



SAGANAK ENERJİ

**SAGANAK ENERJİ YATIRIM
URETİM VE TİCARET A.Ş.**

KANDIRA WIND POWER PLANT

**EMERGENCY PREPAREDNESS
AND RESPONSE PLAN**

DECEMBER 2020

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ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
EHS	Environmental, Health, and Safety
EPRC	Emergency Preparedness and Response Coordinator
EPRT	Emergency Preparedness and Response Team
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
HSE-Q	Health, Safety, and Environment - Quality
IFC	International Finance Corporation
MSDS	Material Safety Data Sheet
OHS	Occupational Health and Safety
Plan or EPRP	Emergency Preparedness and Response Plan
PPE	Personal Protective Equipment
Project	Kandira Wind Power Plant
PSs	Performance Standards
Saganak Project Owner	or Saganak Enerji Yatırım Üretim ve Ticaret A.Ş.
SGK	Social Security Institution
WPP	Wind Power Plant

1. PURPOSE AND SCOPE

The Emergency Preparedness and Response Plan (“the Plan” or “EPRP”) has been developed in accordance with Saganak Enerji Yatırım Üretim ve Ticaret A.Ş. (hereinafter referred to as “Saganak” or “the Project Owner”) policies, with the commitments undertaken by Saganak in the Environmental and Social Action Plan (ESAP) prepared for the Kandira Wind Power Plant (WPP) Project (“the Project”) and in accordance with Turkish regulatory framework, with International Finance Corporation (IFC) Performance Standards (PSs), and with IFC General and Sector Specific Environment, Health and Safety (EHS) Guidelines and Asian Infrastructure Investment Bank’s (AIIB) Environmental and Social Framework (ESF). Where no national regulation, IFC standard/guideline or AIIB standard applies, the Plan considers the adoption of Good International Industry Practices (GIIP).

1.1 Purpose

The general purpose of this EPRP is to manage emergency situations may occur in the construction and operation stages of the Project and to describe various measures to ensure the management and minimization of environmental and health risks and impacts. The plan aims to achieve these by incorporation of local legislation, requirements of IFC, AIIB and international best practice procedures.

1.2 Scope

This plan is applicable to all possible emergency situations may occur by natural or unnatural reasons, employee-induced and contractor or subcontractor-induced emergency situations as part of the Project. It identifies all tasks and responsibilities related to the emergency situations, and also provide guidelines for emergency cases described in the next sections and applicable reporting requirements as well. These assessments/measures are applicable to all Project personnel, contractor and subcontractor personnel and the general public (including any governmental authority or similar site visitors) and covers both construction and operation phases.

This Plan will be updated as and when necessary. The scope of the Plan includes following aspects:

- Legislative requirements and standards
- Roles and responsibilities
- Provisions/measures regarding management of emergencies
- Provisions/measures regarding criminal emergencies
- Provisions/measures regarding natural emergencies
- Provisions/measures regarding social emergencies
- Provisions/measures regarding industrial and other emergencies
- Provisions/measures regarding spill and response procedures
- Monitoring and Reporting
- Training of personnel regarding EPRP issues
- Review and update

2. LEGISLATIVE REQUIREMENTS AND STANDARDS

2.1 Turkish Legal Framework

Turkish Legislation that the Project will comply with are given below:

- Regulation on Emergencies in Workplaces
- Occupational Health and Safety Law No. 6331
- Regulation on Risk Assessment of Health and Safety
- Regulation on Occupational Health and Safety Services
- Regulation on Occupational Health and Safety Signs
- Regulation on Principles and Procedures for Occupational Health and Safety Training of Employees
- Regulation on Health and Safety Measures to be taken in Workplace Buildings and Annexes
- Regulation on the Health and Safety Conditions on the Use of Work Equipment
- Regulation on the Occupational Health and Safety Requirements for Construction Sites
- Regulation on the Occupational Health and Safety Requirements for Temporary or Fixed-Term Employment
- Regulation on the Occupational Health and Safety in Construction Works
- Regulation on Safety and Health in Working with Chemical Substances
- Regulation on the Protection of Buildings from Fire
- Regulation on Emergencies in Workplaces
- Regulation on First Aid
- Regulation on Duty, Authority, Responsibility of Occupational Physicians
- Regulation on the Preparation and Disposal of Safety Data Sheets for Hazardous Substances
- Regulation on the Classification, Labeling and Packaging of Materials and Mixtures
- Regulation on the Prevention of Major Industrial Accidents

2.2 International Standards and Guidelines

Applicable International Finance Institutions (IFIs) standards and guideline requirements for the emergency preparedness and response management are provided in the following references:

- IFC PSs
- IFC General Environmental, Health, and Safety (EHS) Guidelines
- IFC General EHS Guidelines for Wind Energy
- IFC General EHS Guidelines for Electric Power Transmission and Distribution
- AIIB Environmental and Social Framework
- AIIB Environmental and Social Standards (particularly ESS1)

Aforementioned standards and guidelines set a framework to adopt of best guidance for emergency preparedness and response management, and address some aspects of project activities which may have an impact beyond the life of the Project and practices across all aspects of project operations with the goal of preventing infrastructural damages, emergencies, accidents and minimizing risks on the Project personnel and the community.

3. ROLES AND RESPONSIBILITIES

Managing Director

- Owner and confirmatory of this plan
- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan
- Controls and confirms the objectives related with management activities of Emergency Preparedness and Response Plan.

Project Manager

- Develops, implements, circulates and maintains this Plan.
- Provides sufficient resources to implement the requirements of this Plan.

Construction/Operation Manager

- Complies fully with applicable requirements of this Plan.
- Reports to the Project Manager issues impacting on the implementation of this Plan.
- Ensures that the contractors are fulfilling their contractual obligations and reports any nonconformity to Project Manager.
- Assigns an Emergency Preparedness and Response Coordinator (EPRC), which also could be the manager himself/herself.
-

Administrative Affairs Manager

- Ensures that all employees are aware of, and appropriately trained on the implementation of this Plan.

HSE-Q Expert

- Contributes to the implementation of precautions related to EPRP objectives.
- Checks whether this plan fits with the project standards and other agreements or not
- Operator of this plan and controls the contractors' application.
- Coordinates with Construction/Operation Manager in the implementation of this Plan.
- Facilitate medical services for non-life threatening, serious injuries requiring ambulance. If there are issues with these services, communicates the issues to the Construction/Operation Manager and Project Manager.
- Facilitates face-to-face meetings with local medical facility.
- Facilitates face-to-face meetings with the firefighting team.
- Conducts emergency drill(s) prior to the first nacelle being erected and have that drill recorded.
- Ensures that all persons who are present on site have access to emergency instructions and contact information of emergency response teams.
- Gives Plan-related training to employees and visitors.
- Ensures that emergency response equipment is present on site at all times in good condition, and strategically placed to provide 30 minute response to all turbines where technicians are working.
- Performs routine inspections.
- Follows the field applications.
- Researches the situation and reports properly.
- Prepares the statistics / performance reports.

Community Liaison Officer

- Logs grievances from members of the public with respect issues covered in the scope of this Plan.
- Coordinates communications with the community representatives as presented in this Plan.

Contractors

- Ensures compliance with the Project-specific emergency preparedness response approach in accordance with the contractual requirements.
- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.
- Ensures the effective implementation of this Plan by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities under contractors' responsibility.
- Provides relevant monitoring data and monitoring reports to Saganak as required.
- Stipulates Saganak's policies and standards to any subcontractor for duly implementing requirements.

4. EPR MANAGEMENT

4.1 General Information

4.1.1 Workplace Information

Table 1 Workplace Information

Name of the Company	
Address of Site	
Phone	
Fax	
Field of Activity	
Hazard Class	
Number of Employees	
Tax Office/Tax No	
Shift Work and Duration	
Total Area of Use (m ²)	

4.1.2 Employer/ Employer's Representative Information

Table 2 Employer/ Employer's Representative Information

Name Surname	
Job Title	

4.1.3 HSE-Q Expert Information

Table 3 HSE-Q Expert Information

Name Surname	
OHS Certificate Class	
OHS Certificate Date	
OHS Certificate No	

4.1.4 Occupational Physician Information

Table 4 Occupational Physician Information

Name Surname	
Certificate Date	
Certificate No	

4.1.5 Purpose of Emergency Management

This Plan is developed in order to manage emergency situations caused by any natural disaster, planned attack (terrorist attack, sabotage etc.) or any other unexpected incidents (system collapse, fire, failure in communication lines etc.), to minimize negative effects caused by personnel and customer loss and disasters.

The purpose of this document is to make related people understand the instructions to be followed clearly in case of an incident and to overcome emergency situations with minimum damage.

4.1.6 Scope of Emergency Management

This EPRP covers temporary or permanent personnel working in the turbines, buildings and areas of Kandira WPP. Temporary and permanent personnel includes subcontractors, visitors and interns, customers and plant, material, and equipment belonging to workplace.

4.1.7 Emergency Management Standard

EPRP is prepared in accordance with the "Occupational Health and Safety Law" No:6331 and "Regulation on Emergency Situations at Workplace" as well as IFC PSs, AIIB ESSs and general and sector-specific EHS guidelines.

4.1.8 Definitions of Emergency Management

Incident: A situation that can be defined as or may lead to business interruption, loss, emergency or crisis.

Emergency: Unforeseen crisis situation which emerged suddenly and requires urgent emergency action.

Disaster: An event that may cause long-term interruption in activities or systems and caused by human, nature or other factors.

Abnormal Situation: Situation that interrupts the main activities of the Kandira WPP.

Department: Common name used to define Unit, Region and Branch.

4.1.9 Emergency Contact Information

Table 5. Emergency Phone Numbers

Ambulance	112
Fire Department	110
Police	155
Forest Fire	177
Poison Emergency	114
Gendarmerie	156

Table 6 Closest Hospital Information

Closest Hospital Name	
Address	

Table 7 Closest Police Station Information

Closest Police Station Name	
Address	

4.2 Emergency Management

4.2.1 Basic Principles of Emergency Management

Definition

A crisis is any non-standard situation that requires taking urgent strategic and institutional decisions. Potential risks and dangers are significant and emerge in time.

Principles

Delegating single decision maker

- During a crisis situation, quick, brave and clear decisions should be made.
- Sometimes it is needed to make decisions that will not satisfy all the activities of Saganak.
- Consequently, only one personnel should be responsible for making decisions in Saganak.

Collecting information in a single source and identifying missing information

- All available information should be examined and analyzed before making a decision.
- For collecting missing information, all necessary facilities should be used.

Checking Information

- Confirmed, verifiable information with certain date is essential.
- To keep crisis under control, crisis management should also be kept confidential.

Monitoring and forecasting of the development of the situation

- To become ready and manage the event by asking, "What is the worst thing that can happen?" question.

Time Management

- Importance of a crisis management is the requirement of using appropriate management methods against rapid development of events.
- It is needed to make decisions immediately and to implement corrective measures rapidly by using available information and resources according to previous drills, notices and written procedures.

Strict adherence to management procedures, communication and privacy guidelines

- Individual initiatives could be unsafe in crisis situations.
- Confidential information could be spread and could cause panic. Therefore, communication line should stick to procedures.

Priority should be given to crisis communication management

- In case of a crisis, misinformation or uncontrolled spread of information might lead panic.
- In such cases, the best precaution is informing employees through necessary communication ways with enough details which will not cause immediate panic but encourage employees to take actions swiftly with common sense.

Complete identification of the issue and consequences regarding the company

- Emergencies might cause negative effects on the institution on various subjects like economic, legal, health, social and political etc.
- All options should be evaluated and consequences should be taken into account while making decisions.

Building a dedicated team

- The expertise of the institution must be used to analyze the situation and to make decision.
- In such situations, managing the crisis requires effective execution of emergency procedures by authorities and swift response by employees.

4.2.2 Emergency Management

In order to make a better foresight and implement better crisis management, it should be ensured that the following rules are followed. These rules are a synthesis of good practices in terms of institutions, processes, and tools.

Identification of an Emergency Preparedness and Response Coordinator (EPRC) by the Construction/Operation Manager is essential. EPRC may be the Construction/Operation Manager himself/herself. EPRC will be responsible for the implementation of crisis management processes when any problems occur and will be the main spokesperson while providing information about the situation.

- Establish a Crisis Desk that automatically collects the essential experts within the framework of the crisis management in the decision-making process (Chairman, Coordinator), the risk assessment process (Communication, Law), the communication process (Spokesperson) or organizational (Secretary).
- Members should be company's employees who need to be informed when there is a crisis and when the crisis desk needs to be assembled.

- The crisis team must have substitute members who can act immediately in the absence of permanent members. These substitute members should also have the technical skills of the permanent members they replace.
- Organize a decision-making team that will be on the task 24/7.
- Prepare a "call flow" (who will call whom?) to be implemented in the event of a crisis in written and develop a call system that will allow crisis team members to be reached and bring them together in less than three hours.
- According to crisis type and in case of a crisis establish a target list of personnel (within and outside the company) who need to be contacted and keep this list up to date (with all the information: surname, name, telephone number, fax number and address).
- A list containing personal addresses, home, work and mobile numbers, fax numbers, business and personal e-mail addresses of any expert who is likely to participate in the crisis management and members of the Emergency Preparedness and Response Team (EPRT) (experts from within and outside the company) should be prepared.
- Organize crisis management rooms that are isolated, located in a quiet place, dedicated only to this work, fully equipped, and having sufficient space and accessed easily. If the main building is occupied or in a dangerous state, it is necessary to select a different place outside the company.
- Inform those who need to provide in-company services, especially central office and reception, as well as those who provide catering, transportation and any other services.
- During the process implementation, ensure that there is a 24-hour continuous double security system for computers, monitoring systems and doors.
- Prepare an operational guidance regarding crisis management for the use of crisis management teams.
- Create crisis scenarios (simulations) and organize drills according to related legislations.
- According to the crisis types, prepare messages for the media together with the crisis communication consultants and the external communication department.

4.2.3 Occupational Accidents Emergency

Preventing Emergency Situations

- Take precautions by performing risk assessments of all the planned work and conditions that might cause danger.
- PPE that will be used in every activity should be distributed to related employee.
- Electrical installation and work should be performed only by qualified personnel.
- All personnel should follow written procedures (e.g. management plans.) and personnel who are not authorized should not engage any task, equipment or material without necessary permits.
- Training on occupational accidents, prevention of occupational accidents and other occupational health and safety subjects should be carried out.

First Aid Response

- According to related legislations, First Aid Response Team should be assigned and trained.
- Only first aid response team, occupational physicians or paramedics could apply first aid.
- Depending on the health status of the victim, Emergency Coordinator contacts necessary health units.
- In case of the transfer of the victim to the hospital, monitoring of health status of the victim is performed by emergency coordinator/ deputy emergency coordinator.

Human Resources Department

- Immediately report the incident to law enforcement officers.
- Inform Social Security Institution (SGK) online about the incident within three days.
- Prepare an incident investigation file with the help of HSE-Q Expert that includes:
 - Statement of employment of the personnel involved in the incident,
 - Health Certificate of the personnel that is taken during recruitment, and
 - Payrolls of the last four months, training records, and incident report.

4.3 Criminal Emergencies

4.3.1 Sabotage and Fire Emergency Management

Definition

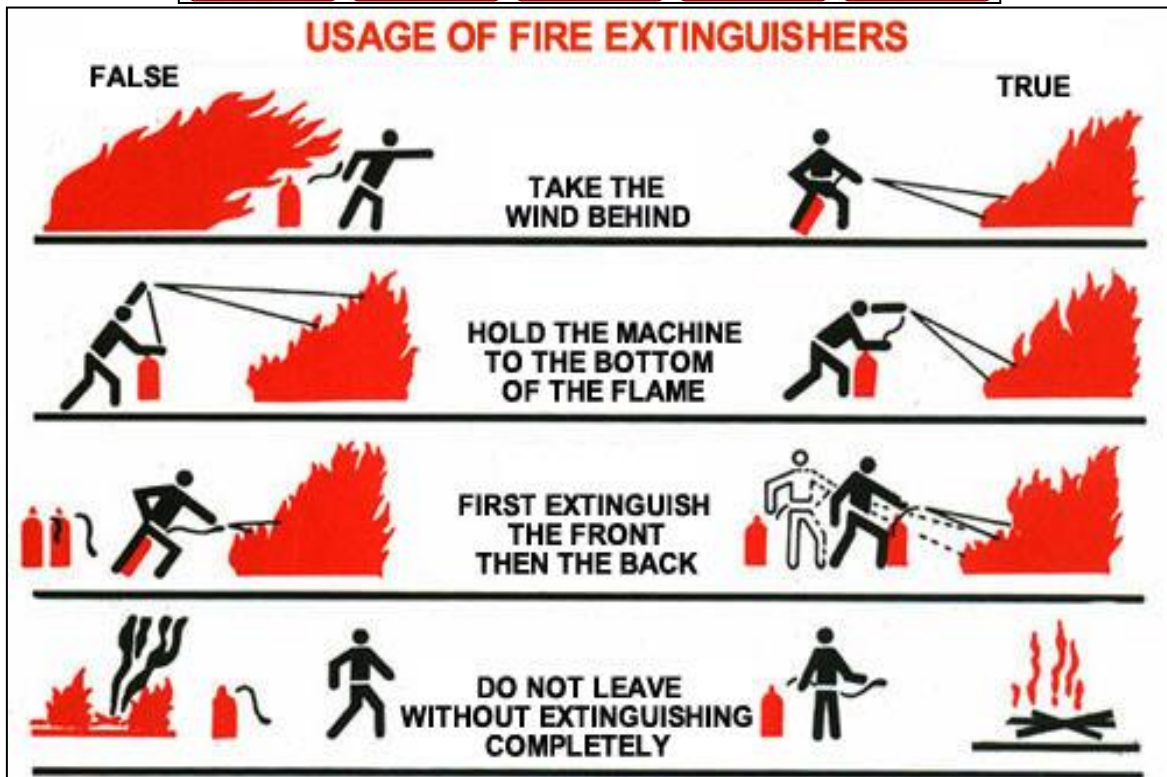
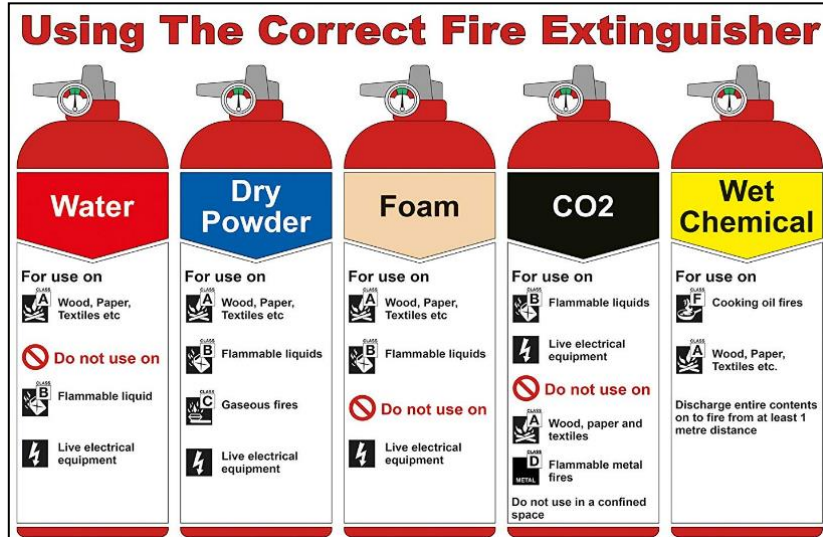
Actions which start fire accidentally or intentionally and end up in damaging humans or goods.

Preventative Measures

- Ensure that people are safe by carefully applying evacuation procedures.
- Ensure that firefighting equipment is intact and ready to use.
- Conduct certified fire extinguisher trainings for emergency team and inform/train all other personnel about basics of fire extinguishing and response.
- Conduct training of the personnel for emergency situations.
- Maintain electrical installation carefully and store flammable products in a separate and secure location.

Emergency Actions

- Activate fire alarm by pressing the fire button or by informing the central security.
- Use the fire extinguishers and establish the first response to fire only if trained.
- Personnel who witness a fire must contact Fire Fighting Team and report it to HSE-Q Expert immediately.
 - Inform the Fire Fighting Team
 - Turn the ventilation off and close windows if it is possible.
 - Each member of the team must take a fire extinguisher and go to the incident area if it is early state of the fire. If it is not and flames are not able to be controlled by extinguishers, the area must be evacuated immediately.
 - The evacuation team should be ready to evacuate employees.
 - If the fire becomes worse, the central security calls the fire department; the firefighting team must meet and direct the fire department.
- If the fire cannot be intervened without emergency services, ventilation should be turned off and all of the employees must stay away from fire.
- Evacuate the building according to evacuation plans.
- Inform the Project management and security.
- In case of a heavy smoke cloud, leave the building by crawling on the floor; as clean air stays close to the ground.



Emergency Management

- Inform the Construction/Operation Manager.
- Depending on the severity of incident, help workplace to organize urgent response.
- Call the reinforcement security teams to prevent destructive incidents.

4.3.2 Bomb Call Emergency Management

Definition

Bomb call is a written or oral information indicating that there is a bomb in or perimeter of the Project area.

Preventative Measures

- Measures should be taken before are:
 - Prepare an evacuation plan that has at least two alternative routes.
 - List places that are most likely under threat.
 - Keep a copy of the current building plans at each of building.
 - Keep the necessary equipment for search crew.
 - Do not allow cars to park adjacent to the plant.
 - Establish a CCTV system to monitor all the building entries.
- As bomb threat comes over the phone
 - Listen to the caller without interrupting and write down what you are told.
 - Keep the caller on the line as long as possible and record the call if there is a chance.
 - Inform the Project management immediately. Keep this information confidential.

Emergency Actions

- Warn the top management, security and HSE-Q Expert and evaluate the degree of severity of the threat together.
- Inform the police and/or gendarmerie and security service.
- Become ready to evacuate the building in every situation.
- In case of a detection of an explosive or a suspicious device, write down its exact location and call the police. Set a safety area with a radius of 100 m from the detection, and do not allow anyone in. Evacuate the building, and open all the doors and windows to decrease the explosion effect.
- Do not enter the building until the police finish the search. If nothing was found, register a complaint.

Emergency Management

- Inform the Project management as the incident is severe.
- Depending on the severity of the incident, help Project personnel to organize urgent response and inform the Emergency Response Teams.

4.3.3 Workplace Violence Emergency Management

Definition

Workplace violence is an act of aggression, physical assault or threatening behavior that occurs at a workplace and causes physical and psychological harm to contractors or personnel.

Preventative Measures

- Keep lists including photographs and basic medical information of all personnel.
- Contact the local police/gendarmerie officers as a measure.
- Form procedures to manage medical emergency at workplace.
- Inform the employees about reporting all threat and violence actions that are being witnessed or being victim to their hierarchies.
- Ensure that the former employees, service providers or consultants return his/her identification badge after the termination/end of contractual relationship.
- Learn national legislation related to entering workplace without permit and threat issues.

Emergency Actions

- In case of a threat, detect the severity of the situation and its truthfulness.
- If the threat is severe and a violent incident has occurred and if the person of interest has been detected and is at the workplace, keep the person away. If it is not possible, call the police.
- Identify victims (name surname, duty, address, medical information, etc.).
- Warn police officers and become ready to cooperate with them.
- Collect information about the incident as much as possible and share this information with security.
- Collect personal information about the perpetrators of threats and violent actions as much as possible.
- If a threat call comes to the plant, note the details as much as possible: time of the call, accent of the caller, gender, background noises and sounds.

Emergency Management

- Inform the Project management.
- Depending on the severity of the incident, help to organize an urgent response and call emergency response teams.
- Take effective safety measures for employees who are threatened or being a victim.

4.3.4 Armed Robbery Emergency Management

Definition

It is the act of armed robbery taking place in a public area for obtaining valuable goods. In such situation, there are three principles that will be applied: Do not resist, accept all the requests and be calm.

Preventative Measures

- Provide the safety of all critical areas as much as possible and check the strict adherence to procedures regularly.
- Keep less money in the site as much as possible.
- Install a CCTV system.
- Train your employees about how to act in case of an attack.
- In situations where response is essential, share plans of the building with police officers.
- Keep recent taken photographs and basic medical information of all employees.

Emergency Actions

- Give information to police officers.
- Observe the criminals as much as possible in order to keep (appearance, communication, behaviors, etc.) details in mind.
- If it is possible, record the incident.
- Prohibit the entries to the area of attack and form a security chamber.
- Fulfill the requests of robbers without resisting or showing effort.
- Inform the Construction/Operation Manager.

Emergency Management

- Coordinate the actions of different parties that respond to the incident.
- Share communication with police/gendarmerie officers.
- Inform the Project management.

4.3.5 Seizure/Hostage Taking Emergency Management

Definition

- It is the way of obtaining something or someone with seizure, threat, or by frightening.

There are three principles to be implemented in case of seizure and these are:

- Do not resist.
- Fulfill the requests as long as the hostages are not released.
- Keep calm.

Preventative Measures

- Make sure that all the procedures within the Project, especially ones that are related to money flow, business trips, and material transfer, are followed. Make the teams sensitive against this type of risks and avoid taking actions.
- Train employees on procedures and safety principles regularly.
- Prohibit employees from remaining late alone at the workplace and coming to the office at weekends while the workplace is closed.
- Call the police if the caller speaks absurd and inconsistent.

Emergency Actions

- In case of receiving a call from hostage takers about one of the employees who is taken hostage, and release against the ransom money:
 - Keep calm as much as possible; note the time of the call and keep the caller on the line as long as possible. Indicate your request for cooperation. Record all the visual and verbal conversations.
 - Ask hostage taker for showing a proof about taking your employee as a hostage and make sure if the employee is alive or not. Ask for talking to the hostage in order to assess their physiological and physical situation.
 - Note conversations; especially note the gender of the caller, main characteristics of their voice, and all words they are using, background noises and other details.
- In compliance with procedures within plant, call the security and safety forces. Warn the Project management, Construction/Operation Manager, and HSE-Q Expert confidentially.
- In such cases hostages should be the top priority. Accept the requests of hostage taker. Ensure that hostage taker always contact with same person. Ensure the family of the hostage is being cared. Introduce emergency response teams to security units. Contact with the security services and evacuate the personnel if it is necessary.

Emergency Management

- Contact security forces and ensure a good coordination between security forces and judicial authorities.
- Make all security responsible individuals take action regarding this issue.
- Cooperate with communication staff and ensure this issue being kept confidential.
- Meet the demands of hostage taker by making cooperation with them.
- After that, follow the judicial outcome of the incident.

4.4 Natural Disaster Emergencies

4.4.1 Earthquake Emergency Management

Definition

Earthquake is shaking of the earth by creating shock waves and caused by the shifting of the underground structure beneath the earth's surface and results in severe damage to buildings. It may cause many people to be injured and die. Earthquakes cannot be foreseen and prevented. When an earthquake occurs, being ready to take action is essential.

Kandira WPP's turbines are all equipped with an over vibration sensors which will automatically shut down the turbine in the event of a severe earthquake.

Preventative Measures

- Regularly check the emergency equipment and first aid kits and make sure they are intact and ready to use.
- Consult the authorities for receiving information, formal procedures and emergency response plans related with emergency services. Participate in simulations and practices regulated by local authorities.
- Prepare an evacuation plan that has least two different routes.
- Store bulky, fragile, flammable or toxic materials separated from each other and according to procedures in MSDSs
- Fix shelves, closets and drawers to the walls or ground.
- Make sure that all personnel know how and when to shut down water, gas and electric lines.

Emergency Actions

- Find a safe place and protect your head with your arms. If you are travelling with a car, stop the car and stay inside. Do not stop on a bridge, at an underpass, or in a tunnel, and keep away from buildings at the side of the road.
- Keep calm and preserve your own safety before considering others.
- When the initial shaking stops, contact Emergency Response Coordinator to confirm your location and wellbeing.
- If you are up-tower, remain in place and take cover.
- When earthquake ends, evacuate the building and calling the emergency services immediately.
- After evacuating buildings, gather persons and count them.
- After everybody is out, stop the turbines.
- After the earthquake, making visual inspection of the structure. Related institutions should be informed about findings obtained from inspections and observations made.
- Help people trapped under debris.
- As long as authorities communicate the opposite, do not enter the buildings that are damaged by the earthquake.
- Do not make a fire under any circumstances.
- If it is possible to enter the building, clean the hazardous solvents that may be scattered around; if you notice gas or chemical substance odor leaving the building, evacuate the area immediately and inform the emergency services.
- Form a safety perimeter around the building and detect damages quickly.
- Check for gas leaks. If you hear gas leak sound or smell gas, open the windows and leave the building. If it is possible, close the main gas inlet valve and call expert services.
- Check for damage in electric wiring. If you realize fire, worn cables or burning smell, call the electricians working for the Project and request them to turn off the electricity from main breaker.

- Check for damaged water or sewer pipes. If you suspect a damaged pipe, do not use the bathroom/toilet and taps.
- If the plant needs to be closed temporarily, keep all valuables (official documents, hard disc etc.) in a safe place. Activate the alarm and place a board indicating the temporary closure of the plant.

4.4.2 Flood Emergency Management

Definition

Water flood incident that cover the lands in the vicinity. Heavy rainfalls, melted snow or river flood may cause the flood.

Preventative Measures

At low risk periods

- Learn from local authorities whether your building is located in a region that remains under flood level or not.
- Regularly check emergency equipment and first aid kits and make sure they are intact and ready to use.
- Prepare an evacuation plan having at least two alternative routes.

In Case of Flood Warning

- Move valuable stuff and equipment and also toxic products to upstairs.
- After an official instruction, shut down all the electric and gas lines and become ready for evacuating the building.

Emergency Actions

During Flood

- Contact Emergency Response Coordinator using emergency channel for help and provide them with turbine number or the nearest turbine, service or village road.
- When the decision is made to evacuate, ensure that site personnel leaves the site and goes to a higher ground.
- Gather persons and count them. When everybody is out, stop the turbines.
- Move to a higher ground if you are on outdoors. If you are driving a car, turn back in case of coming to a flood area; if the car stalls, abandon the car and climb to a higher ground.
- Inform local emergency teams and management.

After Flood

- Do not try to enter a flooded area, wear rubber boats in order to prevent electric shock.
- Call emergency services immediately and form a safety perimeter around the damaged area. Taking photographs of the damage for insurance.
- Inform the Construction/Operation Manager, Emergency Response Coordinator and HSE-Q Expert.
- Organize the evacuation of the plant according to the anticipated plans.
- Detect damages quickly:
 - Check for gas leaks. If you realize gas odor open the windows and leave the building.
 - If possible, close main gas inlet valve and call expert services.

- Check for damage in electric wiring. If you realize fire, worn cables or burning smell, call the electricians working for the Project and request them to turn off the electricity from main breaker.
- Check for damaged water or sewer pipes. If you suspect a damaged pipe, do not use the bathroom/toilet and taps.
- In order to minimize health risks, clean the installation which remain under flood as soon as possible and be careful about the fire risks (damaged gas pipes, electric circuits remained under water, flammable or explosive products).

4.4.3 Storm and Hurricane Emergency Management

Definition

Storm is an atmospheric disorder caused by strong wind (over 55 km/h) accompanied by rain, snow, or other types of precipitation.

Preventative Measures

- Prepare an evacuation plan having at least two alternative routes and make drills that all of the employees have participated (at least one time in a year).
- Regularly check the emergency equipment and first aid kits and make sure they are intact and ready to use.
- Train groups of personnel in accordance with the training on issues of closed and evacuation areas.
- Inform teams about measures that should be taken in such situations and ensure the implementation of these measures accurately and properly.
- If a storm prediction is made, follow the weather forecast and official instructions.
- Identify best places to be protected from the storm. (Basement floor, rooms found in middle section, corridors etc.)
- During rainy season, ensure that all vehicle are at least 50% fueled at all times.
- As the wind speed continues to increase, the power generated by the turbine remains constant until it eventually hits a cut-out speed (defined by the manufacturer). After hitting a cut-out speed, the turbines will shut themselves down and blades will stop spinning to prevent unnecessary strain on the rotor and risks on employees and community.

Emergency Actions

During Storm

- Organize the closure of the building you are inside: Close all openings of the building and protect all of the stuff from falling.
- Protect your personnel by keeping them away from open areas, window and doors; gather them at safe places and not leave until the storm calms down.
- Avoid using of phone, and listen to radio for following the instructions.
- Become ready for loss of utilities for up to 72 hours, if no evacuation order issued.

After Storm

- If you are evacuated, do not enter to the site unless notified by Project management.
- During the storm, people taking shelter in the Project site should stay in a safe place as long as authorities do not communicate the opposite.
- Form a safety perimeter around the plant.
- Inform the manager.
- If there are people exposed to storm, provide first aid to them and inform emergency services.

- Check the building for any collapse risk and take photographs of the damage
- Detect damages quickly:
 - Check for gas leaks. In case of hearing gas leak sound or odorous gas, open the windows and leave the building. If it is possible, close main gas inlet valve and call expert services
 - Check for damage in electric wiring. If you realize fire, worn cables or burning smell, call the electricians working for the Project and request them to turn off the electricity from main breaker.
 - Check for damaged water or sewer pipes. If you suspect a damaged pipe, do not use the bathroom/toilet and taps.

4.4.4 Landslide Emergency Management

Definition

It is the incident of sliding of soil or rock mass downstream. It is generally caused by heavy rainfalls or earthquakes. It can cause structure collapse.

Preventative Measures

If the building(s) is/are located in an area having high risk of landslide

- Construct retaining walls, by-pass mechanisms, and channels for ensuring sludge flow around the building.
- Prepare an evacuation plan having at least two alternative routes.
- Regularly check the emergency equipment and first aid kits and making sure they are intact and ready to use.

Emergency Actions

During Landslide

- Stay in the building and take shelter under resistant furniture. If you are outdoors; climb to a higher ground.

After Landslide

- Call emergency services and form a safety perimeter.
- Listen to the news in order to learn developments and to take instructions and official announcements related with the incident.
- Inform Construction/Operation Manager, Emergency Response Coordinator, and HSE-Q Expert.
- Organize the evacuation of the site according to emergency evacuation plans.
- Help the victims affected by the disaster, however do not try to move the victims that are seriously injured. Call emergency services.
- If you are indoors; stay away from the stuff which are damaged and have a risk of falling. Form safety perimeter around the high risk areas and take photographs of the damage. Detect damages quickly:
 - Check for gas leaks. If you hear gas leak sound or odor, open the windows and leave the building.
 - If it is possible, close main gas inlet valve and call expert services
 - Check for damage in electric wiring. If you realize fire, worn cables or burning smell, call the electricians working for the Project and request them to turn off the electricity from main breaker.
 - Check for damaged water or sewer pipes. If you suspect a damaged pipe, do not use the bathroom/toilet and taps.

Emergency Management

- Call the Construction/Operation Manager, Emergency Response Coordinator, and HSE-Q Expert.
- Depending on the magnitude of disaster, help to organize emergency response.

4.4.5 Severe Weather Conditions Emergency Management

Definition

Exposing to extreme hot and cold is a threat for the human body. Main risks formed during a hot wave are; dehydration, triggering chronic illness or heat stroke. Risks formed during a cold wave are: hypothermia and freezing.

Preventative Measures

- Follow the weather forecasts in order to become ready in high-risk periods. Make insulation of your buildings and set up back up fans, air conditioner heating appliances at places. During hot and cold waves avoid physical actions as far as possible.
- Regularly check emergency equipment and first aid kits and make sure they are intact and ready to use.
- If the weather is very cold, do not use phones except for emergency situations and avoid travelling by car.
- During a hot wave, ensure water and energy saving in plant; distribute drinking water to personnel (at least 2L/day.personnel).

Emergency Actions

During a heat wave

- When an employee shows symptoms, all the activities should be stopped and employee should rest in a cool place. Help this person to drink water, gently massage in order to get relief from spasms. Call HSE-Q Expert immediately. If necessary, HSE-Q Expert should inform medical services.
- Learn to recognize the signs of heat stroke: hot skin, headache and lack of sweating despite heat.
- If dizziness and laziness are observed; heat stroke can be fatal. In this case call emergency services immediately and make person lay down to a cool place that you can sprinkle water over them.
- Learn to recognize the signs of tiredness in hot weather: abnormal sweat; cold, moist and pale skin.
- Nausea and loss of conscious can also be observed. Lay down the person to a cool place. In case of vomiting call medical services immediately.

After a cold wave

- If you have closed circuit heating mechanism, add anti-freeze substances to water and open one of the taps in order to prevent any cracks on pipes. Clean snow accumulated on the roof of the building in order to prevent collapse risk. In case of forming skin lesions depending on the cold, move person to a hot place and call a doctor.
- Learn to recognize the signs of hypothermia (decrease of body temperature): Person feels cold and ache, feels drowsiness, has no ability to move and experience difficulty while speaking. Hypothermia is a severe condition and needs medical treatment.

- Cover person with blanket and give something to drink and eat while waiting for doctor to arrive.

4.5 Industrial Emergencies

4.5.1 Explosion Emergency Management

Definition

A large-scale, rapid, or spectacular expansion or bursting out or forth. Explosion may have various effects on human: Trauma takes place in the lack of air (rupture in eardrum, internal trauma, especially in lungs), fly out of stuff and debris, collapse of structures, burns etc.

Preventative Measures

- Prepare evacuation plans in plant having at least two different routes.
- Fix bulk, fragile, explosive products and products containing toxic substances to a place that is close to the ground;
- Fix all supports (shelves, transporters, ceiling lamps) found above the ground.
- Fix all the damaged electric cables and gas pipes having gas leaks when the damage is indicated.

Emergency Actions

- Organize the evacuation of building according to foreseen plans and call emergency response coordinator.
- Gather persons and count them.
- Inform your manager
- Detect risky areas (collapse etc.), and perform initial assessments, and inform the authorities. Form safety perimeter around the risky regions.
- Help the injured and request help from the medical team for intervention. All people in the explosion area shall be kept under observation.
- Detect damages and form an incident report quickly.
 - Check for gas leaks. If you hear gas leak sound or odor, open the windows and leave the building.
 - If it is possible, close main gas inlet valve and call expert services
 - Check for damage in electric wiring. If you realize fire, worn cables or burning smell, call the electricians working for the Project and request them to turn off the electricity from main breaker.
 - Check for damaged water or sewer pipes. If you suspect a damaged pipe, do not use the bathroom/toilet and taps.
- Activating alarm and keeping all lights open as far as possible.

Emergency Management

- Inform the Project management
- Depending on the severity of the incident, help to organize emergency response.

4.5.2 Water Pollution Emergency Management

Definition

Water pollution is the pollution of water that causes adverse effects on the health of employees and maybe community. Water pollution might take place due to different sources (chemical, bacteriological, pharmaceutical etc.) and intentional (bio-terrorism, blackmail), accidental or natural ways (water flood, earthquake etc.) after a natural disaster. Most common water pollution factors are E. coli, cryptosporidium parasite, pesticides and heavy metals.

Preventative Measures

- Contact local health authorities in order to learn hazard indications caused by pollution of water resources and official instructions.
- Keep drinking water in closed bottles in stock.
- Designate current threats by considering the high-risk structures found in the vicinity of the site and actions of enemy groups (Terrorist Organizations) that may be poisoning water resources in the region.
- Follow weather forecast closely in order to identify high risk periods (heavy rainfall, thunderstorms-, flood etc.)

Emergency Actions

Observation of suspicious indication

- Call the security service.
- If more than one employee has symptoms of vomiting, cramps or bloody diarrhea after drinking water from the same source, contact the doctor immediately to be examined.
- Until medical information is received, prohibit your employees from drinking tap water.

In case of a pollution warning

- Prohibit everyone in the area from drinking tap water

Emergency Management

- Inform the Project management
- Depending on the severity of the incident, help to organize emergency response.

4.5.3 Leakage/Spill Emergency Management

Definition

It is a state of leakage or direct spillage of chemical substances like diesel fuel, petrol, oil, paint etc. found in plant area.

Preventative Measures

- Contact local health authorities for learning signs of danger and official instructions in case of pollution of water resources.
- Follow weather forecast closely in order to identify high risk periods (heavy rainfall, thunderstorms-, flood etc.)

Emergency Actions

Leakage/spill on road and soil

- Take action within 30 minutes from the occurrence of leakage/spill.
- Stop the leak by identifying the source of leakage.
- Prevent leakage from spreading further, by surrounding it with absorbent booms or sand bags.
- Take the pollutant, absorbents that absorbed pollutants and soil into a leak-proof container and labeled.
- Inform the EPRT about the accident immediately, if the leakage is too large to deal with, EPRT should inform related institutions.
- In accidents caused by machines like overturned trucks, construction machines etc., in order to stop leaks, overturned vehicles should be turned to its normal position as soon as possible.

In case of leakage occurring at water sources/ reaching water sources

- Surround the polluted area with absorbent booms immediately to prevent the spread of leakage with flow. Depending on the flow rate of water source a few layers should be formed with absorbent booms.
- Collect the spill on the water surface with granular absorbents in addition to the absorbent booms.
- Inform the EPRT, if the leakage at water source is quite large. EPRT should also inform related institutions.

4.6 Other Emergencies

4.6.1 Suicide Emergency Management

Definition

Suicide is the act of killing one's own self intentionally.

Preventative Measures

- Provide your employees regular medical check-up including psychological examination; and consider the personal problems that they may be experiencing.
- Ensure accurate and proper management of conflicts in workplace and train your managers in order to make sure they know how to handle conflict situations.
- Prohibit any kinds of weapons at workplace.

Emergency Actions

- Call the police/gendarmerie and emergency services.
- In order to prevent further harm, do not leave any kind of weapons and poison around.
- Isolate the incident site so that public and other employees will not see; provide evacuation as the building is open during the incident.
- Do not touch or move anything at incident site; Police/gendarmerie officers will probably come to the incident site in order to investigate how the incident happened.
- Create a physiological support group for other employees found in building.
- Avoid incident to be heard by the community as much as possible and keep media away from the incident site. There is a high risk of relating suicide of employees to the bad treatment of the company (stress, harassment) by media.

4.6.2 Strike Emergency Management

Definition

Strike, depending on the requests of employees from their employers, is planned together and is the action of a voluntary and collective work stoppage. Strike is a legal right. There are different types of strikes: General (all employee left the job), alternating (all units of the company left job in turn), sit-down strike (employees do not work in spite of being on workplace), slow-down (partly strike, adequate for prevention of company work).

Preventative Measures

Before the strike, in a long-run

- Form an effective informative connection in indoors and outdoors.
- Support strong representatives of unions and ask for mandatory negotiation condition before any strike announcement.
- Determine a different place for management to gather in case of a problem.

During strike

- Ensure a continuous observation.
- Protect and develop dialogues and communication..

Emergency Actions

- Assess the magnitude of the strike (what percentage of employee participated in strike?)
- Indicate requests of employees which participate in strike clearly.
- Ensure dialogues with employee representatives about the list of requests prepared before.
- Inform hierarchies.
- Reorganize the duties of management and examine the ways of ensuring continuity of activities.
- Suspend the logistical flow or cancelling.
- Make a decision about keeping buildings open or not.
- If it is needed, call a notary to make determinations for the legal process.

Emergency Management

- Collect all information about issues that are not agreed upon and control again.
- Analyze the risks of spreading and aggravation of strike.
- Activate internal security teams.
- If it is needed, contact police/gendarmerie officers.

4.7 Emergency Response Teams**Emergency Preparedness and Response Coordinator****Table 8 Emergency Preparedness and Response Coordinator**

Name Surname	Title	Duty Location	Phone	Signature

In cases where it is not possible to reach Emergency Preparedness and Response coordinator, Construction/Operation Manager serves as Emergency Preparedness and Response coordinator.

Table 9 Construction/Operation Manager

Name Surname	Title	Duty Location	Phone	Signature
	Construction/Operation Manager			

4.8 Emergency Preparedness and Response Teams**Table 10 Search, Rescue and Evacuation Teams**

Team Leader				
Name Surname	Title	Duty Location	Phone	Signature

Table 11 Fire Fighting Team

Team Leader				
Name Surname	Title	Duty Location	Phone	Signature

Table 12 First Aid Team

Team Leader				
Name Surname	Title	Duty Location	Phone	Signature

4.9 Emergency Evacuation Map

The emergency evacuation map is given in Annex-1 of the Plan.

4.10 Assembly Points

Assembly points located in the Project site are given in Annex-2 of the Plan.

5. TRAINING

5.1 Management Commitment

Saganak will provide the necessary funds and scheduling time to ensure effective emergency response trainings are provided. This commitment will include paid work time for training and training in the language that the workers understand. Both management and employees will be involved in developing the program. To most effectively carry out their responsibilities, all employees must understand (1) their role in the program, (2) the hazards and potential hazards that need to be prevented or controlled, and (3) the ways to protect themselves and others. Goals will be achieved by:

- Educating everyone on the natural and system consequences of their actions;
- Educating all managers, supervisors, employees, contractors and visitors on their responsibilities related to the Plan;
- Educating all employees and contractors about the emergency preparedness and response measures and actions in their workplace;
- Training all employees and contractors on hazard identification, analysis, reporting and control procedures; and
- Training all employees, contractors and visitors on emergency procedures and practices.

Training program will focus on emergency situation concerns that determine the best way to deal with a particular hazard. When a hazard is identified, it shall be removed entirely. If that is not feasible, workers shall be trained to protect themselves, if necessary, against the remaining hazard.

5.2 Employees

At a minimum, employees must know the general safety and health rules and EPRP of the worksite, specific site hazards and the safe work practices needed to help control exposure, and the individual's role in all types of emergency situations. Saganak will ensure all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.

Saganak will commit available resources to ensure employees receive emergency preparedness and response training as well as health and safety trainings during the circumstances below.

- Whenever a person is hired - general safety orientation including an overview of company environment, health, safety and social management systems, policies, procedures and rules, emergency situations, emergency preparedness measures, emergency response actions, and emergency response teams
- Whenever an employee is given a new job assignment that might trigger emergency situations -during formal classroom training, and again, when the supervisor provides specific task training.
- Whenever new work procedures are begun - during formal classroom training and supervisor on-the-job training.
- Whenever new equipment is installed - if new hazards and emergency risks are introduced.
- Whenever new substances are used - hazard communication program may apply.
- First Aid team will be trained by certified professional and they will be certified at the end of training and final test.
- Emergency teams other than first aid team will be trained by HSE-Q Expert. The Project management might use certified third parties for the training of these teams.

Employees must know they are responsible for complying with EPRP and all other management plans, policies, procedures and rules. They must be very familiar with what to do in case of emergencies.

Each employee and contractor needs to understand that they are not expected to start working a new assignment until they have been properly trained. This also covers assignments regarding the emergency preparedness and response.

5.3 Department Managers

All managers must understand their responsibilities within the plan. This may require classroom training and other forms of communication. Formal classroom training may not be necessary. The subject can be covered periodically as a part of regular management meetings.

Managers will be trained in the following subject areas:

- The elements of the company environment, health, safety and social management systems, policies, procedures and rules, and the positive impact the various processes within the system can have on corporate objectives;
- Their responsibility to communicate the EPRP goals and objectives to their employees;
- Their role that includes making clear assignments of company environment, health, safety and social management systems, policies, procedures and rules responsibilities, providing authority and resources to carry out assigned tasks, and holding subordinate managers and supervisors accountable; and
- Actively requiring compliance with mandatory EPRP policies and rules and encouraging employee involvement in discretionary activities such as making suggestions and participations.

Training will emphasize the importance of managers' visibly showing their commitment to the EPRP. They will be expected to set a good example by scrupulously following all rules themselves.

5.4 Contract Workers

All contractors will receive mandatory emergency preparedness and response training before entering the site to understand what to do in case of an emergency situation. No contractor will be allowed without necessary training, certificates or on-site training, medical report and any other documentation requested by Saganak.

5.5 All Workers

All workers will receive refresher training as necessary to keep them prepared for emergencies and alert them.

5.6 Emergency Response

Saganak will train employees to respond to emergency situations. Every employee at every worksite will understand:

- Emergency telephone numbers and who may use them;
- Emergency exits and how they are marked;
- Evacuation routes; and
- Signals that alert employees to the need to evacuate.

Saganak will practice evacuation drills at least semi-annually, so that every employee has a chance to recognize the signal and evacuate. Supervisors or their alternates will practice counting personnel at evacuation gathering points to ensure that every worker is accounted for. Sites will include procedures to account for visitors, contract employees, and service workers such as cafeteria employees. At sites where weather or earthquake emergencies are reasonable possibilities, additional special instruction and drilling will be given.

6. MONITORING AND REPORTING

In the scope of this Plan, regular monitoring activities will be carried out in order to assess the level of implementation of the mitigation measures identified for the Project for both construction and operation phases.

In this context, visual observations will be done for specific monitoring parameters as defined in Table 13 below.

Table 13 Monitoring Parameters

Project Phase	Monitoring Parameter/ Performance Indicator	Monitoring Station /Location	Monitoring Method	Monitoring Frequency	Responsibility
Construction phase	Hazardous Materials/Chemicals Inventory	Construction sites	Visual observation	Weekly	Contractor
	Spill and Leak forms	Construction sites	Visual observation	Daily	Contractor
	Proper storage of hazardous materials	Construction sites	Visual observation	Weekly	Contractor
	Floors of the chemical and hazardous material storage areas	Construction sites	Visual observation	Weekly	Contractor
	MSDSs of all chemicals listed in the inventory	Construction sites	Documentation	Weekly	Contractor
	Labels of the hazardous materials	Construction sites	Visual observation	Weekly	Contractor
	General housekeeping				
	Conditions of the storage area (top cover, drainage, impermeability of ground, etc.)	Construction site	Visual observation	Weekly	Contractor Project Owner
	Number of grievances received from local communities on community health, safety, and security issues	Construction site	Grievance records	Monthly	Contractor Project Owner
	Records of drills and trainings on emergency preparedness and response	Construction site	Training records	Monthly	Contractor Project Owner
	Meetings with Workers' Representatives to strengthen dialogue	Construction site	Face-to-face meetings Minutes of meetings	Quarterly	Contractor Project Owner
Operation Phase	Number of grievances received from local communities on community health, safety, and security issues	Project site	Grievance records	Monthly	Project Owner
	MSDS forms	Storage sites	Visual observation and site inspections	When new chemicals are purchased	Project Owner
	Records of drills and trainings on emergency preparedness and response	Project site	Monitoring of training records	Every 6 months	Project Owner
	Presence and condition of security fence around site	Project site	Visual observation	Every 6 months	Project Owner
	Presence of condition of security and traffic signs around the project site.	Site access roads	Visual observation	Every 6 months	Project Owner
	Records of injuries, complaints and losses	Project site	Monitoring of records	During operation	Project Owner
	Proper storage of chemicals e.g. discharge valves of chemical and oil storage tanks	Storage sites	Visual observation	Weekly	Project Owner
	Transformers	Transfer areas	Visual observation	When necessary	Project Owner
	MSDS of all chemicals listed in the inventory	Storage sites	Documentation	Weekly	Project Owner

Project Phase	Monitoring Parameter/ Performance Indicator	Monitoring Station /Location	Monitoring Method	Monitoring Frequency	Responsibility
	Labels of the hazardous materials	Storage sites	Visual observation	Weekly	Project Owner
	Number of reported leakages and spills	Project site	Documentation	Monthly	Project Owner
	Number of situations that trigger emergency response	Project site	Documentation	Quarterly	Project Owner

Based on the monitoring results, necessary corrective and preventive actions will be identified and required changes will be reflected to this Plan. Training program will also be updated accordingly. Regular audits and visual inspections shall be conducted in order to ensure all activities are being undertaken according to this Plan.

In a six-monthly basis, the HSE-Q Expert will prepare a summary report on Project's overall ESHS performance including emergency preparedness and response issues. The report will be made available to stakeholders.

7. REVIEW AND UPDATE

Saganak's HSE-Q Expert determines the review and update needs of this Plan. In general, it is expected that this Plan will be reviewed at least once in every three months during the construction period. In the operation phase of the Project, the expected review and update frequency is determined as at least once in a year. However, it should be noted that in case of an emergency, the emergency itself and response to this emergency and its related records/documents will be evaluated by the HSE-Q Expert. Without waiting for the predetermined frequency, HSE-Q Expert will revise and update the Plan right after the emergency situation.

The review and update needs of this Plan might be added to the agenda of periodic meetings. In such case, during these meetings (e.g. periodic OHS meetings, accident/incident investigation meetings, and risk assessment meetings) the possible emergency situations will be evaluated by Saganak, and mainly by the contributions and findings of HSE-Q Expert and Construction/Operation Manager, the review and update needs will be determined.

The review and update process of the Plan is conducted with the cooperation of HSE-Q Expert, Emergency Response Coordinator and Construction/Operation Manager. The contractors' representatives might be involved or requested to be involved to this process.