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ENVIRONMENTAL MANAGEMENT PLAN

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1. PURPOSE

The Environmental Management System, as a goal and a principle, encourage all OzU faculty, staff, students, visitors, on-campus businesses/lessees, neighbors, affiliated contractors, and suppliers to take the necessary actions, meet the necessary requirements, and provide all of the necessary information and resources in order to protect the environment.

The Energy Management System is an integral part of the Environmental Management System, and energy management is addressed within the scope of environmental management. To that end, Özyeğin University aims to contribute to sustainability by continuously improving its energy performance across various dimensions, including energy efficiency, energy utilization, and overall energy consumption.

2. SCOPE

The Energy Management Plan covers the requirements of the Environmental Management System. This plan is applicable to all the Özyeğin University faculty, staff, students, visitors, subcontractors, and business partners, and covers the Özyeğin University Çekmeköy Campus Facilities. Subcontractors and business partners may develop their own Environmental Management Plans for their own operations in line with Özyeğin University's Environmental Management Plan. However, in such a case, they must obtain the approval of the HSE Department at Özyeğin University in order to maintain alignment and coordination with Özyeğin University's Environmental Management Plan. They must also obtain approval of the Energy Manager at Özyeğin University for energy-related matters.

The Environmental Management Plan includes the terms and conditions of the ISO 14001:2015 Environmental Management Systems Standard and ISO 50001:2018 Energy Management Systems Standard. Embracing a life cycle approach, the plan includes the practices and continuous improvement efforts of all units at Özyeğin University, enhancement of the environmental performance, evaluation of environmental aspects and impacts, achievement of goals and objectives, fulfillment of legal compliance obligations, as well as internal and external issues, contexts, ongoing activities and services, and any potential environmental risks and opportunities. Furthermore, the plan also covers the relevant terms and conditions to establish, implement, maintain, and improve an energy management system that enables to adopt a systematic approach for the continuous improvement of Özyegin University's overall energy performance which involves energy efficiency, energy utilization, and energy consumption.

The Environmental Management Plan is used together with and is an integral part of the Health and Safety Plan.

Özyeğin University established its Environmental Management System pursuant to the ISO 14001:2015 Environmental Management Systems Standard, and the 50001:2018 Energy Management Systems Standard as well as effective laws and regulations. Özyeğin University's Environmental Management System and Energy Management System cover **higher education activities, and social and administrative services**.

3. **DEFINITIONS**

3.1. Terms Related to Management Systems

Management System: A set of interrelated or interacting elements of an organization to establish policies and objectives, and processes to achieve those objectives.

Organization: A person or a group of persons vested with responsibilities, powers, relations and functions to achieve their objectives.

Senior Management / Top Management: A person or group of people who direct and control an organization from its highest level.

Relevant Party (preferred terminology), stakeholder (acceptable terminology): An individual, group, or organization who may affect, be affected by, or perceive itself to be affected by a decision, or an activity.

Risk: The effect of uncertainty.

Risks and opportunities: Potential adverse effects (threats) and potential positive effects (opportunities)

Documented Information: Information that need to be controlled and maintained by an organization, and the medium in which this information is stored.

Process: A series of interrelated or interacting activities that transforms inputs to outputs.

Inspection: A systematic, independent, and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the inspection criteria are fulfilled.

Corrective Action: An activity conducted to eliminate the root cause of a nonconformity and prevent its recurrence.

Continuous Improvement: Repeated activities undertaken to improve performance.

Indicator: A measurable representation of the status or condition of operations, management, or conditions.

Monitoring: Determining the status of a system, process, or activity.

Measurement: The process to determine a value.

Performance: A measurable result.

Compliance obligations: Legal or any other requirements that an organization has to or chooses to comply with.

3.2. Terms Related to Environment

Environmental Management System: A section of the management system used to manage environmental aspects, fulfill compliance obligations, and address risks and opportunities.

Environmental Policy: The overall intentions and direction of an organization related to its environmental performance as formally expressed by senior management.

Environment: Surroundings in which an organization operates, including air; water; land, natural resources, flora, fauna, humans, and their interrelation.

Environmental aspect: An element of an organization's activities, products or services that may impact, or does impact, the environment.

Environmental impact: The result of a positive or negative change to the environment caused wholly or partially from an organization's environmental aspect.

Prevention of pollution: The use of processes, practices, techniques, materials, products, services, or energy to (either individually or collectively) prevent, reduce, or control the generation, emission, or discharge of any pollutant or waste, with the aim of minimizing adverse environmental impacts.

Life cycle: Consecutive and interlinked stages of a product or a service, from raw material acquisition or generation from natural resources to final disposal.

Environmental performance: Performance pertaining to the management of environmental aspects.

Environment: The surroundings in which an organization operates. Environment also includes air; water; land, natural resources, flora, fauna, humans, and their interrelation.

Waste: Hazardous or non-hazardous material that is planned to discarded by its owner and that must be either duly disposed of or recycled for environmental protection.

Hazardous Waste: Waste that poses potential threats to public health or the environment and therefore that must be collected, transferred, stored and disposed of separately as per Rules and Regulations for Hazardous Waste Management.

Medical Waste: Pathological or non-pathological, infectious, chemical or pharmaceutical waste as well as sharps and containers generated by medical units.

Emission: Air pollutants discharged into the atmosphere, especially due to burning fossil fuels or the like;

- Synthesis, dissolution, evaporation and other similar processes;
- Storage, sorting, handling, transfer and other mechanical processes.

Recyclable Waste: Solid or liquid waste which is generated from domestic or industrial sources and can be recycled back to the economy after going through a series of chemical/physical treatment processes at recycling facilities (Paper, cardboard, plastic, metal, glass, fuel oil, used oil etc.).

3.3. Terms Related to Energy

Energy related terms and their definitions are provided in the EMP-05 Energy Management Procedure.

4. ENVIRONMENT POLICY

The Özyeğin University Çekmeköy Campus Facilities, as a goal and a principle, encourage all their faculty, staff, students, visitors, on-campus businesses/lessees, neighbors, affiliated contractors, and suppliers to take the necessary actions, meet the necessary requirements, and provide all of the necessary information and resources in order to protect the environment.

The Energy Management System is an integral part of the Environmental Management System, and energy management is addressed within the scope of environmental management. To that end, Özyeğin University aims to contribute to sustainability by continuously improving its energy performance across various dimensions, including energy efficiency, energy utilization, and overall energy consumption.

In all of its activities, Özyeğin University strives to carefully evaluate any potential environmental hazards to reduce environmental risks to acceptable levels, satisfy the requirements of internal and external authorities, and turn these requirements into opportunities. Likewise, Özyeğin University guarantees that it will protect the environment, help reduce environmental pollution, increase energy efficiency, comply with the effective legislations, satisfy the compliance obligations, analyze its environmental aspects and impacts, and continuously improve its environment management system to increase its environmental performance.

Sustainable resource use for environmental protection entails recycling, putting emphasis on water quality, air quality, and energy performance, minimizing climate change, and protecting biodiversity and ecosystems.

Özyeğin University senior management guarantees that they will duly fulfill all of its commitments, take the lead for the Environmental Management System, and ensure quality assurance for all of these processes.

The Özyeğin University Environmental Policy has been delineated in **POL-EMP** and is accessible to visitors and the relevant parties either as softcopy on the university website or as hardcopy in printed documents.

5. ENVIRONMENTAL MANAGEMENT GOALS

The environmental purposes and goals have been defined, considering significant environmental aspects and relevant compliance obligations, along with a thorough assessment of opportunities and risks.

Environmental purposes:

- Are consistent with the environmental policy.
- Are measurable.
- Take into account Significant Energy Uses (SEU).
- Consider opportunities for improving environmental performance.
- Are systematically monitored.
- Are duly communicated.
- Are duly updated.

When planning to achieve environmental objectives, the following aspects are clearly defined:

- Actions to take,
- Necessary resources,
- Assigned responsibilities,
- Completion timelines,
- Evaluation criteria for assessing results.

The integration of activities intended for achieving environmental objectives with other business processes has been assessed. The goals, objectives, and performances are monitored via the SMP-34 Goals and Performance Table.

Environment Management aims to:

- Eliminate all the hazards at the source in order to provide a clean environment to all the stakeholders and employees,
- Minimize, reuse and/or recycle waste,
- Take preventive and protective measures for operations in line with effective legislation on environment and energy,
- Create a culture of Environmental Protection, Waste Management, Water Management, and Energy Efficiency, and make sure it is embraced by all stakeholders with a collaborative approach,
- Organize scheduled training and periodic inspections on Environmental Protection, Waste Management, Water Management, and Energy Efficiency for all levels to raise stakeholders' awareness and increase their know-how,
- Minimize the use of natural resources such as electricity and water.
- Use energy resources efficiently, opt for renewable/alternative energy resources, recycle waste energies, and prevent potential leaks,
- Follow technological developments and opt for equipment and services with environmentally friendly technologies, designs and methods,
- Prioritize energy and environmental performance in new investment and improvement projects.

6. INSTITUTIONAL CONTEXT

6.1. Understanding the Organization and its Context

As per the environmental management system, internal and external issues have been determined in order to achieve goals and objectives, and identify risks affecting environmental performance. These issues should cover environmental conditions that are affected by the organization or have the potential to affect the organization. The organization's context is determined based on interacted parties and naturally arising needs. The internal and external issues of the organization are formulated, taking into account the organization's scope and the needs and expectations of relevant parties. In this context, internal and external issues as well as risks and opportunities have been identified and are provided in SMP 09-05 Contexts (Internal and External Issues - Risks and Opportunities).

6.2. Understanding Relevant Parties' Needs and Expectations

At Özyeğin University, relevant parties have been identified within the scope of the Environmental Management System. The needs, expectations, and compliance obligations of these relevant parties are regularly monitored and reviewed. To that end, SMP 09-06 List of Relevant Parties' Needs and Expectations has been documented.

7. DOCUMENTATION, DISSEMINATION, AND REVISIONS

7.1. Publication and Revisions

The Environmental Management Plan and its annexes are reviewed at least once in a year, and the necessary revisions are made and put in place. In case of one of the following conditions, interim reviews and revisions can also be made:

- Any change to the university facilities/layout/systems that might affect the execution or the content of the Environmental Management Plan,
- Any change to equipment and materials available for use,
- Any major incidents/accidents,
- Any major amendment to the legislations or any major findings obtained during internal or external audits.

The Environmental Management Plan and its annexes are reviewed and the necessary revisions are made by the HSE Department in collaboration with relevant parties. Revised documents are disseminated to relevant stakeholders. In case of the aforementioned circumstances, subcontractors and business partners must also review their own Environmental Management Plans for their own operations; make the necessary revisions; and have the approval of the HSE Department at Özyeğin University again.

Faculty, staff, and students must also review their own roles and responsibilities under the light of the changing world needs and technological advancements, and report any need for change in the plans to the HSE Department.

7.2. Dissemination

The relevant parts of the approved Environmental Management Plan and its annexes are disseminated to students, faculty and staff by HSE Coordinator either as hardcopy and softcopy. All documents are also kept accessible online.

7.3. Record Keeping

The Environmental Management Plan and any other record such as plans, forms, or reports prepared to maintain compliance with the effective laws and legislations are kept for 10 years by the authorized units, unless otherwise is stipulated by legislations.

8. ENVIRONMENTAL SUSTAINABILITY CULTURE

The Environmental Management System must be designed in a way to ensure that it is adopted by students, faculty and staff, and made an integral part of their lives. It should always be remembered that all students, faculty, staff, subcontractors, and business partners of the University are integral parts of the Environmental Management System. Therefore, the systems to be established must incorporate all points of view and take everyone's opinion into consideration.

Measures taken and rules set will be shared through a series of training programs and in booklets specifically designed for each group of stakeholders. Where necessary, the subcontractors and business partners of the University will also put their own Environmental Management Plans in writing for their own operations, and have them approved by the HSE Department. HSE Coordinator will determine if there is any need for coordination to implement these measures; and if so, will make the necessary arrangements.

Özyeğin University promotes and supports organizing training programs, seminars, events, and other similar activities to foster the environmental sustainability culture.

9. ORGANIZATIONAL STRUCTURE AND ROLES & RESPONSIBILITIES

The organizational structure of Özyeğin University is described with an organization chart and announced to all faculty and staff. Any new role and responsibility to be added to the current organizational structure are determined based on the effective laws and legislations.

9.1. Leadership and Commitment

The senior management at Özyeğin University consistently demonstrates its leadership and commitment to the continuous improvement of the effectiveness and performance of its Environmental Management System. To that end, the senior management takes responsibility and assigns responsibilities. The senior management also guarantees to establish the organization's environmental policy and objectives, and makes sure that these are in alignment with the organization's scope and strategic direction. Through its environmental policy, the senior management has committed to ensuring the proper implementation of the environmental management system within the organization, improving environmental performance, and taking necessary actions for the continuous improvement of its effectiveness. The organization proves its commitment as follows:

- Identifies the scope and boundaries of its Environmental Management System,
- Identifies the purposes and goals of its Environmental Policy, and makes sure that they are in compliance with its strategic direction,
- Ensures that the requirements of its Environmental Management System are integrated with the its processes,
- Makes sure that action plans are approved and implemented,
- Provides the necessary resources for the Environmental Management System,
- Communicates the importance of effective environmental management and compliance with Environmental Management System requirements, and organizes periodic meetings with the staff,

- Makes sure the Environmental Management System produces the intended outcomes,
- Establishes an environmental and energy management team,
- Guides and supports people who will contribute to the effectiveness of the Environmental Management System and improvement of energy performance,
- Supports other managerial roles to enable them to demonstrate the implementation of their leadership in their respective areas of responsibility,
- Makes sure that environmental performance is properly represented,
- Facilitates the establishment and implementation of necessary processes to identify and address environmental performance within the scope and boundaries of the Environmental Management System as well as changes which will affect the Environmental Management System,
- Identifies and provides resources needed such as trained professionals, plants, equipment, and machinery, information, and finances,
- Emphasizes the importance and necessity for providing services in compliance with legal requirements (i.e. standards), and the requirements of relevant parties, and makes necessary resources readily available.

9.2. General Roles and Responsibilities

All faculty, staff, and students are expected to:

- Know and adhere to the Environmental Management Plans,
- Take part in training sessions,
- Report any incidents they witness or become aware of, and recommend solutions,
- Throw their waste into the containers designated as per the Waste Management Plan with the 3R (Reduce-Reuse-Recycle) approach,
- Adhere to the measures taken for the conservation of natural resources and the improvement of water and energy performance, and provide recommendations for further enhancement,
- Ensure their own well-being and safety first in case of a dangerous situation and/or an accident, and then report the incident to the authorities.

9.3. Roles and Responsibilities of Management Representative

Management Representative is responsible for building, implementing and improving a holistic Environmental Management System for Özyeğin University. The roles and responsibilities of Environmental Management Representative are as follows:

- Makes sure the Environmental Management System is built, implemented, and continuously improved in compliance with ISO 14001:2015 Environmental Management Systems Standard, ISO 50001:2018 Energy Management Systems Standard, and the effective legislations,
- Tracks the general performance of the Environmental Management System, identifies rooms for improvement, and reports improvement opportunities to university management for approval,
- Plans and allocates all the necessary resources in order to ensure the safety and well-being of all students, faculty, staff, subcontractors, and business partners of the University.

9.4. Roles and Responsibilities of HSE Coordinator

HSE Coordinator is responsible for keeping in charge of all procedures and rules pertaining to building, implementing, and improving Özyeğin University's Environmental Management System. The roles and responsibilities of the HSE Coordinator are as follows:

- Prepares and keeps up to date the necessary documentation to make sure the Environmental Management System is built, implemented, and continuously improved in compliance with ISO 14001:2015 Environmental Management Systems Standard, ISO 50001:2018 Energy Management Systems Standard, and the effective legislations,
- Plans and performs hazard assessments and risk analyses for all operations and locations,
- Keeps track of effective legislations, informs relevant units about any change thereto which might affect the operations, and plans and implements the necessary measures,
- Keeps in charge of the implementation and maintenance of the Environmental Management System and conducts systematic audits to ensure its effectiveness and efficiency,
- Reviews the results of internal system audits, starts corrective/preventive improvement actions, and follows up on the findings of audits,
- Determines the training needs to ensure the effective execution of the Environmental Management System, organizes training in coordination with Human Resources/Student Services and prepares the necessary training materials and documents,
- Assesses the need for any corrective action after an accident or incident,
- Evaluates all third party requests/complaints, and starts and follows up on corrective actions,
- Makes sure the records kept and data obtained during evaluations, assessments, reviews, and tests are periodically analyzed; and reports the results both to the Health, Safety and Environment (HSE) Board and to top management.

9.5. Roles and Responsibilities of the On-Site Physician

Our On-Site Physicians are outsourced, and they report to HSE Coordinator. The roles and responsibilities of the On-Site Physician are explained in SMP-01 Health Center Procedure. These roles and responsibilities also notified to our on-site physicians.

9.6. Roles and Responsibilities of HSE Board

The roles and responsibilities of the HSE Board members are set forth in SMP-02 Occupational Health, Safety and Environment Board Procedure. These roles and responsibilities also notified to the members of the HSE Board.

9.7. Roles and Responsibilities of Laboratory Specialists

The roles and responsibilities of laboratory specialists are explained in SMP-03 Laboratory Safety Procedure. These roles and responsibilities are also notified to our laboratory specialists.

9.8. Roles and Responsibilities of HR Department Head

The roles and responsibilities of the Human Resources Department Head are as follows:

• Identifies training needs for environmental and energy management,

- Prepares and implements training plans,
- Evaluates and assesses training outcomes,
- Contributes to the promotion of environmental sustainability culture within the organization.

9.9. Roles and Responsibilities of Operations Director

Operations Director is responsible for the management and coordination of the Purchasing, Administrative Services, Technical Services, Transportation, and Energy unit heads.

9.10. Roles and Responsibilities of Purchasing Specialists

The roles and Responsibilities of Purchasing Specialists are as follows:

- Makes sure the environmental and occupational health is taken into account when determining the specifications of a material or equipment that is needed for the University,
- Evaluates the performance of suppliers / subcontractors / contractors / service providers which provide products or services for the University in terms of their compliance with the rules and regulations for occupational health, safety and environment,
- Opts for equipment, materials or services that contribute to minimizing environmental impacts and using energy efficiently,
- Where a chemical material is needed/to be procured, obtains and compares the material against MSDS during the selection process, and recommends the least harmful one,
- Works in coordination with HSE Coordinator to prepare informative and awareness-raising activities for employees who handle chemical materials so as to raise their awareness of the effects of these chemicals on environmental and occupational health.

9.11. Roles and Responsibilities of Administrative Services Manager

The roles and responsibilities of Administrative Services Manager are as follows:

- Searches waste collection and disposal facilities and coordinates the contractual process,
- Provides and places suitable containers for waste collection in compliance with the Waste Management Plan,
- Facilitates the delivery of waste to the authorized waste collection organizations and keeps the necessary records,
- Reports any non-compliance with the Waste Management Plan or any new type of waste generated to HSE Coordinator,
- Ensures that lessees, on-campus businesses, and subcontractors are directed towards waste, water, and energy management practices that effectively reduce environmental impacts.

9.12. Roles and Responsibilities of Technical Services Manager

The roles and responsibilities of Technical Services Manager are as follows:

• Makes sure the Environmental Management System is implemented, documented, and improved in compliance with ISO 50001:2018 Energy Management Systems Standard, and effective legislations,

- Follows up on and coordinates any new construction or renovation of buildings from conception to completion in order to ensure they are completed using environmentally friendly material and methods,
- Coordinates all legally required evaluation and assessment activities in compliance with the Emergency Response, Health & Safety, and Environment Management Plans, and reports findings to the HSE Coordinator,
- Develops and implements new operational procedures to minimize environmental impacts and energy consumption,
- Plans and implements maintenance and repair programs,
- Checks and improves equipment in terms energy efficiency,
- Ensures that suppliers minimize their environmental impacts in terms of waste, water and energy,
- Recommends system improvements.

9.13. Roles and Responsibilities of Transportation Manager

The roles and responsibilities of the transportation manager are as follows:

- Ensures that actions are taken to reduce carbon emissions through arrangements that promote the use of public transportation instead of private vehicles etc.,
- Monitors the maintenance and repair needs of vehicles to increase their energy performance and reduce their environmental impacts,
- Supports innovative projects aimed at increasing environmental performance in transportation processes.

9.14. Roles and Responsibilities of Energy Manager

The roles and responsibilities of Energy Manager are delineated in SMP-05 Energy Management System Procedure.

10. SUPPLIER/SUBCONTRACTOR/BUSINESS PARTNER/ CONTRACTOR MANAGEMENT

10.1. General Principles

All subcontractors, business partners, and contractors operating on the Özyeğin University premises must comply with the Environmental Management Plan and its annexes, as well as all the effective laws and legislations. All the parties above must conduct their own risk assessments, take their own precautions, and where necessary craft their own Environmental Management Plans and Emergency Response Plans and have them approved by the HSE Coordinator at Özyeğin University, and adhere to the instructions of the HSE Department.

All suppliers / subcontractors /business partners /contractors of Özyeğin University are selected and evaluated based on their Environmental Protection, Waste Management, and Energy Efficiency performances and practices. The operations of the aforementioned parties are carefully monitored by the respective unit heads, in compliance with the rules delineated in SMP-04 Subcontractor/Business Partner/Contractor Management Flowchart.

Furthermore, periodic audits to be performed on Suppliers/Subcontractors/Business Partners/Contractors as well as periodic audit reports and records to be requested are specified in SMP-27 Evaluation and Assessment Plan.

10.2. Procurement- Purchasing

In all purchasing and procurement processes, environmental aspects and impacts of products, services, or materials to be purchased are taken into account. Necessary assessments are performed in terms of waste management and water efficiency.

In energy services which substantially affect or have the potential to substantially affect energy consumption, energy performance is reviewed, and the final decision is made accordingly.

In the purchasing processes of products, services or materials, reminders are made to minimize environmental impacts through specifications. Environmental compliance provisions are incorporated into agreements and contracts. With the inclusion of the SMP 04-01 Supplier Brief and Letter of Undertaking Form as an annex to the contract, environmental sustainability considerations and necessary precautions are explicitly communicated. Additionally, the supplier is required to declare its commitments to these aspects through the form.

11. ENVIRONMENTAL PROTECTION AND RISK MANAGEMENT

Occupational health, safety, and environmental hazards are determined for all operations and parties based on the effective laws and legislations on occupational health, safety, and environment as well as energy. All subcontractors, faculty, staff, and business partners are liable for identifying hazards and contributing to risk management. Adopting a proactive approach is imperative to conduct risk analyses before the start of any operation. The following situations may lead to new risks which may affect all or a part of the workplace. In such a case, risk assessment is revised either wholly or partially.

- a) Relocation or any change pertaining to buildings,
- b) Any change to the technologies, materials, and equipment employed at the workplace,
- c) Any change to production/service management,
- d) Any occupational/environmental accident, disease, or close call at the workplace,
- e) A legislative amendment to the threshold limit values set for the work environment,
- f) Any change called upon by the results of a measurement or a health assessment conducted at the work environment,
- g) A new external hazard which may impact the workplace.

The procedure to follow when conducting risk assessments and the method to employ for prioritizing hazards are explained in SMP-09 Risk Management Flowchart and its annexes.

All faculty, staff, and students must immediately report any hazardous situation or behavior to HSE Coordinator. Such notifications can be made via email at <u>solutioncenter@ozyegin.edu.tr</u> or <u>hse@ozyegin.edu.tr</u>.

11.1. Environmental Aspects

Within the scope of the Environmental Management System, operations, products, and services as well as their relevant environmental aspects and impacts have been assessed with the life cycle approach. The life cycle stages of a product or service include raw material acquisition, design, production, transportation/shipping, usage, end-of-life processing, and final disposal. These are delineated in EMP-04 Environmental Life Cycle.

In determining environmental aspects, changes to current and new activities, products and services, and emergency situations have been duly considered. In addition to directly controlled environmental impacts, environmental aspects that the university may affect have also been identified. These may pertain to products or services supplied by others as well as services offered by the University.

Environmental aspects have been evaluated pertaining to the operations, products, and services such as below:

- a) Design and development of facilities, processes, products, and services,
- b) Raw material acquisition, including extraction,
- c) Operational or manufacturing processes, including storage,
- d) Operation and maintenance of facilities, operational assets, and infrastructure,
- e) Environmental performance, and practices of external suppliers,
- f) Product transportation and service delivery, including packaging,
- g) Product storage and end-of-life processing,
- h) Waste management, including reuse, renewal, recycling, and disposal.

Environmental aspects and impacts are delineated in SMP 09-04 Environmental Aspect and Impact Assessment.

11.2. Identification of Risks and Opportunities

Risks and opportunities have been identified within the scope of the Environmental Management System by taking into consideration the expectations and needs of stakeholders related to internal and external issues, in order to make sure the Environmental Management System achieves desired outcomes, as well as to increase positive effects, to prevent or reduce undesirable effects, and facilitate continuous improvement. Risks and opportunities are specified in SMP 09-05 Contexts (Internal and External Issues- Risks and Opportunities).

12. COMMUNICATION AND AWARENESS MANAGEMENT

12.1. General Principles

Özyeğin University builds the necessary structure to share with and obtain insights from its stakeholders about the impacts of its activities on its stakeholders and possible ways to manage these impacts. This also entails notification of the relevant parties and taking the necessary actions based on a careful analysis of the feedback received.

12.2. Communication with Third Parties

Özyeğin University's Environmental Policy is announced to all relevant parties via the University website. In case of any particular activity which may have implications on the surrounding community, the HSE Coordinator and the Corporate Communications Department Head will contact the people to inform them and keep their records. Should anyone wish to obtain information about our Environmental Protection, Waste Management, and Energy Efficiency activities, they may contact the HSE Department, and information is provided in coordination with the HSE Coordinator. Auditors from public bodies are welcomed in coordination with the HSE Coordinator and presented with audit documents. Official audit findings are handled based on SMP-28 Non-Conformity Management Process Flowchart.

12.3. Raising Awareness

Özyeğin University also offers training to all students, faculty, staff, subcontractors, and visitors in order to raise their awareness about their share of roles and responsibilities in ensuring the effective implementation of the Environmental Management System. Furthermore, campaigns, posters, and brochures also contribute to raising the awareness of students, faculty, staff, subcontractors, visitors, and the public in general.

12.3.1. Competency Description

The required education, training, knowledge, and skills for all faculty, staff, and subcontractors to pursue their operations as per the Environmental Management principles and the effective legislations are described in SMP-15 Competency Matrix. Descriptions also include the required training they need to receive based on their job definitions. The records of the described education, training, knowledge and skills are kept in the personnel files or, in case of subcontractors, by the relative unit managers.

12.3.2. Training

Özyeğin University offers training to all students, faculty, staff, subcontractors, and visitors in order to ensure the effective implementation of the Environmental Management System. Training programs are planned annually in coordination with the HSE Department as per the effective legislations, using SMP-16 Annual Training Plan. Training plans are prepared in consultation with employees or employee representatives. In case of new recruitments or any change which may cause new risks emerging, additional training is included in the annual training program. In case of any amendment to the effective legislations or any new risks emerging due to work conditions, it is ensured that employees receive the necessary training, regardless of the annual training plan. The annual training plan shows the subject, date, duration, target audience, learning objectives, and learning outputs of each training.

Training can be in-class, or practical, or alternatively, may be delivered by means of informative texts. All delivered training programs are recorded using SMP-17 Training Participants List. Should participants be awarded certificates of participation at the end of any training, the original copies are presented to participants, and a copy of the certificate is kept in the personnel file of the participant.

The success of each training in achieving the planned learning objectives is evaluated through the method determined by the HSE Department and is recorded. As a result of the evaluations, the necessary actions are identified and taken by the HSE Department.

12.3.2.1. Students

Newly admitted students are exposed to an orientation program. The content of the orientation program is delivered to students, along with the SMP-18 Campus Safety Guide. Each student who attended the orientation program and received the Campus Safety Guide is recorded by Student Services.

Any change to the University's Environmental Protection, Waste Management practices are notified to students via email or internal announcements throughout their period of study at the University. The University also makes use of events, competitions, seminars and posters to raise awareness and promote current practices to increase their effectiveness. To this end, student clubs are encouraged to develop new projects.

12.3.2.2. Visitors

All national and international visitors visiting Özyeğin University or participating in on-campus events are signed in by the security units and each visitor is issued a visitor badge. SMP-18 Campus Safety Guide provides information to all visitors about potential hazards that might arise on campus, campus rules, and emergency response procedures.

12.3.2.3. Faculty and Staff

An orientation program is offered to all newly recruited faculty and staff members, and each delivered orientation program is recorded. During their term of employment, faculty and staff also are provided with a series of training programs listed in the SMP-16 Annual Training Plan. Each delivered training program is recorded. Any change to the Environmental Protection, Waste Management and Energy Efficiency practices are notified to faculty and staff via email, internal announcements, or meetings.

12.3.2.4. Subcontractors/Business Partners/ Contractors

All subcontractors, business partners, and contractors are responsible for training their own staff. These organizations submit their annual training plans to the respective unit manager and the HSE Coordinator at the beginning of the year. Furthermore, they are responsible for submitting the qualifications of each staff member, the records of all the training they have delivered, and the training evaluation records to the Özyeğin University authorities. Özyeğin University will also provide these organizations with the necessary training on Environmental Protection and Waste Management, and will keep a record of each delivered training. Meanwhile, should there be any need for additional training as a result of an accident/incident or any on-campus change, such training will be planned and delivered in coordination with the HSE Department.

Contractors must fulfill the requirements listed in SMP-15 Competency Matrix. In the event that their operations are not covered by the matrix, then they are required to prepare their own matrix and have it approved by the HSE Coordinator.

13. WASTE MANAGEMENT

Özyeğin University endeavors to minimize, reuse and /or recycle any potential waste in order to prevent environmental pollution.

In selecting materials, systems, and methods, careful attention is paid to the selection of more energy efficient options in order to reduce waste at the source, and minimize waste or loss.

Waste management entails the minimization of waste at the source, sorting, temporary storage, interim storage, transport, recycling, and disposal of waste as well as post-disposal controls. Özyeğin University adopts the zero waste approach. Any potential waste which may be generated as a result of administrative/academic/social activities is determined, and the necessary actions are taken to minimize, sort, and recycle waste in compliance with EMP-01 Waste Management Plan.

14. ENERGY MANAGEMENT

Energy efficiency at Özyeğin University is maintained through an energy management system in which all administrative decisions and end user behavior are well-planned and continuously monitored with a robust and well-organized facility infrastructure. To that end, the University adopts a comprehensive approach to energy management. This approach covers energy management, facility infrastructure and facility management. The University uses its energy resources effectively, shows due care and attention for renewable and alternative energy resources, recycles waste energy, and minimizes its energy losses. Furthermore, the University closely follows up on technological developments, and places a special emphasis on energy efficient technologies. In all new investments, improvement projects, energy performance and environmental friendliness are always prioritized as key considerations. Detailed information about energy management is provided in EMP-05 Energy Management System Procedure.

The rules for energy efficiency and environmental protection which must be observed by all students, faculty, and staff are further explained in detail in EMP-02 User Guidelines for Campus Energy and Water Resources.

15. WATER MANAGEMENT

Özyeğin University is committed to minimizing water consumption and reusing water. To ensure the preservation and sustainability of water resources, water consumption is monitored, reported, and minimized through a continuous improvement approach. The University aims to improve its water efficiency and performance, and adopt innovative technologies to minimize environmental impacts related to water throughout its life cycle. Drinking water is also obtained using technological solutions. The rules for energy efficiency and environmental protection which must be observed by all students, faculty and staff are further explained in detail in EMP-02 User Guidelines for Campus Energy and Water Resources.

16. ACCIDENT/INCIDENT MANAGEMENT

In order to improve the hazard identification and risk assessment practices, identify potential accidents/emergencies, and plan the necessary corrective and preventive measures, all hazardous situations/behaviors, close calls, and accidents must be reported to the HSE Department.

Necessary precautions are taken against any spills and leaks that may occur during the transportation, storage, and use of environmentally hazardous materials.

All rules and methods for reporting, recording, investigating, and taking and implementing precautions for hazardous situations/behaviors, close calls/near misses and accidents are explained in SMP-20 Hazardous Situation/Behavior, Near Miss and Accident Management Flowchart and its annexes.

All hazardous situations/behaviors and near misses/close calls must be reported to <u>solutioncenter@ozyegin.edu.tr</u> or <u>hse@ozyegin.edu.tr</u>. All reported cases are investigated, analyzed, and reported by the HSE Department. Collected data is then used to revise existing risk analyses and evaluate the performance of HSE management.

All rules to be observed during an emergency are explained in the ERP-Emergency Response Plan.

17. SUSTAINABILITY AND CHANGE MANAGEMENT

Prior to implementing any changes that might affect the current processes and services, Özyeğin University examines their potential impacts on the University's environmental performance, identifies hazards, assesses risks, and takes the necessary actions due diligently to ensure that the University's current environmental performance is kept intact. The HSE Department and the respective department head are jointly responsible for setting out and implementing a list of rules to review, replace, or terminate any risk control that is no longer needed or that has become ineffective due to any changes to the University's operation, layout, and activities.

18. MONITORING AND IMPROVEMENT OF ENVIRONMENTAL PERFORMANCE

The performance of the environmental processes and the environmental management system is monitored and improved using the following tools. These tools are used in compliance with the effective legislations. Keeping the necessary records to monitor, evaluate and assess the performance, and recommending actions for improvement are the joint responsibility of all employees.

18.1. Legal Due Diligence and Compliance

The Environmental Management System is prepared pursuant to the effective legislations. All rules for monitoring, learning, examining, evaluating, and taking the necessary actions for compliance with the effective laws and legislations are described in SMP-26 Legal Due Diligence and Compliance Flowchart and its annexes.

18.2. Evaluation and Assessment

18.2.1. Evaluation and Assessment Actions

In order to monitor the performance of the environmental processes and management system and evaluate compliance therewith, a series of activities will be carried out including periodical assessments, measurements, and tests. In conducting such activities, the existing risk management practices and effective legislations will be taken into account, and the operations of all stakeholders will be included. At the beginning of each year, the HSE Coordinator plans the evaluation and assessment activities to be carried out that year in collaboration with the respective unit head, and follows up on the findings obtained using the SMP-27 Evaluation and Assessment Plan. In case of any non-compliance, the necessary actions will be taken in compliance with the rules set in SMP-28 Non-Compliance Management and Improvement Flowchart.

18.2.2. Evaluation and Assessment Tools

Environmental processes and management system are monitored with a series of measurements and tests to track their performance and evaluate compliance. In order to ensure the accuracy of the readings obtained, the tracking/testing/measurement equipment and devices are regularly checked, validated, and calibrated. The results of the checks and calibrations are kept by the respective unit manager, and a copy is submitted to the HSE Coordinator. The scope and the duration of the calibrations are determined jointly by the HSE Coordinator and the respective unit manager depending on the purpose of the equipment and the results of the previous calibrations. The calibrations of subcontractor equipment are also incorporated into this system. Calibrations are scheduled and carried out as per SMP-29 Measurement, Test and Experimental Equipment List.

18.3. Periodic Checks

The maintenance of plant, properties, and machines is planned, performed, and recorded. The maintenance periods are scheduled based on work conditions, climate, and the recommendations of the manufacturer. Any failures and technical problems are recorded for further inspection and analysis. The maintenance, repair, and operation of plant, properties, and machines are delineated in SMP-13 Facility Management and Maintenance & Repair Procedure.

18.4. Controls and Audits

Compliance with the requirements of the Environmental Management System is evaluated with a series of controls and audits. The scope and frequency of controls and audits depend on the volume of work at hand, and potential risks. The results of audits and controls are evaluated, analyzed and reported by the HSE Department.

18.4.1. Controls

The HSE Coordinator or an appointee designated by him conducts periodic facility/compliance checks using SMP-30 Facility/Compliance Checklist in order to make sure the rules stipulated are observed, hazards are predicted and prevented, and hazards missed, if any, are duly identified. Any non-compliance is reported to the authorities to take the necessary actions. All non-compliances are recorded and tracked by the HSE Department via Solution Center.

18.4.2. Audits

In order to evaluate the Environmental Management System in terms of its compliance with ISO 14001:2015 Environmental Management Systems Standard, ISO 50001:2018 Energy Management Systems Standard, and effective legislations, as well as its overall effectiveness and efficiency, a series of system audits are scheduled and performed. The findings of audits are carefully addressed. The rules for designating system auditors, scheduling and performing audits, and reporting and addressing the findings are described in SMP-33 System Audits Flowchart and its annexes.

18.5. Non-Compliance Management and Improvement Actions

As a testament to Özyeğin University's commitment to continuously improving its Environmental Management System, the rooms for improvement are reviewed and the necessary actions are taken based on the findings obtained from incidents, accidents, complaints, audits and checks, inspections, and evaluation and assessment activities. The applicable procedure for reporting, recording, and evaluating any non-compliance or rooms for improvement, identifying and planning the necessary corrective-preventive actions, and measuring the performance of such actions is delineated in SMP-28 Non-Compliance Management and Improvement Action Flowchart and its annexes.

18.6. Performance Indicators, Recordkeeping, and Reporting

Özyeğin University develops and monitors its key performance indicators to keep track of and continuously improve both the environmental performance of its processes and the performance of its Environmental Management System, with the ultimate goal of improving its overall environmental performance. Performance indicators are identified based on effective legislation and the general objectives determined by management. Measurable sub-objectives of general objectives; performance indicators to be used to evaluate to what extent these objectives are achieved, and the authorized persons for tracking and reporting these performance indicators are provided in the SMP-34 Objectives and Performance Indicators Table.

19. MANAGERIAL REVIEW AND MANAGEMENT PROGRAMS

Managerial review meetings are held at least once a year with the participation of the Rector, Management Representative, HSE Coordinator, Energy Manager, and respective unit managers. Prior to the meetings, all data obtained during the respective period is reported.

The content of the report and the agenda of the meeting should include at least the following:

- 1. Evaluation of the results of the previous management review meeting,
- 2. Any change to external and internal issues relating to the Environmental Management System,
 - Needs and expectations of relevant parties,
 - Legal requirements and other obligations,
 - Risks and opportunities,
 - Important environmental aspects,
- 3. Environment policy and the rate of achievement for environmental goals.

- 4. Information about the organization's environmental performance, including its tendencies in the following issues:
 - Incidents, non-compliances, corrective actions, and continuous improvement,
 - Evaluation and assessment results,
 - Assessment results for compliance with legal requirements and other obligations,
 - Results of inspections,
 - Guidance and employee participation,
 - Risks and opportunities,
 - To what extent goals and objectives are achieved,
 - Energy performance and improvement of energy performance based on evaluation and assessment results, including Energy Performance Indicators (EPI),
 - Status of action plans,
- 5. Sufficiency of resources for the continuity of an effective energy management system,
- 6. Communication with relevant parties,
- 7. Opportunities for continuous improvement,
- 8. Suggestions.

Managerial review outputs include decisions regarding the following:

- Acceptability, sufficiency, and continuous effectiveness of the environmental management system in achieving desired outputs,
- Opportunities for continuous improvement,
- Any necessary changes to the environmental management system,
- Necessary resources,
- Energy Performance Indicators (EPI) or Energy Baseline,
- Actions to take when environmental goals could not be achieved,
- Opportunities to develop the integration of other business processes with the environmental management system,
- Insights regarding the organization's strategic direction,
- Increasing qualifications, awareness, and communication.

Outputs pertaining to the senior management review are communicated to employees and employee representatives.

Decisions rendered during Management Review Meetings as well as the requirements, necessary resources, and roles and responsibilities to achieve the objectives are recorded and tracked using the meeting minute.

20. ANNEXES

EMP-01 Waste Management Plan EMP-02 User Guidelines for Campus Energy and Water Resources EMP-03 Instructions for Temporary Storage Areas for Hazardous and Non-Hazardous Waste EMP-03-01 Instructions for Delivery and Transport of Hazardous Waste EMP-03-02 Checklist for Temporary Storage Areas for Hazardous Waste EMP-03-03 Temporary Hazardous Waste Storage Area Delivery Form EMP-03-04 Hazardous Waste Label EMP-03-05 Temporary Hazardous Waste Storage Area Sign EMP-03-06 Temporary Non-Hazardous Waste Storage Area Sign EMP-03-07 Instructions for Delivery and Transport of Hazardous Material EMP-04 Environmental Life Cycle EMP-05 Energy Management System Procedure EMP-05-01 Energy Management Process