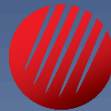




Draft Report

Stakeholder Engagement Plan
Plan No: ATK-PLN-SOC-SEP-001

*Atik Metal San. Ve Tic. A.Ş. Operational Capital Investment
Project*



**KALKINMA
YATIRIM
BANKASI**

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Abbreviations

Aoi	Area of Impact
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OIZ	Organized Industrial Zone
PAP	Project Affected People
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff
The Project	Atik Metal San. Ve Tic. A.Ş. Operational Capital Investment Project
TKYB	Development and Investment Bank of Turkey
WB	Environmental and Social Standards

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared “Atik Metal San. Ve Tic. A.Ş. Operational Capital Investment Project” (“Project”). This SEP, which identified target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according to IFC Performance Standards (“PSs”), Environmental and Social Policies of TKYB and WB Environmental and Social Standards (“ESSs”). The reference number of this Plan is ATK-PLN-SOC-SEP-001.

This is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

1.1 Background

In 1954, Atik Metal has stepped into the foundry industry under the name of Atikler Koll. Sti. and accomplished the first black temper, then the first ductile iron production in Turkey. Since 1967, AKDOKUM San. Tic. A.Ş. have been producing high quality parts for truck and tractor industries as well as parts for pumps and industrial valves.

In 2008, a greenfield foundry in Aliaga Organized Industrial Zone, under the name of Atik Metal San. Ve Tic. A.S. was established. With the help of the most advanced foundry technologies, these investments were given start in 2011 with annual capacity of 50.000 tons. As the second step of these investments, Atik Metal invested in machining facility in 2011 by moving its facility to Ataturk Organized Industrial Zone in Çiğli District of İzmir Province with a new building and increased number of new CNC machines. Since August 2012, aforementioned industrial parts have been machining in Çiğli Branch of Atik Metal.

Today, Atik Metal is exporting 95% of the production to the well-known global companies. With its 500 experienced employees, Atik Metal San. Ve Tic. A.S is now one of the most reliable companies in foundry industry. Site Location Map of Çiğli Branch of Atik Metal is illustrated in **Hata! Başvuru kaynağı bulunamadı..**

1.1.1 Area of Influence

Settlements within the Aol of the Project, and population information of each settlement is presented in Table 1-1.

Table 1-1 Settlements in the Aol

Neighborhood	Direction to the Project Site	Population		
		Total	Female	Male
Kaklıç Neighborhood	West	1,673	46%	54%
Ataşehir Neighborhood	Southeast	27,051	51%	49%

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Neighborhood	Direction to the Project Site	Population		
		Total	Female	Male
Küçük Çiğli Neighborhood	Northeast	20,510	50%	50%
Balatçık Neighborhood	North	14,801	45%	55%
Yeni Mahalle Neighborhood	Northeast	11,770	51%	49%



Figure 1-1 Site Location Map of Atik Metal (Çiğli Branch)

1.2 Purpose

The goal 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 SEP is to:

- Identify stakeholders and their interest to the Project,
- Set out applicable management interfaces,
- Define roles and responsibilities,
- Outline the applicable project standards relevant to this Plan,
- Define Project commitments, operational procedures and guidance relevant to this Plan,
- Define monitoring and reporting procedures, including the key performance indicators (KPIs) of stakeholder engagement activities,
- Define training requirements,
- Set out references for supporting materials and information,
- Outline communication tools.

This Plan also aims to create long-term relations between the Project and local communities based on mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, its investments, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

The other goal of this SEP is to describe the most effective methods by:

- Keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- 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
- Understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.3 Scope

This Stakeholder Engagement Plan covers all Project activities including associated facilities and contractors' activities during the operational phase of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

This Plan is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- Grievance Mechanism Procedure (Internal and External),
- Air Quality Management Plan,
- Occupational Health and Safety Management Plan,
- Emergency Response Action Plan.,

1.4 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally Appropriate	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
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.

Stakeholder Engagement Plan

Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and 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.
Vulnerable People	People who by virtue of 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 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section. Key roles and responsibilities for the implementation of this Plan are outlined in Table 2-1.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Board of Management	<ul style="list-style-type: none"> Approval of this Plan and resources required for implementation, Ensuring this plan is implemented during the lifetime of the Project, Determination of the policies and targets regarding the social communication and stakeholder engagement, Ensuring the facility's compliance with the Project Standards, and other requirements set out in this Plan, Providing necessary resources for proper implementation of this SEP and GMP (internal and external), Making the final decision concerning internal and external grievances (if needed) in the light of the assessments of the Social Responsibility Staff (SRS) and relevant department managers, Determination of the social budget of the Project.
General Manager	<ul style="list-style-type: none"> Having overall responsibility for the implementation of this SEP by fulfilling project requirements, Determination of necessary resources for the proper implementation of this SEP and reporting it to Board of Management for procurement, Ensuring implementation of the commitments in this Plan.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Implementation of the SEP and GMP, Coordination among the parties for proper implementation of this Plan, Reporting to the General Manager about the system performance, Ensuring national and international legislations/guidelines which are applicable to the Project activities are identified and tracked, Recording all formal and informal engagement activities with local communities in Stakeholder Management System, Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement quarterly reports, Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement quarterly reports, Forming relationships with the Project stakeholders,

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Roles	Responsibilities
	<ul style="list-style-type: none"> • Organizing stakeholder meetings to collect the responses to grievances actively as required, • Providing regular reporting back to the community on the management related to community grievances, • Determining and providing the necessary training materials for employees, • Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.), • Searching 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, • Monitoring all complaints and ensuring that all complaints are resolved and closed properly and in a timely manner, • Following the results of complaint and reporting on a weekly, monthly, and annual basis, • Recording and reporting general and local employment rates and complaints, which are received or observed verbally, • Filling out the “Complaint Register Form & Consultation Form” (see Appendices A and B), • Giving 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 information will be notified within 5 days that the grievance solution process has started and after the grievance closed).
HSE Staff	<ul style="list-style-type: none"> • Making periodic inspections of the performance of Contractors of its activities during operation phase, • Working in cooperation with other departments to determine targets for Environmental, Social, HS and resource efficiency, • Determination of the national and international legislations that are applicable to the Project activities and informing the General Manager, • Determination of the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Ensuring that all provisions in the Contractor engagements regarding environmental, social and HS requirements as per the Project Standards during operation phase and auditing the performance of the Contractors on those requirements, • Providing answers to the OHS grievances raised by employees, the local community, and local institutions, • Checking the OHS records and performance reviews of the Contractors.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> • Uploading all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, • Recording and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, • Making documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors / Suppliers & Employees	<ul style="list-style-type: none"> • Ensure that relevant activities are undertaken in accordance with this Management Plan and related Procedures.

3 NATIONAL AND INTERNATIONAL STANDARDS

This SEP is prepared based on national and international requirements and standards. During the lifetime of the Project, “Project Standards” will be followed which consist of:

- Applicable Turkish Standards,
- Turkish EIA requirements,
- Environmental and Social Policy of TKYB,
- Other commitments to and requirements of Turkish Government authorities,
- Applicable international standards and guidelines.

3.1 Applicable National Standards

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 labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

I. Legal Egalitarianism

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

II. Prohibition of Forced Labor

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

III. 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.

IV. 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.

V. Right of Petition

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

Law on The Right to Information

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

Law on The Use of Right to Petition

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

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.

Unions and Collective Agreements Law

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

Environmental Law

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

3.2 Environmental and Social Policy of TKYB

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

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

The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,

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- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system,
- Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

3.3 Applicable International Standards, Legislations and Guidelines

International standards to be applicable by the Project are the IFC Performance Standards and WB ESSs. Particularly, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement. Basic objectives of international standards and guidelines are as follows:

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

Stakeholder Engagement Plan

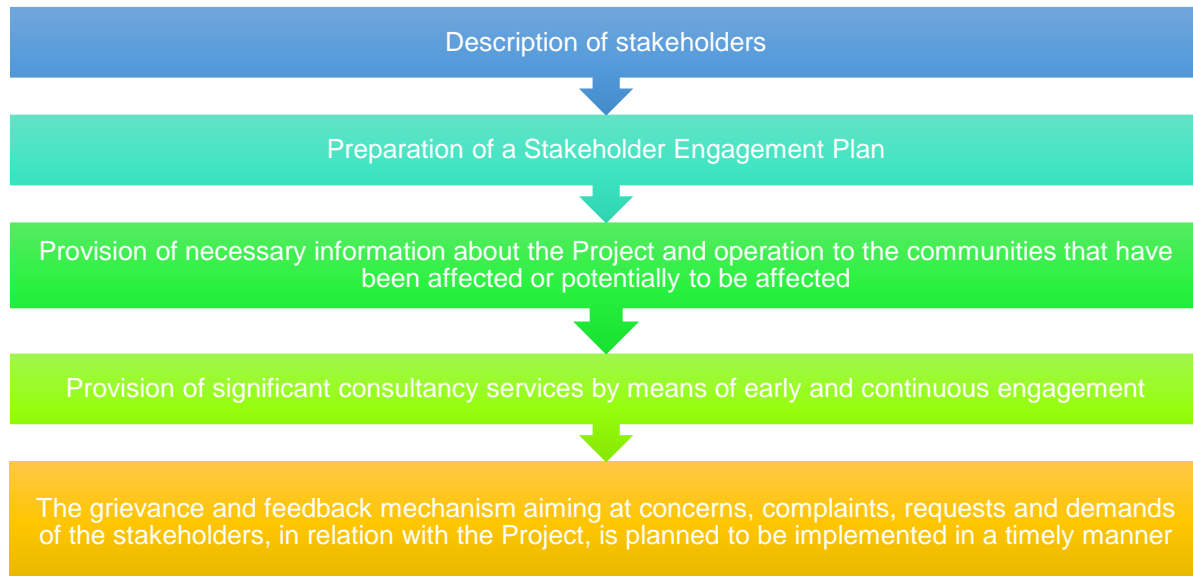


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.3.1 IFC Performance Standards

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

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

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

- Stakeholder Identification and Analysis

Stakeholder Engagement Plan

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

3.3.2 WB Requirements

The objectives of ESS 10 Stakeholder Engagement and Information Disclosure are set by WB as follows:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

3.4 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

The facility located in Aliğa Organized Industrial Zone, which is one of the facilities of Atik Metal, has been evaluated in the Annex-2 list in accordance with the national EIA legislation (Decision date: 22.03.2021 and Decision No.: E.2021123). In accordance with the national EIA legislation, there is no obligation of Public Participation Meeting for the projects evaluated under the Annex-2 list.

4.2 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 Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening 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 identified stakeholders are presented in Table 4-1 **Hata! Başvuru kaynağı bulunamadı..**

Table 4-1 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
External Stakeholders		
Local Communities (Settlements in the Aol)		
Mukhtars and residents of the following neighborhoods <ul style="list-style-type: none"> Kaklıç Neighborhood Ataşehir Neighborhood Küçük Çiğli Neighborhood Yeni Mahalle Neighborhood Balatçık Neighborhood 	✓	
Government		
<ul style="list-style-type: none"> Ministry of Environment, Urbanization and Climate Change Ministry of Industry and Technology İzmir Provincial Directorate of Environment, Urbanization and Climate Change İzmir Provincial Directorate of Industry and Technology 		✓
Municipalities		
<ul style="list-style-type: none"> İzmir Metropolitan Municipality Çiğli Municipality 		✓
NGOs		
<ul style="list-style-type: none"> İzmir Chamber of Commerce İzmir Chamber of Industry 		✓
Private Organizations		
<ul style="list-style-type: none"> İzmir Atatürk OIZ 		✓
Lender		
<ul style="list-style-type: none"> TKYB WB 		✓
Internal Stakeholders		
<ul style="list-style-type: none"> Atik Metal Employees Contractors/Subcontractors/Suppliers 	✓	✓

4.3 Stakeholder Engagement Program

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

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

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan,
- Meetings with regulatory bodies,
- Public meetings
- Published on local municipalities' website (if available) and/or on a dedicated Project website,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

- Stakeholder groups to be consulted,
- Engagement topics,
- Type of information disclosed / engagement methods,
- Frequency and responsible.

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Table 4-2 Stakeholder Engagement Program

ID	Target Group	Engagement Topics	Project Phase	Method of Engagement	Frequency	Responsible
SEP 1	-All affected settlements and Interested parties -Local communities -Local government -Local business	Information Disclosure <ul style="list-style-type: none"> • Purpose, stages, general information about the Project and its environmental and social impacts • Implementation of mitigation measures related to relevant social and environmental impacts • Grievance mechanism • Monitoring objectives and activities to be performed • Disclosure information (SEP and GMP) via Project website for the review 	Operation phase	Public Participation Meeting	Upon Environmental and Social Management Plans are approved	SRS
SEP 2	-Local businesses -All affected settlements and mukhtars	Employment and Procurement Strategies <ul style="list-style-type: none"> • Recruitment of employees • Training of staff • Procurement of supplies and services 	Operation phase	Public Participation Meeting or depending on the requests of the stakeholder group	After the Environmental and Social Management Plans are approved	SRS
SEP 3	NGOs	Social progress, economic and social development and environmental protection Information and consultation on: <ul style="list-style-type: none"> • Mitigation measures against potential environmental and social risks • Sustainability • Social responsibility projects, implementation principles 	Operation phase	Focus group meetings (with NGOs' representatives and members) Project website	As needed / If requested	SRS
SEP 4	-All affected settlements and mukhtars	Traffic and Transportation Management <ul style="list-style-type: none"> • Road safety awareness, including on safe crossing of the bypass and access roads • Types, number and frequency of vehicles that will be used in operation phase 	Operation phase	Face to face meetings or focus group meetings depending on the requests of the stakeholder group	As needed / If requested	SRS

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ID	Target Group	Engagement Topics	Project Phase	Method of Engagement	Frequency	Responsible
		<ul style="list-style-type: none"> Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns) Communication of traffic measures and Project area access road usage with mukhtars 				
SEP 5	-All affected settlements and mukhtars	<p>Management of environmental and social risks of the Project Information on:</p> <ul style="list-style-type: none"> Environmental and social monitoring program Environmental and social monitoring results Overall information about progress of the Project 	Operation phase	<p>Meetings with Mukhtars</p> <p>Brochures</p> <p>Announcements on Project Website</p>	As needed / If requested	SRS
SEP 6	Vulnerable Groups	<p>Employment and any other interest of vulnerable groups Information on:</p> <ul style="list-style-type: none"> Recruitment of disabled employees General information of the project, environmental and social impacts, mitigation measures, monitoring activities of the project Special measures for the vulnerable groups 	Operation phase	Focus group meetings (with disabled people and their representatives accompanied by relevant specialist depending on the disabled group)	As needed / If requested	SRS

4.4 Tools and Methods for Information Disclosure

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

4.4.1 Internal / Website

Project specific web site (www.atikmetal.com.tr) will keep information on the operations updated on an assigned website in both Turkish and English. Company facilities' physical address, telephone numbers and maps are given in the Company Website Communication Page (**Hata! Başvuru kaynağı bulunamadı.**). In fact, informative brochures, Grievance Mechanism Procedure should be available on this assigned website, and through this website, it should be possible to send grievances to the company.

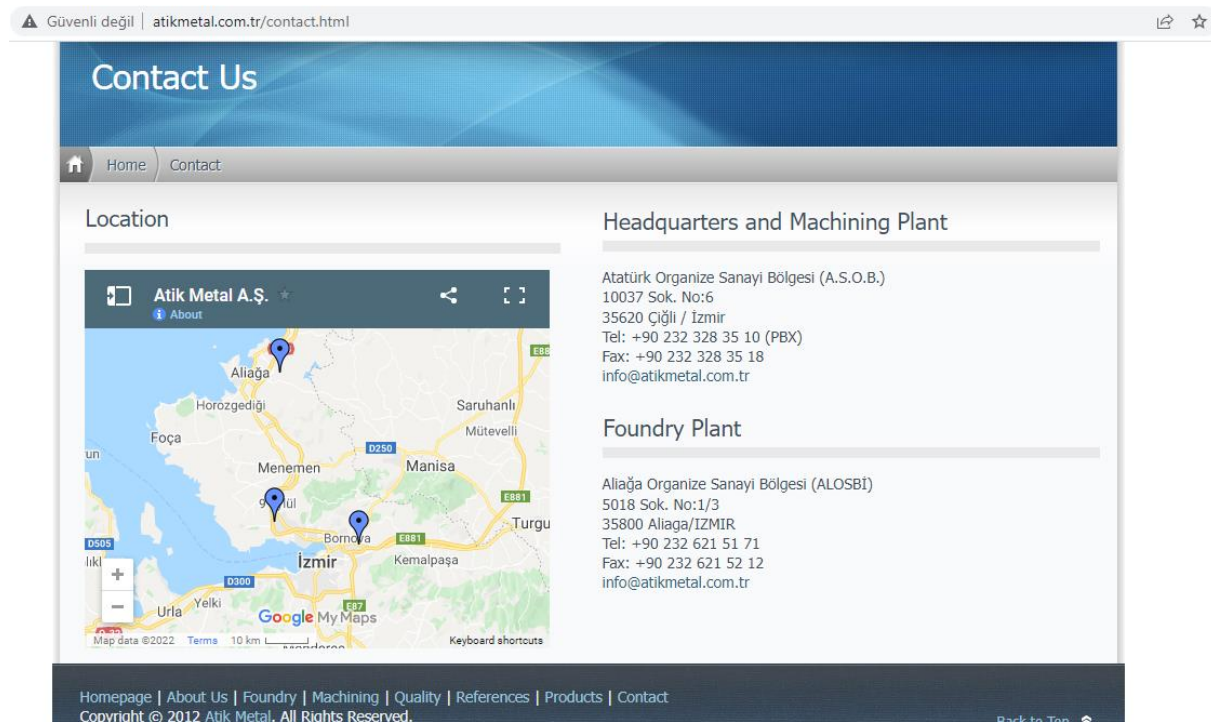


Figure 4-1 Communication Webpage of Atik Metal

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned websites and at the facilities offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 Responding to Local Communities and Publications for the Communities

Authorities of the facilities give full and timely responses to request, complaints and recommendations of local communities in addition to implementing the grievance mechanism procedure. All requests are treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of grievance mechanism procedures.

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

4.4.4 Disclosure Activities

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

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

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women for

women-only meetings. The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP and Grievance Mechanism Procedure.) and the project timetable, and how they can submit comments, complaints and suggestions.

In case of unexpected pandemic situations like COVID-19, it is required to develop safe and effective stakeholder engagement and grievance management for maintaining a proactive communication process and providing communities with information in a timely manner. The alternative communication methods such as online platforms should be produced and provided by the Project. Based on the principles of stakeholder engagement and grievance mechanism, alternative communication tools and methods can be as follows:

- Digital platforms, social media and messaging platforms,
- Secure grievance portal and announcements through the Project website,
- Online stakeholder engagement workshops by using live web streaming,

Multiple communication options such as closed captioning for video/conference calls.

5 MANAGEMENT OF GRIEVANCES

5.1 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 Affected People (PAP).

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

Grievance procedures will be coordinated through the appointed Social Responsibility Staff (SRS) who is the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from Human Resources department. The SRS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

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

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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 company SRS, if it is not anonymous.

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

5.1.1 Principles of the Grievance Mechanism (Internal and External Grievance Mechanism)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- **Keeping it up to date:** The process will be regularly reviewed jointly by the SRS. 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 calendar days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

5.1.2 Collection, Registration and Evaluation of Grievances

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

- Initiate the grievance procedure by filling up a Complaint Register Form (see Appendix A), mainly by the SRS,
- SRS registers the grievance/comment in the grievance database (see Appendix E),
- The SRS investigates the grievance and makes the first evaluation with the help relevant Department Chief,
- Final decision is made, and further action is implemented in order to solve the grievance,
- The complainant is notified (if name provided) within 5 working days that the grievance solution process has started,
- The complainant is informed about the resolution (at most in 30 calendar days after the grievance is received),
- The grievance is officially closed after related documentation (Grievance Closure Form given in Appendix D) is completed, and

- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated among the related departments; however, handling and tracking should be ensured to be done mutually.

A complaint register form is prepared for official notification of complaints about the Project. "Open door policy" shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

5.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 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 of their grievance within 5 working 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. It is also important to monitor to ensure that expectations are managed, and the Project builds a more meaningful relationship with stakeholders. This is essential in maintaining a 'social license to operate', which refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

The SEP will be reviewed and revised (if needed) annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated, if necessary.

5.1.4 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the first HSE training sessions will also include the stakeholder engagement and grievance mechanism process,

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- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings,
- The grievance/suggestion boxes will be made available at the Project facility sites for internal grievances, and
- All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

For the collection of external grievances from community:

- Grievance mechanism process will be communicated with external stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion),
- 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 (either through web site or with grievance/suggestion boxes).

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of the Project). These two mechanisms will have different respondents: External Grievance Mechanism will be run by the SRS, while internal grievances will be under the responsibility of SRS and collaborating different departments such as Quality Control, HSE and HR. A sample of the internal grievance form is presented in Appendix C.

5.2 Contact Details

The existing contact details of the Project is given below. The contact information regarding the assigned SRS (name and contact number/e-mail address) should be included when this Plan is updated. Also, it is recommended that an online grievance register form should be integrated into the Project website.

Table 5-1. Contact Details of the Project

Atik Metal Çiğli Branch – Headquarters and Machining Plant	Contact Details of SRS
<p>Address: Atatürk Organize Sanayi Bölgesi (A.S.O.B.) 10037 sok. No:6 35620 Çiğli / İzmir Telephone: +90 232 328 35 10 (PBX) Fax: +90 232 328 35 18 e-mail: info@atikmetal.com.tr</p>	<p>Name: To be determined Address: Atatürk Organize Sanayi Bölgesi (A.S.O.B.) 10037 sok. No:6 35620 Çiğli / İzmir Telephone: To be determined e-mail: To be determined</p>

6 MONITORING

6.1 Review and Revision of this Plan

This SEP will be reviewed annually during operation. During steady state operations, this Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of the Project. Revision of this Plan will be the responsibility of SRS.

If the circumstances change, this Plan may be updated on an “as required” basis.

Any revisions to this Plan will be uploaded to the Document Control Center (DCC) and the Project website to ensure that all internal and external stakeholders have access to the latest version of this SEP.

6.2 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the stakeholder engagement performance.

Table 6-1. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 working days	100% of the complaints are closed within 30 working days	Grievance Database
% of visitors that received Visitor Training on general site rules, especially OHS issues	100% of the visitors are received Visitor Training	Visitors Registers
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report

6.3 Key Monitoring Activities

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

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

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

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

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

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

The key monitoring activities will focus on ensuring compliance with the requirements set out in this Plan using the key performance indicators.

Table 6-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<p>The Project will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> • number of outstanding complaints and grievances opened in the 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 Database	Monthly	Project Site
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Project Site

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Project Site
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	Project Site
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	Project Site

7 TRAININGS

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training will be also provided as necessary including grievance management procedure. The implementation of this grievance mechanism will be followed by the Social Responsibility Staff and other personnel and supervisors of the Project Contractors are also involved in the stakeholder engagement activities and grievance mechanism procedure.

7.1 Induction Training

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. This training will provide the information on how to understand and respect different cultures and opinions and to be an effective team member by behaving appropriately with locals and colleagues.

7.2 Job Specific and Other Training Requirements

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

8 AUDITING AND REPORTING

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

8.1 Internal Auditing

Routine internal inspections will be carried out by Social Responsibility Staff during the operational phase regarding the proper implementation of SEP. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits.

8.2 External Auditing

The conformance with this SEP will be subject to periodic assessment as part of the Atik Metal audit program and separately by Project Lenders.

8.3 Record Keeping and Reporting

Record keeping will be done by SRS during the following cases:

- Consultation meetings,
- 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 according to the Project procedures.

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

APPENDICES

Appendix A: Complaint Register Form

Appendix B: Consultation Form

Appendix C: Internal Grievance Form

Appendix D: Grievance Closure Form

Appendix E: Grievance Database

Appendix A: Complaint Register Form

Complaint Register 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 B: Consultation Form

Consultation Form									
Reference No:									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			Communication Type						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

Appendix C: Internal Grievance Form

Reference No:		
Full Name Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the 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:
Complaint is closed by:		
Actions taken (Provide details):		

Appendix D: Grievance Closure Form

Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Date: /...../.....	Name Surname / Signature of the Person Closing the Complaint
	Name, Surname / Signature of Complainant



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