

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

Batman Province / Central District

**Grievance Mechanism Procedure
(Plan No: EGESA-PRC-SOC-GMP-001)**



Project Information

Project	Details
Name	Batman-2 Solar Power Plant Project with Battery Energy Storage, having an Installed Capacity of 30 MWp / 20 MWe and an Electricity Storage Capacity of 20 MWh ("Project") Grievance Mechanism Procedure ("GMP")
Submitted to	Development and Investment Bank of Turkey (TKYB)
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)

Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery
Development and Investment Bank of Turkey	Mehtap ALTUĞ	Rev00	31.08.2026	e-mail: PDF
EGESA Electricity Construction Energy Generation Inc.	Esma Nur Çeltikçi	Rev00	31.08.2026	e-mail: PDF

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



Table of Content

Tables.....	iv
Figures	iv
Abbreviations	v
1 INTRODUCTION.....	1
1.1 Project Background.....	1
1.2 Scope	2
1.3 Purpose	3
1.4 Definitions	4
1.5 Key Principles	4
2 ROLES AND RESPONSIBILITIES	5
3 PROJECT STANDARDS	6
3.1 Turkish Standards and Requirements	6
3.2 Environmental and Social Risk Management of TKYB	9
3.3 Applicable International Standards and Guidelines	9
3.3.1 IFC Performance Standards	10
3.3.2 World Bank Environmental and Social Standards.....	11
3.3.3 CDB Environmental and Social Standards.....	13
3.3.4 Other Relevant International Good Practice Requirements	15
4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT	15
4.1 Internal (Worker) Grievance Management Process.....	15
4.1.1 Existing Worker Grievance Channels in Use	17
4.1.2 Implementation and Updates of the Procedure	17
4.2 External Grievance Management Process	18
4.2.1 Receiving Grievances	19
4.2.2 Assessment and Investigation of Grievances.....	20
4.2.3 Feedback to Stakeholder	20
4.2.4 Propose Resolution/Corrective Action	20
4.2.5 Close-Out of Grievances	21
4.2.6 Non-Resolution Case	21
4.3 Other Grievance Mechanisms.....	21
5 MONITORING.....	22
5.1 Overview of Monitoring Requirements	22
5.2 Key Monitoring Activities	22
5.3 Key Performance Indicators (KPIs)	23
6 TRAINING.....	24
6.1 Induction Training	24



6.2	Job Specific and Other Training Requirements	24
7	AUDIT AND REPORTING	25
7.1	Internal and External Auditing	25
7.2	Record Keeping and Reporting	25
ANNEXES		26
	Annex A: Grievance Register Form.....	27
	Annex B: Consultation Form	28
	Annex C: Grievance Database.....	29
	Annex D: Grievance Closure From	30
	Annex E: Consultation Log.....	31



Tables

Table 2-1. Roles and Responsibilities..... 5

Table 4-1 Details of Contacts 19

Table 5-1. Key Monitoring Measures 23

Table 5-2. Key Performance Indicators (KPIs).....24

Figures

Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement 10

Figure 4-1.Processes of Internal and External Grievance Management 15

Figure 4-2 Contact Page- I 18

Figure 4-3 Contact Page - II 19



Abbreviations

Aol	Area of Influence
CİMER	Presidency's Communication Centre
DCC	Document Control Center
EGESA	Batman 2 Renewable Electricity Generation Inc. one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc.
EIA	Environmental Impact Assessment
ESG	Environmental, Social, and Governance
ESMS	Environmental and Social Management System
GMP	Grievance Mechanism Procedure
IFC	International Finance Corporation
KPI	Key Performance Indicators
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
PIU	Project Implementation Unit
POSEİDON	POSEİDON Environmental Social Consulting Engineering Trade Ltd Co
Project Company	Batman 2 Renewable Electricity Generation Inc. one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc.
PS	Performance Standard
SEP	Stakeholder Engagement Plan
The Project	Batman-2 Solar Power Plant Project with Battary Energy Storage, having an Installed Capacity of 30 MWp / 20 MWe and an Electricity Storage Capacity of 20 MWh
TKYB	Development and Investment Bank of Türkiye / Türkiye Kalkınma ve Yatırım Bankası A.Ş.
TurkStat	Turkish Statistical Institute
YİMER	The Foreigners Communication Center



1 INTRODUCTION

This Grievance Mechanism Procedure (“GMP”) has been developed 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 (“Project”) for Batman 2 Renewable Electricity Generation Inc. (“EGESA”), one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc. The GMP emphasizes the importance of ensuring an accessible, transparent, fair and non-retaliatory process for addressing grievances, requests, concerns and feedback raised by workers, contractors, subcontractors, local communities and other external stakeholders during the construction and operation phases of the Project. It provides guidance for receiving, recording, assessing, responding to and closing grievances in an effective and timely manner, while protecting the rights and confidentiality of complainants and minimizing potential environmental, social, labor and community-related risks.

This procedure has been prepared to support the management of the Project’s environmental and social performance and to ensure alignment with the following requirements:

- National Environmental Legislation,
- TKYB Environmental and Social Policy
- IFC Performance Standards,
- World Bank Environmental and Social Standards and,
- CDP Environmental and Social Standards.

The reference number of this Procedure is **EGESA-PRC-SOC-GMP-001**. This GMP is a dynamic document and may be revised and updated throughout the Project lifecycle in line with changes in Project design, construction and operation activities, stakeholder feedback, grievance records, lender requirements and other Project-related needs. In addition, appropriate and accessible communication channels will be maintained during the construction and operation phases to ensure that stakeholders who are unable to use the website or internet can also submit their grievances adequately. These channels may include direct communication with Project representatives, written grievance forms, telephone, e-mail, grievance boxes, communication through mukhtars and other locally accessible methods.

1.1 Project Background

EGESA Elektrik İnşaat Enerji Üretim A.Ş. plans to develop the “EGESA-Batman-2 Solar Power Plant Project with Battery Energy Storage System (30 MWp / 20 MWe-20 MWh)” within the administrative boundaries of Çayüstü (Beda) Village/Neighborhood, Central (Merkez) District, Batman Province.



Historically, the project area was located within Block 138, Parcel 13 (formerly designated as Treasury-owned agricultural land / "Tarla"). Following preliminary permitting and subdivision procedures, the cadastral layout was reorganized into active parcels under Block 138. According to the official application sketches issued by the Batman Cadastre Directorate (LIHKAB), the Project footprint encompasses nine registered cadastral parcels: Parcels 78 (6,315.92 m²), 79 (136.60 m²), 80 (214,874.38 m²), 81 (55,295.59 m²), 82 (15,363.28 m²), 83 (292,102.58 m²), 84 (127,343.60 m²), 85 (63,497.16), and 86 (2,378.67 m²), corresponding to a cumulative site area of approximately 77.73 hectares (777,307.78 m²).

The project site is located approximately 11 km southeast of the Batman city center. The nearest residential receptors include the Çayüstü Cluster Houses situated approximately 290 m northeast of the Batman-2 site, and a single residential dwelling located 140 m to the east. In addition, existing TPAO oil wells are situated approximately 1,100 m to the north, and the Tigris River flows approximately 2,090 m south of the project boundary. Main logistical access to the site is provided via the Batman–Mardin State Highway (Road No. 955-11, located approx. 6 km away) and connected through the Batman Peripheral Ring Road and existing rural roads.

The facility will utilize fixed-tilt, bi-facial monocrystalline photovoltaic (PV) modules (500 Wp each) mounted on ground steel structures, string inverters (200 kWe each), concrete transformer kiosks (step-up transformers), and an integrated on-site Battery Energy Storage System (BESS) utilizing Lithium Iron Phosphate (LiFePO₄ / LFP) chemistry, designed in full compliance with the national Electricity Storage Activities Regulation and international safety standards. The grid interconnection will be established via the medium-voltage (MV) busbar of the Batman-1 Transformer Substation.

The construction and assembly phase is scheduled to take approximately 10 months (working 26 days per month, 8 hours per day), during which a workforce of 40 personnel will be employed on-site and accommodated in modular container facilities. During the operational phase, which corresponds to an economic license life of up to 49 years (with an estimated initial equipment lifespan of 25–30 years), approximately 5 permanent personnel will be employed for routine operation and maintenance (O&M) activities.

1.2 Scope

This document outlines the grievance mechanism procedure which is applied to all project employees, subcontractor employees, customers and external stakeholders. The commitment and approach of the Project are based on proper handling of complaints and suggestions that



may arise as a direct or indirect result of the environmental and social performance of the Project. GMP is not a replacement for stakeholder engagement activities. This procedure covers all the grievances raised by internal and external stakeholders, including the activities of subcontractors. GMP is a part of the management plans developed for the Project. This procedure has overlaps and cross-linkages to the Stakeholder Engagement Plan ("SEP") (EGESA-PLN-SOC-SEP-001) particularly concerning the contractor's activities.

1.3 Purpose

The purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into operations to minimize social risks. The grievance mechanism aims to ensure that all comments and complaints concerning the project, and its activities will be considered transparently, and the related measures will be taken. The processes and responsibilities of this procedure will be defined for both external stakeholders project employees and subcontractors' employees.

This document aims to identify:

- the scope of grievance mechanism procedure and the applicable management interfaces,
- the definition of roles and responsibilities,
- the applicable project standards, project commitments, operational procedures, and implementation guidance for the procedure,
- monitoring and reporting methods, including definition of Key Performance Indicators ("KPI"s),
- training requirements and references for supporting materials and information,
- the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- how to minimize community conflict by systematically addressing grievances.

During steady-state operations, this procedure will be reviewed on an annual basis to determine if there are any changes or updates required for the procedure content unless a more frequent update is required to reflect changing operations or procedures. Any requests for changes to this procedure must be addressed to the Batman 2 Renewable Electricity Generation Inc. ("EGESA"), one of the subsidiaries of EGESA Electricity Construction Energy Generation Inc. of this procedure and will be subject to appropriate review and approval processes.



1.4 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.

1.5 Key Principles

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

- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.



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

2 ROLES AND 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 2-1. Roles and Responsibilities

Roles	Responsibilities
Project Management	○ Oversees the implementation of the GMP and SEP. ○ Ensures that all responsible parties fulfill their roles regarding the grievance mechanism. ○ Provides overall supervision of the grievance resolution process. ○ Ensures allocation of necessary resources for the effective functioning of the mechanism. ○ Ensures that monthly and annual grievance reports are regularly prepared and shared.
Contractor / Subcontractor	○ Avoids making commitments to stakeholders beyond their authority during interactions. ○ Complies with the rules outlined in the GMP and other relevant project management documents. ○ Reports received grievances to the PIU within their scope of responsibility and collaborates in the resolution process. ○ Ensures that all site workers are informed about the grievance mechanism.
OHS Expert	○ Responds to grievances related to OHS raised by workers, local communities, or institutions. ○ Collaborates with the Social Expert during the initial assessment of grievances recorded under the GMP. ○ Identifies and initiates corrective actions when necessary. ○ Informs the Director of Social Expert about applicable national and international OHS legislation. ○ Identifies potential OHS risks and ensures that preventive measures are implemented.
Social Expert	○ Conducts initial assessment of grievances and initiates the resolution process. ○ Records all social interactions such as grievances, suggestions, and information meetings. ○ Organizes regular feedback meetings with the community. ○ Provides responses to grievances within 30 calendar days (for complainants who provided contact information, acknowledges receipt within 5 days and informs them that the process has started). ○ Maintains the grievance records and monitors resolution progress. ○ Responsible for the implementation of the GMP and SEP.
Environmental Expert	○ Evaluates grievances related to environmental impacts. ○ Identifies and implements necessary environmental corrective actions.



Roles	Responsibilities
	- Keeps records of environmental grievances and coordinates resolution efforts with relevant parties. - Follows applicable national and international environmental legislation and informs the Social Expert accordingly. - Monitors the environmental performance of contractors and ensures fulfillment of environmental obligations under the GMP.

3 PROJECT STANDARDS

This Grievance Mechanism Procedure (GMP) has been prepared in accordance with national and international environmental and social standards applicable to the Project. Throughout the life of the Project, the following Project Standards will be implemented:

- National Environmental Legislation,
- TKYB Environmental and Social Policy
- IFC Performance Standards,
- World Bank Environmental and Social Standards and,
- CDP Environmental and Social Standards.

3.1 Turkish Standards and Requirements

The Constitution of The Republic of Türkiye

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

X. Legal Egalitarianism

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

II. Prohibition of Forced Labor

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

VII. Freedom of Thought and Opinion



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

VIII. Freedom of Expression and Dissemination of Thought

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

VII. Right of Petition

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

Law on The Right to Information

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

Law on The Use of Right to Petition

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

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 legislation governing environmental protection and management in Türkiye is Environmental Law No. 2872, published in the Official Gazette No. 18132 dated August 11, 1983. The Environmental Impact Assessment (EIA) Regulation, published in the Official Gazette No. 31907 dated July 29, 2022, constitutes one of the key implementing regulations under the Environmental Law and sets out the principles and procedures applicable to the assessment of the potential environmental and social impacts of projects, including requirements for public participation and disclosure during the EIA process.



The Project has been subject to the national EIA process in accordance with the Environmental Law No. 2872 and the EIA Regulation, and a Final EIA Report has been prepared for the Project. The Final EIA Report includes the assessment of the Project's potential environmental and social impacts, proposed mitigation and monitoring measures, as well as the outcomes of the public participation and stakeholder engagement activities conducted as part of the EIA process.

The Project will comply with the requirements of Environmental Law No. 2872, the EIA Regulation, the commitments set out in the Final EIA Report, and other applicable national environmental legislation throughout its construction and operation phases.

3.2 Environmental and Social Risk Management of TKYB

Within The Project aligns with the Development and Investment Bank of Türkiye's (TKYB) Environmental and Social Policy, which promotes:

- Sustainable resource use and reduction of environmental footprint,
- Creation of positive environmental and social impacts,
- Minimization of risks to human health and the environment,
- Continuous improvement of environmental and social performance,
- Support for environmental awareness and volunteering initiatives.

TKYB's policy provides the foundational framework for ensuring that the Project is managed in an environmentally and socially responsible manner.

3.3 Applicable International Standards and Guidelines

The Project adheres to international standards to ensure sustainability and compliance with environmental and social principles. These standards include:

- 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.

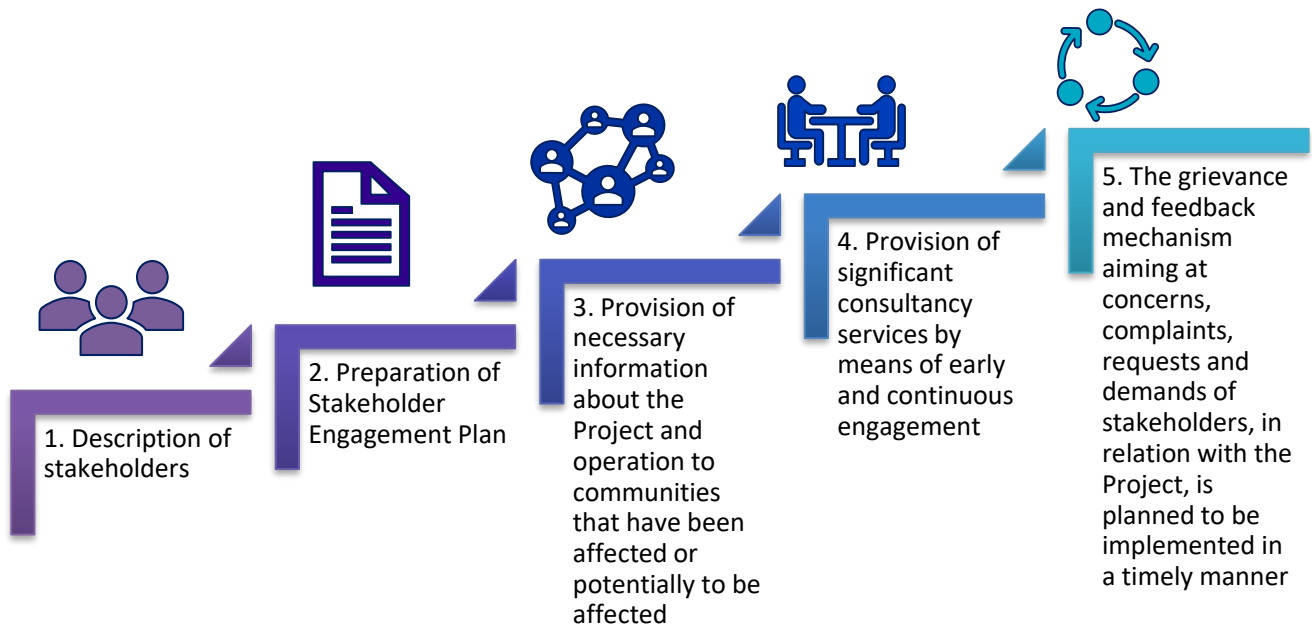


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.3.1 IFC Performance Standards

This procedure has been developed in alignment with the International Finance Corporation (IFC) Performance Standards, particularly Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts, and Performance Standard 2 (PS2): Labor and Working Conditions. The following provisions form the basis of grievance mechanism requirements to be implemented throughout the Project.

Grievance Mechanism for Affected Communities (IFC PS1)

- The Project shall establish and maintain a grievance mechanism for Affected Communities to receive and facilitate the resolution of concerns and complaints regarding the environmental and social performance of the Project.
- The mechanism must be culturally appropriate, accessible, understandable, transparent, and free of charge.
- Where applicable, differentiated measures will be adopted to enable effective access to the mechanism for vulnerable or disadvantaged groups.
- Stakeholders will be informed about the grievance mechanism early in the engagement process, including how to submit grievances and what to expect in terms of response.



- Anonymous submissions will be permitted, and the confidentiality of complainants will be respected.
- No individual or group will face retaliation, discrimination, or reprisal for submitting a grievance.
- The grievance mechanism will not impede or replace existing judicial or administrative remedies.

Grievance Mechanism for Workers (IFC PS2)

- The Project will establish and maintain a grievance mechanism for all categories of workers, including direct employees, contracted workers, and third-party workers.
- The mechanism shall be accessible, transparent, and effective, and allow for grievances to be submitted confidentially and anonymously, where desired.
- Workers will not face any form of discrimination, retaliation, or disciplinary action for raising grievances in good faith.
- The mechanism will be clearly communicated to workers upon hiring and reinforced through ongoing awareness efforts.
- Worker representatives may be involved in the grievance process, where appropriate.
- Contractors and subcontractors will either establish their own grievance mechanisms aligned with these standards or use the Project's mechanism. The Project will monitor their compliance.
- The grievance mechanism does not replace or limit access to legal remedies or mechanisms available under collective bargaining agreements.
- The mechanism will also cover core labor issues such as non-discrimination, harassment, working conditions, occupational health and safety, child and forced labor.

3.3.2 World Bank Environmental and Social Standards

This procedure has been developed in alignment with the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure, and Environmental and Social Standard 2 (ESS2): Labor and Working Conditions. The following provisions form the basis of grievance mechanism requirements to be implemented throughout the Project.

Grievance Mechanism for Project-Affected Parties (ESS10)

- The Project will establish and maintain an accessible and inclusive grievance mechanism to receive and facilitate the resolution of concerns and grievances from



Project-Affected Parties related to the environmental and social performance of the Project.

- The grievance mechanism will be proportionate to the potential risks and impacts of the Project and will be readily accessible to all Project-Affected Parties.
- The mechanism will address concerns and grievances promptly, effectively, transparently, and in a culturally appropriate manner, at no cost and without retribution to the complainant.
- The grievance mechanism will allow grievances to be submitted through different channels and will permit anonymous complaints to be raised and addressed.
- The Project will disclose information on the grievance mechanism to Project-Affected Parties, including the available channels for submitting grievances, the grievance handling process, and indicative response timeframes.
- Appropriate measures will be adopted, where necessary, to facilitate access to the grievance mechanism for disadvantaged or vulnerable individuals or groups.
- The confidentiality and privacy of complainants will be protected throughout the grievance management process, where requested or required.
- The grievance mechanism will include an appeals process where complainants are not satisfied with the proposed resolution.
- The grievance mechanism will not prevent access to judicial or administrative remedies available under applicable legislation.

Grievance Mechanism for Project Workers (ESS2)

- The Project will establish and maintain a grievance mechanism for Project workers, including direct and contracted workers, to raise workplace concerns.
- The grievance mechanism will be easily accessible to all Project workers and will be communicated to them at the time of recruitment and throughout their employment, including information on the measures in place to protect them against reprisal for its use.
- The mechanism will address workplace concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned.
- Workers will be able to raise grievances confidentially and, where appropriate, anonymously.
- Project workers will not be subject to retaliation, discrimination, disciplinary action, or any other form of reprisal for raising grievances in good faith.
- Contractors and subcontractors will be required to provide their workers with access to a grievance mechanism consistent with ESS2 requirements, either through their own



mechanism or, where applicable, through the Project-level worker grievance mechanism.

- The grievance mechanism will address workplace concerns, including working conditions, terms of employment, occupational health and safety, discrimination, harassment, and other labor-related matters.
- Specific procedures will be available for grievances of a sensitive nature, including sexual exploitation and abuse and sexual harassment (SEA/SH), ensuring confidentiality and appropriate handling.
- The worker grievance mechanism will not impede access to other judicial or administrative remedies that may be available under national law or through existing arbitration procedures.

3.3.3 CDB Environmental and Social Standards

This procedure has been developed in alignment with the Caribbean Development Bank (CDB) Environmental and Social Review Procedures, particularly Performance Requirement 5 (PR5): Directly Affected Communities, Performance Requirement 6 (PR6): Vulnerable Groups, and Performance Requirement 8 (PR8): Community, Worker Health and Safety. The following provisions form the basis of grievance mechanism requirements to be implemented throughout the Project.

Grievance Mechanism for Directly Affected Communities (PR5)

- The Project will establish and maintain an accessible grievance mechanism to receive and facilitate the resolution of concerns and grievances raised by communities directly affected by Project activities.
- The grievance mechanism will provide affected persons and communities with appropriate channels to raise concerns regarding the environmental and social risks and impacts of the Project.
- Information on the grievance mechanism, including available submission channels and the grievance handling process, will be communicated to affected communities as part of stakeholder engagement activities.
- Grievances will be addressed in a timely, transparent, fair, and culturally appropriate manner, without cost to the complainant.
- The grievance mechanism will support meaningful stakeholder engagement by ensuring that concerns raised by affected communities are appropriately recorded, assessed, responded to, and followed up.



Access to the Grievance Mechanism for Vulnerable Groups (PR6)

- The Project will ensure that disadvantaged or vulnerable individuals and groups have effective and equitable access to the grievance mechanism.
- Where necessary, differentiated measures will be adopted to address barriers that may prevent vulnerable groups from accessing or effectively using the grievance mechanism.
- Grievance communication and engagement methods will take into account the specific needs and circumstances of vulnerable stakeholders, including women, children, elderly persons, persons with disabilities, and other disadvantaged groups identified within the Project's area of influence.
- Grievances raised by vulnerable individuals or groups will be handled in a manner that respects their privacy, dignity, and specific needs and avoids discrimination or retaliation.

Grievance Mechanism for Workers and Community Health and Safety Matters (PR8)

- The Project will provide workers with access to an effective grievance mechanism through which workplace concerns, including occupational health and safety matters, working conditions, discrimination, harassment, and other labor-related issues, can be raised and addressed.
- The worker grievance mechanism will be accessible to relevant categories of Project workers, including contractor and subcontractor personnel.
- Workers will be informed about the grievance mechanism and the available channels for raising workplace concerns.
- Grievances will be handled confidentially, where appropriate, and workers will not be subject to retaliation, discrimination, or other adverse consequences for raising concerns in good faith.
- The grievance mechanism will also provide appropriate channels for communities to raise concerns related to community health and safety risks associated with Project activities.
- Contractors and subcontractors will be required to comply with the Project's grievance management requirements and to ensure that their workers have access to an appropriate grievance mechanism.



3.3.4 Other Relevant International Good Practice Requirements

The Project will also consider other relevant international good practice requirements requested by the lenders. These include principles such as accessibility, transparency, confidentiality, non-retaliation, timely response, fair assessment, documentation, monitoring and continuous improvement.

The GMP will be implemented as a living procedure and will be updated where necessary based on Project design changes, construction and operation activities, stakeholder feedback, grievance trends, lender comments, monitoring findings or changes in applicable environmental and social requirements. The Project will ensure that grievance channels remain functional, accessible and appropriate throughout the Project lifecycle.

4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

The process to be followed to resolve any grievances is described in Figure 4-1 below.

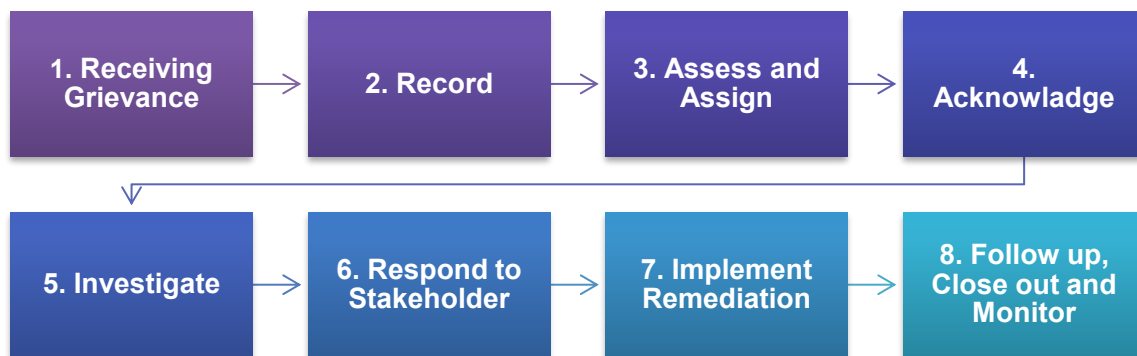


Figure 4-1. Processes of Internal and External Grievance Management

4.1 Internal (Worker) Grievance Management Process

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments, and concerns by using grievance register form (see Annex A: Grievance Register Form). Since the privacy of the complainant must be protected, grievances are collected in grievance boxes located in the rest areas of the employees. Through these forms, workers will also be able to make anonymous grievances. Information on how to express grievances, opinions and suggestions to workers will be provided during the orientation training process. Written submissions will not be used in any way to intimidate those submitting the grievances.

Management will treat the grievances seriously and take prompt, appropriate actions. The Social Expert will be responsible for recording and following up on all grievances submitted by



workers. OHS Expert will take the lead in reviewing grievances related to OHS issues and will collaborate with the Contractor/Subcontractor and Environmental Expert where relevant. The Social Expert will oversee the overall functioning of the grievance mechanism and ensure timely coordination among all responsible parties.

All grievance are evaluated and recorded in a centralized Grievance Database and Consultation Log. This database includes key information such as submission date, problem description, root cause, assigned responsible party, corrective action taken, and closure date.

Grievances are categorized by subject (e.g., meals, shuttle service, hygiene, security, etc.) to support root cause analysis and ensure thematic resolution trends are monitored.

Upon receipt of a grievance, the Social Expert will log the grievance into the grievance database. If the grievance concerns occupational health and safety, it will be shared immediately with the OHS Expert for evaluation and action. For environmental-related grievances, the Environmental Expert will be consulted. The Contractor/Subcontractor will support the resolution process within their area of responsibility.

Resolutions of grievances will be developed in accordance with relevant Turkish laws, regulations, as well as international requirements. Feedback will be provided to complainants where possible.

It is possible to extend the process for complex grievances, and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during the solution process. The Social Expert, in coordination with the relevant department (OHS, Environmental, Contractor/Subcontractor), will aim to resolve each grievance within 30 days. The Social Expert will monitor resolution timelines and overall system performance.

Complainants will receive an acknowledgment of their grievance within 5 working days, and feedback on the resolution will be shared within 30 days, where feasible.

In complex or exceptional cases, the 30-day resolution period may be extended. In such cases, the complainant will be informed about the updated timeline and the reason for the delay.

The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this procedure should be fulfilled.



4.1.1 Existing Worker Grievance Channels in Use

Existing channels are available for workers to communicate their concerns, requests, suggestions and grievances at both the Project Site and the Central Facility. During the stakeholder consultations conducted with workers, it was reported that workers are able to raise their concerns and suggestions verbally with their supervisors and/or relevant management representatives and that issues raised through these direct communication channels can generally be addressed and resolved.

At the time of the site visit, however, no dedicated suggestion and complaint boxes were available at either the Project Site or the Central Facility. During the site visit, it was recommended that suggestion and complaint boxes be installed at both locations in areas that ensure confidentiality and are outside the field of view of security cameras, thereby enabling workers to submit written grievances, concerns or suggestions without being observed. The Project Company confirmed that such boxes will be installed accordingly.

The installation of the suggestion and complaint boxes will complement, rather than replace, the existing verbal communication channels. Workers will continue to be able to communicate their grievances and concerns verbally or in writing through their direct supervisors, relevant management representatives, OHS personnel and other designated Project representatives. The additional written channel will provide workers with an alternative means of raising workplace-related concerns, particularly where they may not wish to communicate an issue directly to their supervisors or management.

Under this GMP, the existing worker grievance channels will be formalized and strengthened. All grievances received through the available channels, including the suggestion and complaint boxes following their installation, will be recorded, assessed, responded to and closed in accordance with the grievance management process defined in this Procedure. The Project Company will ensure that workers at both the Project Site and the Central Facility, including contractor and subcontractor workers, are informed about the available grievance channels and that grievances can be raised without retaliation, discrimination or intimidation.

4.1.2 Implementation and Updates of the Procedure

This procedure will be reviewed on an annual basis during steady-state operations. During steady-state operations, this procedure will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs. The revision of this procedure will be the responsibility of the Social Expert who is the custodian of the procedure.



If material changes to operating procedures are required, the procedure may be updated on an “as required” basis. In case of any revision, the Director of Social Expert will coordinate with the Social Expert, OHS Expert, and Environmental Expert to ensure that all relevant operational updates are accurately reflected. Contractor/Subcontractor representatives will also be consulted if the changes directly affect site-level operations.

Once updated, the latest version of this procedure will be uploaded to the Project's Document Control System or shared communication platform to ensure that all staff, including subcontractors, have access to the most current version.

4.2 External Grievance Management Process

EGESA currently provides an active communication platform accessible via its website homepage (<https://egesa.com.tr/iletisim>), which includes the physical addresses and telephone numbers of relevant facilities, a general contact phone number, an email address, a contact form, and links to corporate social media accounts (see Figure 4-2 and Figure 4-3).

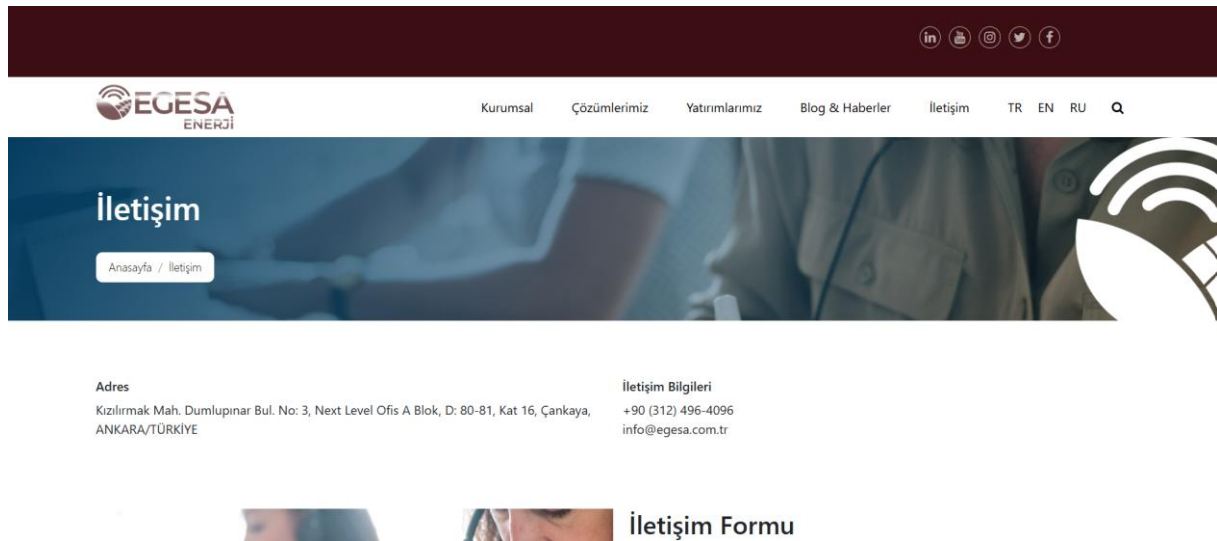


Figure 4-2 Contact Page- I



Kurumsal

Çözümlerimiz

Yatırımlarımız

Blog & Haberler

İletişim

TR | EN | RU



İletişim Formu

Adı: Soyadı:

Telefon: E-Posta:

Mesaj:

☐ Kişisel verilerimin işlenmesine ilişkin metni kabul ediyorum

☐ Ben robot değilim

Figure 4-3 Contact Page - II

4.2.1 Receiving Grievances

Grievances can be submitted through various channels, including phone, e-mail, contact forms, the project website (see Section 4.2), or through the contractor or subcontractor. Stakeholders may continue to use these existing channels to raise concerns. Additionally, project stakeholders will have access to a Project-Specific Grievance Register Form (see Annex A: Grievance Register Form), which may be submitted online or in hard copy during community meetings or site visits.

Once a grievance is received, the Social Expert will register it in the Grievance Database and initiate the process in accordance with this procedure. The Social Expert will monitor proper registration and timely follow-up.

The contact person to be assigned for grievance-related communication are provided in Table 4-1.

Table 4-1 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.



The Grievance Register Form (see Annex A: Grievance Register Form) will be used to collect the information about grievances, concerns, and the complainant. All grievances will be recorded and collected in the Grievance Database and Consultation Log (see Annex C: Grievance Database and Annex E: Consultation Log). “Open door policy” will not be encouraged as the one and only way of communication, therefore, written grievances anonymously (or not) should be encouraged.

4.2.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into Grievance Database and Consultation Log (see Annex C: Grievance Database and Annex E: Consultation Log). The Social Expert will carry out the initial assessment and coordinate with the OHS Expert, Environmental Expert, or Contractor/Subcontractor as needed depending on the nature of the grievance.

The Social Expert will supervise the investigation process and ensure proper coordination among all relevant parties.

The complainant may be contacted (if not anonymous) to gather more information, using the Consultation Form (see Annex B: Consultation Form) which is also used for regular meetings minutes. Any correspondence with the complainant will be recorded in the Grievance Database (see Annex C: Grievance Database) When the final decision is made on grievance, feedback will be given to stakeholder.

4.2.3 Feedback to Stakeholder

Complainants will receive a formal response acknowledging that the Project has received the grievance, within 5 days of submitting the grievance. Grievances received anonymously will be investigated in the same manner as non-anonymous grievances, but no formal response will be issued.

4.2.4 Propose Resolution/Corrective Action

Within 30 days of receipt of the grievance, the Social Expert will propose a resolution or corrective action and discuss it with the complainant (if not anonymous), in coordination with the relevant technical team (e.g., OHS, Environmental). The complainant will be informed about the methodology followed. All communication will be recorded in the Grievance Database (see Annex C: Grievance Database)



4.2.5 Close-Out of Grievances

The grievance procedure of the Project aims to formally close out every grievance within 30 working days, unless an alternative agreement is reached with the complainant. The complainant's signature (if not anonymous) will be obtained on the Grievance Closure Form (see Annex D: Grievance Closure Form, which summarizes the agreed-upon resolution. The signed Grievance Closure Form will be recorded in the Grievance Database (see Annex C: Grievance Database).

4.2.6 Non-Resolution Case

If a grievance cannot be resolved despite efforts within the defined timeframe, the Social Expert may consult with neutral third-party experts or relevant public institutions to facilitate a fair and effective solution.

4.3 Other Grievance Mechanisms

In addition to EGESA's 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.

5 MONITORING

5.1 Overview of Monitoring Requirements

In compliance with the Project Standards of this procedure, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring activities detects non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

5.2 Key Monitoring Activities

The key monitoring activities are used to assess grievance management. The Project will also monitor the efficiency and application of the third-party grievance mechanism. The procedures and the grievance management tool will be adjusted as required. Key monitoring measures are set out in Table 5-1 below.



Table 5-1. Key Monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	The Social Expert will review Grievance Log/Database, including grievances closed and unresolved per period at a minimum monthly to include: - number of outstanding complaints and grievances opened in a month, - number of grievances and grievances opened in the month and evolution since Project start (graphic presentation), - number of complaints and grievances closed in the month; and - type of grievance.	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors related to the project will be recorded by the Contractor/Subcontractor, including name, affiliation, and reason for visit.	Visitor Records	Monthly	Site office
Community Engagement Activities	The Social Expert will document both formal and informal engagement activities with local stakeholders.	Community Engagement Records	Monthly	Site office
Disclosure Materials and Feedback to Communities	The Environmental and Social Experts will ensure that materials disclosed (leaflets, info boards, digital postings) are archived and feedback from stakeholders is recorded.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	The Social Expert will track and document social responsibility efforts and integrate this information into the stakeholder engagement annual reports.	Annual reports	Annually	Site office

5.3 Key Performance Indicators (KPIs)

Table 5-2 below summarizes the key performance indicators and related key monitoring actions. These can be used to assess the progress and effectiveness of the proposed mitigation strategies.



Table 5-2. Key Performance Indicators (KPIs)

KPIs	Target	Monitoring Method
Total number of external 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 internal grievances that are closed within 30 days.	Target of 100%	Grievance database
% of customer complaints that are resolved within 30 days.	Target of 100%	Grievance database
% of external grievances that are resolved within 30 days.	Target of 100%	Grievance database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Annual 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

6 TRAINING

All necessary training regarding the grievance mechanism will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training for responsible personnel will be also provided as necessary. The implementation of this grievance mechanism will be followed by the Project Implementation Unit.

6.1 Induction Training

The induction training will provide information about the internal (worker) grievance mechanism to all direct and indirect workers, including contractors' employees. The trainings will be given in the first "Induction Training" session. All employees of the Project and subcontractors are required to participate in social training. This training will provide the information on how to understand and respect different opinions and to be an effective team member by behaving appropriately with locals and colleagues; how to raise a grievance/ suggestion or comments.

6.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the implementation of the grievance mechanism is also provided to the



Project Implementation Unit, personnel defined in the Section 2 and supervisors of the contractors.

7 AUDIT AND REPORTING

In this section, internal and external auditing is involved. For the Project activities, record keeping, and reporting basics are explained.

7.1 Internal and External Auditing

Internal and External Audits will be carried out in order to ensure the assessment of the grievance mechanism efficiency by Project Implementation Unit. Conformance and aspects of this procedure, which are subject to regulatory audits, will be monitored in accordance with the existing management systems and separately by Project Lenders. Monthly conformance will be monitored. Contractors will be subject to inspection and audit by the Project prior to a contractor's initial appointment.

7.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings and community engagement activities,
- Grievances actions and closeout of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- News on press and interviews,
- Audits, investigations, and incidents which will be managed according to the Project procedures.

On a monthly basis, an overview of the grievances recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out will be developed periodically. Project Implementation Unit will evaluate and conclude this overview with project management in the monthly progress meetings.

ANNEXES

Annex A – Grievance Register Form

Annex B – Consultation Form

Annex C – Grievance Database

Annex D – Grievance Closure Form

Annex E – Consultation Log



Annex A: Grievance 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
☐ Yüklenici/Alt Yüklenici Contractor/Subcontractor	☐ İşçi Sendikası Labour Union
☐ STK Association/NGO	☐ Medya Media
☐ İlgili Grup Related Group	☐ Üniversite University
☐ Oda/Meslek Birlikleri Chamber/Professional Body	☐ Diğer Other
2- İstişare Detayları Details of the Consultation	
Konu Subject	
Geri Bildirim Feedback	
Not Note	



Grievance Database									
Reporting Period									
Name/Contact Details of Grievance	Internal/ External	Grievance Received by	Date Received	Details of Grievance/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**

* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 10 days that the grievance solution process has started.

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



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



POSEIDON

Çevre Sosyal Danışmanlık Mühendislik
Ticaret Ltd. Şti

TEPE PRIME İş ve Yaşam Merkezi

Mustafa Kemal Mahallesi Dumlupınar Bulvarı
C Blok No: 123

Çankaya / ANKARA

Tel: + 90 532.347 71 85

+90 312 486 0106

E-posta:poseidon@poseidondanismanlik.com.tr