



VERGO ENERJİ SİSTEMLERİ SANAYİ VE TİCARET ANONİM.ŞİRKETİ.
OCCUPATIONAL HEALT AND SAFETY MANAGEMENT PLAN
CNR-PLN-VRG-OHSMP-001
SEPTEMBER 2023
(Rev.01)



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ABBREVIATIONS/DEFINITIONS

OCCUPATIONAL ACCIDENT: Undesirable events that cause death, illness, injury, damage or other losses.

RESEARCH: activities or he activities linked to the results, planned the arrangements suitability, and the regulations effective a way that applied, the organization's policy and its objectives to perform for appropriate is that to determine the order made systematic and examination.

CONTINUOUS IMPROVEMENT: Organization, OSH policy depends as, overall business health and safety performance improvement provides for OHS Management System development is a process.

DAMAGE: People injury, illness, property and / or worked in the place of damage seen or them together to realize why that might be potential sources or the cases.

LOSS DEFINITION: It is a project that introduces the description of the existence and characteristics of a loss.

INCIDENT: Accident causes that or accident causes will be the potential owner is incident.

RELATED PARTIES: Organization of OHS performance with interested or that the performance of the affected groups or are people.

INAPPROPRIATE: Direct or also indirectly as, injury, disease, the property damage is seen, who tried loss of vision or them together to realize why that might be the management system with the performance of, the laws, the procedures, the implementation, operation of the standard or the like no one is deviation.

OBJECTIVES: the organization to achieve for OHS performance strain imposed are intended.

OCCUPATIONAL HEALTH AND SAFETY: Factors and conditions that affect the welfare of employees, temporary workers, supplier staff, visitors and other people in the work area.

CONTRACTOR: Full service provided including maintenance, construction, facilities, security, cleaning, waste management and a range of other functions. Contract activities may include consultants, accountants, managers and other specialist service providers.

UNIT: With these Production Site, including but not limited to, Distribution Center, Regional Sales and Service Unit, BAK Unit, Directorate General VERGO as company units.



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LIST OF ABBREVIATIONS/DEFINITIONS

ADR	European Agreement Concerning the International Carriage of Dangerous Goods by Road
AFR	Accident Frequency Rate
ASR	Accident Severity Rate
CEO	Chief Executive Officer
COO	Chief Operating Officer
CSO	Customer Service Officer
EHS	Environmental, Health and Safety
ESAP	Environmental and Social Action Plan
ESS	Environmental and Social Standards
IFC	International Financial Corporation
ILO	International Labor Organization
JHSU	Joint Health and Safety Unit
MSDS	Material Safety Data Sheet
OHS	Occupational Health and Safety
OHS&E	Occupational Health and Safety & Environmental
OHSMP	Occupational Health and Safety Management Plan
PPE	Personnel Protective Equipment
TKYB	Development and Investment Bank of Turkey
VERGO	Vergo Enerji Sistemleri Sanayi ve Ticaret Anonim Şirketi
VOCs	Volatile Organic Compounds
WB	World Bank



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1. OBJECTIVE AND APPLICATION FIELD

This management plan is a revision of the document prepared for VERGO under Project No:20/015, dated February 2021. The previous management plan was prepared for the construction and operational phases. In this management plan, completed activities have been removed, and the ongoing operational phase has been included. Upon the request of the World Bank, revisions have been made to incorporate the improvements carried out by VERGO in accordance with the SAFEGUARD CORRECTIVE ACTION PLAN (SCAP) into the relevant sections.

The Occupational Health and Safety Management Plan ("OHSMP") has been prepared in line with Vergo Enerji Sistemleri Sanayi ve Ticaret Anonim Şirketi ("VERGO") policies, requirements of Environmental and Social Action Plan ("ESAP") developed by TKYB ("Bank") for the "Working Capital Financing" ("The loan") and regarding ESAP commitments of the Company, IFC Performance Standards, Turkish regulatory framework, WB General and relevant Sector Specific EHS Guidelines, and other applicable Good International Industry Practices.

1.1 Objective

This document describes the Occupational Health and Safety VERGO Management System. It defines clear requirements that a well-functioning organization will apply to ensure a safe and sustainable workplace for everyone.

1.2 Application Field

This plan is applicable and suitable for VERGO Energy Systems and any unit (R&D, Production, Maintenance, Sales and Service units) within the VERGO Site. In addition, individual units have local guidelines / explanations, procedures and instructions.



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2. ROLES AND RESPONSIBILITIES

2.1 Managing Director

- Owner and confirmatory of this plan,
- Ensures provision of adequate resources for implementation of this plan, and
- Controls and confirms implementation of this plan incorporating the managerial level.

2.2 Production Director

In the Facilities, Production Director directly reports to Managing Director. The OHS Team that is practically responsible for OHS-related issues and which comprises of individuals such as OHS Chief and OHS Specialist, is under Production Director. Therefore, as being in the leading position of the OHS Team, the roles and responsibilities of the Production Director are listed below:

- In collaboration with the Managing Director, provides adequate resources for the implementation of this plan,
- Ensures implementation of this Plan in accordance with Project Standards,
- Ensures provision of relevant trainings within the scope of this plan,
- Ensures review and update of this plan as required,
- Participates accident/incident investigation and root cause analysis practices whenever applicable.
- Ensures compliance of subcontractors and service providers to this Plan's requirements.

2.3 Production Chiefs

Production Chiefs have fundamental and broad practical experience regarding OHS risks of manufacturing processes and practices. Therefore, they have responsibility for providing active and efficient support to OHS Team and Production Director in compliance with requirements of this Plan. Besides, Production Managers specifically;

- Evaluate workplace and manufacturing activities from the aspects of OHS and report relevantly identified shortcomings / non-compliances / risky situations to OHS Team and Human Resources Director.
- Shutdown relevant manufacturing process in case of an identification of health and safety threatening situation,
- Participate in accident / incident investigation and root cause analysis practices whenever applicable
- Participate and ensure participation of manufacturing personnel in the relevant trainings identified in this Plan.

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2.4 OHS Team¹

- Implements this Plan and updates it whenever necessary,
- Ensures Facility operations are carried out in accordance with this Plan's requirements,
- Ensures realization of OHS related internal audits / controls, identification of possible shortcomings / non-compliances, and implementation of relevant corrective actions,
- Participates and mostly leads accident / incident investigation and root cause analysis practices,
- Controls and audits the compliance of subcontractors and service providers to this Plan's requirements,
- Keeps all kinds of records relevant to this Plan,
- Follows legislative requirements applicable to this Plan,
- Ensures realization of monitoring requirements of this Plan,
- Provides and/or arrange provision of trainings within the scope of this Plan, and
- Reports to Human Resources Director on the issue of OHS performance and performance of the implementation of this Plan,

2.5 Occupational Physician

- Contributes to the implementation of health precautions and practices presented in this Plan,
- Participates in accident / incident investigation and root cause analysis practices,
- Provides occupational health specific trainings, and
- Cooperates with OHS Team within the scope of implementation of this Plan.

2.6 Employee Representatives

Employee representatives are also employees as a matter of course, therefore, the responsibilities detailed in Section 2.7 are naturally applicable for them. Besides, within the scope of their employee representative roles, they;

- Convey OHS related information / grievances / complaints provided by employees to Production Director and/or OHS Team,
- Convey OHS related decisions provided by Production Director and/or OHS Team to employees,
- Attend specific trainings designated for them, and
- Convey hazards and risks identified by employees to Production Director, OHS Team, Occupational Physician and Production Chiefs accordingly.

2.7 Employees

- Participate in relevant trainings designated for them in this Plan,
- Follow the OHS precautions and rules, and
- Report hazards, risks, and dangerous behaviors to their supervisors.

¹ The OHS Team applicable for this Plan comprise of OHS Chief and OHS Specialist



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2.8 Subcontractors and Service Providers

- Ensure compliance with the OHS management approach defined in this Plan in accordance with the contractual requirements,
- Ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan, and
- Provide relevant OHS performance data to OHS Team.

2.9 Visitors

- Comply with all reasonable safety directions provided by VERGO,
- Take care for their own health and safety and for the health and safety of others as practically reasonable, and
- Report all incidents / accidents that they witnessed to VERGO personnel.



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3. OCCUPATIONAL HEALTH AND SAFETY

At VERGO, with our approach and understanding that is sensitive to society, our employees and the environment; we aim to realize our productions with zero work and environmental accidents by making our investments in people, knowledge and technology. QUALITY-ENVIRONMENT-OHS Policy.

With this belief;

- Creating and announcing the OHS Policy
- Providing healthy and safe working conditions to prevent work-related injuries and / or health deterioration
- Suitable for our purpose and context, supporting OHS risks and opportunities and our
- Commitments to eliminate hazards and reduce OHS risks
- Commitments to fulfill legal and other requirements
- Consultation with employees and commitments to ensure their participation
- Including commitments for the continuous improvement of the OHS management

Our OHS policy has been established, employees who are computer users have been reached through the server, announced to other employees by hanging them on the boards, and have been informed and implemented through trainings. It was published on www.vergo.com.tr for other stakeholders.

3.1 Our Occupational Health and Safety Policy

- **Compliance with the laws and 2nd regulations in our company;**

With the participation of our employees, we undertake to comply with the applicable OHS laws and regulations and the standards of the organizations we are a member of.

- **Our managers and employees are responsible for OHS;**

In order for our employees to be aware of their individual OHS responsibilities, necessary training will be provided, and it will be ensured that they become aware and aware.

- **Hazards will be detected and possible risks will be avoided;**

We undertake that the necessary resources will be allocated to ensure the detection and control of hazardous and potential risks in our organization, and that a healthy and ergonomic working environment will be provided by conducting studies to prevent all kinds of work accidents, injuries and occupational diseases.

- **OHS. Our performances will be evaluated;**

With the careful work of all our employees, it is aimed to reduce the OCCUPATIONAL ACCIDENTS, INJURIES and OCCUPATIONAL DISEASES to zero.



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3.2 Occupational Health and Safety Management

Occupational health and safety hazards and risks relevant to the Facility operations include common (i.e., common for most of the manufacturing facilities) ones such as electrical hazards, hazards related with manual handling, traffic related risks etc. and process / sector specific ones such as;

- Physical injuries such as crushed body parts from metal forming operations,
- Cuts, abrasions, and puncture wounds from metal cutting tools and machines,
- Exposure to VOCs from painting operations,
- Exposure to high temperatures and unsafe levels of noise, and
- Exposure to metal dust and fumes.

In this section, measures, practices, implementations and managerial actions to eliminate, or whenever not possible, to reduce these occupational risks and impacts are presented in relevant sub-sections.

3.3 Occupational Health and Safety Risk Assessment

Occupational Health and Safety risk assessment implementation and details of the implementation are defined by the Risk Assessment Procedure of VERGO. According to the procedure, which is in line with the Project Standards requirements, the risk analysis and relevant assessments shall be reviewed and updated whenever;

- Moving facilities or changes in the buildings.
- Changes in the technology, materials and equipment used in the facilities.
- Changes in the production method.
- Occurrence of work accident, occupational disease or near miss.
- There is a legislative change regarding the limit values of the working environment.
- When necessary according to the results of workplace measurement and health surveillance.
- Every 4 years when a new hazard arises from outside the workplace and may affect the workplace.
- Periodically every 4 years.

After identification and assessment of the risks, below mentioned risk management / control hierarchy shall be used:

- Elimination of the hazards - physically removing the source of the hazard.
- Substitution of the hazards – replacing the hazard by using less dangerous processes, operations, materials or equipment.
- Engineering Controls – isolating workers from the hazard by using engineering controls.
- Administrative Controls – changing the way people work, for instance, limiting the time a worker is exposed to a hazard.
- PPE – as the least efficient and final option; usage of adequate and appropriate PPE.

In the current situation, risk assessment documents are up to date as of the date of May 2023. The risk assessment documents have been prepared for determination occupational health and safety hazards and risks, including risks related with the Covid-19 outbreak, and identification of relevant measures for the activities carried on below workplaces / departments / sections:



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- Pipe and Profile Machines
- Tape Slitting Machines
- Straightening and Deburring Machines
- Crowbar Machine
- Roll Hall
- Shipping and Product Stacking Areas
- Office
- Pressure Tubes and Vessels
- External factors
- Electrical Maintenance Workshop
- Non-Operational Areas
- Mechanical Maintenance Workshop
- Infirmary
- Sheet Metal Cutting Machines
- Band Circular Saw Machines
- Social facilities
- Machining Workshop
- Saw Sharpening Machine

3.4 Emergencies

The possible emergency situations that may arise during Project activities -which may directly be relevant to the Project activities or may arise due to natural disasters - are presented below:

- Fire,
- Earthquake,
- Flood,
- Chemical Spillages / Leakages,
- Occupational Accidents,
- Covid-19 Related Emergencies

3.5 Personal Exposure and Workplace Environment Measurements

The personal exposure and workplace environment measurements are required to be performed periodically as per risk analysis and assessment reviews and updates. And its objectives are;

- Ensure that the health of the workers is efficiently protected,
- Ensure that the preventive actions which have been taken are still effective,
- Ensure that the levels, as measured previously, remain unchanged or fall,
- Ensure that any changes made in manufacturing processes or work practices will not lead to an excessive exposure to hazardous chemicals, and
- Promote the implementation of more efficient preventive measures.



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3.6 Application

- The weekly field visit hours to be conducted by the OHS expert assigned by the JHSU (Joint Health and Safety Unit) for VERGO company should be arranged as follows:
 - At least 4 days per week, with each visit lasting a minimum of 5 hours.
 - The calculated visit hours must not fall below the legal requirement. In the event that the condition stated above falls below the legal limit, it must be promptly updated.
- In addition to legal requirements, support for the enhancement of OHS management practices will be provided through the recruitment of a full-time OHS specialist with sufficient qualifications, skills, and experience within the Company.
- All personnel working in VERGO Energy Systems and the VERGO Site are obliged to comply with all occupational safety rules determined by laws and procedures, to use the personal protective equipment given to them according to the specified methods and to wear work clothes.
- All sequential department supervisors are primarily responsible for ensuring that the work carried out in their areas of responsibility is carried out under safe conditions, supervising, stopping the work when necessary, and performing corrective actions.
- Basic Occupational Health, Occupational Safety, Environmental Awareness and Management of Environmental Activities and Basic Fire Safety Training, which includes general occupational health and safety, environmental principles, fire safety and practices on this subject in VERGO field, workplace environment risks, for every new personnel and interns, VERGO The OHS Team in Energy Systems is given by Class B Occupational Safety Specialist at İş Medikal JHSU.
- In the event that the risk or regulation that is the subject of the warning sign disappears by supplying all kinds of warning signs in the department and placing them in appropriate places, it is the responsibility of the operating authority to remove this sign and send it to the Material Warehouse.
- The relevant business manager and the OHS Board decide together on the format of the plates and signs in VERGO Energy Systems, they are hanged at the places deemed appropriate by the decision
- VERGO Energy Systems Business sin also duly periodic check of course all kinds of machinery and equipment (fire equipment, ventilation systems, pressure vessels / tanks, winch, electro cranes, hoists, hoist, man lifts, personnel and cargo elevator, forklift periodic checks are made by all relevant departments in accordance with the legislation. A copy of the forms in which these controls are recorded are filed in the company official, the original in the OHS Unit or the relevant department. The follow-



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up responsibility for the completion of the deficiencies identified in these controls rests with the management.

- Work Equipment and Fire Installation at the VERGO Site are periodically inspected by the Occupational Safety Specialist and the report results are kept.

3.7 Personal Protective Equipment

- Protective equipment is constantly used at work according to the current risks and the work done.
- In addition to the equipment specified in the work area, each personnel uses personal protective equipment announced with a warning sign to enter that area, as long as they are in another field. In case of entering the field without these protective equipment, the operator will warn this personnel and have their protective equipment installed or send them outside the field.
- During their internship in the factory, the students are under the supervision and control of the business manager they do internship with, and the company provides the same personal protective equipment as the business personnel doing the same job, and the interns have to use the personal protective equipment provided.
- The PPE that should be used on the basis of departments in all enterprises were determined by the HSE directorate together with the company officials and announced as a PPE matrix at the entrances of the enterprises and in them. The department in need of a new personal protective equipment for any reason other than the PPEs included in this list and required to be used, applies to the OHS Unit with a letter stating the conditions and risks in which this personal protective equipment will be used.
- Personal protective equipment samples are provided by the OHS Unit in accordance with the request.
- Employees who continue not to wear their personal protective equipment despite verbal and then written business warnings are sent to the Disciplinary Board by the relevant directorate.
- Guests (visitors) are prohibited from entering the business premises. When necessary, visitors can enter the business area provided that they use personal protective equipment suitable for the section they will visit and have a companion with them. All guests coming to VERGO Energy Systems facilities for business or visit are stopped by the security at the door, their identities are recorded and a visitor brochure is given to them. At the VERGO Construction Site, it is allowed to make the relevant visit accompanied by a staff member deemed appropriate by the OHS Specialist.



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3.8 Occupational Health and Occupational Safety Board

- VERGO Energy Systems occupational health and safety works are carried out by the Occupational Health and Safety Board in accordance with the law no 6331 and the relevant regulation.
- The Occupational Health and Safety Board consists of the following members to operate in accordance with the regulations and gathers everyone / two months.
 - Employer or employer representative
 - Occupational safety specialist
 - Workplace doctor
 - A person in charge of managing human resources, personnel, social affairs or administrative and financial affairs,
 - Civil defense specialist, if available
 - Foreman, foreman or master, if available
 - Employee representative, in case there is more than one employee representative in the workplace, the chief representative.
- In VERGO Energy Systems Enterprise, the department manager communicates the occupational health and safety problems in his department to the OHS Unit in written form via his Directorate.
- After the minutes of the Occupational Health and Safety Board meeting in VERGO Energy Systems Plant are signed by the members, the originals are archived in the OHS Unit. It is sent to all computer users via e-mail and a copy of each is posted on the notice board in the business areas. It is also written in the notarized OHS Decision Book.
- The OHS Unit at VERGO Energy Systems operation and the Occupational Safety specialist at the VERGO Site are responsible for the execution of the Occupational Health and Safety Board in accordance with the regulations.

3.9 Written Work Permits (High Risk-Requiring Work Permit)

VERGO Energy Systems Business and VERGO Worksite routine production in the field except (non-secure operating instructions) all work to be done, the people on the basis of risk assessments and written work permit system is done without harming the environment and factory.

3.9.1 Hot Works Operation

Fire work special permit form [see Annex-2 (F064)] is used in order to prevent fires and explosions that may occur when tools that can cause sparking in businesses and other areas in VERGO Energy Systems Plant when open flames are used or when these tools are taken to an environment with flammable chemical.

The work permit must be filled in before any work such as welding, grinding, burning, cutting, hot soldering, drill work, heat treatment and motor vehicle entry that may produce spark welding.



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3.9.2 ***Studies in Confined Areas***

The permit form is used in the works performed in completely closed areas with limited entrance areas such as storage tanks, channels, tankers, process vessels and boilers and in places with only one entrance where exit is difficult, such as channels, tunnels and pipelines deeper than 1.5 meters.

3.9.3 ***Works to be Made in Energy Facilities***

Jobs that require contact with energized conductors, terminals or parts or work very closely are called working in energy facilities. It is necessary to use a permission form for these works.

3.9.4 ***Studies in High Places***

All work done in high places is called Work at Height.

Work permit must also be filled in these works to be carried out with temporary equipment such as temporary platforms, piers, mobile-lifting work piers, personnel and load elevators, suspended cradles, step ladders and bridges.

Things moment risk assessment results in places with potential fall hazards, high operating rules apply. In this case, a permit must be obtained with the special permit form [see Annex-2 (F067)] for working at high and low positions.



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4. MANAGEMENT OF ACCIDENTS / INCIDENTS AND NEAR MISSES

The general flow and steps to be followed in case of an accident / incident and near miss investigation and aftermath are presented below:

4.1 Accident Investigation and Reporting

Investigation is necessary to prevent the accident from reoccurring. The aim of the process is to identify the main and administrative consequences of the accident by evaluating the relevant factors and evidence by the investigation team. The process consists of the following steps:

- In case of an occupational accident, "Work Accident Report Form" is filled by the first supervisor of the casualty in line with the statements of the witnesses and their respective supervisors and the OHS Specialist is informed.
- In case the accident occurs during night shifts, the relevant form will be filled by the Shift Supervisor and the OHS Specialist will be informed in the morning of the same day.
- If the casualty first goes to the health unit for first aid, the necessary information will be given to the first supervisor by the Health Officer. In cases where the casualty's supervisor cannot be reached and urgent referral is required, the health unit will inform the security personnel to inform the relevant supervisor.
- First of all, information about the casualty (name, surname, age, duty, working time until the accident) and information about the accident (place, date, shift, accident machine / department) are written in the form.
- The formation of the cauldron is explained in detail.
- The form is signed by the casualty's relevant superiors and the witness(s).
- The completed form is sent to the OHS Specialist.
- One copy of the OHS Specialist "Work Accident Report Form"; It forwards it to the Chief of Personnel & Administrative Affairs and the Operations Directorate.
- The way the accident occurred and the place of the accident are examined, and the causes of the accident are determined by the accident investigation team (consisting of the OHS Specialist, Related Department Supervisor and Maintenance Officer) and recorded in the "Occupational Accident Investigation Form".
- On the day the casualty returns to work, the OHS Specialist fills in the "Occupational Accident Declaration Form" to obtain detailed information about the occurrence of the accident.
- Occurring accidents are reported to the Regional Labor Directorate by the Personnel and Administrative Affairs Chief within 3 working days at the latest, with the "Workplace Occupational Accident Notification Form".
- Persons responsible for the measures and actions to be taken in relation to the Accident are followed up by the OHS Specialist by writing to the "Improvement Form".
- The results of the opened improvement forms are reviewed and followed up at the Factory Weekly meetings and OHS&E board meetings.
- All these forms are archived by the OHS Specialist in the victim's file.
- Following the completion of all reports regarding the accident, a final report is prepared by the OHS Specialist and the relevant units are informed.

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4.2 Near Miss Reporting

- After an incident, when no injuries or environmental pollution has occurred, but if no precautionary or corrective action is taken, situations/incidents that may cause an accident or cause environmental pollution that may require medical attention are reported with the "Near Miss Form".
- Persons and/or persons who have witnessed or experienced any of the above-mentioned situations fill out the form and hand it over to the OHS Specialist or put it in the "Near Miss" boxes.
- These filled forms are examined by the OHS Specialist and the necessary improvement works are determined.
- In case the improvement activities are of project size, they are brought to the OHS&E committee and discussed.

4.3 Assessment

All these Accident and Near Loss reports will form one of the agenda items of the OHS&E Board. In addition, the causes and results of accidents will be shared with the employees by reporting monthly and annual periods.

Events encountered during an accident or near loss will be evaluated, and if necessary, the effectiveness of risk assessments and environmental impact assessments will be discussed and revisions will be made.

After every workplace accident, Root Cause Analyses are conducted. The behavior or condition that caused the accident is identified.

If the "Condition" is the cause of the accident, improvement measures are implemented within the company to eliminate the hazard. If the cause of the accident is "Behavior," training sessions are reiterated to prevent the recurrence of incorrect behaviors.

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5. TRAININGS

Basic Occupational Health and Safety Training for the employees working at VERGO Energy Systems Factory will be provided by the OHS Unit.

Training to be given Training Procedure within the scope of Educational Process Flow Diagram in accordance with the Annual Training Plan is prepared.

The main topics of these trainings are:

VERGO Energy Systems Business;

- Information on labor legislation,
- Legal rights and responsibilities of employees,
- Workplace cleanliness and order,
- Biological and psychosocial risk factors,
- Disease prevention principles,
- First aid,
- Causes of occupational diseases,
- Damages of tobacco products,
- Fire protection,
- Evacuation and Rescue,
- Safe use of work equipment,
- Safety and Health Sign
- Electrical dangers and risks
- Use of Personal Protective Equipment
- Pandemic Covid-19 and similar communicable diseases

Informational training sessions on WB Standards should also be added to the training plan and provided regularly as part of the training program.

In addition, following each workplace accident, an informative training session will be conducted for all employees, encompassing the insights obtained from the root cause analysis of the accident. Furthermore, employees who have experienced workplace accidents will receive pre-job training and specific training related to the causes of the accidents before resuming their duties.

5.1 Audits and Inspections

The audits and inspections within the scope OHS and related issues can generally be grouped into two; (1) the ones embedded in other OHS practices and implementations, for instance, technical inspection of work equipment with the purpose of control / maintenance or Risk Assessment Team's inspections with the purpose of identification of hazards and risk, and (2) the ones that shall be performed under normal conditions and periodically. In this section, details of the latter one are presented.

5.1.1 Daily Site Inspections

Daily site inspections shall be performed by Internal Auditors. Internal Auditors are workers designated to each production line, section, department etc., who are trained by OHS Team



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with the purpose of continuously inspecting and controlling the workplace environment and workers' behaviors within the scope of safety during daily routine. In case of identification of an unsafe situation and/or behavior, Internal Auditors have specific responsibilities to warn others and to inform the OHS Team.

5.1.2 Weekly and Monthly Site Inspections

Weekly and monthly site inspections shall be performed by OHS Team with the purpose of identification of possible hazards, risks, unsafe conditions and behaviors.

5.1.3 External Audits

External audits shall be performed every six months by the independent consultancy company to inspect and monitor the implementation of this OHSMP, as well as the Environmental and Social Management Plan.

5.2 Record Keeping

OHS management records shall be consist of the below but not limited to:

- Accident / Incident investigation and root cause analysis records,
- Emergency drill records,
- Records of weekly and monthly site inspections,
- Records of control and maintenance of work equipment,
- Records of risk analysis and evaluation studies,
- Records of the workplace environment and personal exposure measurements,
- Records of corrective & preventative actions identified through various OHS practices, such as risk analysis and evaluation, emergency drills, site inspections, accident / incident investigation and analysis etc.
- Records of corrective & preventative actions identified through routine Covid-19 inspections.
- Records of trainings,
- Records of meetings.

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6. MONITORING AND REPORTING

The Table 1 details the monitoring activities identified for OHS management issues of the facility.

Performance on the topics and issues identified in Table 1 together with the relevant records and results shall be provided to the General Manager and as well as to the Bank every six months.



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Table 1. Occupational Health and Safety Plan Monitoring Table

ID	Topic	Measure / Monitoring Parameter / Target	Performance Indicator / Target	Monitoring Location	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
OHSMP-1	Root Cause Analysis	Taking corrective and preventative measures through investigation and root cause analysis of accidents / incidents	Zero lost day	All sections / departments / production lines	<ul style="list-style-type: none"> Records of investigation and root cause analysis ASR calculation AFR Calculation via 	<ul style="list-style-type: none"> Once a month After the accidents/incidents 	OHS Team
OHSMP-2	Near miss	Increasing OHS awareness by encouraging more near miss notification.	Increasing monthly number of near miss notifications month by month.	Project Site	Near miss records	Once a month	OHS Team
OHSMP-3	Trainings	Provision of Basic OHS related trainings	100 % completion of each OHS training within their respective period	Project Site	Records of trainings and certificates	<ul style="list-style-type: none"> Once a month At the onset of new employments 	OHS Team
OHSMP-4	Trainings	Providing Training on WB Standards	Raising Awareness on WB Standards	Project Site	Annually Training Plan and training records	Annually	OHS Team
OHSMP-5	Trainings	Workplace Accident Awareness Training	Eradicating or Minimizing Hazards Leading to Workplace Accidents	Project Site	Training Records	<ul style="list-style-type: none"> After the accidents/incidents Customized Approach for Return-to-Work of the Injured Employee 	OHS Team
OHSMP-6	Meetings	Conducting OHS related meetings	Performing 100 % of each OHS meeting within their	Project Site	Minutes of meetings	Once in two months	OHS Team

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ID	Topic	Measure / Monitoring Parameter / Target	Performance Indicator / Target	Monitoring Location	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
			respective period				
OHSMP-7	Risk Analysis	Performing risk analysis and evaluation for identification of hazards and elimination of risks.	Performing risk analysis and evaluation for all departments annually.	All sections / departments / production lines.	Risk Analysis Reports	<ul style="list-style-type: none"> At least once every two years After each workplace accident or whenever needed 	Risk Assessment Team
OHSMP-8	Emergencies	Conducting emergency drills.	Providing Information on Emergency Situations	Project Site	Drill records	Annually	OHS Team
OHSMP-9	Emergencies	Preparation of Emergency Action Plan	Providing Information on Emergency Situations	Project Site	Emergency Action Plan	<ul style="list-style-type: none"> At least once every two years Whenever needed 	OHS Team
OHSMP-10	Corrective and Preventative Actions	Implementation of corrective and preventative actions identified through; <ul style="list-style-type: none"> Near miss investigation & root cause analysis, Accident / incident investigation & root cause analysis, Risk analysis and evaluation, Emergency drills, Audits and inspection. 	Closing 100 % within each quarter	Project Site	Relevant records	<ul style="list-style-type: none"> Once six months 	OHS Team
OHSMP-11	Audits and Inspection	Implementation of Daily, Weekly, and Monthly Basis	Completing Comprehensive Site Inspections on	Project Site	Audit records	<ul style="list-style-type: none"> Daily, Weekly, 	OHS Team



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ID	Topic	Measure / Monitoring Parameter / Target	Performance Indicator / Target	Monitoring Location	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
		Site Inspections	a Daily, Weekly, and Monthly Basis			<ul style="list-style-type: none"> Monthly 	
OHSMP-12	Corrective and Preventive Measures for Communicable Diseases such as Covid-19	Implementation of Corrective and Preventive Actions Identified through Inspections of Routine Control for Communicable Diseases like Covid-19	Closing 100% within each week	Project Site	Relevant records	<ul style="list-style-type: none"> Whenever needed 	OHS Team

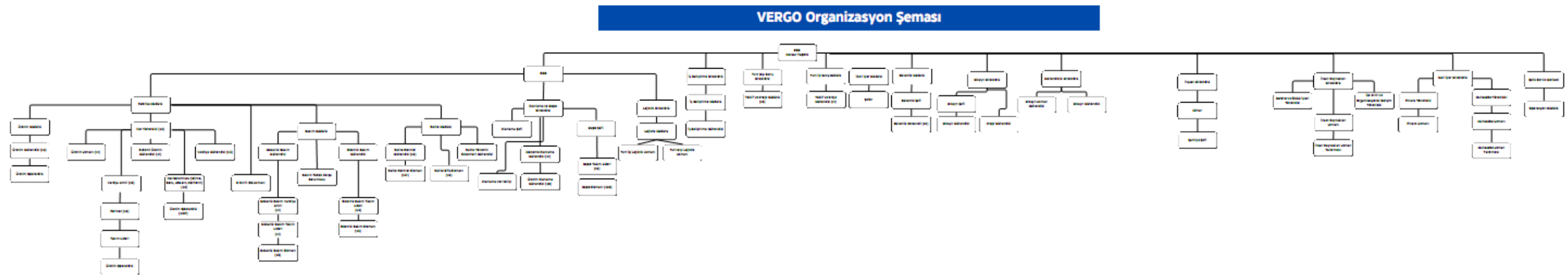
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7. REVIEW AND UPDATE

This Plan is a living document, and responsibilities, procedures, and compliance actions should be updated as needed. Understanding its contents fully, providing relevant training to the staff, and ensuring the implementation of procedures in alignment with this Plan are the responsibilities of the OHS Team and the OHS personnel of subcontractors.



ANNEX-1



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Name	-	TASK	e-mail	Telephone
NEVZAT TAŞKIN	VERGO	CEO	nevzat.taskin@vergo.com.tr	5327140425
MERT EMİRBAYER	VERGO	COO (Chief Operating Officer)	mert.emirbayer@vergo.com.tr	5498035568
SELİM ALTINMAKAS	VERGO	Factory Manager	selim.altinmakas@vergo.com.tr	5498040562
MURAT BULDU	VERGO	Production Manager	murat.buldu@vergo.com.tr	5362839714
BESTE TAŞKIN	VERGO	Business Development Director	beste.becerik@vergo.com.tr	5425351014
HANDE UNAN	VERGO	International Sales Director	hande.unan@vergo.com.tr	5498149823
CANAN ÖZANT ERGİN	VERGO	Domestic Sales Director	canan.ergin@vergo.com.tr	5498149819
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ERSOY KAKAÇ	VERGO	Security Manager	ersoy.kakac@vergo.com.tr	5398541927
CEM AKTAŞ	VERGO	Design Manager	cem.aktas@vergo.com.tr	5498065973
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ÇAĞRI GÖZER	VERGO	Design Chief	cagri.gozer@vergo.com.tr	5395182539
MEHMET MÜFTÜOĞLU	VERGO	Construction Director	mehmet.muftuoglu@vergo.com.tr	5318857998
MEHDİ DEMİRCİ	VERGO	Design Manager	mehdi.demirci@vergo.com.tr	5498257790
İLKAY ADINIR	VERGO	Human Resources Director	ilkay.adinir@vergo.com.tr	5396417820
ALİ KARAOĞLAN	VERGO	Financial Affairs Director	ali.karaoglan@vergo.com.tr	5498132316
ERSİN TANIŞIK	VERGO	CSO (Customer Service Officer) Sales Manager	ersin.tanisik@vergo.com.tr	5498132183
OZAN ÖZVATAN	VERGO	Line Manager	ozan.ozvatan@vergo.com.tr	5396454028
SAMET ATALAY	VERGO	Line Manager	samet.atalay@vergo.com.tr	5396360874
BİLGİN ER	VERGO	Maintenance Manager	bilgin.er@vergo.com.tr	5398541929




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Name	-	TASK	e-mail	Telephone
OLCAY BAKAN	VERGO	Quality Manager	olcay.bakan@vergo.com.tr	5465017865
GİZEM TUNÇ	VERGO	Planning and Warehouse Director	gizem.tunc@vergo.com.tr	5396417831
UĞUR KARACA	VERGO	Planning Chief	ugur.karaca@vergo.com.tr	5497930510
YUSUF ÜNAL	VERGO	Warehouse Chief	yusuf.unal@vergo.com.tr	5396360871
BURAK GÜRAĞAÇ	VERGO	Logistics Director	burak.guragac@vergo.com.tr	5497930503
GÖKHAN SEVER	VERGO	Logistics Manager	gokhan.sever@vergo.com.tr	5318858003
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EREN GÜLTEKİN	VERGO	Technical Office Manager	eren.gultekin@vergo.com.tr	5318858019




ANNEX-2

Examples of written work permit forms (High-Risk Work Permit) referred to in Section 3.9 have been provided.

		ATEŞLİ ÇALIŞMA ÖZEL İZİN FORMU		
İzin Verilen Ünite : Üniteye Çalışılacak Yer : Yapılacak İşin Tanımı : İşin Başlama Saati : İşin Bitiş Saati : İzin : den 'e kadar yürürlüktedir.				
ALINACAK ÖNLEMLER		Evet	Hayır	Gerek Yoktur
1	Saha yanıcı maddelerden temizlenmiştir.			
2	Etrafta yanıcı malzemeler yoktur.			
3	Cihazlar uygun tarzda kısıtlanmış ve test edilmiştir.			
4	Cihazlar uygun tarzda havalandırılmıştır.			
5	Bir alt kat veya diğer bölümlere kıvılcım sıçramaması için önlem alınmıştır.			
6	Saha ve cihazlarda gaz kontrolü yapıp gazsız bulunmuştur.			
7	Kaynak yapılacak mahale yangın hortumu serilmiştir.			
8	Yangın söndürme cihazları kullanmaya hazır durumdadır.			
9	Koruyucu malzeme kullanılmaktadır.			
Ünite Yetkilisi Adı Soyadı: İmzası:				
ÖZEL TALİMATLAR : 1- 2 - Bir yangın ihbarı olduğunda kaynakçının veya YANGIN EKİBİNİN kaynak yerinden ayrılması ancak, çalışan yerde gereken kontroller yapıp tehlike bulunmadığı saptandıktan sonra olabilir. İş GÜVENLİĞİ UZMANI : İş kontrol edilmiş ve izin verilmiştir. Adı Soyadı : İmzası :				
ÖĞLE TATİLİ : Aynılma Saati : Başlama Saati : İşin : Bitiş saati : İzin süresi sona ermiştir. Kaynak işini yapan Ben: Tüm aletlerimi topladım, imza: Birim Yetkilisi olarak Ben: Kaynak yapılan yerde son iş bitiminden 30 dakika sonra sahayı kontrol ettim. İmza :				

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	YÜKSEKTE-ALÇAKTA ÇALIŞMA ÖZEL İZİN FORMU
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Çalışma Yapılacak Yer:		Çalışmanın Amacı:		
Tarih ve süresi:		İzni Veren		
Çalışacak Kişi(ler):	Ad-Soyad	İm Ad-Soyad	İmza	
ALINACAK ÖNLEMLER		EVET	HAYIR	GEREKMİYOR
1	Çalışma için kullanılacak olan seyyar merdivenler standart ürünler mi?			
2	*Tahta merdivenler, kaynaklanmış, elde yapılmış merdivenler kullanılamaz.			
3	Çalışma alanının altındaki veya üstündeki geçiş ve diğer çalışmalar sınırlandırıldı mı?			
4	Paraşüt tipli emniyet kemeri ve Ekipmanları (Yatay Yaşam Hattı, Dikey Yaşam Hattı, Laynard, Karabina, Düşmeyi durdurma ekipmanı vb.), verildi mi?			
5	Emniyet kemerinin bağlanacağı sağlam bağlanıp noktası (ankraj noktaları) veya çalışma halatları bağlandı ve belirlendi mi?			
6	Baret, gözlük, emniyet ayakkabısı, eldiven verildi mi?			
7	Aydınlatma yeterli mi?			
8	Çalışma sırasında kullanılacak olan cihazlar ve malzemeler yapılacak işe uygun mu?			
9	Kullanılacak cihazların elektrik tesisatı, topraklamaları uygun mu?			
10	Kullanılacak cihazların koruyucuları takılı vaziyette mi?			
11	Çalışma yapılan makine/teçhizatın enerjisi kesildi mi?			
12	* Yeniden enerji verilmesi ihtimaline karşın kilitleme/etiketleme yapılmalıdır.			
13	Çalışma alanına erişmek için kullanılacak olan vinç, lift, iskele, platform, merdiven gibi araçların bakım ve kontrolleri tam mı?			
14	Erişim araçları devrilmeye karşı korunmuş mu?			
15	Yüksekte çalışma yapacak kişi(ler) eğitilmiş ve sağlık durumları uygun mu?			
16	Derinde yapılan çalışmalarda çalışan kişinin acil durumda kurtarılabilmesi için vinç/makara sistemleri takılı ve hazır mı?			
17	Çalışma sırasında açılacak olan çukurların etrafına uyarı şeritleri ve bariyerleme yapıldı mı?			
18	Ateşle çalışma yapılacaksa Ateşle Çalışma İzin Formu uygulandı mı?			
19	Çalışma kapalı ortamda yapılacaksa Kapalı Alan Çalışma İzin Formu uygulandı mı?			
<p><i>! 1,5 metreden itibaren, etrafında tamamen koruma sağlayan korkuluk sistemi olmayan her noktadaki çalışma bu izne tabidir. Vinç gibi kaldırma araçlarında veya iskelelerde yapılan çalışmalarda emniyet kemeri ankraj noktası vinç veya iskelenin kendisi olamaz. Ankraj noktaları sabit ve sağlam noktalar olmalıdır. Yanım parmak borular ankraj noktası olarak seçilemez. Çalışma sırasında kemere bağlanabilecek uzatma halatları, çalışma yüksekliğine uygun olmalıdır. Tüm koşullar emniyetli hale getirilmeden işe başlama izni verilemez. Rüzgarlı ve yağışlı zamanlarda yüksekte-derinde çalışmalar yapılamaz. Verilen izne uygun hareket edildiği iş süresince kontrol edilmelidir. İş bitiminde izni veren kişi tarafından çalışma alanı kontrol edilerek ortamın temiz ve engelsiz halde bırakıldığı, açılan kapak veya koruyucu varsa kapatıldığı kontrol edilmelidir. Bu izin formu çalışacak kişiler tarafından da imzalanarak alınan tedbirlerle riayet edilir. Form, izni veren kişi tarafından saklanır.</i></p>				

Form no:F067.00/13.04.2016-13.04.2016