

EGESA Renewable Energy Generation Inc.- Batman- 2 Solar Power Plant with Battery Energy Storage System Project

Batman Province / Central District

Stakeholder Engagement Plan

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



Project Information

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Issued to	Batman 2 Renewable Electricity Generation Inc. ("EGESA"), one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc.
Prepared by	POSEİDON Environmental Social Consulting Engineering Trade Co. Ltd. (POSEİDON)

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Prepared by

POSEİDON Environmental Social Consulting Engineering Trade Co. Ltd. (POSEİDON)

Pelin Deniz YOĞURTÇU	Project Manager / International Projects Coordinator
Yavuz HİMMETOĞLU	Project Engineer / Environmental Engineer
Ceyda TERZİ	Project Engineer / Environmental Engineer
Gözde YURTTAŞ	Biologist / Technical Coordinator
Ceren Yılmaz	Project Engineer / Environmental Engineer
Eda Ergen	Project Engineer / Environmental Engineer / H&S Expert
Mustafa KARAGÖZ	H&S Expert
Merve YILDIRIM	Sociologist
Ali Can CAN	Sociologist







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Abbreviations

Aol	Area of influence
CİMER	Presidency's Communication Centre
EGESA	Batman 2 Renewable Electricity Generation Inc. one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc.
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESG	Environmental Social Governance
ESMS	Environmental and Social Management System
ESPF	Environmental and Social Policy Framework
ESPS	Environmental and Social Performance Standards
ESS	Environmental and Social Standards
GMP	Grievance Mechanism Procedure
HS	Health and Safety
IFC	International Finance Corporation
JBIC	Japan Bank for International Cooperation
km	kilometer
KPI	Key Performance Indicators
m	meter
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
PIF	Project Introduction File
POSEİDON	POSEİDON Environmental Social Consulting Engineering Trade Ltd Co
Project Company	EGESA
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
The Project	Batman-2 Solar Power Plant Project with Battery Energy Storage (30 MWp / 20 MWe - 20 MWh)
TKYB	Development and Investment Bank of Türkiye / Türkiye Kalkınma ve Yatırım Bankası A.Ş.



YİMER

The Foreigners Communication Center



1 INTRODUCTION AND PROJECT SUMMARY

This Stakeholder Engagement Plan (“SEP”) has been prepared within the scope of the Batman-2 Solar Power Plant Project with Energy Storage, having an Installed Capacity of 30 MWp / 20 MWe and an Electricity Storage Capacity of 20 MWh (“the Project”) for Batman 2 Renewable Electricity Generation Inc. (“EGESA”) to establish a systematic framework for stakeholder identification, information disclosure, consultation, stakeholder engagement and grievance management throughout the Project lifecycle.

The SEP has been developed in accordance with the applicable national environmental and social legislation of Türkiye and the relevant requirements of the World Bank Environmental and Social Framework (“ESF”) and Environmental and Social Standards (“ESSs”), the International Finance Corporation (“IFC”) Performance Standards (“PSs”), the Caribbean Development Bank (“CDB”) Environmental and Social requirements, and other relevant international good practice requirements applicable to the Project.

The SEP aims to ensure that Project-Affected Parties and other interested stakeholders are identified and provided with timely, relevant, understandable and accessible information regarding the Project and its potential environmental and social risks and impacts. It also establishes the principles and methods for meaningful consultation and continued engagement with stakeholders, including disadvantaged or vulnerable individuals and groups, and defines the framework for receiving, recording, assessing and resolving Project-related grievances.

This SEP is a living document and will be reviewed and updated, as necessary, throughout the Project lifecycle to reflect changes in Project design and activities, stakeholder identification and engagement outcomes, grievances received, environmental and social risks and impacts, applicable lender requirements, and other Project-related developments.

1.1 Overview

The EGESA-Batman-2 Solar Power Plant Project with Battery Energy Storage System (“the Project”) will be developed by EGESA Elektrik İnşaat Enerji Üretim A.Ş. within the administrative boundaries of Çayüstü (Beda) Village/Neighborhood, Central (Merkez) District, Batman Province. The Project will have an installed solar power capacity of 30 MWp / 20 MWe and will include an integrated Battery Energy Storage System (“BESS”) with a storage capacity of 20 MWh.

The Project primarily comprises ground-mounted fixed-tilt bi-facial monocrystalline photovoltaic (PV) modules, string inverters, transformer units and associated electrical



infrastructure, together with the on-site BESS based on Lithium Iron Phosphate (LiFePO₄ / LFP) battery technology. The electricity generated by the Project will be connected to the grid through the medium-voltage (MV) busbar of the Batman-1 Transformer Substation.

Potential environmental and social risks and impacts associated with the construction and operation of the Project and its components are assessed in the relevant environmental and social documentation and will be managed through the applicable management plans and procedures. Stakeholder engagement activities throughout the Project lifecycle will be undertaken in accordance with this SEP.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (“SEP”) applies to all activities associated with the EGESA-Batman-2 Solar Power Plant Project with Battery Energy Storage System (“the Project”) throughout its lifecycle, including construction and operation activities. The requirements of this SEP also apply to contractors and subcontractors engaged in Project activities. All contractors and subcontractors will be required to comply with the relevant stakeholder engagement and grievance management requirements set out in this Plan.

The SEP establishes a systematic framework for maintaining effective, inclusive, transparent and continuous communication between the Project Company and Project stakeholders. It is intended to ensure that stakeholders are appropriately identified, informed and consulted and that their views, concerns and expectations are considered throughout the Project lifecycle. The SEP is a living document and will be reviewed and updated, as necessary, to reflect changes in Project activities, stakeholder groups and their engagement needs, stakeholder feedback, grievances received and applicable lender requirements.

The main objectives of this SEP are to:

- identify Project-Affected Parties, Other Interested Parties, and disadvantaged or vulnerable individuals or groups, and understand their interests, concerns and potential influence in relation to the Project;
- establish appropriate methods and channels for timely, meaningful, inclusive and culturally appropriate stakeholder engagement;
- ensure the timely disclosure of relevant, understandable and accessible information on the Project and its potential environmental and social risks and impacts;
- define the roles and responsibilities of the Project Company, contractors and other relevant parties in relation to stakeholder engagement;



- establish the applicable national and international standards and Project commitments relevant to stakeholder engagement;
- provide specific measures, where necessary, to facilitate the effective participation of disadvantaged or vulnerable individuals and groups;
- establish and maintain accessible channels through which stakeholders can raise questions, concerns, suggestions and grievances regarding the Project;
- ensure that stakeholder feedback and grievances are appropriately recorded, assessed, responded to and considered in Project decision-making, where relevant; and
- define the monitoring, documentation and reporting requirements for stakeholder engagement activities throughout the Project lifecycle.

Through the implementation of this SEP, the Project Company aims to establish and maintain constructive and transparent relationships with Project-Affected Parties and other stakeholders based on meaningful engagement and mutual trust. Stakeholders will be provided with relevant information on Project activities and associated environmental and social risks and impacts in a timely and understandable manner and will be provided with appropriate opportunities to express their views, concerns and expectations.

Particular attention will be given to disadvantaged or vulnerable individuals and groups who may be disproportionately affected by the Project or may face barriers to participating in stakeholder engagement activities. Where necessary, differentiated engagement and communication measures will be implemented to facilitate their effective participation and access to Project information and the grievance mechanism.

The SEP will also serve as a management tool for maintaining communication between the Project and its stakeholders, enabling the Project Company to understand and respond to stakeholder concerns, monitor stakeholder engagement outcomes, and maintain a fair, transparent and constructive dialogue throughout the Project lifecycle.

1.3 Project Information, Location and Area of Influence

The EGESA-Batman-2 Solar Power Plant Project with Battery Energy Storage System ("the Project") is located within the administrative boundaries of Çayüstü (Beda) Village/Neighborhood, Central (Merkez) District, Batman Province, Türkiye. The Project comprises a 30 MWp / 20 MWe solar power plant and an integrated Battery Energy Storage System ("BESS") with a storage capacity of 20 MWh.



The Project Area covers approximately 77.73 hectares and comprises nine registered cadastral parcels under Block 138 (Parcels 78, 79, 80, 81, 82, 83, 84, 85 and 86). The main Project components include ground-mounted photovoltaic modules, inverters, transformer units, the BESS and associated infrastructure.

The grid connection of the Project will be provided through an approximately 11 km electrical transmission line (“ETL”). Approximately 7.5 km of the ETL will be routed underground, while the remaining approximately 3.5 km will consist of an overhead line. The Project Area and the underground and overhead sections of the ETL are presented in Figure 1-1.

For the purposes of this SEP, the Area of Influence (“Aoi”) has been defined by considering the potential interaction of stakeholders and communities with both the Project Area and the ETL route. A 500 m radius around the Project Area has been considered for the identification of nearby settlements and sensitive human receptors. In addition, settlements located along or in the vicinity of the ETL route have been included in the social Aoi, considering their potential interaction with construction, access, installation and operational activities associated with the ETL.

As shown in Figure 1-1, Çayüstü, Recepler, Karayün and İrmi Neighborhoods have been identified within the social Aoi based on their proximity to the Project Area and/or their location along or in the vicinity of the ETL route. The neighborhood markers shown in Figure 1-1 indicate the approximate centers of these settlements and do not represent their administrative boundaries. The population data for the settlements identified within the social Aoi are provided in Table 1-1.

In addition to the neighborhood centers, the nearest individual residential receptors to the Project Area were identified separately in order to characterize the immediate social setting more accurately. As presented in Figure 1-1, these receptors are shown as “Settlement Near the Project Area – I” and “Settlement Near the Project Area – II”. Settlement I is located approximately 590 m northeast of the Project Area, while Settlement II is located approximately 270 m southeast of the Project Area, based on straight-line distances. These points represent the nearest identified residential houses/structures and should therefore be distinguished from the neighborhood-center markers presented on the same map.

Accordingly, the Aoi considered under this SEP encompasses the Project Area and its immediate surroundings, the ETL route, settlements located along or in the vicinity of the ETL route, and the nearest residential receptors around the Project Area. This approach allows stakeholder identification and engagement activities to address both communities potentially



affected by the SPP and BESS facilities and those that may be affected by or interact with the associated ETL infrastructure throughout the construction and operation phases.

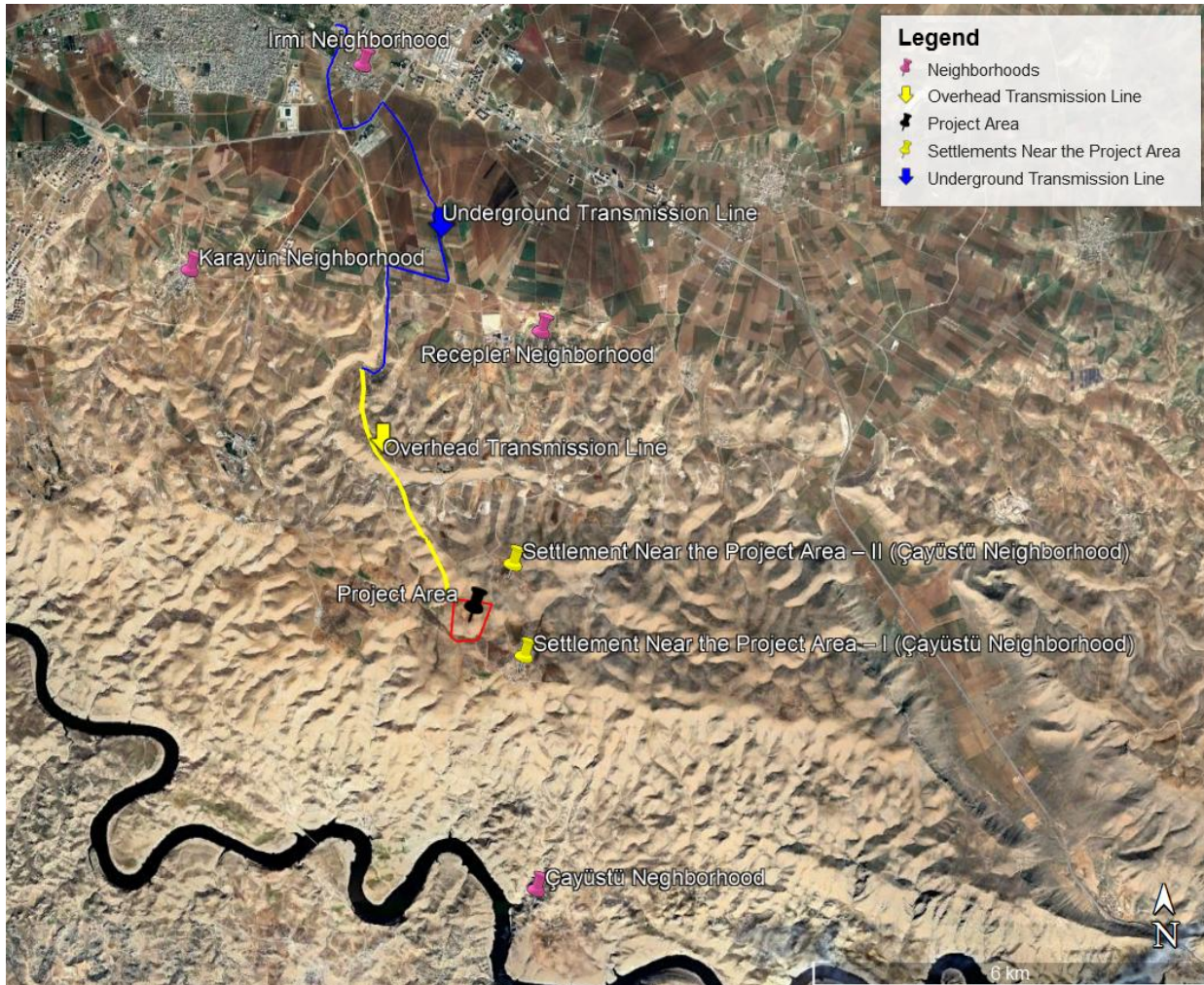


Figure 1-1 Aol of the Project

Table 1-1 Population of Settlements within the Area of Influence*

Neighborhood	Female Population	Male Population	Total Population
Çayüstü	95	133	228
Karayün	503	494	997
Recepler	345	413	758
İrmî	1246	661	1907
Total	2189	1701	3890

*Source: TurkStat, 2025.



1.4 Potential Project Impacts and Summary of Mitigations

Table 1-2 Potential Project Impacts and Mitigation

Potential Impact Area	Potential Impacts	Impact Level (Local, National, Regional/Global)	Impact Characteristics					Risk Mitigation and Improvement Measures	Uncertainties and Data Gaps
			Magnitude	Significance	Reversibility	Scope	Duration		
Environmental Impacts	Soil disturbance, erosion and temporary loss of topsoil associated with site preparation, excavation, installation of PV structures, BESS and transformer units, internal roads and underground ETL works	Local	Medium	Moderate	Reversible	Limited	Short-term	Minimize unnecessary land disturbance; strip and store topsoil separately where applicable; implement erosion and sediment control measures; restrict activities to designated work areas; reinstate temporarily disturbed areas	Final construction methodology and temporary work areas may be further refined prior to construction.



								following construction	
	Dust, exhaust emissions, noise and vibration associated with earthworks, construction machinery, vehicle movements and transportation of Project components	Local	Medium	Moderate	Reversible	Project Area, ETL route, access roads and nearby sensitive receptors	Short-term during construction	Apply dust suppression where necessary; maintain construction vehicles and machinery; establish speed limits; avoid unnecessary idling; schedule noisy activities appropriately; inform nearby communities in advance where activities may cause temporary disturbance.	Final construction traffic volumes, equipment numbers and detailed construction schedule may be further refined
	Vegetation clearance, habitat	Local	Medium	Moderate	Partly reversible	Project Area and ETL corridor	Mainly short-term during	Restrict vegetation clearance to	Detailed mitigation requirement



	disturbance and potential impacts on local flora and fauna associated with the Project footprint and ETL construction						construction; some land-use change will continue during operation	required areas; avoid unnecessary disturbance outside designated construction zones; implement relevant biodiversity mitigation measures; reinstate temporarily disturbed areas where practicable; undertake monitoring where required.	s may be updated based on final design and applicable ecological assessments.
Social Impacts	Temporary disturbance to land use, access and local road users due to construction activities, particularly along the	Local	Medium	Moderate	Reversible	Project Area, ETL route	Short-term during construction	Minimize temporary access restrictions; maintain safe access where practicable; provide advance	Final ETL construction methodology, temporary access requirements and construction schedule may be



	approximately 11 km ETL route							information to affected land users and communities ; coordinate construction activities with relevant local authorities and stakeholders; manage grievances through the Project Grievance Mechanism.	further refined.
	Community health and safety risks associated with construction traffic, heavy vehicles, open excavations, electrical works and interaction	Local	Medium	Moderate	Reversible	Project Area, ETL route, access roads and nearby settlements/residential receptors	Primarily short-term during construction	Implement traffic and community health and safety measures; secure construction and excavation areas; install warning signs and barriers;	Final contractor arrangements, traffic volumes and detailed work schedule will be confirmed prior to construction.



	between Project activities and nearby communities							establish speed limits; provide advance information on activities affecting local access or traffic; maintain accessible grievance channels.	
	Potential nuisance and disturbance to the nearest residential receptors and settlements due to noise, dust, traffic and construction activities	Local	Medium	Negative	Reversible	Nearby residential receptors, including residences identified approximately 270 m and 590 m from the Project Area, and settlements along the ETL route	Short-term during construction	Apply dust, noise and traffic controls; schedule activities to minimize disturbance; communicate potentially disruptive activities in advance; maintain ongoing engagement with affected communities; record and	Actual disturbance will depend on construction schedule, equipment and traffic intensity.



								respond to grievances.	
Environmental and Social Improvement Opportunities	Contribution to renewable energy generation, energy storage capacity and reduction of reliance on conventional electricity generation	Local to Regional	Medium	Positive	Reversible	Moderate	Long-term	Maintain efficient operation of the SPP and BESS; undertake preventive maintenance and monitor Project performance throughout operation.	Actual generation and storage performance will depend on operational conditions and system performance.



Opportunities for Environmental and Social Enhancements

- Landscaping with native species can enhance local biodiversity.
- Employment of local workforce can directly contribute to the regional economy.
- Long-term vocational training and capacity building programs can increase local employability.
- Health and safety awareness campaigns can reduce community-level risks.
- Implementation of recycling and waste minimization practices can support sustainable production.

This table adheres strictly to the outlined instructions, addressing potential impacts, mitigation measures, and opportunities comprehensively.

1.5 Definitions

Project Affected People (PAP): Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Stakeholder: All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Internal Stakeholders: Groups or individuals within a business who work directly within the business, such as employees and contractors.

External Stakeholders: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

Vulnerable People: People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Grievance: An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner.



Complaint: A notification provided by a community member, group or institution to The Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.

Grievance Mechanism: A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.

1.6 Key Principles

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

- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.

2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

2.1 Applicable Standards and Guidelines

The international standards and guidelines which The Project will follow are set by World Bank Environmental and Social Framework (“ESF”) and Environmental and Social Standards (“ESSs”), the International Finance Corporation (“IFC”) Performance Standards (“PSs”), the Caribbean Development Bank (“CDB”) Environmental and Social requirements.

This SEP has been prepared based on national and international requirements and standards applicable to the Project. Throughout the life of the Project, Project Company will follow the following “Project Standards”:

- National Environmental Legislation,
- TKYB Environmental and Social Policy



- IFC Performance Standards,
- World Bank Environmental and Social Standards and,
- CDP Environmental and Social Standards.

Particularly, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement. Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties influencing, and/or that may be affected by the activities and implementations of The Project; and to develop an appropriate procedure to identify and confirm them,
- To prepare a database comprised of the relevant stakeholder of The Project and its associated facilities and to continuously update it,
- To review this database in consultation with relevant parties,
- To provide necessary information and consultancy services to all stakeholders by facilitating their required contributions on the environmental and social issues that may affect them,
- To continuously protect respectful and constructive relations with stakeholders based on mutual confidence and honesty, and by respecting the values of the stakeholders.

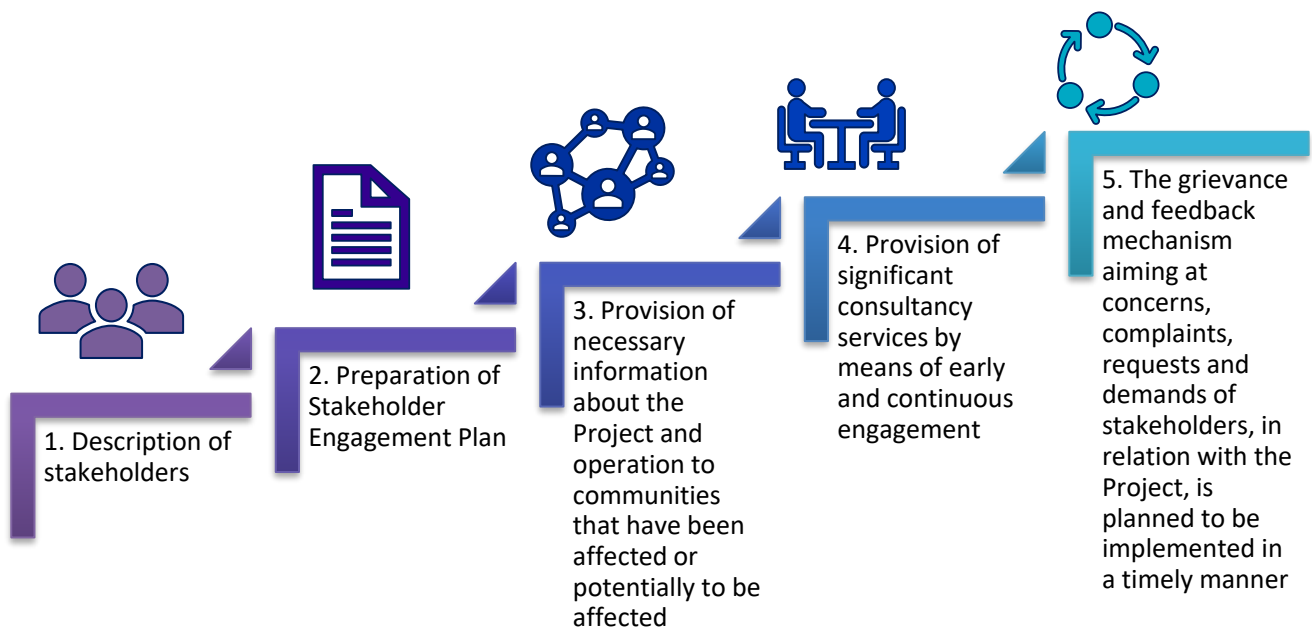


Figure 2-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement



2.1.1 National Requirements

2.1.1.1 Turkish Standards and Requirements

The Constitution of The Republic of Turkey

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

X. Legal Egalitarianism

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

II. Prohibition of Forced Labor

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

VII. Freedom of Thought and Opinion

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

VIII. Freedom of Expression and Dissemination of Thought

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

VII. Right of Petition

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



Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

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

Labour Law

The Principle of Equal Treatment

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

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

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

Overtime Work

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

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be



performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

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

Unions and Collective Agreements Law

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

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on Environmental Impact Assessment ("EIA") (Official Gazette, 29 July 2022, no 31907) is defined which includes a limited public disclosure process.

According to the Regulation on Environmental Impact Assessment published in the Official Gazette No. 31907, it is included in the Annex-2 List. In this context, a Project Introduction File ("PIF") (dated 10.02.2023) has been prepared for The Project.

2.1.1.2 Environmental and Social Risk Management of TKYB

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

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



The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,
- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system,
- Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

2.1.2 International Requirements

2.1.2.1 IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

- An Environmental and Social Management System ("ESMS") should be prepared and implemented, and the element of stakeholder engagement should be included,
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature, and scale of The Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for The Project company to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation is to be conducted.

IFC has defined "Key Concepts and Principles of Stakeholder Engagement" in its A Good Practice Handbook. The building blocks of stakeholder engagement are listed below:



- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders

Key requirements of *PS1* involve:

- To develop a grievance mechanism to receive and facilitate the resolution of Affected Communities' concerns and grievances related to environmental and social performance of The Project,
- To identify the risks and impacts of the Affected Communities and other stakeholders,
- To maintain an understandable, culturally appropriate, accessible and transparent consultation to stakeholders through early and ongoing engagement,
- To inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
- To follow the developed grievance mechanism to receive and respond to stakeholder concerns related to The Project promptly.
- To establish a monitoring and review procedures of the concerns and grievances raised by Affected Communities and stakeholders.

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

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

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

Workers' Organizations



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

Non-Discrimination and Equal Opportunity

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

Retrenchment

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

Child Labor

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

Forced Labor

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



Grievance Mechanism

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

Occupational Health and Safety

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

Workers Engaged by Third Parties

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

Supply Chain

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



2.1.2.2 World Bank Environmental and Social Standards

The World Bank Environmental and Social Framework (“ESF”) sets out the requirements for the identification, assessment and management of environmental and social risks and impacts throughout the Project lifecycle. Stakeholder engagement is an integral component of the ESF and is primarily addressed under Environmental and Social Standard 10 (“ESS10”): Stakeholder Engagement and Information Disclosure. Other Environmental and Social Standards, particularly ESS2: Labor and Working Conditions and, where applicable, ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, also contain requirements relevant to stakeholder engagement and grievance management.

Stakeholder Engagement and Information Disclosure – ESS10

ESS10 recognizes the importance of open and transparent engagement between the Project and its stakeholders as an essential element of good international practice. Stakeholder engagement is expected to be an inclusive and continuous process conducted throughout the Project lifecycle and proportionate to the nature and scale of the Project and its potential environmental and social risks and impacts.

The key requirements of ESS10 relevant to this SEP include:

- Project stakeholders will be identified and analyzed, including Project-Affected Parties, Other Interested Parties, and disadvantaged or vulnerable individuals or groups who may be affected by or have an interest in the Project.
- Stakeholder engagement will be undertaken throughout the Project lifecycle and will commence as early as practicable in the Project development process.
- This SEP will define the timing, methods, responsibilities and resources for stakeholder engagement and will be reviewed and updated, as necessary, throughout Project implementation.
- Project-Affected Parties and other relevant stakeholders will be provided with timely, relevant, understandable and accessible information regarding the Project, including its purpose, nature and scale, duration, potential environmental and social risks and impacts, proposed mitigation measures, stakeholder engagement process and available grievance mechanism.
- Stakeholder engagement and consultation activities will be conducted in a meaningful, inclusive, culturally appropriate and accessible manner, free of manipulation, interference, coercion, discrimination and intimidation.



- Stakeholders will be provided with opportunities to express their views, concerns, expectations and recommendations regarding the Project, and relevant stakeholder feedback will be considered in Project planning and implementation, as appropriate.
- Particular attention will be given to disadvantaged or vulnerable individuals or groups who may be more likely to be adversely affected by Project impacts or may face barriers in accessing Project information or participating in stakeholder engagement activities.
- Where necessary, differentiated engagement and communication measures will be developed and implemented to facilitate the effective participation of disadvantaged or vulnerable individuals and groups.
- Records of stakeholder engagement activities, including consultations undertaken, feedback received and how such feedback has been considered, will be maintained throughout the Project lifecycle.
- The Project will continue to provide relevant information to and engage with Project-Affected Parties and other stakeholders throughout Project implementation in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the Project.

Grievance Mechanism – ESS10

In accordance with ESS10, an accessible and inclusive grievance mechanism will be established and maintained to receive and facilitate the resolution of concerns and grievances from Project-Affected Parties regarding the environmental and social performance of the Project.

The grievance mechanism will:

- be proportionate to the potential environmental and social risks and impacts of the Project and accessible to Project-Affected Parties;
- allow grievances, concerns, requests and suggestions to be submitted through multiple accessible channels;
- address grievances promptly, effectively, transparently and in a culturally appropriate manner;
- be available without cost to complainants and without retaliation, discrimination or other adverse consequences for its use;
- allow anonymous grievances to be submitted and addressed;
- protect the confidentiality and privacy of complainants, where requested or required;



- include appropriate arrangements for handling sensitive grievances, including Sexual Exploitation and Abuse/Sexual Harassment (“SEA/SH”) related grievances, in a confidential and survivor-centered manner;
- ensure that stakeholders are informed about the available grievance channels, grievance handling process and relevant response timeframes; and
- not prevent or restrict complainants from accessing judicial or administrative remedies available under national legislation.

The grievance mechanism and its implementation arrangements are described in detail in the relevant section of this SEP.

Labor and Working Conditions – ESS2

ESS2 recognizes the importance of fair treatment of Project workers and the provision of safe and healthy working conditions. In relation to stakeholder engagement and grievance management, ESS2 requires appropriate communication with Project workers and the establishment of a mechanism through which workers can raise workplace concerns.

The key requirements of ESS2 relevant to this SEP include:

- Project workers will be provided with clear and understandable information and documentation regarding their terms and conditions of employment and their rights under applicable national labor legislation.
- Workers will be informed about relevant Project policies, occupational health and safety requirements, codes of conduct and available channels for raising workplace concerns.
- A worker grievance mechanism will be made available to Project workers, including direct and contracted workers, to enable them to raise workplace-related concerns.
- Workers will be informed about the worker grievance mechanism at the time of recruitment and throughout their employment.
- The worker grievance mechanism will be readily accessible, understandable and transparent and will provide timely feedback to workers regarding concerns raised.
- Workers will be able to raise concerns confidentially and, where appropriate, anonymously, without fear of retaliation, discrimination or other adverse consequences.
- Contractors and subcontractors will be required to ensure that their workers have access to a grievance mechanism consistent with ESS2 requirements.
- The worker grievance mechanism will not impede access to other judicial or administrative remedies available under national legislation or applicable collective agreements.



Land Acquisition, Restrictions on Land Use and Involuntary Resettlement – ESS5

ESS5 is relevant to stakeholder engagement where Project activities result in land acquisition, restrictions on land use, physical displacement or economic displacement. Considering that the Project includes the main SPP and BESS area as well as the associated ETL, stakeholder engagement will consider persons and land users who may potentially be affected by land access requirements or temporary or permanent land-use restrictions associated with Project components.

Where ESS5-related impacts are identified, the Project will:

- identify persons, households and land users potentially affected by land acquisition or restrictions on land use;
- provide affected persons with timely and understandable information regarding Project-related land requirements and potential impacts;
- undertake meaningful consultation with affected persons regarding potential impacts, mitigation measures and applicable compensation or livelihood restoration measures, where relevant;
- pay particular attention to disadvantaged or vulnerable affected persons who may experience disproportionate impacts or face barriers to participation;
- maintain appropriate records of consultation and engagement with affected persons; and
- ensure that land-related concerns and grievances can be submitted and addressed through an accessible grievance mechanism.

2.1.2.3 CDB Environmental and Social Standards

The Project has been developed in alignment with the Caribbean Development Bank (“CDB”) Environmental and Social Review Procedures, which establish requirements for the identification, assessment and management of environmental and social risks and impacts throughout the Project lifecycle. With respect to stakeholder engagement, information disclosure and grievance management, the Performance Requirements (“PRs”) particularly relevant to this SEP are PR5: Directly Affected Communities, PR6: Vulnerable Groups, PR7: Land Acquisition and Involuntary Resettlement, and PR8: Community, Worker Health and Safety.

PR5: Directly Affected Communities



PR5 emphasizes the identification and meaningful engagement of communities that may be directly affected by Project activities and the management of potential adverse social impacts on these communities. Engagement with directly affected communities should be undertaken throughout the relevant stages of the Project and should enable affected stakeholders to receive appropriate information and communicate their views, concerns and expectations.

The key requirements of PR5 relevant to this SEP include:

- Directly affected communities will be identified considering the nature, location and potential environmental and social impacts of the Project and its associated infrastructure.
- Affected communities will be provided with timely, relevant, understandable and accessible information regarding Project activities, potential impacts and applicable mitigation measures.
- Meaningful consultation will be undertaken with affected communities to enable them to express their views, concerns, expectations and recommendations regarding the Project.
- Stakeholder engagement methods will be appropriate to the characteristics and needs of affected communities and will facilitate effective participation.
- Engagement with affected communities will continue, as appropriate, throughout the construction and operation phases of the Project.
- An accessible grievance mechanism will be maintained to enable affected communities to submit Project-related questions, concerns, suggestions and grievances and to facilitate their timely resolution.

For the Project, these requirements are particularly relevant to communities and residential receptors located in the vicinity of the SPP and BESS facilities and to communities located along or in the vicinity of the associated ETL route.

PR6: Vulnerable Groups

PR6 requires particular attention to individuals and groups who may be disproportionately affected by Project-related impacts or who may experience barriers to accessing information, participating in consultation activities or benefiting from Project opportunities.

The key requirements of PR6 relevant to this SEP include:



- Disadvantaged or vulnerable individuals and groups within the Project's Area of Influence will be identified as part of the stakeholder identification and social assessment process.
- The specific circumstances, needs and potential barriers to participation of vulnerable stakeholders will be considered when planning stakeholder engagement activities.
- Where necessary, differentiated and culturally appropriate engagement measures will be implemented to facilitate their meaningful participation.
- Project information will be disclosed through accessible and appropriate communication methods, taking into consideration factors that may restrict access to information or consultation activities.
- Vulnerable stakeholders will have effective access to the Project grievance mechanism, and additional assistance will be provided where necessary to enable them to submit concerns or grievances.
- Engagement activities will be conducted in a manner that avoids discrimination and promotes equitable participation in the stakeholder engagement process.

PR7: Land Acquisition and Involuntary Resettlement

PR7 addresses environmental and social risks and impacts associated with land acquisition, restrictions on land use, physical displacement and economic displacement. From a stakeholder engagement perspective, early and meaningful engagement with persons potentially affected by Project-related land requirements is an important component of identifying and managing such impacts.

Considering that the Project comprises the main SPP and BESS area as well as an approximately 11 km ETL, including underground and overhead sections, the requirements of PR7 will be considered, where applicable, for persons and land users potentially affected by land access requirements or temporary or permanent restrictions on land use.

The key requirements of PR7 relevant to this SEP include:

- Persons, households and land users potentially affected by Project-related land requirements will be identified and appropriately engaged.
- Affected persons will be provided with timely and understandable information regarding Project-related land requirements, potential restrictions on land use and associated impacts.



- Meaningful consultation will be undertaken regarding potential land-related impacts and applicable mitigation, compensation and livelihood restoration measures, where relevant.
- Particular attention will be given to vulnerable affected persons who may experience disproportionate impacts or face barriers to participating in consultation processes.
- Consultation and engagement with affected persons will be appropriately documented.
- Land-related concerns and grievances will be received and addressed through an accessible and transparent grievance mechanism.

PR8: Community, Worker Health and Safety

PR8 addresses health and safety risks to both workers and communities associated with Project activities. Stakeholder engagement and effective communication are important for identifying, communicating and managing community health and safety risks and for enabling workers to raise workplace-related concerns.

The key requirements of PR8 relevant to this SEP include:

- Communities potentially exposed to Project-related health and safety risks will be identified and provided with appropriate information regarding relevant risks and preventive measures.
- Appropriate communication will be maintained with potentially affected communities regarding construction activities, traffic movements, electrical hazards, ETL works, emergency situations and other activities that may affect community health and safety.
- Stakeholders will have access to appropriate channels for raising concerns or grievances related to community health and safety.
- Project workers, including contractor and subcontractor personnel, will be appropriately informed about occupational health and safety requirements, workplace rules and relevant grievance channels.
- Workers will have access to an effective grievance mechanism through which workplace concerns, including occupational health and safety matters, working conditions, discrimination and harassment, can be raised.
- Worker grievances will be handled without retaliation, discrimination or intimidation, and confidentiality will be maintained where appropriate.
- Contractors and subcontractors will be required to comply with applicable Project requirements regarding worker communication, occupational health and safety and grievance management.



2.1.2.4 Other Relevant International Good Practice Requirements

In addition to the standards listed above, the Project will consider other relevant international good practice requirements requested by the lenders. These may include good practice approaches for inclusive consultation, gender-sensitive engagement, worker grievance mechanisms, community health and safety communication, contractor engagement, emergency communication and disclosure of Project-related information.

Accordingly, the SEP will be implemented as a living document and will be updated when needed. Updates may be required due to changes in Project design, construction schedule, stakeholder feedback, grievance mechanism outcomes, lender comments, monitoring findings or changes in applicable environmental and social requirements.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology

This section describes the methodology used to identify and analyze stakeholders who may be affected by, have an interest in, or have the ability to influence the Project and its environmental and social performance. The stakeholder identification and analysis process aims to establish and maintain constructive relationships with stakeholders, ensure that potentially affected parties are appropriately represented in the engagement process, and enable their concerns, expectations, views and suggestions to be considered throughout the Project lifecycle.

Stakeholder identification and analysis considers the Project Area, the associated Battery Energy Storage System (“BESS”), the Electrical Transmission Line (“ETL”) route and the social Area of Influence (“AoI”), as well as the nature and extent of potential interactions between Project activities and relevant stakeholders.

Identification and Categorization of Stakeholders

Stakeholders have been identified based on their relationship with the Project, their potential to be affected by Project activities, and their interest in or influence over the Project. In accordance with applicable international standards, stakeholders are broadly categorized as:

Project-Affected Parties (“PAPs”), including individuals, households, communities, landowners and land users who may experience direct or indirect environmental and social impacts associated with the Project Area and/or the ETL;



Other Interested Parties (“OIPs”), including relevant governmental authorities, local administrations, non-governmental organizations, local businesses and other organizations or individuals with an interest in the Project; and

Disadvantaged or Vulnerable Individuals or Groups, who may be disproportionately affected by Project impacts or may face barriers in accessing Project information, participating in consultation activities or using the Project grievance mechanism.

Stakeholder Analysis and Prioritization

Stakeholders are analyzed and prioritized according to their potential level of exposure to Project-related impacts, their interests and concerns, their vulnerability, their influence on or relationship with the Project, and their specific engagement needs. Particular attention is given to stakeholders directly affected by Project activities and to disadvantaged or vulnerable individuals and groups who may require differentiated engagement measures.

The proximity of communities and residential receptors to the Project Area, as well as the potential interaction of settlements, landowners and land users with the ETL route, is also considered as part of the stakeholder analysis.

Determination of Engagement Channels and Methods

Engagement methods will be selected according to the characteristics, needs and preferences of different stakeholder groups and the nature of the information to be communicated. Methods may include face-to-face meetings, individual consultations, focus group discussions, meetings with local authorities and mukhtars, informational materials, announcements and appropriate digital communication channels.

Where necessary, differentiated engagement methods will be applied to facilitate the effective participation of disadvantaged or vulnerable individuals and groups and to ensure that Project information is provided in an accessible, understandable and culturally appropriate manner.

Continuous Review and Evaluation

Stakeholder identification and analysis will be an ongoing process throughout the Project lifecycle. The stakeholder list, stakeholder categories, engagement needs and appropriate communication methods will be periodically reviewed and updated to reflect changes in Project activities, the social Area of Influence, stakeholder circumstances, feedback received and emerging environmental and social issues.



The outcomes of stakeholder engagement activities, including concerns, expectations, recommendations and grievances raised by stakeholders, will be documented and considered in the planning and implementation of subsequent engagement activities and, where relevant, in the management of Project-related environmental and social risks and impacts.

3.2 Stakeholder Identification

Stakeholder identification has been carried out to determine the individuals, groups, institutions and organizations that may be affected by the Project or may have an interest in the Project due to their location, land use and livelihood activities, institutional mandate, technical expertise or social role. The stakeholder identification process considers the Project's social Area of Influence ("Aol"), the location of the Project Area and associated Electrical Transmission Line ("ETL"), nearby settlements and residential receptors, potential environmental and social risks and impacts, land use and livelihood activities, disadvantaged or vulnerable groups, and the roles and responsibilities of relevant institutions.

For the purposes of stakeholder identification, consideration has been given not only to stakeholders located in the immediate vicinity of the Solar Power Plant ("SPP") and Battery Energy Storage System ("BESS") facilities, but also to individuals and communities that may interact with or potentially be affected by the approximately 11 km ETL and its associated construction and access activities. Accordingly, Çayüstü, Recepler, Karayün and İrmi Neighborhoods have been considered within the stakeholder identification process based on their proximity to the Project Area and/or their location along or in the vicinity of the ETL route. The nearest individual residential receptors identified around the Project Area have also been considered in the identification of potentially affected stakeholders.

Stakeholders have been categorized considering the nature and degree of their potential interaction with the Project. Project-Affected Parties ("PAPs") include nearby communities and residential receptors, landowners and land users potentially affected by the Project and ETL, and other individuals or groups that may experience Project-related environmental or social impacts. Other Interested Parties ("OIPs") include relevant governmental authorities, local administrations, sectoral institutions, non-governmental organizations and other organizations with an interest in or institutional responsibility related to the Project. Disadvantaged or vulnerable individuals and groups are considered separately to ensure that potential barriers to accessing information, participating in consultation activities and using the Project grievance mechanism are appropriately addressed.



The level of interest and potential impact assigned to each stakeholder group is based on the stakeholder group's relationship with the Project, potential exposure to Project-related environmental and social impacts, institutional responsibilities, livelihood or land-use interactions, and specific engagement needs. These classifications will be reviewed and updated, as necessary, throughout the Project lifecycle as additional information becomes available and stakeholder engagement progresses.

The main stakeholder groups identified for the Project are presented below.



Table 3-1 Stakeholder Groups

Stakeholder Group	Identified Stakeholders	Level of Interest	Level of Potential Impact
Project-affected settlements and local communities	Çayüstü, Recepler, Karayün and İrmi Neighborhoods and communities located in the vicinity of the Project Area and/or ETL route	High	Medium
Mukhtars and local representatives	Mukhtars of Çayüstü, Recepler, Karayün and İrmi Neighborhoods	High	Medium
Local households and nearby residential receptors	Households and individual residential receptors located in the vicinity of the Project Area and/or ETL route, including the nearest identified residential receptors	High	Medium
Landowners and land users potentially affected by the ETL	Owners, users and other right holders of parcels potentially affected by temporary or permanent land requirements, access needs or land-use restrictions associated with the ETL	High	High
Agricultural and livestock users	Households and individuals engaged in agricultural and/or livestock activities within the social Area of Influence and along or in the vicinity of the ETL route	Medium	Medium
Disadvantaged and vulnerable individuals/groups	Individuals and groups who may be disproportionately affected by Project impacts or face barriers to participation, including, as applicable, elderly persons, persons with disabilities, female-headed households and low-income households	Medium	Medium
Project workers	Existing and future personnel engaged in the construction, installation, operation and maintenance of the Project	High	High
Contractors and subcontractors	Contractors and subcontractors engaged in construction, installation, transportation, security, operation, maintenance, waste management and other Project-related services	High	High
Project Company and Project Management	EGESA Elektrik İnşaat Enerji Üretim A.Ş., Project management and environmental, social and OHS personnel	High	High
Local public authorities and administrations	Batman Governorate; Batman Municipality	High	Medium



Environmental authorities	Ministry of Environment, Urbanization and Climate Change; Batman Provincial Directorate of Environment, Urbanization and Climate Change	High	Medium
Energy authorities and sector institutions	Ministry of Energy and Natural Resources; Energy Market Regulatory Authority ("EMRA"); Turkish Electricity Transmission Corporation ("TEİAŞ"); Dicle Electricity Distribution Inc. ("DEDAŞ")	High	Medium
Agriculture and livestock authorities	Ministry of Agriculture and Forestry; Batman Provincial Directorate of Agriculture and Forestry	Medium	Low
Health and emergency response institutions	Batman Provincial Directorate of Health; Batman Provincial Directorate of Disaster and Emergency ("AFAD"); Batman Municipality Fire Department; 112 Emergency Health Services	Medium	Medium
Cultural heritage authorities	Ministry of Culture and Tourism; Batman Provincial Directorate of Culture and Tourism; Diyarbakır Cultural Heritage Preservation Regional Board Directorate	Low	Low
Educational and academic institutions	Batman University	Medium	Low
Non-governmental organizations and civil society	Environmental, social development, rural development, agriculture and livestock-related non-governmental organizations and professional organizations operating in Batman	Medium	Low
Local businesses and service providers	Local suppliers, transportation companies, food and catering service providers and other goods and service providers operating in Batman and the Project's social Area of Influence	Medium	Low
Road users and communities along access routes	Local residents, agricultural and livestock users and other road users who may interact with Project-related construction and transportation traffic along Project access routes	Medium	Medium



3.3 Project Affected People and Other Interested Parties

Project-Affected People

Local Communities

Local communities located within or in the vicinity of the Project's social Area of Influence ("Aol") constitute one of the key groups of Project-Affected People. Based on their proximity to the Project Area and/or the associated Electrical Transmission Line ("ETL") route, Çayüstü, Recepler, Karayün and İrmi Neighborhoods have been identified as relevant local communities for stakeholder engagement.

These communities may potentially be affected by construction-related traffic, transportation of Project components, excavation and installation works, temporary access restrictions, noise and dust, community health and safety risks, and activities associated with the construction and operation of the SPP, BESS and ETL. Potential positive effects may include temporary employment, local procurement and service opportunities during Project implementation.

Mukhtars and Local Community Representatives

The mukhtars of Çayüstü, Recepler, Karayün and İrmi Neighborhoods are key stakeholders for maintaining communication between the Project and local communities. Mukhtars may support the dissemination of Project-related information, identification of local concerns and potentially affected persons, organization of consultation activities, communication of construction schedules and temporary access restrictions, and communication of grievances, requests and suggestions raised by local residents.

Engagement with mukhtars will complement, rather than replace, direct engagement with Project-Affected People, particularly persons potentially affected by land acquisition, land-use restrictions or livelihood impacts.

Households and Residential Receptors in the Vicinity of the Project

Households and individual residential receptors located in the vicinity of the Project Area and ETL route may be directly or indirectly affected by Project activities. In particular, the nearest residential receptors identified around the Project Area, including those located approximately 270 m southeast and 590 m northeast of the Project Area, are considered relevant receptors for stakeholder engagement.

Potential impacts may include temporary disturbance associated with construction traffic, noise, dust, excavation and installation activities, changes in access conditions, and



community health and safety risks. These households and residential receptors will therefore be considered in the planning and implementation of Project information disclosure, consultation and grievance management activities.

Landowners, Land Users and Other Right Holders

Landowners, land users and other persons holding formal or informal rights or interests in land required for the Project constitute an important group of Project-Affected People. This includes persons potentially affected by land requirements associated with the Project Area and the approximately 11 km ETL, including its underground and overhead sections, as applicable.

Potential impacts may relate to permanent or temporary land requirements, easement rights, restrictions on land use, temporary occupation, access restrictions, construction activities and impacts on land-based assets or livelihood activities.

Stakeholder engagement with these persons will be coordinated with the Project's land acquisition and livelihood restoration processes. A Livelihood Restoration Plan ("LRP") will be prepared, as applicable, to identify and address Project-related impacts on livelihoods and to define appropriate livelihood restoration measures for affected persons. The identification of affected persons and the outcomes of consultations undertaken as part of the LRP process will be reflected in and coordinated with the implementation and future updates of this SEP.

Persons Affected by Historical Land Acquisition and Land-Related Processes

Persons who have been affected by land acquisition, land transfer, land-use restrictions or other land-related processes undertaken prior to the preparation of the current environmental and social documentation are also considered relevant Project-Affected People.

An Ex-Post Social Audit will be undertaken to assess historical land acquisition and land-related processes against applicable Project requirements and to identify any outstanding gaps, legacy issues or corrective actions, where applicable. Persons identified through the Ex-Post Social Audit as having experienced Project-related impacts, including any persons requiring further consultation, compensation, livelihood restoration or other corrective measures, will be incorporated into the stakeholder engagement process.

Engagement with these persons will be undertaken in a transparent and accessible manner, and any outstanding concerns or grievances identified through the audit process will be documented and addressed through the applicable corrective action and grievance management processes.



Agricultural and Livestock Users

Individuals and households engaged in agricultural and livestock activities within the Project's social Aol and along or in the vicinity of the ETL route are relevant stakeholders, particularly where Project activities interact with agricultural land, access routes or livelihood activities.

Potential impacts may include temporary or permanent restrictions on access to land, disturbance to agricultural activities, impacts on crops or other land-based assets, construction traffic and temporary disruption during ETL installation. Where Project-related livelihood impacts are identified, affected persons will be considered within the land acquisition and livelihood restoration process and appropriate measures will be defined through the LRP, as applicable.

Vulnerable and Disadvantaged Groups

Vulnerable or disadvantaged individuals and groups may include, as applicable, elderly persons, persons with disabilities, female-headed households, low-income households and other individuals who may be disproportionately affected by Project impacts or face barriers in accessing information, participating in consultation activities or using grievance channels.

Stakeholder engagement methods will therefore be adapted, where necessary, to facilitate their meaningful participation. The identification of vulnerable persons will be further informed by social baseline studies, stakeholder consultations, the LRP and the Ex-Post Social Audit, as applicable.

Project Workers

Existing and future workers engaged in the construction, installation, operation and maintenance of the Project are key affected stakeholders. This includes direct workers as well as contracted workers, as applicable.

Workers may be affected by working conditions, occupational health and safety risks, working hours, wages and benefits, accommodation arrangements, discrimination and harassment, contractor management practices and access to grievance channels. Worker engagement will be supported through induction and training activities, internal communication channels, occupational health and safety arrangements and the worker grievance mechanism.

Contractors and Subcontractors

Contractors and subcontractors involved in construction, installation, transportation, security, operation, maintenance, waste management and other Project-related activities may both



affect and be affected by the Project. Their environmental and social performance will be important for the management of occupational health and safety, labor and working conditions, traffic and road safety, community health and safety, environmental impacts and community relations.

Contractors and subcontractors will therefore be required to comply with applicable Project environmental and social requirements, including stakeholder communication and worker grievance mechanism requirements.

Other Interested Parties

Project Company and Project Management

EGESA Elektrik İnşaat Enerji Üretim A.Ş. and the relevant Project management, environmental, social and occupational health and safety personnel are responsible for Project implementation and the management of environmental and social performance. Their responsibilities include stakeholder engagement, implementation of the grievance mechanisms, contractor management and monitoring, coordination of land and livelihood-related processes, and implementation and follow-up of actions arising from the LRP and Ex-Post Social Audit.

Local Authorities and Administrations

Batman Governorate and Batman Municipality are important stakeholders in relation to local coordination, public communication, infrastructure, emergency response, traffic and road-related matters and other community-level issues associated with Project implementation.

Environmental Authorities

The Ministry of Environment, Urbanization and Climate Change and the Batman Provincial Directorate of Environment, Urbanization and Climate Change are stakeholders in relation to the national EIA process, environmental permitting and compliance, waste management, environmental monitoring and other applicable environmental requirements.

Energy Authorities and Grid Institutions

The Ministry of Energy and Natural Resources, Energy Market Regulatory Authority ("EMRA"), Turkish Electricity Transmission Corporation ("TEİAŞ") and Dicle Electricity Distribution Inc. ("DEDAŞ"), as applicable to their respective mandates, are stakeholders in relation to energy licensing, grid connection, electrical infrastructure, technical compliance and operational coordination.



Agriculture and Livestock Authorities

The Ministry of Agriculture and Forestry and the Batman Provincial Directorate of Agriculture and Forestry are relevant stakeholders in relation to agricultural land use, rural livelihoods, livestock activities and potential Project interactions with agricultural land and land users.

Health, Safety and Emergency Response Institutions

The Batman Provincial Directorate of Health, Batman Provincial Directorate of Disaster and Emergency (“AFAD”), Batman Municipality Fire Department and 112 Emergency Health Services are stakeholders in relation to emergency preparedness and response, fire and electrical risks, traffic accidents, natural hazards and community health and safety.

This is particularly relevant to emergency preparedness associated with the BESS and other electrical infrastructure of the Project.

Cultural Heritage Authorities

The Ministry of Culture and Tourism, Batman Provincial Directorate of Culture and Tourism and the Diyarbakır Cultural Heritage Preservation Regional Board Directorate are relevant stakeholders in relation to cultural heritage protection and the management of any chance finds that may occur during ground-disturbing construction activities.

Civil Society Organizations and Professional Organizations

Local and national civil society organizations and professional organizations active in environmental protection, social and rural development, agriculture, livestock, gender equality and other relevant areas may have an interest in the environmental and social performance of the Project. Such organizations may also provide useful perspectives regarding vulnerable groups, livelihood impacts and community concerns.

Educational and Academic Institutions

Educational and academic institutions in Batman, particularly Batman University, may constitute interested stakeholders in relation to renewable energy, environmental and social awareness, sustainability, local development and, where relevant, community information, awareness-raising and knowledge-sharing activities.

Local Businesses and Service Providers

Local suppliers, transportation companies, food and catering service providers, maintenance companies and other businesses operating in Batman and within the Project’s social Aol may



benefit from Project-related procurement and service opportunities. Where feasible and consistent with Project procurement requirements, local procurement may contribute to local economic benefits.

Road Users

Road users along the Project access routes and ETL construction areas may be temporarily affected by construction traffic, transportation of equipment and materials, temporary traffic arrangements and access restrictions. Appropriate advance information and community health and safety measures will be implemented where Project activities may affect road use.

Lenders and Financial Institutions

Lenders and financing institutions are Other Interested Parties due to their environmental and social requirements and their role in monitoring the Project's environmental and social performance. Their areas of interest may include stakeholder engagement and information disclosure, grievance management, labor and working conditions, community health and safety, land acquisition and livelihood restoration, management of historical land-related impacts, biodiversity and contractor management.

Implementation of this SEP, together with the findings and actions arising from the LRP and Ex-Post Social Audit, will form part of the Project's overall environmental and social management and monitoring framework.

Media and Wider Public

Local and regional media and the wider public may have an interest in the Project due to its renewable energy and energy storage components, potential local environmental and social impacts, employment and procurement opportunities and community relations. Project-related information will be communicated accurately and transparently through appropriate disclosure channels, where public disclosure is required..

3.4 Vulnerable/Disadvantaged People and Groups

For the purposes of this SEP, vulnerable and disadvantaged people and groups are defined as individuals, households or community groups who may be more likely to experience disproportionate adverse effects from the Project or who may have limited capacity to access Project-related information, participate effectively in consultation activities, benefit from Project opportunities or use the Project grievance mechanism. Vulnerability may arise from factors such as age, disability, gender, household structure, income level, unemployment, social



isolation, limited mobility, limited access to communication channels, dependence on land-based livelihoods or a combination of these factors.

Within the Project's social Area of Influence, vulnerable and disadvantaged groups may include elderly persons, persons with disabilities, female-headed households, low-income households, unemployed persons and households with limited or vulnerable livelihood alternatives. Particular attention will also be given to persons whose livelihoods depend on agricultural land, livestock activities or other land-based resources where these activities may potentially interact with the Project Area or the Electrical Transmission Line route.

Settlement-level information on vulnerable and disadvantaged groups has been considered for Çayüstü, Recepler, Karayün and İrmi Neighborhoods. According to the information provided by the mukhtars, Çayüstü Neighborhood includes seven female-headed households, two low-income households and three persons aged 70 and above living alone. No persons with disabilities or unemployed persons were reported. Recepler Neighborhood includes two female-headed households, 10 low-income households, no persons aged 70 and above living alone, one person with disabilities and 10 unemployed persons. Karayün Neighborhood includes 17 female-headed households, 10 low-income households, 23 persons aged 70 and above living alone, seven persons with disabilities and 20 unemployed persons. İrmi Neighborhood includes 25 female-headed households, 70 low-income households, 10 persons aged 70 and above living alone, 100 persons with disabilities and 10 unemployed persons. These figures are based on mukhtar statements and will be verified and updated, where necessary, through further stakeholder consultations, social field studies and information obtained from other relevant sources.

The identification of vulnerable and disadvantaged people will not be limited to the categories listed above. Vulnerability will be assessed considering the specific circumstances of potentially affected persons, the nature and extent of Project-related impacts and their capacity to cope with or recover from such impacts. Particular consideration will be given to cases where multiple vulnerability factors overlap, such as elderly persons or persons with disabilities living in low-income households or households that depend on land-based livelihood activities potentially affected by the Project.

Landowners, land users and persons dependent on land-based livelihoods may also experience different degrees of vulnerability in relation to Project-related land requirements. Households whose income or subsistence depends substantially on agricultural land, livestock activities or other land-based resources may be more sensitive to temporary or permanent



land-use restrictions, access limitations or impacts on productive assets associated with the Project Area and the ETL.

The Livelihood Restoration Plan (“LRP”) to be prepared for the Project will further assess Project-related impacts on livelihoods and identify affected persons and households requiring livelihood restoration measures, where applicable. Vulnerability will be considered in the assessment of livelihood impacts and in the development of appropriate livelihood restoration measures, with particular attention given to affected persons who may have limited capacity to restore their livelihoods without additional support.

In addition, the Ex-Post Social Audit will assess historical land acquisition and land-related processes and identify any outstanding gaps, legacy issues or affected persons requiring further action. Where the Ex-Post Social Audit identifies vulnerable or disadvantaged persons affected by historical land acquisition, land-use restrictions or livelihood impacts, these persons will be incorporated into the Project’s stakeholder engagement process and, where applicable, relevant corrective and livelihood restoration measures.

Women, particularly those in female-headed households, may experience additional barriers to accessing Project information, participating in consultation activities or benefiting from employment and other Project-related opportunities. Consultation activities will therefore be organized, where necessary, in a manner that facilitates women’s meaningful participation and ensures that Project information reaches female stakeholders rather than relying solely on communication through male household or community representatives. Grievances related to discrimination, harassment, Sexual Exploitation and Abuse/Sexual Harassment (“SEA/SH”) or other sensitive matters will be handled confidentially through appropriate procedures that protect the privacy, safety and dignity of complainants and prevent retaliation.

Elderly persons and persons with disabilities may experience mobility, accessibility or communication barriers that limit their ability to attend meetings, access written information or use digital communication channels. Project information will therefore not rely exclusively on online or written disclosure. Where necessary, information will also be communicated through mukhtars, face-to-face engagement, local meetings, notice boards, telephone communication or other locally accessible methods. Appropriate assistance and understandable verbal explanations will be provided where needed, particularly regarding construction schedules, access restrictions, traffic arrangements, potential Project impacts, emergency arrangements and grievance channels.



Low-income households and unemployed persons may be particularly sensitive to changes in local economic conditions and livelihood opportunities, while they may also potentially benefit from temporary employment and local procurement opportunities generated by the Project. Available employment opportunities will be communicated transparently and in an accessible manner. Recruitment will be based on the qualifications required for each position and the principles of equal opportunity and non-discrimination. The Project and its contractors will avoid creating unrealistic expectations regarding the number, duration or type of employment opportunities available.

Households whose livelihoods depend on agricultural activities, livestock or other land-based resources may require particular attention where Project-related land requirements, ETL construction activities, access arrangements or land-use restrictions affect their ability to continue these activities. Engagement with potentially affected livelihood users will therefore include direct consultation, where appropriate, rather than relying solely on community-level engagement. Potential impacts on land access, crops, productive assets and livelihood activities will be identified and addressed through the applicable land acquisition and livelihood restoration processes.

The Project grievance mechanism will be accessible to vulnerable and disadvantaged individuals and groups. Grievances may be submitted through available channels, including Project representatives, mukhtars, telephone, e-mail, written submissions and other communication channels established by the Project. Anonymous grievances will also be accepted. Vulnerable individuals will be able to raise concerns without fear of retaliation, intimidation or discrimination, and reasonable assistance will be provided, where necessary, to persons who experience difficulties in preparing or submitting a grievance. Concerns related to land access, land or asset impacts, livelihood impacts, employment, discrimination, harassment, community health and safety, traffic, contractor behavior or other Project-related matters will be recorded, assessed and addressed in accordance with the Project grievance mechanism.

Throughout the Project lifecycle, particular attention will be given to the effective participation of vulnerable and disadvantaged people and groups. Engagement methods will be adapted, where necessary, to their specific circumstances and communication needs. The identification and assessment of vulnerable groups will be reviewed and updated as additional information becomes available through stakeholder consultations, social field studies, the LRP, the Ex-Post Social Audit, grievance records, field observations and engagement with mukhtars and other stakeholders..



4 PREVIOUSLY CARRIED OUT CONSULTATION ACTIVITIES AND OUTCOMES

4.1 Early Engagement

Stakeholder consultation activities were conducted to obtain information on the socioeconomic characteristics of the settlements within the Project's area of influence, identify community views and concerns, assess potential Project-related impacts and understand working conditions at the Project site and EGESA's Ankara office. The consultation process included telephone interviews with the mukhtars of Çayüstü, İrmi, Karayün and Recepler neighbourhoods, one household interview and face-to-face interviews with Project site and office employees.

On 20 August 2026, face-to-face interviews were conducted with two male blue-collar employees working at the Project site. A telephone consultation was also held with the Mukhtar of Çayüstü Neighbourhood on the same date. The mukhtars of İrmi, Karayün and Recepler neighbourhoods were also consulted by telephone. On 28 August 2026, face-to-face interviews were conducted with four white-collar employees at EGESA's Ankara office, comprising two women and two men.

The consultations focused on population and household characteristics, vulnerable groups, livelihood sources, average income levels, local employment, communication with the Project Company, perceived Project impacts, community grievances, livestock activities and livestock passage routes. Employee consultations covered working hours, rest periods, meal arrangements, transportation, wage payments, additional benefits, occupational health and safety training and internal grievance practices.

The consultations indicated that no significant adverse Project-related impact or grievance had been experienced by the consulted neighbourhoods. However, communication with the Project Company differs between settlements. While the Mukhtar of Çayüstü described communication as regular and effective, the mukhtars of İrmi, Karayün and Recepler stated that there had been no regular communication with the Project Company. Continued engagement with these neighbourhoods will therefore be important, particularly before construction of the energy transmission line ("ETL") and any related land access activities commence.

Çayüstü Neighbourhood has a population of approximately 300 people and 47 households. Two poor households, three persons aged 70 and above living alone and seven female-



headed households were reported. No persons with disabilities or unemployed persons were reported. According to the Mukhtar, two residents of the neighbourhood are employed by the Project.

The main livelihood sources in Çayüstü are livestock breeding and retirement pensions. Eight households reportedly engage in livestock activities, while the remaining households primarily depend on retirement pensions. The average monthly household income was reported as approximately TRY 35,000. Communication with the Project Company was described as regular and effective. No adverse Project-related impact or grievance was reported.

İrmi Neighbourhood has a population of approximately 2,000 people and 400 households. The settlement reportedly includes 70 poor households, 100 persons with disabilities, 10 unemployed persons, 10 persons aged 70 and above living alone and 25 female-headed households. Two residents of the neighbourhood are reportedly employed by the Project.

The main livelihood sources in İrmi are salaried employment and retirement pensions, and the average monthly household income was reported as approximately TRY 35,000. The Mukhtar stated that there had been no regular communication with the Project Company. Nevertheless, no adverse Project-related impact or grievance was reported.

The Mukhtar of İrmi recommended that particular attention be paid to livestock passage routes during ETL works. This represents an important prospective issue, even though no existing adverse impact has been identified. Livestock routes and access arrangements should therefore be verified before ETL construction begins. Where a livestock passage route may be affected, uninterrupted access or a safe temporary alternative should be provided in consultation with local users.

Karayün Neighbourhood has a population of approximately 1,000 people and 200 households. Ten poor households, seven persons with disabilities, 20 unemployed persons, 23 persons aged 70 and above living alone and 17 female-headed households were reported. Two residents of the neighbourhood are reportedly employed by the Project.

The main livelihood sources in Karayün are retirement pensions and daily wage employment. The average monthly household income was reported as approximately TRY 30,000. The Mukhtar stated that there had been no regular communication with the Project Company. No adverse Project-related impact or grievance was reported.

Recepler Neighbourhood has a population of approximately 860 people and 150 households. Ten poor households, one person with disabilities, 10 unemployed persons and two female-



headed households were reported. No person aged 70 and above living alone was identified. No resident of Recepler was reported to be employed by the Project.

The main livelihood sources in Recepler are agriculture and livestock breeding. Livestock are reportedly kept by approximately half of the households in the neighbourhood. The average monthly household income was reported as approximately TRY 45,000. The Mukhtar stated that there had been no regular communication with the Project Company. No adverse Project-related impact or grievance was reported.

The consultation findings show that retirement pensions, salaried or daily wage employment, agriculture and livestock breeding are the main livelihood sources across the four neighbourhoods. Livestock-related livelihoods are particularly relevant in Çayüstü and Recepler, while the potential use of livestock passage routes was raised in İrmi. Although no current restriction of access, loss of livelihood or adverse impact on livestock activities was reported, these issues should continue to be monitored during finalisation and construction of the ETL.

One household interview was also conducted in the Project area. The consulted household reported that construction activities had not caused any adverse impact on the household. The respondent considered the Project to provide benefits to the region and stated that they were also employed by the Project. While this feedback is positive, the findings of a single household interview are not considered representative of all households within the area of influence and should be supplemented through continued community engagement.

Worker consultations were conducted to obtain information on labour and working conditions, occupational health and safety practices and worker grievance channels. The two employees interviewed at the Project site were male blue-collar workers residing in Batman. They stated that they work for 12 hours followed by a 36-hour rest period and that guard shifts are staffed by at least two employees. The employees considered their meal breaks sufficient and stated that their salaries are paid on time.

Meals at the Project site are supplied by an external provider and were considered suitable by the interviewed employees. Both employees travel to the Project site using the company shuttle service. They also confirmed that they had received occupational health and safety training. No significant concern relating to working conditions, transportation, meals, wage payments or occupational health and safety was raised during the interviews.

The four employees interviewed at EGESA's Ankara office comprised two female and two male white-collar employees. The employees use public transportation to travel to the office, while



meals are supported through a meal card. They stated that salaries are paid regularly and on time. In addition to their salaries, employees benefit from bonus and premium payments and supplementary health insurance.

Employees at both the Project site and Ankara office stated that grievances and concerns are generally communicated verbally. Although no specific worker grievance was reported during the interviews, reliance solely on verbal communication may limit the traceability and monitoring of worker concerns. The Project should therefore ensure that verbal grievances are formally recorded and that employees have access to confidential written and, where practicable, anonymous grievance channels. Workers should also be informed about the responsible contact person, response timeframes and escalation process.

Overall, the consultations indicate that the Project is not currently associated with significant community or worker-related concerns. No adverse Project-related impact or grievance was reported by the consulted mukhtars, household or employees. Nevertheless, engagement with İrmi, Karayün and Recepler should be strengthened, livestock passage routes should be considered during ETL planning and construction, and worker grievances should be systematically documented.

Stakeholder engagement will continue throughout the Project's construction and operation phases through the Project-specific Stakeholder Engagement Plan and Grievance Mechanism. These instruments will support regular information disclosure, consultation, grievance recording and resolution, monitoring and reporting in accordance with applicable national legislation and IFC Performance Standards.



5 STAKEHOLDER ENGAGEMENT PROGRAMME AND DISCLOSURE PROCESS

5.1 Stakeholder Engagement Program

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

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

The following Table 5-1 summarizes the stakeholder engagement program in terms of:

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

In this respect, the following the stakeholder engagement program presented in Table 5-1 is developed accordingly.



Table 5-1. Stakeholder Engagement Programme

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
- Project-affected settlements and local communities (Çayüstü, Reçepeler, Karayün and İrmi) - Mukhtars and local representatives - Landowners and land users potentially affected by the ETL - Other interested parties - Local authorities	<u>Information Disclosure</u> - Purpose, scope, schedule, duration and nature of construction and operation activities, - Potential environmental and social impacts and relevant mitigation measures, - Information on construction activities, traffic, access arrangements and potential temporary disturbances, - Disclosure of the Grievance Mechanism, - Information on environmental and social monitoring activities and relevant results, - Disclosure of relevant Project information and documents through appropriate communication channels.	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	Social Expert
- Project-affected settlements and local communities - Mukhtars and local representatives - Landowners and land users potentially affected by the ETL - Other interested parties	<u>External Grievance Mechanism</u> - Disclosure of the Project Grievance Mechanism and available grievance channels, - Information on the grievance submission and resolution process, - Communication of grievance outcomes to complainants, as appropriate, while maintaining confidentiality.	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	Social Expert



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
- Local businesses and service providers - Project-affected settlements and mukhtars - Local communities - Project workers	<u>Employment and Procurement Strategies</u> - Recruitment of employees, - Training of staff, - Procurement of supplies and services.	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	Social Expert
- Project-affected settlements and local communities - Mukhtars and local representatives - Local authorities - Health, safety and emergency response institutions - Project workers and contractors	<u>Use of Emergency Response and Preparedness</u> - Provision of information on emergency preparedness and response arrangements relevant to communities, - Provision of information on potential fire, electrical and other emergency risks associated with the SPP, BESS and ETL, as applicable, - Coordination with relevant emergency response institutions, - Awareness-raising on emergency communication and response arrangements..	Drills Workshops Community meetings	Annual drills or as required	OHS Expert
- NGOs and civil society organizations - Educational and academic institutions, including Batman University	<u>Social progress, economic and social development, and environmental protection</u> Provision of information on: - Mitigation measures for potential environmental and social risks, - Sustainability and environmental protection measures, - Project-related social and community initiatives, where applicable, - Environmental and social performance of the Project.	Focus group meetings Workshops Company website	As required / As requested	Social Expert



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
- Project-affected settlements and local communities - Mukhtars and local representatives	<u>Management of environmental and social risks of The Project</u> Provision of information on: 1. Environmental and social monitoring activities, 2. Relevant monitoring results, 3. General information on the progress of the Project, 4. Construction-related dust, noise, traffic and access impacts, 5. Community health and safety measures.	Meetings with Mukhtars Brochures Workshops	As required / As requested	Social Expert
Vulnerable / Disadvantaged Groups	<u>Employment and any other interest of vulnerable groups</u> Provision of information on: 1. Available employment opportunities and recruitment principles, 2. Project activities and potential environmental and social impacts, 3. Construction traffic and temporary access arrangements, 4. Community health and safety, 5. Available grievance channels, 6. Other Project-related issues relevant to identified vulnerable groups.	Meetings targeting any identified vulnerable groups Women meetings and focus group discussions	Meetings during the installation and operation As requested / as required for other meetings	Social Expert
- Workforce - All affected settlements and mukhtars - Local industries - Local government	<u>Community Health</u> 1. Training of employees and contractors on appropriate conduct and interaction with local communities, 2. Information on construction traffic, transportation activities and road safety, 3. Awareness-raising regarding electrical hazards, restricted areas and other Project-related community health and safety risks, 4. Information on emergency preparedness and communication channels.	Face to face meetings Dependent on stakeholder classification	At least annually face to face meetings As requested / as needed for others	Social Expert
- Employees of The Project - Project Contactor employees	<u>Employee welfare</u> Provision of information on: 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures,	Face to face interview OHS Committee Labor audits	Monthly or when required due to the results of grievance mechanism	Social Expert



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
	4. Contractor management.			



5.2 Tools & Methods for Information Disclosure

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

5.2.1 Internal / Web Site

The Company maintains a website in Turkish and English. This website contains information about the company, sustainability, company activities and contact information. The main page of the website will contain links to the Company Website: <https://www.ronesansenerji.com>

However, there is no project specific website. A project-specific website is necessary for the Project to provide transparent information materials to affected communities and stakeholders in a consistent and timely manner.

5.2.2 Information Sheets

Information sheets of The Project, key project issues and details regarding The Project's approach to minimizing, mitigating, and managing potential impacts will be prepared and made available on The Project websites. The copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

5.2.3 Responding to Local Communities and Publications for People

Authorities of The Project will give full and timely responses to requests, comments, and questions of local communities in addition to implementing the grievance procedure in the case of complaints. All requests shall be treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

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

5.2.4 Disclosure Activities

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



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

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. The Project will inform the public via meetings, media, and other similar means, about how people can access Project related documents (such as this SEP and grievance mechanism procedure) and The Project timetable, and how they can submit comments regarding said documents.

6 PROJECT GRIEVANCE MECHANISM

This section outlines the grievance mechanism established for the Project to manage concerns, requests and complaints raised by internal and external stakeholders throughout the construction and operation phases. The grievance mechanism aims to ensure that feedback, complaints and disputes related to the Project's environmental and social performance are received, recorded, assessed and resolved in a timely, transparent, accessible and culturally appropriate manner.



The grievance mechanism is an integral part of the Project's stakeholder engagement approach. It provides a structured channel for local communities, mukhtars, land users, livestock owners, road users, workers, contractors, public institutions and other stakeholders to communicate concerns related to Project activities. These may include, but are not limited to, construction traffic, access roads, land use, informal grazing, forest areas, noise, dust, community health and safety, worker health and safety, employment, contractor behavior, gender-related concerns and environmental management issues.

The mechanism will be implemented in line with national legislation and the international environmental and social standards applicable to the Project, including the IFC Performance Standards, the World Bank Environmental and Social Framework (ESF) and relevant Environmental and Social Standards (ESSs), and the applicable Environmental and Social Performance Requirements of the Caribbean Development Bank (CDB). The grievance mechanism will also support the Project's commitments to meaningful stakeholder engagement, accessibility, non-discrimination, non-retaliation, confidentiality and continuous improvement. The grievance mechanism will also support the Project's commitments on meaningful stakeholder engagement, non-retaliation, confidentiality, equal access and continuous improvement.

The grievance mechanism will be available to both external stakeholders and internal stakeholders. External stakeholders may include local communities, mukhtars, livestock owners, land users, local businesses, public authorities, civil society organizations and other interested parties. Internal stakeholders may include direct employees, contractor and subcontractor workers, security personnel and other service providers working for or on behalf of the Project.

All grievances will be managed through a defined process including receipt, registration, initial assessment, investigation, identification of corrective actions, response to the complainant, implementation of agreed actions and close-out. Anonymous grievances will be accepted where practicable, and all grievances will be handled without retaliation, discrimination or intimidation. Grievances involving sensitive issues such as harassment, discrimination, gender-based violence, sexual exploitation and abuse or sexual harassment will be managed confidentially and through appropriate channels.

The grievance mechanism does not prevent stakeholders from using available administrative, judicial or legal remedies. It is intended to provide an accessible Project-level process for resolving concerns as early and effectively as possible. Grievance records, corrective actions



and close-out status will be monitored and reported as part of the Project's environmental and social management and stakeholder engagement activities.

6.1 Overview

The grievance mechanism established under the Project aims to provide a fair, accessible, and transparent platform for all stakeholders including project-affected individuals, communities, workers, contractors, and other interested parties to express their concerns, complaints, or suggestions related to the Project's activities. This mechanism ensures that grievances are received, acknowledged, and addressed promptly and equitably, fostering trust and accountability throughout the Project's lifecycle.

The grievance mechanism consists of two main components:

- Internal Grievance Mechanism, for issues raised by workers, contractors, and suppliers;
- External Grievance Mechanism, for community members and external stakeholders.

Both components are coordinated by the Social Expert, OHS Expert, and Environmental Expert, under the supervision of the Project Implementation Unit (PIU). The mechanism is designed to operate continuously throughout the construction and operation phases of the Project.

This grievance system is detailed in the Grievance Mechanism Procedure (EGESA-PRC-SOC-GMP-001), which provides the operational framework for grievance intake, evaluation, resolution, and monitoring in alignment with the Project's Environmental and Social Management System.

6.2 Grievance and Feedback Procedure

As Grievances and feedback refer to complaints, suggestions, requests, or concerns raised by individuals or groups who may be affected directly or indirectly by the Project's activities. The grievance mechanism provides a structured and transparent framework for receiving, recording, evaluating, and resolving such concerns in a timely and respectful manner.

Grievances may relate to a wide range of issues, including but not limited to:

- Working conditions and worker rights,
- Occupational health and safety (OHS),
- Environmental impacts (e.g., dust, noise, waste),
- Community health and safety,



- Land use, traffic disruption, or other construction-related disturbances,
- Misconduct or unethical behavior by personnel or contractors.
- The grievance process applies to:
 - Internal stakeholders, including employees, subcontractors, and suppliers;
 - External stakeholders, such as community members, non-governmental organizations (NGOs), and local authorities.

The grievance procedure is coordinated by the Social Expert, which acts as the main point of contact and facilitator between stakeholders and the Project. Grievances can be submitted in various ways, such as:

- Filling out grievance forms (available both online and on-site),
- Using grievance/suggestion boxes at project sites,
- Sending an email or making a phone call,
- Submitting complaints during community meetings or directly to the PIU.

Anonymous submissions are accepted and processed with the same diligence, though providing contact details is encouraged to enable timely feedback.

Each grievance received is:

- Registered in the Grievance Database;
- Assessed by the Social Expert in collaboration with relevant departments (e.g., Social, OHS, Environmental);
- Addressed through appropriate corrective actions;
- Closed once the resolution is implemented and documented;
- Monitored to ensure follow-up and stakeholder satisfaction.

The process ensures acknowledgement of receipt within 5 working days, and resolution if feasible within 30 calendar days.

6.2.1 Principles of the Grievance Mechanism

The grievance mechanism is developed to cover the following:

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



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

6.2.2 External Grievance Mechanism

The External Grievance Mechanism provides community stakeholders a transparent process to raise concerns related to the Project. Stakeholders are informed about the grievance mechanism during engagement meetings, including the locations of grievance/suggestion forms available both online and at designated physical points. The PIU oversees the collection, registration, and resolution of external grievances, ensuring the same timelines and standards are applied as in the internal mechanism.

Regular feedback and updates are provided to stakeholders who have identified themselves, ensuring transparency and trust. Continuous monitoring and periodic reviews of the grievance mechanism and the SEP are conducted to align the process with stakeholder expectations and maintain The Project's social license to operate. This dual approach fosters meaningful relationships with employees and external stakeholders, ensuring grievances are effectively addressed and resolved.

6.2.3 Internal Grievance Mechanism

The Internal Grievance Mechanism ensures that employees, contractors, and suppliers have a structured process to raise and resolve their concerns. All employees are informed about the grievance mechanism during recruitment and induction training sessions, which also include details about stakeholder engagement. The process is regularly reinforced through toolbox trainings. Grievance/suggestion boxes are placed at project site offices, and employees are informed about their locations and the methods for submitting grievances, which can also be done via The Project website. Managers are equipped with knowledge of the procedures, and details are made easily accessible, such as in employee handbooks or through visual guides in common areas.



Grievances are managed by the PIU, who logs the complaints in the grievance database and collaborates with relevant departments to investigate and evaluate the issues. The complainant is informed within five days that the grievance process has begun, and a resolution is communicated within 30 days. Anonymous grievances are considered, although priority is given to named submissions to ensure efficient resolution. Once actions are implemented and documentation is complete, the grievance is officially closed.

6.2.4 Collection, Registration and Evaluation of Grievances

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

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

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

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

6.2.5 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 days of grievance receipt.



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

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

6.2.6 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

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

For the collection of internal grievances from community:

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



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

6.3 Grievance Mechanism Channels

Table 6-1. Details of Contacts

EGESA	Contact Person
Website: info@egesa.com.tr Address: Kızılırmak Mah. Dumlupınar Bul. No: 3, Next Level Ofis A Blok, D: 80-81, Kat 16, Çankaya, ANKARA/TÜRKİYE Phone: +90 (312) 496-4096	To be determined.

In addition to this grievance mechanism, the residents and/or Project stakeholders can apply to “TKYB’s existing grievance mechanism” and national-level grievance mechanisms such as CİMER and YİMER.

TKYB’s Environmental Grievance Mechanism: Any parties directly and/or significantly affected by environmental impacts arising from the TKYB’s operational or financial activities can submit a grievance to the TKYB. Grievances are systematically archived and promptly handled. The online form available on the contact webpage of TKYB (can be filled. Also, the phone number and physical address of the general directorate of TKYB is given as:

- www.kalkinma.com.tr
- Online grievance /suggestion form: <https://kalkinma.com.tr/en/contact-us/contact-information>
- Phone number: +90 216 636 87 00
- Fax number: +90 216 636 89 28
- E-mail address: haberlesme@kalkinma.com.tr
- Physical address: Saray mahallesi. Dr. Adnan Büyükdeniz caddesi. No:10 34768 Ümraniye/İstanbul/Türkiye



Presidency's Communication Center: The Presidency's Communication Centre (CİMER) has been providing a centralized grievance system for Turkish citizens, legal persons and foreigners. CİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

- www.cimer.gov.tr
- Call Centre: 150
- Phone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates.

Foreigners Communication Center: The Foreigners Communication Center (YİMER) has been providing a centralized grievance system for foreigners. YİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

- www.yimer.gov.tr
- Call Centre: 157
- Phone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the Republic of Türkiye General Directorate of Migration Management.

7 RESOURCES AND ROLES&RESPONSIBILITIES

The main duties and responsibilities of the Project for the implementation of this plan on behalf of the Project Owner and the Subcontractor(s) of the Project are summarized below.



Table 7-1. Roles and Responsibilities

Roles	Responsibilities
Project Management	○ Ensures this SEP will be implemented during the lifetime of The Project, ○ Providing the necessary resources for the approval and implementation of this Plan, ○ Coordinate with parties for proper implementation of this Plan,



Roles	Responsibilities
Social Expert	○ Coordinates with parties for proper implementation of this SEP, ○ Providing necessary resources for the implementation of the grievance mechanism procedure, ○ Ensures national and international legislations / guidelines which are applicable to The Project activities are identified and tracked, ○ Records all formal and informal engagement activities with local communities in stakeholder management system, ○ Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports, ○ Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, ○ Forms relationships with The Project stakeholders, ○ Organizes stakeholder meetings to collect the responses to grievances actively as required, ○ Provides regular reporting back to the community on the management related to community grievances, ○ Determines and provides the necessary training materials for employees, ○ Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.), ○ Shows best efforts to resolve all complaints in one month, ○ Searches the causes of the grievance and the social incidents that cause, injuries, delays or stoppage in the work and disputes among The Project and communities, ○ Monitors all complaints and ensures that all complaints are resolved and closed, ○ Follows the results of complaint and report on a monthly, and annual basis, ○ Records and reports general and local employment rates and complaints, which are received or observed verbally, ○ Filling out the “Complaint Register Form & Consultation Form” (see Annex A: Complaint Register Form and Annex B: Consultation Form), ○ Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed), ○ Implement the Environmental and Social Management Systems developed for SEP and The Project.



Roles	Responsibilities
OHS Expert	- Supports Social Expert on the first evaluation of grievances collected, - Supports Social Expert for recording all formal and informal engagement activities, - Determines corrective measures, if necessary, - Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per The Project standards during the installation stage and to audit the performance of the Contractors. - Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, - Provides answers to the OHS related grievances raised by employees, the local community, and local institutions.
Environmental Expert	- Monitors and manages the environmental risks and impacts associated with all site execution and rehabilitation/installation activities - Ensures that contractors and subcontractors strictly comply with the Project environmental standards, mitigation measures, and international guidelines - Collaborates with the Social Expert to address and resolve any environment-related community grievances (e.g., dust, noise, water quality, waste generation) - Tracks water abstraction, wastewater generation, and waste registration across the site coordinates, compiling findings into baseline performance logs, Provides necessary technical input and training materials regarding environmental monitoring, waste classification, and pollution prevention for site personnel - Conducts regular field inspections and internal audits to confirm compliance with national legislation and lender requirements.
Contractor(s) / Subcontractor(s)	- To ensure that relevant activities are carried out in accordance with this Management Plan and relevant procedures, - Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence, - Follows the rules listed in this SEP and other relevant management system documentation of The Project. - Complying with the requirements and standards of the grievance mechanism procedure.

8 MONITORING AND REPORTING

8.1 Key Monitoring Activities

The Project will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide



input on the management and monitoring of the overall environment, health, and safety (labor rights) and social performance of The Project mainly through:

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

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

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

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

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are set out in Table 8-1.

Table 8-1. Key monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	Project Company will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include: ● number of outstanding complaints and grievances opened in a month, ● number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), ● number of complaints grievances closed in the month; and ● type of grievance.	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office



Topic	Indicator	Method	Periodicity	Location
Community Engagement Activities	Social Expert will record formal and informal engagement with local communities.	Community Engagement Records (see Annex B: Consultation Form)	Monthly	Site office
Disclosure Materials and Feedback to Communities	Social Expert will keep records of the types of leaflets, brochures, newsletters prepared and distributed. Social Expert will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	Social Expert will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Annually	Site office

8.2 Key Performance Indicators (KPIs)

The key performance indicators ("KPI"s) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KPIs are given in Table 8-2 below.

Table 8-2. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measures
Total number of external complaints or grievances	Total number reduced year on year	Grievance Database
Total number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Total number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Respond stakeholders within 5 days at last / delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Monthly reports
% of all complaints (internal, external, customer) that are closed within 30 days.	Target of 100%	Grievance Database



KPI	Target	Monitoring Measures
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (installation), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report
% item of Social Responsibility Program that implemented	Target of 80%	Annual reports



8.3 Internal and External Auditing

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

8.4 Record Keeping and Reporting

Record keeping will be done during the following cases:

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

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

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

8.1 Induction Training

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



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

8.1 Job Specific and Other Training Requirements

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

ANNEXES

Annex A – Complaint Register Form

Annex B – Consultation Form

Annex C – Grievance Database

Annex D – Grievance Closure Form

Annex E – Consultation Log

Annex F – Consultation Photographs



Annex A: Complaint Register Form

Full Name	
Contact Information	By Post: Please provide mailing address.
Please identify how you wish to be contacted (mail, telephone, e-mail)	By telephone: By e-mail:
Preferred language of communication?	Turkish Other.....
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only Grievance received by: Date: Reference number:	



Annex B: Consultation Form

İSTİŞARE KAYIT FORMU				
Consultation Form				
Formu Dolduran Kişi Person Filling Out the Form		Tarih Date		
Toplantı Gündemi Meeting Agenda		Görüşme Kayıt No Consultation Register Number		
1- Toplantı Bilgileri Meeting Information				
Yetkili Kişinin Adı Name of Authorized Person			İletişim Şekli Type of Communication	
İstişare Edilen Kurum Institution Consulted			☐ Yüz Yüze Face-to-Face	
Telefon/E-posta Phone/Email			☐ Telefon Phone	
Köy-Mahalle/İlçe/İl Village/District/Province			☐ Diğer Other	
Paydaş Tipi Type of Stakeholder				
☐ Kamu Kurumu Public Institution	☐ PEK PAP	☐ STK Association/NGO	☐ İlgili Grup Related Group	☐ Oda/Meslek Birlikleri Chamber/Professional Body
☐ Yüklenici/Alt Yüklenici Contractor/Subcontractor	☐ İşçi Sendikası Labour Union	☐ Medya Media	☐ Üniversite University	☐ Diğer Other
2- İstişare Detayları Details of the Consultation				
Konu Subject				



Geri Bildirim

Feedback

Not

Note



Annex C: Grievance Database

[illegible]



Annex D: Grievance Closure Form

Name of the Recorder:		
Date of Register:		/...../.....
GRIEVANCE/REQUEST CLOSURE		
In this section of the Closing Form, information on how the grievance was resolved or how the request was met will be included; if there is an expenditure made, its information will be entered; an explanation that the grievance/request is agreed with the grievance/request owner will be written and signed by grievance or request owner and the relevant Client employee and closed. (For grievances received over the Internet, an e-mail response will be expected instead of a signature)		
Actions Taken for Grievance/Request		Relevant Departments /Contractors/ Subcontractors
1-		
2-		
3-		
4-		
Amount of Expenditure:		
Grievance/Requestor Name and Surname		On behalf of Client Title-Name-Surname and Signature

**Annex E: Consultation Log**

Stakeholder Type	Institution Consulted	Stakeholder	Gender	Phone	Communication Channel	Date	Agenda Of the Meeting	Number Of Stakeholders Engaged	Team	Person Filling Out the Form	Details Of the Consultation

