

CEYHAN PDH-PP PLANT, TURKEY ENVIRONMENTAL AND SOCIAL ACTION PLAN

- Notes: 1. This Environmental and Social Action Plan (ESAP) covers action that are required to be completed before signing of loan documentation as well as post signing.
2. For the purposes of the ESAP, the "Project" shall comprise the PDH-PP Plant and associated facilities. It should be noted that the Terminal is subject to separating lender financing and therefore actions relating to the Terminal will be within a separate ESAP for that project.
3. All deliverables shall be completed in accordance with the Project E&S Obligations (as defined in the loan documentation) to the satisfaction of the Lenders, and with reference to detailed guidance in the Compliance Table of the Project Environmental and Social Due Diligence Report (ESDD). Closure of actions will be dependent on the quality and content of deliverables, to be determined by the Lenders.
4. All actions are ultimately the responsibility of the Borrower (Ceyhan Polipropilen Üretim A.Ş – comprising RNS Ceyhan Petrokimya Endüstriyel Yatırım A.Ş. (51%), CYN Petrokimya Endüstri ve Ticaret A.Ş. (15%) and Sonatrach Petroleum Investment Corporation BV (34%)); however, some delegations are suggested. The Borrower or its assignees shall review and confirm responsibility for each ESAP action.
5. Lenders require sufficient time to review and approve documents following their submission prior to closing actions, particularly those required before Signing and Financial Close.

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
E1	PS1, PS4	Construction Phase Environmental and Social (E&S) Management Systems	<p>a) Develop a Construction phase ESMP in line with the framework ESMP developed for the ESIA and to take into account all other work streams associated with ongoing construction phase actions in this ESAP and findings from the ESDD. The ESMP will be developed in line with requirements of the Good International Industry Practice (GIIP) as set out in the IFC General EHS Guidelines (2007) and the IFC EHS Guidelines for Petroleum-based Polymers Manufacturing (2007) and Large Volume Petroleum-based Organic Chemicals Manufacturing (2007) and will provide oversight and basis for the effective implementations of construction phase management plans. The ESMP shall include:</p> <ul style="list-style-type: none"> • Policies including: E&S, Human Resources, EHSS, Corporate Social Responsibility, Code of Conduct and Drug & Alcohol Policy; • Purpose and scope; • Project summary and key stakeholders; • E&S Standards; • the organisational capacity, competency, roles and responsibilities, including E&S structure and responsibilities in line with ESMS. • Responsibilities and coordination mechanisms between the SPV and the Management Company of the CES Industrial Zone, EPC Contractor and the state authorities. • Meeting, monitoring and reporting requirements to facilitate sharing of Project E&S information and learnings, ensure consistent application of E&S standards, address E&S issues, and provide overarching E&S monitoring and review to government entities, to lenders, to affected communities and non-governmental stakeholders. <p>b) Develop/update construction ESMPs to ensure they are operationalised and include all relevant E&S commitments and are aligned to project standards. The ESMP shall include, but not be limited to, the following policies, plans and procedures (plans can be developed separately or included in overall ESMP):</p> <ul style="list-style-type: none"> • Policies including: E&S, Human Resources, EHSS, Corporate Social Responsibility, Code of Conduct and Drug & Alcohol Policy; • Environmental and Social Monitoring Plan(s), including monitoring locations, frequencies and standard operating procedures; • Human Resources Policies and Management Plan(s); • Stakeholder Engagement Plan; • Emergency Preparedness and Response Plan; • Occupational Health and Safety Plan; • Pandemic Preparedness and Response Plan • Community and Worker's Grievance Mechanisms; • Noise and Vibration Management Plan; • GHG & Energy Efficiency Management Plan; • Waste Management Plan; • Pollution Prevention / Hazardous Materials Management Plan; • Water Quality Management Plan; 	<p>a) Construction phase ESMP developed in accordance with Lender requirements.</p> <p>b) Implementation ready Construction management plans</p>	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			<ul style="list-style-type: none"> • Community Health and Safety Plan; • Security Management Plan; • Terrestrial and Marine Traffic Management Plan; • Biodiversity Management Plan; • Biodiversity Monitoring and Evaluation Programme; • Biodiversity Offset Management Plan (if required); • Camp Management Plan; • Demobilisation plan (including procedures for retrenchment); • Cultural Heritage Management Plan; and • Management of Change Procedure. 			
E2	PS1, PS4	Operations Phase Environmental and Social (E&S) Management Systems	<p>An operations phase ESMP and associated management plans shall be developed that addresses all E&S aspects of the operation (including commissioning) of the Project (including associated facilities). This should include but not be limited to an overarching Health, Safety, Environment and Social (HSES) Policy, identification of risks and impacts, management and monitoring programs, organisational capacity and competency, emergency preparedness and response; stakeholder engagement and monitoring and review. The ESMP should include all relevant Good International Industry Practice (GIIP) as set out in the IFC General EHS Guidelines (2007) and the IFC EHS Guidelines for Petroleum-based Polymers Manufacturing (2007) and Large Volume Petroleum-based Organic Chemicals Manufacturing (2007), and reflect operational aspects of the E&S Governance Manual established for the Project. The ESMP shall include, but not be limited to, the following policies, plans and procedures (plans can be developed separately or included in overall ESMP):</p> <ul style="list-style-type: none"> • Policies including: E&S, Human Resources, EHSS, Corporate Social Responsibility, Code of Conduct and Drug & Alcohol Policy; • Environmental and Social Monitoring Plan(s), including monitoring locations, frequencies and standard operating procedures; • Human Resources Policies and Management Plan(s); • Stakeholder Engagement Plan; • Emergency Preparedness and Response Plan; • Occupational Health and Safety Plan; • Pandemic Preparedness and Response Plan • Community and Worker’s Grievance Mechanisms; • Noise and Vibration Management Plan; • GHG & Energy Efficiency Management Plan; • Waste Management Plan; • Pollution Prevention / Hazardous Materials Management Plan; • Water Quality Management Plan; • Community Health and Safety Plan; • Security Management Plan; • Terrestrial and Marine Traffic Management Plan; • Biodiversity Management Plan; • Biodiversity Monitoring and Evaluation Programme; • Biodiversity Offset Management Plan (if required); • Camp Management Plan; • Cultural Heritage Management Plan; and • Management of Change Procedure. 	Operational phase ESMP and associated management plans developed in accordance with Lender requirements.	Ceyhan Polipropilen Üretim A.Ş.	Post-Financial Close, no later than six (6) months prior to the end of construction.
E3	PS2	Labour and Working Conditions	<p>Develop/ Update the HR Policy and HR documents (as part of the ESMP) to cover the following aspects as required by IFC PS2 and national law:</p> <p>a) Worker’s conditions and terms of employment</p>	a) Construction phase HR Policy and HR documents	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			b) Worker's organizations, labour unions c) Equal treatment of personnel, equal opportunity and non-discrimination, , harassment, and gender-based violence d) Retrenchment e) Child labour f) Forced labour g) Contracted workers and supply chain. h) Worker's grievance mechanism i) Local Labour	b) Operational phase HR Policy and HR documents		b) Post-Financial Close, no later than six (6) months prior to the end of construction.
E4	PS2, PS1	Contractor and Supplier Management	Develop Contractors/Subcontractors Management and Monitoring Plan (as part of the ESMP – see ESAP item E1) for contractors, sub-contractors and primary suppliers. The plan shall reference the relevant Project management plans for detailed procedures and as a minimum should reference the following: <ul style="list-style-type: none"> • HR Policy; • Code of Conduct; • Labour and Working Conditions Management Plan, including: Personnel Selection and Employment Procedure; Worker Grievance Mechanism; • Procurement Procedure; • Supply Chain Management Plan. The plan shall include as a minimum: Project Interfaces and communication channels, training requirements and monitoring aspects including the following: recruitment processes; passport retention; recruitment "fees" of contractors and sub-contractors; and (in the case of primary suppliers) grievance mechanism.	Contractors/Subcontractors Management and Monitoring Plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close
E5	PS1	Risks and Impacts Identification	Develop an integrated E&S Aspects and Impacts Register including a clear reference to source and identification/assessment method used.	Aspects and Impacts Register covering both construction and incorporate into ESMP (see ESAP item E1)	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E6	PS1, PS4, PS5.	Organisation Capacity and Competency	In line with ESAP Item E1 and E2, the Borrower shall assign: <ul style="list-style-type: none"> • a site-based CLO and demonstrate his/hers competence profile, and coverage of GBVH issues as per indication in the ESIA Socio-economic chapter 14 (proposed mitigation measures for influx) and the grievance mechanism section in the SEP, including experience in PS5 resettlement/livelihood restoration activities. • Provide information regarding the timing of assigning Project Director. • A site-based Archaeologist and demonstrate his/hers competence profile 	Candidate's CV for CLO and Archaeologist roles along with timing for Project Director employment	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E7	PS1, PS2	Best Available Technique	a) Re-confirm alignment with BAT requirements and project standards (as defined in the Project Standards Document)/mitigation in design commitments on completion of the detailed design in order to confirm no significant changes or discrepancies have occurred. b) BAT verification report at end of commissioning	a) Updated BAT report incorporating final detailed design information b) BAT verification report at end of commissioning		a) 1 month following completion of detailed design b) prior to end of Commissioning
E8	PS1, PS3	Air Quality	<ul style="list-style-type: none"> • The Construction Phase Air Quality Control and Monitoring Plan is to be updated to include adoption of emission standards for Non-Road Mobile Machinery, inclusion of a monitoring location near to the closest sensitive receptor and inclusion of a figure in dust monitoring reporting clearly showing the monitoring locations. • The Borrower shall update the operational air quality dispersion modelling to match the design of stacks including justification of the selection of the minimum exit velocity to avoid stack tip downwash. The dispersion modelling report should include detailed calculations of the emission rates showing the actual and normalised volumetric flowrates and emission concentrations, confirming the temperature, pressure, water vapour and oxygen concentrations of the actual and normalised emissions. Concentrations should be predicted at identified sensitive receptors and also presented as isopleths of predicted concentrations. The modelling should include impacts of emissions from the flaring unless a justification is provided as to why these are not significant. 	a) Dispersion modelling report reflecting design of the stacks following detailed design. b) Verification report to demonstrate the equipment performs in accordance with emissions performance standards including CEMS. c) Updated Construction Phase Air Quality Control and Monitoring Plan	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Prior to the completion of detailed design c) Prior to end of commissioning

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
E9	PS1	Noise and Vibration	The Borrower shall update the construction phase noise and vibration control and monitoring plan to include the following details: <ul style="list-style-type: none"> Noise limit values as reflected in the updated ESIA Measures to review of the status of structures prior to blasting for the surrounding sensitive receptors to record pre-blasting status of structures. Include noise monitoring at the closest sensitive receptor to the PDH-PP in addition to the current monitoring locations 	Updated Noise and Vibration Control and Monitoring Plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E10	PS1, PS4	Infrastructure and Equipment Design and Safety (Seismic Risk)	The Borrower shall demonstrate that the design and the construction specifications meet International Best Practice (e.g., Eurocode 8 (as a minimum and as relevant EN 1998-4:2006 (Silos, tanks and pipelines), EN 1998-5:2004 (Foundations, retaining structures and geotechnical aspects), EN 1998-6:2005 (Towers, masts and chimneys) or similar) and national regulatory requirements.	a) Design and construction specifications verification b) Engineering audits and/or authorities audit reports / Construction Contractors' completion sign-off.	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to construction b) Prior to commissioning
E11	PS1, EP4	Flood Risk	The Borrower shall complement flood risk assessment to confirm all sources of flooding (alluvial, pluvial, groundwater, sea) had been considered in design. The Borrower shall demonstrate that the drainage design solution includes appropriate allowance for climate change and outfall design and monitoring and is in line with flood risk assessment results.	Appropriate design confirmation statement	Ceyhan Polipropilen Üretim A.Ş.	Prior to construction
E12	PS1	Traffic Management Plan	In line with the requirements of E1, the Borrower is to update the Construction Traffic Management Plan to include details relating to construction phasing of third-party road developments as well as responsibilities for proposed road network expansions and improvements and final access routes.	Updated construction Traffic Management Plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close
E13	PS1, PS4	Unplanned Events / Major Accidents	a) In line with the requirements of the Turkish Major Accidents Directive, identify major accident sources and receptors at risk utilising the HAZOP / HAZID studies. b) Based on results of action a), undertake a detailed assessment in the form of the Quantitative Risk Assessment (QRA) for the project. QRA to be carried out in line with Turkish Major Accidents Directive and SEVESO.	a) Identification of major accident sources and receptors at risk b) QRA c) Updated Emergency Response Plan reflecting additional mitigation requirements required from the QRA.	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Prior to Financial Close c) Prior to Construction
E14	PS1	Stakeholder engagement	a) The SEP shall be updated (and Table 8.1 in particular) to include as a minimum: reference to consultation with NGOs; consultations in a pre-construction phase, particularly with NGOs and communities; FGDs with vulnerable groups and women. Develop Stakeholder Engagement Action Plan (as appendix to the SEP to be then updated regularly) containing more granular details on stakeholders, engagement methods and frequency. SEP to be updated to ensure there is ongoing consultation regarding known cultural heritage features and the project's management of them e.g. ancient waterway. b) Prepare a template for Annual Environmental and Social Monitoring Report in line with requirements set out in the SEP	a) Updated SEP including Stakeholder Engagement Action Plan b) Annual Environmental and Social Monitoring Report	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to signing b) Prior to Financial Close
E15	PS1	External Communications and Grievance Mechanisms	The Borrower shall appoint an NGO/local organization specialised in gender-based violence and harassment in line with the grievance mechanism.	Appointment of NGO/local organisation specialised in gender-based violence and harassment	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close.
E16	PS1	Ongoing Reporting to Affected Communities	In line with ESAP item E1 and E2, develop the Annual Environmental and the Social Monitoring Report template.	Annual Environmental and the Social Monitoring Report template	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close.
E17	PS1	Climate Change Risk	Transition Risk Assessment to be updated to include the following: <ul style="list-style-type: none"> 1. Definition of short-, medium- and long-term time horizons 2. Clear scenario narratives that enable an understanding of the potential risks and their anticipated evolution over the assessment timeframe. 	Updated Transition Risk Assessment	Ceyhan Polipropilen Üretim A.Ş.	Prior to signing

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			<ul style="list-style-type: none"> 3. Clear definition of materiality (what is a material risk) and of the high, medium and low risk categories (is the distinction based on financial thresholds or other, and what are those thresholds?) 4. Incorporation of additional short, medium and long-term time points into the analysis (e.g. 2025, 2030, 2040, 2050), with an analysis of the anticipated magnitude of each risk across them (i.e. evolution of the risk over time) 5. Clear rationale for the choice of risk level with and without the proposed management measures, as informed by the scenario narratives and mitigation measures. 			
E18	PS1, PS3	GHG Emissions (Construction)	a) Develop measures for reduction of GHG emissions on the construction stage (i.e. avoid idle running of construction machinery and vehicles, timely maintenance for machinery, use of machinery with engines in good order) and include them into Construction ESMP; b) Establish a monitoring approach for fuel and electricity used on site during construction in Environmental and Social Monitoring Plan c) Estimate the associated GHG emissions and report them annually in a framework of self-monitoring report	a) Respective measures are developed and included into Construction ESMP b) Monitoring approach is developed and included into Environmental and Social Monitoring Plan c) GHG emissions estimation is provided annually and reported to Lenders in self-monitoring reports	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to construction b) Prior to construction c) in time with an annual self-monitoring report
E19	PS1, PS3 EP4 Annex A	GHG Emissions (Operation)	a) Develop GHG & Energy Efficiency Management Plan (GHG EEMP) including applicable standards, approach to mitigation and respective measures for reduction of GHG emissions (including flaring) during operation (i.e. equipment maintenance, energy efficiency measures), roles and responsibilities; monitoring and control arrangements; Lenders and public reporting provisions. The GHG Management Plan should include requirements for annual reporting of GHG emissions during operation both publicly (where annual emission exceed 100ktCO _{2-eq}) and to lenders (where annual emissions exceed 25ktCO _{2-eq}). Such quantification of GHG emissions shall be in accordance with internationally recognised methodologies and good practice (for example, the GHG Protocol) and include Scope 1 and Scope 2 Emissions. b) Establish key parameters and an approach for monitoring of GHG sources covering direct and fugitive emissions and power (heat, electricity) used for own needs during operation in GHG EEMP and perform monitoring of such parameters c) Provide evidence for renewable power use in respect to project needs d) Estimate the associated GHG emissions and report them annually in a framework of self-monitoring report e) Disclose annual GHG emissions assessment as per EP4 requirements	a) GHG EEMP is developed and contains all necessary information b) Monitoring parameters and procedure is developed and included into GHG EEMP c) Evidence to confirm generation, sells to and use of renewable power by the Company are provided d) GHG emissions assessment is provided regularly to Lenders e) GHG emissions assessment is disclosed as per EP4 requirements	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to commissioning b) Prior to operation and during operation c) Prior to operation and annually d) Annually during operation d) Annually during operation
E20	PS3	Resource Efficiency	a) Undertake a detailed energy efficiency benchmark exercise (e.g. EII benchmark) to better understand the energy efficiency of the PDH-PP against peer facilities. b) Review energy efficiency exercise every two years for PDH-PP. Update mitigation measures in GHG EEMP (see Item E14)	a) Energy Efficiency Benchmark Report b) Updated Energy Efficiency Report and GHG EEMP	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Financial Close b) Bi-annually during operation
E21	PS1	Cumulative Effects	a) For cumulative impacts of the associated terminal facility, the Borrower should confirm the air quality pollutant release rates used in the assessment and whether there would be any emissions associated with shipping. b) Confirm whether a masterplan/preliminary design information is available for the wider CES industrial zone that will allow further consideration of cumulative impacts beyond just the CPIR Port that is currently included. c) Scope a Cumulative Impact and Associated Facilities Management Plan d) Produce a Cumulative Impact and Associated Facilities Management Plan (CIMP) that describes practical and realistic actions/methods for its approach to third party liaison in this regard. Such a plan should be developed as part of the construction phase ESMP (see E2 above and Compliance Table CT) and should be a living document to reflect the differing development programmes for activities under the control of the third parties and any changes to those projects.	a) Updated cumulative impact assessment to include additional details regarding the assessment of cumulative impacts from the associated terminal facility and shipping, as appropriate. b) Confirmation of masterplan/preliminary design information for wider CES Industrial Zone c) Scope a Cumulative Impact Management Plan d) Develop full draft of Cumulative impacts management plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E22	PS1	Emergency Preparedness and Response	a) The Emergency Preparedness and Response Plan is missing information on Evacuation Plans, Safety Assembly Points, Emergency Response Team Members and Nearest Hospital and Fire Brigade (the information is marked as TBA). Given that early works have already started at the site, it is important that these the EPRP is updated to include these, following consultation with the local authorities/communities.	a) Updated EPRP b) Record of stakeholder engagement activities undertaken	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Post-Financial Close, no later than six (6) months prior to the end of construction

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			EPRP is to be updated in line with ESAP E1 and the outputs of ESAP E10 and E13. b) The Borrower shall disclose the EPRP as part of the stakeholder engagement activities.			
E23	PS1, PS2	Demobilisation. Decommissioning	a) Develop a Demobilisation Plan for construction as part of the ESMP. The Demobilization Plan to include procedures for retrenchment and reference the Retrenchment Plan (see ESAP item 25). b) Develop an outline decommissioning strategy (including consideration of cost budgeting) and the more detailed plan developed in due course prior to end of operation in line with the strategy.	a) Demobilisation Plan b) Outline Decommissioning Strategy c) Detailed Decommissioning Strategy	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) 6 months after Operation c) 6 months prior to end of Operations/Decommissioning
E24		Permitting Requirement	a) The Borrower shall develop and maintain an up-to-date register of all permits, licenses and approvals for the Project, throughout the construction and operation phases. The permit register should clearly show the permits in place, expiry dates, those that are in the application process (including permits to be obtained for the operation phase). b) The Borrower shall engage with the related authorities to officially confirm the validity of the EIA Positive Decisions for the current Project boundaries given in the ESIA.	a) Up-to-date Permits Register for construction and operation phases b) Record of engagement with relevant authorities	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E25	PS2	Labour and Working Conditions	Update construction camp management plan to include details around COVID-19 protocol and gender balance	Updated Camp Management plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E26	PS2	Non-Discrimination and Equal Opportunity, Forced and Child Labour	HR Policy and HR Documents to explicitly state the company's commitment towards non-discrimination, harassment and gender-based violence. The Borrower shall include prohibitions of forced labour in Contractors contractual documents and provide relevant training to Contractors in line with Contractors/Subcontractors Management and Monitoring Plan.	a) Development of HR Policy b) Evidence of inclusion on contractors contractual documentation	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Prior to Financial Close
E27	PS2	Workers Grievance Mechanism	Workers Grievance Mechanism shall be developed in line with IFCs PSs and shall be included within the Labour Management Procedure or other relevant HR document. The Workers Grievance Mechanism shall be implemented for Construction and Operation workers (including Contractor's and Subcontractor's workers).	Workers Grievance Mechanism and relevant HR documents and management plans	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E28	PS2	Workers Engaged by Third Parties and Supply Chain	The Borrower shall develop Procurement Procedure as per ESIA ESMP. The procedure shall include issues related to contractor and supply chain.	a) Construction phase Procurement Procedure b) Operation phase Procurement Procedure	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Post-Financial Close, no later than six (6) months prior to the end of construction
E29	PS3	Sustainable Water Management	a) A detailed water balance study should be prepared for both construction and operation. This should be incorporated into a Water Management Plan held by the company that should cover sustainable water management throughout the project lifecycle, including detailed water balance and monitoring during construction, commissioning (including hydro-testing) and operation. The water balance study should include a justification for the selection of the recirculating type cooling water system in consideration of the large makeup water requirements. b) The Borrower is to review the feasibility study developed by DSI to ensure that it has adequately considered future climate change scenarios. The Borrower is also to consider alternative water sources in the event that water from Aslantas Dam does not provide adequate flow.	a) Water balance study with results included in an updated Water Management Plan b) Technical note	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close
E30	PS3	Wastewater management	a) Prepare wastewater treatment plant design report, which will include information on monitoring requirements. b) Update WWTP effluent monitoring plan based on wastewater treatment plant design report	a) Operation WWTP design report b) Update to operation phase WWTP Effluence Monitoring Plan	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Financial Close b) Post-Financial Close, no later than six (6) months prior to the end of construction
E31	PS4	Community Health, Safety and Security	A worker induction programme, which will include a series of training on community, health, safety and security issues should be developed and conducted for all workers.	Training Action Plan	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E32	PS4	Community Health, Safety and Security	a) In line with ESAP item E1, update Community, Health, Safety and Security Plan for construction to include mitigation measures included in the Final ESIA (March 2023) in addition to mitigations for physical safety risks to community members at active work sites, control of physical safety risks along the routes used for transport of e.g. hazardous materials, control of communicable diseases that could result from project activities, and mitigation measures with specific considerations of crime and gender-based violence.	a) Updated Community, Health, Safety and Security Management Plan for Construction b) Community, Health, Safety and Security Management Plan for Operation	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Post-Financial Close, no later than six (6) months prior to the end of construction

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			b) In line with ESAP Item E2, develop Community, Health, Safety and Security Plan for operation based on the measures included in the Final ESIA (March 2023)			
E33		Security Personnel	a) Revise the construction Security Management Plan for construction in line with the Final ESIA (March 2023) and the revised CHSS management plan. The SMP to include details on the security contractor including the type, number, responsibilities, and arming of security personnel. b) Develop Security Management Plan for the operation phase of the Project in line with the requirements of IFC's 2017 Good Practice Handbook on Use of Security Forces and the Final ESIA (March 2023) including the Human Rights Risk Assessment and the CHSS management plan. The SMP to include an assessment and evaluation of the potential security risks, for determining the level and types of security arrangements and include details on the security contractor including the type, number, responsibilities, and arming of security personnel.	a) Security Management Plan for construction b) Security Management Plan for operation	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Post-Financial Close, no later than six (6) months prior to the end of construction
E34	PS5	Resettlement Action Plan / Livelihood Restoration Plan	a) A resettlement action plan is to be developed which shall include specific details around the following: <ul style="list-style-type: none"> Provide evidence of discussions taken to avoid / minimize resettlement. This could be done as part of the consultation with the responsible parties. The Project boundaries to be explained by providing a sound justification of the selected area or alternative solutions for the mobilisation area boundaries within the RAP. Detailed plan to demonstrate alignment between RAP/LRP Implementation and construction schedule (including mobilization) Define Project roles & responsibilities within RAP/LRP with regard to land acquisition and resettlement and define responsibilities and coordination interfaces with the Management Company of CPIR/ Government including MoIT/ relevant authorities. b) Community engagement activities as part of RAP implementation will include the following: <ul style="list-style-type: none"> Update Project SEP to include PAPs affected by displacement following the implementation of the RAP. Conduct consultations with displaced persons (including informal users) regarding project alternatives and displacement impacts, status of expropriation, valuation and compensation process, and timing of actual evacuation and relocation according to the RAP/LRP. Develop/update Grievance mechanism as part of the RAP/LRP and disclose as part of early consultations. c) Undertake a Resettlement Completion Audit by an independent third party. The provision for these audits shall be included in the Project ESMP (refer to E1); d) If required, develop a Resettlement Corrective Action Plan which includes a timeline, budget and resource allocation based on the findings of the audit.	a) RAP b) Updated SEP, grievance mechanism including record of engagement with displaced persons c) Resettlement Completion Audits each section. d) Resettlement Corrective Action Plan.	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Within one month of RAP implementation c) No later than twelve (12)months following completion of the land acquisition process or livelihood restoration measures, whichever is later. d) Within sixty (60) days of Resettlement Completion Audit completion.
E35	PS6	Marine Impact Assessment	a) Update the Marine Impact Assessment on the effects of piling and that underwater noise has been suitably modelled for using threshold levels that are appropriate for marine biological receptors. b) Update the Marine Impact Assessment with a suitable evaluation of the potential impacts of ground vibration as a result of onshore blasting activities on neighbouring turtle nesting beaches.	a) Scoping of noise modelling methodology b) Underwater Noise Modelling of piling activities for construction of the associated terminal facility c) Updated Marine Impact Assessment	Ceyhan Polipropilen Üretim A.Ş.	a) Prior to Signing b) Prior to Financial Close c) Prior to Financial Close
E36	PS6	Biodiversity Management Plan	Update the BMP as follows: <ul style="list-style-type: none"> Consolidate the mitigation measures included in Chapter 12 of the ESIA, Annex T and the current iteration of the BMP to ensure all are captured. In doing so, the most stringent measure relating to each potential impact should be captured in the BMP. Provision of evidence that site clearance to date was done in accordance to measures presented in the BMP Inclusion of the AIS Control Plans as sub plans to the BMP. Inclusion of a No Net Loss Strategy to address residual natural habitat losses. This will be an iterative document to be updated as the Project develops and exact losses are better understood. Inclusion of the Threatened Plant Translocation Procedure Appropriate mitigation measures for turtle nests are put in place to ensure any nests that may be present during the construction phase outside of peak nesting periods are not damaged. These 	Updated BMP	Ceyhan Polipropilen Üretim A.Ş.	Prior to Financial Close

ID	Standard	Requirement	Action	Indicator of Completion	Responsibility	Timeframe**
			may include a plan to translocate any detected clutches to a turtle hatchery, rookery or rescue centre.			
E37	PS8	Cultural Heritage	The Borrower shall complete the official notifications of the unregistered archaeological site/traces which have been identified by the cultural heritage experts within the Project site.	Official notification for the identified unregistered archaeological site/traces (archaeological sites/traces stated within the ESIA)	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing
E38	Various	Recommendations from IESC Site Visit in October 2022	<p>The following recommendations are to be undertaken</p> <p>a) A dedicated on site CLO and archaeologist is to be employed (as per ESAP Item E5)</p> <p>b) H&S Inspection & Audit: observation spreadsheet is to be updated to include record of what Recommendations have been taken to close a finding and all findings from site inspections are to be recorded in observation spreadsheet</p> <p>c) Hole in the floor of Kocabey toilet facility to be repaired</p> <p>d) Housekeeping improvements to undertaken around Kocabey site facilities</p> <p>e) Air quality and noise management and monitoring plans to be updated to include an additional monitoring location next to the closest sensitive receptor to the PDH-PP</p> <p>f) Controls such as bunding are to be implemented across the excavated areas of site to manage erosion risks particularly for areas directly adjacent to the marine environment.</p> <p>g) Repairs to be undertaken of the ancient waterway fencing.</p>	<p>a) Candidate CVs</p> <p>b) Updated observation spreadsheet</p> <p>c) Photo evidence of repaired flooring</p> <p>d) Photo evidence of cleared and improved housekeeping at Kocabey site</p> <p>e) Updated noise and air quality monitoring plan in accordance with requirements of ESAP item E1, E8 and E9</p> <p>f) Constructed management controls such as bunding</p> <p>g) Photo evidence e.g. photos of repaired fencing</p>	Ceyhan Polipropilen Üretim A.Ş.	Prior to Signing

** Timescales are typically linked to project events/milestone rather than calendar dates. A variety of project events and milestones are used and, as the ESAP will be a covenanted document under the CTA, their definition will ultimately need to be consistent with relevant terms as yet to be defined in the CTA. In the interim, and for the avoidance of doubt when the ESAP is incorporated into the CTA, we provide the following definitions for the timeline events/milestone used in the above ESAP:

- **Signing:** Signing of loan documentation
- **Financial Close:** First disbursement under the loan agreement.
- **Construction:** Starts at commencement of first major civil engineering works onwards
- **Detailed design:** Assumed to have been completed once the detailed design has been completed by the EPC Contractor and agreed/approved by Borrower and vendor guarantee data received.
- **Pre-commissioning:** Verification of functional operability of any unit/facility within the overall Project to achieve a state of readiness for the Commissioning. This includes hydrostatic testing of vessels and pipes.
- **Commissioning:** Starts at first introduction of feedstock into any unit/facility.
- **Operation:** To be determined based on wording within the CTA.
- **Decommissioning:** Starts at the final cessation of operation/product delivery.