

Eksim Energy-Viransehir SPP Project

Stakeholder Engagement Plan

May 2024

This page left intentionally blank for pagination.

Mott MacDonald Mesa Koz Sahrayıcedit District Atatürk Street No. 69 / 255 34734 Kadıköy Istanbul Turkey

T +90 (0) 216 766 3118 mottmac.com

Eksim Energy-Viransehir SPP Project

Stakeholder Engagement Plan

May 2024

Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
А	19/03/2024	Ece Alper	Cevdet Kabal	Mustafa Islek	Draft Stakeholder Engagement Plan for Lender's Review
0	13/05/2024	Ece Alper	Cevdet Kabal	Mustafa Islek	Final Stakeholder Engagement Plan for Lender's Review

Document reference: 221100016 | SEP | 0 |

Information class: Standard

This document is issued for the party which commissioned it and for specific purposes connected with the abovecaptioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

Contents

1	Intro	duction a	and Project Summary	1
	1.1	Overviev	N	1
	1.2	Objective	es and Scope of the Stakeholder Engagement Plan	3
	1.3	Project L	ocation and Social Area of Influence	3
2	Stak	eholder E	Engagement Requirements	5
	2.1	Overviev	N	5
	2.2	Applicab	le Guidelines and Standards	5
		2.2.1	National Requirements	5
		2.2.2	International Requirements	7
		2.2.3	Applicable Policies and Management Systems of the Project Company	7
3	Stak	eholder I	dentification and Analysis	8
	3.1	Overviev	N	8
	3.2	Project S	Stakeholders	8
4	ESN	IS Consu	Iltation Activities and Outcomes	11
	4.1	Overviev	N	11
	4.2	Previous	sly Carried out E&S (Environmental and Social) Activities	11
	4.3	Stakehol	Ider Engagement Activities During ESAP Implementations	13
5	Stak	eholder E	Engagement Programme and Disclosure Process	14
	5.1	Overviev	N	14
	5.2	Stakehol	Ider Engagement and Consultation Program	14
6	Proj	ect Grieva	ance Mechanism	19
	6.1	Overviev	N	19
	6.2	Principle	es of the Grievance Mechanism	19
	6.3	-	Grievance Mechanism	20
	6.4	Internal (Grievance Mechanism	21
	6.5	Grievand	ce Mechanism Channels and CLO Contact Details	21
7	Res	ources ar	nd Responsibilities	23
8	Mon	itoring ar	nd Reporting	25
A.	Ann	ex		26

20

A.1	Sample Project Consultation Log	27
A.2	Revised Project Grievance Register Form (Turkish and English)	28
A.3	Sample Project Grievance Log	29
A.4	Internal Grievance Register Forms	30

Tables

Table 1.1: Affected Settlements in the Project's Social Area of Influence (Ao tanımlanmamış.	I) Hata! Yer işareti
Table 3.1: External Stakeholder List for Governmental Authorities	8
Table 3.2: External Stakeholder List for Non-Governmental Bodies	10
Table 3.3: Other External Stakeholder Groups	10
Table 3.4: Internal Stakeholder List	10
Table 4.1: Summary of Previous Stakeholder Interviews Hata! Yer işar	eti tanımlanmamış.
Table 4.2: Summary of Stakeholder Interviews Conducted During the ESAP	
Implementations Hata! Yer işar	eti tanımlanmamış.
Table 5.1: Stakeholder Engagement and Consultation Program Throughout	the Lifetime of
the Project	15

Figures

Figure 6.1: Steps of the External Grievance Mechanism Process

1 Introduction and Project Summary

1.1 Overview

The attributes and essential components of YEKA (Renewable Energy Resource Areas), which are designated specifically for renewable energy projects, are regulated by legislation. The objective of identifying these areas to investors is to expedite the realization of investments and ensure the effective and efficient utilization of large-scale renewable energy resource areas (YEKA) on public, treasury, and privately owned immovables.

YEKA-2, 4 and 10 competitions were held on 28.06.2022 within the scope of the "Competition Announcement for the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy" published in the Official Gazette dated 29.04.2022 and numbered 31824. Within this scope Eksim Enerji (Project Company) has won the competition.

With a total installed capacity of approximately 187.5 MWm/150 Mwe, the Project Company intends to develop and operate the Viranşehir YEKA Solar Power Plant. Annual electricity production of 300 GWh will result from the Project's conclusion.

The energy transmission line construction works will be sub-contracted out to another company once an agreement is reached with Turkish Electricity Transmission Joint Stock Company (TEIAS).

Around 270 hectares comprise the Project Area. Egesa Enerji, Reşitoğlu Enerji Elektrik Üretim Aş.., Ral Enerji, and Kalyon Enerji are the proprietors of additional solar energy plant license sites that are adjacent to the Project Area. Supporting and tracking structures, mounting and AC current inverters, cabling, transformers, a Supervisory Control and Data Acquisition (SCADA) system, 347,224 photovoltaic (PV) panel modules, one substation (400kV Viranşehir Havza substation), energy transmission lines that will link the generated electricity to the national grid, and cabling are all components of the project (Figure 1.1).

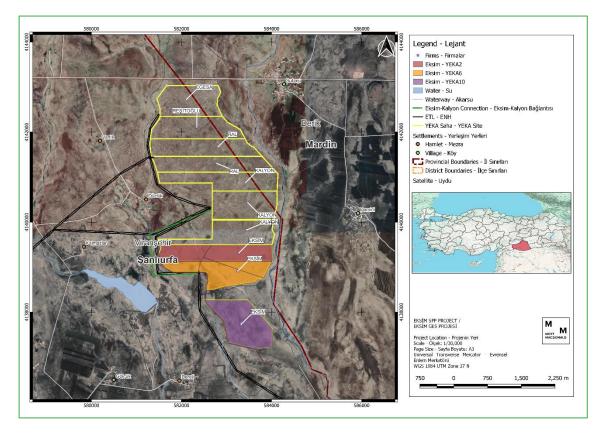


Figure 1.1: Project Location

Five companies investing in the project area have formed a joint venture (JV) named KERER. The primary goal of this JV is to address the needs of residents living near the YEKA investment zone in a unified manner that benefits all settlements. Additionally, project managers from the participating companies convene weekly meetings to discuss the specifics of their consultation efforts.

Project is composed of three different Lots; namely, YEKA-2, YEKA-6 and YEKA-10. These areas covers approximately, 97 hectares, 90 hectares and 100 hectares respectively. Each Lot will have 50 MWe capacity.

No construction activity has been started yet. In addition, no fences were built, and no mobilization area was in place.

The project area was defined as YEKA. There are three EIA positive decisions (for Viranşehir-10 SPP, Viranşehir-2 SPP and Viranşehir-6 SPP) secured for the Project. The Environmental Impact Assessment (EIA) study for three part of the Viranşehir YEKA SPP was performed in 2022 and an EIA Positive Decision was issued by the Ministry of Environment, Urbanization and Climate Change on 10 May 2023.

The institutions consulted within the scope of EIA were Viranşehir Municipality, General Directorate of ŞUSKİ, Şanlıurfa Metropolitan Municipality, General Directorate of Energy Affairs, Directorate General for State Hydraulic Works, General Directorate of Nature Conservation and National Parks, Şanlıurfa Governorship, Ministry of Culture and Tourism, Ministry of Energy and Natural Resources, Disaster and Emergency Directorate.

The stakeholder engagement meeting was held on 16 November 2022 in Gölcük neighbourhood of Viranşehir district.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

Within the scope of the ESMS, the SEP covering the construction and operation phases is prepared by Mott MacDonald. The objective of this SEP is to present a strategic guideline for future stakeholder engagement and consultation activities that will be implemented throughout the Project lifecycle in a comprehensive and culturally appropriate way. The SEP will follow a gender-sensitive approach during all implementation phases. SEP ensures that communication tools and information sharing mechanism are accessible to the vulnerable groups identified within the scope of the Project.

The SEP defines the stakeholder engagement activities to be organized, grievance mechanism to be applied, and the Project personnel responsible for the overall SEP implementation. During the definition of these components, the SEP, which has been prepared within the ESDD process, was prepared.

The Project Company is committed to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1. This SEP will be revised on annual basis.

1.3 Project Location and Social Area of Influence

The construction site of the project is situated in the Golcük and Kadıkoy localities of the Viranşehir district, which is located in the Şanlıurfa province of southeastern Anatolia, Turkey. Şanlıurfa city center is situated at an approximate distance of 103 kilometers, while Viranşehir is reached in 23 kilometers. The road that runs along the western boundary of the Project site from Viranşehir to Diyarbakır provides access to the Project Area. Furthermore, it is intended to utilize the roads leading to the localities.

Social AoI includes four hamlets which are part of Golcük Village. Given that the majority of the immediate vicinity, including the Project Area, consists of pastureland, these localities are the site of intensive livestock work. Furthermore, the southern region of the Project Area is home to agricultural activities. With locations, Table 1.1 provides the names and distances of these communities.

No.	Name	Status	Distance to Project site (m)
1	Gölcük	Village	2600
2	Dereli	Hamlet	1400
3	Kalmazlar	Hamlet	1400
4	Düzlük	Hamlet	1100

Table 1.1:	Nearest Settlem	ents to the P	roject site
------------	------------------------	---------------	-------------

Source: Google Earth Images

An analysis has been made to assess the social receptors of the Project during the construction and also will be done in operation phases separately. Accordingly, the direct social receptors of the Project phases are as follows:

- Local community members whose livelihoods have the potential to be significantly and adversely affected due to land acquisition and/or expropriation,
- Nearby neighbourhoods / villages located in the immediate vicinity of the Project area that are likely to be exposed to increased traffic volume, road safety risks, dust and noise impacts,
- Local community members who are on the access roads to the Project area and/or use these roads, and are likely to be exposed to increased traffic volume and road safety risks,

- Local community members who may benefit from the Project's local employment opportunities,
- Business enterprises that may benefit from the Project's local procurement activities,
- Vulnerable groups who may be in need for essential consultation in the Project, and
- All construction phase workers employed within the scope of the Project (including subcontractors).

The positive social impacts of the Project will be on local employment creation and local economic contributions through procurement of goods and services specifically during the construction phase. In addition to these, the Project will also improve local infrastructural capacity such as improving the roads around the Project area.

The major adverse impacts of the Project during the construction phase are assessed as people having livestock activities on the land where the Project is planned to be located and people subject to economic displacement due to loss of their agricultural land at the southern site of the Project Area.

Operation phase adverse impacts that are assessed within the ESMS study are related to noise, air and soil-based impacts.

2 Stakeholder Engagement Requirements

2.1 Overview

Continuous, open and transparent stakeholder engagement is an essential aspect in projects to ensure the Project's sustainability, improved quality and better implementation. The objective of the stakeholder engagement is successfully managing the risks and impacts on communities, people, groups, businesses and any other interested parties affected by projects. Robust stakeholder identification and stakeholder mapping are the very first and significant steps of an effective stakeholder engagement.

Stakeholder engagement provides a mutual communication line between the Project Company and the Project stakeholders, which will continue throughout the Project lifecycle including construction and operation phases. Different phases of the Project can necessitate varying engagement and consultation activities. The Project Company is responsible for establishing a platform that enables continuous communication and consultation with all Project stakeholders.

As the international standards and requirements (particularly IFC PS1) necessitate, stakeholder consultation and engagement involve the following aspects:

- Identification and analysis of all potentially affected individuals, groups, communities, organizations, vulnerable/disadvantaged individuals and groups that will be considered as stakeholders,
- Planning the steps for the way stakeholder engagement, information disclosure and meaningful consultation with stakeholders will be held,
- Identification of the issues that remain as a risk or adverse impact for the Project or the stakeholders,
- Formation of a good understanding of the Project for stakeholders,
- Addressing a grievance mechanism, which is free of manipulation, coercion and intimidation for long-term communication between the Project and the stakeholders,
- Responding to grievances in a timely manner through the grievance mechanism, and
- Regularly informing the stakeholders about the Project.

To ensure that stakeholder engagement processes are successful and effective, stakeholder engagement should be initiated earlier in the projects. In line with the IFC PS1, stakeholder engagement has started during the National EIA process of the Project through engagement with the key project stakeholders. Stakeholder engagement will continue throughout the Project lifecycle.

2.2 Applicable Guidelines and Standards

This SEP has been prepared in compliance with the national legislation and international standards and requirements (particularly IFC PS1) which are explained in detail in the following sections.

2.2.1 National Requirements

The Turkish EIA Regulation (OG Date/Number: 29.07.2022/31907) includes a number of requirements regarding information disclosure and stakeholder participation.

During the scoping phase of the projects, stakeholder engagement within the scope of the National EIA process starts with the establishment of a commission that involves

representatives from related governmental bodies and that is responsible for review and assessment of the project.

Establishment of the commission is followed by the public participation meeting. Organizing a public participation meeting is legally obligatory as per the regulation. The aim of the public participation meeting is to ensure that the public and interested parties in the project (i.e., local community members, governmental bodies, non-governmental organizations) are informed about the project and have an opportunity to raise their opinions, suggestions and/or concerns regarding the project. It is crucial that the local community members who are assessed to be most affected by the project are enabled to participate in this meeting. Therefore, organizing the meeting that is accessible to the local community members to the most possible extent is also underlined within the regulation.

The issues reported by the participants of the meeting are documented in the official meeting minutes to be considered and addressed in the EIA document. In addition, the institutions authorized by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) prepare a SEP in order to inform the public about the project and its impacts, and to facilitate receiving the opinions and suggestions of the public regarding the project. The SEP is submitted in the annex of the EIA document.

Once the EIA document is submitted to the MoEUCC for review, the MoEUCC and the related provincial directorates announce to the public that the review process of the established commission has started, and the draft EIA document is also open to public review and comments for 30 days. Appropriate communication channels (i.e., newspapers, noticeboards, and the Internet) are used for the announcement.

Following the review of the commission and the public, the final draft of the EIA document is disclosed by the MoEUCC and the related provincial directorates for 10 days through announcement boards and the Internet. By considering the evaluations of the committee and public views, the MoEUCC gives the "EIA Positive" or "EIA Negative" decision regarding the project.

At the final stage, the decision of the MoEUCC is also disclosed to the Project stakeholders by using appropriate means of communication.

National legislation related to consultation, information disclosure, stakeholder engagement and grievance mechanism also includes Law on Right to Information (No. 4982), Law on Preservation of Personal Data (No. 6698), Law on Use of the Right to Petition (No. 3071), and Regulation on the Principles and Procedures for the Enforcement of the Law on the Right to Information, which are described below:

Law on the Right to Information (No. 4982)

Law on the Right to Information regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

Law on Preservation of Personal Data (No. 6698)

The purpose of this Law is to protect the fundamental rights and freedoms of individuals, especially the privacy of private life, in the processing of personal data and to regulate the obligations of real and legal persons processing personal data and the procedures and principles to be followed.

The Law on Use of the Right to Petition (No. 3071)

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance

with the Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). Foreigners residing in Türkiye are also entitled to enjoy this right on the condition of reciprocity and using Turkish language in their petitions.

2.2.2 International Requirements

The stakeholder engagement and consultation requirements of the Project are assessed and planned by considering the following international standards:

- IFC's Performance Standards on Environmental and Social Sustainability (2012)
 - Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts: PS 1 emphasizes on the importance of: (i) an integrated assessment to identify the environmental and social impacts, risks and opportunities of the Project; (ii) effective community and stakeholder engagement through disclosure of Project-related information and consultation with local communities on matters that directly affect them; and (iii) the Client's management of social and environmental performance throughout the life of the Project through management programs, monitoring, and review.
 - Performance Standard 5 Land Acquisition and Involuntary Resettlement: Decisionmaking processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the Performance Standard.

2.2.3 Applicable Policies and Management Systems of the Project Company

According to the content of the SEP previously prepared, the Project Company has defined the stakeholders, disclosure approach, commitment to meaningful consultation and participation, ongoing reporting to external stakeholders, and grievance management of the Project Company.

The Project Company has also an integrated Quality, Health and Safety, Environment and Energy Management Systems and relevant certifications, which are listed below:

- ISO 9001: 2015 Quality Management System
- ISO 14001: 2015 Environmental Management System
- ISO 45001: 2018 Occupational Health and Safety Management

In addition, the Project Company has the following policies and assessments:

- Traffic Management Plan
- Community Health and Safety Management Plan
- Human Resources Policy
- Contractor Management Plan
- Health and Safety Management Plan
- Internal and External Grievance Mechanism
- Livelihood Restoration Plan
- Training Plan
- Worker Accommodation Plan
- Construction Camp Management Plan
- Security Management Plan
- Gender Equality Action Plan

3 Stakeholder Identification and Analysis

3.1 Overview

In line with the definitions of international standards, stakeholders are defined as the individuals or groups who are impacted by a project or possess an interest in its outcome. Project's impact may be positive or negative and can be direct or indirect.

The first step of the stakeholder engagement is to identify the Project stakeholders. The aim of this identification is to determine each stakeholder group and define their relation to the Project. It is important to consider their opinions, perspectives, concerns and needs when undertaking a project to ensure successful outcomes.

3.2 Project Stakeholders

Identified stakeholders of the Project are categorized as external stakeholders (including governmental and non-governmental bodies, mukhtars/residents/local communities, vulnerable/ disadvantaged groups, media and universities) and internal stakeholders (all Project staff, including contractors and subcontractors and their employees) which are given in Table 3.1 through Table 3.4Table 3.3**Hata! Başvuru kaynağı bulunamadı.** below. All stakeholders are categorized and colour-coded as high (red), medium (yellow) or low (green) depending on magnitude of the stakeholders' being affected by and/or affect the Project as well as their level of interest to the Project. In line with each stakeholder's level of interest, disclosure and consultation activities are determined based on certain frequencies for construction and operation phases of the Project. Disclosure and consultation activities to be implemented throughout the lifetime of the Project is outlined in Table 5.1 together with the proposed implementation timetable.

Level	Organization	Relation to the Project	Level of Interest
	Ministry of Agriculture and Forestry (MoAF) MoAF, General Directorate of Animal Husbandry MoAF, General Directorate of Nature Conservation and National Parks MoAF, General Directorate of State Hydraulic Works	MoAF may have specific views about the design, construction and operation activities of the Project.	Medium
National	Ministry of Environment, Urbanization and Climate Change (MoEUCC) MoEUCC, General Directorate of EIA, Permit and Audit MoEUCC, General Directorate of Environmental Management MoEUCC, General Directorate of Infrastructure and Urban Transformation MoEUCC, General Directorate of Spatial Planning	MoEUCC has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.	Medium

Table 3.1: External Stakeholder List for Governmental Authorities

Governmental bodies

	MoEUCC, General		
	Directorate of Protection of Natural Assets		
	Ministry of Transport and Infrastructure (MoTI)		
	MoTI General Directorate of Infrastructure Investments	- MoTI may have specific views regarding evaluation of the Project.	Medium
	MoTI General Directorate of Highways		
	Ministry of Labour and Social Security (MoLSS)		
	MoLSS, General Directorate of Labor	 MoLSS may have specific views on labour and working conditions, and health and safety of the Project 	Medium
	MoLSS, General Directorate of Occupational Health and Safety	personnel.	
	Ministry of Culture and Tourism (MoCT)		
	MoCT General Directorate of Cultural Heritage and Museums	MoCT may have views in terms of legislation.	Low
	15 th Regional Directorate of DSI (State Hydraulic Works)	This organization may have specific views about water courses running close to the Project area.	Medium
Regional	3 rd Regional Directorate of Ministry of Agriculture and Forestry	f This organization may have specific views on forest and agricultural lands near the Project area. The organization may provide opinion regarding road crossing within the Project area. The governorship representing the national government is the highest authorities in the provinces.	Low
	9 th Regional Directorate of General Directorate of Highways		Low
	The Governorship of Şanlıurfa	he Governorship of Şanlıurfa The governorship representing the national government is the highest authorities in the provinces.	
	Şanlıurfa Investment Monitoring and Coordination Committee Directorate	This organization coordinates all kinds of investment and construction works to be carried out by ministries and other central government organizations in the provinces.	High
	Şanlıurfa Municipality		
	Şanlıurfa Municipality, Directorate of Water and Sewerage		
	Şanlıurfa Municipality, Directorate of Zoning and City Planning	The municipality and its relevant departments will have responsibilities - in relation to the Project.	High
	Şanlıurfa Municipality, Directorate of Cemeteries		
Provincial	Şanlıurfa Municipality, Directorate of Technical Works		
	Şanlıurfa Governorship Provincial Directorate of Social Security Institution	This organization may provide specific views on labour and working conditions, and health and safety of facility personnel.	Medium
	Şanlıurfa Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)	PDoEUCCs of the provinces have regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting.	High
	Şanlıurfa Provincial Directorate of Civil Society Relations	This institution contributes to the rooting of participatory democracy and improving the quality of life of the society by supporting social organization.	High
	Şanlıurfa Regional Directorate of Culture and Tourism	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project area.	Low

Şanlıurfa Provincial Directorate of Agriculture and Forestry	This organization may provide provincial-specific and/or site-specific views on the Project.	High
Şanlıurfa Provincial Command of Gendarmerie	This organization may provide provincial-specific and/or site-specific views on the Project.	Medium
Local Governorship of Viranşehir, The Municipality of Şanlıurfa Viranşehir District Directorate of Agriculture and Forestry	The Project area is located in Viranşehir district and the local governorship, the central municipality and their related departments are	High
Viranşehir District Gendarmerie Command	 stakeholders regarding obtaining relevant permits, approvals during planning, construction and operation phases of the Project. 	Medium

Table 3.2: External Stakeholder List for Non-Governmental Bodies

Non-governmental bodies

Level	Organization	Relation to the Project	Level of Interest	
	Türkiye Foundation for Combating Erosion, Afforestation and Protection of Natural Assets (TEMA)			
	Environmental Protection and Research Foundation (ÇEV-KOR)	These foundations, associations,		
Provincial and	Turkish Environmental Protection Foundation (TUÇEV)	and chambers may provide their	Llink	
District	Foundation for the Protection and Promotion of	specific views related to the	High	
	Environmental and Cultural Values (ÇEKÜL)	Project		
	World Wide Fund for Nature (WWF) Türkiye			
	Association for Sustainable Economics and Finance	_		
	Research (SEFiA)			

Table 3.3: Other External Stakeholder Groups

Stakeholder groups

Level	Group	Relation to the Project	Level of Interest	
Mukhtars/Residents/Local Communities	The mukhtars and residents in Project affected Gölcük neighbourhood and its hamlets	Gölcük neighbourhood is a key stakeholder considering potential	High	
	Local Businesses and Enterprises	Gölcük neighbourhood is a key stakeholder considering potential impacts of the Project. Vulnerable groups are key stakeholders considering potential impacts of the Project. It is important to engage with local and regional media organizations for effective public disclosure and consultation. Universities are one of the key		
	Women			
Vulnerable/ Disadvantaged	The elderly	Vulnerable groups are key	High	
Groups	Students	ts in Project thood and its erprises Gölcük neighbourhood is a key stakeholder considering potential impacts of the Project. Vulnerable groups are key stakeholders considering potential impacts of the Project. It is important to engage with local and regional media organizations for effective public disclosure and consultation. Universities are one of the key stakeholders when research needs		
•	Unemployed people	- impacts of the Project.		
	Refugees under international protection (UIP)	n (UIP)		
Media	Local, regional, and social media (including newspapers, TV stations, social media channels)	and regional media organizations for effective public disclosure and	Medium	
Universities	Şanlıurfa Harran University	stakeholders when research needs to be conducted within the scope	Medium	

Table 3.4: Internal Stakeholder List

Internal stakeholders

Level	Organization	Relation to the Project	Level of Interest
Internal Stakeholders	Project staff	These groups are one of the key stakeholders in terms of continuation of the Project activities in compliance with the international standards.	High

4 ESMS Consultation Activities and Outcomes

4.1 Overview

International standards emphasize that stakeholder engagement and consultation is one of the key components of the ESMS process to reach and inform as many stakeholders as possible, especially those in the Project area of influence through the stakeholder engagement activities.

In this regard, the objectives of the Project's stakeholder engagement and consultation process include ensuring that identified stakeholders are appropriately informed and consulted on issues that could potentially affect them and maintaining a constructive relationship with stakeholders on an ongoing basis throughout the lifecycle of the Project.

4.2 Previously Carried out E&S (Environmental and Social) Activities

As of 2024, stakeholders who are affected and interested in the Project, both during the EIA period and during the Land Acquisition process, have been identified and consultations with stakeholders have started. Public authorities, mukhtars, landowners/users and other stakeholders affected by the project were consulted for different purposes.

Correspondence / Opinion Letters

During the National EIA process, the Project Company conducted consultation activities with the governmental bodies to receive opinions on the Project through correspondence. These consulted governmental bodies are listed below:

- Ministry of Environment, Urbanization and Climate Change,
 - General Directorate of Environmental Impact Assessment, Permit and Inspection
 - Şanlıurfa Provincial Directorate of Environment and Urbanisation
- Ministry of Energy and Natural Resources,
 - Energy Market Regulatory Authority
- Ministry of Culture and Tourism
- Şanlıurfa Metropolitan Municipality
 - General Directorate of ŞUSKİ
- Ministry of Forestry and Agriculture
 - Provincial Directorate of Forestry and Agriculture
 - Directorate General for State Hydraulic Works
 - General Directorate of Nature Conservation and National Parks,
- Şanlıurfa Provincial Disaster and Emergency Directorate
- Şanlıurfa Governate
 - Investment Monitoring Coordination Directorate

On the basis of the received opinion letters, none of the consulted authorities reported a concern related to the Project. Nevertheless, it has been stated that the following measures should be taken in terms of Provincial Directorate of Forestry and Agriculture's legislation regarding the project in question:

- Obtaining non-agricultural use permits from the Ministry of Agriculture and Livestock, as the area is within the scope of Law No. 5403.
- Compliance with the provisions of the Amended Olive Cultivation Improvement and Vaccination of Wild Animals numbered 3573 and the additional Olive Cultivation Law numbered 4086.
- Obtaining the necessary permits for the areas within the framework of the Pasture Law No. 4342.
- In accordance with the Fisheries Law No. 1380, without damaging the river beds at the points where the streams and streams that can enter the project area are cut, and to protect the artistic structures at these points.
- Compliance with the criteria and provisions specified in the Industrial Air Pollution Regulation.
- Registration if there are non-registered areas within the borders of the request area.

In addition, according to the opinion letter of General Directorate of Nature Conservation and National Parks, following actions will be in place:

- Committing that the measures stated in the EIA Report to be taken to eliminate and minimize possible negative impacts will be implemented by the activity owner,
- Commitment that the necessary measures will be taken immediately by the owner of the activity in case of a new negative impact that may be detected during the operation period,
- During the surface stripping and preparation stages, shrubs, trees, etc. are removed by a fauna expert. Areas where nests are likely to be found should be checked to see if there are cubs. If there are cubs, that area should be marked and no intervention should be made until the cub leaves the nest.
- Considering the hibernation period of the species using the area, surface scraping operations should not be carried out during this period,
- Avoid harming wild animals and water resources,
- Providing training to the personnel who will work during the construction and operation phases, ensuring that they show the necessary sensitivity towards wildlife,

The official correspondences conducted within the scope of environmental and social studies were provided in the final National EIA Report which was shared with the Consultant.

Within the scope of the National EIA studies, social impact assessment studies were conducted as well. On 16 November 2022, a public participation meeting was carried out in Gölcük Village, Viranşehir district, Şanlıurfa province within the scope of the National EIA Studies. The meeting aimed to engage with the stakeholders, provide information about the Project to them, and gather their feedback regarding the Project. The participants from the following institutions attended the meeting together with the Project Company representatives as well as Project affected local community members:

- Şanlıurfa Governorship, Provincial Directorate of Environment and Urbanisation,
- Local People living in the Gölcük Village and its hamlets.

The minutes of the public participation meeting are provided in the National EIA Reports. Main concerns raised by the participants were related to the loss of pastureland areas being used by the local people and loss of agricultural lands.

4.3 Stakeholder Engagement Activities During ESAP Implementations

Mott MacDonald Social Team conducted two site visits on 18-19 January 2024 within the scope of the ESDD Studies of the Project. The aim of the site visits included collecting baseline data about the Project affected neighbourhoods/villages, understanding the Project-related concerns and expectations of the local community members, reflecting the views of key stakeholders, and identifying vulnerable groups. In line with these aims, mukhtars and local residents were consulted during the site visit in order to identify local community members and other Project stakeholders, understand their perceptions about the Project, address any concerns they may have about the Project, and identify the Project impacts. The external stakeholders interviewed during the field studies are listed below:

- Mukhtar and member of the mukhtar office (Aza) / residents of Gölcük neighbourhood
- Residents of the Gölcük Village and Dereli Hamlet.

The main findings of these consultations are summarized below:

- Residents were informed about the Project last year by the Company Last year. They gained detailed insights through an information meeting held in Gölcük in 2023.
- The Dereli community consists of roughly 20 families, totalling about 150 individuals, predominantly youth, with nearly 40 children and adolescents eligible for education. The community has an elementary school, but older students travel to neighbouring districts and neighbourhoods for their secondary and higher education.
- Although lacking a sewage system, the local government regularly removes domestic waste from designated pits. The inhabitants depend on well water for consumption and have access to electricity.
- The community primarily engages in livestock farming and grows crops like rice, barley, and wheat.
- Home to about 7,000 cattle and sheep, the community spans an estimated 500 hectares of farmland. Grazing takes place from March to September.
- The PAPs are worried about the division of grazing lands and suggest establishing a passageway to link these zones.
- The area known as 'Eksim 10' within the project's boundaries is utilized by the locals for rice farming. Despite being state-owned land, it has been farmed by the Dereli people for generations. They are seeking another parcel of land to make up for the one they will lose. Residents have removed stones from available 70 hectares of land, but finding a large enough area is still problematic. The community members hope that the company's assistance to remove remaining rocks on the land will address their concerns regarding the project.
- The women living in Dereli Hamlet were also interviewed and understood that they were informed about the Project. They were asked for suggestions and recommendations that would be beneficial for them however no additional requests were declared apart from provided above.

5 Stakeholder Engagement Programme and Disclosure Process

5.1 Overview

Stakeholder engagement is an ongoing component of the Project that needs to continue throughout the construction and operation phases. On the basis of the documents shared by the Project Company, it is seen that the stakeholder engagement activities conducted so far during the construction phase have followed a local community member-centred and structured framework in line with the international requirements. The same approach will continue to be applied on site throughout the Project lifecycle.

The stakeholder engagement programme given in this section of the SEP summarizes key planned stakeholder engagement and consultation activities during the construction and operation phases. The programme will be reviewed regularly during both construction and operation in order to ensure that it remains valid and meets the needs of the Project.

The Project will follow a gender-sensitive approach, which is also reflected to the SEP and its content on the consultation activities. Gender aspect will be considered in the implementation of the SEP through a gender inclusive and participatory point of view.

5.2 Stakeholder Engagement and Consultation Program

The proposed implementation timetable and responsibilities for stakeholder engagement throughout the lifetime of the Project is outlined in Table 5.1 below.

Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible		
Communities						
Residents in the Project Affected Gölcük neighbourhood and its hamlets ¹	 Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of gender-based violence 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, DID /brochure and other Project 	 At least monthly (and when 			
People who have been affected by past activities and will be affected in the future	 Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, 	 PID/brochure and other Project related documents Website announcements Social media announcements Announcements through posters/ billboards/ press release 	needed) during constructionQuarterly during operation	CLOProject Company		
Local Businesses and Enterprises	······································					
Mukhtar of the Project Affected Gölcük neighbourhood	 Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (traffic 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Website announcements Social media announcements Announcements through 	 At least monthly (and when needed) during construction Quarterly during operation 	CLOProject Company		
	Communities Residents in the Project Affected Gölcük neighbourhood and its hamlets ¹ People who have been affected by past activities and will be affected in the future Local Businesses and Enterprises Mukhtar of the Project Affected	Communities Residents in the Project Affected Gölcük neighbourhood and its hamlets ¹ Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of gender-based violence and harassment (GBVH) Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) Local Businesses and Enterprises Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of GBVH Mukhtar of the Project Affected Gölcük neighbourhood Mukhtar of the Project Affected Inform about the local employment and procurement Inform about the local employment and procurement Inform about the local employment and procurement	Communities Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project, provisions to prevent the risks of gender-based violence and harassment (GBVH) Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) Provide information about the Project's development stages, potential impacts, community health and safety risks (blasting, transportation of heavy equipment, etc.) Exce-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Social media announcements Social media announcements Announcements through posters/ billboards/ press release Mukhtar of the Project Affected Golcük neighbourhood Provide information about the Project, provisions to prevent the risks of GBVH Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (traffic Disclosure of SEP, PID/brochure and other Project related documents Social media announcements Socia	Communities Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grevance mechanism of the Project, provisions to prevent the risks of gender-based violence and harassment (GBVH) • Face-to-face consultation meetings • At least monthly (and when needed) during construction People who have been affected by past activities and will be affected in the future • Outline the actions identified in the ESAP • At least monthly (and when needed) during construction Inform about the local employment and procurement • Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) • Social media announcements • At least monthly (and when needed) during construction Local Businesses and Enterprises • Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grevance mechanism of the Project's development stages, potential impacts, communication channels with stakeholders, and grevance mechanism of the Project's development stages, potential impacts, communication channels with stakeholders, and grevance mechanism of the Project activities involving construction the rest of GeVH • At least monthly (and when needed) during construction Mukhtar of the Project Affected Goldki neighbourhood • Provide information about the Project activities involving construction the project activities involving construction the project activities involving construction channels with stakeholders, and grevance mechanism of the Project activities involving construction anouncements • At least monthly (an		

Table 5.1: Stakeholder Engagement and Consultation Program Throughout the Lifetime of the Project

¹ Please note that a dedicated LRP will be in place including all impacted people from parcellation and zoning plan.

No	Stakeholders	Issues to be consulted/discussed	Communication methods	Phase and frequency	Responsible	
3	Vulnerable Groups (Women, the landless/homeless people, the elderly, students, people with disabilities, unemployed people, SuTP, refugees UIP)	 Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, informing about grievance mechanism of the Project, provisions to prevent the risks of GBVH Specific interest to receive their grievances (if there are any) since they may not be able to use the grievance channels Outline the actions identified in the ESAP Inform about the local employment and procurement Inform about the Project activities involving community health and safety risks (blasting, transportation of heavy equipment, etc.) 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Website announcements Social media announcements Announcements through posters/ billboards/ press release Specific meetings held with women groups and other particular vulnerable groups 	 Bi-monthly during construction Semi-annually during operation 	CLOProject Company	
Gove	rnmental Bodies					
4	Governmental bodies and stakeholders at national level	 Conduct consultation on Project stages Provide information on potential impacts of the Project as well as on the grievance mechanism of the Project 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Correspondence 	 Annually during construction When needed during operation 	CLOProject Company	
5	Governmental bodies and stakeholders at provincial and district level	 Conduct meetings and correspondence for Project permits, consultation on the Project stages Provide information on environmental and social impacts of the Project, actions defined in the ESAP, Project grievance mechanism 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Correspondence 	 Quarterly during construction Annually during operation 	CLOProject Company	

No	Stakeholders	keholders Issues to be consulted/discussed		Phase and frequency	Responsible		
6	District Municipality	 Conduct meetings and correspondence for Project permits, consultation on the Project stages Provide information on environmental and social impacts of the Project, actions defined in the ESAP, Project grievance mechanism Organize meetings for grievances reported to the municipal units and receiving opinions and recommendations 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Correspondence 	 Quarterly during construction Annually during operation 	CLOProject Company		
Unive	ersities						
7	Universities	 Conduct consultation on Project stages Organize meetings about the research needs to be conducted within the scope of the Project. Provide information possible impacts of the Project, information on the grievance mechanism of the Project 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Website announcements Correspondence 	 When needed during construction and operation 	CLOProject Company		
NGOs	5						
8	NGOs	 Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the actions identified in the ESAP 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Website announcements Social media announcements Announcements through posters/ billboards/ press release 	 When needed during construction and operation 	CLOProject Company		

No	Stakeholders	Stakeholders Issues to be consulted/discussed		Phase and frequency	Responsible	
9	Media	 Provide information about the Project's development stages, potential impacts, communication channels with stakeholders, and grievance mechanism of the Project Outline the actions identified in the ESAP Engage with local and regional media organizations for effective public disclosure and consultation 	 Face-to-face consultation meetings Regular visits Disclosure of SEP, PID/brochure and other Project related documents Website announcements Social media announcements Announcements through posters/ billboards/ press release 	 When needed during construction and operation 	CLOProject Company	
Intern	al Stakeholders					
	Project Staff	 Provide information about the Project updates and changes in operations with regard to labour 	 Trainings Face-to-face consultation meetings Disclosure of SEP, PID/brochure and other Project 	 Monthly during construction 	 Project Company and relevant 	
10	Contractors and subcontractors and their employees	 rights, information on contracts, code of conduct, including provisions for GBVH Disclose the grievance mechanism of the Project 	 Announcements through posters/ billboards/ press release Announcements on the Project area 	 When needed during operation 	departments (i.e., Human Resources Department)	

6 **Project Grievance Mechanism**

6.1 Overview

The Project Company is required to establish an effective and accessible grievance mechanism as a part of the stakeholder engagement, information disclosure and consultation. The aim of the grievance mechanism is to provide channels that are free of manipulation, coercion and intimidation in which Local community members can report their requests, concerns and grievances regarding the Project and its impacts. Responding to grievances and resolving them in a timely, proactively, unbiased, effective, and efficient manner is essential according to the international standards and requirements on stakeholder engagement. Specifically, it provides a transparent and credible process for fair and sustainable outcomes. By this way, trust and cooperation could be mutually developed among the Project stakeholders and the Project Company through corrective actions. Main components of a successful grievance mechanism also include anonymity, confidentiality, and transparency principles.

Within the scope of the SEP Preparation studies and Internal and External Grievance mechanism has been prepared as well for the Project stakeholders. There is a grievance register form used for registration of the grievance. The part in the grievance register form that requires information about the applicant shall be left blank in the cases where the applicant would like to raise grievance anonymously. The grievance register form is revised in accordance with these principles. Sample of the revised grievance register form is presented in Annex Section A.2.

The rights of the complainant are not limited to appealing the outcome of the grievance process, but also include the following:

- The complainant is not obliged to participate in the grievance and feedback mechanism and may choose to resort to other judicial, administrative, or legal remedies. Judicial or administrative remedies shall be applied in accordance with the Constitution of the Republic of Türkiye and relevant legislation.
- The complainant cannot be forced to participate in the grievance management process.
- The complainant may, at any time, discontinue his/her participation in the project grievance mechanism and may choose to apply for other legal remedies.

Grievances are categorized as external and internal depending on the type of the stakeholder. Since they have different grievance channels and resolution processes, they are defined in Sections 0 and 0 separately.

6.2 **Principles of the Grievance Mechanism**

To ensure compliance with the international standards (particularly IFC PS1 and good international practices), there are a number of principles that the Project Company will apply to the Project's grievance mechanism in general. These principles can be summarized as follows:

• There will be a formalized and written Project Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels with contact details of the CLO, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample subjects that describes the type of grievance as per the identified Project impacts (i.e., noise, air, visual, dust, GBVH, labour management, and traffic), and management and resolution process together with the assigned responsible Project staff.

- Grievance mechanism will be committed to confidentiality and anonymity. Grievance channels both online and offline will be enabled to receive anonymous applications.
- It is crucial to provide appropriate environment where all internal and external stakeholders can easily report any GBVH-related grievance in a safe and confidential way when they need. GBVH cases will be registered and processed as a part of the current grievance mechanism. However, they will be approached in a more sensitive way and in an immediate time manner through ensuring confidentiality, non-retaliation, protection and supervision of victims, and utilize legal expertise when needed.

6.3 External Grievance Mechanism

External stakeholders can use the grievance mechanism through the following channels:

- Verbal statements during face-to-face meetings/visits
- Phone calls to the Project Company/CLO
- Grievance boxes and forms located at the centre in Project affected neighbourhoods (These boxes will be checked by the CLO on a weekly basis and registered to the grievance log immediately.)
- E-mails to the Project Company

The steps listed below summarize the external grievance mechanism process:

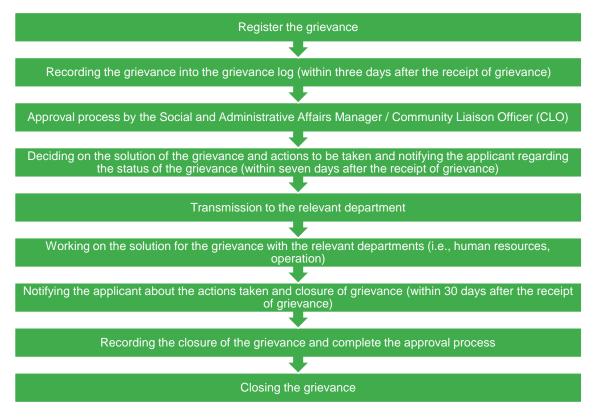


Figure 6.1: Steps of the External Grievance Mechanism Process

A sample grievance log that has been utilized by the Project Company was shared with Mott MacDonald for review. However, a number of improvement areas were identified, and the revisions were applied to comply with the Lender's requirements. The revised grievance log is provided in Annex Section A.3.

As part of the Project's external grievance mechanism:

Page 20

- The Project CLO will manage and monitor the grievance mechanism process in a close way since he is the main contact point on site for the stakeholders.
- In general, grievances are estimated to be resolved and closed within 30 days after the
 receipt. However, the timeline can change depending on the nature, subject and scope of
 the grievance. Accordingly, the Project Company will make a prioritization among the
 grievances by considering their nature, subject matters and scope. The resolution period for
 the grievances with high priority will be revised as seven days after the receipt of the
 grievance. For the grievances with medium priority, timeline will be 15 days and the
 grievances that are prioritized as low will be resolved within 30 days.

6.4 Internal Grievance Mechanism

Internal grievance mechanism covers the grievances of all employees working under the Project Company, its contractors, subcontractors and suppliers. The Project Company has formal employee grievance mechanisms. The grievance boxes placed in the project site are the primary mechanism to follow up the complaints from the workers. It will record the date, time, source, location and nature of each request, suggestions and complaints in the grievance records. The boxes should be locked, grievance forms were available, and the areas were out of sight of cameras.

In the worker camp where the grievance boxes are placed, there are instructions in Turkish. The registration and follow-up of the subcontracted workers' grievances first reaches and evaluated by the site manager, then the EPC Contractor Environment, Health and Safety (EHS) Manager manager and finally the CLO and Grievance Committee. A sample form to be used in the internal grievance mechanism is given in Annex Section A.4.

In addition to grievance boxes, it is also planned to process complaints more easily into the online system with the QR code application.

The following will be applied for all grievance channels for the successful implementation and management of internal grievance mechanism:

- Grievances will be classified and prioritized depending on their subjects while registering to the grievance log. Accordingly, resolution period for the grievances with high priority is recommended to be seven days after the receipt of the grievance. For the grievances with medium priority, it is 15 days and the grievances that are prioritized as low can be resolved within 30 days.
- After the grievances are successfully closed and the corrective actions are taken, the results of the grievances including anonymous grievances will be displayed on the notice boards within the Project site.

In summary, all Project staff will be able to report their grievances through one-to-one meetings, petitions, telephone calls, e-mails, online forms, and collective meetings.

6.5 Grievance Mechanism Channels and CLO Contact Details

The channels listed below can be used for receiving grievances. As stated in the previously prepared SEP, the Social and Administrative Affairs Manager of the Project Company operates these grievances in line with the Lender's requirements.

Grievance Mechanism Channels

- Official letter and/or petition to;
 - The Head Office (Ord.Prof.Fahrettin Kerim Gökay Cad. No: 36, 34662, Altunizade, Üsküdar, İstanbul, Türkiye)
- Phone number of CLO: [Placeholder: Phone Number of CLO will be inserted here]

• The corporate e-mail address: [Placeholder: e-mail address will be inserted here]

YIMER: Foreigners Communication Centre

The "Foreigners Communication Centre" (YIMER) provides an opportunity for foreigners to convey grievances. YIMER will be available for foreign Project stakeholders (including subcontractor workers) to report their Project-related grievances through the following communication channels:

- Website: <u>http://www.yimer.gov.tr</u>,
- Call Centre: 157, or
- Phone number: +90 312 157 11 22.

7 Resources and Responsibilities

The Project Company will have the overall responsibility and commitment to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1.

The CLO undertakes and supervises engagement with all stakeholders in relation to the Project and uses available resources to ensure that the relevant activities are conducted effectively. Other responsibilities of the CLO are as follows:

- Act as the primary point of contact for engagement and liaison with the local communities during the lifetime of the project.
- Develop and maintain good relationships based on trust with project affected people.
- Responsible of management and documentation of the public grievance mechanism, including resolving the incoming complaints, informing the stakeholders and communicating with the stakeholders.
- Conduct regular meetings with the project affected communities.
- Contribute to the management of relations with public institutions, local people and all other stakeholders in line with the Project Company's environmental and social policies, other procedures and international standards.
- Responsible of documentation regarding community relations activities and keeping records.
- Support execution of social projects planned in line with the common needs of the local people.
- Support aid, donation and sponsorship activities.
- Support land acquisition activities in project affected settlements when necessary. Facilitate communication to build understanding and support. Responsible of record keeping of all land acquisition related stakeholder engagement activities.
- Report all hazards, non-conformances and grievances related to the EHS management of the project to the EHS Manager.
- Support the Human Resources Specialist in implementation of the internal grievance mechanism.
- Ensure the Security Management Plan is implemented by all personnel and subcontractors, including the construction site and the accommodation camps. Review and update the plan as required.
- Implement a monitoring program to verify the effectiveness of security measures.
- Develop necessary monitoring and reporting forms and establish appropriate document control procedures.
- Conduct internal security audits including the construction site and the accommodation camps, and record identified non-compliances.
- Ensure related trainings are provided to personnel and subcontractors.
- Oversee subcontractors' security compliance through the subcontractor monitoring program.
- If monitoring indicates any non-compliances, investigate the non-compliance and ensure that immediate corrective actions are taken.
- Review and assess any security incidents to prevent their reoccurrence.

Together with the CLO, the parties of interest for the implementation of the internal grievance mechanism of the Project are listed below with the explanation of their responsibilities:

Site Manager

- Review and finally approve this procedure;
- Ensure sufficient resources to implement the procedure;
- Organize the routine work of Grievance Committee (GC).
- Environment, Health and Safety (EHS) Manager
 - Draft and propose this procedure to site manager and management team;
 - Ensure that the workings of this procedure are known and followed by all parties;
 - Work as a member of GC.
- CLO & Grievance Committee
 - Ensure that received grievances are registered, formally recorded, reviewed, resolved and the concerned person is informed in a timely manner.
 - GC will not consider complaints related to the procurements or with matters pending in the court of law, or aspects that are not relevant to Contractor scope of work.
 - In resolving the disputes, the GC will take into consideration the following:
 - Merit of the complaints/case received for consideration;
 - Evidence to take a decision on the complaint;
 - Witness statements;
 - Plausibility of the case in the light of related project activity;
 - Applicable laws, environmental guidelines of Türkiye, EIA of the Project, and
 - Best international practices;
 - Observations made on the field; and
 - Available information on previous complaints of similar nature.

The Project Company will be responsible for monitoring, evaluation and reporting activities, overseeing progress related to the Project activities, outcomes, and results.

This SEP is a live document; therefore, it will be reviewed and updated regularly by including the stakeholder engagement activities carried out during the construction, and operation phases of the Project. The updated version will be published on the Project website on an annual basis. The SEP will be monitored by the relevant representatives of the Project Company to maintain effectiveness and quality.

The CLO will also prepare reports on a semi-annual basis during construction phase and on an monthly basis during operation phase, which will summarize the following:

- The number of Project-related grievances received within the particular reporting period, their resolution status with actions taken/ to be taken, and the number of those resolved within the prescribed timeline
- Stakeholder engagement, consultation and disclosure activities are conducted within the particular reporting period together with the outcomes of these activities.

Additionally, Project Company's CLO makes regular entries by following a form that tracks all stakeholder activities. This form includes grievances, requests, information acquisition, as well as stakeholder interviews, field studies, public participation meetings, institutional stakeholder communication activities and any kind of interaction occurred with local community members.

Although the CLO is the person primarily responsible for managing the process of updating and monitoring the SEP, he/she will keep the form up to date with the support of HR and OHS-E team.

These reports / forms will be shared with the relevant representatives of the Project Company and the Lender for monitoring the ongoing progress on the stakeholder engagement and consultation activities.

A. Annex

A.1 Sample Project Consultation Log

No	Date	phone call, face-	Authorized Person Conducting the Activity (i.e., CLO, Project Company representatives)	The Subject of the Engagement/Consultation Activity (i.e., current Project status, information disclosure, regular visit)	Type and Name of the Stakeholder Engaged (Community/Public, Mukhtar, etc.)	Number of Stakeholders Engaged	Meeting Place and Time	Notes from the Activity (i.e., employment requests, road safety grievances)	Comments/Feedback of the Authorized Person (i.e., CLO, Project Company representatives) after the Engagement
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									

A.2 Revised Project Grievance Register Form (Turkish and English)

Şikâyetin Alındığı Yer /		Tarih /	
Location of Complaints		Date	
Received			
Alan Yetkilisinin Adı /		Şikâyet Kayıt N	
Name of Person In charge		Complaint Regis	SIEI
Sikâyete Konu Alanın		Number	
Koordinatları /			
Coordinates of the area subject to complaint			
Arazi parsel numarası (Şikâyete arazi konulu ise) /			
Land Parcel Number (If complaint is related to land)			
ŞİKÂYET SAHİBİ HAKKINDA Bİ	LGİ / COMPLAINANT INFO		
formda belirtmesi gerekmektedi	vermeden anonim olarak doldurabilir, ancak ker ir. / The Complainant may submit application an dicate the feedback mechanism to respond.		
Ad Soyad /		Şikâyetin Geliş Yolu	/
Name Surname		Form of Complaint:	
T.C. Kimlik No/		Telefon- Ücretsiz hat	/
Identification Number		Phone – Free phone lin	1e
Telefon / E-posta Telephone / E-mail		Halk Toplantısı / Community meeting	
Mahalle- İlçe- İl /			
Neighbourhood – District- Province		Dilekçe / Petition	
ŞİKÂYET DETAYLARI / DETAILS	S OF COMPLAINT		
Şikâyet Konusu /			
Complaint			
Şikâyet sahibi tarafından talep e	ədilen çözüm /		
Solution requested by the Compla	inant		
Şikâyeti Alan Yetkilinin Ad Soya	ad ve İmzası / Şikâyet Sahibinin Ad Soyad ve İmz	zası /	
Name Surname and Signature of	the Registerer Name Surname and Signature of Co	mplainant	

A.3 Sample Project Grievance Log

Registration number	Date of receipt and registration	grievance f received? f (via s Grievance f	Name of the responsible staff receiving grievance	Information about the applicat blank if application is anonym			(Leave Is)	category o	Description of the grievance	Priority of the grievance (High, Medium, Low	Due date of the addressing the grievance	Responsible person/ department for follow- up	Grievance status (open, closed, pending)	Action planned	of action taken	Supporting documents for grievance closeout and resolution
		meeting, telephone etc.)		Name and surname		Telephone and/or e- mail	District									

A.4 Internal Grievance Register Forms

	Suggestion and Compla	int Form
Date		
	Name/Surname	
Employee	Unit	
Employee	Phone	
	E-mail	
	Satisfaction	
_	Suggestion	
Туре	Grievance	
	Information Request	
Торіс		
Explanation / Statement		
lt will k	Evaluation be filled in by the department cor	ducting the evaluation.
Evaluator		
Date		
Result		
	Feedback	
Has the employee who created back?	ated the form received any	Yes / No
Explanation / Note		