



Draft Report

Stakeholder Engagement Plan

Plan No: GLM-PLN-SOC-SEP-001

GÜLERMAK Heavy Industry Construction and Contracting Inc.

Operation Capital Investment Project



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Abbreviations

Aol	Area of Influence
CPR	Communication and Public Relations
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMPF	Environmental and Social Management Planning Framework
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
GMP	Internal and External Grievance Mechanism Procedure
GÜLERMAK	GÜLERMAK Heavy Industry Construction and Contracting Inc.
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
IMM	The Istanbul Metropolitan Municipality
KPI	Key Performance Indicator
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
OM/PM	Operation Manager / Project Manager
PAP	Project Affective People
Project Company	GÜLERMAK Heavy Industry Construction and Contracting Inc.
PR	Public Relation

PS	Performance Standard
PSO	Project Social Officer
QCRR	Question/Complaint/Request/Recommendation
QDMS	Quality Document Management System
SEP	Stakeholder Engagement Plan
TKYB	Türkiye Kalkınma ve Yatırım Bankası (Development and Investment Bank of Turkey)
The Project	GÜLERMAK Heavy Industry Construction and Contracting Inc. Operation Capital Investment Project

1. INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared within the scope of Operation Capital Investment Project with the reference number of GLM-PLN-SOC-SEP-001. This SEP is prepared as a general stakeholder engagement plan document for the investment projects of GÜLERMAK Heavy Industry Construction and Contracting Inc. (“Gülermak”) as per the national standards, International Finance Corporation (“IFC”) Performance Standards (“PSs”), World Bank (WB) Environmental and Social Standards (ESSs) and Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy. The reference number of this Plan is GLM-PLN--SOC-PLN-001.

During the preparation of this SEP, Ümraniye-Ataşehir-Göztepe Metro Project; one of the Gülermak’s projects, was selected as a pilot project and taken as a base to evaluate the Gülermak implementations. Accordingly, this SEP was prepared to reflect general issues which should be taken into consideration in the scope of the Gülermak’s investment projects.

Stakeholder Engagement Plan is prepared in parallel to the existing “Stakeholder Engagement Management Plan (UAG-PL-YS-003)” and “Customer Satisfaction and Complaint Management Procedure” documents being implemented in the Gülermak Head Office.

This is a dynamic document which is subject to revisions and updates in case of any need Gülermak.

1.1 Purpose and Scope

1.1.1 Purpose and Aim

The purpose of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders.

The purpose of this Plan is to outline a methodology for;

- ⇒ Identifying stakeholders and their interest to the Investment Projects,
- ⇒ Defining the scope of stakeholder engagement and setting out applicable management interfaces,
- ⇒ Defining roles and responsibilities,
- ⇒ Defining the applicable national and international standards relevant to this Plan,
- ⇒ Defining commitments and procedures relevant to this Plan,
- ⇒ Defining monitoring requirements of stakeholder engagement activities,
- ⇒ Defining training requirements,
- ⇒ Setting out references for supporting materials and information.

Moreover, this Plan aims:

- (i) to describe the most effective methods by (a) keeping the management of operation fully informed on the issues related to internal and external affairs and concerns; (b) establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns; and (c) understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns;
- (ii) to establish long term relations between Gülermak and local communities based on mutual trust and transparency,
- (iii) to ensure that stakeholders have access to information on the Projects, investments and operation activities in a timely manner and that disclosed information and date are fully understandable for the targeted groups and that access to consultation locations is available for all,
- (iv) to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and
- (v) to ensure that all relevant parties have been engaged and no group has been excluded.

1.1.2 Scope

This document is applicable to all investment projects of Gülermak, including associated facilities and to be implemented also by all Contractors and Subcontractors of Gülermak. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan, after getting approval from Gülermak.

Below is the list of the projects whose tenders have been received and whose contracts are currently in progress in Turkey of Gülermak which are covered by this Plan are listed below;

1. Ümraniye-Ataşehir-Göztepe (UAG) Metro Project – Construction - 3 Partners
2. Fahrettin Altay-Narlıdere Metro Project – Construction - 100% Gülermak
3. Kayseri Light Rail Transport Project – Construction - 2 partners
4. Halkalı-Ispartakule Railway Project - No activities yet - 3 partners
5. Sabiha Gökçen Metro Project - Almost finished - 2 partners

6. Sabiha Gökçen Metro Project – İzmir- No activities yet - 100% Gülermak.

1.2 Area of Influence

The Area of Influence (Aoi) should be determined in the scope of whole Gülermak investment Project, in compliance with applicable standards. This part comprises the UAG Metro Project, which was selected as a project in the scope of Aoi's for the Gülermak's investment projects will be determined based on the following factors:

- ⇒ Proximity of the settlements to the Investment/Operation sites and their components,
- ⇒ Landowners of the Investment/Operation sites,
- ⇒ Neighborhoods through which the access roads of the investment/operation project pass.

Aoi of UAG Metro Project:

The social impact area of the UAG Metro Project is defined as the route advancing and surrounding the Project area within the borders of Istanbul province, Ümraniye, Ataşehir and Göztepe districts. Station information and route order are given in the figure below.



Figure 1-1. Station information and route order

The roads to be used within the scope of the project are the access and entry roads to the station sites. Access to the station sites will be made through the main access roads and secondary roads of the province and district. No new access road will be built. The roads in question will also be carried out in line with the legal permission and route information to be obtained for construction excavation wastes. Coordination between stations will be carried out using the transport main access roads. Transports and shipments subject to special permission will be carried out in a planned manner with the permissions to be obtained from the competent authorities.

1.3 Definitions

Informed Consultation and Participation

On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.

Project Affected People (PAP)	Any person who, because of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Corporate Social Responsibility Projects	These are environmental and social sustainable development projects which are designed to mitigate possible effects of the power plants/projects operated by GÜLERMAK on the stakeholders; to contribute to the community development and to improve their living conditions.
Cultural Appropriate	A complaint or issues raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
Vulnerable People	People who by gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2 ROLES AND RESPONSIBILITIES

Key roles and responsibilities for the implementation of this Emergency Response Plan for UAG Metro Project are explained in this section of the plan.

Table 2-1. Key Roles and Responsibilities of UAG Metro Project

Roles	Description and Responsibilities
(Project) HSE Responsible(s)	<ul style="list-style-type: none"> Determining the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances Determining corrective/preventive measures if necessary
Contractors / Subcontractors	<ul style="list-style-type: none"> Contractors/Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence

Roles	Description and Responsibilities
and Employees	<ul style="list-style-type: none"> Abide by the rules enshrined in the Project Social Guidelines for the Site Personnel (given in Appendices of this Plan) Follow the rules listed in this SEP and other relevant Management System documentation of the Investment
Executive Committee	<ul style="list-style-type: none"> Providing the necessary resources to approve and implement the plan
Project Manager	<ul style="list-style-type: none"> To make the necessary delegation for the implementation of the plan, to follow up the works, to contribute to the implementation of the plan with Gülermak-Nurol Metro Construction Partnership personnel and other stakeholders Is responsible for conducting stakeholder analysis in the investment region, base-line studies of the project/investment Determination of SEP, project information package/kit and social budget for the project together with the Communication and Public Relation (CPR) Manager within the Management Team Implementation of GMP Forming the social agenda in the project/power plant team meetings Monitoring that CPR is managing the process in the prescribed manner Report to the Management Team about system performance Work in cooperation with other departments in order to determine targets for Environmental, Social and HS and resource efficiency issues
Employer Representative & IMM Public Relations Unit	<ul style="list-style-type: none"> Controls press relations to make press releases and to ensure transparent communication with local and national press and other media organizations by appropriate means such as meetings. Prepares the annual communication strategy. Is responsible for organizing meetings (if necessary, for the project) with social pre-research firms in project preparation phase Ensuring that the pre-research is performed in a correct and efficient manner Leading the team meetings in scope of stakeholder analysis Preparation and/or revision of SEP as well as project information kit Making and updating stakeholder management plans

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> Responsible for the budget controlling in the scope of social responsibility projects.
Project Assistant Managers & Group Management	<ul style="list-style-type: none"> Ensuring compliance with project standards and requirements specified in the work plan, managing teams accordingly, observing and supervising subcontractors, Responsible for the successful implementation and delivery of the business plan Ensuring work sites are in line with the business plan Developing, monitoring, revising the plan if necessary

In the scope of Gülermak general investment projects on the other hand, if project specific Environmental and Social Management System does not exist, the following Key Roles and Responsibilities table will be used.

Table 2-2. Key Roles and Responsibilities for Gülermak General Investments

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> Ensures this SEP will be implemented during the lifetime of the Project, Determines the policies and targets regarding the social communication and stakeholder engagement, Appoints the SRS Evaluates the reports provided by SRS and ensures necessary actions were taken, Provides necessary resources for proper implementation of this SEP and GMP.

Roles	Responsibilities
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> ➤ Records all formal and informal engagement activities with local communities in stakeholder management system, ➤ Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports, ➤ Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, ➤ Forms relationships with the Project stakeholders, ➤ Organizes stakeholder meetings to collect the responses to grievances actively as required, ➤ Provides regular reporting back to the community on the management related to community grievances, ➤ Determines and provides the necessary training materials for employees, ➤ Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.), ➤ Shows best efforts to resolve all complaints in one month, ➤ Searches the causes of the grievance and the social incidents that cause, injuries, delays or stoppage in the work and disputes among the Project and communities, ➤ Monitors all complaints and ensures that all complaints are resolved and closed, ➤ Follows the results of complaint and report on a monthly, and annual basis, ➤ Records and reports general and local employment rates and complaints, which are received or observed verbally, ➤ Filling out the “Complaint Register Form & Consultation Form”s ➤ Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed), ➤ Implements the SEP and GMP.
Health & Safety and Environment Responsible	<ul style="list-style-type: none"> ➤ Determines the national and international legislations that are applicable to the Project activities and informs the Top Management, ➤ Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, ➤ Provides answers to the OHS related grievances raised by employees, the local community, and local institutions ➤ Supports SRS on the first evaluation of the environmental related grievances collected, ➤ Determines corrective measures, if necessary, ➤ Checks the Environmental records and performance reviews of Contractors.

Roles	Responsibilities
Contractors / Subcontractors	<ul style="list-style-type: none"> ➤ Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence, ➤ Follows the rules listed in this SEP and other relevant management system documentation of the Project. ➤ Complying with the requirements and standards of the grievance mechanism procedure.

3 NATIONAL AND INTERNATIONAL STANDARDS

3.1 Applicable National Standards

3.1.1 The Constitution of the Republic of Turkey

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

X. Legal Equalitarianism

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

II. Prohibition of Forced Labour

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

VII. Freedom of Thought and Opinion

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

VIII. Freedom of Expression and Dissemination of Thought

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

VII. Right of Petition

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

3.1.2 Law on the Right of Information

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

3.1.3 Law on the Use of Right Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to this article of the Law on the Use of Right to Petition No. 3071 which was issued on 01.11.1984 with the Official Gazette number of 18571.

3.1.4 Labor Law

The Principle of Equal Treatment

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

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

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

Overtime Work

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

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

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

Working Age and Prohibition of Child Employment

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

3.1.5 Unions and Collective Agreements Law

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

3.1.6 Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 17 July 2008, no 26939) is defined which includes a limited public disclosure process.

3.2 Applicable International Standards and Guidelines

3.2.1 IFC Performance Standards

The international standards and guidelines which GÜLERMAK Heavy Industry Construction and Contracting Inc will follow for its investments are set by International Finance Corporation (IFC). IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (GN1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions*

Key objectives of *PS1* related to external grievance management are:

- To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,

- To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks and impacts to workers, Affected Communities, and the environment.
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

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

Key objectives of *PS2* related to worker grievance management are:

- To create equal, fair and nondiscriminatory working opportunities for every worker,
- To develop, maintain, and improve the worker-management relationship,
- To promote compliance with national employment and obey the labor laws,
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain by developing a reliable grievance mechanism,
- To identify, evaluate and respond to workers concerns and grievances in a timely manner,
- To promote safe and healthy working conditions to direct and indirect workers,
- To avoid the use of forced and child labor.

3.2.2 Development and Investment Bank of Turkey Environmental and Social Standards

Mission of the Development and Investment Bank of Turkey (Bank); to meet the financing and consultancy needs of investors, to assist structural transformation in line with Turkey's sustainable development priorities, to contribute to the spread of capital, and to cooperate with domestic and foreign institutions. In line with this mission, the Bank regards environmental and social sustainability as a fundamental component of sustainable and inclusive development. The Bank is aware of the need to address the three dimensions of sustainable development – economic, social and environmental – in a balanced and integrated manner. With this Environmental and Social Policy, the Bank aims to manage its direct and indirect environmental and social impacts that may arise as a result of its operational activities and financial services. This Policy covers all employees and activities of the Bank.

The Bank is aware of the importance of environmental and social development and the long-term benefits it will provide. In addition to combating climate change, the Bank adopts resource optimization, increases its positive environmental and social activities, and minimizes negative environmental and social impacts in order to manage the impacts arising from its activities. The Bank is determined to fulfill its legal obligations, to support environmental and social awareness, to focus on sustainability, to continuously improve its performance and to transfer its knowledge to its stakeholders.

With this perspective, the Bank aims to manage its direct impacts in an environmentally and socially sensitive manner. Greenhouse gas emissions resulting from the Bank's operational activities are regularly monitored and reduction targets are set. The Bank undertakes to take necessary measures to reduce resource consumption (energy, water, paper) and waste generation.

The Bank regards human resources as a core value, and aims to provide work-life balance, a safe and healthy working environment, and equal opportunities in choosing its customers and suppliers while recruiting and managing its employees.

In the investments it finances, the Bank undertakes to protect biological diversity and cultural heritage, to avoid discrimination and adversely affect the living conditions of communities, vulnerable groups or individuals, and to promote equal opportunities. The Bank does not support or finance investments that may have unacceptable effects on the environment and society. The Bank does not finance activities that are prohibited in accordance with the national legislation or international agreements to which Turkey is a party and that are included in the Unfinanced Activities List attached to this Policy or that do not comply with the environmental

and social conditions of the organizations to which it provides resources. The Bank finances investments that comply with applicable national regulations and relevant international standards, or provide a plan to achieve compliance within a reasonable period of time.

The Bank believes that environmental and social risk assessment should be a part of routine decision-making processes in all investment and loan applications. Therefore, the Environmental and Social Management System (ESMS) has been developed. It aims to protect the investment from risks related to credit, reputation, environmental and social obligations by applying this system throughout the loan life. The Bank evaluates all lending activities in accordance with national, environmental and social laws and regulations, the Bank's own policies and procedures, and other environmental and social standards that the Bank undertakes to comply with when necessary. Through the ESMS, the Bank consistently classifies the potential environmental and social risks of its client and lending activity and assesses the relevant environmental and social impacts. Action plans are developed by the Bank in order to reduce risks and impacts according to the defined environmental and social risk category, and performance is monitored throughout the loan period. The Bank may conduct site visits, when necessary, to ensure that environmental and social risks and impacts are effectively understood and a site-specific management plan is prepared when performing a credit assessment. Clients are supported to build capacity and effectively improve their environmental and social performance. The Bank also requests regular reporting and monitoring on environmental and social issues for all investments it finances.

The Bank is committed to providing the necessary capacity and organization for the effective implementation and maintenance of the ESMS throughout the organization, engaging with guides and third parties, and not materially altering the scope or impact of the ESMS. The Bank undertakes to carry out E&S due diligence in joint financing, joint venture and fund management partnership activities and to ensure that the scope of ESMS is not violated in such partnerships.

Training needs related to the ESMS are identified and employees are provided with the necessary training to increase their capacity.

Volunteer activities are supported with the public, non-governmental organizations and other stakeholders to raise public awareness on climate change.

The performance of the Bank's direct and indirect environmental and social activities is reviewed annually for continuous improvement. When deemed commercially and legally appropriate, activities financed in accordance with the ESMS are regularly shared with all stakeholders on the Bank's website according to risk categories. Any party directly and/or

significantly affected by the Bank's operations and financing activities can file a complaint with the Bank on the website (<http://kalkinma.com.tr/>) or via the e-mail address of surdurabilirlik@kalkinma.com.tr. Complaints received are systematically recorded, responded to in a timely manner and periodically reported to senior management. The Bank may also require its customers to share relevant E&S information with the public and to establish a grievance mechanism regarding the activities it finances.

The Sustainability Committee is responsible for monitoring and updating this Policy and the Board of Directors is responsible for its approval and repeal. The policy is updated as soon as necessary in case of changes in the legislation, occurrence of violations or the need for improvement. All updates to this Policy are made publicly available through the Bank's website.

List of Unfinanced Activities

The Bank undertakes that it will not directly finance the following projects/activities to its knowledge:

1. Forced or harmful or exploitative child labor
2. Production and/or trade of any product or activity deemed illegal under Turkish law or international conventions, such as:
 - a) Production or trade of products containing PCB3 (Polychlorinated biphenyl)
 - b) Production and trade of internationally prohibited drugs, pesticides (pesticides) / herbicides (herbicides) and other harmful substances (Rotterdam Convention, Stockholm Convention)
 - c) Production and trade of internationally prohibited ozone depleting substances, (Montreal Protocol)
3. Wildlife trade, trade or production of wildlife products regulated under CITES (Convention on International Trade in Endangered Species of Wild Plants and Animals)
4. Cross-border movements of wastes prohibited by Turkish or international laws, (Basel Convention)
5. Production or trade of firearms and ammunition
6. Production or trade of alcoholic beverages (excluding beer and wine)
7. Production or trade of tobacco products
8. Gambling, casino and equivalent enterprises
9. Trade or manufacture of unbounded asbestos fiber

10. Activities prohibited by the legislation of the country where the project is located or by international conventions on the protection of biodiversity or cultural resources such as the Bonn Convention, the Ramsar Convention, the Convention for the Conservation of the World Cultural and Natural Heritage and the Convention on Biological Diversity

11. Commercial logging or purchase of equipment for use in primary tropical rainforests or old-growth forests

12. Activities involving the production or trade of wood or other forest products from non-sustainably managed forests

13. Marine or coastal fishing practices that harm many sensitive or protected species or that pose a threat to marine biodiversity and habitats

14. Transport by tankers of oil or other dangerous goods that do not comply with IMO requirements (IMO, MARPOL, SOLAS and Paris MOU)

3.2.3 World Bank (WB) Environmental and Social Standards

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity.

This Framework comprises:

- ⇒ A Vision for Sustainable Development, which sets out the Bank's aspirations regarding environmental and social sustainability;
- ⇒ The World Bank Environmental and Social Policy for Investment Project Financing, which sets out the mandatory requirements that apply to the
- ⇒ Bank; and
- ⇒ The Environmental and Social Standards, together with their Annexes, which set out the mandatory requirements that apply to the Borrower and projects.

The World Bank Environmental and Social Policy for Investment Project Financing sets out the requirements that the Bank must follow regarding projects it supports through Investment Project Financing.

The Environmental and Social Standards set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrowers in their goal to reduce poverty and

increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will: (a) support Borrowers in achieving good international practice relating to environmental and social sustainability; (b) assist Borrowers in fulfilling their national and international environmental and social obligations; (c) enhance nondiscrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

The ten Environmental and Social Standards establish the standards that the Borrower and the project will meet through the project life cycle, as follows:

- ⇒ Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ⇒ Environmental and Social Standard 2: Labor and Working Conditions;
- ⇒ Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management;
- ⇒ Environmental and Social Standard 4: Community Health and Safety;
- ⇒ Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ⇒ Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ⇒ Environmental and Social Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ⇒ Environmental and Social Standard 8: Cultural Heritage;
- ⇒ Environmental and Social Standard 9: Financial Intermediaries; and
- ⇒ Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure

Environmental and Social Standard ESS1 applies to all projects for which Bank Investment Project Financing is sought. ESS1 establishes the importance of: (a) the Borrower exists environmental and social framework in addressing the risks and impacts of the project; (b) an integrated environmental and social assessment to identify the risks and impacts of a project; (c) effective community engagement through disclosure of project-related information, consultation and effective feedback; and (d) management of environmental and social risks and impacts by the Borrower throughout the project life cycle. The Bank requires that all environmental and social risks and impacts of the project be addressed as part of the environmental and social assessment conducted in accordance with ESS1. ESS2–10 set out the obligations of the Borrower in identifying and addressing environmental and social risks and impacts that may require particular attention. These Standards establish objectives and

requirements to avoid, minimize, reduce and mitigate risks and impacts, and where significant residual impacts remain, to compensate for or offset such impacts.

The Bank will issue a Bank Directive Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups, which will set out mandatory requirements on Bank staff relating to the identification of disadvantaged or vulnerable individuals or groups, and the process whereby differentiated measures will be developed to address the particular circumstances of such individuals or groups.

The Bank will also issue an Environmental and Social Procedure, which will set out Management, approved mandatory environmental and social procedures which apply to projects supported by Investment Project Financing. The Environmental and Social Procedure will describe how the Bank conducts its due diligence of a project being proposed for Bank support.

The Framework will also be accompanied by no mandatory guidance and information tools to assist Borrowers in implementing the Standards, Bank staff in conducting due diligence and implementation support, and stakeholders in enhancing transparency and sharing good practice.

The World Bank Access to Information Policy, which reflects the Bank's commitment to transparency, accountability and good governance, applies to the entire Framework and includes the disclosure obligations that relate to the Bank's Investment Project Financing.

Borrowers and projects are also required to apply the relevant requirements of the World Bank Group Environmental, Health and Safety Guidelines (EHSs).

These are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP).

3.2.4 Applicable Gülermak standards, policies and procedures

Key requirements implemented Gülermak for its investment projects according to PS2 are as following:

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

- Gülermak will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits
- Gülermak will make all policies understandable to all workers.

- Gülermak will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

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

Non-Discrimination and Equal Opportunity

- Gülermak will hire, promote and compensate workers solely based on their ability to do the job and all workers are Gülermak will ensure that all workers will be free from harassment by management or other workers.

Retrenchment

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

Child Labor

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

Forced Labor

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

- Gülermak will respect the rights of workers to leave the workplace after work.

Grievance Mechanism

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

Occupational Health and Safety

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

Workers Engaged by Third Parties

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

Supply Chain

- Gülermak will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- Gülermak will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.

Gülermak will monitor the performance of suppliers according to PS2 requirements concerning child labor and forced labor and significant safety issues.

3.3 Project Standards

Gülermak will comply with the above-mentioned national and international standards for all its investments during their operation phases. In case that the standards conflict with each other, Gülermak. will apply the most stringent standards for its operation facilities.

4 STAKEHOLDER IDENTIFICATION

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Gülermak Investment Projects shall be identified during the early engagement of the Projects.

For each project and/or investment developed by Gülermak a stakeholder identification is required to be done. Stakeholder identification is made by the following social dynamics:

- Socio-economic studies
- Socio-economic anonymous surveys
- Stakeholder analyses

Socio-economic studies are performed by skimming of existing social studies and searching the related news in the media (if any) that reflect the attitude of people in the region concerning the power plant investments. Also, those studies are conducted to understand the socio-economic features of the region such as the livelihoods, culture, employment ratios, demographic and infrastructural characteristics.

Socio-economic anonymous surveys are conducted by third party consultants anonymously to determine the social perception of the local people towards energy projects/investments that can have influence on the environment. These surveys are being held on need basis.

In the scope of the UAG Metro Project, the criteria for selection of the consultant companies are described in the “Stakeholder Engagement Management Plan (UAG-PL-YS-003)” of UAG Metro Project.

The surveys should cover the following questions to understand the socio-economic structure of the regions of UAG Metro Project:

- The level of media and internet usage should be taken into account.
- Environmental and cultural values/attitudes should be taken into account.
- Mosque, playground, highway, etc. (which can be realized or contributed as a corporate social responsibility project) of the region. The perception of renewable energy sources for all kinds of investment/project needs should be taken into consideration.

- Active Non-Governmental Organizations in the region should be contacted and their attitudes should be followed.
- The income sources of the region (tourism, animal husbandry, agriculture, etc.) should be investigated and taken into consideration.
- Influencers of the region, namely headmen, should be contacted.
- Age, gender, education level, employment status, etc. Demographic information should be researched and taken into account.

The area's water supply, sewerage system, roads, electricity, telephone line, etc. infrastructure features should be investigated and taken into account.

Stakeholder analysis is performed including the stakeholder groups such as national and local government bodies' female groups, household heads, mukhtars, local governments, NGOs, etc. List of stakeholder groups are evaluated according to their interest and attitude to the project/investment.

In addition, a baseline study including written or virtual records of the structures, places, lands, walls etc. is conducted. These baseline studies of the projects/investments should be kept in Document Control System of Gülermak.

After performing the above-mentioned studies, stakeholder identification is completed. Also, it has been screened and involved a wide array of potential stakeholders, including institutions, associations, NGOs and other informal groups that should be involved in the engagement process. The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context. The relevant stakeholder groups can be:

- ⇒ *Local Communities*: Mukhtars and residents of the close settlements within the Aol of the Investment/Project
- ⇒ *Governmental Authorities*: Provincial Directorates of Environment and Urbanization, Culture and Tourism and Agriculture and Forestry, Governorship District Governors, etc.
- ⇒ *Municipalities*: Metropolitan Municipalities or Provincial Municipalities and District Municipalities (within the Aol)
- ⇒ *Local Media*
- ⇒ *NGOs*: non-governmental organizations, especially in terms of environmental protection, agricultural development, women development, etc.
- ⇒ *Private Sector*: close private sector (necessarily the sectors/facilities that have a cumulative impact together with the Investment)

⇒ *Internal stakeholders*: employees including the contractors and subcontractors

5 STAKEHOLDER ENGAGEMENT

5.1 Stakeholder Engagement Planning

Stakeholder engagement activities for the energy Gülermak investment projects. will be performed in line with the national EIA legislation and international standards (Turkish Development and Investment Bank Environmental and Social Policy and World Bank Environmental and Social Standards).

During the project phases of the investments, Stakeholder Engagement Plan and project information package will prepared, and social budget will be determined for each project.

Project-specific Stakeholder Engagement Plans and Project Information Package are prepared by following the procedure given in the "Stakeholder Engagement Plan" of UAG Metro Project.

5.2 Public Participation Meetings

In the scope of Gülermak Investment projects, the following procedure is followed:

Following the necessary announcements in national and local newspapers, in mukhtars' offices or on the website, Public Hearing Meetings and/or Public Participation Meetings are conducted in the relevant settlements (Aol) at least one week or ten days before the meetings.

In the meetings, stakeholders are informed on the relevant investments, grievance mechanisms and communication methods with Gülermak in case the residents or stakeholders have questions/complaints/requests/recommendations (QCRRs). Also, the concerns of the participants are answered during those meetings. Minutes of meetings and participant lists are recorded, and copies are kept in the Document Control System dedicated for Stakeholder Engagement activities.

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The methods of communication to be utilized by Gülermak are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan, Grievance Mechanism Procedure, and Non-Technical Summaries of the Investments/Projects,
- Meetings with regulatory bodies

- Public meetings if required,
- Published on local municipalities' website (if available) and/or on Gülermak. website
- Announcements in local media
- Provision of general information on noticeboards at key public locations.

The following table summarizes the stakeholder engagement program in terms of:

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

In this respect, the following the stakeholder engagement program has been developed for UAG Metro Project.

Table 5-1. External and internal stakeholder engagement in the construction phase of UAG Project

Target Group	Engagement Topics	Purpose of Engagement	Method of engagement	Frequency	Responsible
<p>Project Affected Persons, Land and Property Owners/Owners/Users</p> <p>People living on the route</p> <p>Craftsmen, commercial, business owners</p> <p>Vulnerable and disadvantaged groups, immigrants</p>	<ul style="list-style-type: none"> Grievance mechanism Procedures for environmental and social impact management Expropriation Employment Supply 	<p>Debriefing</p> <p>To be influenced</p> <p>Submit</p> <p>Complaints and requests</p>	<p>Complaint records suggestion boxes</p> <p>Notifications by phone and e-mail</p> <p>Face to face meetings</p> <p>Meetings</p>	<p>Continually</p> <p>With meeting when necessary</p>	<p>Project Responsible</p> <p>IBB White Table 153</p>
<p>Non-Governmental Organizations</p>	<p>Social progress, economic and social development, environmental protection</p>	<p>Debriefing</p> <p>Submitting complaints and requests</p> <p>Community projects</p>	<p>Meetings</p>	<p>When requested / as needed</p>	<p>IMM officials</p> <p>Project Responsible</p>

Target Group	Engagement Topics	Purpose of Engagement	Method of engagement	Frequency	Responsible
		Employment			
Municipalities mukhtars Project Worker	Management of environmental and social risks of the project	Debriefing Submitting complaints and requests Expropriation Community projects Employment	Meetings Brochures	When requested / as needed	IMM officials Project Responsible
Public Authorities	Legal compliance and regulatory requirements	Audit Getting information legal liability	Meetings	When requested / as needed	IMM officials Project Responsible
Media	Project activities Environmental and social impacts of the project Community projects	Getting information Informing the public	press conferences Information on request	When required / as requested	IMM officials
Partnership employees	Procedures regarding employee rights, welfare and needs Management mechanisms	Employee grievance mechanism	Interviews Complaint boxes Sharing via e-mail	Continually with relevant meetings	

Target Group	Engagement Topics	Purpose of Engagement	Method of engagement	Frequency	Responsible
	resources	worker rights Occupational health and safety procedures	occupational health and safety committee Company social events for employees		Project Responsible
Subcontractor employees	Procedures related to employee rights, resilience and needs Management mechanisms resources	Subcontractor management plan Employee grievance mechanism worker rights Occupational health and safety procedures	Interviews Complaint boxes Sharing via e-mail occupational health and safety committee Company social events for employees	Continually with relevant meetings	Project Responsible

6 TOOLS & METHODS FOR INFORMATION DISCLOSURE

In this section, tools & methods used for information disclosure developed for UAG Metro Project is given. The same statements will be followed in the scope of the Gülermak's investment Projects if projects do not have a project specific ESMS.

Gülermak-Nurol Metro Construction Partnership will assist relevant institutions for the distribution and notification of clear, consistent and timely information materials to be made by the IMM Anatolian Side Rail Systems Directorate Coordinator and IMM Public Relations Unit for all stakeholders. Prior to any disclosure, pre-disclosure planning will be undertaken to define an information sharing process to ensure that all key groups within the communities concerned are given the opportunity to obtain and comment on project information.

The tools and methods that this material will be disclosed, is discussed in the sections that follow.

6.1 Website

Gülermak-Nurol Metro Construction Partnership will keep the updated information on the project in Turkish and English on its website. This information will be carried out on the website prepared by the Gülermak-Nurol Metro Construction Partnership and made available to the IMM Anatolian Side Rail Systems Directorate. Information update will be prepared by Gülermak-Nurol Metro Construction Partnership and/or IMM Anatolian Side Rail Systems Directorate and included in the system.

- ⇒ <https://www.uagmetro.com>
- ⇒ <https://www.gulermak.com.tr/>

6.2 Information Sheets

Information forms on important project topics and minimization, mitigation and management approaches will be updated and presented on the website by Gülermak-Nurol Metro Construction Partnership and/or IMM Anatolian Side Rail Systems Directorate. If necessary, it will be made available in mukhtars and official institutions within the project area of influence.

6.3 Responding to Local Communities and Publications for the Communities

In addition to the Complaint Procedure that Gülermak-Nurol Metro Production Partnership will implement for certain problems and expectations, as stated in the Company Management Plan, Gülermak-Nurol Metro Construction Partnership will respond completely and in a timely manner to the expectations, comments and questions of the local people. All expectations will be met with respect through the complaint-receiving and answering mechanism under the

coordination of the IMM Anatolian Side Rail Systems Directorate, IMM Public Relations Unit 153 White Desk Complaint Line. The reasons for those who could not be fulfilled will be informed and persuaded through the IMM Public Relations Unit by referring to the social management plan with data and justifications.

Details on the different phases of the project, booklets, CDs, films, brochures, posters and similar materials (if needed) will be available at the central project office as well as on the company website.

At regular intervals, specific matrices and informational documents will be prepared in response to the concerns, discontents and expectations of stakeholders and project affected communities, based on impact assessment surveys conducted by the company's senior management and meetings held for effective consultation. Relevant project information will be disclosed to the public as appropriate and as needed.

6.4 Public Media

Project information, interviews, press releases and similar applications will be made available to the public media as deemed appropriate. These activities will be coordinated under the IMM Anatolian Side Rail Systems Directorate Coordinatorship, through the IMM Public Relations Unit.

6.5 Disclosure Activities

Gülermak-Nurol Metro Construction Partnership will hold information meetings with the affected communities, if necessary, at the project Headquarters under the coordination of IMM Rail Systems Department, Anatolian Side Rail Systems Directorate.

The exact dates and places of these meetings will be announced at least one week before the meeting dates, and announcements will be made through the IMM Public Relations Unit to ensure the participation of communities and other stakeholders in these meetings.

During this participation phase, the public offering and consultation activities will be designed in line with the following general principles:

- Consultation events and opportunities should be widely and proactively announced at least 1 week prior to any meeting, particularly among affected parties.
- The non-technical summary should be available prior to any event to ensure that it is informed of the evaluation content and results prior to the meeting.
- The location and timing of any meeting will be designed to maximize access to project-affected stakeholders.

- The information presented will be clear and non-technical and will be available in local languages. These will be understood by people in the communities.
- Facilitating facilities will be provided to enable stakeholders to raise their concerns.
- Issues raised at the meetings will be answered and followed up.

Information meetings will be open to the public and will be announced to the media. Gülermak-Nurol Metro Construction Partnership will inform the public about how people access the IBP documents and the project timeline and how they can comment on the IBP through meetings, media and similar ways.

7 MANAGEMENT OF GRIEVANCES

The grievance mechanisms for the internal and external stakeholders are summarized in this section. In the scope of the Gülermak's Investment Projects, an "Internal and External Grievance Mechanism Procedure" (GLM- PRC-SOC-GRM-001) will be used.

In this section, issues regarding with the management of grievances developed for UAG Metro Project is given. The same statements will be followed in the scope of the Gülermak's investment Projects if projects do not have a project specific ESMS.

7.1 Grievance and Feedback Procedure

Grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (PAP).

Grievance procedures provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows grievances to address disputes, questions, complaints, requests, recommendations, aspirations and concerns in a fair, easily accessible and transparent manner.

Grievance procedures will be coordinated through the appointed Project Social Officer with the help of OM/PM and CPR Manager. Complainants will have the chance to provide their names in order to gain effective feedback on their QCRRs, however; confidentiality procedures are also available to protect the complainant, as appropriate. PSO is recommended to be nominated from Communications and PR Unit department. The PSO is expected to conduct a bridge between the firm and the stakeholders, in order to formalize the grievance process and procedures.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the

mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project Social Officer and/or through site personnel, if it is not anonymous. Grievances can also be collected from the power plant or project web sites.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of the investments/operations.

7.1.1 Principles of the Grievance Mechanism (Internal and External)

The grievance mechanism is developed to cover the following:

- *Simplicity and necessity:* Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- *Keeping it up-to-date:* The process will be regularly reviewed jointly by the PSO, OM/PM and CPR Manager. Regular monitoring and evaluation should be conducted continuously.
- *Confidential and impartial process, non-retribution:* The process will be confidential and impartial, without employees fearing retribution.
- *Reasonable timescale:* A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- *Keeping of records:* Grievances are tracked and recorded in a written manner, hard and soft copies.
- Workers should not experience retribution for raising concerns through such mechanisms.

In addition, the suggestion and complaint form that can be used by internal stakeholders can be seen in Appendix-A.

7.1.2 Collection, Registration and Evaluation of Grievances

Gülermak-Nurol Metro Construction Partnership has an established external grievance mechanism that can be used by every stakeholder. All kinds of comments and concerns received verbally or in writing (via mail or e-mail) or through the complaint form accessed from the notification boxes will be taken into account. The said form will be placed on the project website. Complaint form can be submitted to the company through the contact information specified for Complaints and Feedback.

Gülermak-Nurol Metro Construction Partnership has developed a detailed customer satisfaction and complaint management procedure, and stakeholders have been informed on

this matter. Gülermak-Nurol Metro Construction Partnership will continue to provide information about the grievance mechanism throughout the life of the project.

All complaints according to Gülermak-Nurol Metro Construction Partnership, customer satisfaction and complaint management procedure:

- ⇒ It will be received in 3 calendar days.
- ⇒ It will be resolved and answered within 30 calendar days. In case of unresolved complaints, the period for informing the complainant shall not exceed 30 calendar days.

Complaint information is recorded in the complaint registration form by specially nominated and trained personnel.

It includes details of the complaint and when it was submitted, accepted, answered and closed. Interested parties and stakeholders are recommended to fill in the complaint and request form below. These complaints and requests are answered in accordance with the procedure. Stakeholders can directly report their grievances at any stakeholder and consultation meeting and by sending the grievance form to the address. More specifically, owners and users of lands will be potentially affected and vulnerable groups will be specifically informed through stakeholder engagement activities.

7.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance is assigned as maximum 30 calendar days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status (that it is received by the Project Office) of their grievance within 3 calendar days of grievance receipt.

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process.

The SEP will be reviewed and revised (if needed) annually, while the grievance mechanism will be continuously reviewed. In addition, the stakeholders list for each of the investment will be reviewed and updated.

7.1.4 Grievance Mechanism Communication

Employees including the contractors and subcontractors should know whom they notify to in case of the event of a QCRR and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted as an electronic version.

For the collection of internal grievances from employees:

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

For the collection of external grievances from community:

- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement and/or public consultation meetings (including the locations of the grievance/suggestion boxes) during investments process and to the mukhtars once the power plant is operational
- The grievance/suggestion boxes will be made available at the Mukhtars offices or villagers' gathering points (such as tea houses etc.) in the nearest settlements; and
- Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances.

The grievance mechanism constitutes two parts: Internal (workers, subcontractors and suppliers of the Project/Investment) and External (local communities, NGOs, etc.). These two mechanisms will have different databases for following-up the performances internally and externally.

Contact Details of Gülermak Heavy Industry Construction and Contracting Inc.

Gülermak Heavy Industry Construction and Contracting Inc.**Address:** Bahçelievler, Ankara Konya Yolu 23. Km, 06830 Gölbaşı/Ankara/Turkey**Telephone:** +90 (312) 484 14 89**Fax:** +90 (312) 484 14 88**Website:** <https://www.gulermak.com.tr/TR/iletisim-24>**E-mail:** insaat@gulermak.com.tr**Contact Details of Gülermak-Nurol Metro Construction Partnership****Gülermak-Nurol Metro Construction Partnership****Istanbul Address:** Tatlısu Mahallesi Alptekin Caddesi G-2 Sokak No:01, 34774

Ümraniye/İstanbul, Turkey

Telephone: +90 (216) 594 74 77**Fax:** +90 (216) 594 18 06**Website:** www.uagmetro.com**E-mail:** info@uagmetro.com

8 REVIEW AND REVISION OF THIS PLAN

This SEP will be reviewed on annual basis; any necessary revisions will be made in the Plan to reflect the changing circumstances or operational needs of the investments/projects and/or according to evaluation/monitoring results of the Plan.

9 MONITORING

9.1 Overview of the Monitoring Requirements

The monitoring measures that are to be implemented to the Gülermak's investment Projects in order to assess compliance with the relevant national and international standards and to evaluate the performance of the implementation of the Plan are described in this section.

In the event that any non-conformances with the standards are identified, these will be investigated, and appropriate corrective actions will be put forward.

A project specific “Grievance Mechanism Register” and a “Stakeholder Engagement Program” should be established for each of the investment.

9.2 Key Monitoring Activities

Gülermak Investment Projects

The Projects will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health, and safety (labor rights) and social performance of the Project mainly through:

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

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

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

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

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are set out in **Table 9-1**.

Table 9-1 Key monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	The Projects will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include: <ul style="list-style-type: none"> ➤ number of outstanding complaints and grievances opened in a month, ➤ number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), ➤ number of complaints grievances closed in the month; and ➤ type of grievance. 	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Site office
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Annually	Site office

In the scope of UAG Metro Project; Gülermak-Nurol Metro Construction Partnership will monitor the implementation of the stakeholder engagement process. These monitoring outputs will also provide information on the management and monitoring of the overall environment and social performance of the project:

- Review, develop or expand monitoring activities, parameters, locations and frequency
- Reviewing and revising management plans and procedures.

Gülermak-Nurol Metro Construction Partnership will monitor the effectiveness of the participation process by analyzing the feedback received from the participation activities, thus involving the stakeholders in the monitoring process.

Where appropriate, stakeholders will be asked questions about the meeting event and the stakeholder engagement process during all engagement activities. These questions will be prepared specifically for the participating stakeholder.

Table 9-2. Key Monitoring Measures

Topic	Method	Responsible	Periodicity
Grievances/ Concerns	<p>Complaint record/database will be reviewed monthly as resolved/unresolved complaints.</p> <ul style="list-style-type: none"> • Number of unresolved complaints and number of complaints filed in a month • Graphical display and follow-up that shows the complaint status from the beginning of the project • Number of resolved complaints • Type of complaint 	<p>Group Management OHS-E Unit</p>	Monthly
Visitors	<p>To consider and evaluate the visits that will take place within the scope of the project:</p> <p>Number of visits</p> <p>Visitor type</p> <p>Type of visit</p>	<p>Financial and Administrative Affairs Directorate</p>	Monthly

Topic	Method	Responsible	Periodicity
public information activities	It includes information activities, audiences and participants within the scope of the project.	IMM Public Relations Unit	6-month period
Material Sharing	Sharing information such as brochures, documents, CDs transferred for information activities within the scope of the project	IMM Public Relations Unit	6-month period
Feedback	It deals with the feedbacks made against the effects such as complaints and notifications that are the basis of the project.	Group Management OHS-E Unit	3-month period

9.3 Key Performance Indicators (KPIs)

Gülermak Investment Projects

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KPIs are given in **Table 9-3**.

Table 9-3 Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measures
Total number of external complaints or grievances	Total number reduced year on year	Grievance Database
Total number of customer complaints or grievances	Total number reduced year on year	Grievance Database
	Total number reduced year on year	Grievance Database

KPI	Target	Monitoring Measures
Total number of internal complaints or grievances		
% of complaints that are responded within 5 days	Respond stakeholders within 5 days at last / delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Monthly reports
% of all complaints (internal, external, customer) that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (installation), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report
% item of Social Responsibility Program that implemented	Target of 80%	Annual reports

In the scope of UAG Metro Project; the key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 9-4. Key Performance Indicators and Monitoring Methods

KPI	Target	Monitoring Method
Grievances	Amount of decrease in 6-month periods	Complaint request registration form
Number of resolved complaints (within a month)	100%	Complaint registration/database
Stakeholder notifications regarding the	Regular sharing of complaint results	Report

KPI	Target	Monitoring Method
implementation of the grievance procedure		
Stakeholder notifications of audit status regarding the implementation of the grievance procedure	at least once a year	Audit Report

10 TRAINING

All necessary training regarding stakeholder communications and grievance mechanism will be provided as induction training to provide general awareness for all employees of the Gülermak and its contractors. Job-specific training to the site personnel, especially to Project Social Officers, will be also provided as necessary for stakeholder engagement and grievance management. The implementation of this stakeholder engagement plan will be followed by the Project Social Officers and other personnel and supervisors of Gülermak for all investments operated.

10.1 Induction Training for Gülermak Investment Projects

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

10.2 Workplace Adaptation Training for UAG Metro Project

All employees and subcontractors of the Gülermak-Nurol Metro Construction Partnership are required to attend community relations and human rights trainings as part of the standard recruitment program. This training is designed to help Turkish and foreign workers in the Gülermak-Nurol Metro Construction Partnership project understand and respect different cultures and perspectives and work effectively as team members and behave appropriately in local communities.

10.3 Job Specific Training for UAG Metro Project

A special training on stakeholder participation and the implementation of the complaint and feedback procedure will be given to the personnel and supervisors of the IMM Public Relations Unit and sub-employers who participate in the activities with the local community or are assigned to control them.

11 AUDIT AND REPORTING

11.1 Internal Auditing

11.1.1 Internal & External Auditing for Gülermak Investment Projects

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

11.1.2 Internal & External Auditing for UAG Metro Project

Compliance will be monitored in accordance with the Gülermak-Nurol Metro Production Partnership audit procedure. All incidents and non-compliances will be reported according to the requirements of the Gülermak-Nurol Metro Construction Partnership ESMS Management system as described in the ESMS Framework document.

The suitability of this plan will be subject to external audit if necessary.

11.2 Record Keeping and Reporting

11.2.1 Record Keeping and Reporting for Gülermak Investment Projects

Record keeping will be done during the following cases:

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

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

11.2.2 Record Keeping and Reporting for UAG Metro Project

According to Gülermak-Nurol Metro Construction Partnership procedures, the following records will be kept:




- Consultation meetings and Stakeholder engagement activities
- Stated complaints (including IMM White Desk 153)
- Opinions/suggestions/comments provided by community members during consultation meetings and stakeholder engagement events (to be recorded in the grievance mechanism).
- Press releases and interviews (via IBB Rail System Department, Anatolian Side Rail Systems Directorate)

Audit logs, inspections and events on monthly basis, an overview of the QCRRs recorded in terms of number and type will be investigated. The status of the grievances will be developed periodically as open/ongoing/closed out. The Project Social Officers and CPR Department will evaluate and conclude this overview with project management in the monthly internal progress meetings.

APPENDICES

- **Appendix A: Internal Stakeholders Complaint and Suggestion Form**
- **Appendix B: Grievance Database Example**
- **Appendix C: Complaint Register Form for Gülermak Investment Projects**
- **Appendix D: Consultation Form for Gülermak Investment Projects**

Appendix A: Internal Stakeholders Complaint and Suggestion Form

ÖNERİ VE ŞİKAYET FORMU		
 GÜLERMAK	 nurol	 MAKYOL
Proje Adı: Ümraniye Ataşehir Göztepe Metro Projesi	Bildirim No:	
Bildirim Yapan Adı Soyadı:		
Bölümü/Görevi:		
Telefon:	E-mail:	
Lokasyon:		
Öneri/Şikâyet Tarihi:	Öneri/Şikâyet Saati:	
İmza:		
Öneri / Şikâyet Konusu		
<div style="border: 1px solid black; height: 150px;"></div>		
Öneri / Şikâyet Bildirimi Yapanın Görüşü		
<div style="border: 1px solid black; height: 150px;"></div>		
UAG-FR-YS-004_00		
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Appendix B: Grievance Database Example

Grievance Database									
Reporting Period									
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date and method (via call/SMS message/face to face): If complainant has provided a name and contact information, he/she will be notified within 3 days that the grievance solution process has started.									
** Notification date and method (via call/SMS message/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within maximum 45 working days.									

Appendix C: Complaint Register Form for Gülermak Investment Projects

Grievance Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:		
Date of Incident/Grievance		
	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details):		

Appendix D: Consultation Form for Gülermak Investment Projects

TOPLANTI KAYIT FORMU / CONSULTATION FORM			
Formu Dolduran Kişi / Person filling out the form		Tarih / Date:	
Toplantı Gündemi / Agenda of the Meeting		Görüşme Kayıt No/ Consultation Register Number	
1. Toplantı Bilgileri / Meeting Information			
Name of Authorized Person:		İletişim Şekli / Form of Communication :	
İstişare Edilen Kurum / Institution Consulted		<input type="checkbox"/> Telefon-Ücretsiz Hat / Phone-Free Phone Line	
Telefon / Telephone:		<input type="checkbox"/> İstişare Toplantısı / Consultation Meeting	
Adres / Address:		<input type="checkbox"/> Website / E-mail Web Sitesi / E-posta	
Köy - İlçe - İl Village -District -Province:		<input type="checkbox"/> Diğer (Açıklayın) / Other (Specify)	
Paydaş Tipi / Consultee/Stakeholder Type			
2. İstişare Detayları / Details of Consultation			
Projeye İlişkin Sorular / Questions regarding the project :			
Kaygılar & Geri bildirimler / Concerns & Feedbacks :			
Özel Notlar (Formu dolduran kişinin düşünceleri)			



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