



ÇAYPINAR HYBRID SOLAR POWER PLANT (SPP) PROJECT

STAKEHOLDER ENGAGEMENT PLAN AND GRIEVANCE REDRESS MECHANISM



DOKAY-ÇED Çevre Mühendisliği Ltd. Şti.
Ata Mah. Kabil Cad. 140/A
06460 Çankaya/ANKARA
Tel: + (90) (312) 475 7131
Faks: + (90) (312) 475 7130

2022
ANKARA



AYEN OSTİM ENERGY INC.

STAKEHOLDER ENGAGEMENT PLAN AND GRIEVANCE REDRESS MECHANISM

JANUARY 2022

REVISION LOG

Report name	Stakeholder Engagement Plan & Grievance Redress Mechanism	Revision Number		
		0	1	2
Date	18.01.2022			
Prepared by	Deniz Çağlar Environmental Engineer – OHS Expert Dr. Lecturer Oltan Evcimen – (Erciyes University, Faculty of Literature, Department of Sociology) Berat Batuhan Kaplangı- Environmental Engineer İlhan Altıntaş- Cartographer Pelin Bekri- Sociologist			
Checked by				
Company Director	Prof. Dr. Coşkun Yurteri			

TABLE OF CONTENTS

LIST OF TABLES.....	ii
LIST OF FIGURES	ii
LIST OF ANNEXES.....	ii
LIST OF PHOTOGRAPHS	ii
ABBREVIATIONS	ii
1 SCOPE	1
2 PROJECT DEFINITION.....	2
3 NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS	6
3.1 National Legislation and Official Grievance Mechanism.....	6
3.1.1 Constitution of Republic of Turkey	6
3.1.2 Right to Information Act	6
3.1.3 Right to Petition Act	7
3.1.4 Environmental Impact Assessment Regulation	7
3.1.5 Official Grievance Mechanisms.....	7
3.2 IFC Standards	8
4 ROLES AND RESPONSIBILITIES.....	10
5 IDENTIFICATION OF STAKEHOLDERS	11
6 INFORMATION TOOLS AND METHODS	13
7 STAKEHOLDER ENGAGEMENT PROGRAM.....	14
8 GRIEVANCE REDRESS MECHANISM.....	18
9 MONITORING, AUDIT, REPORTING AND TRAINING	21
10 STAKEHOLDER MEETINGS	22
11 CONCLUDING REMARKS.....	23
ANNEXES	25

LIST OF TABLES

Table 3-1: Contact Information of Official Institutions and Municipalities.....	8
Table 4-1: Roles and Responsibilities within the scope of SEP Applications	10
Table 5-1: Stakeholder Groups Determined within the Scope of the Project.....	11
Table 7-1: Stakeholder Engagement Program.....	15
Table 10-1: Site Study Team Members	22
Table 10-2: Interviewed Stakeholders During the Meetings.....	22
Table 10-3: Stakeholder and Focus Groups Meetings Details	23

LIST OF FIGURES

Figure 2-1: Site Location Map	3
Figure 2-2: Closest Neighborhoods.....	4
Figure 2-3: Other Industrial Plants in the Region.....	5
Figure 8-1: Grievance Redress Mechanism Flow Chart	20

LIST OF ANNEXES

ANNEX-1: Internal And External Complaint / Recommendation Form	25
ANNEX-2: Photographs Taken During Stakeholder Meetings	28

LIST OF PHOTOGRAPHS

Photo-1: Interview with Ercan Kara	29
Photo-2: Interview with Gökhan Pala	29
Photo-3: Interview with Erdem Kaya	30
Photo-4: Interview with Mustafa Şen.....	30
Photo-5: Interview with Göksel Demirdağ and Local People of Saraç Neighbourhood	31
Photo-6: Interview with Dursun Çakmak	31
Photo-7: Carpet Provided to the Eşeler Mosque	32
Photo-8: Interview with Emin Eşsiz	32

ABBREVIATIONS

CIMER	: Presidential Communication Center
DOKAY	: DOKAY-EIA Environmental Engineering
EIA	: Environmental Impact Assessment
ETL	: Electric Transmission Line
ESS	: Environmental and Social Standard
GRM	: Grievance Redress Mechanism
IFC	: International Finance Corporation
MEU	: Ministry of Environment, Urbanization and Climate Change
NGO	: Non-Governmental Organization
OHS	: Occupational Health and Safety
PS	: Performance Standards
SEP	: Stakeholder Engagement Plan
SPP	: Solar Power Plant
WPP	: Wind Power Plant

1 SCOPE

The Stakeholder Engagement Plan (“SEP”) was established by taking into account the characteristics, sensitivities and socio-economic benefits of local residents and communities that may be affected by the activities to be carried out during the construction and operation phases of the “Çaypınar Hybrid SPP Project” (“Project”).

In this context, the SEP, which was prepared by considering the relevant national legislation, international standards and Ayen Ostim company policies, should be considered as a map on how Ayen Ostim will maintain its relationship with their stakeholders. The scope and main objectives of the SEP are listed below:

- Identification of the main and strategic stakeholders of the Project.
- Definition of the necessary approaches required to ensure effective communication with identified stakeholders.
- Establishing relations based on mutual trust between Ayen Ostim and the local people.
- Ensuring that stakeholders have information about the construction works and operational activities, and the possible environmental and social risks that may arise at these stages.
- Ensuring that the information and/or documents that are shared with the stakeholders are correct and clear.
- Identifying the methods and programs related to consultation processes that will be conducted with the stakeholders, especially with the sensitive groups during the construction and operation phases of the Project.
- Ensuring that all interested parties are involved in the process.
- Helping the stakeholders by recording and resolving the concerns and grievances about the Project in case they have any.

A Grievance Redress Mechanism (“GRM”) was created within the scope of the SEP in order to learn about the concerns and grievances of the stakeholders regarding the environmental and social performance of the Project and to help eliminate them. During the stakeholder engagement process, stakeholders will also be informed about the Grievance Redress Mechanism.

This SEP covers all the activities that will be conducted during both the construction and operation phases of the Project. Besides, SEP is a vital document, and it will be monitored, and updated by Ayen Ostim in all stages of the Project. Within this framework, if necessary, the SEP will be revised to include stakeholder engagement meetings and other relevant activities.

2 PROJECT DEFINITION

Ayen Ostim Energy Production INC. (“Ayen Ostim”) is planning to construct and operate Çaypınar Hybrid Solar Power Plant Project (“Project”) in addition to the existing Çaypınar Wind Power Plant in order to increase their own energy production capacity from 25.2 MWm / 24 Mwe to 30,7 MWm / 24 MWe in Balıkesir Province Kepsut District.

In the scope of the Project, 13,752 solar panels will be established. Existing switchyard and energy transmission line (“ETL”) will be used for energy transfer. Annual additional electricity generation of the solar power plant is foreseen as 8,974,100 kWh with the completion of the Project.

The Çaypınar WPP project has been established and the personnel needs for the construction and operation phases of the solar power plant project will be met from the existing wind power plant. In order to meet the social needs of the personnel, the Çaypınar WPP Project includes a social facility, administrative building, and an impermeable septic tank. Within the scope of the Project, no other area other than solar panels will be created. Mentioned areas will be defined as “Project Area” in the studies.

The map showing the area covered by the Project is given in Figure 2-1.

The closest settlements to the Project Site and their distances to the Project Site are as follows; (i) Servet District (2000 m), (ii) Saraç District (3100 m), (iii) İhsaniye District (3500 m), (iv) Eşeler District (2500 m), (v) Akarsu District (2500 m), (vi) Recepköy District (2750 m), and (vii) Karakaya District (4350 m).

The locations of the neighborhoods with respect to Project Area are given in Figure 2-2.

The closest industrial plants to the Project area are shown in the satellite image in Figure 2-3.

During the construction and operation phase of the Project, all measures will be taken in terms of environmental and human health, and all legal permits will be obtained without disturbing the existing ecological balance.

Solar energy is preferred since it is easy to use, environmental friendly, and a clean energy resource. The fact that SPP production costs are lower than other energy sources make the SPPs one of the sustainable energy resources.

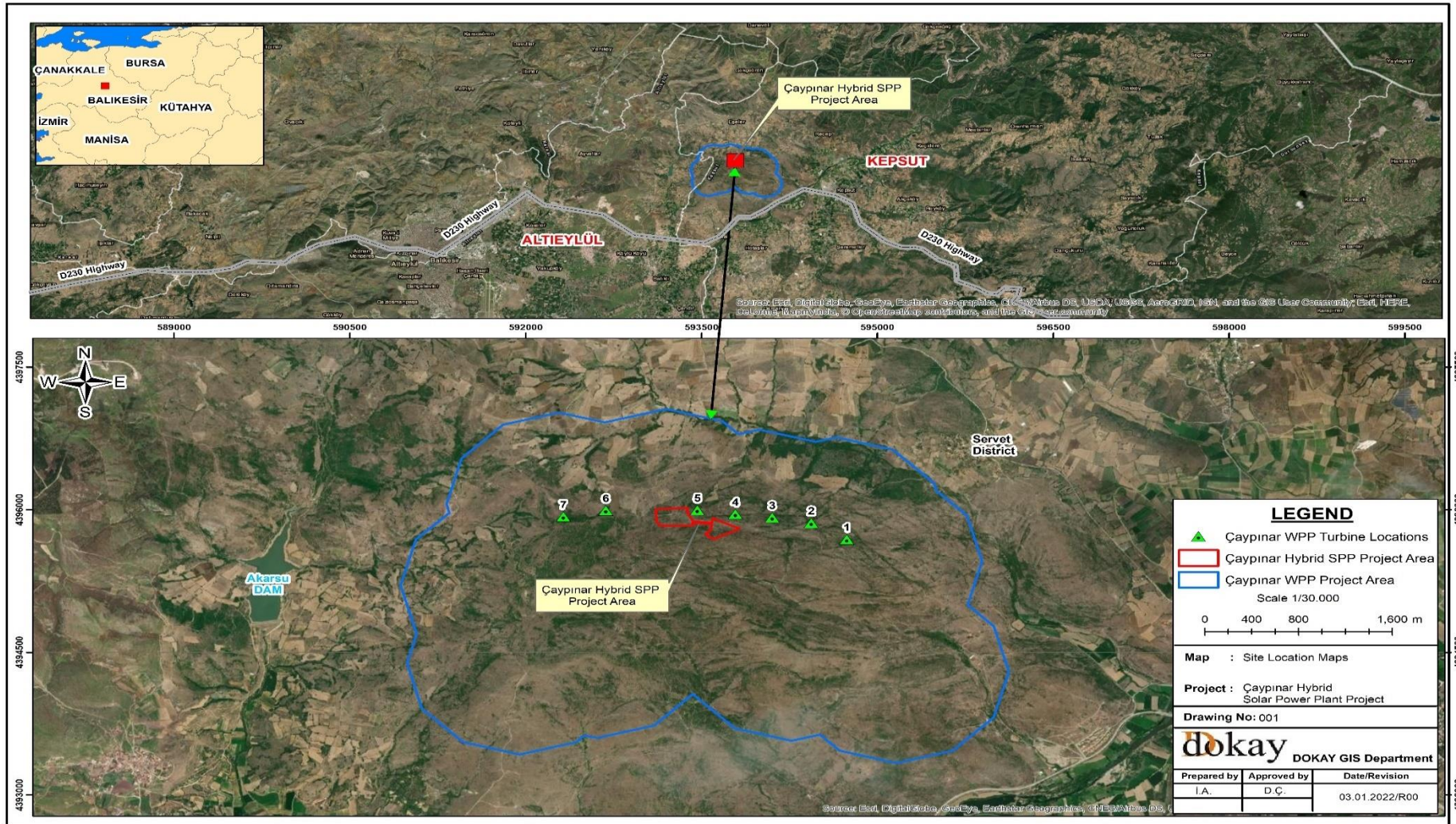


Figure 2-1: Site Location Map



Figure 2-2: Closest Neighborhoods

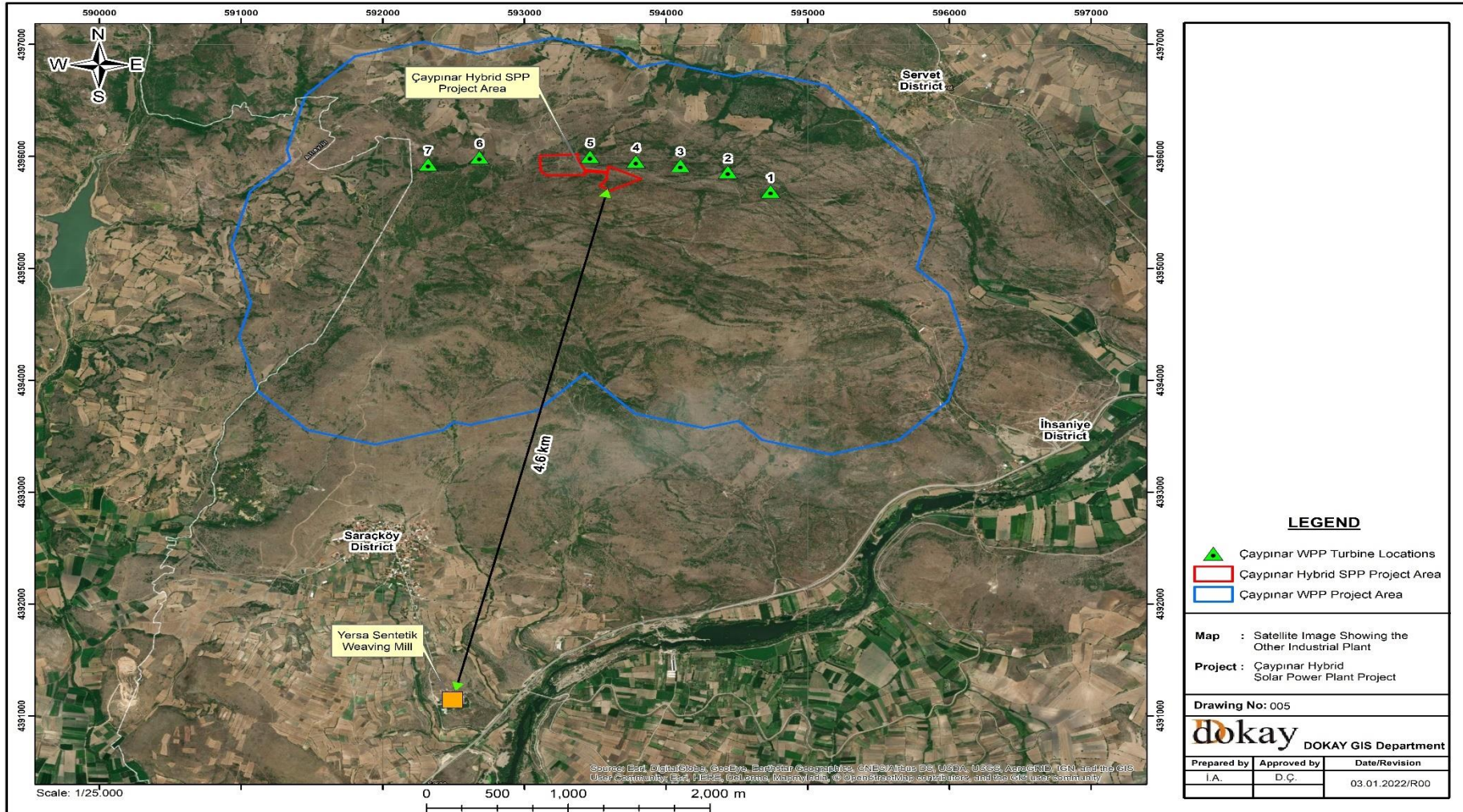


Figure 2-3: Other Industrial Plants in the Region

3 NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS

In the Stakeholder Engagement Plan of the Project, the Performance Standards (“PS”) established by International Finance Corporation (“IFC”) as well as the relevant national legislation will be taken into consideration. The information on such national and international legal regulations is given below.

3.1 National Legislation and Official Grievance Mechanism

3.1.1 Constitution of Republic of Turkey

Constitution of Republic of Turkey (Law No:2709; Date of Enactment: 07.11.1982) comprises regulations that must be taken as a basis concerning the Stakeholder Engagement components. The provisions of the Constitution related to Stakeholder Engagement subjects are listed below.

Freedom of Thought and Opinion (Article 25):

Everyone has freedom of thought and opinion. Nobody can be forced to declare his/her thoughts and opinions regardless of the reason and purpose; (s)he cannot be condemned and blamed due to his/her thoughts and opinions.

Freedom to Declare and Promulgate Thoughts (Article 26):

Everyone has the freedom to declare and promulgate his/her thoughts and opinions verbally, through writing, drawing or other ways individually or collectively. This freedom covers the freedom of obtainment or provision of information or opinions without the intervention of official authorities.

Health, Environment and Dwelling (Article 56):

Everyone has the right to live in a healthy and balanced environment. It is the duty of the State and the citizens to improve the environment, to protect environmental health and to prevent environmental pollution. The state centrally plans the health organizations and ensures that they provide service in order to ensure that everyone lives with physical and mental health and to ensure collaboration by increasing the saving and efficiency in human and material power. The State performs this duty by using and auditing the public and private health and social institutions.

3.1.2 Right to Information Act

The Right to Information Act (Law No: 4982), which was issued in the Official Journal dated 24.10.2003 and numbered 25269, regulates the principles and procedures on people’s right to information in compliance with the principles of equality, objectivity, and clarity, which are the requirements of democratic and transparent management. Under Chapter Two Article 4, everyone has the right to information.

3.1.3 Right to Petition Act

The Right to Petition Act (Law No: 3071) was enacted being issued in the Official Journal dated 10.11.1984 and numbered 18571. This act has the purposes of regulating the use of the right to make written applications to the Grand National Assembly of Turkey and the authorized bodies for the Turkish citizens and the foreigners residing in Turkey about their wishes and complaints related with them or with the public.

Under Article -3 of the Right to Petition Act, Turkish citizens have the right to apply to the Grand National Assembly of Turkey and the authorized bodies about their wishes and complaints related to them or the public in writing.

3.1.4 Environmental Impact Assessment Regulation

Environmental Impact Assessment Regulation (Official Journal dated 25.11.2014 and numbered 29186) provides the legal framework on the Stakeholder Engagement Meetings, which constitute an important part of the environmental impact assessment (“EIA”) process. Before the identification of the scope of the projects, which are subject to the EIA process, a Stakeholder Engagement Meeting is held as a legal obligation. In line with this, Article 9 of EIA Regulation includes the following provision: *“Public Engagement Meeting shall be held at a central location that is determined by the governorate and that is easily accessible for the local population, who are expected to be most impacted by the project, on a date and time determined by MEU, with the Engagement of the organizations, to which competence is issued by the Ministry of Environment and Urbanization (“MEU”), and of the project owner, to inform the public on the investment and to obtain their opinions and recommendations on the project.”*

During the review assessment meetings, the Commission investigates and assesses whether solutions are provided for the opinions and recommendations declared by the local population and society at the Stakeholder Engagement Meetings and during other stages of the process.

EIA Report, which is examined and finalized by the Commission, is publicized for a period of ten calendar days through hung announcements and internet by MEU and/or governorate to obtain the opinions and recommendations of public. In the project decision-making process, MEU takes into consideration the opinions obtained at this stage.

In this frame, if any insufficiency is detected in the report contents in line with the opinions obtained from the public, it may be requested to complete such insufficiencies, to perform additional works or to re-gather the commission. The “EIA positive” or “EIA Negative” decision given on the project is announced by MEU and the relevant Governorate through hard-copy announcements and official website.

3.1.5 Official Grievance Mechanisms

Under the Right to Petition Act and Right to Information Act, the stakeholders can notify their requests, recommendations, and complaints about the Project by making an application over the Presidency Communication Center (“CİMER”), which acts under the Communication

Department of Presidency. The stakeholders can make their applications on CİMER internet website (<https://www.cimer.gov.tr>) or by calling Alo 150 Direct Presidency line.

Similarly, complaints and/or suggestions regarding the activities within the scope of the Project can be made by filling out the contact forms on the web pages of Balıkesir Metropolitan Municipality and Kepsut Municipality. The contact information of the relevant institutions and municipalities is presented in Table 3-1.

Table 3-1. Contact Information of Official Institutions and Municipalities

Institution	Communication Channels
Ayen Ostim	Address: Hülya Sokak No: 37, 06700 G.O.P / ANKARA Phone: +90 312 445 05 02 Suggestion Form: https://www.ayen.com.tr/eng/iletisim.aspx
CİMER	Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe - Ankara Tel: 0 (312) 590 20 00 Website: https://www.cimer.gov.tr/ Phone: 150
Balıkesir Metropolitan Municipality	Adress: Eski Kuyumcular Mah. Mekik Sokak No:25 Balıkesir / TURKIYE Communication Center: 444 40 10 WhatsApp Report Line: 0552 266 1010 e-mail: belediye@balikesir.bel.tr Website: https://www.balikesir.bel.tr Link to Report Wishes and Grievances: https://e-belediye.balikesir.bel.tr/SikayetOneri/Index/
Kepsut Municipality	Adress: Cumhuriyet Meydanı No 19 Kepsut/ BALIKESİR Telephone: 0 266 576 1008 e-mail: kepsut@kepsut.bel.tr Website: http://kepsut.bel.tr Contact form link: http://kepsut.bel.tr/iletisim.asp

3.2 IFC Standards

IFC PS1 identifies the general framework related to the creation of Stakeholder Engagement Plan and Grievance Redress Mechanism. Under IFC PS1, the Engagement of stakeholders is a must to be able to establish the strong, constructive, and sensitive relationships that are necessary for the successful management of the environmental and social impacts of a project.

Stakeholder Engagement is a continuous process. Stakeholder Engagement consists of analysis and planning of stakeholders, informing the stakeholders, ensuring consultation and engagement, developing of Grievance Redress Mechanism, and maintaining the continuity of the informative reports to the stakeholders, although the priority of these stakeholders varies. The methods and frequencies of Stakeholder Engagement exhibit great differences, however, the works to be performed in this scope must be proportional with the current stage of the project (construction, operation, etc.), the possible risks, and adverse impacts that may be occurred.

The fundamental requirements related to the Stakeholder Engagement process under the international standards are as follows:

- Identification of stakeholders.
- Preparation of Stakeholder Engagement Plan.
- Sharing the necessary information with the populations, who are or can be impacted by the Project due to the activities in the construction and operation stages.
- Preparation and application of a grievance and feedback mechanism that addresses the concerns, complaints, demands, and recommendations of the stakeholders in relation to the Project.

Similarly, the “Stakeholder Engagement: Good Practice Manual for Companies Working in Developing Countries” that is prepared by IFC, defines the main components of the Stakeholder Engagement process as follows:

- Stakeholder analysis and planning their engagement,
- Information sharing; reporting to the stakeholders and consultations.
- Bargaining and partnerships.
- Engagement of stakeholders in the project follow-up.
- Grievance management.
- Other management functions.

4 ROLES AND RESPONSIBILITIES

Ayen Ostim will assume all responsibility, including the organization of the entire process within the scope of stakeholder engagement and grievance redress mechanism, ensuring communication with stakeholders, receiving requests and/or grievances from stakeholders, and responding to these requests and grievances. The duties and responsibilities determined for the effective implementation of the stakeholder engagement process and the grievance redress mechanism are presented in Table-4.1.

Table-4.1: Roles and Responsibilities within the scope of SEP Applications

Roles	Duties and Responsibilities
Project Manager	<ul style="list-style-type: none"> • Ensuring that sufficient resources are allocated to effectively implement the SEP and grievance redress mechanism during the construction and operation period of the Project. • Ensuring that grievances and/or suggestions from external and internal stakeholders are collected, recorded and responded to • Ensuring effective and regular communication with the stakeholders • Organizing Stakeholder Engagement Meetings • Sharing information regarding the Project • Conducting consultation activities
OHS Specialist and Environmental Engineer	<ul style="list-style-type: none"> • Providing information and/or reporting to the Project Manager about the practices of the SEP and the grievance redress mechanism. • Reviewing the grievance database regularly. • Reviewing grievances from stakeholders and responding to incoming grievances with reasonable timing. • Ensuring the application of SEP by subcontractors. • Ensuring that internal grievances are recorded and responded. • Providing trainings to Ayen Ostim employees and subcontractors on practices under the SEP and Grievance Redress Mechanism.

5 IDENTIFICATION OF STAKEHOLDERS

Individuals, groups, and institutions/organizations that are affected by the project activities and performance can affect these processes or have a legal relationship with the Project are considered as stakeholders.

Identifying stakeholders in the early stages of the Project is a key step in the stakeholder engagement process. The main purpose of identifying stakeholders is giving priority to the people, groups, and institutions by defining those people, groups and institutions that may be directly or indirectly affected by the Project and may be related to the Project. In this framework, individuals and groups that may be affected by the Project have a special importance due to their disadvantage and/or vulnerability.

Stakeholders determined within the scope of the Project are presented in Table-5.1. Among these stakeholders, stakeholders except the Company Group are evaluated as External Stakeholders. In addition, within the scope of the Project, Civil Society Organizations, Universities and Media are defined as indirect stakeholders; while, Local Communities, Government Institutions and Organizations, Local Government Organizations, Credit Institutions and Company Group are determined as primary stakeholders (direct stakeholders).

Table-5.1: Stakeholder Groups Determined within the Scope of the Project

Stakeholder Group	Stakeholders	Relation with the Project
Ecosystem	<ul style="list-style-type: none"> • Flora and fauna species in the Project Area and its immediate surroundings 	<ul style="list-style-type: none"> • Protection and monitoring of biodiversity elements in the Project Area and its immediate surroundings during the activities to be carried out during the construction and operation period of the Project.
Districts Near the Project Site and Local Communities	<ul style="list-style-type: none"> • Residents of Saraç Neighborhood • Residents of İhsaniye Neighborhood • Residents of Servet Neighborhood • Residents of Eşeler Neighborhood 	<ul style="list-style-type: none"> • Environmental and social factors such as noise, air pollution and public health and safety • Socio-economic impacts • Local employment
Government Institutions and Organizations	<ul style="list-style-type: none"> • Energy and Natural Resources Ministry • Energy Market Regulatory Authority • Turkish Electricity Transmission Corporation • Ministry of Environment, Urbanization and Climate Change • Ministry of Agriculture and Forestry • General Directorate of Nature Conservation and National Parks • Ministry of Family, Labor and Social Services • Ministry of Transportation and Infrastructure 	<ul style="list-style-type: none"> • Policy making • Permits and licenses that should be taken within the scope of the project • Protection of the health and safety of employees and their local communities • Protection of the environment • Protection of cultural heritage • Protection of biological diversity • Permits that should be taken regarding the land usage • Obtaining the necessary permissions on issues related to transportation • Operation and maintenance of the Infrastructure Services and Energy Transmission Lines

Stakeholder Group	Stakeholders	Relation with the Project
	<ul style="list-style-type: none"> Ministry of Health Ministry of Culture and Tourism Ministry of Treasury and Finance 	<ul style="list-style-type: none"> Prevention of the spread of infectious diseases and protection of public health
Local Government Organizations	<ul style="list-style-type: none"> Balıkesir Governorship Provincial Directorate of Environment and Urbanization Balıkesir Regional Directorate of Forestry 2nd Regional Directorate of Ministry of Agriculture and Forestry (Balıkesir Branch Office) Balıkesir Governorship Provincial Directorate of Agriculture and Forestry Balıkesir Cultural Heritage Conservation Regional Board Directorate Balıkesir Provincial Health Directorate Balıkesir Metropolitan Municipality Balıkesir Provincial Gendarmerie Command Kepsut Municipality Balıkesir Governorship Kepsut District Governorship Mukhtar Offices 	<ul style="list-style-type: none"> Getting the necessary permissions within the scope of the project Managing project environmental impacts (such as waste and wastewater) and environmental audits Permits that should be taken regarding the land usage Prevention of the spread of infectious diseases Protection of workers health and public health and safety Consultation on the procedures to be done for the protection of cultural assets in case of incidental finding Communication in case of an emergency Safety
University	Ankara University	Getting technical support for the preparation of Ornithology Report
Neighboring Facilities	Yersa Sentetik	Common labor source
Civil Society Organization (CSO)	<ul style="list-style-type: none"> Nature Association Turkish Environment Foundation 	Negotiations and technical support on environmental and social impacts, economic development and employment issues
Credit Institutions	International financial institutions and private banks (Development and Investment Bank of Turkey and international resources associated with Development and Investment Bank of Turkey)	Project Finance
Media	<ul style="list-style-type: none"> Local and national newspapers Social Media 	Information sharing and advertising studies about the Project
Company Group	<ul style="list-style-type: none"> Project employees Subcontractors 	<ul style="list-style-type: none"> Project Environmental and Social Management System applications Employment Workforce and management

6 INFORMATION TOOLS AND METHODS

Sharing information regarding the Project helps local communities and other stakeholders understand the opportunities as well as the risks and impacts associated with the project. In this way, stakeholders are ensured to have access to information such as (i) The purpose, feature, and scale of the Project; (ii) duration of the proposed project activities; (iii) risks and potential impacts to the communities in question and mitigation measures taken against them; (iv) the envisaged stakeholder engagement process; and (v) Grievance Redress Mechanism.

Ayen Ostim will use communication tools such as media, corporate web site, brochure and information notes, correspondences, announcements, regular meetings, face to face interviews and other informative activities in order to make consistent and transparent and timely informing to the local communities, company employees and other stakeholders. In this context, Ayen Ostim shares up-to-date information and documents related to the Project on its corporate website (see: <http://www.ayen.com.tr>).

Stakeholder Engagement Plan and Grievance Redress Mechanism Reports will be kept on the website and in the Mukhtars offices. In addition, the Ayen Ostim corporate website contains materials that provide information about the different stages of the Project, and stakeholders are constantly informed about the Project on the corporate website.

When stakeholders are exposed to risk and negative impacts due to the activities under the Project, a consultation process will be carried out to ensure that stakeholders express their views, and the Project Owner can respond by evaluating these views. The consultation process will be commensurate with the project risks, negative impacts and concerns raised by the stakeholders. The issues listed below will be considered for an effective consultation process:

- The consultation process will be initiated during the construction period of the Project where environmental and social risks and impacts are determined and will be repeated as risks and impacts occur.
- The information shared during the consultation process will be transparent, objective, meaningful and easily accessible in a simplified, appropriate format that local communities can understand.
- The consultation process will focus on groups directly affected by the Project rather than indirectly affected stakeholders.
- In order to manage the process well, it will be ensured that there is no external orientation, intervention and compelling.
- Outputs related to this process will be recorded.

In case of any grievances from stakeholders, Ayen Ostim will respond to the demands, comments, and questions of local communities implicitly and in time, in addition to the implementation of the Grievance Redress Mechanism. All requests will be treated by having respect. When it is not possible to fulfill a specific request, stakeholders will be given a detailed explanation of why this is not possible, with the help of social plans.

7 STAKEHOLDER ENGAGEMENT PROGRAM

The purpose of stakeholder engagement is to provide communication with stakeholders continuously, in order to inform them about the activities to be carried out during the construction and operation periods of the Project. The information to be shared with stakeholders, the communication methods, and tools to be used, stakeholder groups, and responsible persons are presented in the Stakeholder Engagement Program in Table 7-1. Stakeholder Engagement Program will be reviewed and revised based on project performance requirements and feedback from stakeholders on construction and operations.

The information that is presented to stakeholders within the Stakeholder Engagement Program outlined in Table 7-1 will be simple and clear in a way that everyone can understand. Stakeholders will be motivated for expressing their concerns freely at the meetings. Questions from stakeholders will be answered and the complaints/concerns, that are mentioned in the meetings, will be evaluated.

Consultations and meetings will be held at regular intervals, under the control of Ayen Ostim, in order to make the contractors and subcontractors involved in the stakeholder engagement processes, to inform employees about the progress related to the Project, to express the functioning of the internal and external grievance mechanism, and to receive the opinions of them. It should be ensured that other stakeholders who will be affected by the studies are also informed about the studies in detail, and they should be informed of the grievance redress mechanism that is established.

Before the construction period of the Project, DOKAY CED-Environmental Engineering officials held meetings with Ayen Ostim Administrators and personnel, and with the mukhtars, that are representing the local people, of the neighborhoods in the Project site, within the scope of "Stakeholder Meetings" on January 6-7. Details of these meetings are included in the section titled "Stakeholder Meetings" in this report.

Table 7-1: Stakeholder Engagement Program

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents as Performance Indicators	Communication Tools and Methods	Responsible
Districts Near the Project Site and Local Communities	<ul style="list-style-type: none"> • Construction • Operation 	<ul style="list-style-type: none"> • Semi-annually in construction period • Annually in operation period • In case of any grievances and/or suggestions from communities 	<ul style="list-style-type: none"> • Environmental and Social Action Plan • Environmental and Social Management Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms • Open job positions • Goods and service purchasing transactions • Project schedule and planning • Annual activity reports 	<ul style="list-style-type: none"> • Company web site • Informative notices and brochures • Correspondence and phone calls • Media • External Grievance Forms 	Project Manager
Government Institutions and Organizations / Local Government Organizations	<ul style="list-style-type: none"> • Construction • Operation 	<ul style="list-style-type: none"> • When permission is required from the governmental institutions/organizations within the scope of the Project • When it is necessary to apply to governmental institutions/organizations within the scope of the Project • In case of supervision by governmental institutions/organization • In case of grievances and/or suggestions from 	<ul style="list-style-type: none"> • Project schedule and planning • Annual activity reports • Documents required within the scope of permits to be obtained 	<ul style="list-style-type: none"> • Company web site • Correspondence and phone calls 	<ul style="list-style-type: none"> • Project Manager • OHS Specialist • Environmental Engineer

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents as Performance Indicators	Communication Tools and Methods	Responsible
		government institutions/organizations			
Universities	<ul style="list-style-type: none"> • Construction • Operation 	<ul style="list-style-type: none"> • When consultancy on technical issues is required within the scope of the Project 	<ul style="list-style-type: none"> • Technical information about the Project 	<ul style="list-style-type: none"> • Correspondence 	Project Manager
Civil Society Organization (CSO)	<ul style="list-style-type: none"> • Construction • Operation 	<ul style="list-style-type: none"> • If necessary • In case of grievances and/or suggestions from CSOs 	<ul style="list-style-type: none"> • Environmental and Social Action Plan • Environmental and Social Management Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms 	<ul style="list-style-type: none"> • Company web site • Informative notices and brochures • Correspondence and phone calls • External Grievance Forms 	Project Manager
Credit Institutions	<ul style="list-style-type: none"> • Pre-Construction Period • Construction • Operation 	<ul style="list-style-type: none"> • During the annual Monitoring Meetings with credit institutions during the construction and operation periods of the Project • In case of need to share information/documents about the Project 	<ul style="list-style-type: none"> • Environmental and Social Action Plan • Environmental and Social Management Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms • Environmental monitoring reports about the Project • Annual activity reports on the environmental and social performance of the Project 	<ul style="list-style-type: none"> • Company web site • Regular meetings • Correspondence and phone calls • External Grievance Forms 	<ul style="list-style-type: none"> • Project Manager • OHS Specialist • Environmental Engineer
Company Group	<ul style="list-style-type: none"> • Construction • Operation 	<ul style="list-style-type: none"> • Regular meetings which will be conducted monthly periods 	<ul style="list-style-type: none"> • Environmental and Social Action Plan 	<ul style="list-style-type: none"> • Regular meetings • Correspondence and phone calls 	<ul style="list-style-type: none"> • Project Manager • OHS Specialist

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents as Performance Indicators	Communication Tools and Methods	Responsible
		<ul style="list-style-type: none"> • In case of any grievance and/or suggestion from employee 	<ul style="list-style-type: none"> • Environmental and Social Management Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms (Internal Grievances) • Awareness raising studies and trainings • Training documents • OHS procedure and plans • Procedure and plans on the management of environmental impacts • Project scheduling • Annual activity reports 	<ul style="list-style-type: none"> • Workforce audits / revision studies • OHS meetings • Internal Grievance Forms • Grievance boxes and information notes in the Project Site 	<ul style="list-style-type: none"> • Environmental Engineer • Subcontractors

8 GRIEVANCE REDRESS MECHANISM

A Grievance Redress Mechanism has been established within the scope of the Project to learn about the concerns and grievances of employees and external stakeholders regarding the environmental and social performance of the Project and to help the stakeholders eliminate them. In this process, possible risks and possible negative impacts of the Project were taken into consideration.

The Grievance Redress Mechanism aims to promptly address the concerns that stakeholders may have, using a culturally appropriate, transparent, and clear process. The party expressing its concern or grievance will not face any cost or sanction.

The Grievance Redress Mechanism does not constitute an obstacle to resorting to legal or administrative remedies. Stakeholders and affected communities will be informed about the Grievance Redress Mechanism during the stakeholder engagement process.

In order to effectively implement the Grievance Redress Mechanism, the steps given below are necessary to be followed:

- Grievance Redress Mechanism has been prepared by taking into consideration the environmental and social risks and possible impacts of the Project.
- The process should be design in a way that it is easily understandable, accessible, confidential, and appropriate in cultural manners
- Employees and external stakeholders will be provided with information about where, to whom and how to deliver their grievances.
- A response time related to incoming grievances will be determined (for example 15 days) and this time will be adhered to.
- By giving feedback to local communities, employees and other stakeholders, the actions taken regarding their concerns and grievances and the results of these actions will be explained.
- Necessary records will be kept regarding all transactions and reported annually to TKYB.

Internal and external grievances will be collected, recorded, and evaluated as the way it is stated below:

- Upon the receipt of the grievances, the process will be initiated by the Project Manager, OHS Expert or Environmental Engineer, depending on the type of grievance.
- Incoming grievances will be recorded in the database and reported annually to TKYB.
- The grievance will be directed to the relevant department and a preliminary assessment will be made on the subject.
- Actions and measures necessary for the resolution of the grievance will be determined and implemented.
- If the grievance owner has indicated the name and contact information in the grievance forms, he/she will be informed within five workdays after the start of the process. Likewise,

if the grievance is resolved, the person making the grievance will be informed within maximum 15 workdays.

- After the grievances are resolved by reaching an agreement with the grievance owner, the grievance will be closed by the responsible person.
- If the grievances cannot be resolved within a specified time for a valid reason, the parties making the grievance will be explained and information about the time extension will be provided.

In connection with the subject of the grievance Ayen Ostim Project Manager, OHS Specialist and Environmental Engineer will be responsible. If necessary, the grievance can be dealt with by all responsible parties.

In order to notify Ayen Ostim of the project grievances formally, internal and external grievance forms were created in two different formats. These forms are presented in Annex-1.

Employees and external stakeholders should know who and how to contact in case of suggestions, requests and grievances. In this context, responsible parties should also have detailed information about the Grievance Redress Mechanism's operation and related procedures.

Internal grievances that will possibly come from employees will be received as the way summarized below:

- All Project employee and field workers (including subcontractors) will be informed about the Grievance Redress Mechanism.
- The operation of the Grievance Redress Mechanism and the stakeholder engagement process will be included in the OHS trainings that will be repeated periodically during the construction and operation periods of the Project.
- In order to receive internal grievances, grievance/suggestion boxes will be placed at places of the Project Site where employees can easily reach. In areas where there are grievance/suggestion boxes, no image should be recorded with the camera.

The following practices will be implemented to receive grievances and/or suggestions from local communities and other external stakeholders:

- Detailed information about the Grievance Redress Mechanism will be given in the stakeholder engagement meetings.
- Grievance/suggestion boxes will be placed in the Mukhtar's office and/or village cafes in the nearest settlements.
- With the external grievance form, applications through the website can be received.
- Information about the locations of the grievance/suggestion boxes and how to convey their grievances will be provided to stakeholders.

The Grievance Redress Mechanism flow chart is shown in Figure-8.1.

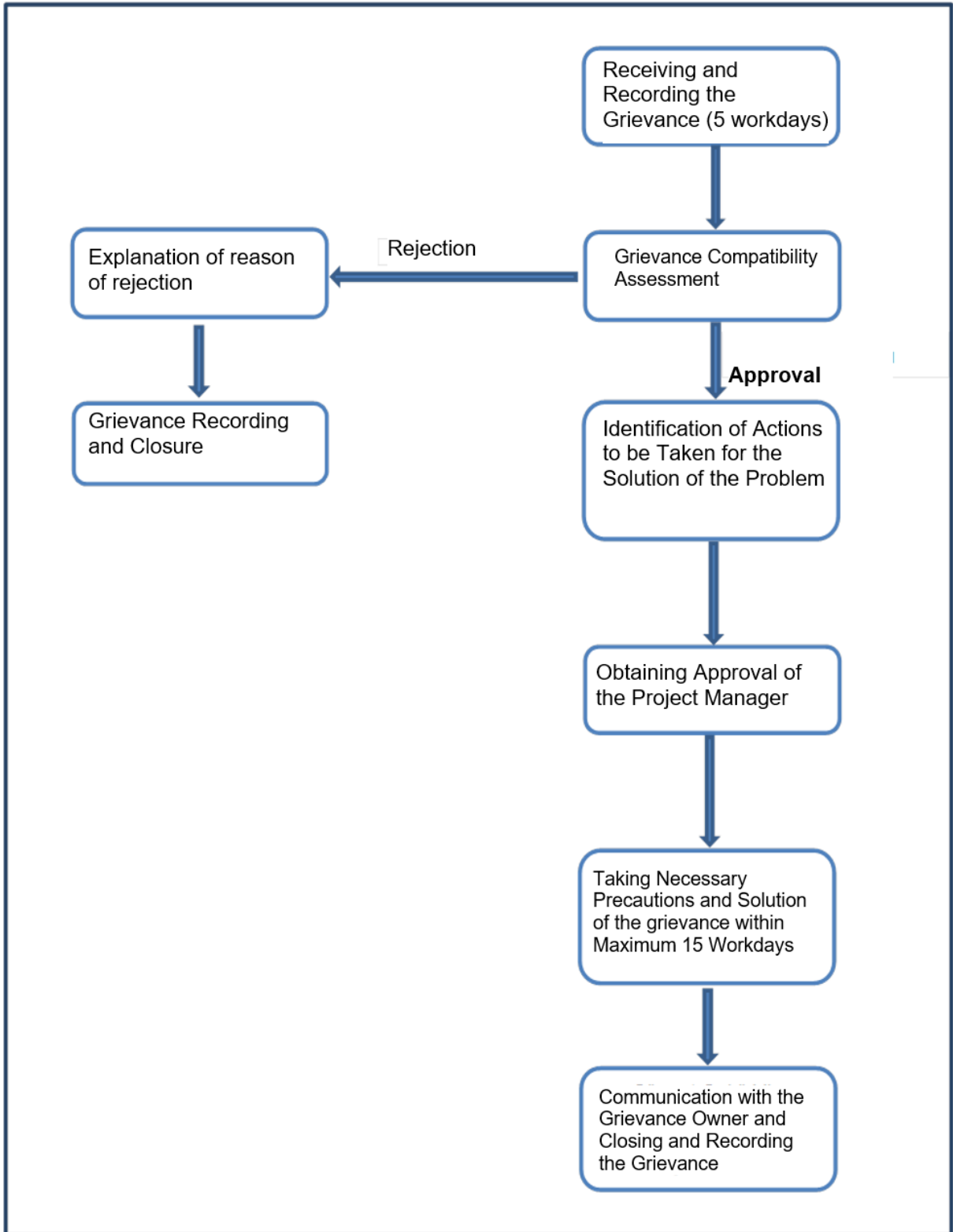


Figure 8-1: Grievance Redress Mechanism Flow Chart

9 MONITORING, AUDIT, REPORTING AND TRAINING

The stakeholder engagement process and the SEP will be regularly reviewed by Ayen Ostim during the Project construction and operation periods, and practices carried out in this context will be monitored. In addition, the feedback from stakeholders will be evaluated and stakeholders will be involved in the monitoring process.

If it's appropriate, stakeholder engagement activities will be addressed to stakeholders regarding the meetings held, the process and the effectiveness of the Grievance Redress Mechanism, as follows:

- Transparency of the accession process.
- Whether the information about the Project is provided or not.
- Whether grievances, questions and suggestions are answered in a timely manner.
- The clarity, applicability, and validity of the shared information.

In the process of monitoring the effectiveness of Stakeholder Engagement and Grievance Redress Mechanism, key performance indicators should be determined, and monitoring activities should be based on those indicators.

Performance indicators will be monitored through grievance registrations and reports. In this context, the performance indicators applicable for the Project are listed below:

- A decrease in the number of grievances coming from the local communities.
- Providing regular feedback to the stakeholders on the implementation of the Grievance Redress Mechanism.
- Number of resolved grievances.
- Conducting regular audits (twice a year during the construction period and once a year during the operation period) to ensure that the Grievance Redress Mechanism is implemented and that grievances are properly directed.

Compliance with the SEP will be periodically audited by Ayen Ostim Project management, TKYB and associated international institutions. Subcontractors will also be regularly audited by Ayen Ostim in line with Project Standards and SEP requirements. In this process, regular records will be kept on the issues listed below:

- Consultation meetings.
- Stakeholder engagement meetings.
- Suggestions and grievances received, and studies carried out in this context.
- Audit and monitoring reports

Information on the Grievance Redress Mechanism will be provided to Project employees and subcontractors within the scope of recruitment training. In addition, staff who are responsible for the stakeholder engagement process will also be provided with special training on the job and the subject.

10 STAKEHOLDER MEETINGS

On 6-7 January 2022, the Site Study and stakeholder meetings will be held by DOKAY Team. The Site Study Team members of DOKAY are introduced in Table 10-1.

Table 10-1: Site Study Team Members

Name	Title
Deniz Çağlar	Environmental Engineer and OHS Expert (Class-C)
Berat Batuhan Kaplangı	Environmental Engineer
Pelin Bekri	Sociologist

Stakeholder meetings were held in order to share information on the environmental and social management of the Project as well as stakeholder management and grievance redress mechanism. The list of the internal and external stakeholders that are interviewed during the meetings is given in Table 10-2.

Table 10-2: Interviewed Stakeholders During the Meetings

Name	Title
Emre Koç	Ayen Ostim Mechanical Engineer
Ercan Kara	Manager Representative
Gökhan Pala	Control Operator
Erdem Kaya	Officer
Mustafa Şen	Security Guard
Göksel Demirdağ	Mukhtar of Saraç Neighborhood
Dursun Çakmak	Mukhtar of Eşeler Neighborhood
Emin Eşsiz	Mukhtar of Servet Neighborhood

During the interviews, the personnel and the mukhtars were informed about the positive and negative impacts of the Project in environmental and social terms, their opinions/grievances were received and information on how to redress their grievances was shared with them. In addition, focus groups (local people) have been met in Saraç Neighborhood and information regarding the Project has been shared. In this context, information regarding the interviews is given in Table 10-3. The photographs taken during the interviews are included in Annex-2.

Table 10-3: Stakeholder and Focus Groups Meetings Details

Stakeholders and Focus Groups	Opinions on the Projects
Emre Koç Ayen Ostim Mechanical Engineer	During the Site Visit, a phone call has been conducted with the Emre Koç. Information related to the environmental issues of the Project especially regarding the Zero Waste Management System of the Project has been shared.
Ercan Kara Manager Representative	He stated that there are not any problems regarding the internal and external stakeholders of the Project. He said that some of the personnel stay in TOKİ Buildings which is near to the Project Area. He stated that he also lives in the mentioned place. Rental assistance is provided by Ayen Ostim. Transportation of the personnel to the Project area is maintained by the company car from TOKİ Building to the Project Area. He stated that there was a dog for security purposes within the Project area and it hurt an animal. Afterward, Project Management have found the owner of that animal and all the loss of that local person has been compensated. The security dog has been given to a shepherd in the Region. He said that shepherds graze their sheep in the Project area and the Project area is planned to be covered by fences (around the area of the solar panels whose layout can be found in ESMP of the Project as well as the area drawn by red in Figure 2-1 in this report).
Gökhan Pala Control Operator	He said they work in shifts and stated that he did not have any problems with working hours and meal allowances. He noted that he did not have any trouble communicating directly with the managers when he had any grievances. He was informed about the stakeholder engagement plan and grievance redress mechanism he could use when he has a grievance.
Erdem Kaya Officer	He mentioned that he lives in Eşeler. He stated that he is satisfied with the working conditions. He was informed with the stakeholder engagement plan and grievance redress mechanism.
Mustafa Şen Security Guard	He is an armed security guard of the Project Area. He mentioned that he had completed every training regarding security and occupational health and safety before recruitment. He mentioned that he lives in Eşeler. Depending on the weather conditions, he maintains his transportation directly from Eşeler or by company car from TOKİ.
Göksel Demirdağ Mukhtar of Saraç Mah. & Local People of Saraç	Local people of Saraç also have attended to the meeting (see Annex-2, Photo-5). He and the local people of the Saraç were informed regarding the Project during the meeting. Mukhtar mentioned that nobody in his neighborhood works in the Project Area since most of the people (c.70%) are working in the Yersa Sentetik (http://www.yersa.com.tr/en/contact-us/). He added that people of the neighborhood have no grievance regarding the Project. He emphasized that Ayen Ostim has constructed the walls graveyard and closets of the school of the neighborhood.
Dursun Çakmak Mukhtar of Eşeler	He stated that the local people of the neighborhood are satisfied with the Project. He emphasized that Ayen Ostim has provided the carpet to the Eşeler Mosque. The photo of the carpet can be found in Annex-2 Photo-7. He listed his expectations from the Project as follows; (i) Child Park construction in Eşeler, (ii) graveyard wall maintenance and construction (c. 1.5 m height, c.1 km long).
Emin Eşsiz Mukhtar of Servet	He stated that the existing Çaypınar Wind Power Plant authorities had visited their neighborhood during the construction period of that project and that they had wanted to employ security personnel from the neighborhood. However, he explained that the younger residents of the neighborhood prefer to go to the city center and that no one from their neighborhood works at the Çaypınar Wind Power Plant because the rest of them do not want to leave their current job, livestock farming. He emphasized that local people of his neighborhood are working in the animal husbandry sector. He said that shepherds graze their sheep in the Project area, and he suggested that the Project Area (around the solar panels) should be enclosed since animals can harm the system or animals got harmed by the system. He mentioned that there is a place in between the 2 nd and 3 rd wind turbines in the Project area and he suggested that the Project Owner may excavate that place for maintain a puddle since there is a region which has an area of 3-5 m ² that has a water existence potential when the soil 2-3 m drilled. He was informed regarding the stakeholder engagement plan and grievance redress mechanism.

11 CONCLUDING REMARKS

As a result of the Stakeholder Meetings completed by DOKAY, the opinions and suggestions of the local people about the Project were received. The importance of sharing their wishes and complaints in writing form was explained to them.

In order to increase the functionality of Stakeholder Engagement Plan, Plan should be shared with the relevant stakeholders by the Project Owner and contractors. Completing the training of Internal Stakeholders on stakeholder engagement and informing external stakeholders regularly about the engagement plan will increase the functionality of the Stakeholder Engagement Plan.

During the meetings with the stakeholders, it is observed that there are not any complaints of the local people regarding the Project. There are some demands of the local people from the Project Management. These demands can be listed as follows.

- Construction of a game park for children in Eşeler,
- Construction of the walls of the graveyard in Eşeler,
- Excavation of soil between the 2nd and 3rd existing wind turbine for obtaining puddle for animals.

Stakeholder engagement of the Project is one of the essential topics for the environmental and social management of the Project. By means of this Plan, stakeholder engagement strategies of the Project will be dynamic and meet the requirements of the stakeholders of the Project. The grievance redress mechanism will address all the complaints and suggestions of the stakeholders.

Stakeholder Engagement Plan and Grievance Redress Mechanism will be updated in accordance with the possible changes in the Project and demands and suggestions of the stakeholders.

ANNEXES

**ANNEX-1: INTERNAL AND EXTERNAL
GRIEVANCE / RECOMMENDATION
FORM**

EXTERNAL GRIEVANCE/ RECOMMENDATION /DEMAND FORM	
Information on the Owner of the Complaint/ Recommendation/ Demand (Please don't fill the blank if you don't want to share your personal information. The recommendations, complaints and demands without a name will also be taken into consideration.)	
Name and Surname:	
Date:	
Contact Information (<i>Please check the method of contact you prefer</i>):	
Telephone:	
E-mail:	
Address:	
Complaint/ Recommendation / Demand recorded by: Name and Surname	Complaint/ Recommendation / Demand recorded by: Name and Surname
Complaint/ Recommendation/ Demand Details	
Type of complaint/ recommendation/ demand:	
<input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Other	
Explanation on Complaint/ Recommendation/ Demand (What happened? When did it happen? Where did it happen? What is the result of the problem?):	
Frequency of the Event that is the subject of the form:	
<input type="checkbox"/> One-time event <input type="checkbox"/> The problem occurred for more than once <input type="checkbox"/> Problem is continuing (If "YES", please write the details)	
Record and Feedback (this part will be filled by AYEN)	
Complaint / Recommendation / Demand record No:	Complaint / Recommendation / Demand record No:
Person and Unit that received the Complaint/ Recommendation/ Demand:	
Action to be taken for the Complaint/ Recommendation/ Demand:	
This part will be filled by AYEN when the Complaint/ Recommendation/ Demand is Closed	
Action Closed By, Date and Signature:	

INTERNAL GRIEVANCE / RECOMMENDATION/ DEMAND FORM
Information on the personnel, who is the owner of the Complaint/ Recommendation/ Demand (please don't fill the blank if you do not want to share your personal information. Complaints, recommendations and demands without a name will also be taken into consideration.)
Name and Surname:
Date:
Contact Information: Telephone: E-mail: Address:
Details of Complaint/ Recommendation/ Demand
Explanation of Complaint/ Recommendation/ Demand: <input type="checkbox"/> Labor and Working Conditions: <input type="checkbox"/> Occupational Health and Safety: <input type="checkbox"/> Environment: <input type="checkbox"/> Other:
Frequency of the Event, which is the Subject of the Form: <input type="checkbox"/> One-time event <input type="checkbox"/> The problem occurred for more than once <input type="checkbox"/> The problem is continuing (If "YES", write the details)
What do you request to be done in relation with your Complaint/ Recommendation/ Demand?
Record and Feedback (this part will be filled by the responsible personnel of AYEN):
Complaint/ Recommendation/ Demand Record No:
Person and Unit that recorded the Complaint/ Recommendation/ Demand:
Action to be taken for the Complaint/ Recommendation/ Demand:
This part will be filled by the responsible personnel of AYEN when the Complaint/ Recommendation/ Demand is closed:
Action Closed By, Date and Signature:

ANNEX-2: PHOTOGRAPHS TAKEN DURING STAKEHOLDER MEETINGS



Photo-1: Interview with Ercan Kara

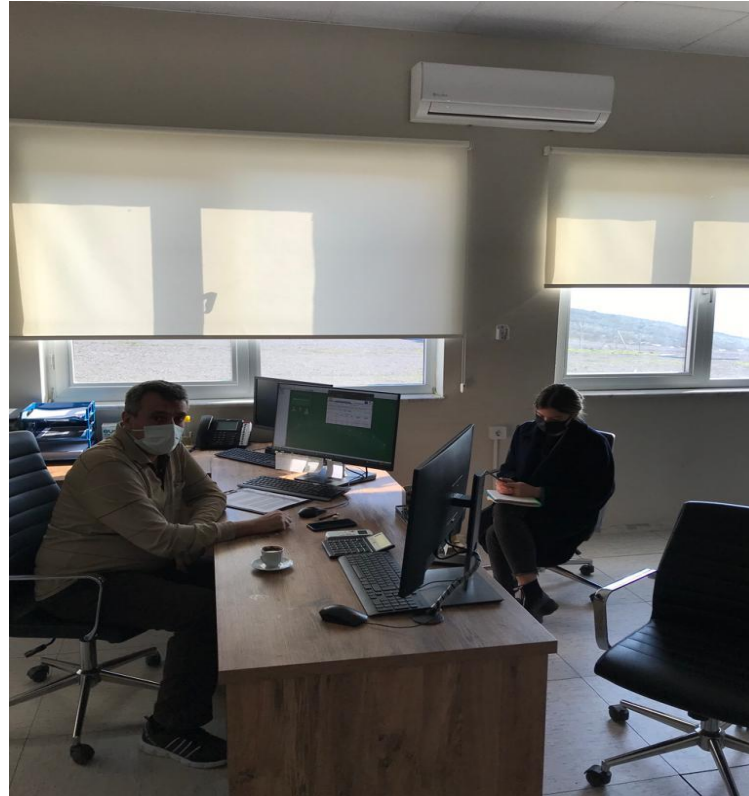


Photo-2: Interview with Gökhan Pala



Photo-3: Interview with Erdem Kaya



Photo-4: Interview with Mustafa Şen



Photo-5: Interview with Göksel Demirdağ and Local People of Saraç Neighborhood



Photo-6: Interview with Dursun Çakmak



Photo-7: Carpet Provided to the Eşeler Mosque



Photo-8: Interview with Emin Eşsiz