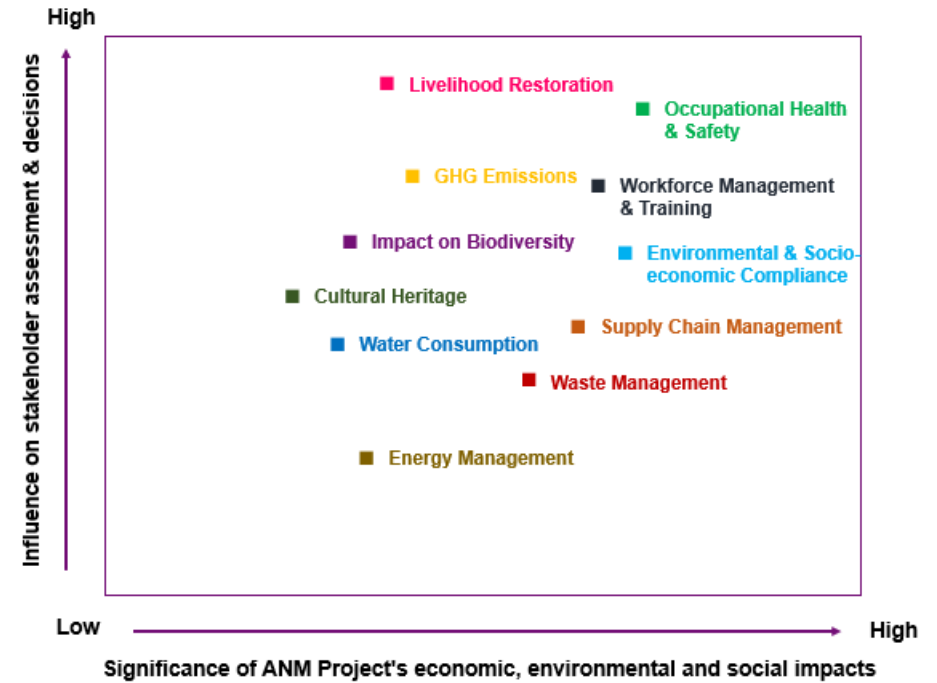
MATERIALITY ASSESSMENT

A significant step towards identifying material issues has been the review of the ESIA and SEP processes that started at the very early phases of the Project. Systematic and effective engagement with the stakeholders by a team of competent and dedicated community liaison officers (CLOs), led by the HSE Coordinator with strong support from the CEO, have continued throughout the construction phase. Through the ESIA and the extensive stakeholder engagement process, input of all stakeholder groups have been captured by ERG Otoyol.

Throughout the construction phase, ERG Otoyol has operated an effective external grievance and feedback mechanism compliant with the international standards that allowed collection and consideration of the feedback of all local communities located in the area of influence of the Project. Through the grievance and feedback boxes placed by ERG Otoyol at 81 settlements along the route, periodical meetings held by the CLOs and other Project representatives (i.e. site chiefs, H&S specialists, land acquisition experts, etc.) with the settlement heads, female and male representatives of the local communities as well as Project employees from the local along with the Project website allowing submission of grievance and feedback to the Project.

Besides the external stakeholders including the central and local authorities, local communities, academia, civil society organisations, national and local media, etc., through various channels including an internal grievance and feedback mechanism to monthly committee meetings and individual meetings, the engagement process has embraced the internal stakeholders of the Project that comprise a wide spectrum of Project personnel from senior level management staff to subcontractor managers and workers.

To this end, the framework of this Report addresses all material sustainability issues that have been identified based on the findings of the previous E&S assessment studies, periodical construction phase E&S monitoring works and the comprehensive engagement process carried out with internal and external stakeholders, as reflected in the following Materiality Matrix.



SUSTAINABILITY MANAGEMENT

The Ankara-Niğde Motorway Project intends to elevate Turkey's welfare and development as an exemplary infrastructure undertaking. While bringing nation-wide benefits for all stakeholders from government to the local communities and the users of the Motorway, ERG Otoyol is aware of the immense responsibility for the prioritization of thorough E&S management with the objective of maximizing the benefits of the investment and contribution to the sustainable development.

ERG Otoyol has focused on meeting and surpassing needs of all stakeholders, while making international best practices default within the Project. In ensuring a holistic sustainability management approach that are guided by ERG Otoyol's policies and certifications, the Company has built a robust E&S management system being implemented by competent E&S professionals under the Project's organizational structure.

Management Systems and Policies

As part of Project ESMS system, the following policies and certifications (linked to the Project website) safeguards compliance with applicable national legislation and international E&S standards:

➤ Policies:

- Environmental Policy
- Occupational Health and Safety (OHS) Policy
- Human Resources (HR) Policy
- Social Policy
- Corporate Social Responsibility (CSR) Policy

➤ Certifications

- ISO 9001:2015 Quality Management System (valid until January 1, 2022)

- ISO 14001:2015 Environmental Management System (valid until January 1, 2022)
- ISO 45001:2018 Occupational Health and Safety Management System (Valid until January 1, 2022)
- ISO 27001:2013 Information Security Management System (valid until October 27, 2023)

ERG Otoyol has in place an E&S Monitoring and Training Plan as part of the Project ESMS system to ensure continuous and effective implementation of the strategies and measures set out in the subject-specific E&S management plans.

Organizational Capacity

Competent E&S professional were employed in the Project throughout the construction phase to ensure effective implementation of the Project ESMS and its components with the objective of full compliance with the national legislative requirements and applicable international standards of the Lenders.

To this end, environmental engineers, archaeologists and CLOs were appointed in each Project section under the Contractor, reporting to the HSE Coordinator and Senior Social Specialist leading the E&S team from the Project headquarters in Ankara. The management and site teams ensured day-to-day implementation of the E&S measures by all Project personnel and monitoring of subcontractors' compliance with the Project Standards.

The in-house E&S capacity of ERG Otoyol has been supported by E&S services outsourced from external professionals:

- Academicians for the monitoring of the terrestrial and aquatic flora and fauna as part of biodiversity management
- DOKAY EIA-Environmental Engineering Ltd. Sti. for the development of E&S management plans and procedures
- Duru Engineering for fulfilling permitting requirements under the Turkish environmental legislation.

- ESSA for the management of H&S aspects of the Project in line with the national requirements and international OHS standards
- FEBAS Environmental Laboratory for environmental monitoring works including air (dust) and noise measurements and surface water quality sampling and analysis

With the start of operation phase in 2020, ERG Otoyol has started to adapt its organizational structure to the needs and priorities of the operation phase E&S management.

ECONOMIC PERFORMANCE

The Project has become partially operational in 2020. The economic performance of ERG Otoyol in 2020 is summarized below:

Economic Performance	2020
Economic Value Distributed	
Operating costs	5 431 124 Euro
Employee wages and benefits	691 558 Euro
Economic Value Retained	525 739 992 Euro
Tangible assets other than cash and cash equivalents	
Trade receivables	25 394 782 Euro
Other receivables	16 520 Euro
Receivables from Service Concession Arrangements	1 590 359 569 Euro
Property, Plant Equipment	277 193 Euro
Corporate income tax accrued	-25 811 514 Euro

During the construction phase of the Project, the delivery of goods and services by third parties have been exempted from Value Added Tax (VAT).

All personnel working in the Project have been paid above the minimum wage with equal opportunities provided for the similar positions filled by the female and male employees.

According to the Labour Law of Turkey (Law No: 4857) and union agreements, lump sum payments are made to employees retiring or involuntarily leaving ERG Otoyol. Under these obligations, ERG Otoyol has provided 147 221 Euros to its employees from the beginning of the Project.

Tax Governance

ERG Otoyol operates with the awareness that the taxes paid are supporting the sector they are operating and serve public benefits. ERG Otoyol always strives to establish open, honest and strong relationships with all its stakeholders including the tax authority, shareholders, customers, analysis professionals, the media and public organizations and conforms to both the context and the essence of national legislation by ensuring the compliance of the management and control of operations in every jurisdiction with all tax liabilities.

ERG Otoyol has a robust risk management framework encompassing also tax management. Since ERG Otoyol is not a publicly traded company, tax strategy is not publicly disclosed. The tax strategy of ERG Otoyol is being prepared by the Audit Directorate for a duration of 3 years and then approved by the Chairman of the Board of Directors.

Tax management and control within ERG Otoyol is directed for spotting any erroneous and/or fraudulent transactions, determination of the essential data to make financial analysis for a more efficient performance and guiding the way and assisting the responsible employees to take the necessary measures.

ERG Otoyol's Audit Director is responsible for compliance of the Company's tax strategy and all accounting and financial records are realized with the approval and control of this position.

ERG Otoyol's compliance with the tax governance and control framework is regularly audited by the sworn-in chartered accountants and an attestation report is issued. The attestation reports are then presented to the Tax Authority. Also, tax controls are carried out by ERG Otoyol's external independent auditors throughout the periodical audit processes.

ENVIRONMENTAL SUSTAINABILITY

In line with the Project E&S Management System established compliant with international standards and the Environmental Management System of the Project certified to ISO 14001: 2015, ERG Otoyol has adopted the utmost sensitivity to the environment and nature as a precondition with its entire staff while performing all its activities.

Through its Environment Policy published on Project website, ERG Otoyol recognizes that the very nature of its business is intrusive on the environment and therefore commits to mitigating adverse impacts by operating in accordance with international best practice. The Company is committed to provide adequate resources to manage its environmental obligations during the construction and throughout operation phases. This includes an adaptive management process to benefit from continuous environmental monitoring as well as the application of a mitigation hierarchy which emphasizes elimination of environmental pollution at source.

To this end, the Company has designed and managed its activities to comply with all applicable national environmental legislation and adhere to the requirements of the applicable international standards as set out by the WBG General and Industry-specific EHS Guidelines. In line with its strong commitment to environmental sustainability and management, ERG Otoyol requires its consultants, contractors, subcontractors, suppliers, and subsidiaries to adopt the principles of its Environmental Policy adopted in the Project.

The Company has warranted its commitment to environmental sustainability through the capacity provided by the competent environmental professionals employed in the Project. The environmental trainings delivered to entire Project personnel has been key to conceptualizing the importance of compliance with national and international environmental standards through efficient use of energy, raw materials and natural resources, avoidance/minimization of waste generation with an understanding of the importance of circular economy and prevention of pollution as an inherent objective of the Project activities.

Responsibility for conformance and execution of the Project Environmental Policy has been taken on at the top level by the CEO of the Company.

GREENHOUSE GAS (GHG) EMISSIONS MANAGEMENT

Potential impacts of the Project due to air emissions on human and ecological receptors were assessed as part of the ESIA process for the construction and operation phases. Moreover, GHG emissions anticipated to be emitted during the construction and operation phases of the Project were calculated in line with internationally accepted approaches and calculation methods.

During the construction phase of the Project, Scope 1 GHG emissions were emitted from the following activities:

- Combustion of diesel fuel in construction vehicles, equipment, and plants for construction
- Heating of camp sites with Liquefied Natural Gas (LNG)
- Blasting in quarries
- Change in land use type (clearing vegetation)
- SF6 emissions

The source of the Scope 2 GHG emissions during the construction phase the electricity usage of the Project.

Total GHG Emissions (Scope 1 + Scope 2 tCO ₂ eq.)	2018-2019	2020	Total
Scope 1			
Combustion of diesel fuel in construction vehicles, equipment and plants	320,034.40	108,765.15	428,799.15
Blasting in quarries	10,921.77	3,655.93	14,577.70
Change in land use type (clearing vegetation)	1,412,815.39	125,585.67	1,538,401.06
Scope 2			
Electricity	22,929.78	14,142.79	37,072.57
Total	1,766,701.34	252,149.54	2,018,850.88

*CO₂, CH₄ and N₂O were included in the calculations depending on the type of activity.

With the majority of the clearing of vegetation activities being completed within the first year of the Project, GHG emissions decreased by 85.7% in 2020 compared to 2018-2019 period.

GHG Emissions Intensity Ratio	2019	2020
GHG Emissions Intensity Ratio (tCO ₂ eq/Million TL) *	-	3,801.98
GHG Emissions Intensity Ratio (tCO ₂ eq/km)	5,321.39	759.49

* Total GHG emissions of the Project/revenue

For the operation phase of the Project, as per Equator Principles III, if the combined Scope 1 and Scope 2 emissions of the operation phase of the Project exceed 100,000 tons per year, GHG emissions will be publicly reported on the ERG website.

AMBIENT AIR QUALITY MANAGEMENT

The Company has established a comprehensive ambient air quality baseline through measurement of a number of relevant parameters including dust (PM_{2.5} and PM₁₀), settled dust, NO_x, SO_x, and benzene at settlements located along the Project route. This has allowed evaluation of the Project impact on ambient air quality benchmarked with the pre-impact conditions and planning and implementation of mitigation/corrective measures whenever needed during the construction phase. The ambient air quality measurements continue throughout both the construction and operation period at 23 settlements selected during the baseline studies.

Earthworks and material extraction activities at the quarries and material borrow sites along with the exhaust emissions from the construction machinery were the main particulate matter emission sources of the Project during the construction works.

Through the monitoring program, ERG Otoyol has evaluated the impact of construction activities on the ambient air quality on a quarterly basis. With the effective implementation of the external grievance mechanism and engagement with the local communities, the Company could be able to identify temporary increases in the dust levels and take immediate actions to mitigate adverse impacts on the receptors.

During the operation phase, Motorway traffic will result in air emissions in the form of exhaust gases that would gradually increase in time due to the potential increase in the volume of traffic on the Motorway. The ambient air quality monitoring program will continue quarterly for the first year of the Motorway operation and continue bi-annually for the remaining duration for NO₂, SO₂, benzene and VOC parameters.

ENERGY MANAGEMENT

A large portion of total energy consumption of the construction activities comes from fuel oil – diesel use in machinery, while LNG and electricity make up the remainder. Through the environmental trainings provided to the Project personnel responsible from the operation of the construction machinery and equipment, the Company targeted minimization of energy consumption caused by the construction activities.

Embedded in the design of the operational facilities, use of the state-of-the-art infrastructure and technologies at the control centers, operation and maintenance facilities and service areas will help the Project minimizing its energy consumption throughout the Project life.

In 2019, a total of 169.85 TJ of energy was consumed, which decreased by 38.33% to 104.74 TJ in 2020. The Project consumed a total of 247.59 TJ of energy throughout the 2 years.

Total Energy Consumption of the Project		2019	2020
Total fuel consumption (J)	Fuel oil	4×10^{15}	1×10^{15}
	Natural gas	20×10^{12}	20×10^{12}
Total energy consumption (kWh)		47,180,618	20,100,389
Total energy consumption (TJ)		169.85	104.74

*Standards and conversion factors are noted at the bottom of this page.¹

¹ Conversion factors

For Diesel: 1 liter diesel = 10.7 kWh; 1kWh = 3,600,000 Joule

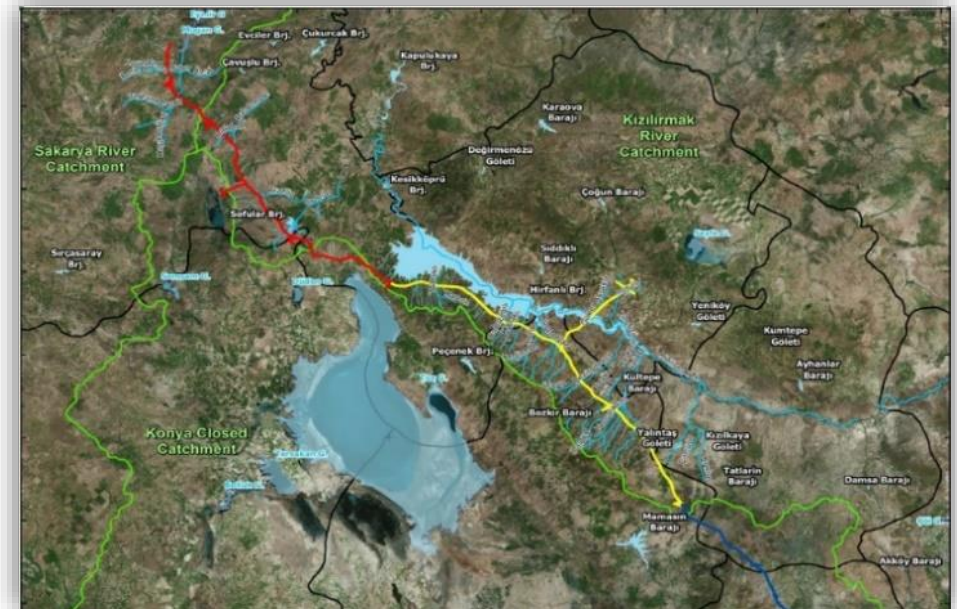
For LNG: 1 kg LNG = 1.3043 m³ natural gas; 1 m³ natural gas = 10,64 kWh; 1kWh = 3,600,000 Joule

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WATER MANAGEMENT

The Project crosses three river catchments (Sakarya, Kizilirmak and Konya) and surface water resources along its entire route. The engineering structures designed to uphold continuity of the flow of surface water resources has enabled the Project to minimize its impacts on surface water resources.

In line with the Project Environmental Policy, ERG Otoyol aimed to minimize the amount of fresh water required for construction of the Motorway and manage the wastewater generated at the construction camps and facility sites in a sound manner consistent with the strictest requirements of the national legislation and international standards.



Water Consumption

Project water consumption during the construction phase has been provided from municipal water network and groundwater resources for the suppression of dust due to the construction and material extraction activities, provision of materials (concrete, asphalt, plant mix, etc.) for road construction and the sanitary needs of the Project personnel. Groundwater utilization permits were secured from the relevant governmental authorities. Drinking water for the Project personnel was supplied as bottled water.

Amount of water supplied for the Project in 2019 was 276.01 megaliter, which decreased by %59.92 in 2020 with the progress of the construction works towards finalization.

Section	Water Consumption (Megaliter)	
	2019	2020
Oğulbey HQ	16.04	4.71
Section 1	144.20	62.84
Section 2	78.27	30.32
Section 3	37.49	12.74
Total	276.01	110.62

Water Conservation Measures

During the construction phase, ERG Otoyol strived for the efficient use of water resources and minimization of the freshwater requirements.

Being responsible for most of the daily water consumption, concrete plants were the focal point for water conservation measures of ERG Otoyol. Sedimentation tanks set up at each concrete plant used in the Project allowed the Company to settle the wastewater coming out of the washing operations and reuse the settled water in concrete production and washing operations, significantly reducing the Project-related freshwater consumption.

Wastewater Management

At the three main Project construction camp sites in Derekisla (Section 1), Kutuklu (Section 2), and Osmanli (Section 3), package wastewater treatment plants were established and operated throughout the construction phase in line with the requirements of the applicable legislation. With the progress of the construction works towards finalization, the treated wastewater discharge decreased from 220 megaliters in 2019 to approximately 90 megaliters in 2020.

Quality of the treated wastewater discharge from the package wastewater treatment plants to the nearest receiving environment was monitored by ERG Otoyol on a quarterly basis to ensure compliance with the related limit values specified in the Water Quality Control Regulation of Turkey and the WBG General EHS Guidelines. Additionally, external wastewater monitorings are conducted regularly by the related Provincial Directorates in accordance with the requirements of Environmental Permits obtained.

In other construction camp and facility sites of the Contractor and subcontractors, non-leaking septic tanks were utilized for the management of domestic wastewaters. Domestic wastewater collected in septic tanks were periodically removed by means of the vacuum trucks of the Project (transferring the domestic wastewater to the closest package domestic wastewater treatment plant of the Project) and discharged to the related municipalities.

Section	Treated Water Discharge (Megaliter)	
	2019	2020
Oğulbey HQ	12.84	3.77
Section 1	115.36	50.28
Section 2	62.62	25.25
Section 3	30.00	10.20
Total	220.81	89.49

Surface Water Quality Monitoring

The ESIA has characterized the baseline quality of the surface water resources crossed by and/or located in the vicinity of the Project route and facilities through the sampling and analysis campaign undertaken in February 2018 at 17 surface water quality stations.

ERG Otoyol has continued surface water quality monitoring on a quarterly basis throughout the construction phase. To this end, the quality of the surface water samples collected and analyzed by an accredited laboratory as part of 8 different quarterly campaigns were benchmarked against the water quality criteria of the Inland Surface Water Resources. Apart from the seasonal variations and the effect of the agricultural practices conducted in the region, the monitoring results did not suggest any significant Project impact on the quality of the surface water resources.

There had been no untreated wastewater discharge, spill or leakage from the Project causing significant adverse impacts on the quality of surface water resources during the construction phase.

MATERIALS AND WASTE MANAGEMENT

Materials and waste management play a crucial role on preserving resources. An integrated materials and waste management approach unlocks a circular economy perspective, where the entire lifecycles of materials are effectively managed, and recycling and reuse are maximized.

ERG Otoyol recognized and realized the potential of reuse in this Project. A higher material reuse rate not only contributes to the environment, but also to the business success.

Materials Management

An infrastructure Project of this scale requires use of materials at every stage; from earthworks to construction of engineering structures, pavement layer works, etc.

The number of material production facilities used during the construction phase of the Project in 2019-2020 period is given below.

Year	Crusher	Cold Plant Mix (PMT/PMAT)	Asphalt Plant	Polymer Modified Bitumen Plant (PMB)
2019	27	22	16	7
2020	11	14	12	4

The figure below highlights the central elements and materials of the five-layer road pavement over the selected material layer formed with the materials extracted from the quarries and borrow sites. A total of 1.63 million m³ and 2.44 million m³ of materials were used for this purpose in 2019 and 2020, respectively.



Excavated material having sufficient quality for fill operations was reused in the construction works. This ensured resource efficiency and minimized the amount of material to be extracted from material borrow sites while reducing associated costs.

Most of the excavation works of the Motorway (94.7%) were completed in 2019. In 2020, portions of the materials excavated were reused in the infrastructure works. In total, 75.3% of all excavation material was reused in 2019 and 2020.

Section	Total amount of excavation (Million m ³)		Total amount of excavation material reused (Million m ³)	
	2019	2020	2019	2020
Section 1	27.63	1.39	19.90	2.41
Section 2	18.05	1.49	14.22	0.32
Section 3	5.95	0.00	4.20	0.00
Total	51.62	2.88	38.32	2.73

Waste Management

The waste management strategy of the Project relies on the mitigation hierarchy with the objective of prioritizing avoidance, and where avoidance is not possible, minimization of the waste generation. In line with the Environmental Policy of the Project, waste management is planned and executed throughout the entire Project in line with the requirements of ISO 14001:2015 Environmental Management Systems.

Hazardous and non-hazardous wastes were generated at the construction camp, facility, and work sites of the Project. These wastes, including municipal and recyclable wastes along with the packaging material contaminated with hazardous substances, waste oil, tires, solvents, metals, vegetable oil, and medical wastes from the infirmaries, etc., were separately collected at their sources, temporarily stored on site at the dedicated waste storage areas built in accordance with the legislative requirements and good international practice, reused in the construction works whenever possible and sent to off-site licensed recycling, recovery, or disposal facilities whenever utilization on site is not possible.

Through the induction and refresher trainings, the techniques for waste avoidance, minimization and reuse were emphasized among all direct and contracted Project employees and sound management of wastes have been achieved.



For the waste generated in 2019 and 2020, official waste declarations were made by ERG Otoyol to the Ministry of Environment and Urbanization as per the requirements of the national legislation.

Waste Generation (tonnes)	2019	2020
Non-hazardous waste	1,810	978
Hazardous waste	161	99
Total waste generated	1,970	1,078

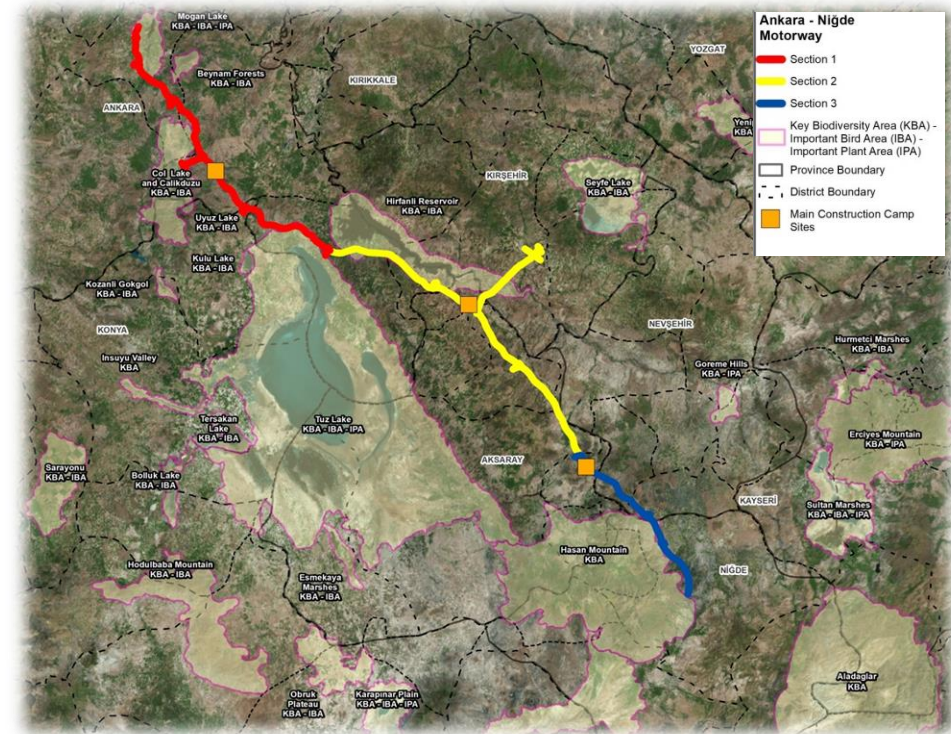
BIODIVERSITY

A rich and flourishing biodiversity generates ecological, recreational, cultural, and economic value for its surroundings. ERG Otoyol has established the biodiversity baseline through terrestrial and aquatic field surveys conducted by qualified experts. Building on a robust biodiversity baseline, the Biodiversity Action Plan (BAP) developed in line with the requirements of IFC PS6 and implemented with support from the leading academicians has ensured conservation of biodiversity components along the Project route.

Legally Protected and Internationally Recognized Areas along the Motorway Route

Golbasi Special Environmental Protection Area (SEPA) and Tuz Lake SEPA are the two legally protected areas located along the Motorway route (Golbasi SEPA is being crossed by the Motorway and Tuz Golu SEPA's boundary is located 200 m south of the Motorway). Management of these protected areas is under the responsibility of the Ministry of Environment and Urbanization, General Directorate of Protection for Natural Assets. As a commitment to fulfil the provisions of Barcelona Convention and its Protocol on Specially Protected Areas, SEPAs in Turkey are ecologically significant areas at the national and international scale. Both of these SEPAs have been assessed as "Category VI" (Protected area with sustainable use of natural resources) according to the IUCN Protected Area Management Categories.

There are also five internationally recognized areas that the Motorway passes through, namely; Mogan Lake Key Biodiversity Area (KBA) (also Important Bird Area – IBA and Important Plant Area – IPA), Hirfanli Reservoir KBA (also IBA), Tuz Lake KBA (also IBA), Hasan Mountain KBA, and Col Lake and Calikduzu KBA (also IBA). Official statements have been acquired from authorities regarding the statuses of these areas within the scope of the National EIA, which led to commitments for the Project specifically for the conservation of the integrity of these areas. No additional issues have been raised by the authorities, given impacts on biodiversity values present at these areas are managed effectively and related parties are consulted during the process in line with the requirements of national legislation.



Biodiversity Action Plan

Based on the biodiversity baseline data collected through field surveys of the academicians in May 2018, the Project BAP was finalized in September 2018.

Implementation of the BAP actions started in October 2018, with the translocation of species of conservation importance. As per the BAP, a bi-annual biodiversity monitoring is being conducted by the biodiversity experts since May 2019 with the objective of monitoring the status of biodiversity features and the extent of implementation of BAP actions. In 2019-2020 period, six (6) biodiversity monitoring studies were conducted by the academicians.

Critical Habitats

The Project crosses Gypsum Steppe Habitat at KM 97+200 and a Marsh Habitat, feeding Mogan Lake, at KM 17+000 through the Golovasi Viaduct. These habitats have been identified as critical habitats as per IFC PS6 and managed through the measures taken as part of BAP implementation.

Translocation of the Gypsum Steppe Habitat took place in October 2018 under the guidance of the expert botanist (academician). Species significant to the habitat were subsequently translocated to the off-set location. In July 2019, the offset area was further improved by bringing in new soil material with gypsum. Through the periodical monitoring studies and ongoing BAP implementation support provided by the expert botanist, the expert has identified in June 2020 that the habitat has been restored successfully at its new location. The success rate for transplanted species of *Gypsophila eriocalyx*, *Cousinia halysensis* and *Astragalus mesogitanus*, as well as the dominant species of the habitat including; *Thymus sipyleus* subsp. *rosulans*, *Festuca valesiaca*, *Artemisia austriaca* and *Teucrium polium* was assessed to be 80%. Vegetation work in the area has continued with follow-up actions to further enhance the overall habitat success rate.



Offset Location of the Gypsum Steppe Habitat (October 2018)

The Marsh Habitat crossed by the Golovasi Viaduct has been fragmented with a parallel service road on an embankment. Hydraulic continuity across the service road and beneath the viaduct has been maintained by the installation of three pipelines connecting the two portions of the wetland. The ecosystem is being periodically monitored by the biodiversity experts.



Marsh Habitat (Golovası KBA; KM 17+000)

Species of Conservation Importance

Two sensitive flora species were identified on the Project route:

- *Centaurea tchihatcheffii*: Local Endemic and categorized as Critically Endangered as per the IUCN National Red List
- *Astragalus simonii*: Regional Endemic and categorized as Endangered as per the IUCN National Red List

The local endemic *Centaurea tchihatcheffii* are distributed only in Golbasi district with a restricted range and two populations were determined along the Project route. The first is located at KM 28 near the west of Mahmatli and known as the best population in terms of viability. There are approximately 5,000 individuals in this population. The second is located near the Sofular Viaduct at KM 71+300 with almost 1,000 individuals. In order to increase the number of *Centaurea tchihatcheffii* individuals, seeds have been collected for their plantation. Replantation at the new site took place in November 2019.



Centaurea tchihatcheffii originally existing near Mahmatli (May 2019)

The regional endemic *Astragalus simonii* population located at KM 237 had very low population abundance at their observed habitat. As an ex-situ measure, seeds were collected from the area in June 2020 and August 2020 and sent to the Turkish Seed Gene Bank. As an in-situ conservation measure, plantation has been implemented to the side slopes of the motorway route at suitable habitats, especially those having volcanic soil. The plantation took place in May 2019 at KM 240+000. The success of the growth is being monitored by the expert botanist periodically.



Astragalus simonii plantation (KM 240+000; May 2020)

Partnership with Third Parties (Academics)

The BAP implementation and periodical monitoring works have been undertaken by:

- Prof. Dr. Hayri Duman (Gazi University): Flora expert, conducts the bi-annual field monitoring studies and coordinates the site conservation measures.
- Prof. Dr. Aydin Akbulut (Hacettepe University): Conducts the aquatic flora and fauna monitoring studies.
- Prof. Dr. Zafer Ayaş (Hacettepe University): Conducts the fauna and ornithology monitoring studies.

ENVIRONMENTAL COMPLIANCE

The Project E&S Management System (ESMS) is the safeguard of Project's environmental compliance. Through its Environmental Policy developed and implemented under the Project ESMS, ERG Otoyol is committed to designing and managing its activities to comply with all applicable local and national laws and regulations and adhere to the requirements of the applicable international standards.

The Company requires the same commitment from all contractors, subcontractors, suppliers, and contractors serving the Project by incorporating the Project E&S requirements to the contractor and subcontractor agreements.

Throughout the construction phase in 2019 and 2020, ERG Otoyol has managed all the Project activities within the framework of ISO 14001:2015 Environmental Management System. As part of the Integrated Management Systems, the Company is audited regularly by external auditors.

ERG Otoyol has required the main Construction Contractor to establish an Internal Audit Procedure, which was published on 24 February 2018. The objective of the Procedure has been to ensure planning and implementation of the internal audits in a systematic way, reporting of the key findings/non-compliances and planning and execution of corrective actions, as necessary. Internal Audit Plans were developed and implemented for 2019 and 2020 as part of the implementation of the Procedure. The non-compliances identified during the internal audit reports were kept and tracked through a 'Non-Compliances Follow-up Log', which has allowed the description of the non-compliance, Subcontractor Company, date of the non-compliance, close-up date, result/action and the status (open/closed). This internal audit system helped ERG Otoyol to monitor subcontractors' environmental compliance closely throughout the construction phase.

Environmental Impact Assessment under National Legislation

A full Environmental Impact Assessment (EIA) process was initiated by the General Directorate of Highways (Karayolları Genel Müdürlüğü – KGM) as the developer of the Project. Based on the EIA Report prepared, the EIA Positive Decision was secured from the Ministry of Environment and Urbanization on 5 September 2016

(Decision No: 4280). National EIA Report of 2016 covered both the Motorway and the quarries and borrow sites planned to be used during construction as per the design of the date.

There were Project facilities (e.g. quarries, crushing plants, concrete plants, asphalt plants, etc.) incorporated to the design as per the Project needs in the post EIA period. National permitting processes for these facilities were undertaken in line with the requirements of the applicable Turkish legislation under the supervision of a certified environmental consultancy company appointed within the scope of the Project. To fulfill the requirements as per the national EIA Regulation, an additional integrated EIA Report was prepared for 22 quarries and borrow sites, and the EIA Positive Decision was secured from the MoEU on 16 August 2019 (Decision No: 5617).

Throughout the construction phase of the Project, both the Motorway and facilities established in quarry and borrow sites used for material excavation were audited by Ministry of Environment and Urbanization. In 2019, 41 and in 2020, 12 external audits were conducted for the facilities, quarries and borrow sites used in the Project. No non-compliance was identified and/or reported by the authorities.

The status of permitting within the scope of the Project was also monitored by the Lenders as part of their periodical E&S monitoring works.

SOCIAL SUSTAINABILITY

Ensuring social sustainability has been the priority of ERG Otoyol in the Ankara-Niğde Motorway Project as the social acceptance of the investment by all Project stakeholders and maximized benefits provided to the nation, local communities as well as Project's direct and contracted workforce along with a heightened level of safety and welfare are the key success metrics considered by the Company inseparably with the environmental, financial, and technical metrics.

ERG Otoyol's approach to social sustainability as part of this investment has come into being within the Social Policy, Human Resources Policy, and Occupational Health and Safety Policy of the Project.

STAKEHOLDER ENGAGEMENT

Stakeholder engagement has been at the heart of the Project since the beginning. Engagement with the authorities and local communities that started by the government in the early phases of the Project geared up during the national EIA process.

As an indispensable component of its corporate culture and Project Social Policy, ERG Otoyol brought in a structured and systematic stakeholder engagement approach to the Project with the beginning of the ESIA process in 2018 in line with its commitment to the establishment of sustainable relationships with Project stakeholders, which has continued effectively throughout the entire construction phase in 2019-2020. This has included set up and operation of external and internal grievance and feedback mechanisms meeting the requirements of international standards and good practice.

Consistent with the internationally accepted definitions, the stakeholders of the Ankara-Niğde Motorway Project have been identified as the persons or groups who are directly or indirectly affected by the Project, as well as those who may have interests in and/or the ability to influence the outcomes of the Project.



Project Stakeholders

As part of the ESIA studies, socio-economic field surveys were conducted in February 2018, which comprised engagement with the Project affected communities, households, and local governmental institutional stakeholders (provincial and district governorates, municipalities, and mukhtars/headmen). A total of 446 individual stakeholders were engaged and consulted, of which 22 were governmental institution representatives, 34 were mukhtars/headmen, as well as 4 focus groups surveys and 375 household interviews.

A Stakeholder Engagement Plan (SEP), compliant with the requirements of IFC PS1, has been developed as part of the ESIA Disclosure Package. The SEP has been in place since 2018 and is periodically updated to integrate the context and outcomes of the on-going consultation activities. Three Community Liaison Officers (CLOs) were appointed for the entire construction phase to lead the engagement activities with the local communities. As needed, managers of related departments, technical site staff and the archaeologists have supported the CLOs to respond to the information needs and grievances of the stakeholders in a timely and effective manner.

In 2009, periodical meetings were held intensively with the local communities. ERG Otoyol has placed great emphasis on reaching out vulnerable persons, women and households affected from Project-related land acquisition within affected communities to understand their concerns and grievances and reflect them to Project implementation as appropriate.

The Senior Social Expert of the Company and one of the CLOs were female to steer the consultations particularly with the women stakeholders. The women engineers of the Company also supported the CLOs as part of consultations with the female members of the affected communities, whenever required.

To this end, separate women and livelihood restoration meetings were organized. In 2020, due to COVID-19 pandemic, consultations with the stakeholders were conducted remotely by telephone rather than face-to-face meetings. The concerns, feedback and grievances raised by the stakeholders during meetings were registered by the Project CLOs and responded in line with the Project SEP.

Number of Meetings Held in Project Affected Settlements

	2019	2020
Public consultation meetings	In 82 settlements 116 meetings, covered a total of 754 participants	Public meetings were not conducted due to COVID-19 pandemic
Women meetings	In 23 settlements 23 meetings, covered a total of 221 participants	In 10 settlements 10 meetings, covered a total of 56 participants
Meetings specific to Livelihood Restoration Plan	In 33 settlements 33 meetings, covered a total of 373 participants	



Communication Channels

In line with international standards and its own corporate policies, ERG Otoyol is committed to communicate openly about all Project-related activities with its stakeholders. Various communication channels were utilized to engage with the stakeholders as part of SEP implementation. Individual, public and focus group meetings were held with the stakeholders, digital information was published at the Project web site, printed materials were distributed to the affected communities and especially during the COVID-19 pandemic, remote engagement methods such as phone, e-mail and digital messages were used. The Project website is active since January 2018 (<http://www.ergotoyol.com.tr>).

The ESIA Disclosure Package (in Turkish and English), including the ESIA Report, SEP, NTS and ESAP, together with the LRP and RAP have been disclosed by ERG Otoyol to public through the Company website and will remain in the public domain until the end of BOT Contract. The hard copies of the Turkish copies of ESIA, NTS, SEP and LRP/RAP brochures were also distributed to affected communities in the first quarter of 2019.

Grievance boxes and comment forms have been put in 81 affected settlements. Project's stakeholders have been provided with the opportunity to use the Project's website or grievance boxes/forms placed at the settlements and the construction camp sites to convey their opinions, questions, comments, or complaints about the Project directly to ERG Otoyol.

The CLOs appointed in the Project have ensured direct and ongoing relation with Project's stakeholders so that they can convey their messages to ERG Otoyol in person. The CLOs visited each affected community periodically and the contact information of the CLOs have been widely available among the community members.

One of the integral communication methods with many stakeholders, specifically the affected communities and settlements, have been the quarterly E&S Progress Reports (in Turkish) that are shared via the Project [website](http://www.ergotoyol.com.tr/cevre-ve-sosyal-etki-yonetimi/cevresel-ve-sosyal-ilerleme-raporu/) (<http://www.ergotoyol.com.tr/cevre-ve-sosyal-etki-yonetimi/cevresel-ve-sosyal-ilerleme-raporu/>) and distributed to the affected communities as hard copies.

The reports cover general information about the Project; current state of the Project; management of environmental impacts; training, air emissions, water quality and wastewater management, waste management, top-soil management; occupational health and safety studies; management of social impacts; land acquisition local employment, grievance mechanism, disclosure meetings, cultural heritage management; and contact information of the Company. In 2019 and 2020, a total of eight E&S Progress Reports were shared with the affected communities.

During the COVID-19 pandemic, ERG turned all stakeholder engagement activities from face-to-face communication to communication via phone and continued to engage with mukhtars and affected settlements and groups during this period.

Communication Channels with Stakeholder

Website	http://www.ergotoyol.com.tr/en http://www.ergotoyol.com.tr/en/complaint-and-suggestion/
Phone	+90-0312-499-5080 Direct phone numbers of the CLOs are available to communities
Postal address	Gaziosmanpaşa Mahallesi 79/1 Sokak No: 6 M Gölbaşı / Ankara
Email	info@ergotoyol.com.tr
Grievance Boxes and Forms	In all affected settlements Construction Camp Sites
Individual, group and public meetings	Held by CLOs in all affected settlements
Distribution of printed materials	Quarterly E&S Progress Reports (in Turkish) published at Project website and distributed as hard copies in all affected settlements Project brochures distributed as hard copies ESIA Report

Method and Frequency of Communication with Stakeholder Groups

Stakeholder Group	Method & Frequency of Communication	Key Topics & Concerns
National authorities (Ministries, state companies)	<ul style="list-style-type: none"> Face to face meetings Official correspondence Quarterly E&S Progress Reports (in Turkish) published at Project website 	<ul style="list-style-type: none"> Project-related permitting processes Management of Project-level and cumulative E&S impacts
Local authorities (Provincial governorships, district governorships, municipalities, district directorates of the ministries)	<ul style="list-style-type: none"> Face to face meetings Official correspondence Quarterly E&S Progress Reports (in Turkish) published at Project website Bi-monthly collection and management of stakeholder feedback, suggestions, complaints via grievance boxes placed at the affected settlements 	<ul style="list-style-type: none"> Project-related permitting processes Management of the E&S impacts of the Project and cumulative impacts Cooperation for community development projects Emergency preparedness and coordination
State Companies	<ul style="list-style-type: none"> 	
Affected communities and settlements (Settlements heads, local communities affected from Project-related land acquisition and construction phase impacts including vulnerable persons and women)	<ul style="list-style-type: none"> Regular or on-demand face to face meetings with Mukhtars at their offices, construction camp sites or public places, as appropriate Individual or group meetings conducted by CLO and site managers Face to face individual or public/focus group meetings (e.g. with local women) with the affected communities Via telephone or messaging with the Mukhtars and affected communities Project brochures (including LRP), flyers, announcements distributed as hard copies or posted at public boards in affected settlements NTS and SEP distributed in all affected settlements Quarterly E&S Progress Reports (in Turkish) distributed as hard copies in all affected settlements 	<ul style="list-style-type: none"> Management of the E&S impacts of the Project Cooperation to maximise benefits from Project-related employment and supply opportunities Cooperation for community development projects

Stakeholder Group	Method & Frequency of Communication	Key Topics & Concerns
Local businesses located in the vicinity of the Project and those directly affected by the Project	<ul style="list-style-type: none"> On-demand and as required 	<ul style="list-style-type: none"> Management of the E&S impacts of the Project Cooperation to maximise benefits from Project-related employment and supply opportunities
Non-governmental Organization (NGOs) and Civil Society Organizations (CSOs)	<ul style="list-style-type: none"> On-demand and as required 	<ul style="list-style-type: none"> Management of the E&S impacts of the Project and cumulative impacts
Universities		
Media	<ul style="list-style-type: none"> Visual materials/ advertisements/ announcements related to key Project information 	<ul style="list-style-type: none"> Sharing information with the Project stakeholders
Internal Stakeholders (Project employees including direct and contracted personnel of the contractor and main/lower tier subcontractors)	<ul style="list-style-type: none"> Internal Grievance Mechanism Through induction and E&S training Regular and on-demand meetings attended by Project employees (individual or group) Announcement posted at work/camp sites Project-related announcements published on Project-website 	<ul style="list-style-type: none"> Management of construction activities Management of labour risks including occupational health and safety (OHS) Employment opportunities
Lenders (Credit Suisse AG guaranteed by the Danish Export Credit Agency (EKF) and the Swiss Export Credit Agency (SERV), with local financing provided by some commercial Turkish banks)	<ul style="list-style-type: none"> Quarterly Post Financial Close Monitoring Site Visits and E&S Monitoring Reports 	<ul style="list-style-type: none"> Project finance Identification and management of E&S risks and impacts assessment



Grievance Mechanism

ERG Otoyol has placed utmost importance to the implementation of the External (Public) Grievance Mechanism established in line with the requirements of international standards as part of the Project SEP. Through this mechanism, the Company has effectively collected and responded to the complaints and feedback of the local communities about the Project throughout the entire construction period in 2019 and 2018.

The External Grievance Mechanism has included in the following components:

- A grievance and comment form present at the Project's [website](#)
- Grievance boxes placed in 81 affected neighborhoods/villages along the Motorway route
- Grievance forms, boxes and related guidance placed at the main contractor's and subcontractors' camp sites.
- Project CLOs collecting and registering verbal and written grievances through face-to-face meetings (individual or public), phone calls, digital messages, etc.
- Other community facing personnel receiving verbal grievances and conveying them to the Project CLOs for registration and management
- Public administrations (KGM, provincial and district governorships, municipalities, mukhtars and Presidency's Communication Center - CIMER)
- Social-media platforms

All grievances and feedback received through above-mentioned channels have been registered in the Project database and responded within the timeframes specified in the Project SEP. As such, stakeholders stating the grievances are contacted by the CLO within 7 days for confirmation, while the issue is investigated by the relevant units and departments. A full response is communicated via phone/email to the stakeholder within 30 days of receiving the grievance/feedback.

The grievances have been analyzed by the HSE department, Senior Social Expert and the CLOs to identify the root causes and trends by subject, settlement, etc. for preventing repetition to the extent possible and planning the corrective actions.

Number of Grievances

	2019	2020
Public grievances received	74	54
Grievances resolved	71	41

Top five grievance subjects received and for the construction phase included:

- Damage to land and crops
- Dust formation
- Damage to infrastructure
- Damage to house due to blasting
- Restricted access to land

ERG Otoyol has diligently analyzed and investigated the grievances. The corrective actions have been planned and implemented in collaboration with the grievance holder. Amongst the grievances received in 2019 and 2020, 96% and 76%, respectively were resolved, as a result of the actions taken, with confirmation from the grievance holders. Technical investigations and/or action planning/implementation processes with input from third parties as relevant are ongoing for the remaining open grievances.

CULTURAL HERITAGE

The route of the Ankara-Niğde Motorway passes through the heart of Central Anatolia that was home to many important civilizations as with the many parts of Turkey – the Cradle of Civilization. As part of the Project's national EIA, official registry of archaeological sites and other immovable cultural heritage assets in the Project area and its vicinity were obtained from the corresponding Regional Council for Conservation of Cultural Assets. This identified a 1st Degree Archaeological Site on the Motorway's main route – Duguz Hoyuk in Aksaray, which has been avoided with the modification of route to avoid physical impacts on this archeological site.

Being aware of and highly respecting the eminent potential of cultural heritage prevailing along the Project route, with utmost sensitivity and commitment to compliance with international standards, ERG Otoyol commissioned a qualified cultural heritage team to identify and manage the risk and impacts on registered and non-registered/unknown cultural heritage assets to supplement the measures that have been taken during the route selection and national EIA process of the Project.

To this end, a comprehensive assessment of the Project's impacts on cultural heritage has been conducted in line with the national legislation and IFC PS8. This included an intensive field survey program comprising walkover surveys conducted by senior archaeologists along the Motorway route and the Project/associated facilities that could subject to physical impacts of the construction activities, and thorough consultations with the cultural heritage authorities.

These efforts have identified 35 non-registered archaeological sites located within the Project's land acquisition corridor and the footprints of the Project/associated facilities.

A Cultural Heritage Management Plan (CHMP), including the Chance Find Procedure, has been developed in line with IFC PS8. In line with the CHMP, cultural heritage authorities were notified about the non-registered sites discovered/identified as part of the ESIA process. The cultural heritage management firm, which conducted the baseline studies, was contracted by ERG Otoyol to supervise the process with cultural heritage authorities.

For all the non-registered archaeological sites, coordinates and layout plans were submitted to the cultural heritage authorities via official letters in March and June

2018. In these official letters, ERG Otoyol requested the authority's evaluation of the archaeological features of these sites and view on the actions/measures that need to be taken for conservation and management.

In response to ERG Otoyol's official applications, the cultural heritage authorities sent experts to all the sites for field surveys and issued final decisions for all 35 sites. The actions required by the authorities, including salvage excavation works, monitoring, etc. depending on the characteristics of the sites have been fulfilled during the construction works.

Two archaeologists were employed by ERG Construction (the Main Construction Contractor) to secure archaeological monitoring at the potential sites during the ground disturbing activities. All site personnel, direct and contracted, were trained on the implementation of Chance Find Procedure.

Cultural Heritage Sites

Harhar Deresi (KM 75+570 – KM 75+710)

Based on the official notifications done by ERG Otoyol, Ankara No:2 Regional Council for Conservation of Cultural Assets required salvage excavation works to be conducted at the Harhar Deresi site.

Salvage excavation works and subsequent backfilling activities were performed under the supervision of the cultural heritage authorities between 4 – 18 March 2019. Following the completion of salvage excavation works and backfilling, Motorway construction works have continued at this site with the approval of the authorities.

The remainder of the site extending beyond the land acquisition corridor of the Project has been registered by the authorities.



Salvage Excavations at Harhar Deresi



Site Before Backfilling



Site After Backfilling

There were significant archaeological finds identified at the site during the salvage excavation works. These included potteries, animal figures and a stamp, which was considered as the most remarkable artefact since it indicates traces of historical trade activities. The findings indicate that the site dates back to Early Bronze Age (3,000 BC). The potteries and other archaeological finds have been transferred by the Konya Regional Directorate of Cultural Assets and Museums to the Konya Museum.



Archaeological Finds Discovered at Harhar Deresi

Harharbeli (KM 74+500 – KM 74+710)

Based on site investigations of the experts from the Anatolian Civilizations Museum, Ankara No:2 Regional Council for Conservation of Cultural Assets required test pits to be drilled at this site under the supervision of the cultural heritage authorities. Documentation of the site based on the test pits and subsequent salvage excavations was completed in March 2019 and the backfilling works were performed in April 2019 as per the Council's decision that officially allowed the Motorway construction works to resume.



Test Pits Opened Before Salvage Excavations and Backfilling



Site After Backfilling

Yilginli (KM 50+080 – KM 50+085)

Ankara No:2 Regional Council for Conservation of Cultural Assets required relocation of the grave stele at the unregistered fountain on this site to the Anatolian Civilizations Museum. Relocation of this movable cultural heritage asset was completed in June 2019.



Grave Stele at Yilginli Fountain before Relocation

Comlekçilik-1 (KM 223+855 – KM 223+895)

Immovable cultural heritage assets identified at this site have been covered with geotextile material as per the request of cultural heritage authorities. The site has been backfilled and construction activities have continued with the supervision and approval of museum authorities.



Geotextile Cover Application at Comlekçilik-1 Site

Colova (KM 16+770 – KM 16+900)

Colova archaeological site is a slope settlement located west of Colovasi Stream and its basin. Text excavations were carried out under the supervision of Ministry authorities in May 2018. Necessary works such as backfilling, were performed under the Ministry Authorities.

Hanefi Cesmesi (KM 25+850 – KM 25+998)

Hanefi Cesmesi is a flat settlement with ceramic sherds on the surface area throughout to date to the Early Bronze Age. Also, a graveyard of the Islamic Period was observed in the north of this settlement. Excavations were carried out in May 2018 and the required works such as backfilling were performed under the supervision of Ministry authorities.

Gavurkale-2 (KM 32+280 – KM 32+450)

Gavurkale-2 is a settlement mound with archaeological remains on top of it remaining. Enlargement excavations were performed at site following the text excavations in June 2018 in accordance with the decision taken by the Ankara No:1 Regional Council for Conservation of Cultural Assets. According to the decision of the Ankara No: 1 Regional Council for Conservation of Cultural Assets, excavations were conducted by the Anatolian Civilizations Museum experts. The Museum Authorities decided to transport the remainings to the Anatolian Civilization Museum and the necessary works such as backfilling were performed.

Chance Find Site: Yılanlı Kaya Graveyard (KM 26+000)

As a result of the exhaustive cultural heritage baseline surveys conducted *prior* to the start of construction works, there had been a single chance find site discovered during the construction works. Chance Finds Procedure was applied for Yılanlı Kaya Mezarı (Graveyard) on May 23, 2018. The Ministry of Culture and Tourism issued a decision for this site on October 25, 2018 (numbered 6073), stating that construction works are permitted to continue under the supervision of experts from the Anatolian Civilizations Museum.



Yılanlı Kaya Graveyard

LABOUR

ERG Otoyol regards its employees as the primary resource it has for being a respected Company and delivering a successful Project. The welfare and the safety of the Project's labour force is the key to ensure the required quality standards within the targeted timeframes.

ERG Otoyol has developed and implemented a Human Resources (HR) Policy incorporating the corporate values of integrity, honesty, respect and empowerment for the management of Project workforce.

The Ankara-Niğde Motorway Project has been a massive undertaking, which required employment of significant workforce. In 2019 and 2020, the Project has provided direct employment opportunities to a total of 140 thousand persons under the body of the ERG Otoyol along with the Main Construction Contractor (ERG Construction) and all main and lower tier subcontractors.

Cumulative total of 302 and 383 subcontractor firms were involved in the Project in 2019 and 2020, respectively. The majority of the Project employees are of subcontractor firms. Total number of employees, specifically from subcontractors, have fluctuated throughout the construction phase especially with the seasonality and completion of Project sections being the main drivers. Winter season (December 2019 until February 2020) saw a decline in employees, as well as the completion of Sections 1 and 3, which were operational as of 4 September 2020. Field work in Section 2 continued into December 2020, which became operational on 16 December 2020.

The number of employees peaked in August 2019 with 9,142 personnel including all direct and contracted employees in three Project sections. On average, 2% were female and 98% were male.

ERG Otoyol employees consisted of a total of 53 people in 2019, which was the peak construction year, which reduced to 37 people in 2020 with Project progressing toward operation. Both years averaged a 38% female to 62% male employee ratio.

Number of Employees by Age Groups and Gender within ERG Otoyol

	2019		2020	
	Female	Male	Female	Male
ERG Otoyol Employees				
Under 30	6	10	4	6
From 30 to 50	9	15	7	11
Above 50	5	8	3	6
Total	20	33	14	23

In line with the Project HR Policy, employment of local people was given priority to the extent the safety and qualification criteria could be met by the candidates. Throughout the Project construction phase, 55% of the site personnel have been hired from the provinces crossed by the Motorway.

The HR Policy of the Company compliant with the national legislation and international standards safeguards non-discrimination and prevention of child labour and forced labour across the entire Project employees. This calls for employment based on the principle of equal opportunity and fair treatment, and avoidance of discrimination with respect to any aspects of the employment relationship such as recruitment, terms of employment, promotion, working conditions, access to training, compensation, termination of employment retirement and disciplinary practices. Harassment, intimidation and exploitation is strictly avoided with a special attention to women employees and migrant workers. The rights of the employees to form and to join any worker's organizations of their choice, and the right to collective bargaining is warranted by the Project HR Policy.

The Internal Grievance Mechanism provides for the channel for all employees for raising any labour and working condition related grievance and implementation of corrective and improvement actions founded on the principles of the HR Policy.

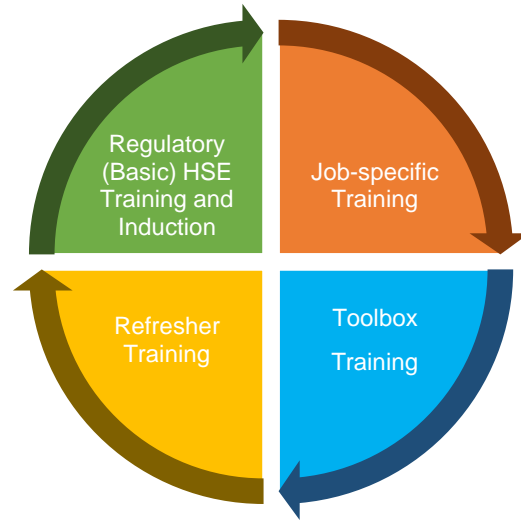
A Labour and Working Conditions Due Diligence was undertaken by RINA in April 2019. The study identified the areas where improvement is required to enhance labour standards such as accommodation conditions in the subcontractor camp sites, grievance mechanism, wages, benefits and working conditions. A total of 51 actions were identified as a result of the audit and the Company completed implementation of all actions by November 2019.

TRAINING AND DEVELOPMENT

The HR Policy of ERG Otoyol calls for a comprehensive training program to ensure that employees have the necessary knowledge and skills required to complete their tasks safely, effectively, and efficiently. To this end, keeping the skills and knowledge of employees up-to-date and supporting their professional and personal development is at the forefront of ERG companies' priorities.

ERG Otoyol has in place an Environmental and Social Monitoring and Training Plan to ensure continuous and effective implementation of the strategies and measures set by the E&S Management Plans and achieve Project HSE goals.





All employees, direct and contracted, are provided with regulatory (basic) HSE training and induction at the time of employment, prior to starting their jobs. This training includes the following topics:

- General EHS Aspects
 - Labor legislation, employee rights, OHS culture and rules, workplace order.
- Health
 - Reasons of occupational disease, illness protection, biological & psychological risk factors, first-aid, harms of tobacco.
- Technical
 - OHS culture and rules, chemical, physical and ergonomic risk factors, physical labor, fire and explosion protection, safe equipment use, electricity risks, case studies of work accidents, evacuation.

➤ Environmental and Social

- Stakeholder engagement, grievance mechanism, waste management, pollution sources, cultural heritage management and chance find procedure, etc.

Upon employment, employees receive various trainings according to their specific tasks, such as:

- Professional Competency Training
- Quality Training
- Job-Specific Training
- Emergency Preparedness and Response Training
- Advanced Driving Techniques Training
- Daily on-the job (toolbox) Training
- COVID-19 pandemic related Training (starting from March 2020)

As required, these trainings are conducted by external H&S professionals or in-house OHS Specialists.



Within the scope of this Project, a total of 593,295 hours of training has been provided. Average training hours per employee was 16.7 hours for ERG Otoyol in 2019 and 2020. The training hours (including job-specific trainings and toolbox talks) averages are higher for Contractor and subcontractor employees with 42.7 in 2019 and 33.9 in 2020.

Employee Training in Numbers

	2019		2020	
	Female	Male	Female	Male
Total training man-hours (employee x hour)				
ERG Otoyol	334	550	234	380
Contractors / subcontractors	5,091	273,108	5,215	191,574
Average training hours per employee				
ERG Otoyol	16.7	16.7	16.7	16.7
Contractors / subcontractors	42.7	42.7	33.9	33.9



OCCUPATIONAL HEALTH & SAFETY

The OHS Policy of ERG Otoyol warrants a “Zero Harm” approach to provide a working environment that is safe and without risk to health and safety of the Project employees as required by the national legislation and international OHS standards and good practices.

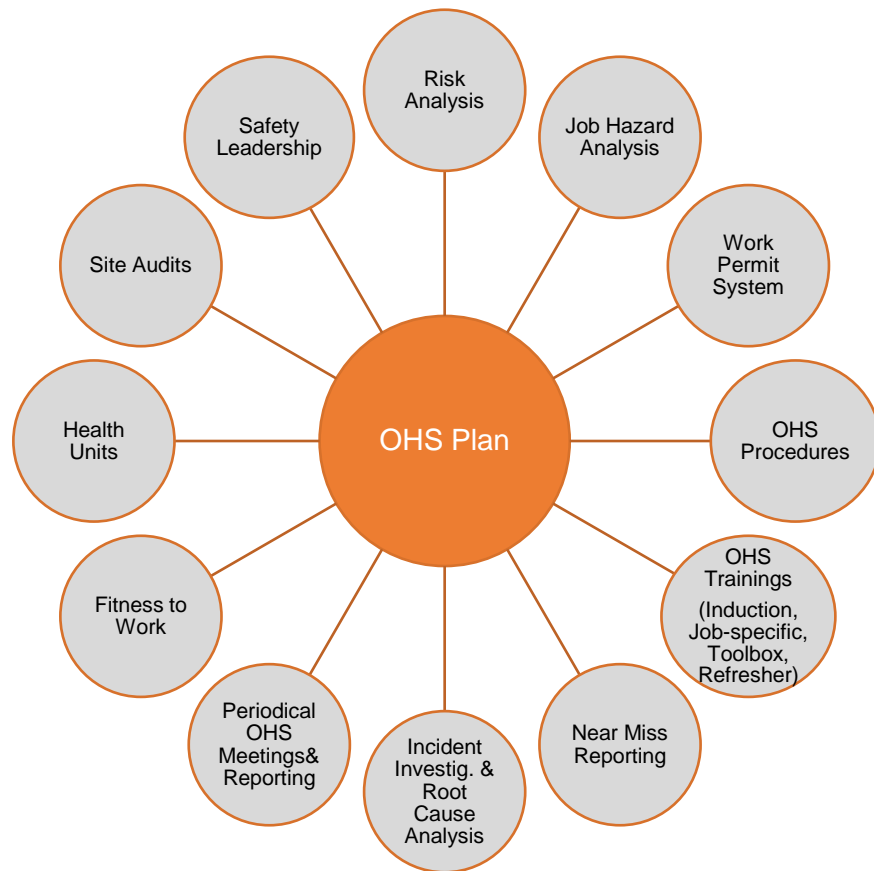
The OHS Management System of the Project is certified against the ISO 45001. The underlying principle of this system is to achieve Zero Harm with the objective of adopting “Safety First” approach and having no lost time injuries. This calls for the following:

- Safe and healthy working conditions through design and maintenance of safe work systems
- Systematic and continuous identification of OHS related risks and hazards and development of immediate measures
- Adequate machinery with proper maintenance
- Appropriate general and job-specific H&S training to improve competence and confidence
- Arrangements for regular engagement and consultation with employees on day-to-day health and safety
- Implementation of emergency and evacuation procedures in case of significant incidents
- Undertaking periodic review of OHS performance and related documentation to further enhance implementation effectiveness

The OHS risks and impact of the Project has been initially identified in the ESIA Report. This included risks and impacts stemming from physical hazards such as collisions with moving objects and machinery, working at height, ergonomic injuries, injuries from blasting activities, slips and falls as well as other specific hazards that may arise in the absence of proper preventive and mitigative measures.

OHS Plan

Prior to the start of Project implementation, in June 2018, ERG Otoyol has developed an OHS Plan meeting the requirements of the national legislation and international OHS standards.



Key Components of the OHS Plan

During the construction phase, the OHS aspects of the Project were managed by the HSE Coordinator of the Company, who worked in coordination with the H&S Manager of the Main Construction Contractor (ERG Construction) and an external specialist company (ESSA Health and Safety; <http://www.essa-isg.com/>) which provided H&S services to the Project in line with the requirements of the applicable national OHS legislation. In each Project section, an OHS Chief was appointed under the Main Construction Contractor to supervise and oversee the site OHS implementations.

ESSA conducted a detailed H&S risk analysis of the Project as per the requirements of the national legislation, developed necessary job hazard analysis and mitigation measures in the form of OHS procedures, and established a work permit system based on the outcomes of the risk analysis.

A robust incident/accident investigation and reporting system has been established. This included a well-functioning near miss reporting and evaluation system. Root cause analyses were conducted for accidents and near miss incidents with high significance. Outcomes of the root cause analyses were shared with all relevant Project teams through toolbox trainings, monthly OHS committee meetings, etc. to take necessary measures/actions for avoiding repetitive incidents. In case of accidents and major near miss incidents, risk analysis documents have been revisited to reflect requirement improvements/actions.

Each main construction camp site that served the Project during the construction phase was equipped with an infirmary, patient transfer ambulance and medical equipment and kits. Medical staff including a doctor were available at the infirmaries in line with the requirements of the national legislation. Employees' personal health-related information were kept strictly confidential.

For consistency of OHS standards and implementations across the entire Project, the Contractor and all subcontractors received the H&S services from the same H&S Company. Accordingly, the H&S procedures developed under the OHS Plan of the Company, training plans and materials, incident investigation and reporting systems and all other OHS aspects of the Project were standardised.

The external specialised H&S Company had auditing and implementation specialists on-site. During the peak construction phase, 1 health and safety specialist per 100 employee was appointed within the Project, exceeding the minimum legal minimum legal requirement determined in the national legislation. In August 2019, at the peak construction phase, 215 health and safety specialists from the external company

were providing OHS services at different Project sites. Apart from the audit and implementation specialists on-site, a road safety team was established to check the Project's vehicles'/trucks' activities and use of road. During the peak period of the Project, 33 road safety team members were on-site with 11 special vehicles for their work activities.

Occupational Health and Safety Statistics

Parameter	2019		2020	
	ERG Otoyol	ERG Construction + Subcontractor	ERG Otoyol	ERG Construction + Subcontractors
Manhour of the Project	119,250	21,465,963	83,250	16,853,914
Number of Fatalities	-	4	-	2
Rate of Fatalities	-	0.19	-	0.12
Number of Work Accidents	-	713	-	404
Rate of Work Accidents	-	33.2	-	24.0
Number of Lost Time Accidents	-	291	-	194
Number of Lost Workdays resulting from Accidents	-	1,587	-	945
Number of work accidents resulting with First aid	-	405	-	203
Number of Near Miss Incidents	-	584	-	218
Number of Medical Examinations	-	26,326	-	17,891

All OHS risks and non-compliances identified through OHS Plan implementation were communicated to the Project management, site chiefs and related department managers through instantaneous messaging via online chat groups, toolbox trainings, monthly OHS Committee Meetings and periodical reports.

H&S Trainings

As part of the OHS Plan implementation, in addition to the regulatory OHS trainings provided at the time of the employment, all Project employees, direct and contracted, have been trained on the Project-specific OHS Policy, plan and procedures and job-specific hazards and measures. All trainings were documented by the HSE department.

Until the end of 2020, OHS trainings were given for a total of 593,295 man-hours to 238,160 employees in total.

Toolbox trainings were designed to cover over 100 different H&S related topic and delivered on a daily to weekly basis depending on the risks and hazardous of the work sites and job types.



On 30 August 2019, ERG Otoyol carried out a refresher training at all work sites along the Motorway by stopping the construction activities for a full day. The refresher training covered a total of 7,305 site workers corresponding to 22,000 man-hours.



In February 2020, a H&S Workshop was held in Copenhagen – Denmark with the objective of raising safety culture within the Project through a technical collaboration with the Project management and leading Danish companies and consultants. In total, 21 delegates from ERG Otoyol, Main Construction Contractor and main subcontractors attended the Workshop with CEO level representation.



H&S Monitoring and Audit

The status of implementation of the OHS Plan components by the Main Construction Contractor and the subcontractors of the Project were monitored internally by the HSE department with support from ESSA and externally by the Lenders as part of the quarterly Post Financial Close E&S Monitoring.



In May 2019, a third-party H&S Review Audit was completed by Marsh Risk Consulting. The objective of this Audit was to carry out a review of H&S processes of the Project to determine areas of improvement in line the national legislation, IFC Performance Standards and industrial best practices. The Audit has identified 93 actions for improvement. All actions were closed by the Project Company throughout the construction period.

COVID-19 related OHS Measures

Date	Mitigation Measure
Policies, plans, assessments	
March 2020	<ul style="list-style-type: none"> 'Pandemic Crisis Management Plan' and 'Pandemic Prevention Emergency Action Plan' developed. Project's Emergency Action Plan and Emergency Response Procedure revised considering the pandemic.
April 2020	<ul style="list-style-type: none"> Revision of COVID-19 Outbreak procedure; distribution of the revised procedure to subcontractors. State of Emergency Management Plan for Pandemic was prepared. Disposable Hygiene Materials provided to all subcontractors. Revision of Project risk assessments. Hygiene and disinfection and social distancing internal audits conducted
Communications and management	
March 2020	<ul style="list-style-type: none"> COVID-19 Committee was created.
April 2020	<ul style="list-style-type: none"> Outbreak Disease Crisis Coordination Meetings were conducted. Specific WhatsApp Groups established to communicate with all Health units for planning and managing the spread of COVID-19. Personnel on leave were informed via SMS about the procedure in place that says it is an obligation to see HR Department and infirmary first when they return back to work to control of fever. Distribution of government circulars, regulations and COVID-19 posters.
Training	
February 2020	<ul style="list-style-type: none"> COVID-19-related training and toolbox talks in all camps and workplaces. Training is conducted in open areas and keeping social distancing. COVID-19 posters hung in camps and workplaces.
OHS Measures	
March to December 2020	<ul style="list-style-type: none"> The number of healthcare personnel in all sections was increased. Distribution of surgical face masks and gloves for employees carried out daily.

Date

Mitigation Measure

- Daily disinfection of all camp sites and construction work areas were conducted (including common areas).
- Closure of recreational and certain common social areas that were deemed not essential.
- In the dining hall, fork-spoon-knives and condiments (such as salt and pepper) started to be distributed in closed packets.
- Pandemic Isolation Camp Areas (in 13. km campsite and 91. km campsite) were established which are approved by Government Health Unit that visited the campsite due to a COVID-19 positive case at 91. km in April 2020.
- Creation of shift systems during meals to accommodate for social distancing.
- Disinfection conducted on shuttle buses.
- Daily body temperature checks implemented at all camp sites and shuttle buses (each shift), as well as for vehicles and visitors (who are directed to the infirmary units).
- Remote working has been permitted for personnel who can work from home.
- Virtual meetings have been prioritised. Where face to face meetings are indispensable, number of attendants have been restricted.
- Additional wellbeing options provided at worker camps (e.g. providing televisions in each bedroom; additional internet access; organising virtual exercise classes, faith group sessions or similar: all these options were already available).
- Redistribution for all the dormitories/camp sites has been arranged in order to facilitate social distancing.
- Mandatory use of mask and gloves for Project personnel.
- Alcohol-based hand sanitiser placed in work locations and campsite.
- Colour-code ID system created to minimise contact between personnel staying in a camp, coming by private car or vehicle and sub-contractors.
- If a worker was transferred from one camp to another, the workers were quarantined in the Pandemic Isolation Camp for 14 days.
- New employees and workers back from leave also have to stay for a period of 14 days in the Pandemic Isolation Camp before starting or resuming work.
- All service buses carry half of their regular capacities in any one time.



COMMUNITY HEALTH & SAFETY

ERG Otoyol has shown utmost sensitivity towards community health and safety (CHS) throughout the construction phase. Traffic safety, pedestrian safety and emergency preparedness and response were considered as the most important CHS issues in the planning of community health and safety measures for the construction phase. Throughout the construction period in 2019 and 2020, the Project did not result in any accident or incident involving CHS related risks and/or impacts.

In consideration of the long-term safety of the infrastructure that will serve the public throughout the life of the Motorway and based on the findings of the site-specific geological, geotechnical and hydrogeological surveys and assessments done by the experts, the Project has been designed and constructed in full compliance with the national legislation, KGM's technical specifications and international standards such as the AASHTO SSHB (Standard Specifications for Highway Bridges, 2002). As a requirement of the BOT Contract, competent and reputable technical consultants were appointed by the KGM for reviewing and verifying the Project design and supervising the construction works to ensure fulfilment of technical and quality standards.

Through the implementation of the following management plans by the Contractor and all subcontractors during the construction phase, ERG Otoyol has avoided/minimised risks on the health, safety and security of the local communities and third parties present in the close vicinity of construction sites:

- Community Health and Safety Plan
- Stakeholder Engagement Plan (including an External Grievance Mechanism)
- Emergency Preparedness and Response Plan
- Traffic Management Plan
- Air Quality and GHG Management Plan
- Noise and Vibration Management Plan
- Waste Management Plan
- Water and Wastewater Management Plan

The Project design has embedded the integration of “**Intelligent Traffic Systems**” that secures, inter alia, transportation safety, minimisation of the traffic accident risks and protection of life and property, timely detection and management of potential hazards and risks stemming from the current traffic flow conditions, meteorological conditions, etc., effective response to emergencies, accidents, etc. and uninterrupted communication and remote control of the entire network.

With the integration of this system bringing in the state-of-art technologies embodying both the global and national know-how and solutions to the Project, Ankara-Niğde Motorway has been entitled “**Turkey’s Most Intelligent Motorway**” since its commissioning in 2020.



Intelligent Traffic System Components

COVID-19 Pandemic

As the entire world, one of the major challenges of ERG Otoyol in 2020 was the COVID-19 pandemic declared by the World Health Organisation (WHO), with the outbreak of the first COVID-19 case in March. As of March 12, the first restriction decisions came into effect throughout Turkey, and the scope and duration of the restrictions varied throughout the year depending on the increase and decrease of the case numbers.

At the end of 2020, the cumulative COVID-19 cases in Turkey reached to 2,208,652 according to data published by the Ministry of Health. Turkey has started its vaccination program with people over age of 65 and healthcare professionals as 2020 is over.

During this COVID-19 pandemic period, ERG Otoyol has taken great care to take and fulfill all required measures to protect both its direct and contracted employees and the public. Apart from the legally identified COVID-19 measures and requirements, ERG Otoyol has prepared a Pandemic Prevention Emergency Action Plan and an Epidemic Illness Emergency Procedure in March 2020, which have been implemented across the Project by the Contractor and all subcontractors.

With the intensive care and mitigation measures put in place by ERG Otoyol, the Main Construction Contractor and subcontractors, total number of personnel (direct and contracted) with COVID-19 positive results in 2020 was 271, whereas the number of personnel isolated within Project due to close contact with positive cases was 1,045. There are no fatalities among the Project personnel due to COVID-19.

To combat against COVID-19 related risks, working with shift system was practiced in 2020 and isolation facilities were established as part of the implementation of the Action Plan. Personnel above 65 years old or with chronic diseases were given leave in line with the Circular of the Ministry of Family, Labour and Social Services. Workplaces/sites and dormitories of the Contractor and subcontractors have been periodically disinfected.

The Ministry of Environment and Urbanization issued a Circular entitled 'COVID-19 Measures for the Waste Management of Single Use Masks, Gloves and Other Personal Hygiene Materials' (No. 2020/12) on 7 April 2020 in order to manage waste generated due to COVID-19. Throughout 2020, the COVID-19 related wastes (masks, gloves, personal hygiene materials) were managed in accordance with the Ministry Circular to avoid potential health and safety risks on the community health and safety.



SUBCONTRACTOR AND SUPPLY CHAIN MANAGEMENT

The Ankara-Niğde Motorway is a massive infrastructure which has been delivered with the involvement of a multitude of subcontractors and suppliers, which were guided by ERG Otoyol's E&S Policies, ESMS and management plans incorporating the national requirements and international standards applicable to the Project. In 2019, total of 302 different subcontractors had involved in the Project, whilst this figure has increased to 383 in 2020 as the Project progressing towards commissions with completion of the majority of the construction works. With the commissioning of the Motorway in 2020, the works of the majority of the subcontractors in the Project have been completed.

In line with the Social Policy of ERG Otoyol, local employment and procurement was prioritized in the Project to optimize the associated costs (e.g. transportation, logistics, etc.) and maximize the Project benefits for the local communities as well as businesses.

With the objective of ensuring compliance of subcontractor activities with the Project Standards and administrative and technical requirements including timely delivery and quality of work, ERG Otoyol has established a robust subcontractor management system based on the Project ESMS. To this end, an ESMS Protocol was executed between ERG Otoyol and ERG Construction (Main Construction Contractor) on August 13, 2018, securing Contractor's direct commitment to comply with the Project ESMS and implement the E&S management plans of ERG Otoyol in all Project related activities. Regarding the management of subcontractors, this Protocol also dictates to compliance of subcontractor activities with the same E&S requirements. Accordingly, ERG Construction executed ESMS Protocols with the main subcontractors to cascade down the Project E&S requirements from top to bottom with the objective of ensuring consistent E&S practice compliant with the standards across the entire Project.

With the commissioning of the Motorway in 2020, two main contractors are responsible from the operation and maintenance (O&M) and services:

- ERG O&M Company for the maintenance and operation works
- ERG Service Areas for the operation of the service areas throughout the Motorway

Procurement Management

Procurement processes of the Project has been guided by the Procurement Procedure of ERG Otoyol that sets forth the overall terms of subcontractor management and relevant requirements. As the Project Company, ERG Otoyol evaluates and selects its subcontractors and suppliers according to the "ability to provide products/services in accordance with Project's requirements". The evaluation and selection of suppliers is conducted by related departments that request purchasing.

Evaluation process is carried out based on, inter alia, the following criteria:

- ISO Certifications
 - ISO 9001 Quality Management Systems,
 - ISO 14001 Environmental Management Systems,
 - ISO 45001 Occupational Health & Safety Management Systems,
- Time of delivery
- Reasonable prices
- Compliance with the terms and conditions stated in Purchase Contract/Specification

ERG Otoyol has supported local communities and businesses through prioritizing procurement of products and services from local suppliers (from the provinces Motorway crosses). Approximately 90% of the materials and equipment used within the Project have been supplied from domestic suppliers.

The Project-related procurement processes were built on the following key principles:

- Local supply of goods and services are maximized.
- Top priority is given to local suppliers who can provide necessary qualifications in accordance with ERG's policies and tender conditions.

- Information on the local procurement process is available to contractors, suppliers, service providers and the public at large, unless there are valid and legal reasons to keep certain information confidential. When a local procurement requirement is published or made available to the market, the announcement contains sufficient details for interested contractor, suppliers and service providers to understand it in order to determine if they are qualified to compete.
- Sustainable business models are established and managed with local suppliers/sub-contractors.
- Procurement of goods and services are assigned to categories considering their specifications, types, accessibility in the locality area, etc.
- Labour-intensive businesses are especially selected from the local area to ensure that highest indirect job opportunities are created for local communities,
- All local suppliers are monitored to ensure an ethical and transparent attitude.

Subcontractor Management

ERG Otoyol required the Main Construction Contractor (ERG Construction) to develop and implement a Subcontractor Management Plan in line with the requirements of IFC Performance Standards. Through the implementation of this Plan, Project E&S Standards have been incorporated to the subcontractor evaluation, selection and management processes.

The method for subcontractor evaluation and selection is based on the Procurement Procedure and Construction Subcontractors Evaluation Instructions.

The main criteria for subcontractor evaluation and selection are compliance with the ISO 9001, ISO 14001 and ISO 45001 Management Systems. In addition, work experience and work completion documents are taken into account.

The main criteria for the evaluation of subcontractors have included the following:

- Past environmental, social and OHS performances, including health and safety records
- Notifications on material labour issues between workers and management
- Fines and sanctions imposed by environmental, social and workplace regulators/authorities
- Security management records of previous projects
- Grievance records and reports on OHS

The following criteria have been included in the contracts executed with the subcontractors:

- Project specific E&S requirements
- Personnel allocation
- E&S management/implementation plans to be developed by the subcontractor
- OHS training and monitoring requirements
- Open commitments to comply with the Project requirements
- Bill of quantities (including cost and time schedule)
- Fines/sanctions
- Incentives to motivate good environmental and social performance
- Statements regarding non-compliances in environmental and social subjects

Based on these criteria, a pre-classification system has been established and implemented as part of subcontractor selection process. Subcontractors that do not meet the Project's OHS and environmental and social standards have been disqualified to work within the Project.

Particular attention has been paid to the selection of subcontractors to complete the work on time, within the given budget and in a safe working environment. Subcontractor performances and implementation status of Project Standards have been evaluated annually.

Subcontractor/Supplier Environmental and Social Assessment²

Indicator	2019	2020
Subcontractor/Supplier Selection and Evaluation		
Number of new subcontractors/suppliers that were screened using environmental and social criteria	28	7
Percentage of new subcontractors/suppliers that were screened using environmental and social criteria	84.8	87.5
Subcontractor/Supplier Management		
Number of subcontractors/suppliers evaluated for environmental and social impacts	28	38
Number of subcontractors/suppliers identified as having significant actual and potential negative environmental and social impacts (*)	25	5

(*) Non compliances related to lack of documentation, lack of environmental and social trainings, waste management, and leakages and spillage management.

Employed subcontractors are obliged to establish and implement plans and procedures specific to the job they undertake, in accordance with the Project Standards, procedures, programs and management plans.

The conformance of subcontractors is reviewed through the implementation of the Internal Audit Procedure performed by the Main Construction Contractor and reviewed by ERG Otoyol, as well as the periodic monitoring reports that are prepared by subcontractors on workforce, OHS, community health and safety, environmental subjects, safety regulations. The frequency of the subcontractors and suppliers to be audited depended on the scope of their work, the duration of their contract and the capacity of the companies.

Number of Internal Audits

Indicator	2019	2020
Number of Audits Conducted	19	53
Number of Non-compliances Identified in Audits	239	274
Percentage of Non-conformities Closed within the Same Period	97%	72%

Outcomes of the internal audits including the observed non-conformities were conveyed to Project management, related departments and subcontractor and supplier Project management teams.

² Majority of the Project's subcontractors have started to work in the Project in 2017 and 2018 as the BOT Contract of the Project was signed in 2017.

SOCIAL COMPLIANCE

In line with its corporate culture and Project-specific Social Policy, ERG Otoyol recognizes good management of social considerations as the highest corporate priority and is committed to the establishment of sustainable relationships with its stakeholders, in particular with those communities surrounding its projects. ERG seeks relationships which demonstrate mutual respect and understanding, active partnership and long-term commitment.

The Company implements an E&S Management System for its operations which seeks to minimise and mitigate any adverse social impacts generated by its activities on the livelihoods of the local communities affected from Project-related land acquisition, cultural heritage assets, etc. and to enhance beneficial social impacts in accordance with international best practices.

For the management of Project's physical and economic displacement impacts on local communities stemming from Project-related land acquisition, ERG Otoyol, with support from specialist consultants, has developed and implemented a Livelihood Restoration Plan (LRP) and a Resettlement Action Plan (RAP) in accordance with the requirements of applicable international standards including IFC Performance Standards.

Through the effective implementation of Project SEP including an External Grievance Mechanism, ERG Otoyol has established transparent and strong relations with the local communities. The Company has strived and will strive for maintaining these relations throughout the Project with the objective of having the support of all Project stakeholders to ensure continuous improvement of Project's E&S performance and maximizing its benefits for ERG, for local communities and for the entire nation.

CORPORATE SOCIAL RESPONSIBILITY

ERG Otoyol has in place a Project-specific Corporate Social Responsibility (CSR) Policy that sets out Company's approach and focus areas for contributing to the development of the local communities along the Project route.

In line with its commitment to continually improve the social performance of the Project, ERG Otoyol has identified the focus areas of the CSR Policy as below;

- Development of agricultural education programs and incentives
- Contribution to employment and local economies through certified vocational training and skill development programs
- Supporting the agricultural livelihoods of the local communities with projects to be developed consistent with the Project LRP
- Supporting underprivileged school children through scholarships

ERG Otoyol is committed to develop and implement specific community development projects in line with the CSR Policy based on the needs of the local communities.



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