



REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE



TÜRKİYE EMERGENCY ROAD REHABILITATION AND RECONSTRUCTION PROJECT



GENDER ACTION PLAN
CNR-KGM-TERRRP-GAP-001
Final



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Project Location	Hatay-Gaziantep-Adıyaman-Malatya-Elazığ
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ABBREVIATIONS AND ACRONYMS

AIIB	Asian Infrastructure Investment Bank
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CHS	Community Health and Safety
ÇINAR	Çınar Engineering Consultancy Inc.
CLO	Community Liaison Officer
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESEL	Environmental and Social Exclusion List
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
GAP	Gender Action Plan
GBVH	Gender Based Violence and Harassment
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
ILO	International Labor Organization
KGM	General Directorate of Highways
KSGM	The General Directorate of Women's Status
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SuTP	Syrians under Temporary Protection
TAG	Tarsus Adana Gaziantep
The Project	Türkiye Emergency Road Rehabilitation and Reconstruction Project
UN	United Nations
VGs	Vulnerable Groups



1 INTRODUCTION

The Türkiye Emergency Road Rehabilitation and Reconstruction Project (the Project) has been planned to be prepared and implemented by General Directorate of Highways (KGM) under the Ministry of Transport and Infrastructure (MoTI) to ensure efficient execution and compliance with national regulations and Asian Infrastructure Investment Bank (AIIB) policies.

The Project will rehabilitate and reconstruct roads, tunnels, and bridges damaged by the February 2023 earthquakes that occurred in the southeast of Türkiye. The Project activities will be implemented through five (5) subprojects which will entail rehabilitation and enhancement of transportation infrastructure to meet required safety and capacity standards, as well as integration of climate-resilient measures to mitigate and withstand the impacts of seismic events in the future. The subprojects are located within the jurisdictions of the 5th Regional Directorate of Highways (Mersin) and 8th Regional Directorate of Highways (Elazığ).

According to the Asian Infrastructure Investment Bank's (AIIB) Environmental and Social Framework (ESF), The phased approach on environmental and social (E&S) assessment is utilized for the proposed Project given the urgent need of assistance because of the earthquakes. In this context, a contract was signed between 5th Regional Directorate of Highways and Çınar Engineering Consultancy Inc. (ÇINAR) on 14.02.2024 for the preparation of Environmental and Social Documentation in accordance with the AIIB standards and national legislation.

1.1 Project Description

The Main Project summary information is provided in Table 1 and the sub-projects that are classified according to related Regional Directorates are given in Table 2.

Table 1. Project Summary Information

Project Name	Türkiye Emergency Road Rehabilitation and Reconstruction Project
Project Number	P000848
Sector/Subsector	Transport/Roads
Status of Financing	Under Preparation
Objective	To restore connectivity and enable safe and efficient movements of goods and people by rehabilitating essential transportation infrastructure located in the earthquake affected areas of Türkiye
E&S Category	Category B

Table 2. Classification of the Sub-projects

Responsible Regional Directorate	Subproject No.	Subproject Name	Province/District
5 th Regional Directorate (Mersin)	1	TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work	Gaziantep/Nurdağı
	2	Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work	Hatay
	3	Antakya-Samandağ Road (Including Samandağ Crossing) Km: 0+000-26+850 Section Supply Construction Works	Hatay/Samandağ
8 th Regional Directorate (Elazığ)	4	(Malatya-Akçadağ) Junction - Gölbaşı Road (Construction Works of Erkenek Tunnel Damaged in Earthquake and Erkenek Tunnel-Karanlıkdere Section Damaged in Earthquake)	Malatya/Doğanşehir Adıyaman/Gölbaşı



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Responsible Regional Directorate	Subproject No.	Subproject Name	Province/ District
	5	Repair of Technological Bridges Damaged in Earthquake (Tohma, Ađın, Beylerderesi Bridges Earthquake Damage Repair)	Malatya Elazıđ

Province and district information regarding the sub-projects is summarized in Table 2. The main project encompasses Hatay, Gaziantep, Malatya, Elazıđ, and Adıyaman Provinces. A map presenting the locations of all sub-projects is provided in Figure 1.



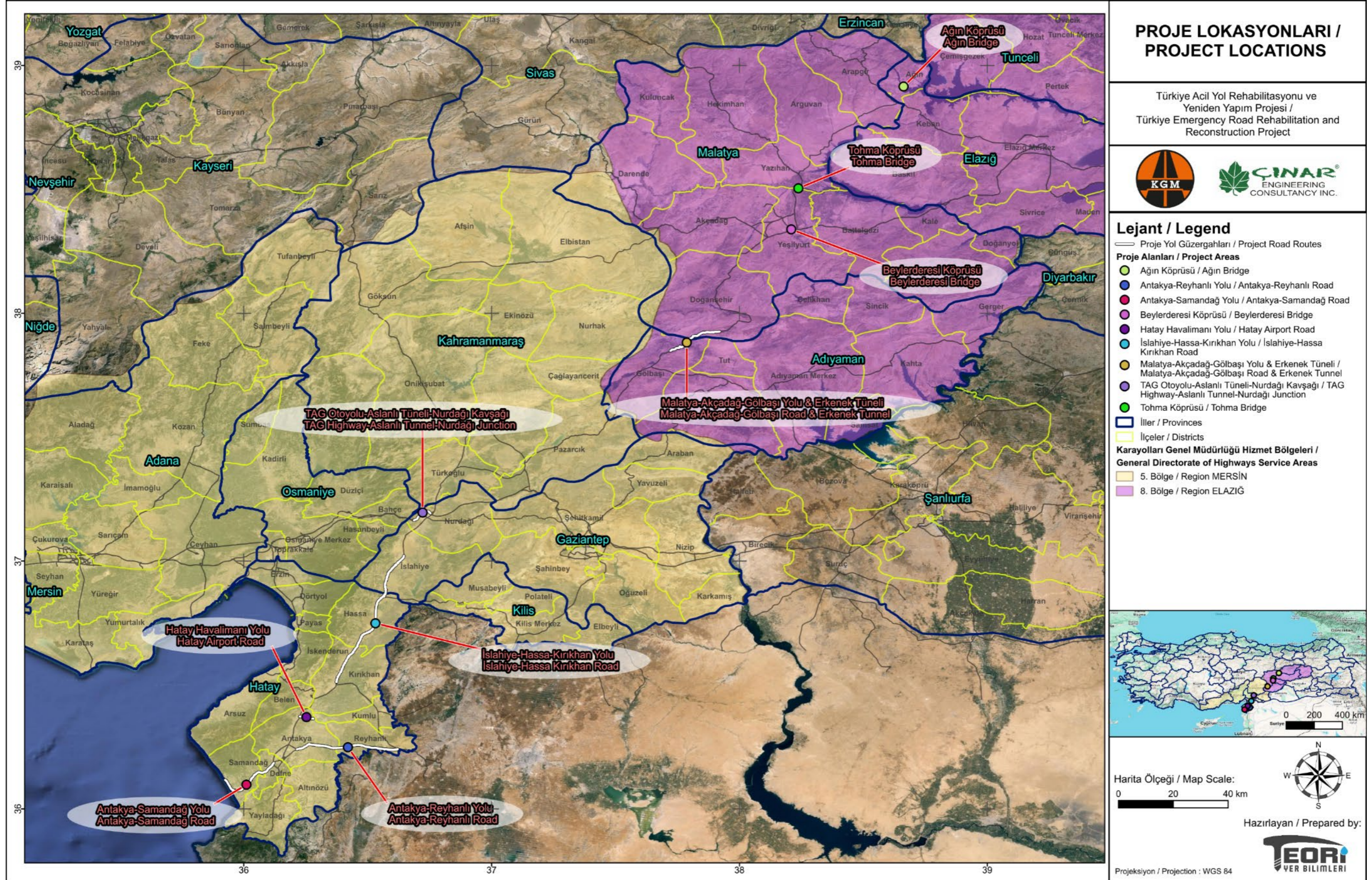


Figure 1. Project Locations Map

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1.2 Scope and Objectives

This Gender Action Plan (GAP), which will ensure the operationalization of recommendations regarding the gender equality approach, has been developed in accordance with National Legislation and AIIB's ESF.

GAP includes specific gender considerations that must be taken into account during the Project activities. It also defines indicators that will help monitor the implementation of these measures and activities.

The main purpose of GAP is to maximize the common benefits of the Project by ensuring the implementation of gender-sensitive activities. In this context, it is aimed to ensure the integration of a consistent gender perspective with the goal of mainstreaming gender equality in line with national and international development goals.

Based on this approach, GAP has been developed to manage and mitigate potential negative risks, as well as promote gender equality opportunities, drivers of change and positive gender dynamics throughout the life cycle of the Project.

The GAP is closely integrated with the Environmental and Social Impact Assessment (ESIA), including the Stakeholder Engagement Plan (SEP) and the Resettlement Plan (RP). It supports the Environmental and Social Management and Monitoring Plan (ESMMP), which includes mitigation measures for the project's impacts and already incorporates gender-related aspects.

Although the implementation responsibility of GAP is defined to KGM, this document is also binding for all contractors (including its sub-contractor), goods and service providers operating within the scope of the Project. This document provides an overall gender assessment, outlining the policy framework and institutional structure on gender equality in national legislation and international regulations, and aims to strengthen gender equality and increase women's participation in the Project. GAP presents the gender action plan that outlines the actions to be taken throughout project implementation.



2 LEGAL FRAMEWORK

2.1 National Legislation

The national regulatory framework includes several laws protecting women's rights. Türkiye has laws in place that prohibit discrimination in employment by gender. A summary of national laws related to the implementation of this GAP is given in Table 3.

Table 3. National Laws Related to the Implementation of GAP

Regulation
Law to Protect Family and Prevent Violence against Woman No. 6284 Official Gazette Date/Number: 20.03.2012/28239 Last Amended on 19.08.2017
Turkish Criminal Code No. 5237 Official Gazette Date/Number: 12.10.2004/25611 Last Amended on 14.07.2021
Law on Equal Opportunities Commission for Woman and Man No. 5840 Official Gazette Date/Number: 24.03.2009/27179 Last Amended on 02.07.2018
Law on Social Assistance and Encouragement of Solidarity No. 3294 Official Gazette Date/Number: 14.06.1986/19134 Last Amended on 02.07.2018
Law on Social Services No. 2828 Official Gazette Date/Number: 27.05.1983/18059 Last Amended on 16.04.2020
Law on Regular Cash Support for Turkish Citizens Who are 65 Years of Age or Older and Poor and Alone No. 2022 Official Gazette Date/Number: 10.07.1976/15642 Last Amended on 11.05.2018

Türkiye ratified the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) in 1986 and lifted the reservations on Articles 15 and 16 in 1999. The Beijing Declaration and Optional Protocol to CEDAW were signed in 1995 and 2002, respectively.

The first institutional framework for gender equality in Türkiye was the 'Advisory Board for Policies with regards to Women' established in 1987 within the State Planning Organization to raise gender awareness in public policies. The General Directorate of Women's Status (Kadının Statüsü Genel Müdürlüğü, KSGM) was established in 1990 to achieve the objectives of CEDAW. Other international commitments include the United Nations Charter, the Human Rights Declaration (1948), and the Convention on the Elimination of All Forms of Gender Discrimination.

A range of policies and strategies have been put in place to establish mechanisms, programs, and plans for gender mainstreaming. The KSGM prepared the National Action Plan for Societal Gender Equality for 2009-2013, which focused on the elimination of gender-based inequality in education, health, poverty and access to the decision-making process. Türkiye's 11th National Development Plan 2019-2023 contains goals and measures to empower women, prevent discrimination against them, and ensure that women have equal access to the rights, opportunities, and facilities available to men.

Other policy documents adopted include the National Strategy and Action Plan on Women's Empowerment (2018-2023), the National Action Plan on Combating Violence and Women (2016-2020) and the National Action Plan on Women's Employment (2016-2018).

In the Twelfth Development Plan of the Republic of Türkiye (2024-2028), policies and measures have been defined to increase women's active participation of women in economic, social, cultural life and decision-making mechanisms at all levels, in the way of strengthening



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the equality of opportunity for men and women on the rights, especially beginning from the local level.

Twelfth Development Plan drew attention to the following targeted policies and measures on the employment and economic participation of women which are also directly related to this GAP¹.

- The practices such as training, internship and on-the-job-training will be continued effectively in order to increase the active participation of women in economic life, by taking into consideration the different labor needs of the provinces.
- The data collected by the institutions will be produced on the basis of attributes such as gender, age, immigration status, disability and geographical location, and analyzes will be carried out based on this.
- Budgeting studies that are sensitive to equal opportunities for men and women will be expanded and integrated into budgeting processes.
- "Temporary special measures" such as quotas and additional supports will be defined and implemented to increase women's participation and representation in education, employment and decision-making mechanisms.
- Work will be carried out for a gradual transition, with the aim of increasing the representation and participation of women, who constitute half of the population, in all decision-making mechanisms, including the public, private sector, politics, and at all levels of management.
- In addition to women's equal participation in economic, social and cultural life, their employment will be increased under conditions where the principle of equal pay for equal work is adopted.
- Programs and projects, including production, innovative technologies, cooperation and psychological empowerment, will be implemented to ensure that female producers and entrepreneurs affected by the earthquakes centered in Kahramanmaraş and Hatay rejoin and hold on to life.
- Violence against women and early and forced marriages will be combated with the principle of zero tolerance, and violence will be prevented, and victims of violence will be empowered.
- Within the scope of combating violence against women, institutional capacity will be developed for the effective provision of protective and preventive services, service standards will be implemented, and systematic, reliable, and comparable data will be collected.

2.2 International Standards

2.2.1 AIIB's Environmental and Social Framework

AIIB is a multilateral financial institution, whose purpose, as set out in its Articles of Agreement (Articles), is to: (a) foster sustainable economic development, create wealth and improve infrastructure connectivity in Asia, by investing in infrastructure and other productive sectors; and (b) promote regional cooperation and partnership in addressing development challenges by working in close collaboration with other multilateral and bilateral development institutions.

The Articles require the AIIB's operations to comply with policies addressing environmental and social impacts, among other policies. The Environmental and Social Framework (ESF) incorporates AIIB's policy addressing environmental and social impacts. The ESF amended in November 2022, replaces the May 2021 ESF and entered into effect on November 22, 2022.

¹ https://www.sbb.gov.tr/wp-content/uploads/2023/12/On-Ikinci-Kalkinma-Plani_2024-2028_11122023.pdf



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The Environmental and Social Policy (ESP) provisions and Environmental and Social Standards (ESSs) are integral parts of this framework, designed to ensure that AIIB-funded projects are environmentally and socially sustainable.

The ESP Vision Statement highlights AIIB's support to its clients to identify potential gender-specific opportunities as well as gender-specific adverse risks and impacts under their Projects and to develop mitigation measures to avoid or reduce such impacts and risks, including, as appropriate, measures to identify and address the risks of gender-based violence (GBV). The Bank also supports its clients' efforts to identify and address the risks of sexual exploitation and abuse (SEA), sexual harassment (SH), including intimidation, in the Projects it supports. In reviewing the social risks and impacts of the Project, it pays special attention to disproportionate gender impacts and the vulnerability of various types of potentially affected people.

The ESP paragraph 21 refers to a sound labor management relationship based on equal opportunity, fair treatment, non-discrimination, freedom of association, right to collective bargaining and access to a workplace grievance redress mechanism. While point 23.2 of the ESP highlights meaningful consultations to be gender sensitive, inclusive, accessible, responsive, and tailored to the needs of vulnerable groups.

The ESP paragraph 47 underlines the necessity to identify and manage GBV risks under the projects. It requires identifying adverse gender-specific risks and impacts, developing mitigation measures to reduce these, and collecting gender-disaggregated data for monitoring and evaluation purposes at an appropriate level of detail. Special emphasis is placed on designing gender-sensitive Grievance Redress Mechanisms to promptly address Project-affected people's concerns and complaints under the Project, including gender-related concerns and complaints related to GBV.

Point 58.5 of the ESP is related to Labor and Working Conditions and highlights the application of the principles of equal opportunity, fair treatment, and non-discrimination with respect to any aspect of the project related employment relationship.

ESS2 Land Acquisition and Involuntary Resettlement requires the identification of gender-differentiated sources of livelihood and the addressing of gender-related risks and differential impacts of Involuntary Resettlement. Paragraph 23 of ESS2 highlights gender considerations in determining and paying compensation and providing other entitlements.

AIIB has integrated robust provisions within its Environmental and Social Framework (ESF) to promote gender equality and inclusion of persons with disabilities. These provisions aim to ensure that AIIB-funded projects prioritize and address the specific needs and concerns of women and individuals with disabilities, fostering greater equity and accessibility in infrastructure development. AIIB prioritizes gender equality and the inclusion of persons with disabilities in its project support, actively assisting clients in identifying gender-specific opportunities and risks while promoting inclusive project designs. The bank also emphasizes transparent and accessible grievance redress mechanisms to promptly address concerns, including those related to gender and GBVH.

2.2.2 Other Standards

In addition to the AIIB ESS the international standards that form the basis for this GAP are listed below.

- Universal Declaration of Human Rights (UDHR)²
- Equator Principles (EPs) IV³

² <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

³ https://equator-principles.com/app/uploads/The-Equator-Principles_EP4_July2020.pdf



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- Key ILO Conventions signed by Türkiye⁴
- No.29: Forced Labor Convention (1930)
- No.87: Freedom of Association and Protection of the Right to Organize Convention (1948)
- No.98: Convention on the Right to Organize and Collective Bargaining (1949)
- No.100: Equal Pay Convention (1951)
- No.105: Convention on the Prohibition of Forced Labor (1957)
- No.111: Discrimination (Employment and Occupation) Convention (1958)
- No.138: Minimum Age Convention (1973)
- No.182: The Worst Forms of Child Labor Convention (1999)
- ILO Social Compliance Audit Manuals for the Construction Industry
- SOCIAL COMPLIANCE 01 - Corporate Social Responsibility: Rules & Guidelines
- SOCIAL COMPLIANCE 02 - Social Compliance Management System in Construction Industry
- SOCIAL COMPLIANCE 03 - Social Compliance Management in the Construction Industry Supply Chain
- SOCIAL COMPLIANCE 04 - Steps to Ensuring Occupational Health and Safety in the Construction Industry
- SOCIAL COMPLIANCE 05 - Regulation of Working and Rest Periods in the Construction Industry
- SOCIAL COMPLIANCE 06 - Fair Remuneration in the Construction Industry
- SOCIAL COMPLIANCE 07 - Employee Participation and Protection in the Social Management System
- SOCIAL COMPLIANCE 08 - Continuity of Employment in the Construction Sector
- SOCIAL COMPLIANCE 09 - Prevention of Violence, Harassment and Discrimination in the Construction Industry
- SOCIAL COMPLIANCE 10 - Preventing Bribery and Corruption in the Construction Industry
- SOCIAL COMPLIANCE 11 - Employing Foreign Workers in the Construction Industry
- SOCIAL COMPLIANCE 12 - Waste Management and Energy in the Construction Industry
- SOCIAL COMPLIANCE 13 - Vulnerable Groups in the Construction Industry: Young, Women, Pregnant, Breastfeeding, Disabled and 50+ Employees
- ILO 190 Convention on The Elimination of Violence and Harassment at Work⁵

⁴ <https://www.ilo.org/regions-and-countries/europe-and-central-asia/turkiye/conventions-ratified-turkiye>

⁵ https://webapps.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190



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3 INSTITUTIONAL ARRANGEMENTS

The GAP will be implemented in line with AIB requirements and following organizational arrangements.

3.1 Organizational Structure

KGM is a public institution affiliated to the MoTI with a special budget for finance. KGM has a range of responsibilities related to the planning, construction, maintenance, and management of the country's road infrastructure KGM's duties are summarized below.

- **Planning and development of highways:** KGM is responsible for developing plans and strategies for the construction and expansion of Türkiye's highway network.
- **Construction and maintenance of highways:** KGM oversees the construction, maintenance, and repair of highways throughout Türkiye, including both urban and rural areas.
- **Traffic management:** KGM is involved in managing traffic flow, implementing safety measures, and improving transportation efficiency on highways.
- **Road safety:** KGM works to improve road safety by implementing measures such as signage, speed limits, and traffic enforcement.
- **Environmental protection:** KGM considers environmental factors in highway construction and maintenance projects to minimize their impact on the environment.
- **Coordination with other agencies:** KGM collaborates with other government agencies, local authorities, and private sector entities involved in transportation and infrastructure development.

Headquartered in Ankara, KGM operates through a network of 18 Regional Directorates strategically located throughout the country.

KGM serves as the implementing agency for the Project, operating through its central offices in Ankara and two of its Regional Directorates (5th and 8th). Subprojects are being implemented and supervised by the Regional Directorate responsible for the area where they are located.

The project will have one PIU in Ankara and two RIUs within Regional Directorates 5 and 8. The PIU will primarily coordinate project preparation and implementation, while the RIUs will manage day-to-day activities, procurement, supervision, and monitoring specific to their respective subprojects. The PIU established within KGM consists of the Project Director, PIU Head, Environmental and Social Specialist(s), Procurement Specialist, Financial Management (FM) Specialist, Technical Specialist and Monitoring and Evaluation (M&E) Specialist along with two RIUs. PIU and each RIU have E&S staff to be able to manage effective implementation of the project. Within the scope of the Türkiye Emergency Road Rehabilitation and Reconstruction Project, the key local authorities are KGM 8th Regional Directorate (Elazığ) and KGM 5th Regional Directorate (Mersin), which operate under KGM as a regional organization

The Contractors of the subprojects listed in Table 2, who will carry out the execution of the rehabilitation and reconstruction works will be responsible for all of their staff (including subcontractor staff, if any) to have E&S responsibility awareness to ensure that E&S requirements are implemented smoothly on site.

As the project owner, KGM is responsible to manage the ESMP and other sub-project including GAP regarding the Project and to ensure that the necessary mechanisms are developed and implemented by the Contractors. The GAP of the Project will be managed under the ESMS of the KGM. KGM, in accordance with its own organizational chart, will carry out monitoring and coordination activities to ensure that the main contractors within the scope of the Project carry



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out the activities defined in the management and action plans in accordance with their objectives. In this context, KGM's organizational structure is presented in Figure 2.



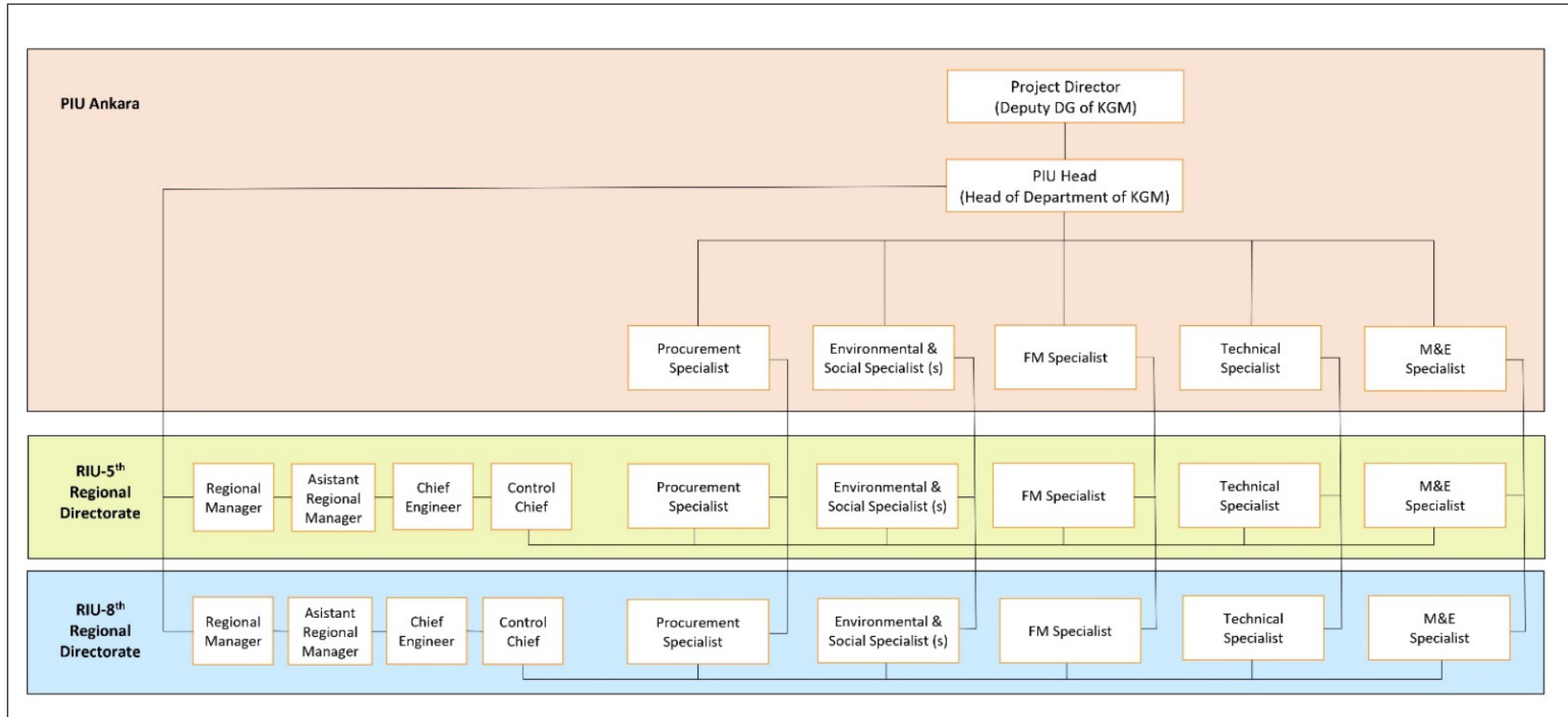


Figure 2. ESMS Organizational Structure



3.2 Roles and Responsibilities

As the project owner, KGM is responsible for the implementation and monitoring of the GAP according to the following roles and responsibilities. In this context, the framework regarding the duties and responsibilities of the KGM Project Implementation Unit (PIU) and the Contractor is presented in Table 4.

Table 4. Roles and Responsibilities Regarding the Implementation of the GAP

KGM PIU
<p><u>Project Director and PIU Head</u></p> <ul style="list-style-type: none"> ▪ Responsible for the overall coordination and management of the project or program at the central level. ▪ Ensuring effective implementation of GAP and related E&S sub-management plans along with fulfillment of all commitments within the scope of ESMP. ▪ Sharing the GAP with the Contractor ▪ Periodic reporting (determined as semi-annually) to the Bank regarding the implementation of the GAP. ▪ When changes occur regarding engineering, route, legislation, environmental-social impacts, Project strategy or Stakeholders, ensuring that the GAP is updated according to the relevant changes. <p><u>Environmental, Social and M&E Specialists</u></p> <ul style="list-style-type: none"> ▪ Providing trainings defined in the Gender Action Plan to all Project staff, if necessary. ▪ Ensuring that monitoring and auditing of GAP applications are carried out and reported to the Bank. ▪ Audit of contractor activities in line with GAP requirements. ▪ Carrying out monitoring activities for Contractors to ensure that the training and actions defined for employees are implemented. ▪ Ensuring compliance with project standards, and having the contractor make the necessary urgent corrections in case of non-compliance. ▪ Ensuring that stakeholder engagement is carried out in a way that includes GAP requirements. ▪ Updating the Gap when necessary. ▪ Implementation of the Grievance Redress Mechanism to include GAP requirements. ▪ Preparing progress reports by collecting necessary data from contractors regarding the implementation of the plan. <p><u>Purchasing Manager</u></p> <ul style="list-style-type: none"> ▪ Managing the purchasing process for the purchase of goods, services and works required for the implementation of the project. ▪ To manage the process in accordance with the training and codes of conduct prepared against gender equality, child labor and forced labor in the process of identifying potential suppliers, contractors and vendors through market research, supplier evaluation and competitive tender processes. ▪ Negotiating contract terms and conditions with selected suppliers and contractors to ensure agreements meet project requirements and reduce risks. ▪ Ensuring compliance with purchasing policies, procedures and regulations and maintaining accurate records of purchasing transactions and documents. ▪ Establish and maintain positive relationships with suppliers and contractors to enhance collaboration, communication and mutual trust.
RIU
<ul style="list-style-type: none"> ▪ Responsible for implementing project activities at the regional or local level according to the guidelines and instructions provided by the central PIU. ▪ Ensuring implementation of the ESMP along with fulfillment of all commitments within the scope of ESMP. ▪ Engagement with local stakeholders, including communities, government authorities, and NGOs, to ensure effective project implementation and address local concerns. ▪ Handling procurement processes and contract management for goods, services, and works required for project implementation within their respective regions. ▪ Identifying and addressing implementation challenges and bottlenecks at the regional level, working collaboratively with the Central PIU and other stakeholders to find solutions.



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Supervision Consultant

- Supervision of construction and/or rehabilitation works and installation of equipment,
- Monitoring and evaluating the performance of the services provided by the Contractor,
- Identification and management of risks and impacts related to environmental, social and OHS issues,
- Ensuring initiation of corrective actions where necessary, ensuring implementation of mitigation measures by the contractor,
- Follow up and audit the contractor's activities periodically in line with the measures and commitments given in this ESMP,
- Periodic monitoring and reporting to the KGM PIU/RIU regarding the implementation of the ESMP.

Contractor

- Fulfillment of all requirements of the ESMP and related E&S sub-management plans.
- Implementation of additional commitments determined by KGM and/or AIIB.
- Developing its own site-specific Construction ESMP including relevant E&S sub-management plans.
- Ensuring compliance with project standards, obtaining all relevant permits and licenses.
- Monitoring construction activities (including subcontractor activities, if any) and taking measures within the scope of the ESMP.
- Development of implementation and monitoring plans / procedures in line with the ESMP structure, implementation after the approval of KGM.
- Employment of competent EHS staff within the scope of the project.
- Providing the necessary trainings to all project staff including sub-contractor staff on environmental, social and occupational health and safety issues.
- Providing follow-up and analysis of environmental, social occupational health and safety accidents.
- Environmental inspections, monitoring and audits related to ESMP practices, periodic reporting to KGM.
- Prompt notification of accident and incidents and keeping an incident register at construction site throughout the Project life.
- Carrying out the management of change process via filling the Management of Change Process (MCP) Form and informing KGM and AIIB about the details and the results of the process including at the final design stage.



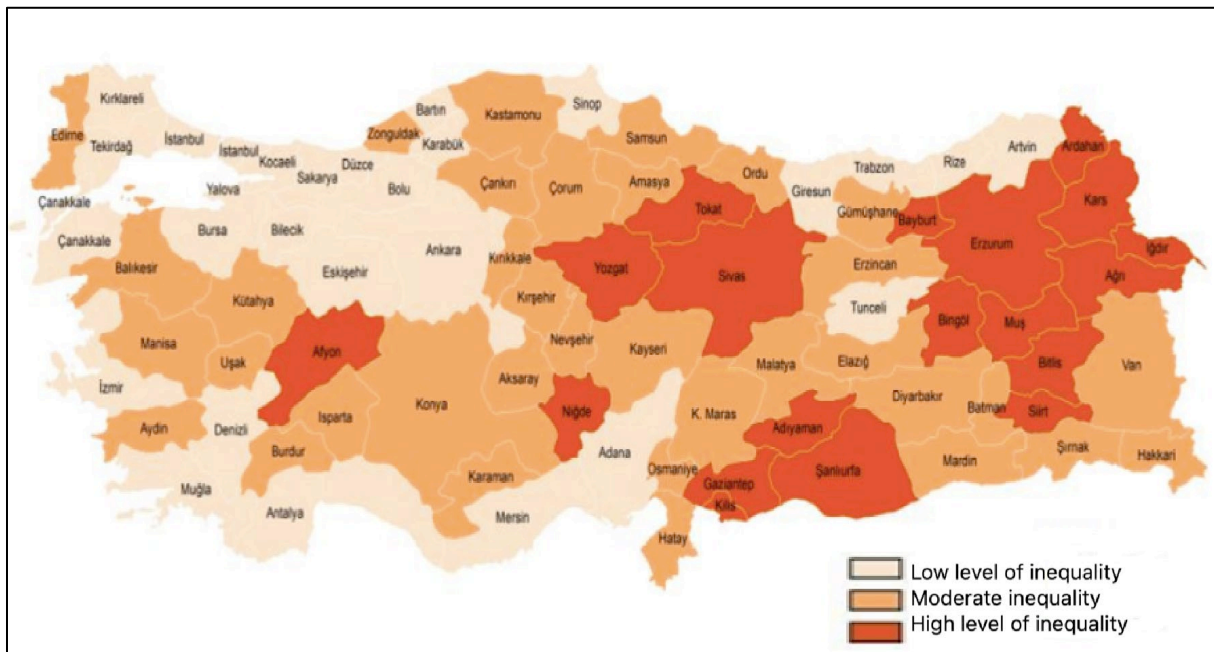
4 GENDER ASSESSMENT

During the ESIA field studies and desk-based literature and data studies, in addition to the social impacts of the Project, the Project impacts on gender were also evaluated.

The Economic Policy Research Foundation of Türkiye (TEPAV) "Gender Equality Scorecard 2018 for 81 Cities with Comparisons" report evaluated the situation of the provinces according to the gender inequality indicators and index scores at the local level⁶.

According to the evaluation in the report, the status of the provinces in terms of gender indicators is shown on the map below.

As seen in the map, Adıyaman and Gaziantep provinces have high level of inequality in terms of gender indicators.



Source: https://www.oran.org.tr/images/dosyalar/20190918155744_2.pdf

Figure 3. Gender Inequality Levels

After the earthquake, it was revealed as a result of research and reports that existing gender inequalities deepened even more.

In this regard, the report "Gender Analysis in Earthquake Regions: Women's Access to Justice and Legal Aid"⁷, published with the support of the European Union and the Council of Europe, highlighted the following findings:

- *Half of the population of the 11 affected provinces are made up of women and girls. 54% of the population over the age of 60 are women; 8% of 3.5 million households have at least one child, and the head of the family in these households is a woman.*
- *Women are not adequately represented in political decision-making processes in the affected provinces.*
- *Women's labor force participation rate in the affected region is lower than in Türkiye overall and labor force participation is low, there is also a serious gender gap between men and women in employment.*

⁶https://www.tepav.org.tr/upload/files/1520402632-7.Karsilastirmalarla_81_Il_Icin_Toplumsal_Cinsiyet_Esitligi_Karnesi_2018.pdf

⁷ <https://rm.coe.int/tur-2023-wa2j-deprem-bolgelerinde-toplumsal-cinsiyet-analizi/1680ae1fad>

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- *Agriculture is one of the main sectors in the region. Almost all women working in the agricultural sector work as unpaid family workers (78.7%; this rate for men is 20.2%), thus they are deprived of social security benefits, health insurance, union rights and are exposed to poor working conditions and low wages.*
- *According to official data on domestic violence against women before the earthquake, the rate of reporting to the authorities is relatively lower in the affected areas and the level of acceptance in cases of violence is higher.*
- *The rate of early marriage among the three regions where the provinces affected by the earthquake are distributed is well above the country average.*

One of the most important findings in the reports and data within the Project Aol is that the rate of unregistered work of women, especially in agriculture, service and industry, is high, and that the proportion of women who continue to earn their living as female heads of households and are responsible for the care of their families has increased after the earthquake⁸.

As underlined by the CEDAW Committee in its General Recommendation No. 37, women and girls are more negatively affected by the consequences of natural disasters due to gender inequalities. The relevant decision states that the lack of physical security, especially in temporary settlements, and the lack of safe and accessible infrastructure and services, affect women and girls. It also draws attention to the fact that it causes an increase in gender-based violence against women.

Based on the field studies conducted in Hatay, Malatya, Adiyaman and Gaziantep, which are the project Aol provinces, the *Women and Girls After the Earthquake Report*⁹ published by UN Women revealed that GBVH risks increase both in temporary shelter areas and in daily life. Children, in particular, are among the groups most affected by gender inequality. As a reflection of gender inequality, the problem of girls being married at an early age and boys being directed to child labor due to increasing economic difficulties was included in the report.

GAP aims to integrate gender equality and social inclusion issues into the Project. As in many countries, high gender inequality in our country also causes poverty to be high. Therefore, gender inequality is the main obstacle to economic growth and poverty reduction.

Based on this approach, GAP, as a sub-action plan of the Project, aims to maximize the positive impact of the Project on economic growth and poverty reduction by ensuring gender equality throughout the life of the Project.

The evaluations set out in Environmental and Social Due Diligence (ESDD) and ESIA for all sub-projects within the scope of the Project indicate that Project activities, Project camp sites and worker influx will not cause any demographic change on local communities, sexual exploitation, and abuse (SEA), sexual harassment (SH) has revealed that it will not trigger risks in matters.

However, since the majority of workers working on the project are men, certain preventive mechanisms have been defined, which are also stated in this Gender Action Plan.

4.1 Gender Related Risks

4.1.1 Population Influx Caused GBVH Risks

As defined and revealed in ESIA, since the population of the settlements affected by the camp area is low, mitigation measures have been defined by foreseeing that the camp area, where

⁸ <https://www.kadinisci.org/guncel/deprem-bolgesinde-istihdam-edilen-kadinlarin-yarisi-kayit-disi/>

⁹ [https://eca.unwomen.org/sites/default/files/2024-](https://eca.unwomen.org/sites/default/files/2024-03/her_aftermath_deprem_sonrasi_adalete_erisimin_onundeki_engeller_aralik_23_tr_0.pdf)

[03/her_aftermath_deprem_sonrasi_adalete_erisimin_onundeki_engeller_aralik_23_tr_0.pdf](https://eca.unwomen.org/sites/default/files/2024-03/her_aftermath_deprem_sonrasi_adalete_erisimin_onundeki_engeller_aralik_23_tr_0.pdf)



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the worker population, which is predominantly male, will have effects on the demographic structure and social structure in the nearby settlements.

Within the scope of population change, gender inequalities and risks that may arise for vulnerable groups are important.

The fact that the ratio of male workers is very high compared to women may reveal inequalities in women's participation in social life and use of public spaces and/or may reveal gender-based security problems, causing women to feel less safe in social and daily life.

The necessity to address gender-based violence and cases of sexual harassment and abuse in social matters underlines the need for additional measures. In this context, the Project will be managed with a gender-inclusive approach.

These improvements and measures will be implemented to ensure that the opinions, suggestions, and complaints of vulnerable groups are conveyed to the Project smoothly and in a timely manner.

4.1.2 Working Conditions and Women Employment

Within the scope of ESIA, all camp sites to be used in Sub-Projects were visited and their current conditions were revealed (CNR-KGM-TERRRP-ESIA-001; Labor and Working Conditions Section).

All blue-collar workers working in the field during the construction activities within the scope of the project are men.

However, there are white-collar female employees working in OHS, public relations and engineering works in the Project construction activities. Additionally, women work in service areas such as cooking, cleaning and security in construction sites. In this context, improving working conditions with a gender equality approach is considered among the main objectives of this GAP.

When working conditions are evaluated in terms of training, wage policy and rights granted to employees, the principle of equality will be adopted and implemented. In addition, it is within the scope of GAP to physically evaluate the working conditions of blue-collar female employees working in service and cleaning services at construction sites and to take actions to improve their working conditions.

It is important to regulate the physical conditions in the working environment, to provide facilities such as protective equipment and work clothes that will be needed in case of employing female employees, and to make arrangements to meet the necessary conditions in order to increase female employment.

It is recommended to follow the relevant actions in order to ensure these standards and maintain them in accordance with the AIB ESF.

In parallel, Gender-Based Violence and Harassment (GBVH) and workplace harassment, bullying, violence and SEA/SH issues have been added to the grievance redress mechanism with a separate definition. This revised Grievance Redress Mechanism should be explained to women and all other employees working for both main contractors and subcontractors through information and training.

The trainings given to the employees will be explanatory about the concepts of BV and SEA/SH. At the same time, through the trainings, it will be ensured that workers learn the Grievance Redress Mechanism of the Project (explained in detail in the Project's SEP document) and the steps to be followed in exercising their legal rights.

ESMP including equality, non-discrimination developed as a part of the ESIA of the Project will be implemented throughout the construction phase. Starting from the working period, all



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workers will be issued written contract containing job description, work hours, salary, rights and duties, code of conduct, and information about GRM for workers.

A "Code of Conduct" annex should be prepared and provided to the Main Project Contractors by KGM to add the contracts of subcontractors and employees, containing the following contents and which all employees can read, understand and sign. The Code of Conduct should include, but is not limited to, the subject of GBVH and related topics below, as well as core principles and principles.

- Discrimination,
- Sexual harassment,
- Violence/abuse,
- Bullying
- Abuse,
- Respect for confidentiality,
- Standards of professionalism
- Communication rules,
- Relations with other employees,

All workers will be given training on discrimination and codes of conduct.

4.2 Community Health, Safety and Security

4.2.1 Infectious diseases

Population influx due to worker accommodation may introduce new infectious diseases, including sexually transmitted diseases, to the project area.

The presence of large numbers of construction workers, potentially young men, may contribute to an increased risk of infectious diseases such as HIV/AIDS.

Considering all these circumstances, detailed health checks and reports of all subcontractors, including their employees and workers, will be a prerequisite for the recruitment and mobilization of Project employees.

4.2.2 Social Conflict Risk

Within the scope of ESIA, the risk of social disharmony and conflict that may occur between workers coming from outside the province and unfamiliar with the local culture and the local population has been defined.

If the majority of the workers who will work within the scope of the Project are not recruited from local communities and migrant workers predominate, there may be a risk that migrant workers may not be able to adapt to the local social and cultural structure. This can lead to conflicts between workers and local community members. These conflicts can arise in the following ways:

- The risk of illegal behavior and crime may be increased due to illicit relationships or informal economic and social relationships between local residents and workers.
- Inadequate interaction and communication with local communities can lead to local communities' concerns and complaints being ignored.
- Due to the hiring of external employees instead of local employment, local people may not accept cooperation with the Project and may see Project employees as a threat to the local people.
- Conflicts may arise due to the workers, subcontractors and security personnel who will be in face-to-face communication with the local people during the project process do



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not have knowledge and awareness about the local cultural structure and sensitivity gender.

In this context, the following mitigation measures have been defined within the scope of ESIA and detailed in the ESIA and ESMP of the Project.

- Considering this situation, in order to avoid negative communication with the surrounding settlements and to prevent conflicts arising from social and cultural disputes, the interaction between workers and local people will be minimized and all needs will be met within the camp area.
- Training on community health and safety (CHS), Sexual exploitation and abuse (SEA) of the populations and sexual harassment (SH), traffic security, communication with local people should be provided for workers, security personnel and drivers staying at the camp site, and the code of conduct should also include compliance with the measures taken on these issues as part of the contracts.
- A Grievance Redress Mechanism will be established for both workers and PAPs which increases trust and minimizes conflict by handling disagreements skillfully.
- Prioritizing local procurement and local employment to minimize the negative effects of the Project on population and demography will not only increase project acceptance but also reduce potential socio-cultural conflicts arising from population growth. Aligning the cultural characteristics of external workers with the culture of the region promotes the creation of a harmonious environment for construction.

4.2.3 Security Issues

Security issue is an important CHS Project within the scope of ESIA and GAP.

It is important that security personnel in these areas are primarily selected from among the local population with sufficient qualifications and certification.

If security personnel employment cannot be achieved through local employment, in addition to the selection of security personnel according to their qualifications such as having received the necessary training, having the appropriate certification, social and cultural awareness should also be developed as they will frequently encounter local communities.

While security personnel are performing their duties, measures will be taken to prevent the possible use of force against employees and/or communities in the study area. For this sensitive work, the selection of security guards from the local will be beneficial in terms of facilitating communication with the local people.

Security personnel must also receive comprehensive training on GBVH. Employment of female security personnel in the project is also important for managing GBVH risks.

4.3 Prevention of Child Labor and Forced Labor

All contractors within the scope of the project are obliged to prohibit child labor, forced labor, and ensure equal treatment and gender equality for employees, including the ILO conventions under the following headings: freedom of association, child labor, forced labor, equal treatment of employees, and gender equality.

In this context, KGM will ensure that the actions given in this GAP are taken to ensure that all these laws, procedures and agreements are implemented throughout the Project, regulating the management of working conditions and labor relations, including the prevention of Child Labor and Forced Labor.



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4.4 Vulnerable/Disadvantaged Individuals/Groups

According to AIIB's definition, vulnerable groups or individuals refer to people who, by virtue of factors beyond their control: (a) may be more likely to be adversely affected by the Project's environmental and social impacts; and (b) may be more limited than others in their ability to claim or take advantage of Project benefits. Such individuals or groups are also more likely to be excluded from or unable to participate fully in the mainstream consultation process and may require specific measures or assistance (or both) to do so.

Vulnerable groups¹⁰ among the Project affected persons (PAPs) indirectly or directly affected by the Project activities were taken into consideration within the scope of this GAP, and actions related to these groups were defined. Vulnerable groups living in the project impact area are:

- People with physical or mental disabilities
- PAPs with chronic diseases or bedridden people
- Female heads of households
- Poor people living on government or association aid within Project Aol
- Elderly people in need of care and social assistance
- Unemployed (even though they are looking for a job)
- People who are homebound due to chronic illness
- Illiterate adults
- Earthquake victims
- Refugees, migrants, citizens with limited Turkish language abilities
- Villagers who do not own land and work on other people's lands as daily wage earners.

For the groups whose vulnerable group categories are defined above, the following evaluations can be made regarding the numbers in Project Aol due to the fact that the current conditions after the earthquake have not yet become permanent and stable. The proportion of vulnerable groups within the population in the project impact area is high. Especially after the earthquake, although the rate of vulnerable groups affected by the earthquake within the Project Aol is high, the number of population data cannot be determined yet.

Since its geographical location, Hatay province is among the areas with the highest number of Syrian refugees. In terms of the number of Syrian refugees, Gaziantep and Osmaniye provinces follow, respectively.

Figure 4 shows the number of Syrian refugees in the cities in Türkiye, including the Project Aol.

¹⁰ https://www.aiib.org/en/policies-strategies/_download/environment-framework/AIIB-Revised-Environmental-and-Social-Framework-ESF-May-2021-final.pdf



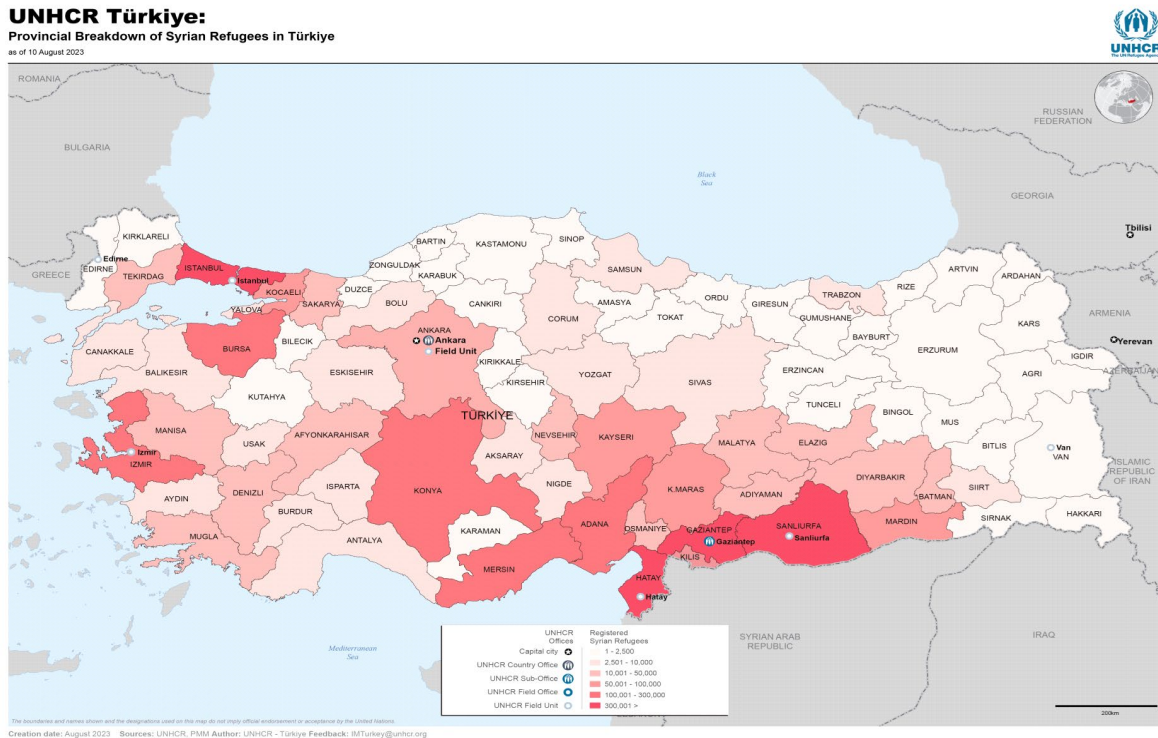


Figure 4. Syrian Refugees in Türkiye

Poverty is an important indicator within Project Aol. The regions with the highest poverty rate in the region were Hatay, Kahramanmaraş and Osmaniye provinces, which were most affected by the earthquake. According to 2023 TUIK data in these provinces, the poverty rate was determined to be 10.4 percent.

These vulnerable groups, and women within these vulnerable groups, have been taken into account within the scope of this GAP developed for the Project impact area.

4.5 Land Acquisition and Livelihood

Project RP/LRP document was developed to identify and compensate for potential losses in land acquisition and livelihoods needed within the scope of the Project.

Within the whole Project Aol, as a result of all the implemented avoidance measures, only 1 parcel within the scope of the Project is affected by land acquisition. Land acquisition was necessary for the Antakya-Samandağ Road (Including Samandağ Crossing) Section Supply Construction Works, which is sub-project No. 3 and is located within the borders of the 5th Regional Directorate of Highways.

This land is the only land expropriated within the scope of the Project and evaluated within the scope of involuntary resettlement.

In addition to the land acquisition, potential livelihood impacts have been defined in the Project RP. The livelihood impact that may arise from construction and rehabilitation activities within the scope of the project may result in blocking access to lands. This impact will result from the measures that must be implemented by communities and third parties to prevent unauthorized passage through the construction site and to eliminate public health and safety risks.

RP/LRP also includes additional measures and recovery supports for vulnerable groups and women affected by the Project.

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All of the following PAPs within the scope of land acquisition, owners, shareholders, and official tenants of the properties, individuals/householders and vulnerable groups affected by land acquisition/ expropriation will be considered potential beneficiaries of RP/LRP. In addition to the groups defined as sensitive groups within the scope of the Project, the RP document also considers the following groups as sensitive groups due to Project-related impacts:

- Unregistered residential users,
- One or more households living in a household,
- Disadvantaged groups who do not have formal contracts,
- Shareholder residential users.

In this context, the RP entitlement assessment approach and compensation strategy included stakeholder information actions to ensure that vulnerable groups and women are aware of RP supports, assistance so that they can apply for RP/LRP supports, and vulnerable group supports.

These supports were announced within the scope of RP/LRP, and vulnerable groups (VGs) and woman inclusive actions were defined in Table 5.

4.6 Stakeholder Engagement and Grievance Redress Mechanism of the Project

Türkiye currently has a national referral system for gender-based violence, which is followed by all institutions not only for domestic violence, but also for harassment, bullying, violence and SEA/SH in the workplace. These are under the auspices of the Ministry of Family, Labor and Social Services and are currently defined in detail in both the Turkish Labor Code and the Turkish Penal Code, explaining unacceptable behavior and detailing the relevant penalties.

KGM is the body responsible for ensuring the proper operation of GRM, in accordance with national legislation and AIIB standards.

The Project specific SEP including GRM also defines actions involving gender related issues and complaints. Accordingly, in line with the notifications received by the Grievance Redress Mechanism, the units and employees who first handle the notification will be trained on how to manage complaints regarding SEA/SH issues. All relevant units and staff of the project will be trained in basic skills to respond compassionately and non-judgmentally to SEA/SH disclosures and to know how to intervene.

Complaints regarding exploitation and unfair treatment of female workers, including sexual harassment and abuse in the workplace, will be prioritized and action will be taken. Designated relevant authorities will be informed about investigations into Gender-Based Violence/SEA/SH cases and the measures taken as a result of these investigations.



5 GENDER ACTION PLAN

The following Gender Action Plan (GAP) outlines actionable recommendations to be implemented to enhance gender equality and equal opportunities in Project implementation. Targets for each of the action items are to be set and committed by KGM and Contractors.

Table 5. Gender Action Plan

Issue	Action	Time Frame	Key Performance Indicators	Monitoring Location	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
Increasing awareness of gender equality in working conditions	<p>Updating and adding a code of conduct document, which includes provisions on ensuring gender equality, preventing forced labor and child labor, and basic human rights, as one of the annexes to all sub-Project Contractor's agreements and their employees' contracts.</p> <p>Ensure that code of conduct is clearly communicated and accessible to management, supervisors, and workers.</p> <p>Train managers and supervisors in the application of the policies.</p> <p>Keep accurate records of number or percentage of men and women labor (skilled and unskilled) days and skilled</p> <p>Apply a gender-sensitive approach to the risk assessment for specific work tasks and ensure that all female employees are provided with Personal Protective Equipment that are appropriate for women's physiques.</p> <p>Beginning of the works, all workers will be issued written contract containing job description, work hours, salary, rights and duties, a code of conduct, and information about GRM for workers.</p> <p>Workers will be allowed access to the GRM and will be required to be aware of this Mechanism.</p> <p>All workers will be given training on discrimination and codes of conduct.</p> <p>The trainings given to the employees will be explanatory about the concepts of BV and SEA/SH. At the same time, through the trainings, it will be ensured that workers learn the GRM of the Project (explained in detail in the Project's SEP document) and the steps to be followed in exercising their legal rights.</p>	<ul style="list-style-type: none"> ▪ At the beginning of the Project, following the plans are approved 	<ul style="list-style-type: none"> ▪ Revised contracts ▪ Added Code of Conduct document ▪ Training Participants Lists ▪ Records of number or percentage of men and women labor (skilled and unskilled) days ▪ Risk Assessment Reports 	All-Sub Project Areas	Internal audits and reports	Monthly	Monthly	Contractors
	Quarterly					Quarterly	KGM	



Issue	Action	Time Frame	Key Performance Indicators	Monitoring Location	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
Improving working conditions in a gender responsible manner.	Ensuring the employees' physical environments are provided for women in an equal manner such as transportation services, changing rooms, toilets and sinks in construction sites to provide equal opportunities and improving to provide equal opportunities for both men and women	<ul style="list-style-type: none"> ▪ Before the worker accommodation at all camp sites to be used by the Contractor and sub-contractors. ▪ When deemed necessary after regular checks every month 	<ul style="list-style-type: none"> ▪ Number of separate toilets per female employee, ▪ Providing separate dressing room facilities for women, ▪ Number of women using the services ▪ Number of complaints closed regarding physical working conditions in the employee complaint mechanism. 	Project Construction and Camp sites	Internal audits and reports Grievance records	Monthly	Monthly	Contractors
						Quarterly	Quarterly	KGM
Improving the gender awareness of the Project security	Providing gender awareness training to Construction Site Security personnel and training on gender-based violence and harassment issues including; <ul style="list-style-type: none"> ▪ Public communication, ▪ Social and cultural compliance, ▪ GRM, ▪ GBV, SEA/SH 	<ul style="list-style-type: none"> ▪ Before security workers or security sub-contractors start work 	<ul style="list-style-type: none"> ▪ Number of trainings ▪ Number of personnel participating in training according to the sex ▪ Grievance Redress Mechanism records on GBVH 	Project Construction and Camp sites	Internal audits and reports	Monthly	Monthly	Contractor
						Quarterly	Quarterly	KGM
Prevention of Child labor, forced labor, gender discrimination and unregistered employment in the Contractors and supply chain	In order to prevent child labor, forced labor and gender discrimination, the work permits of all subcontractors and suppliers working within the scope of the Project will be checked and recruitment will be made. Code of Conduct will be included in the contracts of all sub-contractors and suppliers to prevent child labor, forced labor and gender discrimination.	<ul style="list-style-type: none"> ▪ Every time an agreement is made with a new worker, sub-contractor or supplier, before all these suppliers, sub-contractors and their workers start work 	<ul style="list-style-type: none"> ▪ Contracts of the employee ▪ Grievance Redress Mechanism records 	All -Sub Project Contractors, and sub-contractors	Internal audits and reports	Monthly	Monthly	Contractor



Issue	Action	Time Frame	Key Performance Indicators	Monitoring Location	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
Awareness raising on child labor, forced labor, gender discrimination, on GRM, GBV, SEA/SH in the sub-contractors and supply chain	Providing induction trainings to the sub-contractor and suppliers social, HR and OHS officials including; Child labor, forced labor, gender discrimination, social and cultural compliance, GRM, GBV, SEA/SH.	<ul style="list-style-type: none"> ▪ Every time an agreement is made with a new worker, sub-contractor or supplier, before all these suppliers, sub-contractors and their workers start work 	<ul style="list-style-type: none"> ▪ Number of trainings ▪ Number of personnel participating in training according to the sex 	All-Sub Project Contractors, and sub-contractors	Internal audits and reports	Monthly	Monthly	Contractor
Awareness raising on gender discrimination, GRM, GBV, SEA/SH in the community	Conduct awareness raising among communities on the behaviors they can expect and not to expect from Project workers. Provide clear messaging on what GBVH, SEA/SH is, the ways to report it and how reports will be handled. Disseminate contact information and details on the available and accessible grievance channels and contact people to raise GBVH-related cases confidentially.	<ul style="list-style-type: none"> ▪ Within the first 3 months of Contractor and/or subcontractors mobilizing and starting to work 	<ul style="list-style-type: none"> ▪ Number of personnel participating in training according to the sex ▪ Number of awareness raising activities carried out ▪ Number of information provided on what GBVH, SEA/SH is, the ways to report it and how reports will be handled. ▪ Number of the disseminated contact information on the available and accessible grievance channels 	All-Sub Project Contractors, sub-contractors	Internal audits and reports	Monthly	Monthly	Contractor
Preventing potential Community Disturbance	Workers coming from outside the city will be provided with the necessary information and training by the Contractor regarding dialogue and communication with the local people and will be monitored through the Grievance Redress Mechanism. KGM will ensure that the Contractor coordinate and provide definition and delivery of training to workers on public communication, social and cultural adaptation, GRM, GBV, SEA/SH in order to prevent the rules of conduct and local people from being negatively affected by foreign employees and outsiders.	<ul style="list-style-type: none"> ▪ At the beginning of the Project, following the plans are approved 	<ul style="list-style-type: none"> ▪ Number of trainings ▪ Number of personnel participating in training ▪ Grievance Redress Mechanism reports 	All-Sub Project area and all departments	Internal audits and reports	Monthly	Monthly	Contractors
						Quarterly	Quarterly	KGM



Issue	Action	Time Frame	Key Performance Indicators	Monitoring Location	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
Ensuring the gender-inclusive of the Workers Grievance Redress Mechanism	Through the training for all employees, workers will be informed about the Project's Grievance Redress Mechanism and the steps to be followed when exercising their legal rights. Within the scope of GRM information, necessary information will be provided regarding GBV and SEA/SH complaints management.	At the beginning of the Project, following the plans are approved	<ul style="list-style-type: none"> ▪ Number of trainings ▪ Number of personnel participating in training according to the sex ▪ Grievance Redress Mechanism records according to the sex 	All-Sub Project area and all departments	Training records Observation of the personnel behavior Internal audits and reports	Monthly	Monthly	Contractors
						Quarterly	Quarterly	KGM
Ensuring the gender-inclusiveness of the Grievance Redress Mechanism	<p>Inform vulnerable groups and women in the Project impact area about the Project Grievance Redress Mechanism including the GBVH complaints.</p> <p>Ensuring that vulnerable groups and women are aware of the Project Grievance Redress Mechanism by holding meetings with the headmen in the Project impact area.</p> <p>Providing safety and health information about the project, including vulnerable groups and women.</p> <p>Establish and maintain gender-disaggregated grievance register. A separate database should be maintained by the Project to monitor such grievances.</p>	Within the first month immediately after the approval of the SEP including GRM document	<ul style="list-style-type: none"> ▪ Number of information activities ▪ Grievance Redress Mechanism records according to the sex 	All-Sub Project impacted districts	Internal audits and reports	Monthly	Monthly	KGM
Ensuring social and gender inclusion in stakeholder engagement during project implementation	<p>Provide safety and health information meetings in the Project affected settlements of the Project, on the Project risks, mitigation measures including vulnerable groups and women.</p> <p>Encourage the participation of local communities, including women, in consultation during the project implementation.</p> <p>Record women's participation in terms of numbers, percentages, and how their suggestions and concerns have been addressed.</p> <p>ESIA disclosure package including ESIA, NTS, RP-LRP, SEP, Grievance Redress Mechanism, and other documentation to be made publicly available. Consider venues accessibility to women and making the documentation available in public places frequented by women.</p> <p>Planning the consultation meetings to accommodate for women's time restraints caused by, e.g., their care duty and consider the accessibility of the venue. If necessary, separate meetings should be conducted for men and women from nearby communities.</p>	Within the first month immediately after the approval of the SEP including GRM document	<ul style="list-style-type: none"> ▪ Number of information activities ▪ Number of informed VG and women 	All-Sub Project impacted districts	Internal audits and reports	Monthly	Monthly	KGM



Issue	Action	Time Frame	Key Performance Indicators	Monitoring Location	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
	Providing training on engagement with women, especially considering gender-sensitive issues for Social Experts in PIUs and RIUs or the CLO of the Contractor (if there will be one)							
Resettlement and Livelihood restoration	<p>Specific attention will be paid to women and vulnerable people during dissemination of information, consultation, negotiation and post-resettlement monitoring processes through development and implementation of special information and consultation methods and tools designed to address the needs of each vulnerable PAP.</p> <p>Ensure that women without titles to the land they occupy are considered eligible for compensation.</p> <p>When assessing appropriate compensation for economic displacement, consider women's role in the informal labor market, including the agricultural sector.</p> <p>Ensure that women have equal access to livelihood restoration in terms of skills training and employment opportunities enabling them to improve their economic status on equal terms.</p> <p>Provide vulnerable groups, including women with multiple vulnerabilities with targeted in-kind assistance, and measures, which will be designed through direct engagement with the affected households in consideration of their special needs, including:</p> <ul style="list-style-type: none"> ▪ Assistance to access consultancy services and livelihood restoration initiatives. ▪ Assistance to accessing compensation payments. ▪ Assistance in accessing governmental institutions related to the resettlement process ▪ Assist illiterate, elderly, and other persons in need in reviewing and processing official documents relevant to expropriation. <p>Priority for job opportunities to one of the household members eligible and able to work and meeting the Project's employment requirements.</p>	<ul style="list-style-type: none"> ▪ During the approval and implementation process of the RP/LRP plan 	<ul style="list-style-type: none"> ▪ Number of assistances provided to Vulnerable Groups ▪ Number of information provided to women and VG ▪ Number of supports provided to VG ▪ Number and rates of RP/LRP compensation and supports according to gender breakdown 	All-Sub Project impacted districts	Internal audits and reports	Monthly	Monthly	KGM



6 RELATED/REFERENCE DOCUMENTS

Document/Report Name	Document/Report ID
Stakeholder Engagement Plan	CNR-KGM-TERRRP-SEP-001
Environmental and Social Due Diligence	CNR-KGM-TERRRP-ESDD-001
Environmental and Social Impact Assessment	CNR-KGM-TERRRP-ESIA-001
ESMPs of the Project	CNR-KGM-TERRRP-ESMP-001 CNR-KGM-TERRRP-ESMP-002 CNR-KGM-TERRRP-ESMP-003 CNR-KGM-TERRRP-ESMP-004 CNR-KGM-TERRRP-ESMP-005

