



STAKEHOLDER ENGAGEMENT PLAN

March 2024

CNR-PLN-ERZ-SEP-001

Final



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LIST OF ABBREVIATIONS/DEFINITIONS

AC	Alternating Current
AIIB	Asian Infrastructure Investment Bank
ÇİMER	Presidential Communication Center of Turkish Republic
ÇINAR	Çınar Engineering Consultancy Inc.
CEIU	Compliance, Effectiveness, and Integrity Unit
CLO	Community Liaison Officer
Covid-19	Coronavirus Disease-2019
CRF	Complaint Register Form
DC	Direct Current
E.g.	<i>exempli gratia</i> (for example)
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
etc.	<i>et cetera</i> (and others)
ETL	Electrical Transmission Line
GBV	Gender Based Violence
GM	Grievance Mechanism
GRF	Grievance Registration Form
GRM	Grievance Redress Mechanism
ha	Hectare
IC İÇTAŞ	IC İÇTAŞ Solar Energy Production and Trade Inc.
i.e.	<i>Id est</i> (So)
IFC	International Finance Corporation
Inc.	Incorporated company
KPI	Key Performance Indicator
kV	Kilovolt
MAP	Management Action Plan
MENR	Republic of Türkiye Ministry of Energy and Natural Resources
MH	Republic of Türkiye Ministry of Health
MoEUCC	Republic of Türkiye Ministry of Environment, Urbanization and Climate Change
MWac	Megawatt Alternating Current
MWdc	Megawatt Direct Current
MWe	Megawatt Electric
MWm	Megawatt Mechanic
MWp	Megawatt Peak
NGO	Non-Governmental Organization
No.	Numbered
OIZ	Organized Industrial Zone
PAP	Project Affected Person
PIU	Project Implementation Unit
PPM	Public Participation Meeting
PPM	The Project Affected People's Mechanism
PS	Performance Standard
PV	Photovoltaic
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment

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SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
TEMA	The Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection of Natural Habitats (<i>Türkiye Erozyonla Mücadele, Ağaçlandırma ve Doğal Varlıkları Koruma Vakfı</i>)
WBG	World Bank Group
WHO	World Health Organization
YEKA	Renewable Energy Resources Zones
YİMER	Foreigners Communication Center

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Appendix 1: Stakeholder List

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1. INTRODUCTION

Stakeholder engagement is the basis for building strong, constructive and responsive relationships necessary for the successful management of the Project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with various external stakeholders throughout the lifetime of the Project. Starting the engagement process at an early stage helps ensure timely public access to all relevant information and gives stakeholders an opportunity to engage in Project design and impact assessment.

Stakeholder Engagement Plan (SEP) will continuously contribute to the mutual communication between the Investor and various stakeholders. Information on the project, environmental and social risks and impacts, proposed mitigation measures, grievance mechanism will be shared with the project stakeholders on a regular basis.

SEP will include the identification of stakeholders, which will be contacted during the land preparation, construction and operation phases of the Project and of the communication tools to be used during the stakeholder engagement activities, together with the grievance mechanism and the responsible parties. The fact that stakeholder engagement is an active process is decisive in that it is periodically updated and integrated into the Environmental and Social Impact Assessment (ESIA) Report.

1.1 Project Overview

The Ministry of Energy and Natural Resources (MENR) of Republic of Türkiye sets forth their main strategies and policies in terms of renewable energy resources as to ensure the diversity of resources by prioritizing domestic resources, to increase the share of renewable energy resources in energy supply, to bring full functionality to free-market conditions, to improve the investment environment and to increase energy efficiency. In consideration of these strategies and policies, a government-supported initiative, YEKA (Renewable Energy Resources Zones) program was launched in 2016 with the objective to encourage the development of renewable energy projects, particularly wind and solar power. It was initiated together with the enforcement of "Regulation on Renewable Energy Resources Zones" published in the Official Gazette dated 09.10.2016 and numbered 29852.

In the scope of YEKA program, the General Directorate of Energy Affairs of MENR identifies specific areas of land that are suitable for the development of renewable energy projects and invites companies to the competitions to bid for the right to develop and operate these projects.

The competition for 4th YEKA was held for the solar power plant in Hürriyet Neighborhood, Erzin District of Hatay Province on June 28, 2022 and YEKA G4-Erzin-2 SPP was won by IC İÇTAŞ Energy Investment Holding Incorporated Company (or IC İÇTAŞ) (the Client) and YEKA Usage Right Contract was signed on August 8, 2022 with MENR. After obtaining the Preliminary License certificate, the Project was transferred from IC İÇTAŞ Energy Investment Holding Inc. to IC İÇTAŞ Solar Energy Production and Trade Inc. (the Client).

YEKA G4-Erzin-2 SPP Project (the Project) to be implemented by IC İÇTAŞ will have a total installed power of 140 MWm/100 MWe (140 MWdc/100 MWac) and an annual electricity production of 200,000,000 kWh. The intention of the Project is to significantly contribute to a renewable and zero-carbon supply of electricity to the national grid, contribute to Türkiye's energy transition, and help in meeting the rising demand for electricity in Türkiye.

The Project is evaluated as per the Environmental Impact Assessment (EIA) Regulation (Official Gazette dated July 29, 2022, and numbered 31907) and the activities under this Project are included in Annex-1 of the EIA Regulation. Accordingly, a national EIA Report has been prepared by ÇINAR Engineering Consultancy Inc. ("ÇINAR" or "ESIA Consultant") and



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submitted to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on January 3, 2023. As for the Project, an “EIA Positive” decision (Certificate No: 7100) was acquired from MoEUCC on May 10, 2023. On the other hand, the Environmental and Social Impact Assessment (ESIA) is prepared for the Client to apply to international financial institutions for financing of the Project.

1.2 Summary of Possible Social Impacts of the Project

The construction site installation works is projected to be started in July 2023; all land preparation, and construction works are planned to be completed within a 12-month period. The expected number of recruits during the construction phase is 80. It is projected that the plant will be put into operation at full capacity as of August 2024. The economic lifetime of the Project is 30 years and the number of personnel to be employed during the operation phase is planned as 20.

The potential social impacts and expected risks can be seen on the following items and the required mitigation measures are given right after the item;

- Local recruitment and local procurement
 - The actions and measures to be taken for the labor and employment will be in compliance with Turkish Labor Law and international standards. Prioritization will be given to the local recruitment.
 - The recruitment processes will be transparent, public and non-discriminatory, providing equal opportunities with respect to ethnicity, religion, language, gender and sexuality.
 - The employment opportunities will be disclosed explicitly through different channels.
 - A workers grievance mechanism will be in place.
- Working Conditions and Management of Worker Relationship
 - OHS Management Plan will be prepared and the workers will be trained on this Plan in accordance with the Regulation on the Procedures and Principles of Occupational Health and Safety Training.
 - Safe working environments will be created at the work sites.
 - All employees will be provided with personal protective equipment (PPE) and necessary training will be provided for their use.
 - Drivers and operators will be trained to comply with traffic rules and the Traffic Management Plan.
 - An Emergency Preparedness and Response (EPR) Plan will be prepared and the issues about the communicable diseases and the COVID-19 pandemic will be covered.
- Protecting the Workforce
 - Employment of child labor and forced labor will be prevented.
 - Particular concern will be paid on principles of non-discrimination and equal opportunity. Wages, work hours and other benefits will be per the Turkish Labor Law,
 - The workers will be informed about the worker grievance mechanism.
 - A Labor Management Plan will be prepared for the Project and the personnel will be trained on this Plan
- Workers Engaged by Third Parties and the Supply Chain
 - Subcontractors will be reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the labor conditions requirements,
 - The performance of subcontractors will be monitored such that human rights policy and labor rights of all workers are exercised properly,

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- The workers of subcontractors will have access to the grievance mechanism.
- Impacts/risks related to traffic and transport in terms of Community Health and Safety
 - A Traffic Management Plan will be developed to minimize potential traffic related impacts on the workers and nearby settlements areas and the personnel will be trained on the plan.
 - Traffic signs will be posted considering the provisions of the Regulation on Traffic Signs.
 - Traffic arrangements will be made considering the routine use of the roads by the local residents.
 - The speed limits stipulated in Regulation on Highway Traffic will be strictly followed.
 - Project personnel will be trained for safe driving.
 - A grievance mechanism will be in place.
- Risks on Community Health and Safety
 - A Community Health, Safety, and Security Management Plan will be prepared and the personnel will be trained on this management plan;
 - Security personnel will be employed to regularly monitor the facility and its surroundings.
 - Entry to the project area will be carried out in a controlled manner by the security personnel.
 - Emergency situations will be handled appropriately and in a timely manner, taking into account the elements specified in the Emergency Preparedness and Response Plan to be prepared.
 - it is significant to create an environment for the people to raise their concerns by informing them about the project, to hold regular stakeholder engagement activities in the settlements, and to create the opportunity to address the concerns of those who oppose the project
 - A grievance mechanism will be in place.

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2. REQUIREMENTS OF THE STAKEHOLDER ENGAGEMENT PLAN

The main objective of the SEP is to ensure that all relevant stakeholders (individuals, groups and organizations) affected by and/or interested in the project are involved in the project activities and the flow of information with these stakeholders is continuous throughout the project. Stakeholder engagement is an important activity for such projects; because it enables the stakeholders to be informed at every stage of the project, to express their expectations and concerns, and to establish an open communication channel with the stakeholders in the activities carried out by the investor. The general objectives of the SEP are as follows:

- Determining stakeholders directly or indirectly affected and/or interested in the project.
- Determining and planning of stakeholder engagement activities that will begin during the preparation and planning of the project and will continue during the construction and operation phases of the project.
- Determining the frequency of consultation activities, the level of disclosure information and engagement, as well as the content of consultation activities.
- Establishment of Grievance Mechanism that will create an open communication channel for stakeholders at every stage of the project.
- Ensuring that concerns and expectations raised by stakeholders are addressed in the ESIA and in the decision-making and planning stages of the project.

SEP has been prepared to meet the requirements specified in national legislation as well as International Finance Corporation (IFC) Standards, and Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (ESF).

The 'Lender,' comprising the IFC and the AIIB, are exploring the possibility of providing funding for elements of the project. The project will be implemented in accordance with local legislation, IFC Performance Standards (PSs) and AIIB ESF Environmental and Social Standards (ESS) requirements that are briefly described below.

2.1.1 National Requirements

Environmental Law: The Environmental Impact Assessment Regulation dated 29 July 2022 and numbered 31907 requires stakeholder engagement and disclosure. The Stakeholder Engagement Plan is defined in Article 4 of the Regulation as follows: *The plan in which it is explained how, by which methods and tools, communication will be made and information will be provided with legal/real persons (stakeholders) who may be affected by the project or who may affect the project or be related to the project, at all stages of the planned project,*

The Article of the Regulation is as follows:

- (1) In order to inform the public about the investment and to receive their opinions and suggestions regarding the project; With the participation of the institutions/organizations qualified by the Ministry of Environment, Urbanization and Climate Change (hereinafter 'the Ministry') and the project owner, a meeting to inform the public and participate in the process is held at a central place and time determined by the provincial directorate, where the relevant public, who is expected to be most affected by the project, can easily reach, on the date determined by the Ministry.
- (2) An announcement stating the date, time, place and subject of the meeting of the institutions/organizations qualified by the Ministry; It has get published at least 10 calendar days before the meeting date in a newspaper defined as a common periodical together with the local periodical published in the region where the project will be carried out.
- (3) The meeting of informing the public and participation in the process is held under the chairmanship of the provincial director or an official to be appointed. It is ensured the people are informed about the project and that their opinions, suggestions and questions

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are received in the meeting. Opinions, suggestions and objections expressed by the public are stated in the minutes to be written about the meeting. The meeting chair may ask the participants to give their opinions in writing. The meeting minutes are sent to the Ministry, one copy of which remains with the provincial directorate.

- (4) Before determining the special format, the commission members can examine the area where the project is planned and attend the information disclosure and process engagement meeting to be held on the announced date.
- (5) Stakeholder Engagement Plan is prepared by the institutions/organizations authorized by the Ministry in order to inform the public about the project and its effects and to receive the opinions and suggestions of the public regarding the project. The prepared stakeholder engagement plan is presented in the annex of the EIA application file. In cases where the Ministry deems necessary, during the EIA process for informing the public from the authorized institutions/organizations; may also request additional activities such as distributing informative brochures, conducting surveys, seminars, or sharing information by preparing a website related to the project. In addition, if requested by the Ministry, this plan is updated during the EIA process.

Right to Information Law: The Right to Information Law No. 4982 (published in the Official Gazette dated 24.10.2003 and numbered 25269) regulates the procedures and principles of the right to information in accordance with the principles of equality, impartiality and clarity, which are the requirements of a democratic and transparent government. Everyone has the right to obtain information about the activities of public institutions and professional organizations that qualify as public institutions.

The Use of Right to Petition Law No. 3071: Prime Ministry Circular on the Use of the Right to Information, published in the Official Gazette dated 4 January 2004 and numbered 25356. The second paragraph added to Article 40 of the Constitution of the Republic of Turkey, titled "Protection of fundamental rights and freedoms", with the Law No. 4709 dated 3.10.2001, the State is obliged to indicate which legal remedies and authorities the relevant persons will apply to and their durations. With the amendment made in Article 74 titled "Right to petition", it is stipulated that the petitioners are notified in writing of the results of their applications.

Personal Data Protection Law No. 6698 and Right to Lodge a Complaint: If the request pursuant to Article 13 of the Law is refused, the response of the data controller is found insufficient or the request is not answered by the controller within 30 days, the data subject may lodge a complaint with the Board within thirty days as of he/she learns about the response of the data controller, or within sixty days as of the request date, in any case. A complaint cannot be lodged before exhausting the remedy of the request to the data controller pursuant to Article 13. Complaints not meeting conditions laid down in Article 6 of the Law No. 3071 of 1/11/1984 on the Use of Right to Petition shall not be examined. As the request is mandatory and the complaint is optional, a data subject whose request has been refused implicitly or explicitly may both lodge a complaint with the Board and resort directly to the judicial or administrative jurisdiction. The right to compensation of those whose personal rights are violated, pursuant to the general provisions, is reserved. Article 15 of the Law determines the procedures and principles of the examination to be made by the Board. Upon complaint, The Board examines the demand and gives an answer to the data subjects. In case the request isn't responded in sixty days from the date of complaint the demand shall be deemed refused. As a result of the examination made upon complaint, in cases where it is understood that an infringement exists, the Board shall decide that the identified infringements shall be remedied by the relevant data controller and notify this decision to the relevant parties.

This decision shall be implemented without delay and at the latest within thirty days after the notification. Data subject has the right to file a lawsuit at the administrative courts against decisions concerning him/her made by the Board.

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Expropriation Law: Administration of the expropriation process; It is carried out in accordance with the Expropriation Law No. 2942 (published in the Official Gazette dated 08.11.1983 and numbered 18215) within its purpose, authority, procedure, reason and field of activity.

2.1.2 International Requirements

The international standards and local legislation communicated in the subheadings of this section and the stakeholder participation dimension of the Project will be presented in relation. The stakeholder participation methods that are necessary and appropriate to be applied, how to apply them, the frequency of the related methods according to the phases of the Project (construction and operation period), as well as the monitoring and reporting parts are presented in Table 4.1, Table 4.2 and Table 4.3.

The IFC's Access to Information Policy as a part of IFC's Disclosure Policy underlying the following points:

- Investment related information
- Advisory services related information
- Project results information

As well as “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works” consultations with people in the communities adjoining the project need to occur throughout the life cycle of the project. These regular consultations should provide opportunities to share information with communities on project-related risks and reporting and response measures, and to identify any issues that may arise with regard to SEA/SH. This means the consultations should have a particular focus on women, children and other at-risk groups—each of which may require different approaches to enable a safe space for discussion.

2.1.2.1 IFC Performance Standards

IFC Performance Standards can be evaluated as part of WB ESF including environmental and social standards except specific distinction in terms of implementation. IFC requirements can be seen in the following:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety, and Security
- PS5: Land Acquisition and Involuntary Resettlement Relocation
- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

Within the scope of IFC PSs, stakeholder participation is given as a requirement for the establishment of an Environmental and Social Assessment and Management System within PS1 (PS1.5). Stakeholder Participation as defined in PS1.25 within the same standard, “Stakeholder participation is essential for the establishment of strong, constructive and sensitive relationships necessary to successfully manage the environmental and social impacts of a project. The participation of stakeholders is a continuous process. Stakeholder participation, although its degrees vary, consists of analyzing and planning stakeholders, informing stakeholders, providing consultation and participation, creating a complaint mechanism and constantly reporting to Affected Communities. Although the form, frequency and level of effort of stakeholder participation vary significantly, it should be appropriate for the

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stage of development with the risks and negative effects created by the project." is expressed in the form.

PS1.26 and PS1.27 provide the requirements for stakeholder analysis and participation planning. Clients should identify stakeholder groups that may be interested in their activities and consider initiating a dialogue with stakeholders through external communications. If the Activity has certain physical features, sizes and/or facilities that are expected to have adverse environmental and social impacts on Affected Communities, the client will identify Affected Communities and meet the following requirements. The Client will prepare and implement a Stakeholder Engagement Plan appropriate to the characteristics and interests of Affected Communities, taking into account the risk, impacts and stage of development of the activity. Where appropriate, the Stakeholder Engagement Plan will include different measures to ensure the effective participation of those identified as disadvantaged or vulnerable. Where the engagement process relies heavily on community representatives, the client will use reasonable efforts to verify that they truly represent the views of the Affected Communities and are credible to accurately communicate the results of their consultation to members of the community they represent.

PS1.29 and PS1.30 describe meaningful and effective information sharing processes, and the complaint mechanism is defined in PS1.35, where the complaint mechanism standards for affected communities are given, as follows: "In the case of Affected Communities, the customer will create a complaint mechanism to learn about and help resolve the Affected Communities' concerns and complaints about the customer's environmental and social performance. The complaint mechanism should be proportionate to the risks and negative effects of the project and should serve the Affected Communities. The complaint mechanism should aim to address concerns urgently by using a culturally appropriate, accessible, understandable and transparent consultation process. The party expressing its concern or complaint should not face any price or sanctions. The complaint mechanism should not be an obstacle to applying for legal or administrative remedies. The Client will inform the Affected Communities about the complaint mechanism during the stakeholder engagement process."

Public Participation is defined in PS5.10 in projects where land acquisition is applied, and stakeholders and affected communities benefiting from ecosystem services are defined in accordance with PS6.6 and PS6.24 in projects where biodiversity needs to be protected.

The term indigenous people defined in PS7.5 is not compatible for Türkiye and is not covered.

2.1.2.2 Asian Infrastructure Investment Bank Environmental and Social Framework and Environmental and Social Standards (ESSs)

The Asian Infrastructure Investment Bank (AIIB) is a multilateral financial institution, whose purpose, as set out in its Articles of Agreement (Articles), is to: (a) foster sustainable economic development, create wealth and improve infrastructure connectivity in Asia, by investing in infrastructure and other productive sectors; and (b) promote regional cooperation and partnership in addressing development challenges by working in close collaboration with other multilateral and bilateral development institutions.

The Articles require the AIIB's operations to comply with policies addressing environmental and social impacts, among other policies. The Environmental and Social Framework (ESF) incorporates AIIB's policy addressing environmental and social impacts. This ESF, as amended through November 2022, replaces the May 2021 ESF and enters into effect on November 22, 2022.

The Environmental and Social Policy (ESP) of AIIB comprises mandatory environmental and social requirements for each Project and is accompanied by (a) three associated mandatory Environmental and Social Standards (ESSs) setting out requirements applicable to Clients on; and (b) an Environmental and Social Exclusion List (ESEL) which sets forth activities and items that are excluded from financing by AIIB and that the Client is required to exclude from the Project.

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The ESSs cover the following:

- ESS 1: Environmental and Social Assessment and Management,
- ESS 2: Land Acquisition and Involuntary Resettlement, and
- ESS 3: Indigenous Peoples.

ESS 1 (Environmental and Social Assessment and Management): When the Bank, AIIB, has determined, in consultation with the Client, that the Project is likely to have adverse environmental and/or social risks and impacts, it requires the Client to conduct an environmental and social assessment relating to these risks and impacts, and design appropriate measures to avoid, minimize, mitigate, offset or compensate for them, all as required under ESS 1. The objective of ESS 1 is to achieve the environmental and social soundness and sustainability of Projects and to support the integration of environmental and social considerations into the Project decision-making process and implementation.

ESS 1 applies if the Project is likely to have adverse environmental risks and impacts or social risks and impacts (or both). The scope of the environmental and social assessment and management measures are proportional to the risks and impacts of the Project. ESS 1 provides both for quality environmental and social assessment and for management of risks and impacts through effective mitigation and monitoring measures during the course of Project implementation.

ESS 2 (Land Acquisition and Involuntary Resettlement): If the Project is likely to involve Involuntary Resettlement the Bank requires the Client to address this in the social section of the assessment report, complemented by more in-depth coverage, as required under ESS 2. The Client covers this in a plan or framework, as applicable, which may be called a land acquisition and resettlement plan, land acquisition plan or resettlement plan (LARP/LAP/RP) or, in the case of a framework, a land acquisition and resettlement planning framework, land acquisition planning framework or resettlement planning framework (LARPF/LAPF/RPF). This plan or framework is provided to the Bank as a freestanding document, an annex to the assessment report, or incorporated as a recognizable element of the report.

The objectives of this ESS 2 are: (a) to avoid Involuntary Resettlement wherever feasible; (b) to minimize Involuntary Resettlement by exploring Project alternatives; (c) where avoidance of Involuntary Resettlement is not feasible, to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-Project levels and to provide resettlement assistance; (d) to understand and address gender-related risks and differential impacts of Involuntary Resettlement; (e) to improve the overall socioeconomic status of the displaced poor and other vulnerable groups; and (f) to conceive and implement resettlement activities as sustainable development programs, providing sufficient resources to enable the persons displaced by the Project to share in Project benefits.

ESS 2 applies if the Project would or may involve Involuntary Resettlement (including Involuntary Resettlement of the past or foreseeable future that the Bank determines is directly linked to the Project).

ESS 3 (Indigenous Peoples): If the Project would involve Indigenous Peoples the Bank requires the Client to address this in the social section of the assessment report, complemented by more in-depth coverage, as required under ESS 3. The Client covers impacts on Indigenous Peoples in an Indigenous Peoples plan (IPP) or Indigenous Peoples planning framework (IPPF), which is provided to the Bank as a freestanding document, an annex to the assessment report, or incorporated as a recognizable element of the report.

ESS 3 is not applicable for the Projects in Türkiye, since there is no communities or groups of people which can be identified/defined as indigenous peoples in the country.

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3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In order to realize stakeholder participation in an equal and fair way, stakeholders should be identified at the first stage of the activity. Thanks to this determination, it will be ensured that an effective SEP will be established that will enable all stakeholders of the activity to be accurately analyzed, including people and groups who are directly or indirectly affected by the activity, who are interested in the activity.

Stakeholder Identification is an important step in managing the overall stakeholder engagement process. It reduces the risk of a narrow stakeholder group dominating the consultation process.

Stakeholders expected to be directly or indirectly affected by the Project or related to the Project are listed below and additional stakeholders will be added during the Project period;

- Lenders
- Project owner
- National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Hatay Provincial Directorate of Environment, Urbanization and Climate Change, Erzin Municipality, etc.)
- Settlements close to the project area (Yukarıburnaz neighborhood and Hürriyet neighborhood)
- Project Affected Persons (PAPs) whose land has been acquired within the scope of the project
- Disadvantaged or vulnerable stakeholders (e.g. the elderly, the disabled, women, people whose lands will be expropriated for a second time, etc.)
- Non-Governmental Organizations
- Universities and their foundations, cooperatives, local business organizations, business associations, chambers of commerce
- Employees of the Project and contractors

A detailed list of stakeholders is provided in Appendix 1: Stakeholder List but individuals or groups not listed here will be able to contact the Project Owner and add their information to this list.

3.1 Stakeholder Identification

The main stakeholders with direct contribution/influence on the business cycle and other stakeholders who have a periodic/activity-based/in case of need direct/indirect contribution/effect on the business cycle.

3.1.1 Project Affected Parties

Project affected parties include individuals and groups expected to be directly or indirectly affected by the Project in terms of living standards and livelihoods/income sources. Local communities living in settlements close to the Project sites (Yukarıburnaz Neighborhood and Hürriyet Neighborhood) may be directly or indirectly affected by Project elements that affect their lives, for example, construction impacts (noise, emissions, vibrations, etc.). PAPs that include landowners/users that are able to use privately-owned/ public lands formally and/or informally are not expected to be directly affected by land acquisition affecting the Project's livelihoods/income sources. Employees of the Project and contractors are also considered as affected parties since their working conditions depend on the procedures and principles of the Project determined by the employers.

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3.1.2 Disadvantaged/Vulnerable Individuals or Communities

Under the category of “Parties affected by the Project”, vulnerable persons or communities that may be directly / indirectly affected by the Project are analyzed as follows;

- People with physical or mental disabilities
- People with chronic diseases
- Households using public lands
- Elderly people over 65 years old living alone and in need of care
- Female-headed households
- Child / Adolescent headed households

According to the 2022 Humanitarian Needs Overview for Syria, some 14.6 million people need humanitarian assistance, a 9 percent increase from the previous year. As of end-June, some 20,200 refugees and asylum-seekers were registered with United Nations High Commissioner for Refugees (UNHCR) in Syria. UNHCR provides protection and assistance to refugees, internally displaced people, returnees and stateless people based on identified needs and vulnerabilities.

As of February 2, 2023 UNHCR provided the maps to show Syrian refugees in Türkiye and Syrian refugees registered in South East Türkiye. In accordance with this data, registered Syrian refugees number is over 300 thousand, within Hatay. There are five refugee container camps with 24,242 people locates within East Mediterranean Sub region, which cover Hatay, Kahramanmaraş and Osmaniye provinces.

The outcomes and insights derived from the Mukhtar interview on October 23, 2023, regarding marginalized communities, encompassing Yoruks, women, individuals with disabilities, and earthquake survivors, are succinctly outlined as follows:

- Up to 30 Yoruk families are recognized as Aydınlı among the local populace due to their origin from the Aydın region.
- The number of women acting as sole household heads remains indeterminate, with social aid benefiting 600 individuals.
- There are 20 disabled individuals, encompassing both physical and mental disabilities, with potential for rehabilitation.
- Despite the absence of prevalent diseases, diabetes is widespread. Previously, environmental factors such as the iron and steel factory, newly established factories, and the prevalent use of chemical agricultural pesticides contributed to widespread lung cancer. For example, citrus trees underwent 13 rounds of pesticide spraying.
- The neighborhood comprises 1,600 households, featuring 73 severely damaged single-story buildings. Some families, as tenants, relocated to AFAD's container city, with nearly 1,000 houses being demolished.
- Although 150 households initially left post-earthquake, they returned after a maximum stay of two months, with at most 10 households potentially settling in the new location.
- Two container cities exist: one in the district center's AFAD area and the other, the largest, in Erzin. The latter primarily hosts government officials like soldiers, police, teachers, and prison employees on assignment. Additionally, there are individuals residing in unofficial containers, although the precise count remains unrecorded.

In relation to women, another insight from the interview indicates the absence of an organizational structure to facilitate their gathering for socialization in specific areas. As per the interview:

- There is an absence of organizational structures, such as associations or cooperatives, for women. They are not convened for bread-making, and there is no designated space or socialization area for them. They lack an environment where they can convene, although they have greatly benefited from public education. Some continue to engage

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in embroidery at home. Some of the households do not need additional income sources engaged by housewives' working.

Considering the interview data, a suitable environment for a focus group study with women could not be identified. However, in interviews involving earthquake survivors and Yoruks, participants were intentionally chosen from the female demographic.

3.1.2.1 Yoruks

The results of in-depth, face-to-face interviews consist of a female and a male Yoruk. All outputs are presented in the form of citations.

Female / Engaged in Livestock / 61 years old

The household is inhabited by two individuals. Losses have been experienced, and animal husbandry is being undertaken. However, there is no available space for animals in the designated area, leading to concerns about potential relocation. This place was also inhabited by their ancestors.

Large-scale livestock farming is absent, and the focus is on small-scale livestock farming, specifically goats. Over 140 animals, including 41 young ones, are sold as sacrificial animals. Milk sales are limited because these animals do not produce fertile milk. Approximately 30-40 kg of milk is produced daily from 100 goats, maintaining this pattern for 2-3 months, resulting in a total of 400-450 kg of milk. From 30 kg of milk, 6 kg of cheese is produced, crafted in the form of tulum cheese. All the milk is used for cheese production. Yogurt is also made for personal consumption. Cheese is produced based on customer orders, and the clientele consists of individuals from Erzin, Düziçi, Osmaniye, and Toprakkale.

Goats, particularly the Aydınli breed, are predominantly raised for sacrificial purposes. Among the goats, there are those of specific breeds provided through the Ministry of Agriculture's Elite Herd project, including blue-eared and red-eared goats.

Besides grazing, feed is predominantly utilized, and the pasture is not particularly lush. This practice stems from a historical habit, with no alternative available. The surroundings of the pasture are predominantly gardens and olive trees. Before the establishment of the Osmaniye Organized Industrial Zone in the 1970s, there was a forest in that area, which was utilized due to logging. At that time, the condition of the pasture was favorable.

Male / Engaged in Livestock / 60 years old

The area was initially settled by ancestors from Aydın, who later journeyed to Samsun and returned. The facility has had a notable impact, resulting in a reduction of pasture space. It is anticipated that livestock farming in this area will likely cease in the future, limiting the available space for goat grazing. The Tosyalı family owns land, and there are others engaged in livestock farming below. Their activities vary, particularly during corn harvest periods. Six households that temporarily left are expected to return in November. Typically departing in September-August, they return in November and engage in livestock farming until the following September. In contrast, the narrator remains in the area year-round, alongside 17-18 other families involved in livestock farming.

When grazing is not possible, feed is provided, including barley, chaff, wheat straw, and citrus straw. Ready-made feed is also purchased. The six-month expense for one animal, along with grazing, amounts to 1,000 TL. The animals consume two to three meals a day for six months and one meal a day for the remaining six months.

There are no alternative livelihoods, but if livestock farming were to end, the community could potentially work on the solar panels mentioned in the project. Approximately 8-10 individuals could be employed, possibly in driving or security roles. However, their understanding of the company's operations (project) is limited.

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Cheese buyers are individuals with whom they have had a relationship for 20 years; they call and place orders, with the order ready within a week. The products are not sold at the market due to this established customer relationship.

Due to a lack of electricity, storing milk and cheese is not possible. There is no cooperative connection, but affiliated cooperatives include the Osmaniye Small Livestock Sheep and Goat Breeders' Union and the Elite Herd Project based in Ankara. Two households in the community have these specific breed animals, distinguished by blue earrings (formerly red-pink). There is no other suitable place for livestock farming, and even now, the available space is limited to 3-3.5 months. In other areas, grazing areas are provided through auctions, requiring the participation of 3,000-5,000 animals.

Poultry farming also requires feed, and large-scale livestock farming is unsuitable in this area. An alternative income source could be working as day laborers in gardens, as each individual owns their citrus orchard, which is either leased or provided as compensation.

The land is unsuitable for orchard farming, potentially suitable for olive cultivation, but with low yields, except for 2-3 pieces of land in the region. Retirement is three years away, and proposed solutions include employment opportunities post-livestock farming. Electricity has vital importance to continue dairy products such as milk and cheese production.

There are no noise-related issues, but maneuvering vehicles, especially due to dust, could pose challenges. These challenges are not exclusive to the project, as issues may arise if someone from outside opens up grazing. Joint responsibility for the animals' food could pose security risks, but currently, there are no security concerns; interactions are familial or with acquaintances. There are currently no issues with employed workers. While there used to be dust-related issues, both machine noise and dust problems have decreased, resulting in diminished noises.

The results of in-depth, phone call interview consist of a female earthquake survivor. All outputs are presented in the form of citations.

Female / Housewife / 62 years old

Due to the discomfort, a conversation was held over the phone with an earthquake victim currently in Osmaniye. In the family, an individual diagnosed with Alzheimer's, upon observing damage to their home after the earthquake, expressed reluctance to stay in a container. The patient has struggled to adapt to the container living environment after the seismic event. Although not directly impacted by the earthquake, accommodation has become challenging at home, particularly after the aftershocks. There is a need for a structure with toilet and bathroom facilities. Except for the evening, there are not many issues reported.

3.1.2.2 Women

The outcomes and insights derived from the Mukhtar interview on October 23, 2023, regarding marginalized communities, encompassing Yoruks, women, individuals with disabilities, and earthquake survivors, are outlined in detail ESIA report. In relation to women, another insight from the interview indicates the absence of an organizational structure to facilitate their gathering for socialization in specific areas. As per the interview:

- There is an absence of organizational structures, such as associations or cooperatives, for women. They are not convened for bread-making, and there is no designated space or socialization area for them. They lack an environment where they can convene, although they have greatly benefited from public education. Some continue to engage in embroidery at home. Some of the households do not need additional income sources engaged by housewives' working.

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Considering the interview data, a suitable environment for a focus group study with women could not be identified. However, in interviews involving earthquake survivors and Yoruks, participants were intentionally chosen from the female demographic.

3.1.2.2.1 Gender Based Violence (GBV) and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

The Client and the contractors will provide the necessary trainings to the employees/workers before the recruitment process. These trainings will cover the awareness trainings including GBV and SEA/SH. Moreover, GBV and SEA/SH will be included and specified clearly in the Code of Conduct and compliance with the code of conduct rules will be in the written contracts of the personnel. The contracts will also indicate sanctions for non-compliance with the code of conduct.

The community is experiencing a higher flow of labor, which poses risks such as gender-based violence and harassment. Both aspects (increased labor influx and associated risks) are evaluated to risk concerning SEA/SH.

Grievances of GBV, SEA/SH will be handled and resolved by assuring anonymity and confidently through an unbiased approach since these types of grievances can result in a culture of silence.

The camp site to be established for the Project will meet the standards for worker accommodation prepared by International Finance Corporation (IFC) and separate facilities will be allocated for men and women in the workers' camps if required.

A Labor Management Plan will be prepared for the Project and the personnel will be trained on this Plan. The Labor Management Plan will put forth a policy including working conditions, fair treatment, non-discrimination, equal opportunity, vulnerable/disadvantaged workers, GBV, SEA/SH, prohibition of child labour and forced labour issues.

As a summary the steps to prevent GBV and SEA /SH risks;

- Enhancing consciousness and delivering information to internal stakeholders about workplace abuse and discrimination.
- Increasing awareness and communicating with all internal stakeholders regarding sexual harassment and gender-based discrimination in the workplace throughout both construction and operation phases.
- Educating and empowering all internal stakeholders about the principles of freedom of association and labor agreements throughout the all-project phases.
- Providing information and streamlining access to the project management for all internal stakeholders throughout the all-project phases.
- Moreover, when dealing with Investment Project Financing that includes significant civil works, it is crucial to engage in consultations with communities near the project site at various stages of the project. These ongoing discussions should provide chances to disseminate information about risks associated with the project and the corresponding response strategies, with particular emphasis on women, children, and other vulnerable groups that may necessitate tailored approaches to ensure a secure environment for dialogue.

GBV and SEA/SH are substantial risks for any project that interacts with a local community. In order to minimize the GBV and SEA/SH related risks, following mitigation measures will be taken during the implementation of the project:

- Sensitization of the Contractor and the personnel on GBV and SEA/SH issues will be provided.
- Awareness meetings will be conducted with the affected communities.
- Awareness-raising trainings including GBV and SEA/SH will be provided to all project workers.

- All project workers will be informed about the Code of Conduct in their written contracts.
- A functional and effective GRM will be implemented to provide a sensitive approach to the GBV and SEA/SH related complaints.
- Security personnel will be trained in proper communication methods with employees and the community.

3.1.3 Other Interested Parties

Other persons or communities associated with the project are defined as “other interested parties”. National and local government institutions and organizations (MoEUCC, Hatay Provincial Directorate of Environment, Urbanization and Climate Change, Erzin Municipality, etc.) are accepted as other interested parties of the project.

3.1.4 Stakeholder Matrix

According to the AIIB's Environmental and Social Framework (ESF) , stakeholders can have specific needs to appropriate conditions for participation to engagement process. These conditions vary in accordance with stakeholder’s limitations caused by transportation, health, education, social, economic, language and cultural situations. As a result, these limitations can determine specific communication techniques. The following stakeholder matrix has been organized in line with the project stakeholder needs.

In order to ensure equal and fair stakeholder participation, stakeholders should be identified at the first stage of the activity. It is also important to determine which consultation strategy (directly or indirectly) will be implemented for each affected group. Following Table 3.1 summarizes these details regarding the consultation and disclosure process.

Table 3.1. Stakeholder Matrix

Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method	Specific Needs (accessibility, large print, child care, daytime meetings)
National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Hatay Provincial Directorate of Environment, Urbanization and Climate Change, Erzin Municipality etc.)	Other Interested Party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Current developments about the project 	<ul style="list-style-type: none"> • Public Information and Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism 	<ul style="list-style-type: none"> • By holding special meetings for disabled people within the relevant institutions, they should also be included into disclosure processes, if any
Yukarıburnaz Neighborhood and Hürriyet Neighborhood	Project Affected Party	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Information about land acquisition process 	<ul style="list-style-type: none"> • Consultation meetings • Socio-economic research • Brochures and posters to be hung in public places (cafe, headman's building, town hall, etc.) • Project brochures • Presentations 	<ul style="list-style-type: none"> • The written documents can be reproduced in more visual formats for expanding acknowledgment level among illiterates residents, if any. • The printed documents can be delivered not only

Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method	Specific Needs (accessibility, large print, child care, daytime meetings)
		<ul style="list-style-type: none"> • Current developments about the project • Grievance Mechanism Procedure 	<ul style="list-style-type: none"> • Grievance Mechanism • Free hotline 	<p>male-dominated area both also common areas for females such as village oven.</p> <ul style="list-style-type: none"> • In comparison with identity of majority, the less common mother languages can be included to printed documents. Besides, specific meeting can be organized for minorities in different languages.
PAPs that may be disadvantaged or vulnerable (e.g. elderly, disabled, women, etc.)	Project Affected Party	<ul style="list-style-type: none"> • Information about the land acquisition process and its effects and entitlements. • Grievance Mechanism Procedure • Current developments about the project • Non-technical summary of the project 	<ul style="list-style-type: none"> • Consultation meetings • Socio-economic research • Focus group discussions • Project brochures • Presentations • Grievance Mechanism • Free hotline 	<ul style="list-style-type: none"> • By holding special meetings for disabled people among the residents, they should also be included into disclosure processes, if any
Employees of the Project and contractors	Project Affected Party	<ul style="list-style-type: none"> • Grievance Mechanism Procedure for project and contractor employees • Current developments about the project • Code of Conduct for Employees 	<ul style="list-style-type: none"> • Occupational safety meeting • Brochures and posters to be hung in work areas • Presentations • Grievance Mechanism • Free hotline 	<ul style="list-style-type: none"> • Internal grievance mechanism should cover worker-based procedures and implementation. • In-house trainings should include not only occupation-based worker but also all project staff including subcontractors.
Universities and Non-Governmental Organizations	Project Interested Party	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure 	<ul style="list-style-type: none"> • Consultation meetings • Periodic information activities 	<ul style="list-style-type: none"> • The announcement should frequently be repeated on different information source such as official website and official social media platforms to catch interested groups
Media	Project Interested Party	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity 	<ul style="list-style-type: none"> • Press conferences and meetings • Press release communications • Interviews 	<ul style="list-style-type: none"> • The announcement should frequently be repeated on different information source such as official website and official social media platforms to catch interested groups

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Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method	Specific Needs (accessibility, large print, child care, daytime meetings)
		<ul style="list-style-type: none"> Grievance Mechanism Procedure 		

3.1.5 Brief Summary of Previous Stakeholder Engagement Activities

Within the scope of the project environmental impact assessment studies, the stakeholders affected by the Project and related to the project were determined and negotiations were started with the stakeholders. At the first stage, public authorities were consulted for EIA studies.

A summary of previous engagement activities for the project is provided in Table 3.2.

Table 3.2. Summary of Previous Engagement Activities

Subject of the Meeting	Date	Place	Participants	The Scope of the Engagement
Site Investigation and Land Survey	18/07/2022	Hatay Province, Erzin District Project Area	<ul style="list-style-type: none"> ÇINAR 	<ul style="list-style-type: none"> Examination of the suitability of the project site Checking whether there is any construction work before the EIA studies Examining whether there are fields such as agricultural land, residences, and highways near the project area.
Public Disclosure and Process Engagement Meeting	23/09/2022	Hatay Province Erzin District Yukarıburnaz Wedding Hall	<ul style="list-style-type: none"> Hatay Governorship, Provincial Directorate of Environment, Urbanization and Climate Change Hürriyet Neighborhood Headman and residents Headman and residents of Yukarıburnaz Neighborhood ÇINAR İC İÇTAŞ 	<ul style="list-style-type: none"> To inform the public about the investment and to receive their opinions and suggestions regarding the project.
Social Impact Assessment and Surveys	29/09/2022-30/09/2022	Hatay Province Erzin District Yukarıburnaz Neighborhood and Hürriyet Neighborhood	<ul style="list-style-type: none"> Headmen and Households 	<ul style="list-style-type: none"> Assessment the socio-economic characteristics of the households To learn the thoughts and expectations of the local people about the project. Assessment the social impacts of the project

There are a total of 1,430 households in the Hürriyet Neighborhood and Yukarıburnaz Neighborhood, which are the closest settlements to the project area, and a total of 399 households were sampled with a total reliability level of 95% and a margin of error of ± 0.05 .

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The field survey, mukhtar interviews and in-depth interviews were conducted between 29.09.2022 and 30.09.2022, on the nearest settlement unit to the project area is Leçe Locality, which is close to the Hürriyet Neighborhood and Yukarıburnaz Neighborhood. By going to the settlement remaining in the project area, face-to-face meetings were held with the households.

Most of the households interviewed stated that they would like to be informed about the developments about the project. Due to the fact that there are concerns about the negative impact of the project on the environment, forests and agricultural activities, this information request of the local people should definitely be fulfilled.

The main source of livelihood of the neighborhoods remaining within the area of influence is the pension. Later, trade/ artisan incomes occupy an important place in agriculture and animal husbandry livelihoods.

The first of the most important problems for the settlements was expressed as unsuitable conditions of the inner roads. The second most important problem is stated as the lack of infrastructure. Telecommunication/communication problems are mentioned as the third most important problem.

56% of the participants had information about the Project. Nearly 70% of the interviewed household had positive opinions on the Project. Most of the sources of positive opinions (over 67%) can be listed as "it can be support to development of the region" and "decline on electricity / energy cost".

Over 70% of the attendances wanted to inform about the Project and the main informant channels had been preferred as headmen, responsible staff of state organizations and owner of the Project.

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4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Information Disclosure

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the life of the Project. The project owner will be in active communication with identified stakeholders throughout the life of the project. In particular, the Project owner will demand feedback from stakeholders on the environmental and social performance of the project and the implementation of the identified mitigation measures. If there are significant changes in the project resulting in additional risks and impacts, particularly where they will affect project affected parties, the Project owner will provide information on these risks and impacts and consult with project affected parties on how to mitigate these risks and impacts.

After the approval of final ESIA disclosure package will be disclosed on the Project's website. It should be noted that this specific website has been established as a part of stakeholder engagement implementation and grievance mechanism. The relevant information on the disclosure channel is given in below including the Project specific website:

IC ENTERRA RENEWABLE ENERGY

Project Website : <https://www.icenterra.com.tr/gunes-santralleri/hatay-erzin-ges>

Grievance mechanism webpage: <https://www.icenterra.com.tr/bize-ulasin>

Physical address : Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20
Çankaya / Ankara

E-mail address : bilgi@icenterra.com.tr

Phone number : +90 312 285 83 63

4.2 Engagement Activities

At which stage of the project which stakeholder engagement activity will be carried out and which methods will be used are detailed in Table 4.1 and Table 4.2, respectively.

Table 4.1. Stakeholder Engagement during Baseline Data Collection

Engagement Method	Location (If Applicable)	Stakeholder Groups
Consultancy meetings	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Socio-economic studies	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Project brochures	Districts and settlements within the project boundaries	All
Grievance mechanism	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Hotline	Non-applicable	All
Corporate website	Non-applicable	All
Trainings	Non-applicable	Internal Stakeholders (Workers and Project Staff)

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Table 4.2. Stakeholder Engagement during Construction and Operation

Engagement Method	Location (If Applicable)	Stakeholder Groups	Information to be Shared	Frequency
Consultancy meetings	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Information about land acquisition process • Current developments about the project • Grievance Mechanism Procedure 	Once in six (6) months
In-depth interviews	Districts and settlements within the project boundaries	National and local government agencies and organizations, cooperatives, and other interested groups	<ul style="list-style-type: none"> • Public Information and Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism 	Once in six (6) months
Focus-Group Interviews	Project affected settlements	PAPs (vulnerable groups e.g. elderly people, people with disabilities, women etc.)	<ul style="list-style-type: none"> • Information about the land acquisition process and its effects and entitlements. • Grievance Mechanism Procedure • Current developments about the project • Non-technical summary of the project 	Once in six (6) months
Press releases	Non-applicable	Media	<ul style="list-style-type: none"> • Press conferences and meetings • Press release communications • Interviews 	Important dates of the project
Presentations	Districts and settlements within the project boundaries	All	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Information about land acquisition process • Current developments about the project • Grievance Mechanism Procedure 	Once in a year
Grievance mechanism	Focus on the construction site	All	Grievance Mechanism Procedure	As needed
Hotline	Non-applicable	All	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Information about land acquisition process • Current developments about the project • Grievance Mechanism Procedure 	As needed
Corporate website	Non-applicable	All	<ul style="list-style-type: none"> • Non-technical summary of the activity and Stakeholder Engagement Plan • Information about land acquisition process • Current developments about the project • Grievance Mechanism Procedure 	As needed
Trainings	Non-applicable	Internal Stakeholders (Workers and Project Staff)	<ul style="list-style-type: none"> • AIIB ESF • Labor Rights • On-the-Job training • Vocational trainings • Procedure and Policy of Human Resources • Prevention of Discrimination and Harassment Incidents in Workplaces • Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) • Prevention of Forced Labor, Child Labor and Modern Slavery 	As needed

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4.3 Training

The Instruction for the Implementation of Training Activities should include the following headings as a framework. The organization of all trainings is under the responsibility of IC İÇTAŞ. For example, in the case of Chance Find Procedure, all project employees, especially during the pre-construction period, should participate in this training. The person conducting the training may be within the IC İÇTAŞ organization as needed or external expertise may be sought. This situation is also applicable to the subject of biodiversity (see Table 4.3):

- In the last of each year, the “Training Request Form” is sent by the human resources chief to the unit managers for the preparation of the training plan for the next year and the training needs are requested.
- After the collection of the records, the Annual Training Plan is prepared.
- The Annual Training Plan is distributed to the relevant units and announced.
- After the organized trainings, the evaluation of the training effectiveness is made and submitted to the management with the “End of Year Training Activities Report”.
- The data obtained are kept by the human resources chief.

Table 4.3. Training Programs within Engagement Activities

Responsible Trainer	Issues
Administrative Affairs (IC İÇTAŞ)	AIIB ESF Project Management Management of Environmental and Social Risk Quality Systems Sustainable Development Data security
Human Resources (IC İÇTAŞ)	AIIB ESF Labor Rights On-the-Job training Vocational trainings Procedure and Policy of Human Resources Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) Prevention of Gender Based Violence and Harassment Prevention of Forced Labor, Child Labor and Modern Slavery
Occupational Health and Safety & Environment (IC İÇTAŞ and/or OHS Specialist of the Project)	AIIB ESF Occupational Health and Safety First Aid Emergency Preparedness and Emergency Response Waste and Wastewater Management Air Quality Management Noise Management Resource Efficiency Sustainable Resource Management
Community Liaison Officers (CLOs) Human Resources (IC İÇTAŞ and/or Social Responsible of the Project)	AIIB ESF Internal and External Grievance Mechanism (GM) Procedures SEP
Biodiversity specialist (to be out-sourced, if needed)	Biodiversity Conservation and Sustainable Management of Living Natural Resources
Archaeologist (to be out-sourced, if needed)	Cultural Heritage Management Plan Chance Find Procedure

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4.4 Engagement Activities

The tools and methods defined for stakeholder engagement have been diversified and expanded in order to enable all stakeholders to access the Project through the means of their choice and most convenient access.

Covid-19, which started in the first months of 2020 and whose effects are still ongoing, necessitated a planning that prioritizes safety and health in the stakeholder engagement process. For this reason, stakeholder engagement activities were carried out using appropriate methods in accordance with Covid-19 measures and restrictions.

The methods and tools of stakeholder engagement of the project are described below. First of all, the methods and tools that are suitable for the restrictions and measures in the Covid-19 process were explained, then the methods and tools that are recommended to be used when the new normalization process is started and when the conditions are suitable, or those require being together, were defined. The following methods and materials have been used within the scope of participation from the scoping phase of the project to the completion of the project.

Consultation Meetings: Consultation meetings were held when required during the project process. Stakeholders were given detailed information about the Project and their questions and opinions were evaluated. Consultation meetings will continue to be held as required during periods or issues that warrant the Project's consultation with stakeholders. In cases where consultation was required, consultations were held using online tools during the Covid-19 process, and stakeholder consultations were held face-to-face after the new normalization process, which is convenient conditions. In these meetings, the current developments of the project were explained, information was given about the resettlement / relocation process, and ideas and expectations were discussed during these processes.

In-Depth Interview: In-depth interviewing is a qualitative research technique that involves intensive individual interviews with a small number of participants to examine their perspectives on a particular idea, program or situation. In this case, interviews are conducted with national and local government agencies / organizations, cooperatives etc. to analyze the potential impacts of the Project on management and businesses and to evaluate their expectations/advice through planning. In-depth interviews were conducted with stakeholders. In-depth interviews were conducted in a way of face-to-face meetings, by taking into account the Covid-19 process.

Focus Group Interview: Focus group interviews were conducted when there was a need for data collection and qualitative fieldwork during the monitoring process. Focus group studies, which were held in a way of face-to-face meetings, were carried out face-to-face with the convenient conditions after the new normalization process, by taking into account the Covid-19 process. It is an effective way to bring people from similar experiences together to discuss a specific topic related to the project.

Socio-Economic Studies: Economic and social conditions affect each other positively or negatively. There is a direct connection between economic factors such as the livelihood of the society, income level, jobs and unemployment etc. with social life. Therefore, economic parameters determine social standards. Within the scope of the project, studies were carried out in order to conceive the socio-economic status of the stakeholder groups.

Survey Study: Survey studies were used for data collection during the Project process and were carried out in a way of face-to-face, taking into account the Covid-19 process, as conditions allow, after the new normalization process.

Presentations: Visual materials were also used during the informing phase of the stakeholders. Presentations containing summaries of written documents were made.

Project Brochure: At the first stage, brochures / flyers containing communication channels, announcements and information about the Project were left to the common public areas in the

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surrounding settlements, headmen, municipalities, provincial directorates and stakeholder professional chambers.

Grievance Mechanism: The Grievance Mechanism will be open to all stakeholders throughout the duration of the project, including recording grievances, taking action for resolution and closing grievances by providing necessary information.

Letter / mail: Project brochures, postings, reports or announcements can be sent by mail, courier or letter when necessary, so that stakeholder groups or individuals who do not have access to the Internet, smartphones, social media or e-mail can access Project information and be an effective part of the Stakeholder engagement process.

Hotline: There will be a hotline that all stakeholders can use to raise their concerns and complaints. This method is important in terms of solving the urgent problems of the stakeholders and being fast.

Corporate Website: The corporate website provides announcements, Project documents, reports and contact information for further information requests.

Covid-19 Conditions: The Covid-19 pandemic has affected the whole world and measures such as wearing masks and keeping social distance in society have become the new normal of our daily lives. If the Covid-19 pandemic conditions continue during the operation phase of the project and the implementation of this SEP, the stakeholder engagement plan and activities will be aligned and implemented in accordance with the guidelines of relevant and responsible national and international organizations such as World Health Organization (WHO), Republic of Türkiye Ministry of Health (MH) and MoEUCC.

Within the scope of SEP, face-to-face meetings were held in accordance with the mask and social distance rules of the MH and WHO. In cases where face-to-face meeting is not possible due to Covid-19 conditions, online interview methods can also be used. In addition, it was ensured that the meetings to be held in open spaces in accordance with social distance and other regulations of the MH and WHO.

Apart from these measures, other practices mentioned in the “Interim Recommendation to IFC Clients on Secure Stakeholder Engagement in the Context of Covid-19” can also be used in the planning of stakeholder engagement activities.

All the submission should be recorded through a Grievance Log Document. A sample form is given with Appendix-4 Grievance Log Sample. Firstly, all submission should be categorized as feedback, question, concern, grievance and complaint. Secondly, the submission should be also categorized according to their scope such as environment, community health and safety, security, project related risks etc. In addition, all the records should have a registration date and due date to track mandatory legal response process. Especially, required actions to be taken and closure time should be included to grievances registration and the relevant data have to be easily accessed by assigned staff and the other reviewer.

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5. GRIEVANCE MECHANISM

5.1 Objective and Scope

The basic principles of the grievance mechanism related to the project:

- Ensuring impartiality, confidentiality, free from coercion and threats
- Ensuring that people have concerns specified in this SEP is assured within the timeframes
- Providing a clear, transparent, culturally appropriate and accessible consultation process
- Provide the option to complain and provide feedback anonymously, especially for SEA/SH related submission.
- The grievances related to both community health and safety and environmental risk can be urgent due to the accidents, communicable disease and pollution. Thus, immediate actions have to be taken to solve and/or prevent further damages.
- Provide access without cost and risk of retaliation to the person who raises the concern
- Not blocking access to judicial and administrative remedies

IC İÇTAŞ does not have any mechanism to manage the Opinions, Complaints, Suggestions and Evaluations. The grievance mechanism to be proposed will include the evaluation and recording of all internal and external complaints as a result of all activities of IC İÇTAŞ. Within the scope of the G4-Erzin-2 SPP Project, a separate grievance mechanism described below will be implemented.

The rights of the complainant are not limited to objection to the results of the complaints process, but also include:

- The complainant does not have to be involved in the complaint and feedback mechanism and may prefer to resort to other judicial, administrative and legal remedies. Judicial or administrative remedies will be applied in accordance with the Constitution of the Republic of Turkey and the relevant legislation.
- The complainant cannot be compelled to be involved in the complaint management process.
- The complainant can stop participating in the Project grievance mechanism at any time and choose to proceed other legal remedies.

IC İÇTAŞ responds to applicants within 15 days by evaluating the application in accordance with the law. However, in cases where the requested information or document is obtained from another unit from IC İÇTAŞ, access to the information or document is made within 30 working days, then the opinion of another institution or organization is requested about the application, or the content of the application is related to more than one institution. In this case, the extension of the response period and the reason for this is notified to the applicant before the expiry of 15 working days. The answers to the applications are notified to the applicant in writing via electronic or fax. If necessary, they are also informed by phone.

In accordance with mentioned objectives and scope, Project specific Grievance Redress Mechanism (GRM) will be the main way to present any kind of submission. The process of GRM will be conducted by key staff as social specialists and CLOs. The fundamental responsibility of the CLOs is to collect submission delivered by stakeholders on field. In case of gender-sensitive condition a female CLO will be assigned to enable more comfortable relation with local female people. Both male and female CLO will be accessible in local area during the pre-construction and construction period. Their exact location will be a Public Relation (PR) Office, which will located in as accessible as near to the settlements. Besides, CLOs will be mobile to access vulnerable groups and in case of viewing. The address of PR Office and communication information of CLOs will be announced in common areas. As a

summary, primary interactions will be conducted by CLOs on field, while the other recommended communication methods will also be accessible. In any case of language based handicaps, CLOs should be able to use local languages such as Arabic due to refugees population located in the region. There is a significant role of CLOs, which is to remind complainants existing of legal application process without Project specific GRM. If the complainants would prefer to apply legal institutions such as courts, CLOs will guide complainants until to solve relevant grievance.

The other application way will be given both for citizen and foreign population in below as CIMER and YIMER.

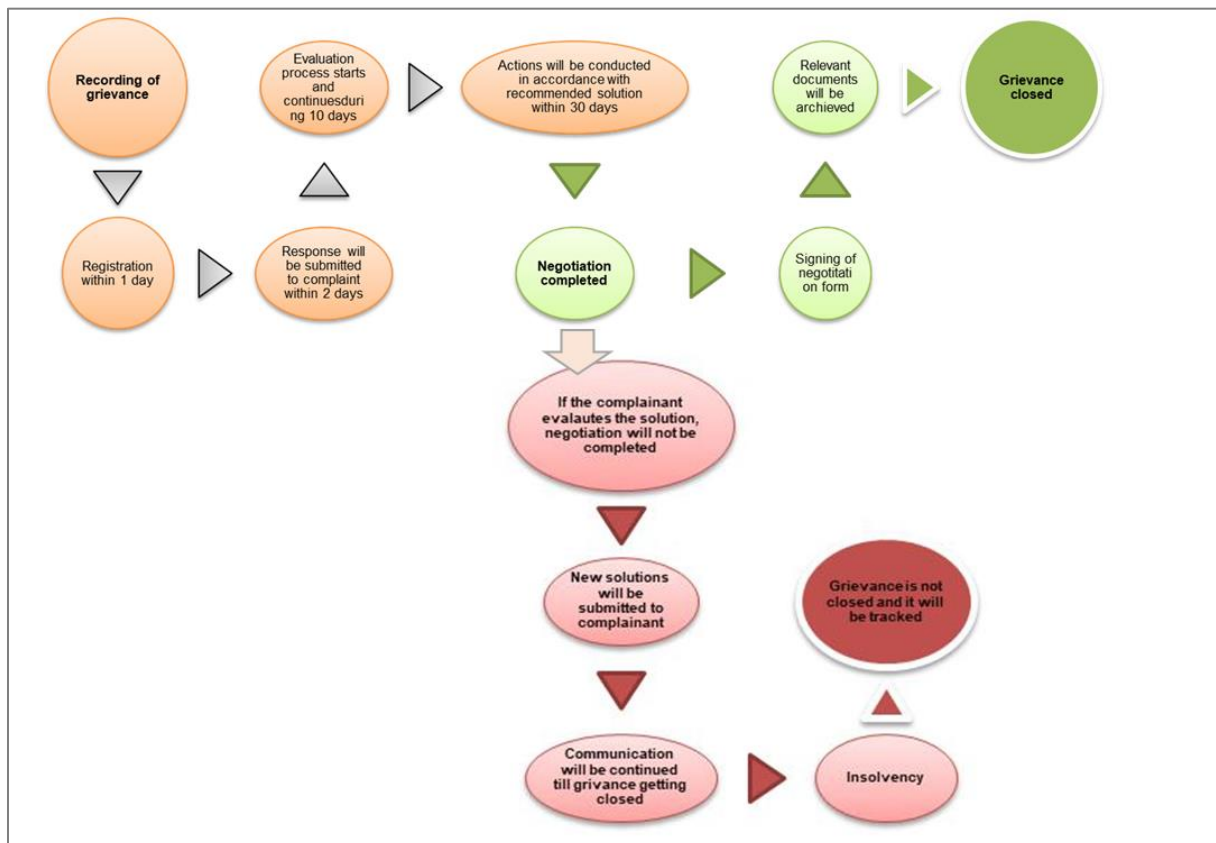


Figure 5.1: GRM Flowchart

Presidency’s Communication Center (CIMER)

Presidency’s Communication Center (CIMER) is the line established for all kinds of problems, complaints and requests of citizens. The CIMER system has been actively used by citizens since its establishment.

CIMER is used through a software program and a web page developed by the Presidential Department of Communications. By keeping the communication channels between citizens and the state open, CIMER ensures that applications can be made anytime and anywhere.

Alongside the GM at the Project level, the CIMER system will also be used to receive and respond to complaints from Project affected or other interested parties. According to the Right to Information Act, every person has the right to obtain information within the framework of the procedures and principles determined by written rules. This application can be made in writing by using the Right to Petition or online at <https://www.icisleri.gov.tr/bilgi-edinme>.

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CIMER system enables stakeholders to communicate directly with IC İÇTAŞ, however, a separate system will be established for the project where stakeholders can receive their answers locally and submit their complaints. This local Grievance system will be established within IC İÇTAŞ, will be implemented and monitored by both IC İÇTAŞ and the Contractor during the construction and operation phases, will be more easily accessible for stakeholders and will encourage them to voice their complaints.

Foreigners Communication Center (YİMER)

Republic of Turkey Ministry of Interior Presidency of Migration Management is always ready to assist those who want to receive accurate, fast and reliable information in accordance with the legislation 24 hours a day, 7 days a week via YİMER 157 and other service channels.

Alo 157, which started its activities as an Emergency Communication Line for Human Trafficking Victims in 2003, was taken over by the Presidency of Migration Management in 2014 and its service network was expanded, and started to serve under the name of Foreigners Communication Center (YİMER) as of 20 August 2015.

During the establishment period YİMER 157 was giving service in 4 languages including Turkish, English, Arabic and Russian; as of 1 April 2016 with the addition of German and Persian in 6 languages, as of 1 January 2020 with the addition of Pashto in 7 languages (Turkish, English, Arabic, Russian, Persian, German and Pashto), non-stop service is provided to foreigners 7 days 24 hours. YİMER 157, where foreigners can find answers to all questions they ask about issues such as visa, residence permit, international protection and temporary protection, provides life-saving service for the foreigners who victims of migrant smuggling at sea are for 7 days 24 hours uninterrupted service for the identification of victims of human trafficking and rescue operations. YİMER 157, which can be accessed within the country and abroad for "accurate, fast and reliable information", aims to be the first address for foreigners' questions and problems.

5.2 Roles and Responsibilities

The stakeholder engagement program will be in frequent coordination with the Project owner and their Contractors to ensure understanding and adoption. The Contractors will report to the Project owner according to the terms of the individual contracts. The project owner will ensure the quality and consistency of the reports and on-site implementation activities.

The Project-level organizational structure both for construction and operation phase are given in the following Figure 2 and Figure 3.

As seen in the figures, the management will be based at the Headquarters Environmental and Social Management unit, however there will be personnel assigned for the E&S and OHS issues at the project site.

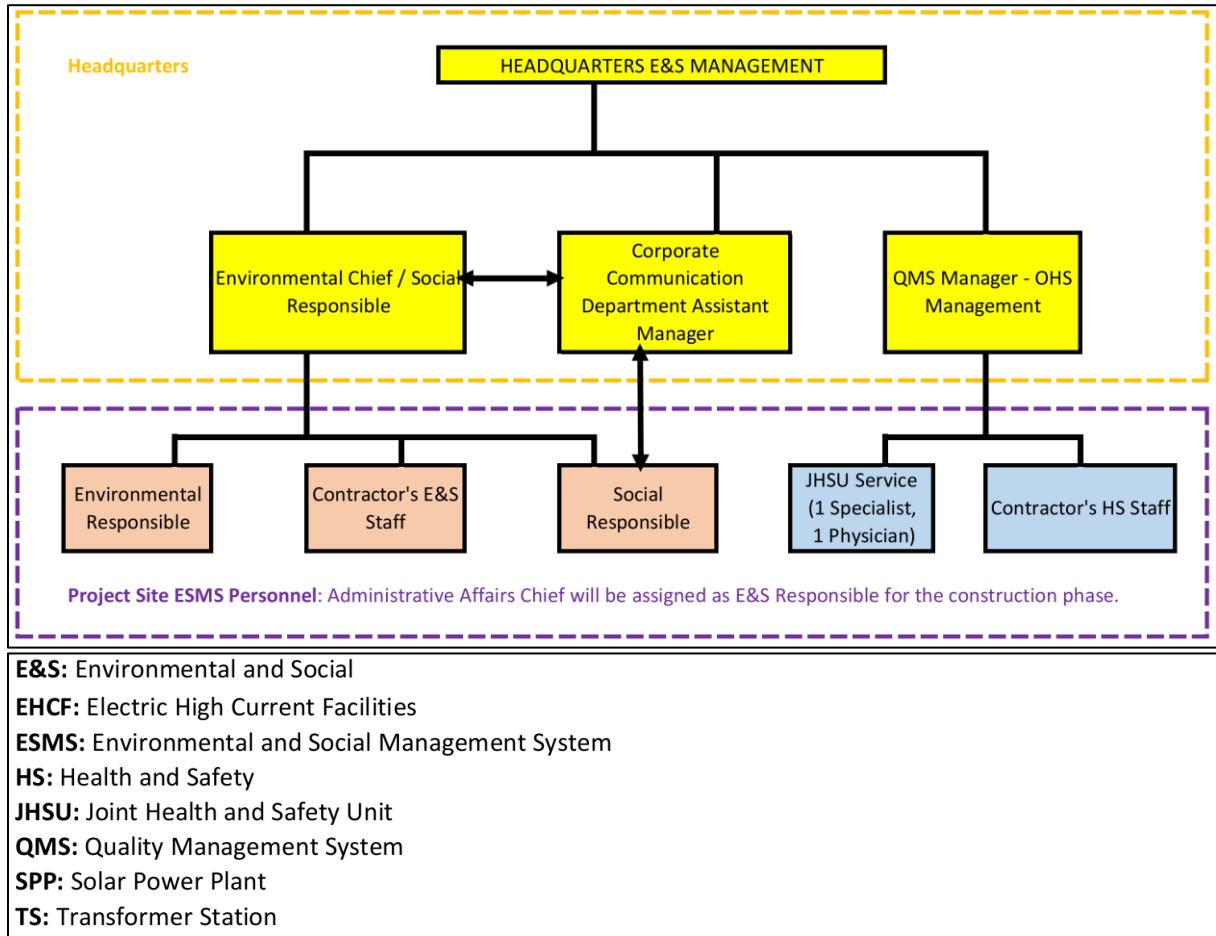
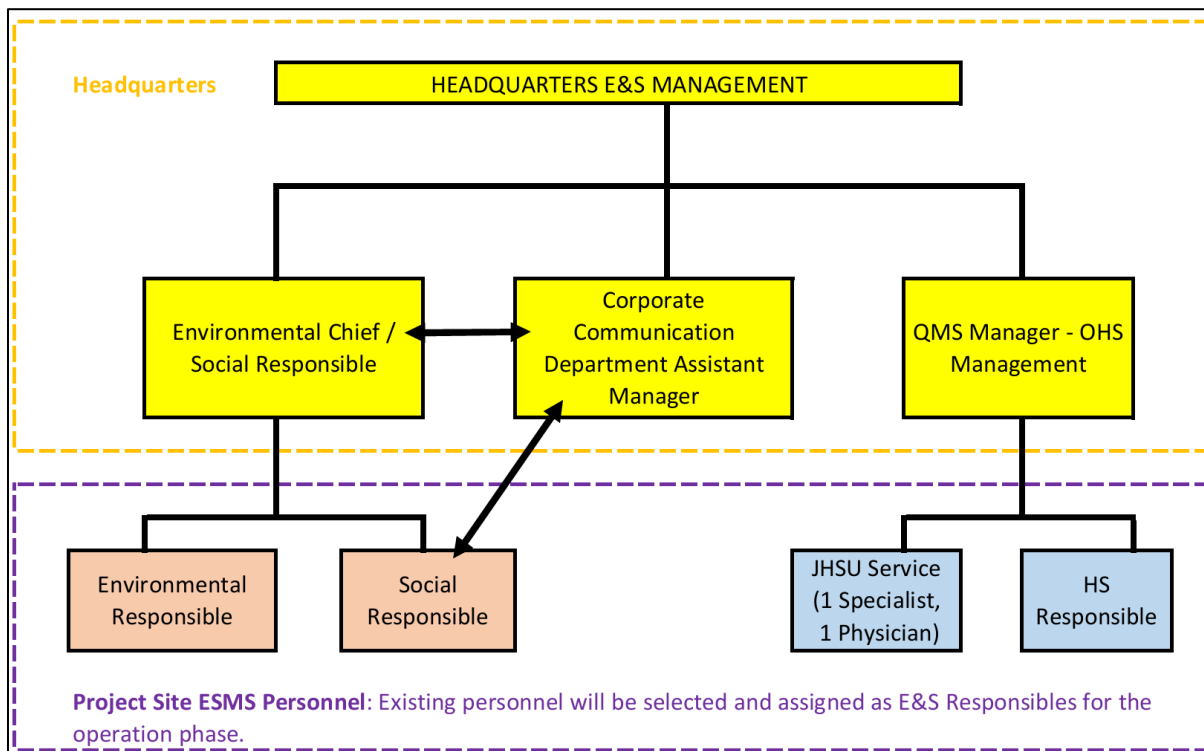


Figure 2. Organizational Chart for the Implementation of Management Plans during Construction Phase



E&S: Environmental and Social
EHCF: Electric High Current Facilities
ESMS: Environmental and Social Management System
HS: Health and Safety
JHSU: Joint Health and Safety Unit
QMS: Quality Management System
SPP: Solar Power Plant
TS: Transformer Station

Figure 3. Organizational Chart for the Implementation of Management Plans during Operation Phase

Headquarters Environmental Health and Safety (EHS) Team

- Formed by Environmental Chief/Social Responsible, Corporate Communication Department Assistant Manager and QMS Manager/OHS Management.
- Owner and confirmatory of this plan,
- Ensures provision of adequate resources for implementation of this plan, and
- Controls and confirms implementation of this plan at a corporate managerial level.
- Implements this Plan and updates it whenever necessary,
- Ensures Facility operations are carried out in accordance with this Plan's requirements,
- Ensures realization of waste management related internal audits / controls, identification of possible shortcomings / non-compliances, and implementation of relevant corrective actions,
- Controls and audits the compliance of subcontractors and service providers to this Plan's requirements,
- Keeps all kinds of records relevant to this Plan,
- Follows legislative requirements applicable to this Plan,
- Ensures realization of monitoring requirements of this Plan,
- Provides and/or arrange provision of trainings within the scope of this Plan.

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Headquarters Environmental Chief / Social Responsible

According to the management organizations of the construction and operation phase of the Project, project-site Environmental Responsible directly reports to Environmental Chief / Social Responsible. The Environmental Team consists of which is practically responsible for environmental issues including waste management, and which comprises individuals such as Project site Environmental Responsible (and Contractor E&S Staff for the construction phase), which are the coordination with the Environmental Chief / Social Responsible. Therefore, as a lead of the Environment Team, the roles and responsibilities of the Environmental Chief / Social Responsible are listed below:

- In collaboration with the project-site Environmental Responsible (and Contractor's E&S Staff for the construction phase), provides adequate resources for implementation of this plan,
- Ensures implementation of this Plan in accordance with Project Standards,
- Ensures provision of relevant trainings within the scope of this plan,
- Ensures review and update of this plan as required, and
- Ensures compliance of subcontractors and service providers to this Plan's requirements.

Social Team

Social team consists of Environmental Chief / Social Responsible, Corporate Communication Department Assistant Manager at the Headquarters, and Project-site Social Responsible (and Contractor's E&S Staff for the construction phase), and their main duties are as follows:

- Manages and implements the social issues indicated in this Plan,
- Manages the grievance mechanism,
- Keeps records relating to grievances received and their resolution,
- Conducts regular inspections of grievance mechanism,
- Reports to the Headquarters E&S Management on the performance of the implementation of the social aspects of this Plan.

Project Site Environmental and Social Management System Personnel

- Project site ESMS personnel consists of Environmental Responsible, Social Responsible (and Contractor's E&S Staff for the construction phase) for the environmental and social implementation of the plan; and it includes JHSU Service for Occupational Physician and Occupational Safety Specialist (as well as Contractor's HS Staff during the construction phase) for the OHS issues.
- Project site ESMS personnel are responsible for the site-based implementation of the tasks in the plan, for which they have been assigned to perform.
- Project site ESMS personnel are responsible for reporting the Project site's environmental, social and health and safety performance, incidents, accidents, etc. to the relevant chief/manager at the Headquarters E&S Management unit.

Employees

- Responsible for complying with and implementing the requirements of this plan.
- Responsible for participating in relevant trainings designated for them in this plan.
- Responsible for complying with all measures and rules listed under the Emergency Action Plan.
- Responsible for reporting nonconformities.

Contractors, Subcontractors and Suppliers

- Responsible for complying with all requirements set out in this plan in accordance with the terms of the contract.
- Responsible for implementing this Labor Management Plan and its provisions.

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- Responsible for allocating resources from its own body for the effective execution of this plan.
- Responsible for reporting any nonconformity with the plan to the EHS Team.

5.3 Procedures and Responsibilities

Recording and monitoring complaints (including environmental issues) will be the main responsibilities of IC İÇTAŞ. IC İÇTAŞ will appoint personnel for the grievance management process in the field. As described in the Resources and Responsibilities, the Project Manager and Social Specialist will be primarily responsible for grievance management and the Contractors' social staff. IC İÇTAŞ will arrange contractual agreements with the Contractor to ensure that they have a Community Liaison Officer (CLO) on site that will be responsible for recording and monitoring grievances with the Contractor. These appointed persons will follow the Grievance Mechanism established to record and resolve all grievances from stakeholders and to continue on the reparative measures established. Contact information will be provided through public information meetings, Project brochures and the Project website to raise awareness and provide transparency on how stakeholders can raise their grievances. Some ways for stakeholders to formally voice their grievances are as follows:

- Hotline: (Stakeholders can call the relevant unit of IC İÇTAŞ directly) *To be determined later*
- Email: (Complaints can be sent via email to email addresses) *To be determined later*
- Face-to-face: (PAPs can convey their complaints to the relevant field personnel of IC İÇTAŞ or the Contractor)
- Complaint Registration Form: (They can fill in the Complaint registration forms that will be available at the construction site and in public areas accessible to all stakeholders)

The steps to be followed during complaint management will be as follows;

5.3.1 Receiving and Registering the Grievance

- All grievances received from both internal stakeholders as Project Personnel at all levels, contractors and subcontractors of the Project and all external stakeholder groups, through the toll-free hotline, e-mail or other channels are recorded using the Complaint Register Form (CRF) and a hard copy of the form is given to the Complainant. The completed form is delivered to IC İÇTAŞ Social Specialist / Contractor's CLO within the same Business Day.
- If CRF cannot be filled, the following basic information is recorded and delivered by IC İÇTAŞ Social Specialist / Contractor's CLO via email or acceptable correspondence:
 - Complainant's first and last name (complainants have the right to leave an anonymous complaint record);
 - Subject of the complaint;
 - Complaints Place;
 - Contact information (phone / mobile number, address, e-mail, etc.);
 - Organization name (if relevant)
 - Date and time
 - Anonymous section
- Project's Social Team members (see Chapter 3) completes the CRF according to the information provided and registers the Complaint.
- All reparative actions suggested by the complainant are recorded through the CRF.
- Complaint Monitoring Table is filled by Project's Social Team members (see Chapter 3) according to the information received

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- All the components of the mechanism should give chance for anonymous registration. For instance, it could be provided by location of the complaint boxes which could not be monitored any camera system.

5.3.2 Evaluation of the Grievance

- All Complaints are reviewed to classify whether they are genuine and relevant to Project activities. If the issues/disputes raised are not relevant to the Project, guidance is provided to the Complainant to contact the relevant person. Eligible Complaints are responded to according to Project social and environmental requirements as defined in the EIA.
- All Complaints, direct phone calls, e-mails, face-to-face meetings / communications received over the toll-free phone are recorded and Project's Social Team members (see Chapter 3) will contact the complainant to explain the Project response time within two (2) Business Days after registration.
-
- IC İÇTAŞ Solar Energy / Contractor has ten (10) Business Days to investigate and respond to Complaints. If the situation requires a more complex investigation, the Complainant will be provided with updated information describing the necessary actions and possible timeline for resolving the Grievance.
- Responses consistent with the Project's social mitigation measures and compensation items are predefined according to Project standards (see Appendix-2 Complaint Register Form).

5.3.3 Solution of the Grievance

- Necessary reparative actions will satisfy the complainant.
- All parties agree on reparative actions during the resolution process.
- IC İÇTAŞ / Contractor aims to resolve each complaint within thirty (30) Business Days after responding.
- Complainants can apply to the relevant court when they are not satisfied with the decision of IC İÇTAŞ / Contractor regarding their complaints (see Appendix-2 Complaint Register Form).

The utilization of both the IFC PSs and the AIIB ESSs in assessing environmental and social impacts ensures a comprehensive and globally recognized framework for sustainable project development. While the IFC PSs provide a well-established and widely accepted benchmark, the AIIB ESSs offer region-specific considerations, enhancing the assessment's adaptability to local contexts. This dual approach allows for a thorough identification and mitigation of potential risks, promotes stakeholder engagement, aligns with international best practices, and underscores a commitment to achieving high environmental and social standards, thereby contributing to more responsible and sustainable project outcomes. Therefore, creditors, which are TSKB and AIIB, require the implementation of IFC PSs along with the AIIB ESSs.

The details of the AIIB's Independent Accountability are given under section 5.5.

5.3.4 Closing of the Grievance

Evidence of the reparative actions taken (photographs or other evidence documents on the Site, belonging to the subject) is collected and a "Grievance Closure Protocol" is signed by IC İÇTAŞ / Contractor and the Complainant (see Appendix-3 Complaint Closure Form).

If the grievance cannot be closed although all corrective actions, an appointed Appeal Committee will re-evaluate to unresolved applications prior to constitution of GRM.

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5.4 Worker's Grievance Mechanism

IC İÇTAŞ / Contractors aims to establish processes and responsibilities for the handling and monitoring of grievances received from employees, including subcontractors. IC İÇTAŞ /undertakes to comply with the following objectives of the contractors:

- Regarding the working conditions for all employees, including the employees of subcontractors to provide a mechanism for expressing opinions, concerns and complaints.
- To ensure to prevent the recurrence of grievance related to the same issues.
- An active and transparent relationship with workers aimed at resolving concerns in the early stages of the dispute setup.

IC İÇTAŞ / Contractor aim to establish processes and responsibilities for the handling and monitoring of Complaints received from workers, including contract workers. IC İÇTAŞ / Contractor undertake to comply with the following objectives:

- To provide a mechanism for all employees, including subcontractors' workers, to voice themselves heard concerns and grievances regarding working conditions.
- To prevent recurrence of complaints about the same issues
- Establishing an active and transparent relationship with workers aimed at resolving concerns in the early stages of the conflict.

IC İÇTAŞ / Contractor will implement the Workers Grievance Mechanism to provide workers with an opportunity to voice their concerns and Grievances. During the on-the-job training, information will be given to the workers on how to make a complaint, suggestion and Grievance forms will be provided in the sites used by the workers in the construction camp, such as the social units and the food court. A Grievance table will be created to document all employee Grievances, corrective actions and results. Complaints of all employees will be recorded in this grievance table, which will be used to record, monitor, report and evaluate all Complaints including third parties, employees and contract workers and their responses.

IC İÇTAŞ / Contractor CLO will listen to Complaints made by workers and subcontractor workers; then, will act in cooperation with the relevant units to resolve them and cooperate with the Social Specialist / CLO to record the Grievance in the Grievance registration table. IC İÇTAŞ / Contractor workers will be provided with a grievance box where the request, concern and Complaint form and the completed forms can be left in the areas used by the workers in areas such as social units and food court in the construction camp; The Social Specialist / CLO will take down the date, time, source, location and nature of each request in the Complaint forms, suggestions and Complaints when received from CLO officers.

5.5 AIIB's Independent Accountability Mechanism

The bank mandates the client to establish a project-level grievance mechanism in line with the Environmental and Social Policy (ESP) and relevant Environmental and Social Standards (ESSs). This mechanism is intended to address concerns or complaints from individuals who believe they have been adversely affected by the environmental or social impacts of the project. Scaled to the project's risks and impacts, the grievance mechanism may utilize existing formal or informal mechanisms, provided that those existing mechanisms meet the bank's standards, and they can be supplemented with project-specific arrangements if necessary. The mechanism is designed to promptly address concerns using a transparent, gender-sensitive, and culturally appropriate process accessible to all affected individuals. It includes

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provisions for protecting complainants from retaliation and allowing anonymity if requested. The mechanism also requires the maintenance of a publicly accessible case register, and reports on grievance redress and outcomes, disclosed in accordance with applicable ESS. If the project is in the private sector, the bank also mandates the establishment of a grievance mechanism for workers to address workplace concerns.

The Project Affected People's Mechanism (PPM) is established to address concerns of individuals or communities adversely affected by AIIB-financed projects. The PPM includes functions such as handling project processing queries, dispute resolution, and compliance reviews. The document specifies the eligibility criteria, time limits for filing submissions, and the procedures for processing submissions. It also covers confidentiality, the risk of retaliation, co-financing, disclosure of information, periodic reporting to the Board of Directors, and provisions for review and updates to the policy. The PPM aims to enhance AIIB's accountability in managing environmental and social risks associated with its projects¹. The PPM allows an independent review for submissions from Project-affected people who believe AIIB's failure to implement the ESP adversely affects them. It enhances AIIB's accountability through three functions: handling project queries, facilitating dispute resolution, and conducting compliance reviews to address environmental and social impacts during project phases².

The PPM discloses information according to AIIB's Public Information Policy. Documents related to submissions, including acknowledgments and eligibility reports, are published on the PPM website unless confidentiality is requested. Additional information, such as actions taken for Project Processing Queries, Dispute Resolution agreements (if disclosed), and Compliance Review details, including Board decisions, Terms of Reference, Final Compliance Review reports, Management's responses, approved Management Action Plans (MAPs), and periodic status reports, is also disclosed in line with specified timelines³.

The AIIB, a multilateral development bank, has already established an independent Compliance, Effectiveness, and Integrity Unit (CEIU) to oversee its operations and handle complaints. The proposed Complaints Handling Mechanism aims to address concerns related to AIIB's non-compliance with environmental and social safeguards. The CEIU is seeking input from stakeholders to shape the mechanism's development. The consultation process involves two phases, including video conferences and written submissions. The document also includes suggested questions for stakeholders to provide input on the proposed mechanism's efficiency, effectiveness, and its potential role in addressing systemic issues and facilitating organizational learning⁴.

¹ https://www.aiib.org/en/policies-strategies/_download/project-affected/PPM-policy.pdf

² <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/rules/index-part2.html>

³ <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/rules/index-part8.html>

⁴ <https://www.aiib.org/en/policies-strategies/operational-policies/complaint-mechanism.html>

6. MONITORING

The project owner will track the GRM process on a systematic basis the feedbacks they receive from communities, local governments, landowners, other companies, NGOs, Media, academic institutions and other interest groups through an effective consultation and Grievance Mechanism.

If necessary, a summary of all stakeholder engagement activities, including the tracing of grievances, will be submitted to the relevant agency

The project owner will maintain communication channels with relevant stakeholders as determined. Other identified additional stakeholders will be added to the stakeholder list and communication will be initiated with them. In the event of significant changes or updates to the Project, environmental and social issues will continue to be addressed and communicated to stakeholders. Improvements, upgrades and all environmental and social issues will be communicated in a timely manner through the methods outlined in Chapter 4 of this SEP.

The SEP will be updated periodically and whenever major project changes occur. Updates will provide brief summaries of issues, concerns, and questions that rose during the previous year, and also information on any changes between planned and non-planned activities or events.

The GRM monitoring are given in Table 6.1 to illustrate key performance indicators (KPIs) and responsible parts.

Table 6.1. Key Performance Indicators for GRM

KPIs	Actions	Part	Project Phase	Responsible Staff
Ensure to implementation of Project specific GRM	Institution of Project Implementation Unit (PIU)	Contractor	Prior to Land Preparation	Contractor
	Constitution of Project specific internal GRM	Contractor Subcontractor	Prior to Land Preparation	PIU Social Specialist HR specialist
	Constitution of Project specific Worker's GRM	Contractor Subcontractor	Prior to Land Preparation	PIU Social Specialist HR specialist Labor force specialist OHS specialist
	Preparation of complaint forms	Contractor	Prior to Land Preparation	Social Specialist
	Evaluation of registration in internal GRM and Worker's GRM	Contractor	During Project life cycle	Social Specialist
	Assignment of grievances to relevant departments	Contractor	During Project life cycle	Social Specialist
Ensure to proper staff for stakeholder engagement including vulnerable groups	Appointment of CLOs	Contractor Subcontractor	Prior to Land Preparation	PIU HR specialist
	Appointment of female CLO	Contractor Subcontractor	Prior to Land Preparation	PIU HR specialist
Ensure to transparent, equal and accessible stakeholder participation	Constitution of accessible communication tools in any kind	Contractor	Prior to Land Preparation	Social Specialist Corporate Communication Department CLOs
	Considering language-based handicaps for any	Contractor Subcontractor	Prior to Land Preparation	Social Specialist

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KPIs	Actions	Part	Project Phase	Responsible Staff
	kind communication techniques			
	Providing a living document form used in disclosure process	Contractor	During Project life cycle	Social Specialist Corporate Communication Department CLOs
	Considering language-based handicaps for any kind communication techniques	Contractor Subcontractor	Prior to Land Preparation	Social Specialist
	Institution of PR office on-site	Contractor Subcontractor	Construction	PIU HR specialist
	Conducting stakeholders consultations	Contractor Subcontractor	During Project life cycle	PIU Social Specialist CLOs
Ensure to monitoring of subcontractor's activities	Monitoring of subcontractor's activities engaged in internal GRM and Worker's GRM	Contractor	During Project life cycle	Social Specialist HR specialist Labor force specialist OHS specialist

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7. APPENDICES

Appendix 1: Stakeholder List

Stakeholder Group	List of Stakeholders
National government institutions and organizations	<ul style="list-style-type: none"> • Ministry of Environment, Urbanization and Climate Change • Ministry of Energy and Natural Resources, General Directorate of Mining and Petroleum Affairs • Ministry of Energy and Natural Resources, General Directorate of Turkish Electricity Transmission Corporation • Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works • Ministry of Agriculture and Forestry, General Directorate of Nature Conservation and National Parks • Ministry of Agriculture and Forestry General Directorate of Forestry • Ministry of Transport and Infrastructure General Directorate of Highways • General Directorate of Conservation of Natural Assets
Local government institutions and organizations	<ul style="list-style-type: none"> • Erzin District Governorate • Erzin Municipality • Hatay Metropolitan Municipality • Hatay Provincial Directorate of Environment, Urbanization and Climate Change • Hatay Provincial Directorate of Disaster and Emergency • Hatay Provincial Directorate of Agriculture and Forestry • Hatay Investment Monitoring and Coordination Presidency • Ministry of Culture and Tourism Hatay Cultural Heritage Preservation Regional Board Directorate • Yukarıburnaz Neighborhood Mukhtarship • Hürriyet Neighborhood Mukhtarship
Interest groups such as universities and their foundations, cooperatives, local business organizations, trade associations, chambers of commerce and others	<ul style="list-style-type: none"> • Hatay Mustafa Kemal University • Iskenderun Technical University • The Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection of Natural Habitats (TEMA) Foundation Hatay Representative Office • Amanoslar Environmental Protection and Solidarity Association • Antakya Environmental Protection Association • Arsuz Environmental Protection and Beautification Association • Hand in Hand for Living Beings Association • Nature and Science Association • Erzin Environmental Protection Association • Erzin Environmental and Historical Heritage Preservation Association • Hatay Nature and Life Association • Hatay Cultural and Natural Heritage Preservation Association • Hatay Nature Conservation Association • Hatay And Erzin Culture And Aid • Iskenderun Environmental Protection Association • Blue Green Nature and Science Association • Samandağ Environmental Protection and Tourism Association • Samandağ Health and Natural Life Protection Association • Turkish Nature Conservation Association Hatay Branch • Yoncakaya Nature, Environment and Tourism Association
Settlements close to the project sites	<ul style="list-style-type: none"> • Yukarıburnaz District and Hürriyet District
People affected by the project	<ul style="list-style-type: none"> • Groups that may be disadvantaged or vulnerable (e.g. the elderly, disabled, women, etc.) • Employees of the project and contractors

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Appendix-2 Complaint Register Form

ŞİKAYET KAYIT FORMU COMPLAINT REGISTER FORM		
Şikayetin Alındığı Yer <i>Location of Complaints Received</i>		Tarih <i>Date</i>
Alan Yetkilinin Adı <i>Name of Person In Charge</i>		Şikayet Kayıt No/ <i>Complaint Register Number</i>
Şikayete Konu Alanın Koordinatları/ <i>Coordinates of the Area Subject to Complaint</i>		
Şikayet Sahibi Hakkında Bilgi <i>Complainant Info</i> Şikayet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. <i>The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond.</i>		
Ad Soyad <i>Name Surname</i>		Şikayetin Geliş Yolu <i>Form of Complaint</i>
TC Kimlik No/ <i>Identification Number</i>		Telefon- Ücretsiz hat <i>Phone –Free phone line</i> <input type="checkbox"/>
Telefon/ E-Posta <i>Telephone/ E-mail</i>		İstişareToplantısı <i>Consultation meeting</i> <input type="checkbox"/>
Mahalle-Köy-ilçe-il <i>Neighborhood-Village –District - Province</i>		Dilekçe <i>Petition</i> <input type="checkbox"/>
Posta Kodu <i>Postal Code</i>		Diğer <i>Other</i> <input type="checkbox"/>
Şikayet Detayları <i>Details of Complaint</i>		
Şikayet Konusu <i>Complaint</i>		
Şikayet sahibi tarafından talep edilen çözüm <i>Solution requested by the Complainant</i>		
Şikayeti Alan Yetkilinin Ad Soyad ve İmzası / Şikayet Sahibinin Ad Soyad ve İmzası <i>Name Surname and Signature of the Person In Charge / Name Surname and Signature of Complainant</i>		

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Appendix-3 Complaint Closure Form

ŞİKAYET KAPATMA FORMU <i>COMPLAINT CLOSURE FORM</i>	
Şikayet Kapatma Numarası: <i>Complaint Closure Number</i>	
Alınması Gereken Acil Önlemleri Tanımlayın: <i>Define Urgent Actions to be Taken:</i>	
Alınması Gereken Uzun Vadeli Önlemleri Tanımlayın (Gerekli İse): <i>Identify Long-Term Actions to Be Taken (If Necessary):</i>	
Tazminat Talebi Bulunuyor Mu? <i>Is There a Claim for Compensation?</i>	Evet / Yes <input type="checkbox"/> Hayır / No <input type="checkbox"/>
Düzeltilici Faaliyetin Kontrolü ve Kararı <i>Control and Decision of Reparative Action</i>	
Düzeltilici Faaliyetin Aşamaları <i>Phases of Reparative Action</i>	Verilen Sürenin Sona Erdiği Tarih ve Yetkili Kuruluşlar <i>The Expiry Date of the Given Period and Authorized Institutions</i>
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.

Appendix-4 Grievance Log Sample

		<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>
<i>Stakeholder Information</i>	<i>Register Number</i>					
	<i>Date</i>					
	<i>Location</i>					
	<i>Vulnerability (Yes / No) (Please specify)</i>					
<i>Information about Grievance / Complaint / Concern / Question / Feedback</i>	<i>Status of statement</i>					
	<i>Current Condition of statement</i>					
	<i>Summary of statement</i>					
	<i>Actions to be taken</i>					
	<i>Final condition of statement</i>					
<i>Staff Information</i>	<i>Registration</i>					
	<i>Assigned team / staff</i>					
	<i>Documents</i>					
	<i>Comments</i>					