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İşin Adı The Name of the Job	:	Mersin-Adana-Osmaniye-Gaziantep Yüksek Standartlı Demiryolu Hattı İnşaatı ile Elektromekanik Sistemlerinin Temini Construction of Mersin-Adana-Osmaniye-Gaziantep Hight Standard Railway Line With Supply Of Electromechanical Systems

Rapor Adı Report Name	:	# HSE DISCIPLINE PROCEDURE

Doküman Kodu Document Code	:	MAOG-RECU-GN-GNL-IS-GNL-PRG-0006-0

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İŞ SAĞLIĞI GÜVENLİĞİ & ÇEVRE

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1. PURPOSE

The purpose of this procedure is Ronesans Holding A.Ş. It is to determine the procedures and principles regarding the measures to be taken and the disciplinary process to be applied against the Occupational Health, Safety and Environmental rules violated by the employees during the studies carried out in the MAOG Project operating within the body of the Group Companies.

2. SCOPE

This procedure is carried out by Ronesans Holding A.Ş. and all subcontractor employees operating in the MAOG Project operating within the structure of its affiliated Group Companies (employees, interns, etc.).

3. REFERENCES

The content of this document has been developed to determine the minimum requirements for Ronesans Holding and all affiliated Group Companies; It can be developed according to the legal regulations of the working area, employer expectations and international standards.

- ISO 9001:2015 Quality Management System
- Ronesans Holding Disciplinary Regulations
- ISO 14001:2015 Environmental Management System,
- OHSAS 45001:2018, Occupational Health and Safety Management System
- Other HSE Requirements (Project (IFC, EBRD requirements etc. / Customer Requirements)

4. RESPONSIBILITY

5.1. Project Management:

MAOG Project Management is responsible for the implementation of this procedure in all worksite activities and ensuring that the subcontractors operating in the project also work in accordance with this procedure. MAOG Project Management is alsoresponsible for;

- Implementation of the prepared Project HSE Disciplinary Violation Procedure,
- To ensure that this procedure is transferred to its employees,
- Participating in disciplinary committees and taking an active role in the decision-making mechanism,
- Responsible for monitoring and developing the system for continuous improvement.

5.2. Department / Department Managers / Chiefs are also responsible for:

Department/Department Managers/Chiefs are responsible for the implementation of this procedure and ensuring that the subcontractors they work with work in accordance with this procedure in their activities in their own work area. Department / Department Managers / Chiefs are also responsible for:

- To ensure that this procedure is transferred to the employees,
- Responsible for monitoring and developing the system for continuous improvement.

5.3. Project HSE Department

The HSE Group (Manager, Chief, Engineer, Supervisors and other HSE personnel) is responsible for establishing and monitoring the necessary coordination for the implementation of this procedure in all field and operational activities. The HSE Department is also responsible for the fllowing:

- Providing training to employees and subcontractors on the scope of this procedure,
- Ensuring coordination with the managers/supervisors responsible for the activities in the field/enterprises for the implementation of this procedure,
- Organizing training and on-the-job talks to ensure the dissemination of this procedure,
- Following up the KPIs (Key Performance Indicators) prepared by the MAOG Project and reporting them to the MAOG Project Management,
- Creation and follow-up of award records,
- Monitoring and reviewing the effectiveness of this procedure and its implementation in accordance with its content, and for contacting the Group Company/Holding HSE Units in case of need for revision.

5.4. Holding/Group Company HSE Units

Holding and Group Company HSE Units are responsible for supervising the implementation of this procedure in projects/enterprises. Holding and Group Company HSE Units are also responible for;

- Preparing this procedure, reviewing it periodically and making revisions when necessary,
- Transferring this procedure to his employees.

5.5. Headquarter E&S Manager:

Responsible for managing infrastructure and superstructure projects regarding environmental and social governance issues and member of the Executive E&S Committee on behalf of the REC.

5.6. PIU (Project Implementation Unit)

- PIU Department Manager (Superstructure / Civil Engineer) will be responsible for overseeing the implementation of all health, safety and social measures, as specified within the disclosure package of the Project, and regular reporting to AYGM PIU.
- PIU Physics Engineer who is responsible for supervising health and safety for the Project

5.7. Executive Environmental and Social Management Committee

- **Executive E&S Committee Project Manager (Department Head / Branch Manager /Head of Department)** will be ultimately responsible for overseeing the activities undertaken by the AYGM/TCDD specialists (listed below), overseeing the implementation of mitigation measures and management procedures specified within the disclosure package of the Project, and overseeing the preparation and implementation of a CESMP, which will be based on this ESMP.
- **Executive E&S Committee Environmental, Health and Safety, and Social (EHSS) Manager (Specialist / Engineer)** will be responsible for overseeing all matters that relate to environment, health, safety and social aspects of the Project. Also, s/he will be appointed to be responsible for supporting the implementation of the SEP, by conducting regular consultation with affected communities on any concern regarding the Project. CLOs will also have responsibility for disseminating the Project disclosure package as described in the SEP. They will also conduct regular inspections of records relating to grievances received and their resolution. S/He will report regularly to AYGM PIU.

5. ABBREVIATIONS & DESCRIPTIONS

Holding: Ronesans Holding A.Ş.

HSE: Occupational Health and Safety and Environment

MAOG: MAOG (Mersin-Adana-Osmaniye-Gaziantep) High Standard Railway Project

Group Companies:RHI/RET, RTU, MEA, RTE, REC, RC, RSY, RMI, RGY, ROY, OPG, REN, RIH, DESNA,

İK: Human Resources Department

Unsafe Behavior: Any behavior that increases the likelihood of an accident by deviating/deviating from generally accepted HSE procedures or behavior specifically defined for doing the job. eg; using shortcuts to get work done, using damaged equipment, etc.

Unsafe Condition: Situations in which the workplace environment changes from an accepted safe state and which, if not corrected with appropriate action, can result in death, injury or damage.

GDF: Unsafe Behavior / Situation Monitoring Report Form

Disciplinary Violation: Violation of HSE rules set by Local Legislation, International standards, Holding Minimum Requirements or Group Company Plans and Procedures; Unsafe Behaviors/Situations encountered during the works carried out in the MAOG Project, contrary to the determined HSE rules and/or life-threatening

Dismissal: In case of non-compliance with the HSE rules determined by this Occupational Health, Safety and Environment Standard or the Procedures of the Group Companies, as required by the disciplinary violation, in accordance with the Labor Law No. Unilateral termination by companies.

Disciplinary Regulations: Ronesans Holding Disciplinary Regulation published by the Internal Audit Department.

Project / Business Management: Depending on the established organizational structure of the MAOG Project, it represents all the project responsible manager and/or its subordinates (the most organizationally authorized person or his/her representative in the Project).

HSE Disciplinary Committee In the MAOG Project, the board consisting of Project Site Chief, Project HSE Manager/Chief, Group Company HSE Coordinator/Manager, chaired by the Project Manager.

When necessary (eg after accidents with fatalities, multiple injuries or major effects), Holding HSE Unit, Group Company Regional Manager/Assistant General Manager/COO/General Manager is also included in the board.

Disciplinary Board: Its members are Ronesans Holding A.Ş. The Board, which consists of the Members of the Board of Directors, is a member of Ronesans Holding A.Ş. and Ronesans Holding A.Ş.'s direct or indirect subsidiaries and/or affiliated companies, as well as other companies in which the Holding is a shareholder, to the Ronesans Business Ethics and Code of Conduct Agreement, Ronesans Holding's Disciplinary Regulation, other internal regulations and procedures, determines the disciplinary penalties to be given to personnel who act contrary to the instructions of their supervisors, generally accepted practices, and the laws/laws/regulations of the relevant countries, and the actions to be taken in the event of the behaviors specified under the "Disciplinary Penalties" heading of the Ronesans Holding Disciplinary Regulation.

6. IMPLEMENTATION

APPENDIX A HSE Disciplinary Violation Form, which is added as an example, should be filled in by HSE Personnel and Field Managers/Supervisors in order to identify unsafe behaviors and situations and to prevent accidents with corrective measures to be taken.

7.1. Activities Subject to Disciplinary Violation Procedure

- Zero Tolerance Issues

In addition to the measures taken to improve Occupational Health, Safety and Environment practices in the MAOG Project and to prevent obvious absolute hazards from causing undesirable results, employees will be dismissed directly in case of violations in the determined issues. (Annex D Zero Tolerance Policy) These issues are outlined below.

1. Physically Attacking and/or Being Involved in Fighting
2. Using, Being Under the Influence, Providing, Possession of Alcohol and/or Drugs During the Work
3. Working at Height Without Taking/Applying Safety Precautions and Using Belts
4. Unauthorized Modifying / Destroying Scaffolding and Other Upgradeable Work Platforms
5. Driving within and/or outside the MAOG Project Site in Multiple Violations of Speed Limits
6. Unauthorized Modifying/Destroying Emergency Equipment
7. Disrupting/Disabling Safety Equipment (isolation devices/emergency shutoff valves, lockout/tagout devices, opening systems, relief valves, equipment guards, fire and gas alarm systems, alarms, crane computers, Onboard Monitoring Systems, etc.)
8. Attempting to Operate, Energize or Use Locked or Tagged Equipment
9. Using Construction Machinery Without a Valid License
10. Entering and Working in a Closed Area Working Area without His/her Authority.

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- Other Disciplinary Violations

In addition to the violations specified in Ronesans Holding's Disciplinary Regulation, in cases of violation of the HSE Rules detailed in Annex C of Activities Subject to Disciplinary Violation, the following penalties detailed in the Ronesans Holding's Disciplinary Regulation are applied after being approved by the relevant parties, in order of violation.

BREACH	**REMARKS**	**APPROVED BY (Ronesans Personnel Violation)**	**APPROVED BY (Subcontractor Violation)**
First Violation	Attract Attention (AA) (Requires written notice.	It will be valid with the approval of the Project/Operation Manager/Site Chief and the Project/Operation HSE Manager.	It will be valid with the approval of the Project/Operation Manager/Site Chief and the Project/Operation HSE Manager.
Second Violation	Warning (WA)		
Third Violation	Reprimand (KN)	• HSE Disciplinary Committee • Related Group Company Regional Manager/COO/Assistant General Manager	HSE Disciplinary Committee
Fourth Violation	Dismissal (D) (Unilateral termination of employment in accordance with the Disciplinary Procedure and HR procedures. The permission to enter the field is withdrawn indefinitely. (In case of employment in other group companies, it is recorded in the personnel file of the employee in accordance with HR procedures.)	• HSE Disciplinary Committee • Related Group Company Board Member, CEO and General Manager	HSE Disciplinary Committee

When necessary (eg after accidents with fatalities, multiple injuries or major effects), Holding HSE Unit, Group Company Regional Manager/Assistant General Manager/COO/General Manager is also included in the board.

Penalties applied to Ronesans Personnel will be reported to Ronesans Holding's Disciplinary Committee after their approval. The performance grade of the employee is reduced by 10% (ten percent) in the "Reproach" penalties given to Ronesans personnel. However, the penalty mentioned does not prevent promotion or benefiting from any rights granted by the company. At this point, the situations arising from the performance grade of the personnel after the penalty are exempt from the mentioned rule.

7.2. Activities that do not comply with HSE Laws and Procedures

If approved by the relevant parties, disciplinary punishment may also be imposed on persons who are not included in the Table of Activities Subject to Disciplinary Violation in Annex C, but who are found to carry out activities that do not comply with applicable occupational safety laws and procedures. Activities other than those specified in Annex C Table of Activities Subject to Disciplinary Violation will be defined in the Disciplinary Violation Procedure to be prepared by the MAOG Project.

By submitting the APPENDIX A Disciplinary Violation Notification Form stating the penalty requested on the MAOG Project HSE Manager/Chief, the descriptive report of the incident and supporting documents (report, picture, statement, defense, etc.) disciplinary action is applied.

7.3. Disciplinary Action Process

If it is determined by the HSE Staff, Field Supervisors or MAOG Project Management that the employees violate the security conditions and that disciplinary action is required, the following measures are applied:

MAOG Project Management, HSE Personnel, Field Supervisors fills out APPENDIX A HSE Disciplinary Violation Form and notifies the employee that he has violated the conditions and requests the employee's defense regarding the violation. The employee has to give his written defense within the same working day. If the employee refrains from giving a defense, the situation is recorded and the witnesses sign. After the employee's defense is received, the necessary disciplinary action is taken in accordance with the table in the Table of Activities Subject to Disciplinary Violation in Annex C.

The employee or his/her manager/supervisor; In cases where he does not accept the relevant disciplinary violation and refuses to sign the notification made to him, the ANNEX B HSE Disciplinary Violation Notification Form is signed by a witness to the relevant place and the disciplinary violation is documented.

The Holding and Group Companies reserve the right to promptly dismiss and/or dismiss any employee who takes part in their projects and businesses and who inflicts violence on themselves, colleagues, other workers or the facility or equipment, or which they believe may harm them.

In the MAOG Project, in case of disciplinary violations committed by visitors who are not within the scope of this standard, disciplinary action is applied in a single step and the violator is immediately removed from the work area.

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In case the disciplinary violation results in dismissal, the employee whose employment contract is terminated will be placed on the Renaissance Restricted List by HR and/or the relevant unit.

7. MONITORING, ASSURANCE AND VERIFICATION

Key success indicators (KPIs) of this procedure will be monitored, verified and evaluated by the relevant parties in accordance with their responsibilities set forth in the E&S Governance document, within the scope of the MAOG-RECU-GB-GNL-IS-PRG-0007-0 HSE Monitoring, Assurance and Verification Procedure.

8. APPENDICES

APPENDIX A- HSE Disciplinary Violation Notification Form

APPENDIX B- Activities Subject to Disciplinary Violation

APPENDIX C- Zero Tolerance Policy

ANNEX-B DISCIPLINE VIOLATION NOTIFICATION FORM

HSE DISCIPLINE VIOLATION NOTICE			
Name Surname (of the violating employee)		Registration No:	
Group Company/Project		Tick	
Date	……. /……. / …….	1. Attract Attenion	☐
Location		2. Warning	☐
Company (if subcontractor employee)		3. Reprimand	☐
This notice has been prepared due to the violation of the HSE rules in force of the project as detailed below during the work and includes a written notification of the warning made during your work.		4. Dismissal	☐

Details of the behavior/situation that led to the Disciplinary Violation

Necessary corrective measures (if any)

Possible Consequences of Uncorrected or Prevented Disciplinary Violation

We will notify you that repeated violations of the disciplinary rules notified to you and in force by the project or violation of other rules are grounds for dismissal.

Title	Name Surname	**Signature**	**Date**
Field Chief / Responsible Manager			
HSE Manager/Supervisor			
Employee (Witness in refusal to sign)			
Personnel Affairs / HR			

The field below will be filled in only for the Penalties of Reprimand and Dismissal.

Project Manager/OHS Disciplinary Committee/Audit Board Member Opinion/Approval	
Signature	Date: ……. /……. / …….

For Circulation: ☐M HSE Unit Subcontra☐r Personnel Affairs /☐R ☐ ☐

ANNEX-C ACTIVITIES SUBJECT TO DISCIPLINE VIOLATION

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
Not notifying or reporting work related accidents with High Potencial or Existing High Severity			RP	DS			RP	DS
Sharing Company/Project HSE statistics or accident information with third parties without authorization	DA	WR	RP	DS	DA	WR	RP	DS
Failure to provide work permit/temporary assignment when necessary					DA	WR	RP	DS
Not Having Risk Analysis and Emergency Action Plan					DA	WR	RP	DS
HEALTH AND SOCIAL SERVICES								
Polluting the environment and work area	DA	WR	RP	DS	DA	WR	RP	DS
Waste plastic, paper, hazardous, etc. not to be separated by classification in ways	DA	WR	RP	DS	DA	WR	RP	DS
Smoking outside of designated areas	DA	WR	RP	DS	DA	WR	RP	DS
Physically attacking and/or getting involved in a fight (ZERO TOLERANCE)				DS				
Using, being under the influence, providing, possessing alcohol and/or drugs while working (ZERO TOLERANCE)				DS				
The introduction of firearms, ammunition, explosives or lethal weapons (except for authorized security personnel or work tools)				DS				
REMOVING								
Use of lifting gear without inspection label/color	DA	WR	RP	DS	DA	WR	RP	DS
Lack of guide rope (sling)					DA	WR	RP	DS
Guide rope (sling) present but not used	DA	WR	RP	DS				

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
Lifting without a trained and authorized slinger					DA	WR	RP	DS
Use of obviously damaged equipment	DA	WR	RP	DS	DA	WR	RP	DS
Use of incorrect slings/lifting equipment/crane hooks	DA	WR	RP	DS	DA	WR	RP	DS
Lack of crane operator's operating certificate							RP	DS
Walking/working under suspended load		WR	RP	DS	DA	WR	RP	DS
Insufficient foot clearance / support	DA	WR	RP	DS	DA	WR	RP	DS
Lack of sling/lift plan or work when needed					DA	WR	RP	DS
WORKING AT HEIGHT								
Working above 1.8 m and/or at a height specified by local legislation, without using fall protection equipment and without taking safety precautions (ZERO TOLERANCE)				DS	DA	WR	RP	DS
Not using existing secure access	DA	WR	RP	DS				
Lack of secure access					DA	WR	RP	DS
Use of a damaged safety belt		WR	RP	DS	DA	WR	RP	DS
Safety belt not fastened 100% or not fastened sufficiently (ZERO TOLERANCE)				DS	DA	WR	RP	DS
FELL OBJECTS								
Unclosed gaps in the work area						WR	RP	DS

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
Unauthorized removal of gap covers			RP	DS		WR	RP	DS
Use of scaffolding without toe boards	DA	WR	RP	DS	DA	WR	RP	DS
Not connecting tools and equipment while working at a height that can be dropped	DA	WR	RP	DS	DA	WR	RP	DS
The arrangement and arrangement of the work area is such that it may cause work accidents and / or prevent / extend the time of escape in emergency situations.	DA	WR	RP	DS	DA	WR	RP	DS
Removing covers of manhole or floor openings without placing barriers and obtaining permission from the Administrator			RP	DS				
SCAFFOLDING								
Using scaffolding without scaffolding tag or with a red tag		WR	RP	DS		WR	RP	DS
Modifying/destroying scaffolding and other elevating work platforms without authorization (ZERO TOLERANCE)				DS				DS
Lack of secure access					DA	WR	RP	DS
PERSONAL PROTECTIVE EQUIPMENT								
Not using suitable and necessary PPE for the job (helmet, boots, goggles, breathing mask, parachute type safety belt, etc.)	DA	WR	RP	DS				
Improper use of PPE (damaged etc.)	DA	WR	RP	DS				
Non-standard PPE supply					DA	WR	RP	DS
EXCAVATION								

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
No barricade set up or the excavation set closer than 1.0 m from the edge					DA	WR	RP	DS
Unauthorized removal of the installed barrier		WR	RP	DS		WR	RP	DS
No warning light					DA	WR	RP	DS
Lack of valid permit for excavation at the depth specified in the procedures	DA	WR	RP	DS	DA	WR	RP	DS
Working in an unsafe excavation area	DA	WR	RP	DS	DA	WR	RP	DS
Failure to provide safe and convenient access					DA	WR	RP	DS
Use of the excavation site without safe and convenient access	DA	WR	RP	DS				
Electrical Safety								
Use of electrical equipment without inspection (Color Coding) label/color	DA	WR	RP	DS	DA	WR	RP	DS
Use of damaged cable	DA	WR	RP	DS	DA	WR	RP	DS
Use of incorrect or damaged sockets	DA	WR	RP	DS	DA	WR	RP	DS
No Lockout/Tagout (LOTO) application							RP	DS
Absence of work permit (when required)	DA	WR	RP	DS	DA	WR	RP	DS
Lack of electrical safety equipment (e.g. residual current relay) or faulty or disabled							RP	DS

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
CONFINED SPACES								
No valid work permit						WR	RP	DS
Watcher not present or on duty (non-gas hazard)	DA	WR	RP	DS	DA	WR	RP	DS
Watcher not present or on duty (with -gas hazard)			RP	DS			RP	DS
There is no warning-notice-information board to prevent entry to the field.					DA	WR	RP	DS
Lack of ventilation or not degassing of the enclosed space								DS
Oxygen/gas tests not performed or documented in the Work Permit System (PTW)	DA	WR	RP	DS	DA	WR	RP	DS
No entry registration	DA	WR	RP	DS	DA	WR	RP	DS
Failure to provide secure access					DA	WR	RP	DS
LIGHTING								
Insufficient lighting of the work area, access and escape routes					DA	WR	RP	DS
Not using it even though there is sufficient lighting	DA	WR	RP	DS				
Inadequate barriers around the work area (night work)					DA	WR	RP	DS
Unauthorized removal of barriers (night work)	DA	WR	RP	DS	DA	WR	RP	DS
Use of poorly illuminated, damaged or inoperative mobile equipment	DA	WR	RP	DS	DA	WR	RP	DS

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	**2.**	**3.**	**4.**	**1.**	**2.**	**3.**	**4.**
Not using a reflective vest	DA	WR	RP	DS	DA	WR	RP	DS
HIGHWAY TRANSPORTS								
Not using a seat belt (Driver)			RP	DS				
The passenger next to the driver does not control the use of the seat belt	DA	WR	RP	DS				
Talking on a cell phone while driving			RP	DS				
Use of operating machinery or equipment contrary to the current operating procedure or without the consent and / or knowledge of the authorized supervisor	DA	WR	RP	DS				
Using vehicles and work machines without a valid license (ZERO TOLERANCE)				DS			RP	DS
Lack of training and documentation required by project conditions					DA	WR	RP	DS
Vehicle without valid inspection certificate	DA	WR	RP	DS	DA	WR	RP	DS
Exceeding the specified speed limits or driving at high speed inside and/or outside the operation/project area			RP	DS				
EMERGENCY								
Changing emergency equipment without authorization or damaging emergency equipment (Deactivating all kinds of work safety and fire equipment or relocating them without informing the relevant unit, etc.) (ZERO TOLERANCE)				DS				
General								
Intentionally avoiding the use of safety devices or rendering mechanical safety devices/guards inoperative.	DA	WR	RP	DS	DA	WR	RP	DS

Activities Subject to Disciplinary Violation Procedure	Employee's Fault				Manager/Supervisor Fault			
	1.	2.	3.	4.	1.	2.	3.	4.
Welding or cutting near flammable and combustible materials without securing the area/area.	DA	WR	RP	DS				
Carrying or leaving gasoline, alcohol and other flammable liquids open or spilled	DA	WR	RP	DS				
Sleeping in active workspaces	DA	WR	RP	DS				

APPENDIX C – ZERO TOLERANCE POLICY