



REPUBLIC OF TÜRKİYE  
MINISTRY OF TRANSPORT  
AND INFRASTRUCTURE

**AYGM**  
Altyapı Yatırımları Genel Müdürlüğü

**ÇINAR**  
ENGINEERING  
CONSULTANCY INC.



# ISTANBUL NORTH RAIL CROSSING PROJECT (INRAIL)

Labor Management Procedures

CNR-AYGM-INRAIL-LMP

Final

January 2026

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page i / iii



**Bağlıca Mah. Çambayırı Cad. Çınar Plaza No:66/5 06790 Etimesgut/ ANKARA**

**Tel: +90 312 472 38 39 Fax: +90 312 472 39 33**

**Web: [cinarmuhendislik.com](http://cinarmuhendislik.com)**

**E-mail: [cinar@cinarmuhendislik.com](mailto:cinar@cinarmuhendislik.com)**

**All rights of this report are reserved.**

All or part of this report cannot be reproduced, copied, electronically reproduced, traded, transmitted, sold, rented, used for any purpose, or used in any form and method in digital and/or electronic media without written permission from Çınar Engineering Consultancy Inc. as per the Law No. 5846 on Intellectual and Artistic Works amended with the Law No. 4110.

## TABLE OF CONTENTS

<b>TABLE OF CONTENTS</b> .....	<b>ii</b>
<b>ABBREVIATIONS &amp; DEFINITIONS</b> .....	<b>iii</b>
<b>1 OVERVIEW OF LABOR USE ON THE PROJECT</b> .....	<b>1</b>
1.1 Number of Project Workers .....	1
1.2 Characteristics of Project Workers .....	1
1.3 Timing of Labor Requirements .....	2
<b>2 ASSESSMENT OF KEY POTENTIAL LABOR RISKS</b> .....	<b>3</b>
2.1 Project Activities .....	3
2.2 Key Labor Risks.....	3
<b>3 LEGAL AND POLICY FRAMEWORK</b> .....	<b>6</b>
3.1 Brief Overview of Labor Legislation: Terms and Conditions .....	6
3.2 Brief Overview of Labor Legislation: Occupational Health and Safety .....	12
3.3 World Bank Requirements .....	17
<b>4 RESPONSIBLE STAFF</b> .....	<b>19</b>
4.1 AYGM PIU .....	19
4.2 Construction Supervision Consultant .....	20
4.3 D+B Contractor(s).....	20
<b>5 POLICIES AND PROCEDURES</b> .....	<b>22</b>
5.1 Monitoring and Reporting .....	26
<b>6 AGE OF EMPLOYMENT</b> .....	<b>28</b>
<b>7 TERMS AND CONDITIONS</b> .....	<b>29</b>
<b>8 WORKERS GRIEVANCE MECHANISM</b> .....	<b>31</b>
8.1 Sexual Exploitation and Abuse / Sexual Harassment .....	32
<b>9 CONTRACTOR MANAGEMENT</b> .....	<b>34</b>
<b>10 PRIMARY SUPPLY WORKERS</b> .....	<b>35</b>
<b>Annex-1 Location of the Project</b> .....	<b>1</b>
<b>Annex-2 Sample Code of Conduct</b> .....	<b>2</b>

## ABBREVIATIONS & DEFINITIONS

<b>ATP</b>	Automatic Train Protection
<b>AYGM</b>	Directorate General of Infrastructure Investments
<b>CAP</b>	Corrective Action Plan
<b>C-ESMP</b>	Contractor's Environmental and Social Management Plan
<b>CoC</b>	Code of Conduct
<b>CSC</b>	Construction Supervision Consultant
<b>D+B</b>	Design and Build
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EHS</b>	Environmental Health and Safety Guidelines
<b>ERTMS</b>	European Rail Traffic Management System
<b>ESF</b>	Environmental and Social Framework
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESIRT</b>	Environment and Social Incident Response Toolkit
<b>ESMR</b>	Environmental and Social Monitoring Report
<b>ESS</b>	Environmental and Social Standard
<b>ETCS</b>	European Train Control System
<b>GBV</b>	Gender-Based Violence
<b>GIIP</b>	Good International Industry Practices
<b>GM</b>	Grievance Mechanism
<b>HSE</b>	Health, Safety and Environment
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labor Organization
<b>INRAIL</b>	Istanbul North Rail Crossing Project
<b>LM Plan</b>	Labor Management Plan
<b>LMP</b>	Labor Management Procedures
<b>LOTO</b>	Lock Out / Tag Out
<b>MoLSS</b>	Ministry of Labor and Social Security
<b>MoTI</b>	Ministry of Transport and Infrastructure
<b>NATM</b>	New Austrian Tunneling Method
<b>No.</b>	Numbered
<b>OHS</b>	Occupational Health and Safety
<b>PIU</b>	Project Implementation Unit
<b>PPE</b>	Personal Protective Equipment
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SEA/SH</b>	Sexual Exploitation and Abuse / Sexual Harassment
<b>SGK</b>	Social Security Institution
<b>SH</b>	Sexual Harassment
<b>SPD</b>	Standard Procurement Document
<b>TBM</b>	Tunnel Boring Machine
<b>UN</b>	United Nations
<b>WB</b>	World Bank
<b>WBG</b>	World Bank Group
<b>WCMP</b>	Worker's Camp Management Plan
<b>WGM</b>	Workers' Grievance Mechanism
<b>YSS</b>	Yavuz Sultan Selim

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 1

## 1 OVERVIEW OF LABOR USE ON THE PROJECT

The Istanbul North Rail Crossing Project (INRAIL) will involve a significant number of project workers during its construction and operation phases. This section describes the number of Project workers, characteristics of Project workers and timing of labor requirements based on the available information.

### 1.1 Number of Project Workers

The category of Project workers in accordance with the World Bank Environmental and Social Standard (ESS) 2 on Labor and Working Conditions, and their estimated numbers are presented as below. Workers' type of employment contract—full-time, part-time, temporary, or seasonal—will not affect their worker category.

- **Direct workers** are defined as those who are directly employed or engaged to work under the Project Implementation Unit (PIU) of Directorate-General of Infrastructure Investments (AYGM). Approximately 20-30 workers will work in the PIU in the construction phase, and 15-20 in the operation phase.

Some of these workers will be AYGM's own personnel who are civil servants. Civil servants assigned to work on Project related activities, regardless of whether they work full time or part time, will continue to work under the terms and conditions of their existing contracts or appointments in the public sector, unless there has been a legal transfer of their employment or engagement under the project. ESS2 provisions on occupational health and safety, and prohibition of child and forced labor will be applied to civil servants engaged in the project.

AYGM will also hire individual experts to support the functions of PIU such as supervision, monitoring, evaluation, or community engagement related to the Project. They will receive direct payment from AYGM and will be subject to day-to-day instructions and control. Sections 2 to 8 of this Labor Management Procedures (LMP) set out the requirements for these individual experts.

- **Contracted workers** will be the ones who are employed by the design and build (D+B) contractor(s)—and their subcontractor(s)—and the construction supervision consultant (CSC).

The total number of contracted workers during construction phase is estimated around 1,500-2,000 of which CSC's staff is estimated around 25-40.

During the operation phase, the number of contracted workers will be approximately 50-75 and they will mainly handle rail operations, maintenance, signaling, and cleaning through third-party firms.

Sections 2 to 8 of this LMP set out the requirements for the contracted workers.

- **Primary supply workers** will be the employees of firms supplying goods and materials critical to the project (e.g., concrete, stone, gravel, steel, ballast, rail components, electrical cables, and signaling systems). Estimated number of primary supply workers during construction phase is 250-300 and during operation phase is 25-50 (for replacement parts and technical servicing).

Section 9 of this LMP sets out the requirements for primary supply workers.

No **community workers** will be involved in the Project activities.

### 1.2 Characteristics of Project Workers

Direct workers, mostly AYGM staff, are civil servants per national legislation. Both the civil servants and the experts to be hired are expected to be Turkish nationals with backgrounds in engineering, project management, monitoring, and administrative support. Direct workers will

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 2

likely include both male and female professionals. No workers under the age of 18 will be employed in this category.

Contracted workers will perform the bulk of the construction activities and will be hired by the D+B contractor(s), and their subcontractors. The majority of the workforce will include skilled / semi-skilled and unskilled laborers, construction workers, equipment operators, electricians, welders, safety supervisors, and engineers. A portion of these workers, particularly in specialized roles, may be female. The supervision consultant's staff, including environmental, social, health and safety specialists, and monitoring engineers, will also fall under this category. Contractors may also engage workers through intermediaries or brokers, which necessitates strict monitoring and control procedures. Since the construction activities fall under hazardous activities no workers under the age of 18 shall be employed.

Primary supply workers are expected to be full-time employees of the suppliers. They are likely to be based in industrial zones within Türkiye, although international suppliers may also be involved. Supplier staff will generally be male workers, although female workers may be employed in administrative or technical quality control roles. The majority are expected to be Turkish nationals, though migrant labor presence cannot be excluded entirely depending on the supplier's practices. Since these kinds of activities also fall under hazardous activities, no workers under the age of 18 shall be employed.

**Migrant Workers:** Contracted workers may include workers residing in İstanbul, domestic migrants from other parts of Türkiye, and foreign migrant workers, including Syrians under temporary protection and nationals from countries such as Afghanistan, Iraq, and others. Foreign migrant workers will be employed through contractors or subcontractors under direct employment relationships. The engagement of foreign workers through third-party employment agencies is not anticipated; however, if such agencies are used, they will be subject to due diligence to ensure compliance with national labour and migration legislation and to prevent exploitative recruitment practices, including the charging of recruitment fees.

### 1.3 Timing of Labor Requirements

The engagement of direct workers will begin during the pre-construction phase and intensify during construction phase. Most direct workers will be based in AYGM in Ankara with field visits to the construction site as needed. Core staff, such as engineers and environmental/social experts, will remain active throughout the project lifecycle.

Most contracted workers will be mobilized during the construction phase, anticipated to span approximately 6 to 7 years. Workforce numbers will increase significantly during peak construction periods, particularly during civil works such as tunnel excavation, bridge erection, and track installation. Workers will be deployed across multiple locations along the railway alignment. Skilled labor (e.g., welders, electricians, machinery operators) will be recruited as per construction sequencing, while unskilled workers (e.g., helpers, loaders) will be required throughout the duration of site works. During operation, a smaller number of contracted staff may be retained for periodic maintenance, inspections, and specialized repairs. Contractors will be required to submit peak headcount estimates by section and subcontractor tier on a quarterly basis to enable proper planning and sizing of worker accommodation, medical facilities, and transportation arrangements.

Primary supply workers will be engaged in line with procurement schedules for major construction inputs. Timing will vary based on delivery timelines, but their work is likely to precede on-site installation activities. In the operational phase, supply workers may be re-engaged intermittently for specialized parts or system replacements.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 3

## 2 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

### 2.1 Project Activities

The Istanbul North Rail Crossing Project (INRAIL or the Project) aims to complete the missing high-capacity and heavy-duty overland railway link between the European and Asian sides of Istanbul and is therefore expected to significantly improve the connectivity and logistics efficiency of Türkiye's national railway network.

The Project will be implemented by the Directorate-General of Infrastructure Investments (AYGM) of Türkiye's Ministry of Transport and Infrastructure (MoTI) and will be financed by the World Bank.

The railway line, with a total length of 126 kilometers, branches off the Marmaray Line at the Çayırova location, passes by Sabiha Gökçen Airport, turns north after the airport, crosses the Bosphorus via the Yavuz Sultan Selim Bridge, reaches İstanbul Airport, and finally connects to the Halkalı-Kapıkule Line at Çatalca on the European side. The Project components can be summarized as:

- **Structures:**
  - The alignment incorporates 25 tunnels with a total length of 58.44 km, including 5 Tunnel Boring Machine (TBM) tunnels totaling 37.1 km and 20 New Austrian Tunneling Method (NATM) tunnels with a combined length of 21.34 km. In addition, the Project includes 42 viaducts with a total length of 22.1 km, 15 cut-and-cover tunnels totaling approximately 3 km, 21 underpasses and overpasses, and 37 culverts along the alignment.
- **Electrification and Signaling:**
  - To feed electrification facilities, 154/25 kV transformer centers (3 units) will be built.
  - For signaling, European Rail Traffic Management System (ERTMS) / European Train Control System (ETCS) / Automatic Train Protection (ATP) /Level 1-2 automatic train protection and control systems will be installed.

The location of the Project is given in Annex-1.

### 2.2 Key Labor Risks

The Project is expected to involve large-scale civil works including tunneling, elevated viaducts, station, bridge construction, and rail infrastructure deployment across both densely urbanized and semi-rural zones of Istanbul. These activities, along with the scale and complexity of the project, bring several key labor-related risks.

The mitigation measures for the following labor risks are addressed in Section 6. If other labor risks arise during the project implementation, AYGM will develop procedures to prevent further impacts. The contracts with third parties (e.g. D+B contractors, CSC and sub-contractors) will include requirements for management of labor risks.

#### **Occupational Health and Safety (OHS)**

One of the most significant key potential labor risks of the Project are the OHS risks due to the nature of rail infrastructure works. Workers may face hazards such as working at heights, in confined areas and underground tunnels, and around heavy machinery or energized electrical systems. There is also exposure to construction airborne agents such as concrete dust and silica, as well as hazardous materials like solvents, fuel, and welding fumes. The risk of physical injuries and illnesses from moving equipment, vibration, noise, localized landslides, site traffic, welding, ergonomic factors, illumination, fire, explosions, and exposure to corrosive, oxidizing, and reactive chemicals is also high.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 4

The project route passes through forested areas or open fields, which may expose workers to insect bites or heat stress. Seasonal conditions may further exacerbate these risks.

Furthermore, the urban setting increases exposure to traffic-related accidents, especially during transport of materials and access to active construction zones. The limited right-of-way in these areas may also exacerbate OHS risks due to constrained work zones.

Finally, flooding during tunneling, gas leaks in confined areas, and interactions with Istanbul's dense utility networks (water, electricity, gas) pose elevated risks during the construction stage. Earthquakes and ground stability must also be factored in, especially during underground works.

Inadequate awareness or enforcement of personal protective equipment (PPE) use and safety procedures, i.e., unsafe handling of tools, welding practices and improper conduct around electrical or mechanical systems—especially among low-skilled, first-time or migrant construction workers—presents another major challenge.

Potential OHS risks during the operational phase are associated with track inspection, signaling system maintenance, and electrical and mechanical system servicing. Workers tasked with maintaining catenary systems, switches, and track structures may face hazards such as electrocution, slips and falls, ergonomic stress injuries, and exposure to inclement weather conditions during outdoor maintenance work. The presence of moving trains during inspection or repair activities introduces serious safety and timing risks, requiring well-coordinated communication and enforcement of safety protocols.

### **Working Hours**

Due to the complexity of the construction activities, urban constraints along the alignment, and the need to minimize disruption to traffic and local communities, night shifts or extended work hours may become necessary during critical phases of construction. Inadequate monitoring of work hours and rest days—especially among subcontractors—could lead to non-compliance with Turkish labor laws—which stipulate a maximum of 45 working hours per week—and commitment to international labor conventions. If not properly managed, this may result in labor rights violations, reduced productivity, and safety incidents due to worker exhaustion.

### **Child Labor**

While the risk of child labor is low due to the nature of the railway construction sector and strict Turkish labor laws, instances of child labor could occur in low-skilled support services provided by subcontractors or primary suppliers.

### **Forced Labor**

The overall risk of forced labor in Türkiye is considered low due to national legislation and institutional mechanisms. However, considering that the Project will be implemented nearby Istanbul—which is a large urban center with a presence of migrant workers, some of whom may be undocumented—there is a residual risk of coercive recruitment practices, withholding of wages, restriction of movement, or threats of deportation.

### **Migrant Workers**

Based on current labor market dynamics in Istanbul and the expected scale of civil works, the workforce may include domestic and international migrants, including registered Syrians under temporary protection, Afghans and any other migrants from other countries who has work permit. This will introduce risks related to language barriers, cultural integration, and potential vulnerability to poor working conditions or discrimination. Language barriers in particular may increase OHS risks, where workers may not fully understand site rules, safety procedures, training content, or emergency instructions, potentially posing risks both to themselves and to other workers on site.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 5

To mitigate these risks, OHS trainings, toolbox talks, and safety-related materials will be delivered in a manner understandable to migrant workers, including through the use of translated materials, visual aids, and practical demonstrations, as appropriate. Contractors will be required to ensure that migrant workers fully understand OHS requirements and site-specific risks, and that such measures are reflected in the Project’s OHS management and supervision arrangements.

### **Labor Influx**

While the project is located within the metropolitan boundaries of Istanbul—a city with substantial labor availability and skilled workforce—parts of the railway alignment pass near or through semi-rural settlements where formal employment opportunities may be limited. This may result in a moderate degree of labor influx to specific construction segments, particularly where local labor cannot meet the demand for skilled or specialized roles. Labor influx to such semi-rural areas could generate pressure on local infrastructure, housing, and public services, and may also increase the risk of social tensions or gender-based violence (GBV), especially if worker accommodation is not properly managed.

### **Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH)**

The Project, due to its scale and the nature of civil works, involves a substantial construction workforce, including a high proportion of male workers, both local and non-local. This gender imbalance, coupled with the establishment of temporary worker camps or concentration of male workers near semi-rural or residential areas, creates an elevated risk for incidents of SEA/SH, particularly affecting women and vulnerable individuals in host communities and among project workers themselves. In this context, and to mitigate such risks a Worker’s Camp Management Plan will be prepared to ensure the proper management and oversight of worker accommodations, in accordance with ESS2 requirements and related guidance notes with specific attention to minimizing SEA/SH risks in and around worker housing areas. This plan will be prepared by the D+B Contractor(s), reviewed and approved by the AYGM PIU, and subsequently reviewed and approved by the World Bank.

Therefore, the Project is assessed as substantial on SEA/SH risk, mainly due to:

- The size and duration of construction works;
- The likelihood of labor influx into communities near semi-rural project sections;
- The limited local availability of skilled labor in those areas;
- Social and economic vulnerabilities among certain community groups;
- The absence, in some areas, of established institutional mechanisms for addressing SEA/SH.

Further, the construction sector in Türkiye, while governed by strong labor laws, has traditionally been male-dominated, and reported cases of workplace harassment—though likely underreported—indicate the need for proactive prevention and response measures.

Mitigation measures to address SEA/SH risks are included in the section on Policies and Procedures. These measures are aligned with and further detailed under the Project’s SEA/SH Action Plan and the Accountability Response Framework, which sets out specific prevention, reporting, and response actions. This LMP includes a generic Code of Conduct (CoC) to be adopted by all contractors in projects supporting major civil works as part of the Project’s overall SEA/SH risk management approach.

### **Epidemics and Pandemics**

Risks associated with the emergence of new epidemics/pandemics will persist.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 6

### 3 LEGAL FRAMEWORK

Türkiye ratified the following ten fundamental conventions of the International Labor Organization (ILO), incorporating them into its national legislation.

- Forced Labor Convention, 1930 (No. 29)
- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Equal Remuneration Convention, 1951 (No. 100)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labor Convention, 1999 (No. 182)
- Occupational Health and Safety (OHS) Convention, 1981 (No. 155)
- Promotional Framework for OHS Convention, 2006 (No. 187)

**The Labor Law (No. 4857)** serves as the cornerstone in the regulation of worker relations and the safeguarding of the workforce. This comprehensive law encompasses various provisions addressing key aspects such as the principle of equal treatment, employment contracts, their types and termination, wages and payment protocols, penalties for wage reductions, regulations on overwork, work on holidays, holiday pay, annual paid leaves, working hours, compensation work, break periods, regulations on working age, the prohibition of employing children, and provisions for work and breastfeeding leave during maternity. In essence, the Labor Law No. 4857 covers a wide spectrum of crucial elements pertaining to the employment relationship and the well-being of the workforce.

**The Occupational Health and Safety Law (No 6331)** in Türkiye, enacted in 2012, provides a comprehensive legal framework aimed at ensuring safe and healthy working environments across all sectors, regardless of the number of employees or type of employment. The law introduces a proactive, risk-based approach to occupational health and safety, emphasizing the identification, assessment, and mitigation of workplace hazards before incidents occur. It mandates the establishment of internal OHS management systems, the appointment of safety professionals (including occupational safety specialists, workplace physicians, and other health personnel), and regular risk assessments. Furthermore, the law imposes responsibilities on both employers and employees, fostering a shared commitment to safety. It also strengthens regulatory oversight through inspections and sanctions, while promoting training, consultation, and participation of workers in OHS matters. By aligning with European Union directives and international labor standards, OHS Law represents a significant step toward improving workplace safety culture in Türkiye.

The intent of the **Unions and Collective Bargaining Law (No. 6356)** is to outline the procedures and principles governing the formation, administration, functioning, oversight, and organization of worker and employer unions and confederations. Additionally, the law aims to facilitate the negotiation of collective bargaining agreements between workers and employers, allowing them to mutually determine their economic and social standing, as well as working conditions. The law further seeks to establish mechanisms for the peaceful resolution of disputes and provides provisions for the utilization of strikes and lockouts when necessary.

#### 3.1 Brief Overview of Labor Legislation: Terms and Conditions

##### Types of Employment Contracts

As per the Turkish Labor Law, the main categories of employment contracts are: definite (fixed term) and indefinite (open-ended), full time and part time contracts, continuous and transitory contracts; seasonal; employment contracts with or without trial periods; provisional employment contracts and team employment contracts. Employment which lasts only up to 30 days is transitory; and employment which requires a longer period is continual. If employment

Labor Management Procedures		CNR-AYGM-INRAIL-LMP
Final	January 2026	Page 7

is transitory, provisions of the Obligations Act shall apply on certain matters as defined by the Labor Law.

Article 5 of the Labor Law embraces the principle that all employees should be treated equally. Accordingly, employers cannot treat temporary and agency workers or part-time workers differently from the permanent employees unless justifiable grounds exist for the different treatment.

### **Wages and deductions**

Article 32 of the Labor Law defines “wage” in general terms, as the amount of money to be paid in cash by an employer or by a third party to a person in return for work performed by him. Without discrimination, each employee has a right to demand remuneration for the work they conduct.

The minimum wage in Türkiye is determined by the Minimum Wage Determination Commission (Article 39 of the Labor Law). According to Article 4 of the Minimum Wage Regulation (Official Gazette No. 25540, August 1, 2004), the minimum wage is defined as the lowest remuneration payable to workers in return for a normal working day, ensuring that their essential living expenses can be met. Furthermore, Article 102 of the Labor Law explicitly stipulates that employers who pay workers below the legally determined minimum wage are subject to administrative fines. The minimum wage in Türkiye must be determined at least every two years by the Minimum Wage Determination Commission (Article 39 of the Labor Law) <sup>(1)</sup> and published in the Official Gazette <sup>(2)</sup>.

Pursuant to Article 34 of Labor Law any worker whose wage is not paid within twenty days as of the date of wage payment, except for a force majeure, may abstain from fulfilling his/her working liability. Even if the non-fulfilment of working liabilities for this reason based on personal decisions of workers gains a collective character numerically, this shall not be considered as a strike. The highest interest rate applied for deposits shall be applied for wages not paid on due date.

The labor contracts of such workers shall not be terminated, new workers shall not be admitted in their places and their works shall not be assigned to other persons for not working due to this reason.

Pursuant to Article 38 of Labor Law, the employer shall not exercise wage deduction penalty for the worker for reasons other than those specified in the collective contract or labor contract.

The deductions to be made from worker's wages as penalties should be immediately informed to the worker along with reasons thereof. Such deductions from worker wages shall not exceed two daily wages in a month or two days' earnings of the worker in wages paid per piece or per the amount of work performed.

Such deductions shall be deposited with the account of the MoLSS within one month as of the deduction for utilization for the training and social services of the workers, in one of the banks established in Türkiye and entitled to accept deposits, to be nominated by the MoLSS. Every employer shall be obliged to keep a separate account of such deductions at the business.

### **Working hours**

According to Article 63 of the Labor Law, the standard working time shall not exceed forty-five hours per week. Unless otherwise agreed, this time is to be distributed equally across the working days of the week. However, with the mutual agreement of the employer and employee, the weekly working hours may be distributed unevenly across the working days, provided that daily working time does not exceed eleven hours. In such cases, the employee's average

---

<sup>1</sup> In practice, especially during periods of high inflation, it has been determined annually or even twice a year to preserve workers' purchasing power.

<sup>2</sup> The most recent minimum wage was published in the Official Gazette No. 32765 on December 27, 2024 ([www.resmigazete.gov.tr/eskiler/2024/12/20241227-7.pdf](http://www.resmigazete.gov.tr/eskiler/2024/12/20241227-7.pdf)), following the Commission's decision of December 24, 2024.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 8

weekly working time over a reference period of two months must not exceed the standard weekly working time. This reference (or balancing period) may be extended up to four months by collective labor agreements.

The workers shall be informed of the starting and ending times of daily working periods as well as of break times.

Starting and ending times of the working period may be arranged differently for workers, according to the nature of the work (Article 67).

### **Periods reckoned as working period**

According to the Labor Law, the following periods shall be calculated as part of the daily working period of the workers. The periods spent on the way, in cases where the workers are sent by the employer from their workplace to any other places to work.

- c) Free periods of the worker spent at the workplace, being available for working at any moment but waiting for any possible work, without working.
- d) Periods spent by the worker for being sent by the employer to another place or being made occupied at the house or office of the employer or any place relating to the employer, without performing his/her main job.
- e) The periods specified for breast-feeding female workers.
- f) Periods elapsing for collective and regular transport of workers from and to their workplaces which are distant from their settlement area for any kind of work requiring collective transport such as construction, maintenance or repair and modification of railways, roads and bridges (Article 66).

### **Overtime hours and overtime payment**

As per Article 41 of the Labor Law, works which exceed forty-five hours a week are defined as overtime. An employer may request employees to work overtime. The employee's consent shall be required for overtime work. Total overtime work shall not be more than two hundred and seventy hours in a year.

Employees under the age of 18, pregnant women, and breastfeeding mother cannot be required to work overtime.

### **Weekly rest day and rest breaks**

The employees are allowed to take a rest for a minimum of twenty-four hours (weekly rest day) without interruption within a seven-day time period, provided they have worked up to 45 hours on the days preceding the weekly rest day. By law, employers do not have the right to deduct this weekly rest from the employees' salaries. Additionally, Article 68 of the Labor Law states that employees are entitled to a rest break, the duration of which varies depending on the working hours. Each employee is entitled to 15 minutes of break for jobs lasting up to four hours; 30 minutes of break for jobs lasting up to 7.5 hours, and one hour of break for jobs lasting more than 7.5 hours. Arrangements for breaks will be made according to the local traditions and requirements of the work. Employees shall be provided with adequate facilities and reasonable time during work hours for meals and hydration, in line with labor regulations and workplace practices. Such breaks shall be at minimum level and applied uninterruptedly.

However, such periods may be applied intermittently by reaching an agreement, considering the climatic and seasonal conditions and local traditions as well as the nature of the work.

Breaks may be used by workers at the same time or at different times at a workplace.

Breaks shall not be considered as part of working period (Article 68).

### **Annual Leaves**

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 9

The minimum leave period according to the length of service of the employee has been set in the Labor Law as follows;

- 1 to 5 years (included) - 14 working days
- 5 to 15 years - 20 working days
- 15 years (included) or longer - 26 working days

The Law stipulates that paid annual leave may not be less than 20 days for employees over the age of 50. Employees are also provided to the right to take up to 4 days leave without pay, on the condition that the employee provides documentary evidence that s/he is spending his/her annual leave at a place other than where the workplace is located.

Employees engaged in seasonal or other occupations which, owing to their nature, last less than one year are not entitled to paid annual leave.

Paid leaves for civil servants have been defined in the Law (No:657) as; who have served for less than 10 years have 20 days of annual leaves and those who have served for more than 10 years have the right of 30 days annual leave.

### **Labor disputes**

The Labor Law includes provisions that allow workers to resolve disputes in cases where there is a disagreement between the employer and the employee over the essential terms and conditions of a labor agreement or other aspects of work. (Article 20 of Labor Law; Article 91 of Labor Law regulates “the application to the MoLSS for workers’ rights arising from their debt owed.; Article 50-51-52 of Law No. 6356 on Trade Unions and Collective Bargaining Agreements regulates “rights of application to the High Board of Arbitration and Private Arbitrator for workers labor disputes”; Article 3 of Law on Labor Courts numbered 7036 regulates “conciliation procedure”.

The employee who alleges that no reason was given for the termination of his employment contract or who considers that the reasons shown were not valid to justify the termination shall be entitled to lodge an appeal against that termination with the labor court within one month of receiving the notice of termination. If there is an arbitration clause in the collective agreement or if the parties agree, the dispute may also be referred to private arbitration within the same period of time.

The burden of proving that the termination was based on a valid reason shall rest on the employer. However, the burden of proof shall be on the employee if he claims that the termination was based on a reason different from the one presented by the employer.

The court must apply fast-hearing procedures and conclude the case within two months. In the case the decision is appealed, the Court of Cassation must issue its definitive verdict within one month (Article 20).

If the court or the arbitrator concludes that the termination is unjustified because no valid reason has been given or the alleged reason is invalid, the employer must re-engage the employee in work within one month. If, upon the application of the employee, the employer does not re-engage him in work, compensation to be not less than the employee’s four months’ wages and not more than his eight months’ wages shall be paid to him by the employer.

In its verdict ruling the termination invalid, the court shall also designate the amount of compensation to be paid to the employee in case he is not re-engaged in work.

The employee shall be paid up to four months’ total of his wages and other entitlements for the time he is not re-engaged in work until the finalization of the court’s verdict. If advance notice pay or severance pay has already been paid to the reinstated employee, it shall be deducted from the compensation computed in accordance with the above-stated subsections. If term of notice has not been given nor advance notice paid, the wages corresponding to term of notice shall also be paid to the employee not re-engaged in work.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 10

For re-engagement in work, the employee must make an application to the employer within ten working days of the date on which the finalized court verdict was communicated to him. If the employee does not apply within the said period of time, termination shall be deemed valid, in which case the employer shall be held liable only for the legal consequences of that termination (Article 21).

Termination of an employment contract: Under the Labor Law, employers can terminate contracts in two ways: (i) showing a valid reason (Art. 18-19) or (ii) breaking the contract for a just cause. Employees who have completed 6 months of employment in a workplace that has at least 30 workers, can benefit from certain protections under the Labor Law, protecting the worker from arbitrary termination of his/her contract. For the termination of an employment contract to be valid, a written notice must be given to the employee and legal notice periods must be respected. However, in certain cases, employers can terminate the employment relationship on the basis of a just cause (for reasons of health, for immoral, dishonorable or malicious conduct or other similar behavior, force majeure). In these cases, the employer is not obliged to comply with the legal notice periods and can terminate it immediately (Art. 24-26).

### **Severance payment**

Upon termination of the employment contract, employees are entitled to a severance payment on the condition that the employee has completed at least one year of continuous employment. This payment is calculated by multiplying the number of years of employment with the employee's monthly salary at termination. If the employer terminates the employment contract under just cause based on health reasons or force majeure, the employer must give severance pay to the employee, if applicable. However, if the employer terminates the employment contract under just cause on grounds of immoral and dishonorable acts of the employee, the employer is not liable to pay severance. If the employee terminates the employment contract for just cause, the employer must pay severance in all cases.

However, where the employee terminates the employment contract at will, without the presence of any cause set out under the Labor Law, the employer is not liable to pay severance to the employee.

### **Freedom of Association**

Employees are free to associate in and join trade unions and discrimination based on such membership is prohibited (Article 51 of the Constitution, Articles 3, 17, and 25 of the Unions and Collective Bargaining Law and Article 18 of the Labor Law). Trade unions may be established in 20 sectors predefined by the MoLSS (Article 5, Unions and Collective Bargaining Law).

Collective agreements are governed by the Unions and Collective Bargaining Law, which regulates trade unions' activities, collective bargaining, and industrial action in both the private and public sectors in 20 activity areas (Articles 1 and 4, Unions and Collective Bargaining Law).

Collective agreements at the sectoral level may only regulate matters related to trainings, OHS, social responsibility, and employment policies (Article 33, Unions and Collective Bargaining Law). Collective agreements at company level may be concluded for one or more workplaces and may cover one or more employers (Articles 33 and 34, Unions and Collective Bargaining Law).

In order to be competent to initiate collective bargaining, trade unions must represent at least three percent of the workers engaged in a given branch of activity, more than 50 percent of workers in the workplace, or 40 percent of the workers in the enterprise to be covered by the collective agreement (Article 41, Unions and Collective Bargaining Law). Their competence is ascertained annually by the MoLSS and may be disputed by employers (Article 42, Unions and Collective Bargaining Law).

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 11

## **Non-discrimination and Equal Opportunities**

The Constitution guarantees equality before the law and equal legal protection irrespective of a person's language, race, color, gender, political opinion, philosophical belief, religion, or sect membership (Article 10). Employment related discrimination is a criminal offence (Article 122, Criminal Code). The Law on Human Rights and Equality Institution in Türkiye prohibits discrimination based on gender, ethnicity, nationality, skin color, language, religion, philosophical or political opinion, wealth, birth, marital status, health, disability or age (Article 3).

The Labor Law prohibits both direct and indirect discrimination against jobseekers and employees on grounds of language, race, disability, political opinion, philosophical belief, religion, or any employment relationship (Article 5).

Discrimination based on gender and maternity is prohibited, unless justified under the Article 5 of the Labor Law. The Labor Law forbids termination of employment on grounds of race, color, sex, marital status, family responsibilities, pregnancy, birth, religion, or political opinion (Article 18).

Article 6 of the Law on Human Rights and Equality Institution in Türkiye specifically covers job advertisements, selection criteria, recruitment, and promotions. The law lays down and extends the principle of equal treatment to access to employment, vocational training, promotion, and working conditions, and to access all types and all levels of vocational guidance, vocational retraining, including practical work experience.

Workers who have been discriminated against are entitled to financial compensation amounting to up to their four monthly wages (Article 5, Labor Law).

## **Sexual Harassment in the workplace**

Turkish law prohibits sexual harassment. Provisions of the Constitution, Criminal Code, Law of Obligations, Civil Code, and Labor Law all prohibit harassment.

The Labor Law entitles employees to immediately terminate their employment contracts if they are subject to harassment. Protection from harassment is not limited to sexual harassment but also includes the protection of the employee's dignity and honor, in which case the employee may be entitled to demand immediate termination of the employment relationship. Employees are entitled to severance pay and all other acquired rights when the employment contract is terminated on these grounds (Articles 24 and 25, Labor Law). Furthermore, employers must take the necessary actions to protect employees from both psychological and sexual harassment (Article 417, Law of Obligations).

## **Collective Dismissal**

Labor Law Article 29.- When the employer contemplates collective terminations for reasons of an economic, technological, structural or similar nature necessitated by the requirements of the enterprise, the establishment or activity, he shall provide the union shop-stewards, the relevant regional directorate of labor and the Public Employment Office with written information at least 30 days prior to the intended lay-off. A collective dismissal occurs when,

- a) in establishments employing between 20 and 100 employees, a minimum of 10 employees; and
- b) in establishments employing between 101 and 300 employees, a minimum of 10 percent of employees; and
- c) in establishments employing 301 and more workers, a minimum of 30 employees, are to be terminated in accordance with Article 17 on the same date or at different dates within one month.

## **Forced Labor and Child Labor**

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 12

Labor Law does not cover forced labor issues. However, Article 18 of the Constitution of the Republic of Türkiye, prohibits forced labor: “No one shall be forced to work. Forced labor is prohibited. Work required of an individual while serving a sentence or under detention provided that the form and conditions of such labor are prescribed by law; services required from citizens during a state of emergency; and physical or intellectual work necessitated by the needs of the country as a civic obligation shall not be considered as forced labor.” Prison labor, work during a state of emergency, and work required by the country as a civic obligation do not constitute forced labor.

Article 80 and Article 117 of the Penal Code penalizes human trafficking and violation of the freedom to work and labor, respectively.

Türkiye has ratified the ILO Convention No. 29 on Forced Labor and ILO Convention No. 105 on the Abolition of Forced Labor.

Labor Law sets the minimum age at which a child can be employed as well as the conditions under which children can work (Article 71). The minimum employment age is 15, but in certain cases of vocational training, mild work may be allowed for 14-year-olds.

According to Turkish Labor Law, Article 73, boys under the age of eighteen and women irrespective of their age must not be employed on underground or underwater work like in mines, cable-laying and the construction of sewers and tunnels. While complying with legal restrictions on underground assignments, the Project shall ensure non-discrimination by actively recruiting and placing women in surface works, labs, quality control, E&S, depots, control rooms and administration; and will report quarterly by job family and grade.

Türkiye has ratified the United Nations (UN) Convention on the Rights of the Child, which protects children from economic exploitation and from performing any work that is likely to be hazardous, interfere with their education, or harm their health or physical, mental, spiritual, moral, or social development.

### **3.2 Brief Overview of Labor Legislation: Occupational Health and Safety**

The MoLSS is the main responsible organization in this field, in collaboration with other ministries and stakeholders, and is responsible for developing, implementing and enforcing legislation. The two most relevant units of the MoLSS are the Directorate General of Occupational Safety and Health, and the Department of Guidance and Inspection. The Directorate General develops legislation of occupational safety and health in collaboration with other stakeholders, while Department of Guidance and Inspection perform inspections in terms of compliance with occupational safety and health legislation, and also for labor relations and management issues.

The Occupational Safety and Health Law includes all workplaces and workers, including civil servants, workers at private enterprises and the self-employed workers; regardless of the number of employees or the kind of work. Providing occupational safety and health services is the responsibility of the employer. The employer, in accordance with legal requirements can provide the services by establishing an occupational safety and health unit in the workplace.

The education, training and placement of occupational physicians, occupational safety experts' and other health personnel is conducted under the authority of the MoLSS, whereas the performance of certification exams was delegated to the Measuring, Selection and Placement Centre.

The Occupational Health and Safety Law (OHS Law) (No. 6331; 2012) was published in the Official Gazette in 2012. Before 2012, occupational safety and health issues were regulated in the Labor Law, related regulations and some other general laws. The OHS Law applies to all jobs and workplaces in both the public and private sector, regardless of their field of activities or number of workers, and covers all employees, interns, employers and their representatives.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 13

The ultimate aim of the OHS Law is to prevent occupational diseases and accidents, and other physical and mental health problems of the workers related to work and the work environment. The OHS Law defines the main stakeholders namely employees, employers and the State, and their duties and responsibilities in working life. The Law also defines the basic terminology related to work life such as workplace, hazard, risk, occupational disease, occupational accident, prevention, safety and health unit, occupational safety and health professionals and their responsibilities. According to the OHS Law, the employer should perform risk assessment and has the responsibility of taking all necessary measures to ensure occupational safety and health. In addition, under national legislation, all employees must be registered with the social security system, which provides mandatory health insurance coverage. Employers are responsible for ensuring workers' registration with the Social Security Institution (SSI), through which workers access public health services. Registered foreign workers, including those under temporary protection, are entitled to access health services in accordance with applicable national regulations.

Article 4 of the Law defines the duties, authority and responsibilities of the employer and workers. As per Article 4, the employer has a duty to ensure the safety and health of workers in every aspect related to work. In this respect the employer shall take the measures necessary for safety and health protection of workers, including provision of necessary organization, designating safety and health staff, informing and training of workers, carrying out risk assessment, implementing measures related to occupational safety and health in accordance with the legislation, etc.

As indicated in Article 6 of the Law, in order to provide OHS services employers shall appoint an occupational safety specialist, workplace doctor, and, in very hazardous workplaces with ten or more employees, additional health personnel from among their staff. If qualified personnel are not available internally, these services may be obtained partially or fully from authorized joint health and safety units or OHS centers, and employers who possess the required qualifications and certification may carry out the services themselves, considering the workplace's hazard class and workforce size. Employers are obligated to provide appointed personnel or contracted institutions with all necessary resources, including tools, equipment, space, and time; ensure cooperation and coordination among OHS service providers; implement legally compliant, written OHS measures; and inform all relevant parties, including outside workers and their employers, of any known or potential risks. In workplaces with a full-time workplace doctor, appointing additional health personnel is not required.

The OHS Law also regulates workers' right to abstain from work in cases of serious or imminent danger. The OHS Law refers to secondary legislation to for a description of further details to ensure an effective implementation of the Law.

### **Secondary Legislation**

A series of secondary legislation have been adopted to explain the details of relevant laws. Other regulations that can be evaluated within the context of the Project are (but not limited to);

- Regulation on the Use of Personal Protective Equipment in Workplaces: The purpose of this regulation is to determine the procedures and principles regarding the features, supply, use and other matters of personal protective equipment to be used in cases where the prevention or adequate reduction of risks in the workplace cannot be achieved by collective protection or work organization or working methods based on technical measures.
- Regulation on the Procedures and Principles of Employee's OHS Training: The purpose of this regulation is to regulate the procedures and principles of OHS training to be given to employees.
- Regulation on OHS in Construction Works determines the framework for the minimum OHS requirements for construction works.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 14

There are also more regulations such as on “noise control”, “dust control” or “control of chemicals” where the permissible limits were defined, and some organizational ones such as regulation on “shift work”, “occupational hygiene measurements, test and analysis”, etc.

### **Policies (according to OHS Directive of MoTI)**

- Prevention of occupational risks
- Protection of health and safety
- Elimination of risk and accident factors
- Training, informing, obtaining opinions and participation of all employees and their representatives on OHS.
- To determine the general principles and other issues related to the working conditions of persons who need special protection due to their age, sex and special circumstances.

### **Identification of Potential Hazards to Protect Workers, Particularly from Life Threatening Ones and Implementation of Preventive and Protective Measures**

Per articles 4, 6 and 22 of OHS Law, employers are under the obligation to: (1) take the measures necessary to protect the health and safety of workers, including prevention of occupational risks, and provide relevant trainings; (2) monitor and check compliance with the undertaken OHS measures and ensure that nonconforming situations are eliminated; (3) carry out a risk assessment or have one carried out; (4) take into consideration a worker's capabilities as regards health and safety when assigning tasks to the worker; (5) take appropriate measures to ensure that workers, who have not received adequate information and instructions, are denied access to areas where there is a life-threatening or special hazard; (6) appoint occupational safety experts, occupational physicians, and other medical personnel; (7) provide the requisite equipment; and (8) establish an OHS unit; all employers with more than 50 employees are required to establish an OHS committee.

### **Training of Project Workers and Maintenance of Training Records**

Workers and workers' representatives have to be informed about OHS risks and preventive measures relating to their work, as well as their rights and responsibilities (Article 16, OHS Law). Furthermore, employers shall make sure that employees are trained in safety and health before they start working or when changes are made to the type of work carried out or to the technologies or the equipment used. Additionally, workers, who have had an occupational accident or disease, shall receive additional training on causes of the accident or disease, ways to protect themselves, and safe working methods. Similarly, workers who have been absent from work for any reason over six months, shall undergo retraining before resuming work. Time spent on trainings shall be reckoned as worktime. Therefore, if the time allocated for trainings exceeds weekly working hours, hours worked in excess of weekly working hours shall be considered overtime (Article 17, OHS Law). Where workers do not speak Turkish, OHS trainings and related materials shall be provided in a language and manner they can understand, including through translated materials, visual aids, or practical demonstrations, as appropriate.

Contracted workers may not perform hazardous work until they provide proof that they have received the requisite training (Article 17, OHS Law).

The employer shall ensure that the employees participate in the OHS training programs and that the participation is recorded and maintained with the Training Participation Report (Article 5, Regulation on the Procedures and Principles of Employee's OHS Training).

### **Documentation and Reporting of Occupational Accidents, Diseases, and Incidents**

Pursuant to Article 14 of Occupational Health and Safety Law;

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 15

(1) The employer shall;

- keep a record of all occupational accidents and occupational diseases, conduct the necessary investigations, and prepare reports related to them.
- investigate incidents that occur in the workplace which, although not causing injury or death, result in damage to the workplace or work equipment, or have the potential to cause damage to the employee, workplace, or work equipment, and shall prepare reports related to them.

(2) The employer shall notify the Social Security Institution within the period specified below:

- Occupational accidents, within three working days following the accident.
- Occupational diseases reported to the employer by healthcare providers or the workplace physician, within three working days from the date they are learned.

(3) The workplace physician or healthcare providers shall refer cases for which they have made a preliminary diagnosis of an occupational disease to healthcare providers authorized by the SGK.

(4) Healthcare providers shall notify the SGK of occupational accidents reported to them, and authorized healthcare providers shall notify the Institution of diagnosed cases of occupational disease, within no later than ten days.

### **Emergency Prevention and Preparedness and Response Arrangements to Emergency Situations**

Employers shall designate a sufficient number of persons adequately trained in and equipped for prevention, protection, evacuation, firefighting, first aid, and other related issues considering the size and specific hazards of the undertaking, nature of the activities, number of employees, and other persons present in the workplace. The number of such workers and their training and equipment available to them shall be adequate and employers shall arrange emergency drills and trainings and make sure that the rescue teams are available to respond at all times (Article 11, OHS Law).

In the event of a serious, imminent and unavoidable danger, employers shall take appropriate actions, cease operations and instruct their employees to leave the workplace and move to a safe place. Employers may ask only workers, who are adequately trained and equipped and specially assigned, to resume work. In the event of a serious and imminent danger, employers shall ensure that all employees are able to take the appropriate actions to avoid the consequences of such danger if their immediate supervisors cannot be contacted (Article 17, OHS Law).

### **Remedies for Adverse Impacts, Such as Occupational Injuries, Deaths, Disabilities and Diseases**

Employees incapacitated for work due to an injury, work-related injury, disease or occupational disease are entitled to (1) a daily temporary incapacity allowance during the period of temporary incapacity to work; and (2) if appropriate a permanent incapacity benefit. Furthermore, survivors of insurance holders who died due to a work accident or an occupational disease are entitled to specific benefits (Articles 16, 17, 18, 19 and 20, Social Insurance and General Health Insurance Law).

If a work accident or an occupational disease was the employer's or employees' fault, the SGK shall collect from the employers the sum of benefits it had paid to the insurance holders or their survivors (Article 21, Social Insurance and General Health Insurance Law). Employees are entitled to a disability pension under specific conditions, when permanent disability occurs (Article 26, Social Insurance and General Health Insurance Law). The determination of fault and liability is based on the findings of official accident and occupational disease assessments conducted in accordance with national legislation.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 16

### **OHS Risks Which May Be Specific to Female Workers**

In Türkiye, women may not be employed to perform underground or underwater work in e.g., mines, sewers, and tunnels (Article 74, Labor Law). Only women over 18 may work nightshifts, the duration of which may not exceed 7.5 hours and they must be provided with safe transportation to their homes after nightshifts (Article 72 of the Labor Law and Articles 1 and 5 of the Regulation on Working Conditions at Night for Female Workers). Furthermore, pregnant and breastfeeding employees are prohibited from working at night from the beginning of pregnancy until one year after they give birth (Article 9, Regulation on Working Conditions at Night for Female Workers). Also, according to the Regulations on Overtime and Extra Hours, pregnant and breastfeeding employees may not be required to work overtime (Article 8). The Law does not have a balanced representation of women on OHS committees.

### **Procedures to Establish and Maintain a Safe Working Environment**

Per Articles 4, 6 and 22 of OHS Law, employers are under the obligation to, among other things take the measures necessary to protect the health and safety of workers, including prevention of occupational risks, and provide relevant trainings, monitor and check compliance with the undertaken OHS measures and ensure that nonconforming situations are eliminated, carry out a risk assessment or have one carried out, take into consideration a worker's capabilities as regards health and safety when assigning tasks to the worker, take appropriate measures to ensure that workers, who have not received adequate information and instructions, are denied access to areas where there is a life-threatening or special hazard, appoint occupational safety experts, occupational physicians, and other medical personnel, provide the requisite equipment, and establish an OHS unit. Additionally, all employers with more than 50 employees are required to establish an OHS committee.

### **Right and Responsibility to Report Unsafe Situation, Right to Leave the Workplace and Prohibition of Retaliation for Reporting**

Workers exposed to a serious, imminent and unavoidable danger are entitled to refuse to work, to leave the workplace and seek shelter in a safe space. They should not be placed at any disadvantage as a result of their decision (Article 13, OHS Law).

Workers exposed to a serious and imminent danger should immediately report it to the OHS committee or, in the absence of the committee, to the employer. If the committee or employer believes that there is existence of a risk, the employees may leave the job until necessary mitigation measures have been taken. Employees may terminate employment if the employer fails to take the necessary measures (Article 13, OHS Law).

### **Collaboration and consultations with project workers on OHS**

According to the Article 16 of OHS Law, employers have to ensure that contractors inform their workers about OHS risks and measures, as well as their rights and responsibilities. Two or more employers sharing a workplace shall cooperate in implementing OHS measures and maintaining occupational hygiene (Article 23, OHS Law).

Article 10 of "Regulation on Occupational Health and Safety in Construction Works" specifies the necessity of OHS plan in Construction works.

The law does not require a balanced representation of women in OHS committees.

### **Facilities for Workers**

Provisions applying to the workplace apply also to all premises used by reason of the nature and execution of the work and organized under the same management, including all facilities annexed to the establishment, such as rest rooms, nurseries, cafeterias, dormitories, bathrooms, rooms for medical examination and nursing, places for physical and vocational training and courtyards, as well as company vehicles (Article 2, Labor Law). Canteens and other food facilities should be provided in establishments with at least 150 employees (Article 115, Labor Law).

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 17

### Standards for accommodation of construction workers

According to Regulation on OHS in Construction Works (Appendix-4:59-65); accommodation places for workers:

- should be non –flammable
- should be away from hazards created by the construction work
- have heating, cooling and ventilation systems, electrical installations and lighting systems
- have sufficient width and sufficient number of tables and chairs, enough bedsteads, beds, blankets, a recreation room
- have an adequate shower, toilet, washbasin and cleaning equipment etc.

### System for Regular OHS Review

Per Articles 4, 10 and 17 of OHS Law, Employers have to carry out regular risk assessments and take appropriate measures to ensure that only workers who have received adequate information and instructions have access to areas where there is a life-threatening or special hazard.

### 3.3 World Bank Requirements

The Environmental and Social Standard ESS2 on Labor and Working Conditions within the World Bank's Environmental and Social Framework (ESF) acknowledges the significance of maintaining positive worker-management relationships and fostering project development through fair treatment of workers and the provision of safe and healthy working conditions. The existing national legislation in Türkiye already adequately addresses working conditions, worker relationship management, workforce protection, and OHS, satisfying the stipulations of ESS2. Therefore, these aspects will not be reiterated in this LMP. Instead, the LMP will focus on additional requirements of ESS2 applicable throughout the project life cycle, including:

- **Categorization of Project Workers:** Differentiating between direct, contracted, and primary supply workers and applying ESS2 requirements to each category accordingly.
- **Risk Assessment and Mitigation:** Evaluating risks arising from interactions between project workers and local communities and implementing proper mitigation measures, including the adoption of a formal code of conduct.
- **Documentation for Project Workers:** Providing clear and understandable documentation outlining the terms and conditions of employment at the commencement of the working relationship. For migrant workers, reasonable measures will be taken to ensure that such documentation is understandable, including through translation or other appropriate communication methods. For workers who may face challenges in reading or understanding the documentation (e.g., migrant workers), additional oral explanations will be provided to support comprehension and documented through meeting records or notices on workers' bulletin boards.
- **Workers' Grievance Mechanism (WGM):** Establishing a WGM for all direct and contracted workers, informing them about it during recruitment, displaying relevant information on noticeboards, and implementing measures to protect workers from reprisals for using the WGM. The mechanism will be easily accessible to all project workers.
- **OHS Measures:** Incorporating OHS measures that adhere to both national legislation and ESS2. Consideration will be given to the General Environmental Health and Safety Guidelines (EHSG) and, when applicable, industry specific EHS Guidelines and other Good International Industry Practices (GIIP).

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 18

- Reporting of Occupational Fatalities or Serious Injuries: Mandating that in the event of an occupational fatality or serious injury, contractors must promptly report to AYGM and AYGM will, in turn, report to the World Bank upon notification by the contractor. Similar reporting obligations extend to subcontractors and primary suppliers.

In addition, the Project will follow the General EHS (2007) and the sector-specific EHS Guidelines for Railways, as issued by the World Bank Group/IFC. These guidelines provide GIP for the management of OHS risks. Key topics include:

- Hazard identification and risk assessment
- Provision and use of PPE
- Emergency preparedness and response
- Training and awareness programs for workers
- Safe work practices and site security
- Monitoring and incident reporting

These requirements will be included in bidding documents and contracts with D+B contractors.

The EHSs are publicly accessible at: <https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines>.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 19

## 4 RESPONSIBLE STAFF

This section identifies the functions and/or individuals within the project responsible for (i) engagement and management of project workers, (ii) engagement and management of contractors/subcontractors, (iii) OHS, (iv) training of workers, (v) addressing worker grievances.

### 4.1 AYGM PIU

For this Project, a Project Implementation Unit will be established under AYGM. Among other specialists the PIU will be staffed by a social specialist—with relevant experience in handling gender-based violence—and an OHS specialist, who will be responsible for the implementation and monitoring of this LMP (for detailed description of PIU please see Environmental and Social Impact Assessment (ESIA) Report and will remain in the position throughout the Project life cycle. The roles and responsibilities of these specialists regarding the implementation, monitoring and reporting of LMP are listed in below:

- Apply this LMP to project workers.
- Maintain records of recruitment and employment process of direct workers.
- Ensure that the D+B contractor(s) prepare and adopt their Labor Management Plan (LM Plan), in compliance with this LMP, OHS Plan before commencement of construction work.
- Approve the LM Plan and OHS Plan prepared by the D+B contractor(s) before commencement of construction works. Approval of the LM Plan and OHS Plan will ultimately be subject to the World Bank’s no-objection, following the initial approval by the AYGM PIU.
- Monitor and report on implementation of D+B Contractor(s)’s LM Plans.
- Monitor that the D+B Contractor(s) are meeting obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract the World Bank Standard Bidding Documents, and in line with ESS2 and Turkish Labor and OHS laws.
- Monitor employment process of contracted workers to ensure it is carried out in accordance with this LMP and Turkish Labor Law.
- Ensure that AYGM verifies that the supervising engineer adequately oversees the contractor’s OHS obligations, including through regular site visits, identification of OHS nonconformities, and confirmation that corrective actions are implemented in a timely manner, in line with national OHS legislation, ESS2, and the OHS Plan.
- Ensure that project workers receive training on SEA/SH prevention and CoC at the start of the employment and monitor SEA/SH prevention measures implementation during the life of the project through the work of the CSC, who reports to the PIU.
- Ensure and monitor training of the project workers on OHS, and any other required trainings through the work of the CSC, who reports to the PIU.
- Ensure that the WGM is established; and monitor and report on its implementation through the work of the CSC, who reports to the PIU.
- Ensure that dedicated SEA/SH grievance mechanism (GM) is established; and monitor and report on its implementation through the work of the CSC, who reports to the PIU.
- Monitor implementation of the workers’ CoC.
- Establish and implement a procedure for documenting specific incidents such as project-related occupational injuries, illnesses, lost time accidents and incidents related to sexual exploitation and abuse and sexual harassment. Maintain such records and require from all third parties and primary suppliers to maintain them. Such records will form an input into the regular review of OHS performance and working conditions.
- Implement disciplinary measures in instances of SEA/SH misconduct.
- In instances of medium, severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate and the World Bank.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 20

## 4.2 Construction Supervision Consultant

The Construction Supervision Consultant will oversee labor and safety performance daily, on behalf of the AYGM. The ESIA Report requires the Supervision Consultant to employ qualified experts for such oversight and to report on performance to AYGM monthly.

The social and OHS Specialists of PIU will work in close coordination with the CSC's social and OHS Specialists. Coordination will be ensured through joint site inspections, review of monthly contractor and CSC reports (by PIU), weekly coordination meetings, capacity building activities provided by PIU's specialists to CSC's specialists.

The roles and responsibilities of CSC's specialists regarding the implementation, monitoring and reporting of LMP are listed in below:

- Review the LM Plan and OHS Plan to be prepared by the D+B Contractor(s) including all updates and revisions at frequencies specified in the D+B Contractor(s)'s contract.
- Undertake, as required, audits, supervisions and/or inspections of any sites where the D+B Contractor(s) is undertaking activities under its contract, to verify the Contractor's compliance with ESS2 and EHSG requirements (including relevant requirements on SEA/SH);
- Undertake audits and inspections of D+B Contractor(s)'s accident logs, monitoring findings and other ESS2 and EHSG related documentation, as necessary, to confirm the D+B Contractor(s)'s compliance with ESS2 and EHSG requirements (including relevant requirements on SEA/SH);
- Determine remedial action/s and their timeframe for implementation in the event of a noncompliance with the D+B Contractor(s)'s ESS2 and EHSG obligations;
- Ensure appropriate representation at relevant meetings including site meetings, and progress meetings to discuss and agree appropriate actions to ensure compliance with ESS2 and EHSG obligations;
- Ensure that the D+B Contractor(s)'s actual E&S (including OHS) reporting (content and timeliness) is in accordance with the D+B Contractor(s)'s contractual obligations and these reports are shared with PIU in a timely manner.
- Review and critique, in a timely manner, the D+B Contractor(s)'s ESS2 and EHSG documentation (including regular reports and incident reports) regarding the accuracy and efficacy of the documentation.
- Immediately notify the AYGM PIU of any failure by the D+B Contractor(s) to comply with its SEA and SH obligations;
- Ensure that project workers receive training on SEA/SH prevention and CoC at the start of the employment through regular review of records and training plans and monitor SEA/SH prevention measures implementation during the life of the project through site visits.
- Ensure and monitor training of the project workers on OHS, and any other required trainings through regular review of records, site visits, review of training plans.
- Ensure that the WGM is established; and monitor and report on its implementation.
- In instances of medium, severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate and the PIU.

## 4.3 D+B Contractor(s)

The D+B Contractor(s) will be responsible for the following:

- Employ or appoint qualified social, labor, and occupational safety experts to prepare and implement project specific LM Plan, OHS Plan, and to manage subcontractor performance.
- Develop their own LM Plan and OHS Plan, consistent with this LMP and ESS2, which will apply to contracted and sub-contracted workers. These plans will be submitted to the CSC for review and approval before the contractors mobilize for the design stage.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 21

- D+B Contractors will supervise their subcontractors' implementation LM Plan and OHS Plan, and ensure that subcontractor contracts include explicit obligations to comply with the ESMP, LMP, and OHS Plan, as applicable
- Maintain records of recruitment and employment process of contracted workers.
- Clearly communicate job description and employment conditions to contracted workers and provide them with one copy of the employment contract. For migrant workers, reasonable measures will be taken to ensure that this information is understandable, including by providing the contract or written materials explaining key terms and conditions in a language they can understand.
- Develop, implement, and maintain WGM and address the grievance received from the contracted and sub-contracted workers. Report on WGM implementation to the CSC and the AYGM.
- Have a system for regular review and reporting on labor and OHS performance.
- Deliver regular work induction trainings including but not limited to OHS, health, safety and environment (HSE), social induction, trainings to employees.
- Ensure that all contractor and sub-contractor workers understand and sign the CoC prior to the commencement of works.
- Ensure that contracted and sub-contracted workers receive training on SEA/SH prevention and CoC at the start of the employment and monitor SEA/SH prevention measures implementation during the life of the project.
- Establish and implement a procedure for documenting specific incidents such as project-related occupational injuries, illnesses, lost time accidents and incidents related to sexual exploitation and abuse and sexual harassment. Maintain such records and require all third parties and primary suppliers to maintain them. Such records will form an input into the regular review of OHS performance and working conditions.
- Implement disciplinary measures in instances of SEA/SH misconduct.
- In instances of medium, severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate, CSC and the PIU.

After the bidding process is completed and the D+B Contractor(s) are known, this LMP can be updated to include additional details about firm(s), as necessary.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 22

## 5 POLICIES AND PROCEDURES

The Project will adhere to the OHS, reporting and monitoring and other general policies set out in this Section.

### OHS Plans

The following OHS standard requirements should as a minimum be included in the OHS Plans to be prepared by the D+B contractors:

- Risk Assessment Procedure. In accordance with Article 10 of the OHS Law and the Regulation on Risk Assessment, a specific risk assessment document will be prepared for each job type, including hazard identification and mitigation measures.
- Work permitting for hazardous work (working at heights, hot work, work on energized lines, work within confined spaces etc. As per the Regulation on Health and Safety Conditions in the Use of Work Equipment, written work permits must be issued for high-risk work.
- Golden rules<sup>3</sup> for life threatening works. For railway works, special attention will be given to working in electrified environments, including proximity to high-voltage catenary lines, and implementing track possession and isolation procedures where applicable.
- Emergency response procedure. Emergency Action Plans will be prepared in line with the Regulation on Workplace Emergency Situations, including scenarios for fire, natural disasters, and toxic releases.
- Fall prevention and working at heights. This will include specific protocols for viaducts, bridges, and signal towers used in railway construction. Measures will comply with the Communiqué on Working at Heights. Collective protection systems (e.g., guardrails, scaffoldings) and PPE will be mandatory.
- Excavation, ladders, and scaffolders safety; welding and cutting safety; cranes, derricks, and forklifts safety; power and hand tools safety. In railway works, trenching for cable ducts, subgrade excavation and ballast layering will be conducted with strict slope stabilization and shoring techniques.
- Respiratory prevention to chemical and airborne hazards (including dust, silica, and asbestos). Control of exposure to chemicals, dust, and asbestos will follow the Regulations on Health and Safety Precautions for Working with Carcinogenic or Mutagenic Substances and the Regulation on Chemical Agents.
- Electrical safety (hazardous energies control, lock out tag out, energy verification, safe distance work, wiring and design protection, grounding, circuit protection, arc fault protection, Electrical safety, PPE, and dielectric tools); hazards communication; steel erection safety; fire safety; concrete and masonry safety. For railway construction, lock out / tag out (LOTO) procedures will also cover signal systems and catenary power lines. All staff working near energized tracks will receive task-specific electrical safety training.
- Noise and vibration safety. Based on the Regulations on Protection of Employees from Noise and Vibration, regular exposure measurements will be conducted, and control measures (engineering or PPE) will be taken where limits are exceeded.

---

<sup>3</sup> Golden rules usually address issues such as work at heights, work in confined spaces, excavation work, PPE, system of work permits, lifting, working on powered systems, traffic, work in high-risk situations, etc. Employers should define their Golden rules in accordance with the nature of work.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 23

- Material handling and storage safety. Special protocols will be followed for the safe handling and storage of rails, sleepers, switch components and pre-stressed concrete elements.
- Railway-Specific Traffic Safety. Traffic safety measures will be implemented at crossings, sidings, and along active rail corridors to prevent conflicts between construction crews and train operations. Safety marshals and signaling will be used during track works.
- Construction PPE. According to the Regulation on the Use of Personal Protective Equipment in Workplaces, suitable PPE will be selected, distributed, and tracked for all employees.
- OHS training. In accordance with Article 17 of OHS Law and the Regulation on OHS Training, mandatory initial and periodic trainings will be conducted for all employees.
- Occupational health surveillance. Per the Regulation on Workplace Physicians and Other Health Personnel, regular medical examinations will be ensured to verify fitness for duty.
- Refuse to work policy. Article 13 of OHS Law grants employees the right to stop work in case of imminent danger. This right must be formally implemented in D+B Contractor(s) procedures.

These standard requirements will be prepared in consistent with national OHS legislation, the World Bank Group (WBG) EHSs and GIIPs.

PIU will include into the bidding documents these OHS standard requirements that all D+B contractors and sub-contractors will meet under this Project. The CSC will review and approve D+B contractors' safety plans and procedures.

### **OHS Staff**

In addition, OHS plans, will among other issues, include the following: the D+B contractor(s) will define an OHS accountability matrix for all staff including Project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities. Each D+B Contractor must have its own qualified OHS staff that will be responsible for the implementation and supervision of the OHS program.

### **Risk Assessment**

All D+B contractors are required to develop risk assessment analysis to identify hazards and OHS risk at the workplace. The D+B contractors will develop risk management plans, including Risk Assessment Procedures, to mitigate OHS risks to be cleared by CSC. The procedure should aim to establish and maintain a safe working environment, including that workplaces, machinery, equipment, and processes under their control are safe and without health risk. The D+B Contractors must keep the training records.

### **Safety Standards and PPE**

D+B Contractor(s) will provide a safe workplace; therefore, a risk assessment will be completed before the commencement of any construction activities, and safety measures will be implemented in accordance with applicable safety standards WB guidelines and national legislation. All employees will strictly follow Golden rules for life threatening works (OHS rules that cannot be broken under any circumstances), which will be enforced under contractual matrix of consequences (see draft ESMP of INRAIL). The employer will provide special clothing, footwear, and other PPE to employees free of charge. Such PPE is to be delivered to employees involved in work related to the elimination of the consequences of accidents and natural disasters. When the PPE is dysfunctional, the employer is obliged to replace PPE at their own expense without the employee's responsibility. If the employee purchases PPE at their own expense, the employer is obliged to reimburse such costs.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 24

All contracts between AYGM and contractors will include a provision explicitly stating that continuous violation of OHS measures will result in contract cancellation. Contractors/subcontractors are required to incorporate this provision into their employment contracts with workers, specifying that continuous violation of OHS measures will lead to termination of employment.

### **OHS Trainings**

The employer is responsible for providing OHS training to employees in language understandable to the workers before the work is commenced on:

- General principles of health and safety.
- Working procedures, equipment, machinery, and manual and instructions for the use and repair of work equipment.
- Emergencies and evacuation plans, and their implementation activities.
- Existing threats and risks and on measures to be taken with regards to overcoming such situations.

D+B contractors will control the access to the construction site only to authorized people and verify if workers are meeting training and accreditation requirements in accordance with the set training standards and applicable regulatory requirements<sup>4</sup> (i.e., workers must be trained to perform hazardous works such as working at heights, confined spaces, welding etc.). All workers must complete at minimum an OHS induction to have access to the construction site.

### **OHS Committee**

There will be a construction OHS committee with representatives of employees, AYGM, D+B contractor(s) and all subcontractors.

Given the size, geographic spread, and complexity of the Project, section-specific OHS Committees will be established by the D+B Contractors for their respective work areas, in line with national OHS legislation, to address location-specific risks and work activities. These committees will convene on a monthly basis, as required by applicable legislation.

Measures will be taken to promote inclusive representation within OHS Committees, including encouraging the participation of female workers, raising awareness on gender equality in OHS processes, and considering gender balance in the nomination of employee representatives, where feasible.

Biweekly, OHS meetings will be conducted to discuss preventive measures, deviations and non-compliances, accidents, and corrective actions. D+B contractors will conduct internal OHS surveys and audits to verify compliance of OHS practices. Non-compliances will be documented and reported internally. A time frame for a corrective action will be set and followed up. Daily OHS briefings will be conducted before the commencement of the works highlighting the hazards and preventive measures from each job. D+B contractors will document and report to AYGM all accidents and illnesses with a day lost or more, fatalities or serious injuries that may happen at the work site.

### **First Aid**

There must be on site resources for first aid and for more serious injuries. Furthermore, there must be medical doctors on site and a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers.

---

<sup>4</sup> In Türkiye, the performance of high-risk and specialized work—such as operating heavy vehicles, cranes, and electrical systems—requires mandatory certification and licensing in accordance with national legislation. Truck drivers must possess the appropriate class of driver's license (e.g., C, CE, or D class) and, in the case of transporting hazardous materials, additional certification such as the SRC 5 and ADR license. Crane, forklift, and other lifting equipment operators must hold valid operator certifications issued by authorized institutions such as the Ministry of National Education or the Vocational Qualifications Authority. Similarly, electricians are required to hold an Electrician License or equivalent qualification and, where applicable, be trained for high-voltage operations in accordance with the Electrical High Current Facilities Regulation. All such certifications are part of employers' due diligence obligations under Türkiye's OHS Law No. 6331.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 25

### **Worker's Accommodation**

If accommodations are provided for workers, Contractors will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightning protection, separate cooking and eating areas. There will be separate facilities provided for men and women. The contractors will be required to prepare Worker's Camp Management Plan (WCMP) prior to commencement of works as part of their Contractor's Environmental and Social Management Plan (C-ESMP) in line with "Workers' Accommodation: processes and standards A guidance note" by International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD). The WCMP will at minimum include the following elements:

- Camp Siting and Layout: Selection of camp location to avoid sensitive areas, with proper drainage, fencing, and safe access.
- Occupancy Standards: Provision of adequate space per worker in dormitories, appropriate ventilation, natural light, and temperature control.
- Sanitation and Hygiene: Availability of gender-segregated, functional and clean toilets, showers, and handwashing stations in line with national standards.
- Potable Water and Food Services: Safe drinking water supply and hygienic catering facilities; food storage and waste management protocols.
- Medical Facilities and First Aid: On-site or nearby access to first aid kits and health care services, emergency response plans.
- Security and Safety Measures: Controlled entry/exit, fire safety systems, lighting, and personal safety measures for all residents.
- Waste Management: Systems for solid and liquid waste collection, disposal, and pest control.
- Monitoring and Reporting: Regular inspections, camp condition assessments, and compliance reporting to PIU and supervision consultant.

These standards will be further detailed in bidding documents and monitored regularly by the CSC and the PIU's Social and OHS specialists.

### **Code of Conduct (CoC)**

The CoC reflects the company's core values and overall working culture. The content of the CoC is included in the World Bank Standard Procurement Document and includes provisions relating to SEA/SH prevention. It is also presented in Annex-2. The D+B contractor will develop and implement CoC.

Training sessions will be conducted as needed for all D+B contractors' and subcontractors' workers to ensure understanding and application of the CoC and the stated principles. Each worker is required to sign the CoC, indicating that they have received, understood, and acknowledged it as a mandatory condition of employment. For non-Turkish speaking workers, reasonable measures will be taken to ensure understanding of the CoC, including through translation into relevant languages and the provision of accompanying trainings or explanations, as appropriate. The CoC will be prominently displayed in a readily accessible location(s) by workers.

### **Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)<sup>5</sup>**

Project workers are prohibited to commit any acts of SEA/SH. To address SEA/SH risks:

- Project workers will be required to sign CoC at the start of employment.

---

<sup>5</sup> Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6). Sexual abuse is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5). Sexual harassment is any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 26

- SEA/SH prevention training will be provided for all project workers at induction, with regular refreshers throughout the project cycle.
- A dedicated, confidential SEA/SH grievance mechanism, separate from the general WGM, operated by trained personnel is established (see Section 8.1) and described in the SEP—which will be made publicly available—to ensure that all project workers are informed about how to submit a SEA/SH-related grievance and that confidentiality will be maintained.
- Implementation of SEA/SH mitigation measures will be monitored through the CSC.
- SEA risk mitigation will be integrated in community engagement activities to ensure that affected groups are aware of their rights and reporting channels.

These measures will be refined as part of the D+B Contractors' LM Plans. In line with ESS2, ESS4, and the World Bank's Good Practice Note on SEA/SH for major civil works.

### **Forced Labor**

All employment relationships will be formalized through SGK, and CSC will require contractors to demonstrate full legal registration of workers and adherence to labor rights. Moreover, workers will receive training on forced labor, contractors will be contractually obliged to conduct regular audits of their subcontracting chain and provide access to WGM that allow anonymous reporting of forced labor.

### **Working Hours**

The risk of exceeding working hours in violation of Law No 4857 will be regulated through the WGM and regular audits. Clauses stipulating termination of the contractor's contract in case of persistent non-compliance will be incorporated into the contractual agreements to control the risk of overworking.

### **Labor Influx**

The project will require D+B contractor(s) to implement CoC and appropriate labor camp standards. The D+B contractor(s) will prepare a Labor Influx Management Plan prior to commencement of works as part of their C-ESMP, and the project's SEA/SH mitigation strategy. These plans will involve sensitization and awareness campaigns among the project workers and the local community, including but not limited to CoC and grievance mechanism. The influx of non-local workers, even if relatively contained, will be monitored through CSC and periodic community engagement carried out by PIU.

## **5.1 Monitoring and Reporting**

The D+B Contractor(s) will be required to provide monthly information on the performance in terms of labor and OHS issues including their subcontractors' to CSC. PIU will include in the contract(s) as requirement for D+B contractors to report on issues such as number of accidents rates, severity rates, number of recurring non-compliances, violations of Golden rules, fatalities and serious injuries, and penalties for non-completion. These monthly reports will also include number of workers engaged in the Project activities, trainings provided and statistics about WGM. The level of detail to be included in these reports will be further provided in the Project Operations Manual to be prepared by PIU. D+B contractor's monthly report will be reviewed by the CSC's team.

Additionally, the D+B contractor shall report to CSC about any inspections and audits carried out by the respective ministries such as the Labor Inspection. The findings of the labor audits will be presented to PIU and the Bank, if requested.

The CSC will conduct periodic supervision of contractor's OHS performance, including site visits, at least weekly. These supervisions will cover compliance with above mentioned OHS standards, ESS2, accidents, violations of golden rules, recommendations, and progress of ongoing corrective actions. The CSC will compile non-compliance reports monthly and send to PIU.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 27

PIU will conduct periodic supervision including site visits, at least bi-weekly and consolidate its own monitoring results per ESS2 and EHSG requirements (including OHS and SEA/SH), the monthly non-compliance reports of CSC and D+B contractors' implementation reports and incorporate them into the Environmental and Social Monitoring Report (ESMR) to be sent to the World Bank quarterly.

### **Reporting on accidents and incidents**

Following the provisions of Article 14, which pertains to the "Registration and Notification of Work Accidents and Occupational Diseases" as outlined in Law No 6331, employers are mandated to report occupational accidents to the SGK within three workdays of the incident. Additionally, occupational diseases, as reported by health service providers or the workplace doctor, must be communicated within three workdays from the date of discovery.

Within the context of the Project, the D+B contractor will also notify the CSC within 12 hours about any incident or accident related to the project which has or is likely to have a significant adverse effect on the environment, the affected communities, the public or workers (labor, health and safety, or security incident, accident, or circumstance, i.e. due to which the employee is unable to work for three consecutive working days, as well as SEA/SH incidents and any dangerous event that may put health and safety of the employees at risk.)<sup>6</sup>, but no later than 24 hours after the occurrence of the event. D+B contractor(s) will include relevant provisions in their contracts with their subcontractors so that the D+B contractor(s) can notify the CSC within 12 hours of the occurrence of the significant event happened in subcontractor's site, such as subcontractors will be contractually required to notify the D+B contractor within 6 hours of the occurrence of any significant incident.

Subsequently, the CSC will inform PIU within 24 hours of receiving the notification from the D+B contractor, and in any case no later than 48 hours after the occurrence of the event. and the PIU will inform the World Bank within 48 hours—but no later than three calendar days after the occurrence of the significant event.

After the notification, it is the responsibility of the D+B contractor(s) to prepare a root-cause report along with a corrective action plan (CAP), submit to the CSC within 7 calendar days of the event. CSC will review this report, if necessary, request revisions, and submit to PIU within 15 calendar days of the event. The PIU will review the report and, if necessary, request revisions, forwarding the finalized report to the World Bank within 30 calendar days of the event.

All significant incidents will be reported using the World Bank Environment and Social Incident Response Toolkit (ESIRT) template, which will be annexed to the C-ESMP. The PIU and CSC will ensure that contractors and subcontractors are trained on ESIRT classification and reporting requirements prior to commencement of works.

---

<sup>6</sup> Such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members, SEA/SH allegations or property damage.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 28

## 6 AGE OF EMPLOYMENT

Since the national legislation prohibits child labor to be engaged in hazardous works, the minimum working-age in this project will be 18 years of age.

All formal employment contracts must be registered with the SGK, which requires valid identity documentation, thereby effectively ensuring that only individuals above the legal minimum working age are employed. The age verification procedure at recruitment will be as follows:

- 1) At the time of recruitment, all applicants must present an official national ID card or passport.
- 2) Human Resources staff verify the date of birth against the legal minimum working age (18) and record this in the recruitment file.
- 3) Prior to engagement, the employment contract is registered with the SGK, which requires valid identification and automatically blocks under-18 registrations.
- 4) Subcontractors are contractually required to apply the same procedure and to keep verified ID copies in their personnel files.

However, attention will be paid to labor arrangements with subcontractors and primary suppliers, where informal practices may occur. To mitigate this, D+B Contractors will monitor subcontractors' compliance, include contractual obligations for formalizing employment relationships through SGK and conduct random spot checks to ensure subcontractor compliance. Awareness sessions on national child labor laws and SGK will also be conducted, and WGM will remain open for anonymous or formal reporting of violations.

Any breach of the Regulation on Working Procedures and Principles of Child and Youth Workers will result in the termination of the contract with the respective contractor or subcontractor.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 29

## 7 TERMS AND CONDITIONS

Direct and contracted workers will be governed by the stipulations of Labor Law No 4857. Consequently, wages, working hours, maximum working hours, annual leaves, and all other rights and benefits outlined in Law No 4857 will be applicable. Employers are obliged to address the following considerations:

- Recruitment procedures will adhere to principles of transparency, publicity, equal opportunity and non-discrimination based on ethnicity, religion, sexual orientation, disability, gender, and other criteria specified in Law No 4857. No form of discrimination will be tolerated concerning any aspect of the employment relationship, encompassing recruitment, compensation, working conditions, terms of employment, access to training, promotion, or termination of employment.
- A predefined application procedure will be established prior to the commencement of the recruitment process.
- Clear job descriptions, outlining the required skills for each position, will be provided in advance of recruitment.
- All project workers will receive written contracts containing job description, working hours, wages, rights and duties, CoC etc. prior to start working.
- All workers, regardless of the duration of their employment (including those hired for a month or less), will have written contracts detailing the terms and conditions of work. The contents of the contract, including the CoC, will be explained to the workers, who will sign the employment contract before commencing their duties. For individuals who may have difficulty understanding written documentation, an oral explanation of the employment conditions will be provided.
- Terms and conditions of employment will be accessible at work sites.
- Unskilled labor will be preferentially recruited from affected communities and nearby settlements. This will be added into D+B Contractor(s) bidding document.
- Employees will be notified at least one month before the termination of their employment contract.
- Contracted workers will not bear any hiring fees. If hiring fees are incurred, these will be covered by the contractors or subcontractors.
- All migrant workers will have identical working conditions and terms of employment (e.g., remuneration, overtime, working hours, weekly rest, holidays with pay, safety, health, termination of the employment relationship, and any other relevant conditions of work) as non-migrant project workers performing the same type of work.
- Contractor firms will fully adhere to national labor legislation regarding wage payments.
- Terms and conditions of direct workers, who are employed as consultants, are determined by their individual contracts, in line with the Labor Code.
- The work hours are 45 per week for contracted workers. All project workers will receive at least one rest day (24 hours) after six consecutive days of work.
- Employees working over seven and half hours a day are entitled to at least a 60-minute break, employees working less than four hours a day are entitled to 15-minute breaks, while employees working between four and seven and half hours a day are entitled to 30-minute breaks during working hours.
- Employees employed are entitled to a paid weekly uninterrupted 24-hour rest period. The weekly rest is normally on Sunday. However, an employer may determine another day for using the weekly rest, should the nature or organization of work so require.
- The project workers shall have a right to annual, sick, and parental leave as provided in the Labor Law of Türkiye.
- All wages earned, social security benefits, unused leave time, pension contributions and any other entitlements will be paid on or before termination of employment contract. The notice periods shall be compliant with Turkish Labor Law requirements.
- The employment contracts between the contractor and the worker will comply to Turkish legal requirements and shall include the job description, working hours, working

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 30

conditions, wage level (including payment for overtime). In addition, workers will be provided with drugs and alcohol policy and workers Code of Conduct. A copy of the contract will be signed by both parties and a copy of the employment contract will be provided to the worker. Contractor may request employees to work overtime, not exceeding 270 hours per year, as stipulated in the Labor Law. Further, the employee's consent shall be required for overtime work, in January each year, as required by the Labor Law.

- The Project contractors should adopt this LMP as a part of their contract and will set out terms and conditions for the contracted workers in their Labor Management Plans. These terms and conditions will be in line, at minimum, with this LMP, Turkish Labor Law (No 4857), Occupational Health and Safety Law (No 6331) and General Conditions of the World Bank Standard procurements documents.
- Workers' identification documents, including passports and personal IDs, shall not be retained by D+B contractors under any circumstances, in line with national labor legislation and World Bank ESS2 requirements.

The D+B contractors' LM Plan will set out terms and conditions for the contracted workers. These terms and conditions will be in line, at minimum, with this LMP, national Labor Law and General Conditions of the World Bank Standard bidding documents and comparable industry standards and will be subject to CSC's approval.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 31

## 8 WORKERS GRIEVANCE MECHANISM

AYGM, currently has a grievance mechanism in place which allows all of its employees to raise workplace concerns. Pursuant to Article 21 of Law No. 657 (Civil Servants Law), Civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible.

The complaint must be concluded within 30 days, from date of receipt of the first disciplinary supervisor authorized to decide. Civil Servants who exercise their right to complain cannot be fined for their complaints.

In line with the requirements of ESS2, the Project's Workers' Grievance Mechanism (WGM) is established by PIU for its direct workers who are not civil servants. The WGM will be accessible, confidential, and responsive, and aims to address workplace concerns related to employment terms, conditions, rights, and work environment in a timely and impartial manner. It covers grievances related to:

- Conditions of employment (pay, working hours, leave, etc.)
- Occupational health and safety concerns
- Discrimination or harassment
- Disciplinary actions
- Any breach of contract or unfair treatment

This WGM will be implemented as follows:

- **Submission.** Complaints can be submitted verbally, in writing, or electronically (e.g., email or online form). The social expert within the PIU will be responsible for receiving complaints.
- **Acknowledgment:** Grievances will be acknowledged within 2 working days of receipt.
- **Investigation and Resolution:** All complaints will be assessed and resolved within 10 working days, depending on complexity. Workers will be kept informed of progress.
- **Escalation:** If the complainant is not satisfied with the outcome, the case may be escalated to a higher level within the PIU, i.e. deputy director or director of PIU. Deputy director or director of PIU will also receive grievances if the subject of the complaint is the social expert of PIU.
- **Confidentiality and Non-Retaliation:** The identity of complainants will be protected, and no worker will face retaliation for raising concerns in good faith. The grievance mechanism will also allow for the submission of anonymous complaints.

All grievances will be recorded in a secure grievance log including date of submission, issue raised, resolution status, and closing date. PIU will periodically review grievance trends.

Posters or brochures outlining the grievance procedure and contact points will be displayed at PIU office.

WGM is based on the following principles:

- Workers will be informed about WGM at the time of their recruitment, and their employment contracts will involve detailed information of WGM including the ways they can convey their grievances and how these grievances will be recorded, handled, and monitored.
- The process will be transparent and allow workers to express their concerns and file grievances at any time.
- All grievances will be treated in a fair and respectful manner.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 32

- Management will treat grievances seriously and take timely and appropriate action in response.
- WGM will not prevent workers to use any other judicial mechanisms provided by the national laws.

PIU will require D+B Contractor(s) and CSC to develop and implement a WGM for their workers, prior to the start of works in line with the PIU's WGM described above to ensure that all contracted workers have access to a fair, transparent, and prompt mechanism to express concerns or grievances, and to resolve complaints at the earliest possible stage to promote a harmonious working environment and safeguard labor rights. If the D+B contractors and CSC have an already established WGM, they can utilize that WGM provided that it is in line with the principles and procedures described in this section and records regarding the Project are kept separately.

The WGM of D+B Contractor(s) will be a part of their LM Plan.

In line with the WGM described above, D+B Contractor(s) and CSC WGM will include, at minimum:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes (ensure that suggestion boxes at workplaces will be opened on a weekly basis), email address, a telephone hotline, focal point department.
- stipulated timeframes to respond to grievances and to address cases.
- a register to record and track the timely resolution of grievances.
- a responsible department to receive, record, address, and track resolution of grievances.

The requirements for D+B Contractor(s) to establish WGM before the mobilization phase and to operate and maintain throughout the subproject activities will be incorporated in the bid documents. D+B Contractor(s) require their subcontractors to establish their own WGM and incorporate into D+B Contractor(s)' WGM.

The CSC will monitor the contractors' recording and resolution of grievances, and report these to PIU in their monthly progress reports. The process will be monitored by the social expert of PIU. This social expert will maintain the WGM database with the inputs from D+B Contractor(s) WGM and CSC WGM to enable monitoring of the Project's WGM.

## **8.1 Sexual Exploitation and Abuse / Sexual Harassment**

In accordance with ESS2 and ESS10, the Project WGM includes a dedicated and confidential mechanism to receive, manage, and resolve complaints related to SEA/SH. This mechanism is aligned with survivor-centered principles and accessible to all project workers (excluding civil servants), and is consistent with the arrangements set out in the SEA/SH Action Plan and the Accountability Response Framework.

All workers will be informed about their rights and the grievance channels during induction training, including specific procedures for SEA/SH cases as outlined in the Code of Conduct (Annex-2).

Workers may report SEA/SH grievances through social expert, deputy director or director of PIU (especially in case the social expert is the alleged perpetrator), and a web site form which allows anonymity, including options to direct the grievance (social expert, deputy director or director of PIU).

SEA/SH-related complaints will be managed based on the following survivor-centric principles:

- Confidentiality will be strictly upheld; details will only be shared on a need-to-know basis.
- Non-retaliation will be guaranteed; workers who file SEA/SH grievances will be protected from any form of reprisal.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 33

- Informed consent will be obtained before any referral or further action is taken.
- Respect and dignity will be maintained throughout the process.

Once a SEA/SH grievance is received:

- The social expert (or deputy director or director) will inform WB's social expert who is responsible from INRAIL within 24 hours.
- If urgent support is needed, the survivor will be immediately referred to the Ministry of Family and Social Services call center (ALO 183).
- The survivor will be informed of available options and decide whether to proceed with a formal investigation or resolution.
- An investigation plan will be prepared under the guidance of WB's social expert.

To ensure effective implementation

- All PIU, CSC and contractor staff with grievance responsibilities will be informed that they should notify the social expert, deputy director or director of PIU as soon as they received any SEA/SH grievance without further investigation and maintaining full confidentiality (without informing anyone)
- SEA/SH training will be provided to all workers under induction training underlining the examples of cases and the existing of SEA/SH grievance mechanism and channels to communicate SEA/SH grievances.
- Refresher training will be held annually, and tailored sessions will be provided for newly hired staff.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 34

## 9 CONTRACTOR MANAGEMENT

AYGM will use the World Bank's 2021 Standard Procurement Document (SPD) for solicitations and contracts, incorporating labor and OHS requirements.

As part of the process to select design and build contractors who will engage contracted workers, the PIU and/or the supervision consultant may review the following information:

- Information in public records, for example corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies,
- Business licenses, registrations, permits, and approvals,
- Documents relating to a labor management system, including OHS issues, for example LM Plans,
- Identification of labor management, safety, and health personnel, their qualifications and certifications,
- Workers' certifications/permits/training to perform required work,
- Records of safety and health violations, and responses,
- Accident and fatality records, along with notifications to authorities,
- Records of legally required worker benefits and proof of workers' enrollment in related programs (i.e., training records, vocational certificates, risk assessments),
- Worker payroll records, including hours worked and pay received,
- Identification of safety committee members and records of meetings,
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

The contracts with selected contractors will include provisions related to labor and OHS, as provided in the World Bank SPD and Turkish law.

The CSC will manage and monitor the performance of D+B Contractor(s) in relation to contracted workers, focusing on compliance by D+B contractors with their contractual agreements (obligations, representations, and warranties). This may include periodic audits, inspections, and/or spot checks of project locations or work sites and/or labor management records and reports compiled by D+B Contractor(s). D+B Contractor's labor management records and reports may include:

- A representative sample of employment contracts or arrangements between third parties and contracted workers,
- Records related to grievances received and their resolution,
- Reports relating to safety inspections, including fatalities and incidents, and implementation of corrective actions,
- Records relating to incidents of non-compliance with national law, and
- Records of training provided for contracted workers to explain labor and working conditions and OHS for the project.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page 35

## 10 PRIMARY SUPPLY WORKERS

The primary suppliers shall be companies that manufacture goods and materials essential for the construction and operation of the Project, including but not limited to structural steel, prefabricated concrete elements, rail tracks, signaling systems, electrical cabling, and other critical infrastructure components. These sectors, particularly construction materials and electrical systems supply chains, may present certain occupational safety risks due to the nature of industrial production and handling. Although child labor and forced labor are not widespread or systemic issues in Türkiye’s formal industrial supply chains due to stringent labor regulations and mandatory social security registration, potential risks may still arise, especially among small-scale subcontractors or informal labor arrangements. Therefore, contractors will be required to carry out a due diligence procedure when engaging local suppliers, to ensure that no child labor, forced labor, or serious safety risks are present in their operations.

In instances where international suppliers are contracted—particularly for specialized railway technology or electrical systems—contractors will be required to assess during procurement whether such suppliers have been previously accused or sanctioned for child or forced labor, or for labor-related safety violations. This process will also include a review of the supplier’s corporate policies and compliance standards related to labor rights and safety. If any risks related to child labor, forced labor, or critical safety shortcomings are identified during due diligence, the PIU will develop appropriate mitigation procedures, including contract clauses, monitoring protocols, and supplier disqualification processes, as necessary.



<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page: Annex-2/4

## Annex-2 Sample Code of Conduct

### **CODE OF CONDUCT PROJECT WORKERS<sup>7</sup>**

We are the Contractor, *[enter name of Contractor]*. We have signed a contract with *[enter name of Employer]* for *[enter description of the Works]*. These Works will be carried out at *[enter the Site and other locations where the Works will be carried out]*. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “Contractor’s Personnel” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel.

Our workplace is an environment where unsafe, offensive, abusive, or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

#### **Required Conduct**

Contractor’s Personnel shall:

- 1) carry out his/her duties competently and diligently,
- 2) comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Contractor’s Personnel and any other person,
- 3) maintain a safe working environment including by:
  - a. ensuring that workplaces, machinery, equipment, and processes under each person’s control are safe and without risk to health,
  - b. wearing required personal protective equipment,
  - c. using appropriate measures relating to chemical, physical and biological substances, and agents, and
  - d. following applicable emergency operating procedures,
- 4) report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health,
- 5) treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children,
- 6) not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel or members of communities located around work places,
- 7) not engage in sexual exploitation which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In World Bank financed projects/operations, sexual exploitation occurs when

---

<sup>7</sup> This Code of Conduct (CoC) is adopted from the World Bank Standard Procurement Document, Request for Bids Small Works, March 2017. This CoC will be included by the bidder to the bidding documents and the awarded Construction Contractor will use the version she or he presented in the bidding document and will include this CoC to contracts with its subcontractors.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page: Annex-3/4

access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain.

- 8) not engage in rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape.
- 9) not engage of sexual assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks, do not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage
- 10) complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and sexual exploitation and abuse (SEA),
- 11) report violations of this Code of Conduct; and
- 12) not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project’s Grievance Mechanism].

### **Raising Concerns**

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor’s Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone at or in person at [ ]; or
2. [ ] Call [ ] to reach the Contractor’s hotline (*if any*) and leave a message.

The person’s identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

### **Consequences of Violating the Code of Conduct**

Any violation of this Code of Conduct by Contractor’s Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

### **For Contractor’s Personnel**

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor’s contact person with relevant experience in handling gender-based violence*] requesting an explanation.

<b>Labor Management Procedures</b>		<b>CNR-AYGM-INRAIL-LMP</b>
Final	January 2026	Page: Annex-4/4

Name of Contractor's Personnel: *[insert name]*

Signature : \_\_\_\_\_

Date : *[day/month/year]* \_\_\_\_\_

Countersignature of authorized representative of the Contractor

Signature : \_\_\_\_\_

Date : *[day/month/year]* \_\_\_\_\_