



Meltem Enerji Elektrik Üretim A.Ş.

MELTEM ENERGY ELECTRICITY PRODUCTION INC.

EGE Wind Power Plant 6 MWe Capacity Increase

Stakeholder Engagement Plan

(Plan No: EGE-PLN-SOC-SEP-001)

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**PROJE MÜŞAVİRLİK MÜHENDİSLİK
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Prepared by

MGS Project Consultancy Engineering Trade Ltd. Co. (MGS)

Pelin Deniz YOĞURTÇU	Project Manager / International Projects Coordinator
Hilal AYDIN	Project Engineer / Environmental Engineer
Fikret VAROL	Project Engineer / Environmental Engineer
Lütfiye Hazal GÜÇLÜ	Project Engineer / Environmental Engineer
Begüm AYDOĞAN	Project Engineer / Environmental Engineer
Cansu GÜLER	HSE Expert / Environmental Engineer
Hüseyin GÜNGÖR	HSE Expert
Furkan AKSU	Sociologist
Merve YILDIRIM	Sociologist



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List of Abbreviations

Aol	Area of Influence
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ETL	Energy Transmission Line
GDZ EDAŞ	Gediz Elektrik Dağıtım A.Ş. / Gediz Electricity Distribution Inc.
GMP	Grievance Mechanism Procedure
GN	Guidance Note
HS	Health and Safety
IFC	International Finance Corporation
ISO	International Standards Organization
KPI	Key Performance Indicator
km	kilometer
MGS	MGS Project Consultancy Engineering Trade Limited Co.MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti.
MV	Medium Voltage
MWe	Megawatt Electrical
MWm	Megawatt Mechanical
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
Project Company	Meltem Energy Electricity Production Inc.
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff
TEDAŞ	Türkiye Elektrik Dağıtım Anonim Şirketi / Turkish Electricity Distribution Corporation
TKYB	Türkiye Kalkınma ve Yatırım Bankası A.Ş./ Development and Investment Bank of Türkiye
The Project	EGE Wind Power Plant 6 MWe Capacity Increase Project
WPP	Wind Power Plant

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for “EGE Wind Power Plant 6 MWe Capacity Increase Project” (“Project”). This SEP, which identified target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according to the National Environmental Legislation, Development and Investment Bank of Türkiye (“TKYB”) Environmental and Social Policy and International Finance Corporation (“IFC”) Performance Standards (“PS”s). The reference number of this Plan is EGE-PLN-SOC-SEP-001.

This is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

1.1 Purpose

The goal of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders. The purpose of this SEP is to:

- identify stakeholders and their interest to the Project,
- set out applicable management interfaces,
- define roles and responsibilities,
- outline the applicable project standards relevant to this Plan,
- define Project commitments, operational procedures and guidance relevant to this Plan,
- define monitoring and reporting procedures, including the key performance indicators (“KPI”s) of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,
- outline communication tools.

This Plan also aims to create long-term relations between the Project and local communities based on mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, its investments, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant

parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

The other purposes of this SEP are to describe the most effective methods by:

- keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
- understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.2 Background and Project Description

Meltem Energy Electricity Production Inc. was established as an Incorporated Company on 24/09/2007. It operates with Istanbul Chamber of Commerce. The company is included in the Electric Energy Generation "Nace Code" Sector in the Energy Profession Group Main Category. Meltem Energy Electricity Production Inc. is the owner of Ege Wind Power Plant (WPP) located in Kemalpaşa District in İzmir Province and Şehzadeler District in Manisa Province, which has a Production License dated 20/12/2011 and numbered EÜ/3553-12/2178. The location of the plant area given below in Figure 1.1 Location of the Project.

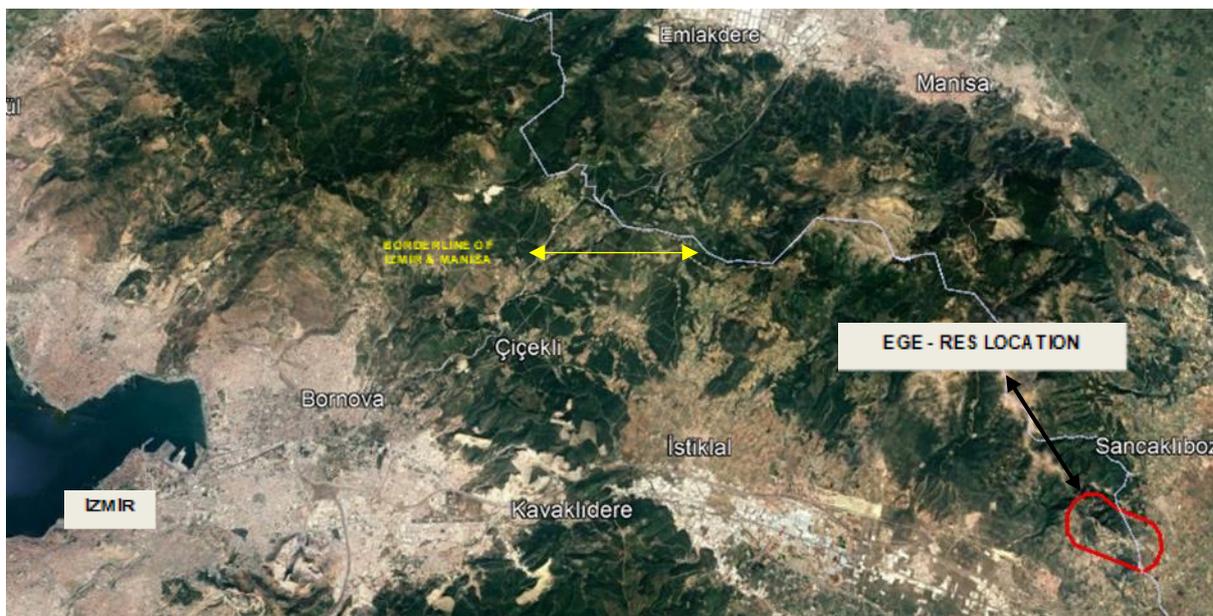


Figure 1.1 Location of the Project

EGE WPP is the first investment of Meltem Energy in the sector which is started 2015 with the use of 4 Enercon brand (T1, T2, T3, and T4) E70 model turbines with a power of 8 MWm / 7

MWe. Ege WPP project increased its installed capacity to 9.2 MWm / 7 MWe with a mechanical upgrade in 2021. In 2023, 2 additional Enercon Brand E-82 model turbines (T5 & T6) were additionally installed to reach 15.2 MWm/ 13 MWe installed capacity within scope of the project. Construction of 2 turbines has been completed and acceptance of the Ministry of Energy and Natural Resources was made 06/01/2024.

EGE Wind Power Plant 6 MWe Capacity Increase Project is planned to be installed in existing Kemalpaşa District in İzmir Province and Şehzadeler District in Manisa Province on a total area of 55,834,02 square meters. "Occupancy Permit" application will be applied for the project and then "Business License" will be received.

Within the scope of the EGE WPP project licensed for production numbered EÜ/3553-12/2178 and included (4 units which are T1, T2, T3, and T4) turbine, switchyard, energy transmission line (ETL) and access road (Sum of turbines, switchyard & access road is 83,107.00 m²), access road (55,834.02 m²) in the area which regarded as forest, the Ministry of Agriculture and Forestry has provided certain permission until 20.12.2060 with the approval of the office dated 14.04.2014 and numbered 68.

Moreover, within the scope of the permit report dated 02.06.2023 issued to Izmir Forestry Regional Directorate for the scope of the project, 14,987.85 square meters (which are T5, T6) of turbines, 1,762.06 square meters of switchyard, 8,205.72 square meters of power transmission line and 30,878.39 square meters of access road, in a total area of 55,834.02 square meters of forest has provided additional certain permission for having the value of paid was grante in to Meltem Energy Electricity Production Inc. until 20.12.2060.

The locations of the Tubines in operation are given below in Figure 1.2.

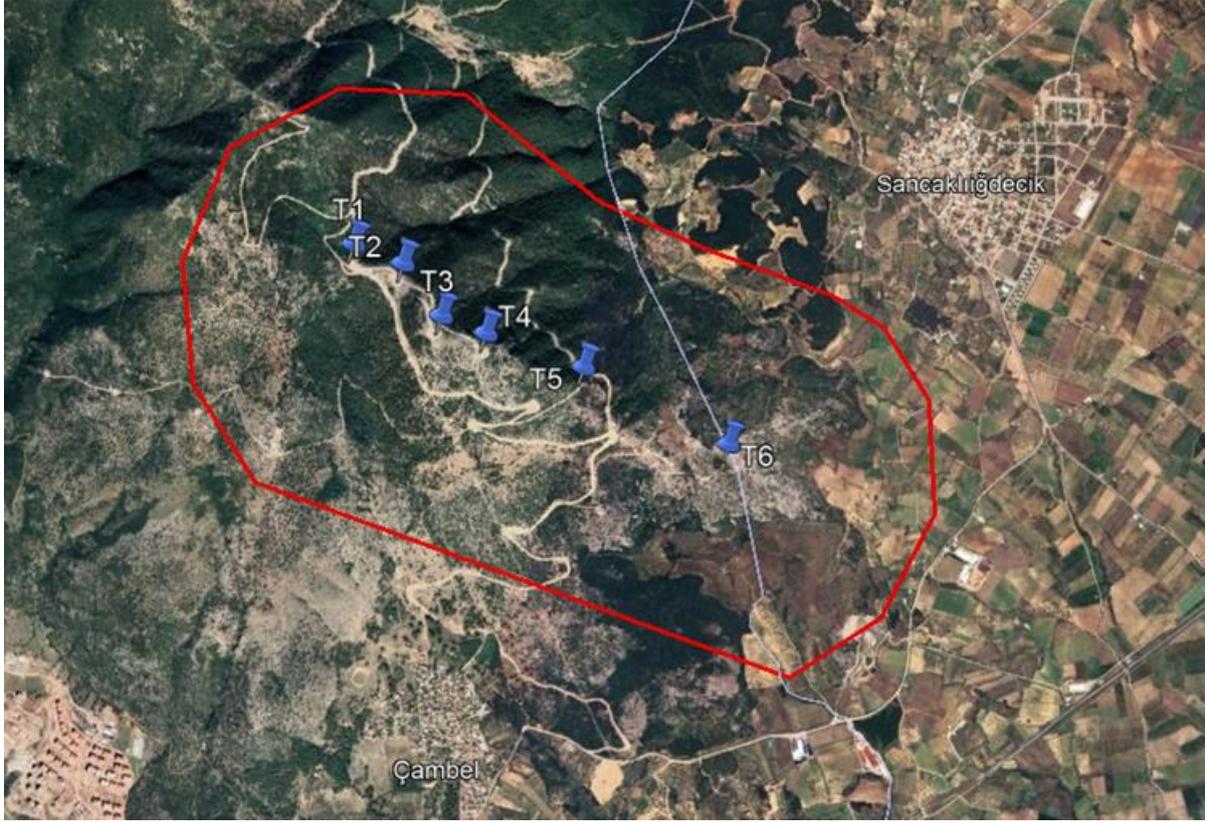


Figure 1.2 Locations of the Turbines

For the mentioned 6 turbines, the connection point to the system is Kemalpaşa Substation and the voltage levels are determined as Medium Voltage ("MV").

The completion period of the plan for the 6 MW power for T5 and T6 turbines has been determined as 22 months starting from 10.04.2023. Based on this, the estimated average annual production amount will be 48,000,000,000 kWh/year.

The pathways of the turbine points and their permit status are shown in the Figure 1.3.

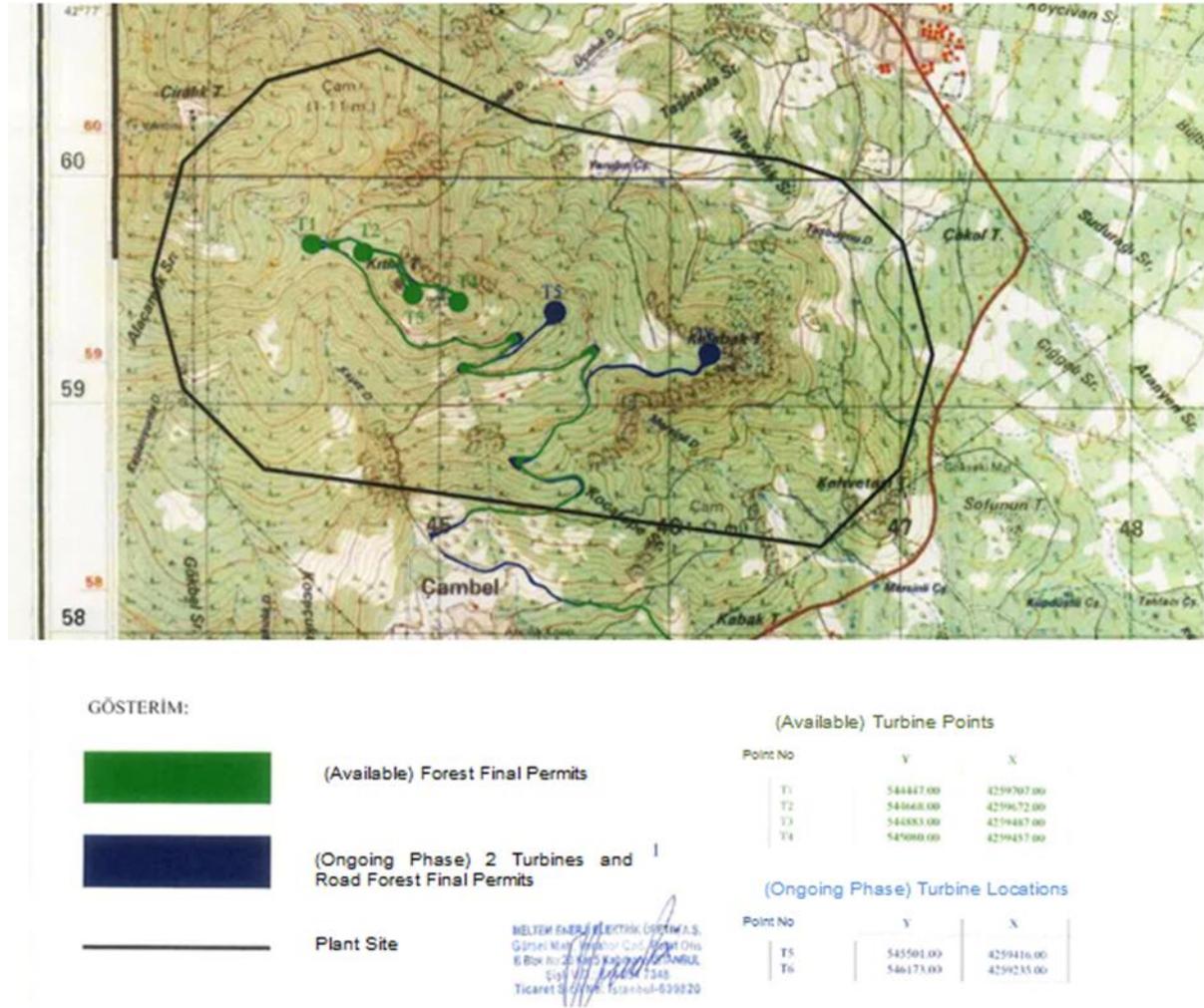


Figure 1.3 Site Plan

Gediz Electricity Distribution Inc. (“GDZ EDAŞ”) operates the Distribution Level Connected Lines with the temporary acceptance made on October 14, 2015. Expropriation studies were carried out for the 1st Stage of EGE WPP which was performed by GDZ EDAŞ / TEDAŞ. There has been no expropriation of the Energy Transmission Line within the scope of the capacity increase (for T5 and T6), which is the 2nd Stage of Ege WPP.

Distribution license number ED/874-33/693 has been granted to GDZ Electricity Distribution Inc. in accordance with the Electricity Market Law No. 4628 and related legislation to carry out electricity distribution activities in İzmir and Manisa Provinces for 30 years starting from 01/09/2006 with the decision of the Energy Market Regulatory Authority dated 24/08/2006 and numbered 874-33.

With the decision of the Energy Market Regulatory Regulation Board dated 10/03/2016 and numbered 619-12, it was decided to apply Article 30 of the Expropriation Law No. 2942 to GDZ Electricity Distribution Inc. to regarding the immovables owned by the General Directorate for State Hydraulic Works, General Directorate for Roadways and Kemalpaşa Municipality legal

entities, which are necessary for the "Ege WPP - Kemalpaşa - Armutlu Distribution Center Energy Transmission Line" established in İzmir Province.

Moreover, it has been decided that there is public benefit in the expropriation of the immovable properties specified in accordance with Article 19 of the Electricity Market Law No. 6446 With the decision of the Energy Market Regulatory Regulation Board dated 24/08/2006 and numbered 874-33 for the "Ege WPP - Kemalpaşa - Armutlu Distribution Center Energy Transmission Line" established in İzmir Province.

Establishment of right of easement was approved for immovables under the ownership of the Ministry of Treasury and Finance and immovable properties under the rule and savings of the State by the decision of the Energy Market Board dated 10/03/2016 and numbered 6149-11 within the scope of Ege WPP - Kemalpaşa - Armutlu Distribution Center Energy Transmission Line establishment by GDZ Electricity Distribution Inc. in Kemalpaşa District of İzmir Province.

One of the future plans for the EGE Wind Power Plant is the addition of 11 units of turbines (from T7 to T17) into operation. The point location of these turbines determined, but it is still in the EIA process. In addition, 24 MWm/ 26.2 MWe storage capacity increase will be planned after 2025 and a License Modification application has been made. As a result, 20 MW, 20 MWh was received.

The planned future field of the EGE WPP project is given in the Figure 1.4 Layout Planned for the Future below.

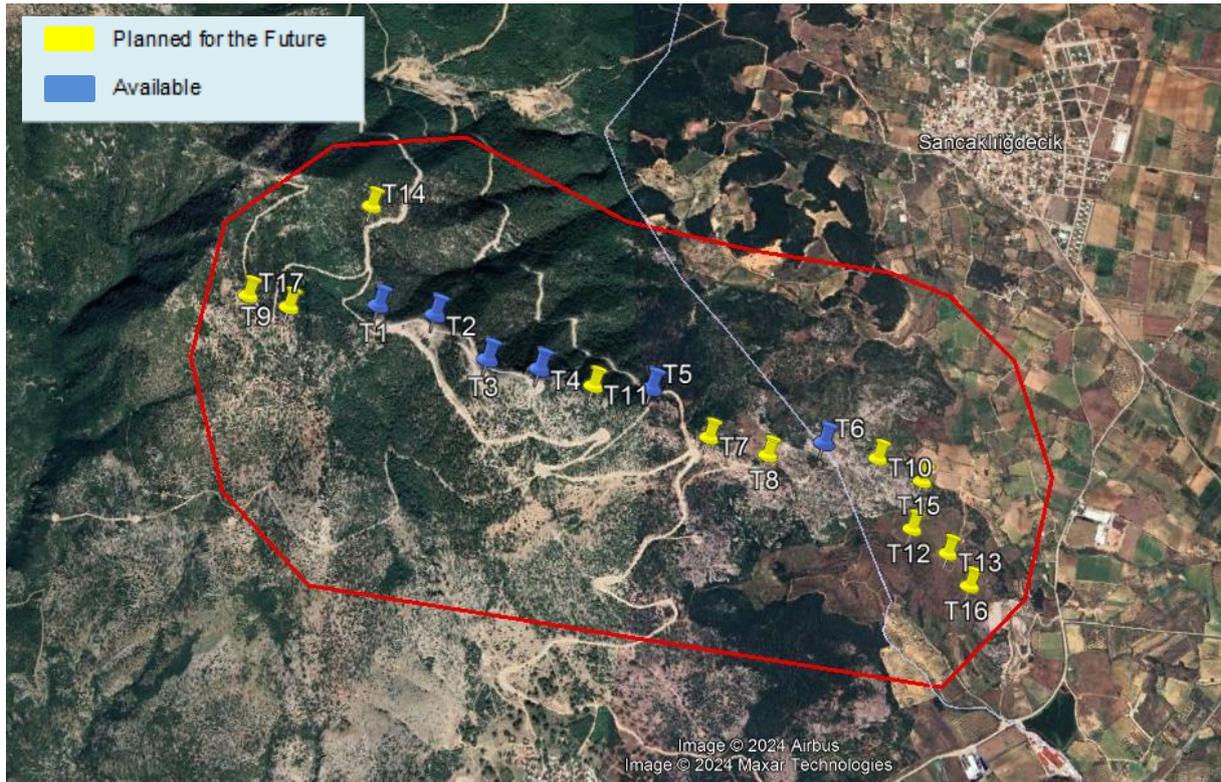


Figure 1.4 Layout Planned for the Future

Historical order of EGE Wind Power Plant project details:

- EGE-1: 9.2 MWm / 7MWe
 - In 2015, 4x 2 MWm / 1.75 MW = 8 MWm / 7 MWe was commissioned with 4 E70s.
 - In 2021, with a capacity increase of 1.2 MWm, the current operating power became 9.2 MWm / 7 MWe.
- EGE-2: 6 MWm / 6MWe
 - Total Capacity: 15.2 MWm / 13 MWe.
 - In 2023, it is planned to reach 15.2 MWm / 13 MWe installed capacity with 2 E82 3 MW turbines.
 - Turbine Brand Model: Enercon E-70 and Enercon E-82
 - Number of Units: 4 units 2.3 MWm / 1.75 MWe
 - 2 units 3 MWm / 3MWe
 - Facility Completion Date: 10.02.2025
- Capacity Expansion with Storage: 20 MWm/ 20MWe, 20 MWh
 - After 2025, License Amendment has been applied for 24 MWm / 26.2 MWe capacity increase with storage. 20 MW, 20 MWh has been purchased.

1.2.1 Area of Influence

Populations, closest distances and directions to the Project area are given in the table below and the Project Area of Influence (“Aol”) is given in Table 1-1. The impact area is determined as a circle with a radius of 1 km.

Table 1-1 Distances to the Nearest Settlements and Demographic Information

Settlement District and Province	Distance to the Project Area (km)	Direction	Population ¹		
			Total	Male	Female
Sancakliğdecik Neighborhood	~0.70	Northeast	1.021	514	507
Çambel Neighborhood	~0.92	Southwest	3.104	1.580	1.524

1.3 Scope

This Stakeholder Engagement Plan covers all Project activities including associated facilities and contractors’ activities during the operational phase of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

This Plan is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- Environmental and Social Management Plan (EGE-PLN-HSSE-ESMP-001),
- Internal and External Grievance Mechanism Procedure (EGE-PRC-SOC-GMP-001),
- Occupational Health and Safety Management Plan (EGE-PLN-HSSE- OHSMP-002),
- Emergency Response Plan (EGE-PLN-HSSE-ERP-003),
- Biodiversity Management Plan (EGE-PLN-HSE-BMP-001),
- Noise Management Plan (EGE-PLN-HSE-NMP-002),
- Traffic Management Plan (EGE-PLN-HSSE-TMP-004),
- Community Health and Safety Management Plan (EGE-PLN-HSSE-CHSMP-005),
- and
- Waste Management Plan (EGE-PLN-HSE-WMP-003).

¹ Turkish Statistical Institute. (2021). *Address-based population registration system (ABPRS)*. Central Distribution System TUIK. <https://biruni.tuik.gov.tr/medas/?kn=95&locale=tr>

1.4 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally Appropriate	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Vulnerable People	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

1.5 Key Principles

During the implementation of this Plan, following principles will be followed to achieve an effective stakeholder engagement.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.

- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.

2 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section. Key roles and responsibilities for the implementation of this Plan are outlined in Table 2-1.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
<p>Top Management / Director of Project</p>	<ul style="list-style-type: none"> ➤ Approval of this plan, ➤ Ensuring this procedure will be implemented during the lifetime of the Project, ➤ Determines policies and targets, ➤ Appointing the Factory Manager / Project Manager, ➤ Ensuring that Factory Manager / Project Manager is aware of his/her responsibilities in the scope of this procedure, ➤ Evaluating the reports provided by Factory Manager / Project Manager and ensuring necessary actions were taken.
<p>Factory Manager / Project Manager</p>	<ul style="list-style-type: none"> ➤ Providing necessary resources for proper implementation, ➤ Coordinating with parties for proper implementation of this procedure, ➤ Reporting to the Top Management / Director of Project about system performance, ➤ Determining the project information and social budget of the project, ➤ Making the final decision concerning internal / external, grievances (if needed) in the light of the assessments of Social Responsibility Staff, Health and Safety (“HS”) Manager and Environment Representative.
<p>Social Responsibility Staff (“SRS”) / Administrative Affairs Officer</p>	<ul style="list-style-type: none"> ➤ Records all formal and informal engagement activities with local communities in stakeholder management system, ➤ Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports,

Roles	Responsibilities
	<ul style="list-style-type: none"> ➤ Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, ➤ Forms relationships with the Project stakeholders, ➤ Organizes stakeholder meetings to collect the responses to grievances actively as required, ➤ Provides regular reporting back to the community on the management related to community grievances, ➤ Determines and provides the necessary training materials for employees, ➤ Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.), ➤ Shows best efforts to resolve all complaints in one month, ➤ Searches the causes of the grievance and the social incidents that cause, injuries, delays or stoppage in the work and disputes among the Project and communities, ➤ Monitors all complaints and ensures that all complaints are resolved and closed, ➤ Follows the results of complaint and report on a monthly, and annual basis, ➤ Records and reports general and local employment rates and complaints, which are received or observed verbally, ➤ Filling out the “Grievance Register Form & Consultation Form” (see Annex A: Grievance Register Form and Annex B: Consultation Form ➤ Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed), ➤ Implements the Stakeholder Engagement Plan (“SEP”) and GMP.
<p style="text-align: center;">Environment Representative</p>	<ul style="list-style-type: none"> ➤ Determining the national and international legislations that are applicable to the Project activities and informs the Factory Manager / Project Manager, ➤ Determining the environmental impacts and Occupational Health and Safety (“OHS”) hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, ➤ Ensuring that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the construction stage and to audit the performance of the Contractors, ➤ Making periodic inspections of the performance of Contractors of its operations during the construction phase. Determining and provides the necessary training materials for employees, ➤ Providing answers to the OHS, environment and social grievances raised by employees, the local community and local institutions,

Roles	Responsibilities
	<ul style="list-style-type: none"> ➤ Helps SRS for keeping the record of the complaints / suggestions in the Grievance Database with details, ➤ Supporting SRS on the first evaluation of the relevance of grievances collected, ➤ Supporting SRS for recording all formal and informal engagement activities, ➤ Conducting internal audits / site audits and determining corrective measures, if necessary, ➤ Identifying the need for OHS and Environmental trainings, ➤ Checking the Environmental records and performance reviews of Contractors, ➤ Providing control of Risk management and Crisis management process, ➤ Ensuring drills conducting and provide feedback training programs for corrections of defectiveness within drills, ➤ Monitoring the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained, ➤ Ensuring proper implementation of the Plan.
<p>Contractors / Subcontractors</p>	<ul style="list-style-type: none"> ➤ Complying with the requirements and standards of this plan, ➤ Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence ➤ Following the rules listed in this Management Plan and other relevant Management System documentation of the Project

3 PROJECT STANDARDS

This plan developed for EGE Wind Power Plant 6 MWe Capacity Increase Project will comply with the related national and international requirements and standards. The Project Standards involves:

- applicable Turkish Standards and National Legislation
- Turkish Environmental Impact Assessment (“EIA”) requirements,
- other commitments to and requirements of Turkish Government authorities,
- applicable international standards and guidelines.
- Environmental and Environmental Protection in TKYB Lending Process Social Risk Management Procedure,
- IFC Performance Standards.

3.1 Applicable Turkish Standards

The Constitution of The Republic of Türkiye

The main document of the national requirements and standards is “The Constitution of The Republic of Türkiye” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

X. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

VII. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are

regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labor Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental, or moral development

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

3.2 Turkish EIA Requirements

According to the document dated 21.01.2008 and decision no. 573 from the Provincial Directorate of Environment and Forestry of Izmir Governorship, the "Wind Power Plant" project, which is included in the Annex-II List of the Environmental Impact Assessment Regulation published in the Official Gazette dated July 17, 2008 and numbered 26939, has been evaluated and the measures foreseen to be taken against environmental impacts in the "Project Introduction File" have been deemed sufficient. Moreover, it has been determined that there is no need to prepare an EIA Report, and the project in question has been given the "Decision that Environmental Impact Assessment is not Necessary" by the Governorate in accordance with Article 17 of the EIA Regulation.

3.3 Environmental and Social Policy of TKYB

Within this scope, the TKYB closely follows and implements national legislation, laws and regulations to manage its environmental and social impact while fulfilling its legal obligations. It consistently follows national and international developments within the industry and best practices in environmental and social issues. The Bank supports and joins all kinds of environmentally friendly activities and volunteering efforts particularly concerning education and the environment, along with all public and civil society organizations as well as other shareholders who enhance social prosperity and development.

While reducing its negative impact stemming from operational activities, the Bank supports positive environmental movements with its efforts to increase energy and resource efficiency. To this end, the Bank regularly monitors energy, water and paper use, air emissions, waste generation and greenhouse gas emissions and aims to improve its reduction performance.

The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,

- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system,
- Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

In addition, TKYB has an "Environmental and Social Risk Assessment Procedure in the Lending Process", which aims to evaluate the environmental and social risks of the loans requested from TKYB and to ensure that the issue is managed effectively in line with TKYB's strategy.

Credit requests are evaluated according to the List of Unfunded Activities within the framework of TKYB's Environmental and Social Policy, and the projects included in this list cannot be credited by TKYB. The Environmental and Social Risk Assessment Model described in the Environmental and Social Risk Assessment Procedure is applied to all loans not included in the above-mentioned list. The following steps are included in the environmental and social risk assessment and monitoring process:

1. Unfunded Activity List check
2. Supply of project documents
3. Environmental and social risk assessment and pre-classification
4. Checking the environmental and social risk assessment of the loan and making the final classification
5. Preparation of Environmental and Social Action Plan
6. Checking the project evaluation report
7. Informing the customer about the Action Plan
8. Including the Loan Approval and Action Plan in the Loan Agreement
9. Environmental and Social Monitoring
10. Recording the results of the Environmental and Social Evaluation Annual Implementation.

3.4 Other Commitments and Requirements

There are no other applicable commitments and requirements of Turkish Government authorities related to this plan.

3.5 IFC Performance Standards

The international standards and guidelines which the Project will follow are set by International Finance Corporation (IFC). IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (“PS”1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (“GN”1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions*

Key objectives of *PS1* related to external grievance management are:

- To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,
- To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks, and impacts to workers, Affected Communities, and the environment.
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

- To develop a grievance mechanism to receive and facilitate the resolution of Affected Communities’ concerns and grievances related to environmental and social performance of the Project,
- To identify the risks and impacts of the Affected Communities and other stakeholders,
- To maintain an understandable, culturally appropriate, accessible and transparent consultation to stakeholders through early and ongoing engagement,
- To inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.

- To follow the developed grievance mechanism to receive and respond to stakeholder concerns related to the Project promptly.
- To establish a monitoring and review procedures of the concerns and grievances raised by Affected Communities and stakeholders.

Key objectives of PS2 related to worker grievance management are:

- To create equal, fair, and nondiscriminatory working opportunities for every worker,
- To develop, maintain, and improve the worker-management relationship,
- To promote compliance with national employment and obey the labor laws,
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain by developing a reliable grievance mechanism,
- To identify, evaluate and respond to workers concerns and grievances in a timely manner,
- To promote safe and healthy working conditions to direct and indirect workers,
- To avoid the use of forced and child labor.

Key requirements implemented by the Project according to PS2 are as following:

Human Resources Policy, Terms of Employment and Working Conditions & Relationship

- The Project will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits.
- The Project will make all policies understandable to all workers.
- The Project will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

- The Project will comply with the national labor law which contains rights of workers to form and to join workers' organizations.
- If national law restricts the right to organize and workers' organizations, the Project will enable the means for workers to bargain collectively and to organize and establish an alternative way for workers to file grievances.
- The Project will not discriminate against workers who choose to organize and create equal conditions for all the workers.
- Worker representatives should be given access to management.

Non-Discrimination and Equal Opportunity

- The Project will hire, promote, and compensate workers solely based on their ability to do the job and all workers are provided equal access to training, tools and opportunities for advancement.
- The Project will ensure that all workers will be free from harassment by management or other workers.

Retrenchment

- The Project will establish and implement a procedure to mitigate the adverse impact of retrenchment and carry out an analysis of alternatives to retrenchment.
- The procedure will incorporate non-discrimination principles and include the input of workers, their organizations, where appropriate, the government.

Child Labor

- The Project will not employ workers under the minimum age for employment as defined by national law.
- Workers between the minimum age and 18 will not be employed in dangerous work or work that interferes with their education or development.

Forced Labor

- The Project will not employ forced labor which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty and
- The Project will respect and protect rights of workers to retain their personal documents and money.
- The Project will respect the rights of workers to leave the workplace after work.

Grievance Mechanism

- The Project will provide a grievance mechanism for workers and develop it as a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- The Project will ensure that there will be no discrimination against those that express grievances, and all the grievances are considered seriously and take prompt, appropriate action.
- Any grievance mechanism will not replace other channels as defined by law or collective bargaining agreements.

Occupational Health and Safety

- Workers are not unreasonably endangered at work or in dormitories and all the necessary precautions to mitigate work-related risks and develop an emergency prevention and response system.
- Workers will be provided personal protective equipment and will be trained in its use.
- The Project will document and report accidents, diseases, and incidents during the Project.

Workers Engaged by Third Parties

- The Project will extend the labor standards performance policies and procedures to contractors hired directly or through employment agencies.
- The Project will not use contracting as a means of circumventing labor rights and laws and will ensure all the workers have access to a grievance mechanism.
- The Project will monitor contractors, employment and recruitment agencies to verify their adherence to labor rights and laws.

Supply Chain

- The Project will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- The Project will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.
- The Project will monitor the performance of suppliers according to PS2 requirements concerning child labor and forced labor and significant safety issues.

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

Within the scope of the Environmental and Social studies conducted by MGS, a face-to-face interview was held with Manisa Provincial Directorate of Agriculture and Forestry on January 15, 2024.

MGS also conducted face-to-face interviews on 16.01.2024 with project personnel in the field and the Mukhtar of Çambel Neighborhood, the closest settlement to the project area. An online meeting was held on 22.01.2024 because the mukhtar of Sancakliğdecik Neighborhood, one of the nearby settlements, was not in the neighborhood.

The Mukhtar of Çambel Neighborhood stated that the residents of the neighborhood were informed about the project, while the Mukhtar of Sancakliğdecik Neighborhood stated that the residents of the neighborhood were not informed about the project.

These interviews were conducted to identify stakeholders, evaluate stakeholder engagement and relationships, and identify specific complaints and requests. During the interviews, the effectiveness of current stakeholder communication and current concerns, recommendations and expectations were discussed.

Common expected positive impacts obtained from these interviews are as follows:

Expected positive effects on the basis of neighborhoods:

- The Project is very important for settlements close to.
- The company's diversification of aid activities for the social needs of the neighborhoods near the project area.
- The project will strengthen the local community in socio-economic and socio-cultural contexts by developing cooperation with the company and the headmen of nearby settlements.

Suggestions on the Basis of Neighborhoods:

- Developing a communication and complaint mechanism for Sancakliğdecik neighborhood that takes into account the demands of the local community.
- Supporting the local people to meet their needs such as mosque, school and housing construction.

Concerns:

No concern was raised.

4.1.1 Limitations

Due to the small number of employees in the office, a limited number of samples had to be selected. Only a consultant personnel work in the project office. There are no female employees hired for the Project at the site office. There are no temporary settlers in the project area. Sancakliğdecik Neighborhood Headman, who was identified within the project area, could not be reached during the site visit.

A face-to-face meeting was held with The Mukhtar of Çambel Neighborhood in Mukhtar's Office, and only an online meeting could be made with The Mukhtar of Sancakliğdecik Neighborhood.

An appointment was made with Ulucak Forest Sub-district Directorate and Şehzadeler Forest Sub-district Directorate, which were identified as stakeholders, but the meeting could not be held due to the meeting. Afterwards, communication was tried to be established via telephone. However, communication could not be established via telephone for the same reason. On

15.06.2024, a face-to-face meeting was held with Manisa Provincial Directorate of Agriculture and Forestry.

Table 4-1 Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Local Community	The Mukhtar of Çambel Neighborhood	16.01.2024 Muhktar's Office	<ul style="list-style-type: none"> • The population of the neighborhood is 3000. • The main source of income of the majority of the neighborhood is pension. It was stated that agriculture is practiced to a lesser extent. • The company's communication with the mukhtar is effective and efficient. • Communication is carried out by phone or face to face. • It was stated that there is no situation that requires to make a written complaint. • It was stated that the necessary assistance was provided by the company. • It was noted that the project did not cause any damage to the access roads to the neighborhood. 	
Local Community	The Mukhtar of Sancaklıiğdecik Neighborhood	22.01.2024 By the phone interview	<ul style="list-style-type: none"> • The population of the neighborhood is 1400. • The main livelihood of the majority of the neighborhood is agriculture. The main agricultural products are grapes, cherries and olives. • The company's communication with the mukhtar is limited. • It was indicated that no information was given regarding the submission of complaints. • It was stated that an informational meeting was held, but the place where the meeting was held was not sufficient due to difficult transportation. • It was indicated that the local people did not have any information about the project, but they did not have any serious complaints about the project. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
			<ul style="list-style-type: none"> The Mukhtar requests that the company contact him. 	
Local Institution	Manisa Provincial Directorate of Agriculture and Forestry	15.01.2024 Directorate Office	<ul style="list-style-type: none"> The company's communication with the institution is effective and efficient. As positive effects of the project, it is stated that it provides employment to local people during the construction phase and creates a renewable and clean energy source. It has been stated that it may be dangerous for flying animals as a negative effect. It is recommended that the company provide support to nearby settlements. 	<ul style="list-style-type: none"> He did not want to be photographed.
Employee of the Project	Interview of Blue-Collar Employee	16.01.2024 Project Office	<ul style="list-style-type: none"> The interviewer stated that he has been working in the company as a consultant for 9 years. Working hours are 08:00-17:00. Weekends are holidays. He provides transportation to the project area with his own vehicle. He eats his meals at home. A meal fee is provided. He can use his annual leave whenever he wants. Ohs, first aid and fire training were provided by the company. He receives his salary regularly. In addition to salary, he receives fuel aid, bonuses and meal fees. When there is a problem related to the project area, it provides a solution by communicating it verbally to the manager. It finds OHS measures sufficient. Break times are flexible. 	<ul style="list-style-type: none"> He did not want to be photographed.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
			<ul style="list-style-type: none"> Since the employee is a local resident, he also expressed his opinions about the company's communication with the local people. He stated that the company's communication with its local people is effective and efficient. 	
Employee of the Project	Interview of White-Collar Employee	16.01.2024 Project Office	<ul style="list-style-type: none"> The interviewer stated that he had been in the project team for 4 months. There are 5 people in the team. Working hours are 09:00-18:00. Weekends are holidays. The company covers accommodation expenses. Transportation to the project area is provided by a vehicle rented by the company. It charges a meal fee. He received OHS training. He receives his salary regularly. Apart from salary, food, transportation and accommodation expenses are covered by the company. When there is a work-related problem, he provides a solution by verbally notifying his manager. Break times are flexible. 	<ul style="list-style-type: none"> He did not want to be photographed.

4.2 Stakeholder Identification

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening a wide array of potential stakeholders, including institutions, associations, Non-Governmental Organization (“NGO”s) and other informal groups, which should be involved in the engagement process.

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context. The identified stakeholders are presented in Table 4-2.

Table 4-2 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<i>External Stakeholders</i>		
Local Communities (Settlements in the Aol)		
Mukhtar and residents of the following neighborhoods <ul style="list-style-type: none"> • Sancaklığdecik Neighborhood • Çambel Neighborhood 	✓	✓
Government		
<ul style="list-style-type: none"> • Governorship of Manisa • İzmir Regional Directorate of Forestry • Manisa Provincial Directorate of Agriculture and Forestry • Ulucak Forest Sub-district Directorate • Şehzadeler Forest Sub-district Directorate 		✓
Municipality		
<ul style="list-style-type: none"> • Kemalpaşa Municipality • Şehzadeler Municipality 	✓	✓
NGOs		
<ul style="list-style-type: none"> • Şehzadeler Mukhtars Association 		✓
<i>Internal Stakeholders</i>		
<ul style="list-style-type: none"> • Project Employees • Contractors/Subcontractors/Suppliers 	✓	✓

4.3 Stakeholder Engagement Program

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation. The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Management Plan (“ESMP”),
- Meetings with regulatory bodies,
- Public meetings, where necessary,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

- Activity / project,
- Type of information disclosed,
- Location and dates of meetings / forms of communications,
- Stakeholder groups consulted.

In this respect, the following the stakeholder engagement program presented in is developed accordingly.



Table 4-4. Stakeholder Engagement Program

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<p><u>Information Disclosure</u></p> <ol style="list-style-type: none"> 1. Purpose, start date, duration, and nature of installation and operations activities, 2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts, 3. Closure options and impacts on local communities, 4. Grievance mechanism disclosure, 5. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results, 6. Continue disclosing information via the Project company website. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<p><u>External Grievance Mechanism</u></p> <ol style="list-style-type: none"> 1. Disclosure of grievance mechanism to communities, 2. Disclosure of grievances received and resolved to communities. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	SRS
<ul style="list-style-type: none"> ➤ Local business and industries ➤ All affected settlements and mukhtars ➤ Project Workers 	<p><u>Employment and Procurement Strategies</u></p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Procurement of supplies and services. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<p><u>Use of Emergency Response and Preparedness</u></p> <ol style="list-style-type: none"> 1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders, 2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	<p>Drills</p> <p>Workshops</p> <p>Community meetings</p>	<p>Annual drills or as required</p>	<p>HS Manager and Environment Representative Consultant</p> <p>SRS</p>
<ul style="list-style-type: none"> ➤ NGOs 	<p><u>Social progress, economic and social development, and environmental protection</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Mitigation measures against potential environmental and social risks, 2. Sustainability criteria, 3. Social responsibility projects, implementation principles, 4. Cumulative impacts of project in the region. 	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	<p>As required / As requested</p>	<p>SRS</p>
<ul style="list-style-type: none"> ➤ Local industries ➤ All affected settlements and mukhtars 	<p><u>Road Transportation</u></p> <ol style="list-style-type: none"> 1. Road safety awareness, including on safe crossing of the bypass and access roads, 2. Types, number, and frequency of vehicles that can be anticipated through different phases of the Project, 3. Collaboration with local communities and responsible authorities to improve signage, visibility, and overall safety of roads, particularly along stretches located near schools or other locations where children are present, 4. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), 5. Communication of traffic measures and Project Road usage with mukhtars and other industries. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually face to face meetings</p> <p>As requested, / as needed for others</p>	<p>SRS</p>



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
<ul style="list-style-type: none"> ➤ All affected settlements and mukhtars 	<p><u>Management of environmental and social risks of the Project</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Environmental monitoring program 2. Environmental monitoring results 3. Overall information about progress of the Project 4. Cumulative impacts in the region 	<p>Meetings with mukhtars</p> <p>Brochures</p> <p>Workshops</p>	<p>As required / As requested</p>	<p>SRS</p> <p>Environment Representative Consultant</p>
<ul style="list-style-type: none"> ➤ Vulnerable Groups 	<p><u>Employment and any other interest of vulnerable groups</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Use of roads, water, and other infrastructure, increase in traffic density, 4. Local employment, 5. Important commercial opportunities, 6. Environmental impacts. 	<p>Meetings targeting any identified vulnerable groups</p> <p>Women meetings and focus group discussions</p>	<p>Meetings during the installation and operation</p> <p>As requested / as required for other meetings</p>	<p>SRS</p>
<ul style="list-style-type: none"> ➤ Workforce ➤ All affected settlements and mukhtars ➤ Local industries ➤ Local government 	<p><u>Community Health</u></p> <ol style="list-style-type: none"> 1. Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities, 2. As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually face to face meetings</p> <p>As requested / as needed for others</p>	<p>SRS</p>
<ul style="list-style-type: none"> ➤ Employees of the Project ➤ Project Contactor employees 	<p><u>Employee welfare</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures, 4. Contractor management. 	<p>Face to face interview</p> <p>OHS Committee</p> <p>Labor audits</p>	<p>Monthly or when required due to the results of grievance mechanism</p>	<p>SRS</p>

4.4 Tools & Methods for Information Disclosure

The Project will provide transparent informative material to the affected communities and the stakeholders in a consistent and timely manner. The manner in which this material will be disclosed as discussed in the sections below.

4.4.1 Internal / Website

Although there is no web site specific to the existing facility, there is a website serving on behalf of the Polat Energy in both Turkish and English. On this website, there are informative brochures, advertisements about the company, campaigns, and a contact form (<https://www.polat.com/>).

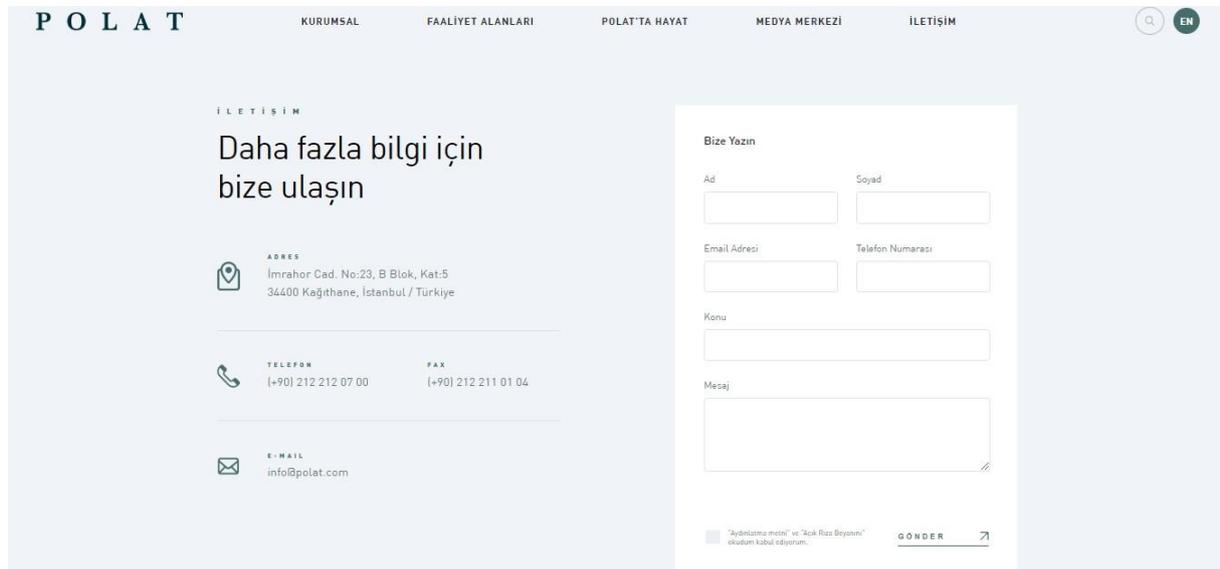


Figure 4.1 Contact Webpage of Polat Energy

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned website and at the facility offices. Copies of these information sheets will be posted at the headman offices of the affected communities identified as stakeholders.

4.4.3 Responding to Local Communities and Publications for the Communities

Authorities of the facility give full and timely responses to request, complaints and recommendations of local communities in addition to implementing the grievance mechanism procedure. All requests are treated respectfully. In the event that it is not possible to meet a

particular request, then a detailed explanation as to why not, will be given through the use of grievance mechanism procedures.

At the Project website, material providing information about the Project will be available, and stakeholders will be kept posted. When needed, particular matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities on the basis of impact assessment surveys carried out by the Project. As long it is appropriate, relevant Project information will be disclosed to the public.

4.4.4 Disclosure Activities

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities should be widely and proactively publicized, especially among Project affected parties, at least 1 week prior to any meeting via website announcements, through headmen and posted information banner in headmen' offices,
- The location and timing of any meetings will be designed to maximize accessibility to Project affected stakeholders, if needed transportation arrangement will be made by the Project to increase participation in meetings,
- The information presented (via presentations, leaflets, website publications etc.) will be clear and non-technical and will be presented in the local language understood by those in the communities,
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Project will encourage the stakeholders to raise their concerns/complaints and suggestions, and
- Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up on, the person who raised the issue will be informed after the meeting when the issues resolved.

Project related information communication meetings will be open to the entire public and will be announced through local headmen. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Headman offices. If needed, separate meetings can be organized at venues frequently visited by women for women-only meetings. The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP, Grievance Mechanism Procedure, Non-Technical Summary, etc.) and how they can submit comments, complaints and suggestions.

5 MANAGEMENT OF GRIEVANCE

5.1. Grievance and Feedback Procedure

As discussed, grievances are complaints, suggestions, and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People.

Grievance Mechanism Procedure (EGE-PRC-SOC-GMP-001)) of the project provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible, and transparent manner.

Grievance procedures will be coordinated through the appointed SRS, who is the primary interfaces between the community and the contractor. Complainants will have the chance to provide their names to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from either Corporate Communications or Human Resources department. The SRS is expected to conduct a bridge between the firm and the employees, to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the company SRS if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, contractors, and other suppliers of the Project.

5.1.1 Principles of the Grievance Mechanism (Internal and External)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- **Keeping it up to date:** The process will be regularly reviewed by the SRS. Regular monitoring and evaluation should be conducted continuously.

- **Confidential and impartial process, non-retribution:** The process will be confidential and impartial, without employees fearing retribution.
- **Reasonable timescale:** A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

5.1.2 Collection, Registration and Evaluation of Grievances

Handling of grievances (collection, registration, and evaluation) will follow these steps:

- Initiate the grievance procedure, mainly by the SRS,
- SRS registers the grievance/comment in the grievance database (see Annex D: Grievance Database),
- The SRS investigates the grievance and makes the first evaluation with the help of relevant responsible department,
- Final decision is made, and further action is implemented to solve the grievance,
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started,
- The complainant is informed about the resolution (at most in 30 days after the grievance is received),
- The grievance is officially closed after related documentation (see Annex C: Grievance Closure Form) is completed, and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated by SRS and other relevant departments; however, handling and tracking should be ensured to be done mutually.

A complaint form is prepared for official notification of complaints about the project (see Annex A: Grievance Register Form) “Open door policy” shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

5.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 days, after the receipt of the grievance. If the complainant has provided a name and contact information, this

will give the chance to inform them about the status of their grievance within 5 days of grievance receipt.

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is important in maintaining a 'social license to operate'.

The SEP will be reviewed and revised (if needed) annually during steady-state operations, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated.

5.1.4 Grievance Mechanism Communication

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places.

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the induction training sessions will also include the stakeholder engagement and grievance mechanism process trainings,
- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings,
- The grievance/suggestion boxes will be made available at the Project site offices for internal grievances; and
- All employees will be aware of the location of the grievance/ suggestion boxes and how to submit their grievances (either through web site or with grievance/ suggestion boxes).

For the collection of internal grievances from community:

- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement meetings (including the locations of the grievance/ suggestion),
- Stakeholders will be aware of the location of the grievance/ suggestion forms presented on the website and how to submit their grievances (either through web site or with grievance/ suggestion boxes).

The grievance mechanism constitutes two parts: External and Internal (Workers, contractors, and suppliers of the Project). These two mechanisms will have the same respondent; SRS. That is, External and Internal Grievance Mechanism will be run by SRS. A sample of the grievance form is presented in Annex A: Grievance Register Form.

5.2. Contact Details

Table 5-1 Details of Contact

Contact Person on the Project Site
<p>Name: Bilal Kocahüseyinoğlu</p> <p>Title: Administrative Permits Specialist</p> <p>Phone: +90 542 546 71 61</p> <p>E-Mail: bilal.kocahuseyinoglu@polatenerji.com</p>

6 MONITORING

6.1 Key Monitoring Activities

The Project will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health, and safety (labor rights) and social performance of the Project mainly through:

- Revision, improvement or extension of the monitoring activities, parameters, locations, and frequency,
- Reviews and revisions of the management plans and procedures.

The Project will monitor the effectiveness of the engagement processes by analyzing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and

- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are set out in Table 6-1.

Table 6-1 Key monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	<p>The project company will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> ➤ number of outstanding complaints and grievances opened in a month, ➤ number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), ➤ number of complaints grievances closed in the month; and ➤ type of grievance. 	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records (see <i>Annex B: Consultation Form</i>)	Monthly	Site office
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Annually	Site office

6.2 Key Performance Indicators (KPIs)

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KPIs are given in Table 6-2 below.

Table 6-2 Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measures
Total number of external complaints or grievances	Total number reduced year on year	Grievance Database
Total number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Total number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Respond stakeholders within 5 days at last / delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Monthly reports
% of all complaints (internal, external, customer) that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (installation), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report
% item of Social Responsibility Program that implemented	Target of 80%	Annual reports

7 TRAINING

All necessary training will be provided as induction training to provide general awareness for all employees of Project Company and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of SEP will be followed by the Social Responsibility Staff, and other responsible personnel and supervisors of Project Company. Contractors are also involved in or overseeing activities with local communities.

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers. The trainings will be given in the first “Induction Training” session. All employees of Project company and contractors are required to participate in community relations and human rights training.

7.2 Job Specific and Other Training Requirements

Job -specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the implementation of the Stakeholder Engagement Plan and Grievance Management is also provided to the SRS and other responsible personnel with supervisors of Project company.

8 AUDIT AND REPORTING

8.1 Internal and External Auditing

Internal and External Audits will be carried out to ensure the assessment of the social responsibility program and overall stakeholder engagement. Conformance and aspects of this SEP, which are subject to regulatory audits, will be monitored in accordance with the project management system and separately by Project Lenders. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

8.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings,
- Social responsibility activities and community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings, and stakeholder engagement activities,
- Audits, investigations, and incidents which will be managed.

On monthly basis, an overview for grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/ closed out and engagement activities as completed/ongoing will be recorded periodically. SRS will evaluate and conclude this overview with project management in the monthly progress meetings.

ANNEXES

Annex A: Grievance Register Form

Annex B: Consultation Form

Annex C: Grievance Closure Form

Annex D: Grievance Database

Annex A: Grievance Register Form

Grievance Register Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: _____ <div style="text-align: right; font-size: small;"> What happened? Where did it happen? Who did it happen to? What is the result of the problem? </div>		
Case summary:		
Date of Incident/Grievance		
	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details):		

Annex B: Consultation Form

Consultation Form									
Reference No:									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			Communication Type						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

Annex C: Grievance Closure Form

Grievance Closure Form			
Reference No:			
Determination of Corrective Action(s)			
1			
2			
3			
4			
5			
Responsible Departments			
Close Out the Grievance			
This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.			
Date: /...../.....	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;"> Name Surname / Signature of the Person Closing the Complaint </td> <td style="width: 50%; text-align: center; vertical-align: top;"> Name, Surname / Signature of Complainant </td> </tr> </table>	Name Surname / Signature of the Person Closing the Complaint	Name, Surname / Signature of Complainant
Name Surname / Signature of the Person Closing the Complaint	Name, Surname / Signature of Complainant		

** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.

The logo for MGS (Müşavirlik Mühendislik Ticaret Ltd. Şti.) features the letters 'MGS' in a bold, dark blue font. A red stylized arrow or '7' shape is integrated into the letter 'S', pointing downwards and to the right.

PROJE MÜŞAVİRLİK MÜHENDİSLİK
TİCARET LTD. ŞTİ.

Şehit Cevdet Özdemir Mah. Öveçler 4. Cad.,
1351. Sok., No:1/6-7, Çankaya/ANKARA
Tel: 0.312.479 84 00 (pbx), Faks: 0.312.479 84 99
www.mgsmuhendislik.com