



**DRAFT REPORT**

**Project ANKA - G4-Viranşehir-5,7,8 Solar Power Plant,  
Şanlıurfa**  
*Stakeholder Engagement Plan*

Submitted to:

**KALYON YEKA GES 3 ve 4 GÜNEŞ ENERJİSİ YATIRIMLARI A.Ş.**  
Mimar Sinan Mah. Çavuşdere Cad. No: 41/A - 30 Nevofis Üsküdar / İstanbul

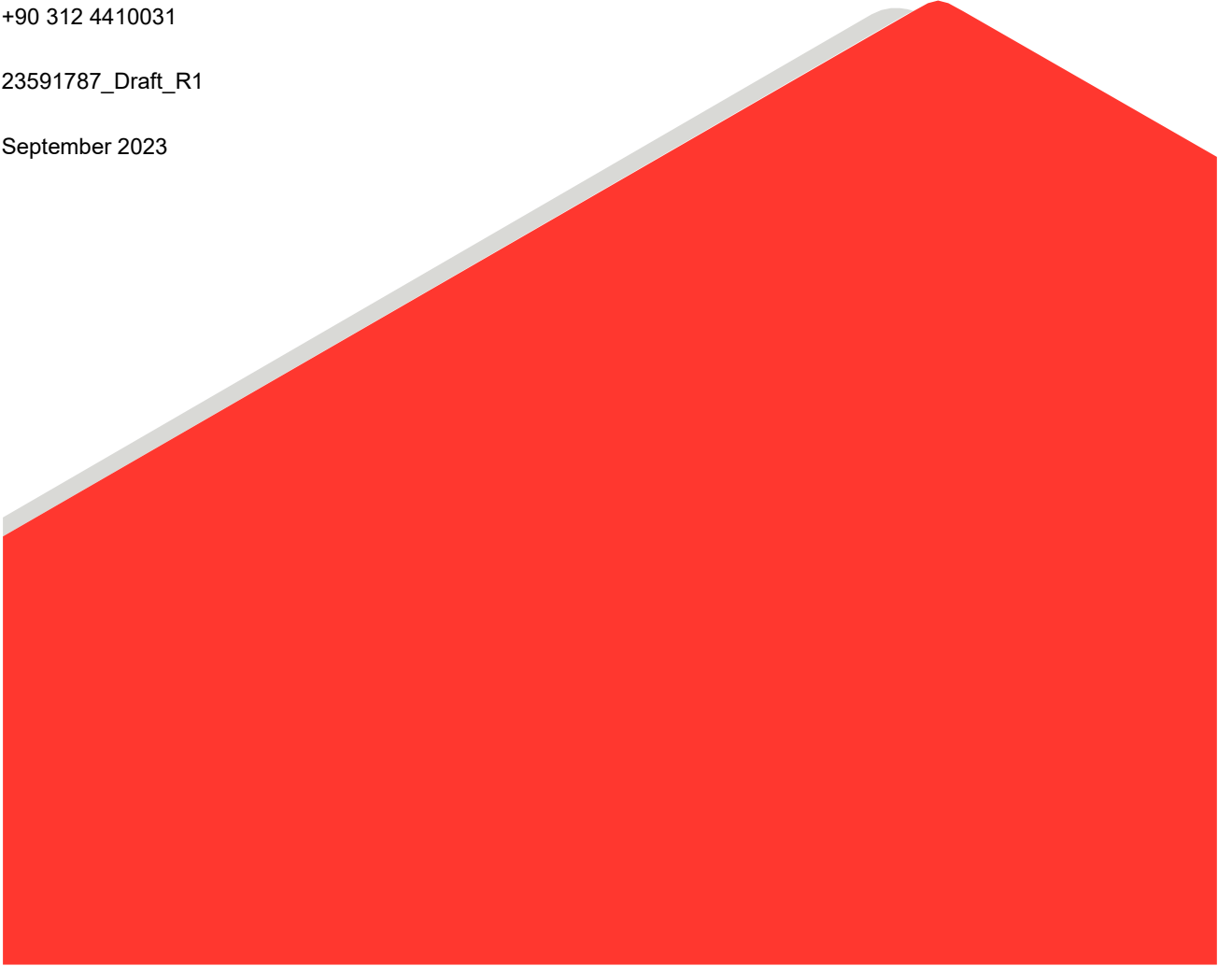
Submitted by:

**WSP Danışmanlık ve Mühendislik Ltd. Şti.**  
Hollanda Cad. 691. Sok. Vadi Sitesi No:4, Yıldız 06550 Ankara, Türkiye

+90 312 4410031

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## DEFINITIONS<sup>1</sup>

**Environmental and Social Impact Assessment:** The Environmental and Social Impact Assessment (ESIA) process is a way to identify, predict and assess the type and scale of potential E&S impacts, and opportunities to benefit conservation associated with any business activities or projects.

**Grievance Mechanism:** The IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009) defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

**Project Affected People:** Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

**Stakeholder:** Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

**Public consultation:** As referred in the IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009), public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups and organisations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

**Stakeholder Engagement Plan:** Stakeholder Engagement Plan (SEP) is a guidance for stakeholder consultations and communications during the period of the main ESIA studies and other aspects of the project analysis and design. SEP is a living document should be updated toward the end of the ESIA studies to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

**Vulnerable People:** Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

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<sup>1 1</sup> The definitions presented in here are directly quoted from the Performance Standards and the Guidance Notes of IFC.

## ABBREVIATIONS

<b>The Project</b>	G4-Viranşehir-5,7,8 Solar Power Plant Project
<b>‘Kalyon Enerji’ or ‘Project Owner’</b>	Kalyon Enerji Yatırımları A.Ş.
<b>Client</b>	Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş.
<b>EPC</b>	Engineering, Procurement and Construction, UKKA Group Limited
<b>WSP Türkiye</b>	WSP Danışmanlık ve Mühendislik Ltd. Şti.
<b>AESMR</b>	Annual Environmental and Social Monitoring Report
<b>AoI</b>	Area of Influence
<b>CLO</b>	Community Liaison Officer
<b>CLS</b>	Community Level Surveys
<b>CIMER</b>	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
<b>EIA</b>	Environmental Impact Assessment
<b>EPFI</b>	Equator Principles Financial Institutions
<b>EPs</b>	Equator Principles
<b>EPC-F</b>	Engineering, Procurement, Construction and Financing
<b>E&amp;S</b>	Environmental and Social
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMS</b>	Environmental and Social Management System
<b>HHS</b>	Household Surveys
<b>IFC</b>	International Finance Corporation
<b>KPIs</b>	Key Performance Indicators
<b>LRP</b>	Livelihood Restoration Plan
<b>MENR</b>	Ministry of Energy and Natural Resources
<b>MoTI</b>	Ministry of Transport and Infrastructure
<b>MoEUCC</b>	Ministry of Environment, Urbanization and Climate Change
<b>NGOs</b>	Non-governmental Organisations
<b>PAP</b>	Project Affected People



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<b>PIU</b>	Project Implementation Unit
<b>PSs</b>	Performance Standards
<b>SEP</b>	Stakeholder Engagement Plan
<b>SPSS</b>	Statistical Package for the Social Science
<b>TMMOB</b>	Union Chambers of Turkish Engineers and Architects
<b>TOBB</b>	Union of Chambers and Commodity Exchanges of Türkiye

## 1.0 INTRODUCTION

G4-Viranşehir-5,7,8 Solar Power Plant Project (“the Project”) having a capacity of 195 MWp/150MWe, is planned by Kalyon Enerji Yatırımları A.Ş. (“Kalyon Enerji”) and Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. (“Client”), a subsidiary of Kalyon Enerji. The Project will be located in Şanlıurfa Province, in the Viranşehir District, Kadıköy Neighbourhood in Türkiye.

The Project area was declared an area suitable for the development of a solar project: a Renewable Energy Resource Area. Consequently, it was launched the "Competition Announcement on the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy"; YEKA SPP-4 Erzin-Viranşehir (including G-4-Viranşehir-5,7,8) competitions were held on 28.06.2022. YEKA Right of Use Agreements were signed on 08.08.2022 with Kalyon Enerji Yatırımları A.Ş., which won the competition held by the Ministry of Energy and Natural Resources.

The Project consists of three sub-projects namely, G4-Viranşehir 5 Solar Power Plant Project, G4-Viranşehir 7 Solar Power Plant Project, and G4-Viranşehir 8 Solar Power Plant Project. Individual Environmental Impact Assessment (EIA) reports have been prepared for the sub-projects as per the requirements of national EIA Regulation and the “EIA Positive” decisions for each Project have been acquired as shown in Table 1.

**Table 1: EIA Decisions of Sub-Projects**

Name of Sub Project	Allocated area (ha)	Capacity	National Status	EIA	Type of the Land
G4-Viranşehir 5 Solar Power Plant Project	90	65 MWp/65 MWm/50 MWe	EIA Decision (Decision No: 6998)	Positive Acquired	Pastureland and Grassland
G4-Viranşehir 7 Solar Power Plant Project	90	65 MWp/65MWm/50MWe	EIA Decision (Decision No: 6996)	Positive Acquired	Pastureland and Grassland
G4-Viranşehir 8 Solar Power Plant Project	90	65 MWp/65MWm/50MWe	EIA Decision (Decision No: 6997)	Positive Acquired	Pastureland and Grassland
<b>TOTAL</b>	<b>270</b>	<b>195 MWp/65MWm/150MWe</b>		-	-

A Gap Analysis Study, previously prepared by WSP Danışmanlık ve Mühendislik Ltd. Şti. (“WSP Türkiye”) in May 2023, has identified gaps of the existing national EIA Report and available documentation obtained from Kalyon Enerji and suggest actions to close these gaps to reach a full bankable ESIA in line with the International Conventions, IFIs Performance Standards (Equator Principles IV (EP), International Finance Corporation (IFC) Performance Standards (PS), Organisation for Economic Co-operation and Development (OECD)’s Common Approaches and Guidelines, and the best practices in the industry along with the national legislation).

Kalyon Enerji retained WSP Türkiye to prepare the Environmental and Social Impact Assessment (“ESIA”) for the Project in compliance with the national and international requirements detailed above.

The main components of the plant consist of solar panels, a panel carrier system, an inverter station (inverter, transformer, ring main unit and the substation). Associated infrastructure and utilities can be listed as the administrative building, Supervisory Control and Data Acquisition (SCADA) System and the overhead transmission line (OHTL). Once the Solar Power Plant is put into operation, it is planned to produce 150 MWe of electricity annually, and the electricity produced will be connected to the Viranşehir Substation via new ~26.7 km 154 kV OHTL. Details of the Project components are provided in Chapter 3 of this report.

The Project pre-construction activities, namely, mobilization of temporary site facilities, site preparation, grading and levelling, material delivery and storage and certain early trenching activities for cable laying has started in August 2023. The construction period of the Project is estimated to be 10 months, test and commissioning period will be 7 months and the total operation period will be 30 years.

The Project will be established on a pastureland of 270 hectares. Adıyaman-Şanlıurfa-Diyarbakır Planning Region 1/100.000 Scale Environmental Plan Amendment (M44, N42 and N43 Plan Plots, Plan Amendment Explanation Report) was approved on 07.07.2020 in accordance with Article 102 of the Presidential Decree No. 1. This Environmental Layout Plan is located within the borders of "Grassland-Pastureland" as land uses in the 1/100.000 scale N43 Plan. The Project areas are also classified as "Pastureland" in terms of title deed.

## 1.1 Project Background

It is of great importance to create a balanced portfolio in electricity generation by increasing the share of renewable energy resources and resource diversity in total electricity generation. With the Renewable Energy Resource Area (YEKA) model realized in this context, the cost of electricity purchased from renewable energy generation facilities will be reduced while developing domestic production in renewable energy technologies and increasing the capacity of qualified human resources.

The Regulation on Renewable Energy Resource Areas was published in the Official Gazette dated 09/10/2016 and numbered 29852. With this Regulation, a new investment model for the utilization of renewable energy resources was introduced.

YEKAs are determined within the scope of administrative and technical studies conducted by the Ministry of Energy and Resources and announced in the Official Gazette. In this case, those who will participate in YEKA competitions know for which area they will apply.

In addition to this method, after the contract is signed by the winner of the "Competition for Connection Capacity Allocation for YEKA Purposes", candidate YEKAs (project sites) are proposed to be located in the connection region where the connection right is acquired, and these areas can be announced as YEKA and allocated to the investor if deemed appropriate by the Ministry.<sup>2</sup>

The legal status of the plot of the Project area was formerly pastureland, and it was declared an area suitable for the development of a solar project: a Renewable Energy Resource Area. Consequently, it was launched the "Competition Announcement on the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy"; YEKA SPP-4 Erzin-Viranşehir (including G-4-Viranşehir-5,7,8) competitions were held on 28.06.2022. YEKA Right of Use Agreements were signed on 08.08.2022 with Kalyon Enerji Yatırımları A.Ş., which won the competition held by the Ministry of Energy and Natural Resources.

Construction activities are planned to be started between August and September 2023.

## 1.2 Project Description

G4-Viranşehir-5,7,8 Solar Power Plant Project having a capacity of 195 MWp/150MWe, is planned by Kalyon Enerji Yatırımları A.Ş. ("Kalyon Enerji") and this Project will be developed and constructed by Kalyon YEKA GES 3 ve 4 Güneş Enerjisi Yatırımları A.Ş. ("Client"), a subsidiary of Kalyon Enerji. The Project will be located in Ni Şanlıurfa Province, in the Viranşehir District, Kadıköy Neighbourhoods in Türkiye. Once the Solar Power Plant is put into operation, it is planned to produce 150 MWe of electricity annually, and the electricity produced will be connected to the Viranşehir Substation via new ~26.7 km 154 kV OHTL.

<sup>2</sup> <https://enerji.gov.tr/eigm-yenilenebilir-enerji-uretim-faaliyetleri-yeka-modeli>

The Project pre-construction activities, namely, mobilization of temporary site facilities, site preparation, grading and levelling, material delivery and storage and certain early trenching activities for cable laying is planned to be started in August 2023.

Project layout is presented in Figure 1.



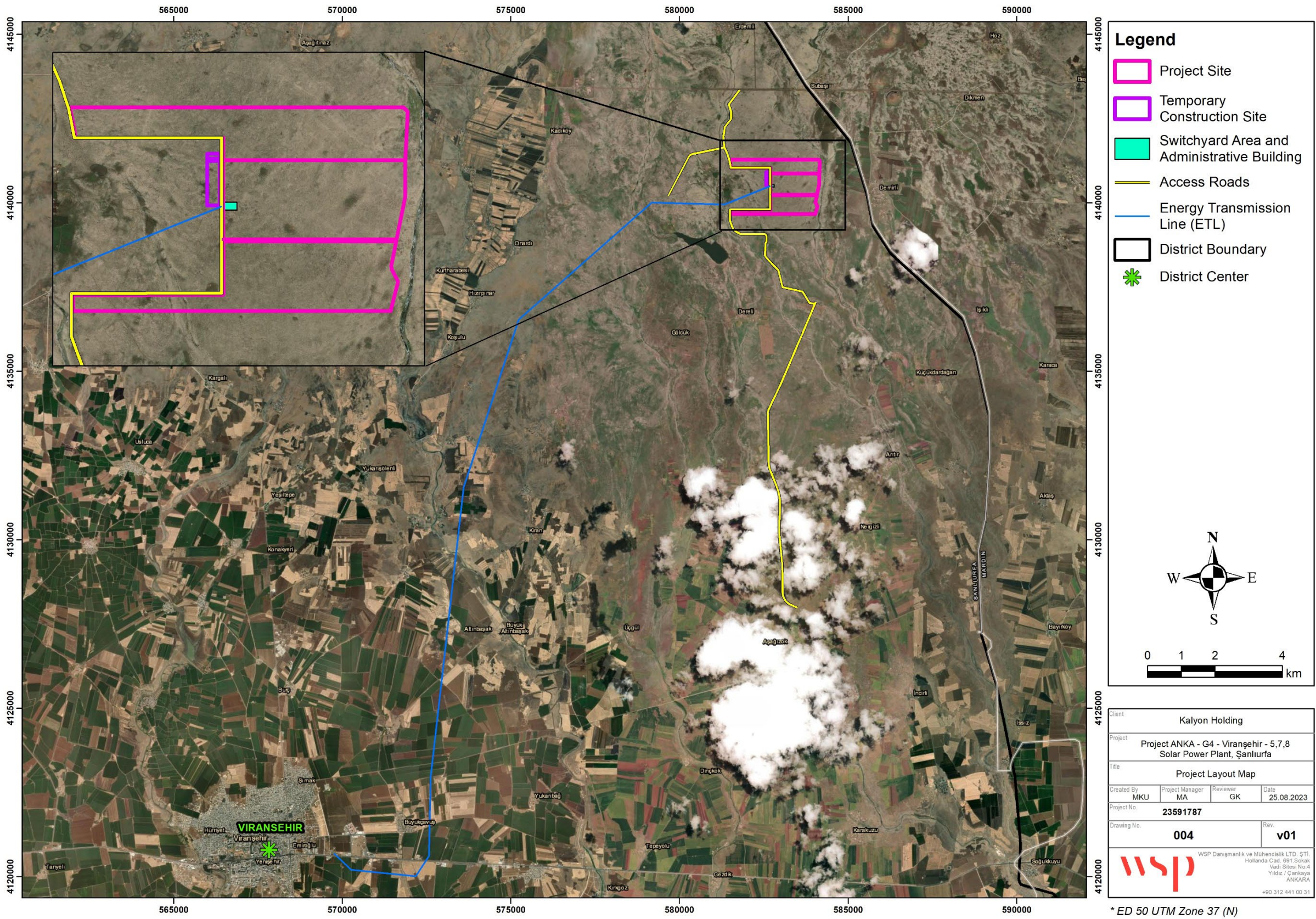
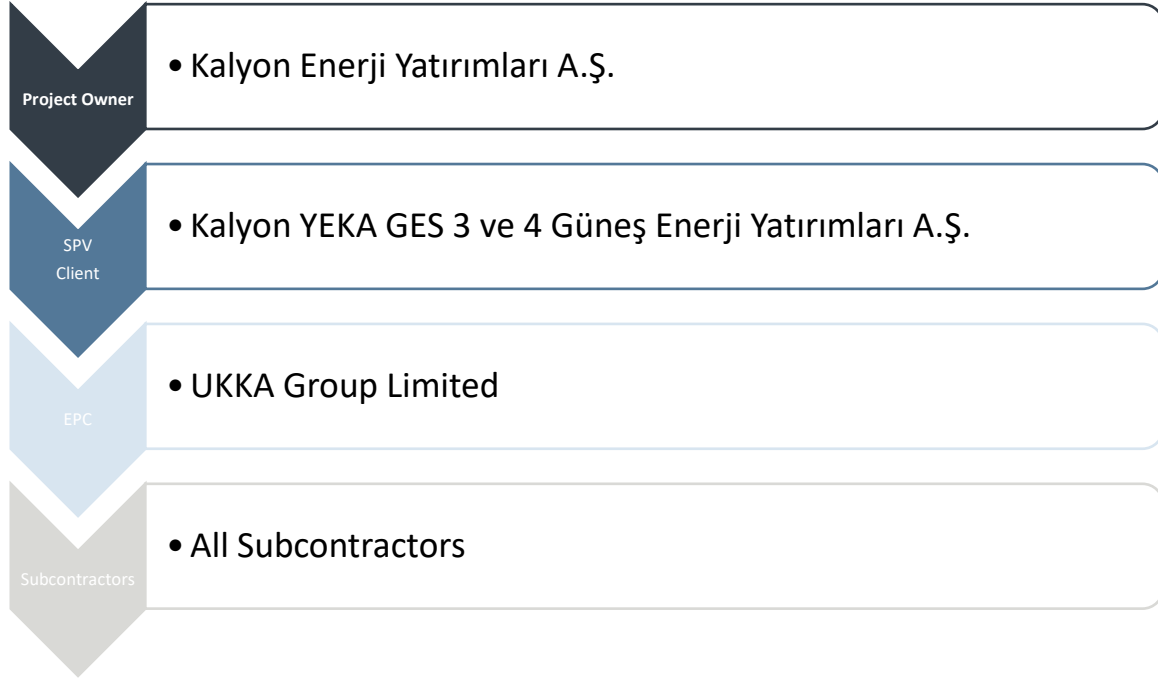


Figure 1: Project Layout



### 1.3 Project Parties

Project parties that will be involved in the SPP investment are illustrated below.



**Figure 2: Illustration of Project Parties**

Project Owner: Kalyon Enerji Yatırımları A.Ş.

SPV and the Client: Kalyon YEKA GES 3 ve 4 Güneş Enerji Yatırımları A.Ş., special purpose vehicle established for construction and operation of the facility, subsidiary of Kalyon Enerji Yatırımları A.Ş.

EPC: UKKA Group Limited, responsible for engineering, procurement, and construction during the construction phase of the facility.

TEİAŞ: Turkish Electricity Transmission Corporation, a public government company, that operates and owns the transmission of electricity, is responsible for the planning of a transmission investment for the new transmission facilities to be established, to establish new transmission facilities. The right of ownership and operation boundary of TEİAŞ starts at the connection point to the transmission system. In case the connection of the generation or consumption facility to the transmission system is carried out through the switchyard of another generation or consumption facility, the right of use, operation, and maintenance of the connected feeder belongs to TEİAŞ. However, TEİAŞ may request the operation and maintenance of such equipment to be performed by the relevant generation or consumption facility at a specified cost.

Global Enco Energy: contractor responsible for the construction of energy transmission lines for all YEKA Projects under an ordinary partnership that will be established with the participation of YEKA Project Owners including Kalyon Enerji.

Based on the information provided by the Client, the roles and the main responsibilities of the Project parties are summarized in Figure 2 above.

## 1.4 Project Timeline

A summary of the Project schedule is presented in Table 2. According to the schedule, the construction period of the Project is estimated to be 8 months and the overall operational period is estimated as 30 years.

**Table 2: Project Schedule Summary**

Activity	Start Date	Finish Date
<b>Permitting</b>		
Ministry Approval of Design	15-Mar-23	10-Aug-23
Construction Permit	15-Sep-22	10-Aug-23
Final Delivery Acceptance Certificate Application & Issuance	01-Mar-24	05-Mar-24
The signing of the YEKA Contract	08-Aug-22	
Master Plan Approval	20-Nov-22	14-Sep-23
EMRA (EPDK) Pre-License Approval	09-Nov-22	09-Mar-23
Base Plan Approval of the Site	04-Oct-22	30-Oct-22
Environmental Impact Assessment Approval	15-Sep-22	25-Jan-23
Signing TEİAŞ Connection Agreement	05-Oct-22	22-Jun-23
Transfer of Land Ownership	18-Nov-22	18-Aug-23
Land Allocation Approval	25-Nov-23	29-Nov-23
Electricity Generation License Approval	19-Oct-23	13-Nov-23
Baseline Studies (Physical Measurements & Biodiversity Monitoring)	04-Apr-23	05-Jun-23
<b>Engineering</b>	<b>06-Sep-22</b>	<b>30-Aug-23</b>
SPP Engineering	28-Sep-22	24-Jun-23
Substation Contracting & Engineering	06-Sep-22	01-Jul-23
OHTL Contracting, Engineering	04-Oct-22	15-Jun-23
CCTV & Lighting Engineering	01-Aug-23	30-Aug-23
<b>Procurement</b>	<b>11-Apr-23</b>	<b>07-Sep-23</b>
<b>Early Works</b>	<b>01-Jun-23</b>	<b>29-Feb-24</b>
Rock Removal from Site Surface (Under Responsibility of Municipality)	15-Aug-23	29-Aug-23
Mobilization Works	15-Aug-23	13-Sep-23
Reptile & Mammal Nest Monitoring Prior to Earthworks	15-Aug-23	13-Sep-23
<b>Construction</b>	<b>15-Aug-23</b>	<b>21-Jun-24</b>
Solar System	15-Aug-23	21-Jun-24
Substation	15-Aug-23	11-Mar-24
OHTL	15-Aug-23	11-Mar-24
<b>Test &amp; Commissioning &amp; Provisional Acceptance</b>	<b>18-Dec-23</b>	<b>03-Jul-24</b>
Solar System	18-Dec-23	03-Jul-24

Activity	Start Date	Finish Date
Substation	17-Mar-24	31-Mar-24
154 kV OHTL	12-Mar-24	16-Mar-24

## 2.0 REGULATORY REQUIREMENTS

### 2.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

#### 2.1.1 The Constitution of the Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

#### **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion**

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

#### **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - 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 impart information and ideas without interference from official authorities.

#### **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing**

##### A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

#### **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth**

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

#### **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition**

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

#### 2.1.2 Other main national laws/regulations

##### I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

##### II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to



information on the activities of public institutions and professional organisations, which qualify as public institutions.

### **III. Law on the Use of Right to Petition**

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

### **IV. Expropriation Law**

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

### **VI. Environmental Law**

The Turkish legal framework for environmental protection was developed in line with national and international initiatives and standards, and some of them have been revised recently to be harmonized with the EU Directives in the scope of pre-accession efforts of Türkiye to the EU. In the following sections, related institutions, legislation, processes, and procedures that are related to the environmental and social aspects of the proposed Project are described.

The Ministry of Agriculture and Forestry ("MoAF") is the responsible organization for the issuing and implementation of policies and legislation adopted for the agricultural areas, forestry areas and protected areas.

The Turkish Environment Law No. 2872, which came into force in 1983, deals with environmental issues on a very broad scope. According to the basic principles that govern the application of the Environment Law, and as stated in the Constitution, citizens as well as the state bear responsibility for the protection of environment. Complementary to the Environment Law and its regulations, other laws also govern the protection and conservation of the environment, the prevention and control of pollution, and the implementation of measures for the prevention of pollution.

The Environment Law of 1983 has a comprehensive structure that has a holistic and integrated vision for the environment. "Polluter pays" and "user pays" principles and carrying capacity concepts form the basis of regulatory tools in the Environmental Law. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with EU legislation, thus contributing significantly to compensating the gaps within the former legislative system of Türkiye.

The EIA Regulation, which dates originally from 1998, has had several revisions and was most recently amended on July 29<sup>th</sup>, 2022. Although the EIA Regulation has been derived from the European Union EIA Directive, the integration of various Turkish conventions, sub-laws and governmental decrees makes the EIA Regulation distinctive in certain respects.

The lead government agency, responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for protection and conservation of the environment and for sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,

- Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
- Defining and applying environmental quality standards,
- Supervision of the network of environmental laboratories in Türkiye,
- Pollution control and inspection activities,
- Agroforestry support, soil management and erosion control, and
- Protection of Türkiye's natural heritage including national parks, areas of conservation interest, biodiversity and wildlife.

## EIA Regulation Stakeholder Engagement Plan

Information sharing and stakeholder engagement are done within the scope of the provision published in the Official Gazette dated July 29, 2022, and numbered 31907 of ARTICLE 9-(5), "Informing the Public and Participating in the Process Meeting" of The Regulation of the EIA: *"To inform the public about the project and its effects, SEP is prepared by the institutions/organizations authorized by the Ministry to receive their opinions and suggestions. The prepared stakeholder engagement plan is presented in the EIA application file. When the Ministry deems it necessary, distribution of informative brochures, and questionnaires, conducting studies such as seminars or sharing information by preparing a website related to the project can be asked to inform the public throughout the EIA process by authorized institutions/organizations. In addition, if requested by the Ministry, this plan is updated during the EIA process."*

For the projects included in the Annex-1 list of the EIA Regulation, it is a legal obligation to organize the "Public Informing and Process Participation Meeting" to inform the local people who will be affected by the project.

This plan includes the stakeholders directly or indirectly affected by the Project, a public document presenting plans for engagement, and sharing communication information with the stakeholders. The project owner should ensure that environmental and social policies, national and international standards are met and in line with the requirements of credit institutions. The plan should be updated for each stage according to changing needs and conditions.

SEP must include a Project Overview, a Summary of Possible Social Impacts of the Project, National and International Stakeholder Engagement Plan Requirements, Stakeholder Identification (Local People, Local Administrations, National Administrations, Non-Governmental Organizations), Information sharing, Participation Activities, Public Informing and Participation in the Process Meeting, Complaint Mechanism, Monitoring and Reporting and Resources and Responsibilities.

## 2.2 International Standards

### 2.2.1 IFC Performance Standards

IFC's Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. PSs establish standards that the client is to meet throughout the life of an investment by IFC. Applicable standards guiding social studies are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement

#### ■ Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires the client to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP to be include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

### **2.2.2 Equator Principles**

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs.

The Client is committed to complying with the following EPs:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.
- Principle 4: Environmental and Social Management System and EPs Action Plan.
- Principle 5: Stakeholder Engagement.
- Principle 6: Grievance Mechanism.
- Principle 7: Independent Review.

- Principle 8: Covenants.
- Principle 9: Independent Monitoring and Reporting.
- Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, “For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. The client will tailor its consultation process to the risks and impacts of the Project, the Project’s phase of development, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.”

“To facilitate stakeholder engagement, the Kalyon Enerji will be commensurate to the Project’s risks and impacts, make the appropriate assessment documentation readily available to the affected communities, and where relevant other stakeholders, in the local language and a culturally appropriate manner.”

“The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis.”<sup>3</sup>

Principle 6 in specific sets out that “For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project’s environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process.”

### 2.2.3 World Bank

The World Bank ESS 10, “Stakeholder Engagement and Information Disclosure”, recognizes the importance of open and transparent engagement between the Borrower and Project stakeholders as an essential element of good international practice. Specifically, the requirements of ESS10 are as follows:

- Borrowers will engage with stakeholders throughout the Project life cycle, commencing such engagement as early as possible in the project development process and in a time frame that enables meaningful consultations with stakeholders on Project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential risks and impacts,
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation,
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place;

<sup>3</sup> <https://equator-principles.com/>

(iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

- The Borrower will maintain and disclose, as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

This standard requires the Borrower to develop a SEP proportionate to the nature and scale of the Project and its potential risks and impacts, disclose it as early as possible prior to Project appraisal, and seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP. In addition, the Borrower will also develop and implement a grievance mechanism to receive and facilitate resolutions of Project-affected parties' concerns and grievances related to the environmental and social performance of the Project in a timely manner.

## 2.3 Project Standards

The below listed policies were developed specifically for Project ANKA by Kalyon Enerji during ESIA process. The requirements included in these policies will also be applied for the Project. These policies will be adapted, revised if needed, and implemented for the Project.

- Integrated Management System Policy
- Health and Safety Policy
- Environment and Climate Change Policy
- Social Impact and Human Right Policy
- Human Resources Policy

## 3.0 STAKEHOLDER IDENTIFICATION

According to the IFC definition, the Stakeholders are persons or groups who are directly or indirectly affected by a project and those who are not directly affected by the project but that have an interest in a project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses and direct and third-party employees.

The overall aim of stakeholder identification is to identify and prioritise Project's stakeholders for the informed consultation and participation. Stakeholder identification is an ongoing process. The list of the identified stakeholders should be assessed and updated according to the outputs of the grievance mechanism and for the different phases of the Project, and the Project updates.

Potential stakeholders are categorised and prioritised according to affection status, interest level or ability of influence.

### 3.1 Project's Stakeholders

In general, stakeholders can be categorised into two groups:

- Primary stakeholders are the individuals and the communities who are affected by the Project impacts directly; and

- Secondary stakeholders are those who have an interest or influence on the Project (negative or positive).

The key stakeholders include:

- International bodies and organizations (e.g., international investors, international finance institutions, international non-governmental organisations (NGOs)),
- National Governmental Authorities,
- Regional Government Agencies/Authorities,
- Local Authorities,
- National and local NGOs and organizations,
- Trade unions and associations,
- Education and training institutions (e.g., Universities, colleges, think tanks),
- Industrial sector (e.g., construction and infrastructure trade bodies),
- Project Affected People (PAPs):
  - Mukhtars/local authorities of Project affected settlements,
  - Local community members,
  - Landowners and Land users (formal and informal land users), and
  - Vulnerable groups: the elderly, the disabled, female-headed households, landless-poor households and/or persons, ethnic minorities, immigrants, refugees, etc.
- Project employees, employee representatives,
- Third party goods and service suppliers, contractors, and its sub-contractors,
- Social services (e.g., hospitals, local schools, and other local community services), and
- Media.

Table 3 below represents the identified stakeholders in accordance with the above classification.

**Table 3: Stakeholder Classification**

Type	Stakeholders	Affected		Interested/ influenced
		Direct	Indirect	
Internal Stakeholders				
Project Owner	Kalyon Enerji Yatırımları A.Ş.	X		
Client	Kalyon YEKA GES 3 ve 4 Güneş Enerji Yatırımları A.Ş.,	X		
EPC	UKKA Group Limited	X		
Sub-contractor	Sub-contractors- to be determined.	X		
Employees	Project employees	X		
Consultants	Project consultants -to be determined.	X		
External Stakeholders				
International bodies and organizations	Lenders, potential lenders			X
National Governmental Authorities	Ministry of Energy and Natural Resources			X
Regional/Local Authorities	Şanlıurfa Governorship Viranşehir District Governorates Şanlıurfa Provincial Directorates of Central Government Institutions Viranşehir District Directorates of Central Government Institutions Karacadağ Development Agency Şanlıurfa Municipality Viranşehir District Municipality Mukhtars of the Kadıköy, Subaşı, Gölcük, Demirli neighbourhoods	X		

Type		Stakeholders				Affected		Interested/ influenced
						Direct	Indirect	
National and Local organizations and NGOs and	Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) WWF Türkiye Women-specific associations İŞKUR							X
Education and training institutions		Harran University <b>Şahinbey District:</b> There are 16 public preschools, 1 special education preschools, 158 public primary schools, 88 public lower secondary schools, 20 high schools, and 1 public education centre.						X
Social services		Şanlıurfa has 13 State Hospitals, 5 Private Hospitals, 4 Oral and Dental Health Centres, 2 Dialysis Centres, 2 Medical Centres, 1 University Hospital and 1 Training and Research Hospital. The total number of beds in the province is 4216. A total of 11,241 health personnel work in Şanlıurfa and there are 1.2 doctors per thousand people.					X	
PAPs	Local Communities	Residents of Kadıköy, Subaşı, Demirli, Gölcük villages				X		
PAPs Affected by Land Allocation of Pastureland	People engaged with animal husbandry	Kadıköy Subaşı Demirli Gölcük						
Media								X
		Şanlıurfa News	Şanlıurfa News Websites		Şanlıurfa Radio			
		Ceylanpınar Newspaper	http://www.ceylanpinargazetesi.com/		Harran FM	Edessa TV		



Type	Stakeholders	Affected		Interested/ influenced
		Direct	Indirect	
	<div>Damga Newspaper</div> <a href="https://www.gazetedamga.com.tr/">https://www.gazetedamga.com.tr/</a> <div>Siverek FM</div> <div>Güneydoğu TV</div> <div>GAP Gündemi Newspaper</div> <a href="https://www.gapgundemi.com/">https://www.gapgundemi.com/</a> <div>Radyo Liva</div> <div>Kanal Urfa</div> <div>Gazete İpekyol Newspaper</div> <a href="https://www.gazeteipekyol.com/">https://www.gazeteipekyol.com/</a> <div>Ruha TV</div> <div>İrfan Newspaper</div> <a href="https://www.irfangazetesi.com/">https://www.irfangazetesi.com/</a> <div>Duru TV</div> <div>Siverek Hedef Newspaper</div> <a href="https://www.siverekgazeteleri.com/">https://www.siverekgazeteleri.com/</a> <div>Şanlıurfa Newspaper</div> <a href="https://www.sanliurfagazetesi.com/">https://www.sanliurfagazetesi.com/</a> <div>Şanlıurfa Olay Newspaper</div> <a href="https://www.sanliurfaolay.com/">https://www.sanliurfaolay.com/</a> <div>Şanlıurfa Viranşehir Bizim Newspaper</div> <a href="http://www.bizimgazete63.com/">http://www.bizimgazete63.com/</a> <div>Urfa Değişim Newspaper</div> <a href="https://www.urfadegisim.com/">https://www.urfadegisim.com/</a> <div>Urfanatik Newspaper</div> <a href="https://www.urfanatik.com/haberleri/hilvan">https://www.urfanatik.com/haberleri/hilvan</a> <div>Yeniurfa Newspaper</div> <a href="https://www.yeniurfagazetesi.com/">https://www.yeniurfagazetesi.com/</a>			
Third party good and services providers	To be identified			X

### 3.2 Identification of Vulnerable Groups

Vulnerable groups refer to the persons that have specific characteristics that make them more likely than others to require humanitarian assistance or being excluded from financial and social services. As also included in the IFC standards, the Client should take age, gender, ethnicity, mental and physical disability, poverty, socioeconomic status, educational levels, and dependence on unique natural resources of people into account.

According to the results of the surveys, vulnerable groups of the local communities were identified and presented in this SEP. The categories of vulnerable groups for this Project are defined as Illiterate, People who cannot speak Turkish, Seasonal workers, Nomads, Mobile beekeepers, Refugees, Women-headed households, People living with social assistance, Children of education age but not participating in education, Bedridden patients, People over 70 years old living alone, People with physical disabilities, People with mental disabilities, and earthquake victims.

Identification of vulnerable groups will be an ongoing process; therefore, the Project CLOs will be responsible to identify and continue to engage with vulnerable groups throughout the Project's lifespan.

From the early phases of the Project, special consideration and assistance will be provided to people identified as vulnerable to ensure inclusivity on decision making, grievance mechanism and information spread has been established to all targeted stakeholders. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner. Vulnerable groups of the local communities presented in Table 4.

Table 4: Vulnerable groups in the V/Ns

District	Settlement	Illiterate	Cannot speak Turkish	Seasonal worker	Mobile beekeeper	Refugee	Woman headed households	Persons living with social aid	At education age but not involved in education	Bedridden Patients	Persons living alone over 70 years old	People with physical disabilities	People with mental disabilities	Earthquake victims (number of household)	Persons engaged in unauthorized agricultural activities on public lands	Persons with unauthorized structures on public lands (house, workplace, barn, hut, etc.)
Viranşehir	Kadıköy	100	100	350 (household)	1 (household)	0	2	Unknown	0	5	0	1	6	0	0	0
	Gölcük	200	0	200	0	0	5	0	0	6	7	10	2	0	0	0
Derik	Demirli	10	0	350	0	0	0	0	0	0	0	5	0	0	There are farmers on public land, but the number is unknown	
	Subaşı	5	80	150	0	0	6	50	0	0	0	2	0	0	0	

## 4.0 STAKEHOLDER ENGAGEMENT TOOLS

The purpose of the identification of various tools and methods for the stakeholder engagement is to provide for all stakeholders to access the Project with the means of their choice to ensure meaningful stakeholder participation. The effectiveness of engagement tools will be monitored, and, if necessary, new engagement tools will be developed.

**Table 5: Stakeholder Engagement Tools**

Engagement Tools	Content of the Tools
<b>Community meetings</b>	The Client will conduct community meetings with the assistance of the Mukhtars in the affected settlements to inform the stakeholder on the environmental and the social impacts of the Project, introduce CLOs to the community members and inform them about the grievance mechanism.
<b>Project website</b>	<p>Project Owner has a website for its energy investments. A Project website will be established during the ESIA process. It is the most essential platform/tool for online engagement with stakeholders and it will be used to communicate up to date information related to the Project. The Project-related documentation, including NTS, SEP, Grievance Forms and other supporting management plans, will be disclosed through the Project's website. It will be ensured that the below listed documents, at minimum level, disclosed on the Project's website:</p> <ul style="list-style-type: none"> <li>▪ Project information including the purpose of the Project,</li> <li>▪ Project location and general Project layout,</li> <li>▪ Permissions/approved EIA reports,</li> <li>▪ Project progress and timeline,</li> <li>▪ Environmental and Social Policy of the Project,</li> <li>▪ Non-Technical Summary,</li> <li>▪ SEP,</li> <li>▪ ESAP,</li> <li>▪ The grievance mechanism and the grievance forms will be available on the project website,</li> <li>▪ Frequently Asked Questions,</li> <li>▪ Job Application Form</li> <li>▪ Contact details of the CLOs and other relevant key personnel.</li> </ul>
<b>Phone calls, e-mails text messaging</b>	<p>The phone number/e-mail address of the CLOs was distributed. CLO engages directly with stakeholders through phone calls or emails or text messaging on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested.</p> <p>Please See: myuksekyayla@kalyonholding.com</p>
<b>Project Hotline</b>	<p>A hotline will be established to allow the project stakeholders convey their grievances (complaints, opinions, and suggestions etc.) during the ESIA process of the Project. This phone number is especially planned to ensure more active participation of vulnerable groups and women who have problems in accessing the internet. The phone number will be posted on stakeholder institutions such as provincial directorates, municipalities, the mukhtars' offices of the affected surrounding settlements, and public spaces.</p> <p>Project contact: +905466171719</p>
<b>Project posters/ brochures / flyers / billboards</b>	<p>A brochure for the Project will be developed that includes information about the Project, ESIA process and provides contact information (e-mail, phone, postal address and fax) of the and CLOs of the Project Company for any grievances.</p> <p>Brochures/flyers/poster/billboards with communication channels, announcements and information about the Project will be available in common public areas in surrounding</p>

Engagement Tools	Content of the Tools
	settlements. Mukhtars' offices, municipalities, provincial directorates, stakeholder professional chambers etc.
<b>Grievance Mechanism - Grievance boxes (Wish and Complaint Boxes) for employees and for external stakeholders</b>	<p>A grievance mechanism (including both internal for workers and external for community) allowing stakeholders to raise concerns or complaints personally and via post, electronic mail etc. was developed for the Project and this mechanism was adopted to the Project.</p> <p>For the employees working at the Project will be provided grievance boxes to convey their complaints, concerns, and opinions through these boxes. It should be located in areas that can be easily reached by the employees, such as the cafeteria and resting area.</p> <p>Grievance boxes, including simple-to-use forms were placed at points where external stakeholders can easily access to share complaints, suggestions and opinions. Especially the disadvantaged stakeholder groups and vulnerable groups living in the affected settlements will be considered. Project grievance boxes for external stakeholders should be placed in mukhtars' offices, village cafes, and public spaces in the affected settlements</p>
<b>Newspaper</b>	As appropriate, relevant Project information will also be provided to public media. This activity will mainly be undertaken during ESIA disclosure and construction. It will also occur if any significant changes to the Project are envisaged, impacting local communities or land uses.
<b>Face to face meetings</b>	Open and targeted meetings will continue to be held to engage with stakeholders.

## 5.0 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES BY KALYON

### 5.1 Stakeholder Engagement Meetings under EIA Process

The purpose of the Public Informing and Participation in the Process meeting is to inform the local people living in nearby settlements that are likely to be affected by the Project activities and to listen and evaluate their opinions and thoughts on the subject. In line with the provisions of the EIA Regulation dated 29.07.2022 and numbered 31907, in order to inform the public and get their opinions and suggestions, a public participation meeting was held in a central settlement close to the Project area and suitable for population, deemed appropriate by the Provincial Directorate of Environment, Urbanization and Climate Change (On 9.09.2022 at 14:30, in Şanlıurfa province Viranşehir district, Kadıköy Neighborhood location, Düzlük Village, Düzlük condolence house), and the announcement stating the date, time, place and subject of the meeting was published in a national newspaper and a local newspaper published in that region at least ten days before the meeting date.

The attendants of the meeting are:

- Officials of the Ministry of Environment, Urbanization and Climate Change,
- Şanlıurfa Governorship Environment, Urban Planning and Climate Change Provincial Directorate Officials,
- Kalyon Enerji Yatırımları Anonim Şirketi (Investor Company),
- EN-ÇEV Enerji Çevre Yatırımları ve Danışmanlığı Haritacılık İmar İnş. A.Ş. (Consulting Firm),
- And local people.

In the Meeting of Public Informing and Participation in the Process, a presentation was made by the Consultant firm to the participants and detailed information about the planned activity was given. Regarding the project, questions were asked about the local people's dealing with animal husbandry and whether the Project would have negative effects, and the questions were answered by EN-ÇEV A.Ş.

KALYON ENERJİ YATIRIMLARI ANONİM ŞİRKETİ G4-VİRANŞEHİR-8-SPP (65 MWp/65 MWm/ 50 MWe-90 ha) PROJECT EIA REPORT 248 periodical published in the region where the Project will take place, in a newspaper defined as a common periodical.

In order to keep the public informed, brochures will be distributed, a complaint mechanism will be established, and if necessary, studies such as surveys and seminars will be carried out before the Public Informing and Participation in the Process Meeting or published on the website.

In addition to the EIA process described above, previous stakeholder engagement activities by the Client are presented in the table below.

Table Stakeholder Meetings (Until August 2023)Stakeholder Engagement Activity	Number
Community pre-construction meeting	1
Consultation meeting	2
Women focus group meeting	0
Community Health and Safety Awareness Meeting	0
Local Authorities Meeting	8
Mukhtar Meeting	10
Interviews on CDP	2
TOTAL	23

## 6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES

### 6.1 Stakeholder Engagement Activities for ESIA

#### 6.1.1 Area of Influence

The Area of Influence ("Aol") of the Project is the area in which a direct or indirect impact on the biological, physical, and social components might occur.

As defined by IFC PS1, the Area of Influence encompasses:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.
- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.

- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The baseline conditions represent the environmental (i.e., physical, and biological components) and social context prior the realization of the Project, thus, before any possible disturbance from Project activities may occur. The definition of the baseline conditions represents the starting point upon which the impact assessment is built. The goal is to assign a sensitivity value to each environmental and social component expected to be affected by the Project.

The social area of influence of the Project is presented in Table 6.

**Table 6: Area of Influence – Social Components**

ESIA Component	Aol
Socioeconomical	Aol includes Kadıköy, Demirli, Gölcük, Subaşı villages
Cultural Heritage	Aol includes the Project footprint

The Social Area of Influence of the Project is given in Figure 3.



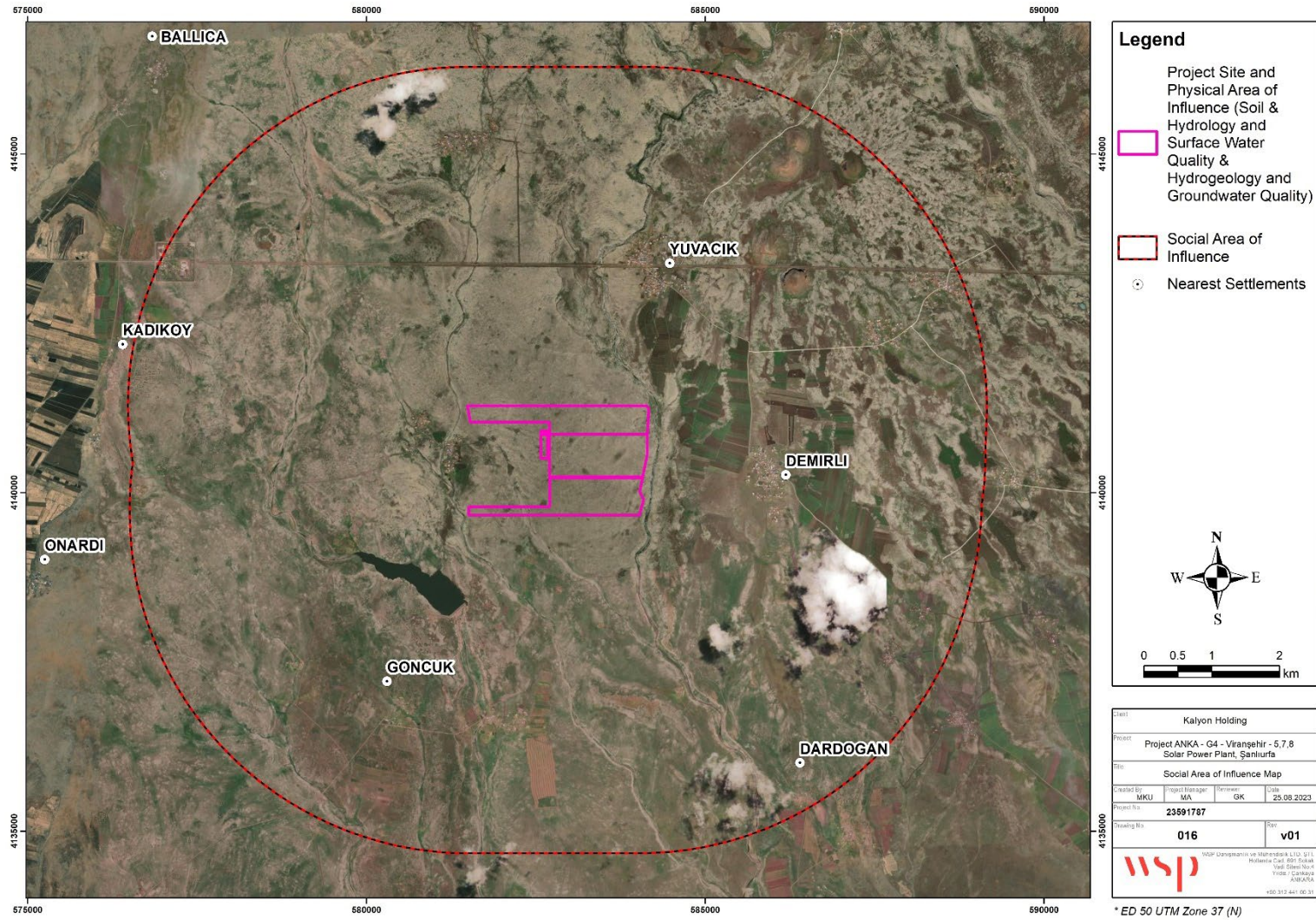


Figure 3: Area of Influence of the Project



## 6.1.2 Field Studies

Community level surveys were conducted with the Mukhtars of the villages in the social Aol that bear the potential to be impacted by the Project via phone calls, which are presented in Table 7. The land on which the project will be construct is within the boundaries of Kadıköy village. A face-to-face community level survey conducted with the mukhtar of this settlement.

**Table 7: Community Level Surveys conducted by WSP Türkiye**

Province	District	Village	Date	Survey
Şanlıurfa	Viranşehir	Kadıköy	20.04.2023	Community Level Survey conducted with the Mukhtar of Kadıköy village.
Şanlıurfa	Viranşehir	Subaşı	28.08.2023	Community Level Survey conducted with the Mukhtar of Subaşı village.
Şanlıurfa	Viranşehir	Gölcük	28.08.2023	Community Level Survey conducted with the Mukhtar of Gölcük village.
Şanlıurfa	Viranşehir	Demirli	28.08.2023	Community Level Survey conducted with the Mukhtar of Demirli village.



**Figure 4: Photo from the field surveys performed by WSP Türkiye**

## 7.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement programme aims to inform, disclose, and consult with all stakeholders using the various engagement tools. Different engagement tools are proposed to ensure Informed Consultation and Participation during the Project implementation in a culturally appropriate manner, respectful of human rights and considering gender inclusion.

Following the approval of the Project documentation, including but not limited to, the ESIA, NTS, RAP and the other supporting management plans, will be disclosed on the Project's website, and the hard copies of the NTS and SEP will be provided to the affected Mukhtars for the distribution to the PAPs. The NTS will cover the following:

- Brief description of the Project,

- Project timeline,
- Information on environmental and social studies carried out to date,
- Impact summary and mitigation measures,
- Tools for the submission of grievances, comments, and feedback.

## 7.1 Proposed Strategy for the Information Disclosure

Full ESIA, SEP and other management plans will be disclosed electronically on the websites of the Project and will be available in Turkish and English. In addition, hard copies of the SEP and NTS will be available in the mukhtars' offices in the affected settlements.

Further announcement regarding the Project updates and awareness, following tools will be used:

- Project website,
- Social media,
- Local and Regional media
- The notice boards of the mukhtars' offices, and
- Leaflets and banners.

All NGOs and associations, and other interested organizations, identified in Table 4 will be notified on the disclosure process and the relevant website links of the Project documents will be shared with them. When required, copies of the disclosure package will be sent as an e mail or hard copies of the disclosure package will be sent via post mail.

ESIA disclosure notifications will be published in the local and regional media.

During the Project development and construction phase, the CLOs will prepare monthly reports that present the project's social performance and the engagement activities and the grievance mechanism outputs.

ESIA Feedback Form is presented in APPENDIX A.

## 7.2 Proposed Strategy for Consultation

This SEP is developed to engage with the stakeholders during the Project's pre-construction (including planning), construction and operation phases to inform stakeholders on the Project activities, resolve their grievances, and involve stakeholders during the decision processes in a participatory approach. In order to establish sound stakeholder engagement activities following consultations strategies will be applied from the early phases of the Project as:

- Women CLOs will be hired to encourage the participation of women, receive and report gender-specific grievances, and conduct "Women Only" consultation activities when required. During the Project process, one of the environmental engineers at the Project area is a woman. She will be contacted to encourage women's participation, to receive and report gender-specific complaints, and to conduct "Women Only" advisory activities as needed.
- Targeted consultations will be carried out with the identified vulnerable people to ensure their participation during the information disclosure, engagement and grievance management.
- All proposed channels will provide the names of the CLOs, the contact details and the grievance mechanism.

Consultation Meeting Form and Consultation Meeting Register of the Client used for the Project ANKA and will be adapted to the Project is presented in APPENDIX B and APPENDIX C, respectively.

### 7.3 Proposed Programme for Project Phases

Pre-construction phase activities will focus on disclosing the Project information, including the construction schedule and land entry topics.

With ESIA development, ESMS and related management plans will be produced and the ESMS will be structured to reduce the impacts of labour and working conditions, community health and safety, transportation etc. during construction phase. Construction phase engagement activities will focus on the minimisation of the Project related construction impacts. During the construction phase, the environmental and social management system will be structured to reduce the impacts of labour and working conditions, community health and safety, transportation impacts are mitigated with the implementation of the relevant management plans by contractors and subcontractors. The SEP will be updated based on the feedbacks received during ESIA disclosure period. The identified stakeholders will be re-assessed, and stakeholder list will be updated when necessary. Stakeholder engagement activities will be conducted regularly during the construction phase to inform stakeholders about the status of Project-related activities. Special works (cut of energy resources, disruptions in public roads etc.) within the scope of construction activities will be communicated to the stakeholders by CLOs.

Pre-construction phase activities will focus on disclosing the Project information, including the Project route, construction schedule, land acquisition and land entry topics.

With ESIA development, ESMS and related management plans will be produced and the ESMS will be structured to reduce the impacts of labour and working conditions, community health and safety, resettlement and economic displacement, transportation etc. during construction phase. Construction phase engagement activities will focus on the minimisation of the Project related construction impacts. During the construction phase, the environmental and social management system will be structured to reduce the impacts of labour and working conditions, community health and safety, resettlement and economic displacement, transportation impacts are mitigated with the implementation of the relevant management plans by contractors and subcontractors. The SEP will be updated based on the feedbacks received during ESIA disclosure period. The identified stakeholders will be re-assessed, and stakeholder list will be updated when necessary. Stakeholder engagement activities will be conducted regularly during the construction phase to inform stakeholders about the status of Project-related activities. Special works (blasting, cut of energy resources, disruptions in public roads etc.) within the scope of construction activities will be communicated to the stakeholders by CLOs.

The Stakeholder Engagement Programme is presented in Table 8.

**Table 8: Stakeholder Engagement Programme**

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
Before Construction	Project Affected People (Land users Residents of the settlements in the Area of influence Vulnerable people	ESIA Disclosure	The Mukhtars and settlements to be informed. Project website, Social media, Local and Regional media When required copies of the disclosure package will be sent as an e-mail or hard copies of the disclosure package will be sent via post mail.	Covering all Aol	Before construction	Kalyon Enerji EPC
	Project Affected People (land users, Residents of the settlements in the Area of Influence) Vulnerable people	Community health and safety issues, Measures to be applied for the prevention of traffic due to construction works.	All necessary legal permits shall be obtained, Pre-construction survey, Consultation meetings.	Settlements of Kadıköy Demirli Subaşı Gölcük  Project office as per the request of the PAPs	Before construction	Kalyon Enerji EPC

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	Project Affected People (Land users, Residents of the settlements in the Social Aol) Vulnerable people	Introduce CLOs of Kalyon and their responsibilities and contact details, Project update Stakeholder grievance mechanism process, Local employment and procurement, Vulnerability and gender issues, Community health and safety issues.	Public meetings, Training/workshops, Public notices, Electronic publications via online/social media and press releases, Distribution of the hard copies of the Project documents to Mukhtar offices, Media announcements Information leaflets and brochures, Women-only focus group discussions.	In each settlement  Project office as per the request of the PAPs	Before construction	Kalyon Enerji EPC
	Governmental Parties Municipalities Governors District authorities Academic institutions	Environmental and Social Impacts of the Project and the mitigation measures, Stakeholder engagement and the grievance mechanism processes.	Individual meetings General meetings Official correspondence Mail, phone calls	Institution visits  Project office as per the request of the stakeholders	When required	Kalyon Enerji EPC
	Non-governmental Parties Press and media, NGOs, Businesses and business organisations, Workers' organisations,	Environmental and Social Impacts of the Project and the mitigation measures, Stakeholder engagement and the grievance mechanism processes.	General Public meetings, Press releases, Information leaflets and brochures, Audio-visual materials.	Institution visits  Project office as per the request of the stakeholders	In each Project phase and when required	Kalyon Enerji EPC

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
Construction	Project Affected Parties - Project Affected People Residents of the people in the Project Aol Vulnerable groups Local businesses	Update of information on the updated construction status, Construction-related grievances, Environmental and social awareness, Construction phase E&S impacts, Community health and safety issues, Local employment, Impact on livelihoods due to construction, Construction updates and construction schedule.	General Public meetings, Continuous communication with the Project CLOs, Training, Women-only focus group discussions, Phone notifications, Social media, Press release, Grievance mechanism, Project website.	In each settlement  Project office as per the request of the PAPs	Quarterly meetings in all affected settlements	Kalyon Enerji EPC Subcontractors
	Other Interested Parties Governmental intuitions National and local media Non-governmental institutions Business organisations	Environmental and social awareness, Construction phase E&S impacts, Community health and safety issues, Local employment, Impact on livelihoods due to construction, Construction updates and construction schedule	General information meetings, Press release, Institution visits, Grievance mechanism.	Institution visits  Project office as per the request of the stakeholders	Biannual meetings When required	Kalyon Enerji EPC Subcontractors
	Project Affected People (Land users, residents of the settlements in the Area of influence) Vulnerable people	Community health and safety issues, Measures to be applied for the prevention of traffic due to construction works.	Post-construction building condition surveys, and compensation provided by Kalyon when necessary, Grievance records related to the traffic.	Settlements of Kadıköy Demirli Subaşı Gölcük	During construction and operation	Kalyon Enerji EPC

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
Operation	Project Affected Parties - Project Affected People Residents of the people in the Project Aol Vulnerable groups Local businesses	The transition process from the construction and operation phase, Introduce operation phase CLOs, Operation phase E&S issues, especially community health and safety, Information disclosure on national and local media, Brochures and information banners at the stations.	General information meetings, Workshops, Individual meetings, Press releases, Grievance mechanism.	In each settlement  Project office as per the request of the PAPs	Following the completion of the construction	Kalyon Enerji
	Other Interested Parties (External) Governmental and Non-governmental bodies Local businesses	Information disclosure on national and local media, Brochures and information banners at the stations.	Press releases, Grievance mechanism.	Institution visits  Project office as per the request of the stakeholders	Following the completion of the construction	Kalyon Enerji

## 8.0 GRIEVANCE MECHANISM

A grievance is considered any complaint or opinion (including comments/feedback/questions/suggestions/request) regarding the execution of the Project and impacts from project activities. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies. The objectives of the grievance mechanism are to:

- Provide affected people with culturally appropriate ways and means of stating their grievances during the Project (from site preparation to decommissioning phase),
- Ensure that grievances are treated confidentially and are not shared outside the process,
- Establish transparent and mutually respectful relations with communities,
- Ensure that corrective actions are identified and taken,
- Verify that affected people are satisfied with the corrective actions taken; and
- Avoid the need for judicial actions; the grievance mechanism, however, does not prevent stakeholders from accessing the judiciary system.

The Grievance mechanism has been developed for the Project ANKA by Kalyon Enerji a part of the ANKA SEP of the Project, explaining the management process that will ensure that the complaints of the stakeholders are resolved in a healthy, correct and timely manner. The details about the grievance mechanism implemented for the Project ANKA and will be adapted to the Project presented in the following sections.

### 8.1 Governmental Grievance Mechanism- all stakeholders

The public can raise any issues, complaints and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and government open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints and requests can be both received and responded to through this national online system.

Still, a separate grievance mechanism system has been established for the Project ANKA and will be adapted to the Project in which the stakeholders can receive their responses locally and communicate their complaints. Complaints received will be forwarded to the relevant government departments and followed up.

### 8.2 Internal Grievance Mechanism – for Workers

The internal grievance mechanism of Kalyon Enerji (developed for ANKA Project) will be adopted for the Project. All direct and indirect Project workers will follow this procedure. The procedure defines grievances as a statement of dissatisfaction over any condition that allegedly harms the employee. A grievance may relate to matters involving internal communication, responsibilities abuse, abuse in the authority line, race, colour, ancestry, national origin, religion, age, sex, sexual orientation, gender identity, sexual harassment, or disability status.

In case requested, all grievance holders will have the right to remain anonymous and maintain their confidentiality. Kalyon Enerji will not disclose any grievance holder's credentials without ensuring their consent first. If such consent is given, only the managers and personnel related to that specific grievance will be informed.



Employee Request and Grievance Register of Kalyon Enerji used for the ANKA Project and will be adapted to the Project is presented in APPENDIX D, respectively.

### 8.3 External Grievance Mechanism – for communities

An external grievance mechanism of Kalyon Enerji will be adopted for the Project. External grievance mechanism is a part of the management system and it is responsive to any concerns and complaints, particularly from affected stakeholders and communities. Special care will be focused on training the designated staff involved in the management of the grievance mechanism. The overarching aim of this grievance mechanism is to provide all stakeholders with the opportunity to obtain information about Kalyon's activities and facilities, deliver their complaints and requests in a structured and formal manner and receive prompt, fair and effective responses.

Any comments or concerns will be brought to the Company's attention verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Company website, at the Project site, at the mukhtar's office, alongside a description of the grievance mechanism. Grievance forms can then be submitted to the contact points whose details are provided in LIABILITIES. All grievances will be:

- Acknowledged within seven days after receipt; and
- Responded no later than within 30 days after receipt.

Specifically, nominated and trained members of staff will record grievance information in a grievance register the information in the grievance register will include Stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out. The process is elaborated in Figure 5 below.

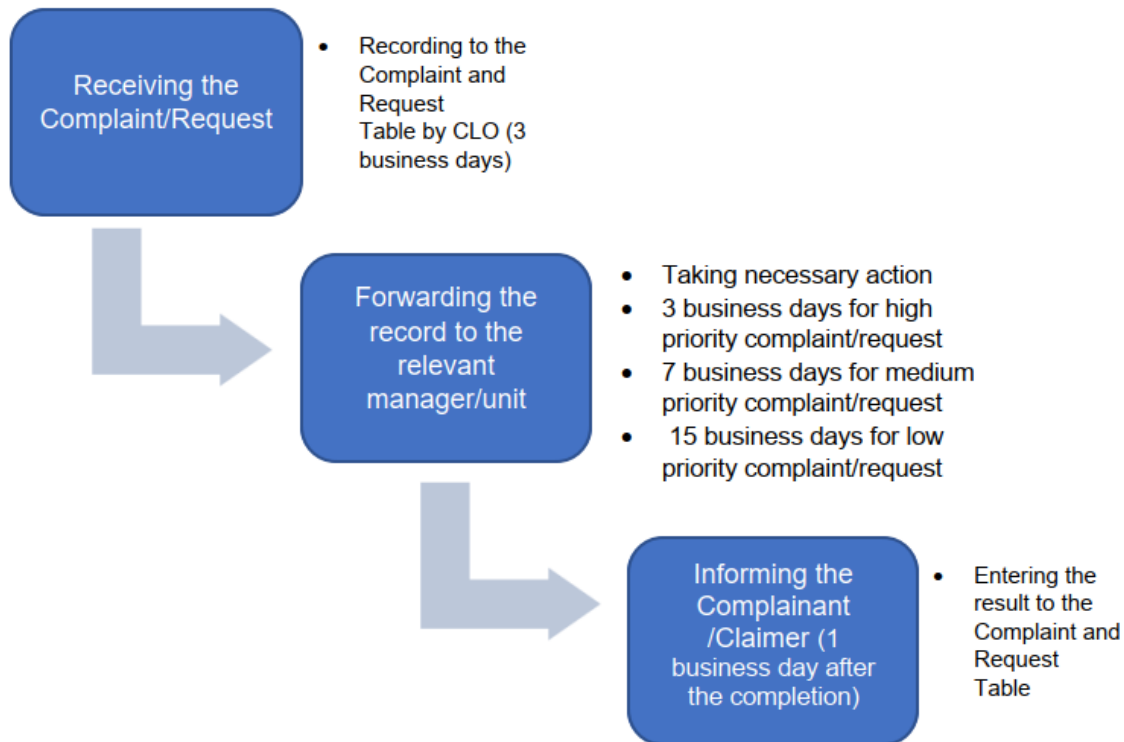


Figure 5 Grievance Management Procedure

Individuals can request the right to have their names kept confidential, and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

- Step 1: receipt of grievance and registering of grievance (3 business days),
- Step 2: assessment,
- Step 3: acknowledgement of grievance (acknowledged within seven days after receipt),
- Step 4: investigation and resolution of grievance,
- Step 5: closure; and (30 business days)
- Step 6: outcome of the corrective action (1 business day after completion).

### Appeals Committee

In case the complainants are not satisfied with the decision of Kalyon Enerji and/or EPC on their complaints, they can refer to the Appeals Committee via Kalyon Enerji social impact team.

Appeals Committee consisting of Kalyon Enerji management teams is responsible for ensuring grievance mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

The mandate of the Appeals Committee covers considering complaints on the issues listed below (excluding those related with Labour Law and Expropriation Law):

- Unsolved grievance related to damage to environment,
- Unsolved grievance related to damage to public assets and infrastructure,
- Unsolved grievance related to damage to private assets (land, crops, houses etc.),
- Unsolved grievance related to impacts on livelihood,

The Appeals Committee carries out the following tasks:

- Meeting at least once a month or more often depending upon the existence of unresolved disputes,
- Reviewing the complaints by hearing both complainants and Kalyon Enerji and/or EPC
- Investigating the complaints in accordance with project requirements, Kalyon Enerji Policies, legal framework and referring to relevant expertise where required,
- Preparing an evaluation report based on the inquiries,
- Making a proposal on resolution of the disputes between parties.

The decision of the Appeals Committee is not binding and if parties do not agree on the Appeals Committee proposal, they still have the opportunity to either negotiate or litigate.

The Appeals Committee consists of the following members:

- Chief Sustainability Officer
- Chief Operation Officer
- Chief Legal and Compliance Officer
- Chief Business Development Officer
- Chief Finance Officer

- Social Impact and Inclusion Manager (secretary)
- Human Resources Manager (secretary)
- Subject Matter Expert, if required

The grievance mechanism is widely announced to the public with stakeholder meetings held for project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism that also allows anonymous grievances.

Gender equality is observed by Kalyon Enerji. There is a woman environmental engineer in the Project. She will deal with the complaints and demands of women in the Project area. The grievances will be reviewed by the team according to the Project human rights and grievance mechanism.

Stakeholder Request and Grievance Form and Stakeholder Request and Grievance Register of Kalyon Enerji used for a previous project and will be adapted to the Project is presented in APPENDIX E and APPENDIX F, respectively.

## 9.0 MONITORING

The monitoring measures are to be implemented throughout the Project phases to assess compliance of the SEP with the Project standards. The stakeholder engagement process of the Project will be monitored periodically, as indicated in Table 9. According to the outputs of the monitoring indicators, the SEP need to be updated to implement necessary corrective actions during the different stages of the Project. The monthly summaries, statistics of the consultation activities and grievances will be provided to the Corporate Sustainability Team of Kalyon Enerji by CLOs during the construction phase with the assistance of Kalyon Enerji.

The stakeholders will be engaged during the construction and operation phases of the Project on the Project environmental and social impacts. Kalyon Enerji will continue to engage with and provide information to project-affected parties and other interested parties throughout the different phases of the Project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the Project.

Additional information may need to be disclosed at key stages in the Project cycle, for example prior to start-up of operations, and on any specific issues that the disclosure and consultation process or grievance mechanism has identified as of concern to stakeholders.

As implementation of a project progresses, new impacts may arise, while other impacts may be eliminated. Kalyon Enerji will provide regular updates to stakeholders on project environmental and social performance (environmental measurement results, grievance resolution processes) and schedule.

Kalyon Enerji will continue to conduct stakeholder engagement in accordance with the SEP, in particular, the feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures.

If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, Kalyon Enerji will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. Kalyon will disclose an updated environmental and social management plan, setting out any additional mitigation measures.

During the operation phase, Kalyon Enerji will be responsible for managing and monitoring the SEP.

Monthly summaries will be used to assess:

- Transparency and accessibility of the engagement process,

- Provision of relevant information,
- Timeliness in responding (ongoing communication),
- Clarity and simplicity of the information provided,
- Project impacts; and
- Applicability and relevance of the information provided.

The SEP will be reviewed annually and updated if required. A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. The KPIs for an effective stakeholder engagement process that will be assessed during the monitoring process are presented below.

**Table 9: Key Performance Indicators (KPIs)**

ID	KPI	Target	Monitoring Measure
Consultation and Information Disclosure			
SEP-KPI-01	Number of stakeholder engagement activities	Target of 100%	Consultation Meeting Register
Implementation of Grievance Mechanism			
SEP-KPI-02	Number of complaints/ grievances received from community	The target of 100%	Request and Grievance Register
SEP-KPI-03	Number of complaints/grievances responded to within targeted time frame	The target of 100%	Request and Grievance Register
SEP-KPI-04	Number of unresolved grievances conveyed to Appeals Committee	The target of 100%	Grievance Register
SEP-KPI-05	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame	Audit report
SEP-KPI-06	Disclosure of Project's annual Environmental and Social Monitoring Report	Project's Annual Environmental and Social Report will be disclosed that includes; Environmental Performance Management; Water Management, GHG Emissions and Energy Monitoring, Noise Management, Waste Management, Biodiversity Conservation, and Social Performance Management; Stakeholder Engagement, Community	Annual Environmental and Social Report (AESMR)

ID	KPI	Target	Monitoring Measure
		Development Program, Community and Occupational Health and Safety	

## 10.0 REPORTING

Monthly summaries of grievances raised by internal and external stakeholders, queries and related incidents, and the implementation status of corrective/preventive actions, consultations, and disclosure activities will be referred to the Kalyon Enerji in all phases of the Project and the construction period. Monthly summaries will be used to assess both the number and nature of complaints/grievances (if any), along with the the Kalyon Enerji's ability to address complaints in a timely and effective manner.

The Request and Grievance Register (both for internal and external stakeholders) will be kept updated by CLOs all the time.

To inform the external stakeholders AESMR will be developed and published on the Project's website.

The annual AESMR will include the followings.

- Project progress details,
- Status of the ESAP implementation,
- Environmental monitoring data results (waste, air, etc.)
- Resource utilisation and product output,
- Human resource management, (number of workers, women workers, local workers etc.)
- Occupational Health and Safety,
- Stakeholder Engagement
  - Meeting or other initiatives to engage with members of the public or public organisations during the report period,
  - Information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues
  - Coverage in media,
  - Interaction with any environmental or other community groups, NGOs etc., and
  - Complaints/grievances that the Project received from members of the public or civil society organisations during the reporting period.

Brief NTS of AESMR will be shared with affected parties (e.g., via mukhtars' offices) in addition to hard copies of full AESMRs.

**Table 10: Monitoring Time Frame**

Monitoring Type	Frequency	For	Content
Reporting	Monthly	Project management	Detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting	Annually	Project management	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Performance Monitoring	Biannual	Project management	Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of stakeholders/PAPs consultations/meetings
Impact Monitoring	Biannual	Project management	Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions

## 10.1 Reporting Back to Stakeholder Groups

The monitoring process of the stakeholder engagement process will be comprised of two main components including the consultation and information disclosure and the grievance mechanism.

The company will use, two main tools to ensure the involvement of the stakeholders to the monitoring process. The monthly reports that will be prepared by the Project CLOs contains detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance will be published in the Project website quarterly and anonymously.

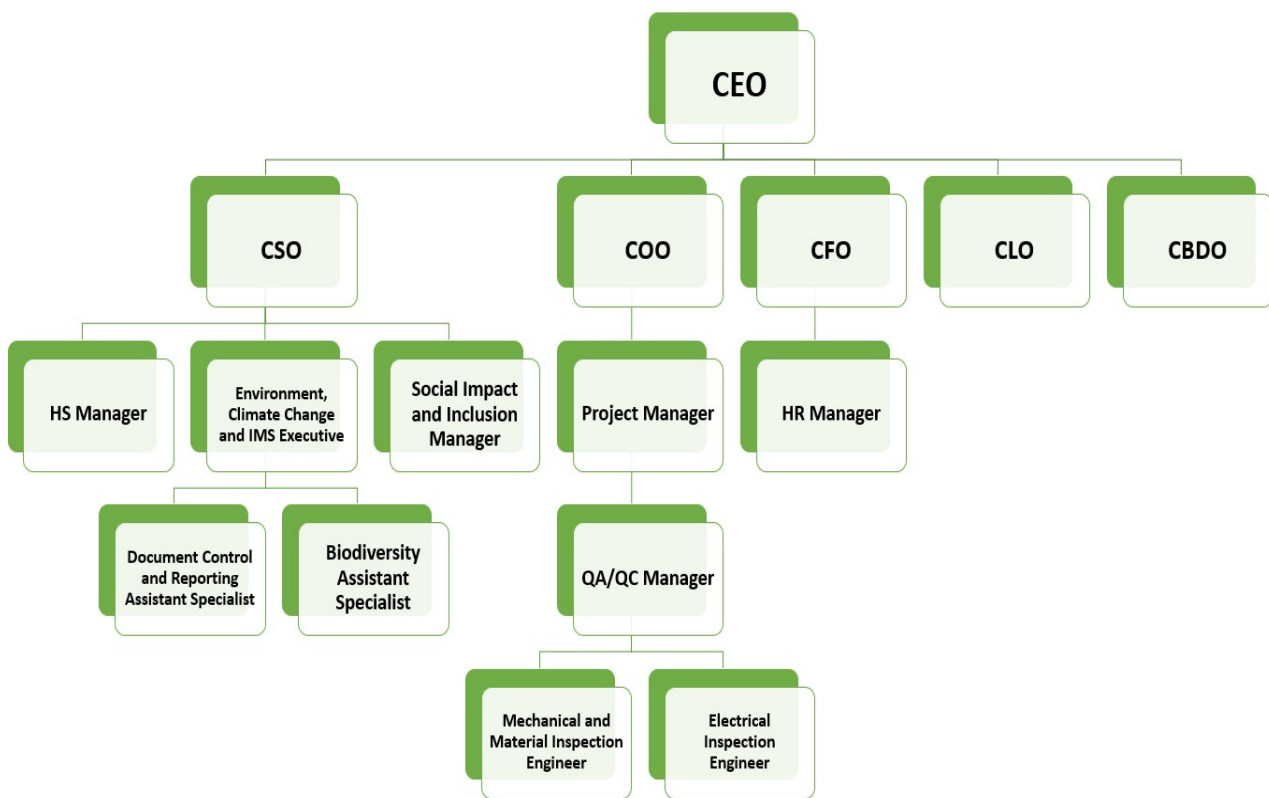
In addition annual environmental and social report of the Project will contain details of meeting or other initiatives to engage with members of the public or public organisations during the report period, information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues, coverage in media and interaction with any environmental or other community groups many complaints or grievances did the Project receive from members of the public or civil society organisations during the reporting period and Community Interaction and Development.

The hard copies of the annual reports will be distributed to Mukhtars.

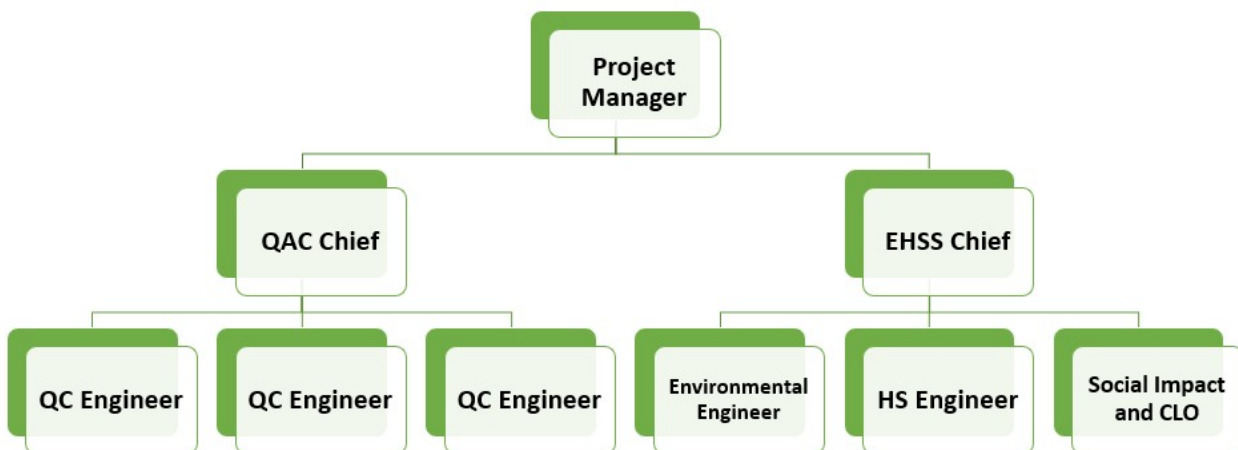
On the website of the Project and the annual reports will have the feedback mechanism for the comments of the stakeholders on the monitoring process.

## 11.0 ROLES AND RESPONSIBILITIES

During the construction phase of the Project, the following roles and responsibilities will be implemented by Kalyon Enerji. The organisation charts of Kalyon are given in Figure 6 and Figure 7.



**Figure 6: Client Organization Structure**



**Figure 7: EPC Organization Structure**

The roles and responsibilities adopted by Kalyon for the Project phases are presented in Table 11.

**Table 11: Roles and Responsibilities**

<b>Roles</b>	<b>Responsibilities</b>
Kalyon Enerji Chief Sustainability Officer	Approval of this Plan. Ensure adequate resources are provided with respect to sustainability requirements.
Kalyon Enerji Chief Operation Officer	Ensures implementation of this Plan at the Project level. Ensure adequate resources are provided with respect to Project requirements.
Kalyon Enerji Project Manager	Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Monitor the E&S performance of the Plan at the Project level
Kalyon Enerji Social Impact and Inclusion Manager	Responsible for the corporate communication strategy for stakeholders, attends meetings with the stakeholders if required, and ensures compliance with the Stakeholder Engagement Plan. Manage, improve, monitor and update this Plan. Ensure technical support is provided to EPC and its sub-contractor for implementation of the Plan. Ensure Stakeholder Engagement and GRM are understood by all employees. Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures. Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan. Conduct/organize periodic audits.
Kalyon Enerji HS Manager	Ensure health and safety practices are implemented, by workers and EPC and its sub-contractors.
Kalyon Enerji Environment, Climate Change, and IMS Executive	Ensure environmental and biodiversity practices are implemented by workers and EPC and its sub-contractors.
EPC Project Manager	Ensure adequate resources are provided for implementation of this Plan Ensure that this Plan is compliant with the national, international requirements and the Project's applicable standards. Appoint a responsible person/s for activities defined in this Plan.
EPC EHSS Department	Ensure this plan is implemented according to the Project standards. Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions. Ensure all relevant topics followed are reported to Kalyon Enerji Obtain data from sub-contractors regarding activities defined in this Plan. Organize trainings related to this Plan. Conduct periodic internal audits. Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required). Conduct periodical site visits/audits. Ensure site activities are implemented according to applicable H&S requirements. Engage and inform local communities with respect to Project implementations that would impact on them and assist in delivering the Stakeholder Engagement activities. Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.



Roles	Responsibilities
EPC Personnel Affairs Chief	<p>Maintain HR records.</p> <p>Process HR transactions.</p> <p>Regulatory compliance related to recruitment, employment and training.</p> <p>Report to government and other bodies on compliance with commitments and on other occasions as required by legislation.</p> <p>Organize the trainings related to this procedure for the personnel they are responsible for this Plan.</p> <p>Develop internal audit check list, perform regular inspections/audits, maintain records and report back to Kalyon Enerji on the outcomes of the inspections/audits</p>
Community Liaison Officers	<p>Review the Grievance tracking system weekly</p> <p>Prepare monthly reports on the grievances and the stakeholder engagement activities monthly</p> <p>Report to E&amp;S Manager</p> <p>Work in cooperation with other departments to determine targets for Environmental, Social, health and safety issues</p> <p>Keeping the record of the grievances in the Request and Grievance Register with details (raised by who, date, status (open, awaiting or closed) etc.)</p> <p>Supporting E&amp;S Manager on the first evaluation of the relevance of grievances collected</p> <p>Ensure all complainants are informed within one week, and complaints are resolved within one month</p> <p>Provide regular reporting back to the community on the community grievances</p> <p>Record all formal and informal engagement activities with local communities in the stakeholder management system</p> <p>Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted into stakeholder engagement quarterly reports</p> <p>Monitor and record the social responsibility activities carried out in the scope of the Project, and these records will be inserted into stakeholder engagement quarterly reports</p> <p>Being in contact with stakeholder meetings to collect the responses to grievances actively</p>
Security	<p>Control incoming and outgoing traffic at all times.</p> <p>Report all security issues to the EHSS Chief</p> <p>Involve in the investigation team for the investigation of the security incidents.</p> <p>Propose and implement necessary new security measures as needed in cases such as changed circumstances or other threat perceptions.</p> <p>Ensure all mitigation measures and management controls are implemented properly.</p> <p>Ensure that only properly trained and qualified security personnel are employed.</p> <p>Ensure that visitors and delivery vehicle drivers are aware of site rules, restrictions and safety considerations.</p>
Sub-contractors	<p>Develop its own procedure to fully implement this Plan.</p> <p>Ensure compliance with Project standards and contractual agreements.</p> <p>Ensure related non-compliances are recorded and responded to immediately.</p> <p>Conduct internal audits and record identified incompliances.</p> <p>Provide related trainings.</p> <p>Appoint a responsible person for activities defined in this Plan.</p> <p>Provide staff, equipment and material for the implementation of measures defined in this Plan.</p>

Roles	Responsibilities
	Ensure activities defined in this Plan are documented in the periodic HSSE review and incident reports.
All Employees	Participate in the trainings. Ensure compliance with measures defined in this Plan.

## 12.0 LIABILITIES

A team was assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management for the construction phase of the Project.

**Project website:** kalyonenerji.com

**Address:** Ehlbeyt Mahallesi Mevlana Bulvarı No:201 Balgat-Çankaya/ANKARA

**Hotline:** +90 536 271 81 13

**e-mail:** enerji-iletisim@kalyonenerji.com

**For the grievances and the requests related with the Project please contact:** Site Social Impact Specialist and CLO Mehmet Yüksekayla [myuksekyayla@kalyonholding.com](mailto:myuksekyayla@kalyonholding.com)

For the operation phase of the Project, a separate team will be assigned to perform the stakeholder engagement activities. These activities include identification of stakeholders, update stakeholder list, disclose Project related information, conduct consultation with the target stakeholder groups with the identified tools, manage the external grievances and report to top management periodically.

## 13.0 REFERENCES

- **IFC Performance Standards 2012:**  
[https://www.ifc.org/wps/wcm/connect/Topics\\_Ext\\_Content/IFC\\_External\\_Corporate\\_Site/Sustainability-At-IFC/Policies-Standards/Performance Standards](https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance Standards)
- **Equator Principles 2020**  
<https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>
- Official EIA Decision letters of Project ANKA (Section 1 and Section 2))
- Kalyon Enerji's Policies
- Integrated Management System Policy
- Health and Safety Policy
- Environment and Climate Change Policy
- Social Impact and Human Right Policy
- Human Resources Policy



# Signature Page

## WSP Danışmanlık ve Mühendislik Ltd. Şti.

Elçin Kaya, Esra Güven  
*Sociologist, Sociologist*

Merve Acırlı  
*Project Manager*

EK/EG/MA

Registered in Turkey Registration No. 53/3069

**APPENDIX A**


# ESIA Feedback Form

You can write your questions and opinions about the Environmental and Social Impact Assessment study prepared Project to the following addresses.

ESIA Feedback Form	
Name-Surname	
Address	
Phone Number	
Date	
Concerns, expectations, questions or complaints on the ESIA report	

**APPENDIX B**

# Consultation Meeting Form

	<b>PAYDAŞ İLETİŞİM FORMU</b>		Doküman No: Yayın Tarihi: 21.09.2020 Rev No: 00 Rev. Tarihi: -	
<b>İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)</b>				
<b>Tarih:</b>				
<b>İrtibat Bilgisi: (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz)</b>				
Posta yolu ile .....				
Telefonla .....				
E-posta yolu ile.....				
<b>Tepkinizi belirtin:</b> <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet		<b>Doldurulmuş İletişim formu suretinin alındığını teyit eden imza</b> .....		
<b>Kaydeden:</b> <input type="checkbox"/> Yorum/ şikayeti sunan kişi				
<input type="checkbox"/> Diğer (lütfen kim olduğunu belirtin)				
<b>PROJE HAKKINDAKİ YORUMLARINIZ (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>				
<b>YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER</b>				
<b>Yorum/Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>				
<b>Yorum/Şikayetle İlgili Olay Tarihi</b>				
<input type="checkbox"/> Tek seferli olay / şikayet (Tarih: ..... )				
<input type="checkbox"/> Bir defadan fazla mı oldu (Kaç kez? ..... )				
<input type="checkbox"/> Devam ediyor (Problem halen yaşanıyor)				
<b>Problemi çözümlmek için ne öneriyorsunuz? (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>				
<b>Bu kısım Proje Yönetimi tarafından doldurulacaktır.</b>				
<b>YORUM DURUMU</b>				
<b>Yorum Kayıt (E/H)</b>		<b>Sunum tarihi:</b>		
<b>Gerekli Tepki (E/H)</b>		<b>Kaydeden:</b>		
<b>ŞİKAYETÇİ DURUMU</b>		<b>Müdahale tarihi:</b>		
<b>Şikayet Kayıt (E/H)</b>		<b>Kaydeden:</b>		
<b>Cevap Gönderim Tarihi:</b>		<b>Şikayet kapatıldı (E/H):</b>		
		<b>Kapama tarihi ve imzası:</b>		
<b>İrtibat Numarası</b>		<b>0536 271 81 13</b>		



**APPENDIX C**

## Consultation Meeting Register

[illegible]


**APPENDIX D**

**Employee Request and  
Grievance Register**

NO	CONTRACTOR	TYPE	SUBJECT	POSITIVE/NEGATIVE EVIDENCE	OBSERVATION	RESPONSIBLE UNT	CHECKED BY	TAKEN ACTION	STATUS	REPEAT	COMPLAINT DATE	DUE DATE	CLOSING DATE	OVERDUE DAYS	OPEN FOR... DAYS	NOTES

**APPENDIX E**

**Stakeholder Request and  
Grievance Form**

	<b>PAYDAŞ İLETİŞİM FORMU</b>		Doküman No: Yayın Tarihi: 21.09.2020 Rev No: 00 Rev. Tarihi: -
<b>İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)</b>			
<b>Tarih:</b>			
<b>İrtibat Bilgisi: (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz)</b>			
Posta yolu ile .....			
Telefonla .....			
E-posta yolu ile.....			
<b>Tepkinizi belirtin:</b> <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet		<b>Doldurulmuş İletişim formu suretinin alındığını teyit eden imza</b> .....	
<b>Kaydeden:</b> <input type="checkbox"/> Yorum/ şikayeti sunan kişi			
<input type="checkbox"/> Diğer (lütfen kim olduğunu belirtin)			
<b>PROJE HAKKINDAKİ YORUMLARINIZ (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>			
<b>YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER</b>			
<b>Yorum/Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>			
<b>Yorum/Şikayetle İlgili Olay Tarihi</b>			
<input type="checkbox"/> Tek seferli olay / şikayet (Tarih: ..... )			
<input type="checkbox"/> Bir defadan fazla mı oldu (Kaç kez? ..... )			
<input type="checkbox"/> Devam ediyor (Problem halen yaşanıyor)			
<b>Problemi çözümlmek için ne öneriyorsunuz? (Gerekirse sayfanın arka kısmından devam edebilirsiniz)</b>			
<b>Bu kısım Proje Yönetimi tarafından doldurulacaktır.</b>			
<b>YORUM DURUMU</b>			
Yorum Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Gerekli Tepki (E/H)	Müdahale tarihi:		
<b>ŞİKAYETÇİ DURUMU</b>			
Şikayet Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Cevap Gönderim Tarihi:	Şikayet kapatıldı (E/H):	Kapama tarihi ve imzası:	
İrtibat Numarası		0536 271 81 13	

**APPENDIX F**

# Stakeholder Request and Grievance Register



Complaint Number	Create Date	Created By	Assigned to	Complaint Date	Current Complaint Status Open, Closed, Pending	Remaining Days	Due Date	Project Supervisor Region Subcategory Complaints	Province	District	Quarter/Village	Stakeholder	Contact Information - Phone	Contact Information - e-mail	Contact Information - Address	Gender Male Female	Stakeholder Categories Party (Municipalities or other community representatives - Project Workers - Project Subcontractor - Civil Society - Governmental Institution - Public Institutions - Media)	Block/Parcel	Relevant Stakeholders	Complaint Type	Category	Sub Category	Subject	Priority Low Medium High	Project Phase	Explanation	Project Section	Submission Type Letter Face to Face Phone CHMER Website/E-mail	Responsibility Kalyan Energy Supervision Construction Contractor	Responsible Party/ Department - Social - Environmental - HR - Construction	Attachments	Visibility	Action / Task 1 (Actions Taken to Resolve the Grievance)	Date of Action / Task 1	Status of Action / Task 1 Open, Closed	Attached relevant grievance form	Attached grievance investigation form	Attached photos if available			

## APPENDIX G

### Appeals Committee Application Form

**Doc. No:** KLYEN-G34BOR-SUS-SOC-PLN-0002**Date:** 11.07.2023**Rev. No/Date:** 01 / 11.07.2023

**Kalyon Enerji**  
**Uzlaş Komitesi Başvuru Formu**

..... / ..... / 20.....

Sayın İlgili,

..... İli, ..... İlçesi,  
..... köy/mahallesinde ikamet eden

..... olarak, Kalyon Enerji'ye ilettiğim  
..... numaralı şikayetimin çözümü konusunda aşağıda belirttiğim sebeplerden dolayı  
uzlaşma sağlayamadığımızı bildiri ve karşılıklı anlaşma ile çözüme yardımcı olunması için söz konusu şikayetin  
tekrar değerlendirilmek üzere ilgili Uzlaş Komitesi'ne iletilmesini arz ve talep ederim.

Saygılarımla,

**Uzlaşma sağlananama gerekçesi ve varsa çözüm önerisi:**

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Şikayet SahibiEPC / Yüklenici TemsilcisiKalyon Enerji Sosyal Etki ve Kapsayıcılık Müdürü

Şikayet Sahibi İletişim Bilgileri	
Adı ve Soyadı:	
TC Kimlik Numarası:	
Telefonu:	
E-Posta Adresi:	
Adresi:	



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