
HEZ ENERJİ İNŞAAT SAN. VE TİC. A.Ş

Moralı Geothermal Power Plant Project

STAKEHOLDER ENGAGEMENT PLAN (SEP)

NOVEMBER 2023
ANKARA



HEZ ENERJİ İNŞAAT SAN. VE TİC. A.Ş

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LIST OF ABBREVIATIONS

AoI	Area of Influence
CLO	Community Liaison Officer
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment
ETL	Electricity Transmission Line
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
GPP	Geothermal Power Plant
GRM	Grievance Redress Mechanism
GBV	Gender-Based Violence
HR	Human Resources
IFC	International Finance Corporation
OHS	Occupational Health & Safety
OP	Operational Manual
PAP	Projected Affected Persons
PSs	Performance Standards
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
TURKSTAT	Turkish Statistical Institute
TEIAS	Turkish Electricity Transmission Inc. (Türkiye Elektrik İletim A.Ş.)

GLOSSARY

The Bank	TSKB - Türkiye Sınai ve Kalkınma Bankası
The Project Company – Hez Energy	HEZ Enerji İnşaat San. ve Tic. A.Ş
The Projects	Moralı Geothermal Power Plant Project
GPP Project	Moralı Geothermal Power Plant Project – 24 MWe
Greenhouse Project	5 Ha Geothermal Greenhouse Project
Exploration Projects	Geothermal Resources Exploration Drilling Well Projects
The Standards	Legal requirements and IFC Performance Standards/World Bank WBG OPs (OP 4.01, OP 4.04, OP 4.11 & OP 4.12)

EXECUTIVE SUMMARY

This document presents Stakeholder Engagement Plan (SEP) for the 'Moralı Geothermal Power Plant Project (hereinafter referred to as "the Projects") and has been prepared by 2U1K Engineering and Consultancy Inc. on behalf of "HEZ Enerji İnşaat San. ve Tic. A.Ş." (herein after 'the Project Company- Hez Energy).

The Project Company seeks potential financing from Türkiye Sınai Kalkınma Bankası (TSKB) for the construction and operation activities. The Project is committed to follow IFC (International Finance Corporation) PS (Performance Standards), World Bank Group Safeguard Policies, as well as the Guidelines of the World Bank Group (IFC Environmental, Health and Safety Guidelines (EHSs)).

The ESIA report has been prepared for the Project to identify and assess the potential environmental and social impacts and define appropriate mitigation, management, and monitoring measures. The SEP has been prepared as an annex to the ESIA to manage the stakeholder engagement process throughout the life of the Project.

TSKB, which is referred to as the potential Lender, is considered to finance to construct 24 MWe Moralı Geothermal Power Plant and Exploration Drilling Projects (including the Electricity Transmission Line (ETL) and geothermal pipeline) within the geothermal resource operation license with the 2009-138 license number (4083.78 ha area) in Aydın province, Söke district, Argavlı Neighbourhood and Germencik district Moralı, Uzunkum Neighbourhoods.

A total of 54,577 m² of land acquisition has been completed for the switchyard and drilling locations. The lands were acquired through willing buyer willing seller arrangements and obtaining consent from individuals.

The Project Company has determined the planned route of the geothermal pipeline within the scope of the Environmental Impact Assessment (EIA) license in the designated area. The route of the geothermal pipeline is approximately 3.30 kilometers long and it runs between Argavlı Neighbourhood in Söke District and Uzunkum Neighborhood in Germencik District. The route of the geothermal pipeline is planned to pass along the roads surrounding agricultural lands, so land acquisition is not anticipated.

However, during the construction, if there is a boundary violation or a need for additional land arises, agricultural lands may be affected, and land acquisition or expropriation may be necessary. In addition to the initially designated route for geothermal pipeline, an alternative route has been planned to run parallel to the irrigation canal. The use of the alternative route will require the approval of the General Directorate of State Hydraulic Works.

Associated with the Project, the Electricity Transmission Line (ETL) will be established following the approval of TEIAS (Türkiye Electricity Transmission Corporation A.Ş.). The power plant will be connected to the Kubilay GPP-Maren GPP Energy Transmission Line. The Project Company has designed a route for Electricity Transmission Lines (ETL) and submitted it for

approval by TEİAŞ. Careful consideration has been given to avoid traversing through privately owned properties, with the exception of a single point where the electricity cable will cross a private property (affecting 2 parcel owners), spanning a distance of 120 meters. The Project Company will provide easement payments for the right of passage, and apart from the necessity of planting tall trees for safety purposes, the landowners' use of the affected land will not be unduly restricted.

Land acquisition needs will be clearly determined prior to construction. If land acquisition/lease/expropriation is required during the construction and operation of the geothermal pipeline and electricity transmission line, a Resettlement Action Plan for the project will be prepared to ensure that land acquisition and/or expropriation is carried out in accordance with World Bank requirements and national legislation. The plan will aim to minimize land acquisition and provide fair valuation and compensation, especially for agricultural lands. It will be ensured that no construction works can start before all land acquisition is completed, and Project Affected Persons (PAPs) are compensated in line with Bank policies as will be defined in RAP. The Project Company will consult with landowners along the route and take into account the concerns and requests of the stakeholders. Additionally, the Company will create suitable crossings (omega) to not obstruct access to field entrances.

The activities under this Project are included in Annex-I according to the Turkish EIA legislation, and therefore an EIA Report is prepared for the Project and EIA positive decision was taken in 2022.

As per WB O.P. 4.01, projects are classified in categories A, B or C depending on the severity of their potential impacts on the environment. Furthermore, Category B projects can be divided into two within its structure as B and B+ projects (this is a practical usage, this is not defined in OP 4.01 of WB Policy). Category B+ projects have relatively more impacts and mitigation measures comparing to Category B projects, yet the impacts and mitigation measures are not significant enough to be recognized as Category A projects (GEOHERMAL DEVELOPMENT PROJECT, 2021). The Project is specified as Category B+ project which resulting environmental and/or social impacts that are specific to the location of the facility and/or with impacts that could be easily identified and prevented.

1 INTRODUCTION

This plan presents the Stakeholder Engagement Plan (SEP) that will be used in construction and operational phases for “Moralı Geothermal Power Plant Project” (hereinafter referred to as “the Projects”) and has been prepared by 2U1K Engineering and Consultancy Inc. on behalf of “HEZ Enerji İnşaat San. ve Tic. A.Ş.”(herein after ‘the Project Company- Hez Energy).

The project involves the construction of a 24 MWe Geothermal Power Plant, and Drilling activities (including the Electricity Transmission Line (ETL) and geothermal pipeline) within the geothermal resource operation license area in Aydın province, Söke district, Argavlı Neighbourhood, and Germencik district Moralı, Uzunkum Neighbourhoods.

A total of 54,577 m² of land acquisition has been completed for the switchyard geothermal power plant and drilling locations. The lands were acquired through willing buyer willing seller arrangements and obtaining consent from individuals.

The Project Company applied to TSKB for finance. The Project is committed to follow IFC PS, World Bank Group Safeguard Policies, as well as the Guidelines of the World Bank Group (IFC Environmental, Health and Safety Guidelines (EHSs)). This plan is prepared in parallel with the Environmental and Social Due Diligence Report and the Environmental and Social Impact Assessment developed for the Project.

The purpose of the Stakeholder Engagement Plan is to guide the Project Company to:

- Build and maintain a constructive relationship with the stakeholders, especially affected communities,
- Promote improved environmental and social performance through effective engagement with the stakeholders,
- Promote and provide means for adequate engagement with affected communities and to ensure that meaningful environmental and social information is disclosed to such communities and to other stakeholders,
- Ensure that all stakeholders have ways to access information and raise issues, and
- Ensure that project-affected communities have accessible means to raise issues and grievances, and the Project Company responds to and manage such issues and grievances appropriately.

This SEP includes; (i) the identification of stakeholders for the Project, (ii) analysis of relationships of the stakeholders with the Project, (iii) details of consultation methodologies, (iv) activities carried out to-date and those planned for the future of the Project, (v) details of the process for managing stakeholders’ concerns and grievances, and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

The Project Company is committed to implement this plan throughout the project lifecycle. Additionally, the Project Company will be responsible for the regular monitoring and, if necessary, revision of this plan.

2 ABOUT PROJECT

This document is Stakeholder Engagement Plan (SEP) for the ‘Moralı Geothermal Power Plant Project’ and has been prepared by 2U1K Engineering and Consultancy Inc. on behalf of “HEZ Enerji İnşaat San. ve Tic. A.Ş.” (herein after ‘the Project Company- Hez Energy).

The Project involves the construction of a 24 MWe Geothermal Power Plant, and Drilling activities (including the Electricity Transmission Line (ETL) and geothermal pipeline) within the geothermal resource operation license area in Aydın province, Söke district, Argavlı Neighbourhood, and Germencik district Moralı, Uzunkum Neighbourhoods.

The area and the location of the Project components are summarized below in Table 2-1.

Table 2-1. Project Components Location

Name of the Area	Location of the Area				Size of the Area (m ²)	Explanation
	District	Neighbourhood (location)	Block	Parcel		
Drilling Area No. 1	Germencik	Moralı	228	1	10,290	HEZ 1-2-3-9-10 wells and common units (drilling platform area, test water pool, sludge management pools, storage area, construction site)
Drilling Area No. 2	Söke	Argavlı/Korkuyu	145	7	10,877	HEZ 4-5-6-7-8 wells and common units (drilling platform area, test water pool, sludge management pools, storage area, construction site)
Drilling Area No. 3	Söke	Argavlı/Korkuyu	139	1	11,069	ARG 1-2 wells and common units (drilling platform area, test water pool, sludge management pools, storage area, construction site)
GPP Area	Germencik	Moralı	228	4, 5, 6	30,334	Organic Rankine Cycle (ORC) with 24 Mwe installed power, turbine, generator, switchyard, emergency pool, administrative and social buildings

A total of 54,577 m² of land acquisition has been completed for the switchyard, geothermal power plant and drilling areas. The lands were acquired through willing buyer willing seller arrangements and obtaining consent from individuals. There are no formal or informal users in the aforementioned areas.

The Project Company seeks potential financing from Türkiye Sınai ve Kalkınma Bankası (TSKB) for the construction and operation activities therefore, the Project Company has

appointed 2U1K for the preparation of ESIA (Environmental and Social Impact Assessment) Report after an ESDD study conducted for the Project. ESIA report aims to identify and assess the potential environmental and social impacts and define appropriate mitigation, management, and monitoring measures in line with IFC (International Finance Corporation) Performance Standards (PS)/ WBG Safeguard Policies (herein after “the Standards”) ((IFC, 2012), (World Bank, Safeguard Policies)).

The Project will be monitored by an independent Consultant every 3 months during the construction periods and annually during the operational periods.

2.1 Project Location

The Project area which is provided on the map given in Figure 2-1 is located in Moralı Neighborhood of Germencik District; Argavlı Neighborhood of Söke District of Aydın Province. The license area covers about 4083.78 ha hectares of which the Geothermal Power Plant area covers an area of 3.0334 ha. The map below includes the Geothermal Power Plant, wells, and the license area for which the Project Company secured geothermal operation license. The geothermal resource operation license with license number 2009-138 of 4083.78 ha consists of two (2) polygons.

In Figure 2-1 the power plants, and well locations, which are all Project components, are located and surrounded by agricultural lands are presented.

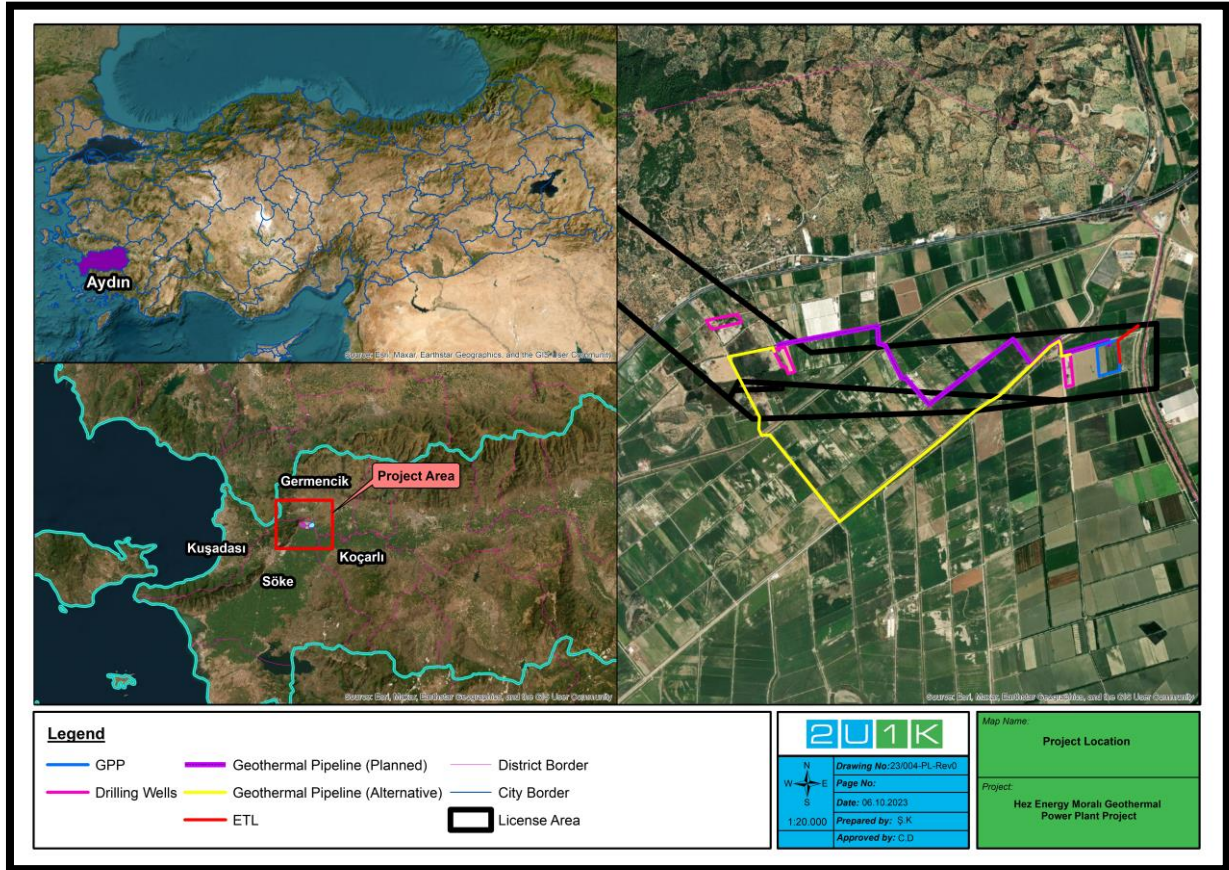


Figure 2-1. Project Location

Aoi for Social Impacts

The Aoi for social impacts was determined by considering transportation activities, recruitment, and use of workers during construction of the Project, noise and dust generation during construction and operation of the Project, and air quality impacts related to construction activities. For this reason, an area covering Moralı Argavı and Uzunkum neighborhoods was determined as the primary social impact area. Neighborhoods and sensitive receptors identified as primary social impact area due to their proximity to the project area are given on Figure 2-2.

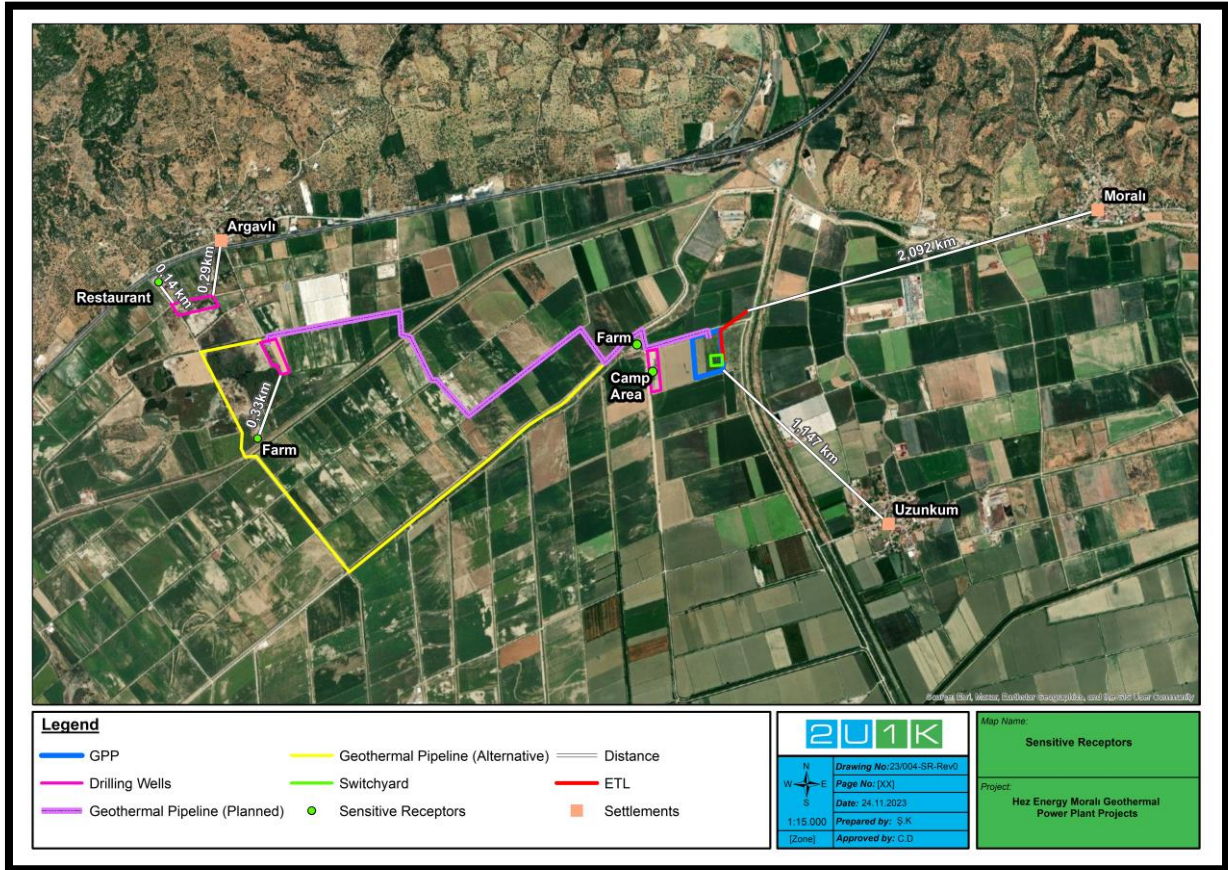


Figure 2-2. Nearby neighborhoods and sensitive receptors in the vicinity of the Project area

To explain the Primary Social Area in more detail: The D525 road (Izmir-Söke Road) passes between the drilling and the nearest settlements (within the borders of Argavlı Neighborhood). One side of this road where the facilities to be built for the project are located is empty land. On the other side of the road there are a market and a small business. Although there are mostly agricultural lands around the solar power plant to be established, Beştepeler Kubilay GPP is located approximately one (1) km away.

As the Secondary Social Area of Influence, an area of approximately five (5) km on the D525 road where businesses and sensitive receptors can be found was identified. Sazlı Neighborhood (Söke) and Gümüşköy Neighborhood (Germencik) are located within this area. Description of potential impacts of Primary Social Area of Influence and Secondary Social Area of Influence presented in Table 2-2.

Table 2-2. Social Area of Influence

Primary Social Area of Influence-Settlements			
Province	District	Neighborhoods	Description of Potential Impacts
Aydın	Germencik	• Moralı	impacts caused by dust, noise and vibration; impacts by conflicts caused by labor influx; impacts of acquisition of farmland; impacts of traffic; impacts of life and fire risks; impacts of employment opportunities and local procurement are expected.
		• Uzunkum	impacts by conflicts caused by labor influx; impacts of acquisition of farmland; impacts of traffic; impacts of employment opportunities and local procurement are expected.
	Söke	• Argavlı	Argavlı is the closest settlement to the Project site During construction period. impacts of traffic is expected.
Primary Social Area of Influence-Businesses			
Businesses			Description of Potential Impacts
Dural Market			It is expected that the business potential will increase due to the Project related activities.
Gurbetçinin Yeri Restaurant/Argavlı			
Çöpşiş Restaurants (Meşhur Ortaklar, Acar, Barış Çöpşiş) ¹			
Primary Social Area of Influence-Facilities			
Facilities			Description of Potential Impacts
Beştepelers Kubılay GPP			Traffic, pressure on infrastructure, labor influx, risk of fire can affect facilities.
Ege Mantar (Fungiculture Center)			
Primary Social Area of Influence-Workers			
Project Workers (including third party workers)			Potential risks related to labour and working conditions, etc.

¹ Çöpşiş Restaurants: A local dish of the region where meatballs threaded on sticks are cooked on wood fire. There are several Çöpşiş restaurants along the D525 road (Izmir-Söke Road).

Sensitive Receptors		
2 Farm Owners		Dust or noise emissions can affect animals.
Yörük Ali Baba Restaurant		Dust or noise emissions can affect the business.
Secondary Social Area of Influence		
Province	District	Neighborhoods
Aydın	• Germencik	• Gümüşkøy
	• Söke	• Sazlı
Secondary Social Area of Influence-Businesses		
Businesses		Description of Potential Impacts
Ozce Petrol Station		It is expected that the business potential will increase due to the Project related activities.
Amour De luxe Restaurant		
Primary Social Area of Influence-Facilities		
Facilities		Description of Potential Impacts
Gönülşen Farm		Traffic, pressure on infrastructure, labor influx, risk of fire can affect facilities.

2.2 Roles and Responsibilities

All environmental and social commitments described in ESIA and SEP will be fulfilled by the Project Company. The Project Company will ensure that all affected parties, especially affected settlements, local community, adjacent facilities, and public bodies in the vicinity are kept informed of the Facility. These groups will be involved in the process of identifying key issues under the Facility. The general organizational structure for implementation of ESMP and SEP is presented in Table 2-3.

Table 2-3. General Organizational Structure for Implementation of ESMP

Roles	Responsibilities
Project Company	<ul style="list-style-type: none"> • Overall responsibility for the implementation, • Ensure that the Facility complies with the provisions of International Finance Institutions described in ESIA, • Ensure that ESIA provisions are implemented to mitigate social impacts, • Undertake monitor of the implementation of the ESIA, and prepare quarterly or semi-annual environmental and social monitoring reports for submission to the lenders.
Stakeholder Engagement Plan Manager	<ul style="list-style-type: none"> • Ensures that this SEP is implemented • Provides necessary resources for effective implementation of this Plan • Coordinates with parties for effective implementation of this Plan
Contractor	<ul style="list-style-type: none"> • The construction works under the contract packages included in the scope of the ESIA will be carried out by contractors. • Contractors will be responsible for observing the liabilities provided in the ESIA. Issues related to the implementation of the ESIA will be examined by the contractor during the preparation of the bid, and proposals will be submitted considering the ESIA prepared by the Contracting Authority. • The ESIA includes the monitoring tables that describe the possible negative effects of the operations to be carried out during the construction phase of the project and the measures to be taken to minimize these effects and the conditions for putting these measures into action. Additionally, the said tables include the entities and organizations (project stakeholders) responsible for the aforementioned items. • During the construction phase, the contractor will provide training to the personnel who will take part in the project, including the measures within the scope of ESMP, to raise awareness of environmental, occupational and worker health and safety, public health and safety and social issues. • As part of ESIA, implementation of the measures identified for the construction phase will be coordinated by Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and OHS Expert) who will be involved in the Project Organizational Chart. The said experts will be responsible for taking actions required to eliminate/minimize environmental and social impacts/risks in line with ESIA and for putting monitoring plans into practice. • In case of contingencies such as environmental, social and labour issues or accident or loss of time, the contractor will immediately inform the Project company and the Project company will inform TSKB and the WB within three (3) business days. A report on the root causes of the incident and the corrective actions to be taken will be submitted to TSKB and the WB within thirty (30) days.
GRM Manager/CLO	<ul style="list-style-type: none"> • Establish and implement the grievance mechanism system, ensuring it aligns with project guidelines and best practices.

Roles	Responsibilities
	<ul style="list-style-type: none"> • Facilitate effective communication channels for stakeholders to express grievances, providing clear information on the mechanism's existence and procedures. • Maintain comprehensive records of grievances, including details of the concerned parties, the nature of the grievances, and steps taken for resolution. • Conduct impartial and thorough investigations into grievances, collaborating with relevant project teams and stakeholders to gather information and assess the validity of concerns. • Develop and recommend appropriate solutions or actions to address grievances, aiming for fair and satisfactory resolutions. • Prepare regular reports on the status of grievances, outlining trends, outcomes, and any recommended improvements to the grievance mechanism. • Provide training to project staff and stakeholders on the grievance mechanism, ensuring awareness and understanding of the process. • Continuously evaluate and refine the grievance mechanism based on feedback and lessons learned, promoting an environment of continuous improvement. • Ensure that the grievance mechanism aligns with legal and regulatory requirements, as well as industry standards and the project's policies. • Engage with various stakeholders, including local communities, government bodies, and project partners, to foster positive relationships and address concerns proactively.
<i>Environmental Expert and Occupational Health and Safety Expert</i>	<ul style="list-style-type: none"> • Oversee and monitor adherence to, and implementation of the ESIA ensure that an environmental management system is set up and functions properly, • Ensure that the facility specifications adequately reflect the recommendations of the ESIA, • Visit and inspect facility area regularly, to ascertain the level of compliance of works and report back environmental issues, • Prepare quarterly or semi-annual environmental and social monitoring reports for submission to the Lenders, • Regularly report to the management of the Project Company regarding all environmental and social requirements during construction and operation.
<i>Project Employees</i>	<ul style="list-style-type: none"> • Attend induction training that is provided to introduce the environmental duties under the ESIA and SEP.

3 REGULATORY REQUIREMENTS

This section will provide a framework for the parts of the Project's stakeholder engagement activities related to Turkish legislation, IFC Performance Standards and World Bank Environmental and Social Standards.

3.1 National Legislation

The Environmental Law No. 2872, which was published in the Turkish Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 May 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Türkiye and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

Within the scope of EIA, for the projects included in the Annex-I list, a public participation meeting (PPM) will be organized by the bodies and organizations authorized by the Ministry with the participation of the project company on the date set by the Ministry and at the place and time determined by the Governor's Office before the Committee determines the scope to inform the public about the investment and to hear their opinions and suggestions regarding the project.

Specific Objectives of PPM according to regulation is presented in Table 3-1.

Table 3-1. Specific Objectives of PPM

1)	In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project companies as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.
a)	The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through in a local periodical published in the region where the project will be realized and in widely published newspaper at least ten (10) calendar days before the determined date for the PPM.
b)	Public Participation meeting will be held under the Director of Provincial Directorate of Environment, Urbanization and Climate Change or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.
2)	Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.
3)	Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.
4)	The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.

Environmental Impact Assessment (EIA) encompasses the identification of potential positive and negative effects of the planned projects on the environment, the measures to be taken to avoid adverse effects or minimize them to a degree not harmful to the environment, the determination and assessment of the selected location and technology alternatives, and the efforts to be maintained for the monitoring and control of the implementation of projects. The

project has been evaluated within this scope, and the activities of the Project are not included in Annex-1 and Annex-2 according to Turkish repealed EIA Regulation (Official Gazette dated 25.11.2014 and numbered 29186), therefore the Project is considered out of scope.

Apart from environmental laws, the Project Company is also obliged to follow the following laws:

- Labour Law No. 4857, Official Gazette No. 25134 dated 10 June 2003
- Law on Right of Petition No. 3071, Official Gazette No. 18571 dated 10 November 1984
- Law on the Right to Obtain Information No. 4982, Official Gazette No. 25269 dated 24 October 1984
- Law on Protection of Personal Data No. 6698, Official Gazette No. 29677 dated 07 April 2016.

3.2 IFC Performance Standards (2012)

For social aspects of the project, the Project Company will rely on some core documents included in the World Bank Group's Principles and Guidelines. One of the primary references is the International Finance Cooperation's Sustainability Framework, Performance Standards and Guidelines (2012).

In the whole process until the completion of the investment's life, there are 8 Performance Standards (PS) developed by IFC, which need to be complied with by the investor. The investor will manage environmental and social risks and impacts to contribute to the development of the project. The PSs that need to be complied with regarding the existing project are given below:

PS 1: Assessment and Management of Environmental and Social Risks and Impacts

PS 2: Labor and Working Conditions

PS 3: Resource Efficiency and Pollution Prevention

PS 4: Community Health, Safety and Security

PS 5: Land Acquisition and Involuntary Resettlement

PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS 8: Cultural Heritage

IFC expects its investors to define their own stakeholders and remain in constant communication with them. Additionally, IFC requires investors to communicate with the potentially affected communities by constantly sharing information with and consulting them and by adopting an approach that will inform them, so that the project impacts are consistent with the requirements set out by the Bank.

Performance Standard (PS) 1: It defines the requirements related to identification of the stakeholders potentially affected by the Bank's project, sharing of adequate information about the impact and problems of the project and consultation with all stakeholders in a meaningful and culturally appropriate way through Assessment and Management of Environmental and Social Risks and Impacts.

According to PS 1, IFC defined the Stakeholder Engagement as a process that continues in all phases of the project, starting from the initial planning stage of the project.

For the Affected Communities, it is also required to establish a grievance redress mechanism to learn about their concerns and grievances about the Project and to help eliminate such concerns and grievances.

The requirements identified with respect to the stakeholder engagement are provided below:

- The stakeholder engagement should be free from abuse, intervention, threat or oppression; it should be relevant, understandable and accessible at the right time, using a culturally appropriate method.
- In the stakeholder engagement process, all people and/or groups who may directly or indirectly be affected by or interested in the project will be identified. First, it is required to inform the public. The investor will establish how stakeholders will be affected as well as the scope of such effects. An adequate level of information will be incorporated into stakeholder identification and analysis. This will consequently enable the Bank to determine the level of communication established by the investor with its stakeholders.
- The investor will inform the Bank on how to communicate with its stakeholders. This process will continue from the project preparation phase until the operational phase and will include grievance redress procedures. In addition, the investor will keep IFC informed about the information and communication activities carried out by the investor before applying to the Bank.

In Good Practice Handbook, IFC defined the basic concepts and principles of stakeholder engagement:

- Stakeholder identification and analysis;
- Information disclosure;
- Stakeholder consultancy;
- Consultation and engagement;
- Grievance handling;
- Stakeholder engagement for project monitoring;
- Reporting to stakeholders.

IFC requires the investor to develop an effective grievance redress mechanism where stakeholders will communicate their grievances and concerns and all grievances and concerns will be addressed and resolved effectively. All Stakeholder Engagement processes set out by

IFC within the scope of the project that is being undertaken by the Project Company will be fulfilled in accordance with PS 1.

3.3 World Bank (WB) Safeguard Policies

The main objectives and tasks of the Project-related WB Safeguard Policies are explained below:

OP 4.01 Environmental Assessment

- To ensure the proposed projects' environmental and social sustainability and soundness
- To inform decision-makers about the environmental and social risks
- To increase transparency by providing stakeholder engagement in the decision-making process
- WB conducts an environmental scanning and classifies the proposed projects under Categories A, B and C, based on the level of their likely environmental impacts. Furthermore, Category B projects divide in two within its structure as B and B+, based on the special circumstances of the project in question.

OP 4.04 Natural Habitats

- To conserve natural habitats and their biodiversity
- To avoid significant conversion/degradation of critical natural habitats
- To ensure the sustainability of services and products provided to human society by natural habitats

OP 4.11 Physical Cultural Resources

- To ensure the identification and protection of Physical Cultural Resources (PCR), including archaeological and historical sites, historic urban areas, sacred sites, graveyards, burial sites and unique natural values
- To ensure the compliance with national legislation regarding the protection of physical cultural property

OP 4.12 Involuntary Resettlement

- To avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs;
- To assist displaced person in improving their former living standards; it encourages community participation in planning and implementing resettlement;
- To provide assistance to affected people, regardless of the legality of title of land.

4 PREVIOUS STAKEHOLDER CONSULTATION

Two field visits (February 13-14, 2023 and May 23-25, 2023) were conducted within the scope of the project. During these two field visits, two farm owners, one restaurant owner and the headmen of the neighborhoods covered by the AoI were interviewed. The following topics were selected to discuss the socio-economic indicators of the settlements around the project area:

- Demography and Population,
- Livelihoods and Employment,
- Education,
- Health,
- Vulnerable Groups,
- Infrastructure and Services,
- Land Acquisition,
- Cultural Heritage,
- Traffic and Transportation,
- Level of Information about the Project.

During the first field visit, interviews were conducted with the project company, project staff and neighborhood mukhtars within the scope of the project. In addition, a sensitive receptor interview was conducted with the farm owner 0,04 km from the EIA 1 site. Interviews were conducted with the headmen of three neighborhoods—Moralı, Argavlı, and Uzunkum—on the same date.

The headman of Moralı highlighted challenges faced by citizens in livestock and agriculture, including issues related to land division and damages caused by wild boars, which could have significant socio-economic impacts. Argavlı, in contrast, reported no economic or social problems and expressed confidence that the project's distance would have no negative impact on their neighborhood. Uzunkum's headman raised concerns about water quality, attributing issues to arsenic in well water from geothermal plants in the region. There is a strong call for the proposed geothermal power plant to have a reinjection system to prevent detrimental consequences on crops and water resources. Interviews indicated headmen's awareness of technical aspects, likely influenced by existing geothermal plants, and shared concerns about past problems recurring. Household surveys revealed limited awareness of the project, with those informed expressing insufficient knowledge. Apart from this, based on the unstructured interview that held with farm owner, the project company addressed their electricity connectivity issues.

In the second field visit, household surveys were conducted in Moralı, Argavlı and Uzunkum Neighborhoods within the project area. The survey was conducted with 25 people in Moralı Neighborhood, 14 people in Argavlı Neighborhood and 12 people in Uzunkum Neighborhood. In addition, key informant interviews were conducted with Aydın Provincial Directorate of Forestry, Germencik District Food, Agriculture and Livestock Directorate, Germencik District Health Directorate and Germencik Municipality. In addition, as part of the sensitive receptor

interviews, the owner of a restaurant located 0,14 km from the EIA-2 area and the owner of a farm located 0,11 km from the EIA-2 area were interviewed. The restaurant owner expressed a need for more comprehensive information about the construction timeline of the project, citing concerns about dust release during construction and potential damage to the road from heavy vehicles passing by. The wife of the farm owner, engaged in ovine and poultry farming, lacked information about the project but mentioned power cuts as their major issue. The Aldo Solar Panel near the farm didn't cause problems, but dust issues arose from existing roads around the house.

In summary, the assessment focused on the immediate vicinity of the project, particularly two farms and a restaurant, highlighting concerns about air emissions, dust, and road damage during the construction phase.

5 PROJECT STAKEHOLDERS

A stakeholder is defined as any individual, organization or group which is potentially affected by the Project or which has an interest in the Project and its impacts/risks. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“project affected parties”) or have an interest in the Project (“other interested parties”).

It is important that particular effort is made to identify any disadvantaged and vulnerable individuals/groups, who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update. The Stakeholder Engagement Plan has been prepared for this project to identify project stakeholders and establish engagement methods for the future of the Project.

Stakeholder identification has been an on-going process and different issues are likely to concern different stakeholders. Therefore, stakeholders have been grouped based on their connections to the Project. Understanding the connections of a stakeholder group to the Project helps identify the key objectives of engagement. Table 5-1 presents the interested and affected stakeholders, Table 5-2 presents stakeholders needs within the scope of the Project.

Table 5-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	Impact/Interest Reason	Impact/ Interest Level
Internal Stakeholders			
<ul style="list-style-type: none"> Project Company 	Project-affected party	Project Development, Implementation and Employment	High
<ul style="list-style-type: none"> Project Workers (including contractor workers) 	Project-affected party	Employees who will ensure the realization of the Project during construction	High
Government / Authorities			
<ul style="list-style-type: none"> Aydın City Health Authority Aydın Provincial Directorate of Family and Social Services Aydın Provincial Directorate of Environment, Urbanization and Climate Change Aydın Metropolitan Municipality Germencik Municipality Aydın Provincial Directorate of Agriculture and Forestry Germencik District Directorate of Agriculture and Livestock Germencik District Health Directorate 	Project-interested party	Local government authorities responsible for health, environment, social services in Aydın province	Medium

Stakeholder Groups	Stakeholder Type	Impact/Interest Reason	Impact/ Interest Level
Sensitive Receptors			
<ul style="list-style-type: none"> • Yörük Ali Baba Restaurant • 2 Farms 	Project-affected party	Affected by dust, noise and traffic intensity during the construction and operation phases of the project	High
Neighbourhood			
<ul style="list-style-type: none"> • Moralı Neighbourhood • Argavlı Neighbourhood • Uzunkum Neighborhood 	Project-affected party	Commissioning, Potential noise and dust emission during the construction phase	High
Landowners			
<ul style="list-style-type: none"> • Neighboring land owners in the geothermal pipeline • 2 shareholders through whom the electricity transmission line passes 	Project-affected party	Being affected in case of any land acquisition	High
Local and National Media			
<ul style="list-style-type: none"> • Local and National Media 	Project-interested	Delivering news at local and national level	High
Vulnerable/Disadvantaged Groups			
<ul style="list-style-type: none"> • Seasonal workers • Low income group • Female household head • Mentally and/or physically handicapped • People who are aged 70 and living alone 	Project-affected party	Commissioning, Potential noise and dust emission during the construction phase, project design to consider the special needs of vulnerable groups	High
Associations / Non-Governmental Organizations			
<ul style="list-style-type: none"> • National and international non-governmental organizations 	Project-affected party	Non-governmental organizations working on environmental protection	High

Table 5-2. Project Stakeholder Needs

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Morali, Argavlı and Uzunkum Neighbourhoods	<ul style="list-style-type: none"> Project affected settlements 	Being within the impact area of the project	Turkish	Written information, phone, face to face	Be aware of project phases. To be informed about the plans and activities within the scope of the project
Sensitive Receptors	Two (2) farms and one restaurant	Being affected by the activities during the construction and operation periods of the project	Turkish	Written information, phone, face to face	Be aware of project phases
Neighboring land owners in the geothermal pipeline 2 shareholders through whom the electricity transmission line passes	Landowners	Being economically affected in case of any land acquisition	Turkish	Written information, phone, face to face	Establishing transparent communication when it comes to any land acquisition
Vulnerable/ Disadvantaged Groups	Seasonal workers Low income group Female household head Mentally and/or physically handicapped <ul style="list-style-type: none"> People who are aged 65 and living alone 	Individuals with the potential to be more affected by project work	Turkish	Written information, phone, face to face	Be aware of project phases,
Associations / Non-Governmental Organizations	National and international non-governmental organizations	Non-governmental organizations working on environmental protection	Turkish	Written information, phone, face to face	Be aware of project phases,

6 STAKEHOLDER ENGAGEMENT PROGRAM and TOOLS

A range of tools will be used for stakeholder engagement within the scope of this Project. Stakeholder engagement will continue using these already established communication mechanisms, with new mechanisms employed as required to ensure efficient and effective engagement throughout the life of the Project. The Project has and will continue to use the following methods for engaging with stakeholders:

- Informal/formal face-to-face or online meetings with affected communities and other stakeholders –can be the main form of consultation throughout the lifetime of the Project. Stakeholders will be informed about these consultation meetings by telephone, brochures, posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties ten (10) days in advance.
- Project Company website – a publicly available site for project announcements, documents, reports, etc. The SEP documents prepared for the Project will be published in English and Turkish via the Project website. Information on the application of the grievance redress mechanism created by the Project Company will be also announced in the website together with the contact details of the GRM responsible person. At the same time, all up-to-date information about the Project will be made available to the public via the website.
- Written materials – Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the Project. – Materials will provide information about the Project and inform Stakeholders about all communication methods and stakeholder engagement tools created for the Project.
- Grievance Redress Mechanism – aimed particularly at directly affected stakeholders. The mechanism has been and will continue to be widely disclosed to the affected public.
- Media advertisements – invitations to participate in meetings, information disclosure, etc.

6.1 Future Stakeholder Engagement

Stakeholder engagement will continue throughout Project's lifespan. Key stakeholders will be kept informed about the progress of the Project, have the opportunity to provide feedback on the effectiveness of mitigation and enhancement measures, and to raise any concerns or grievances.

Information to be shared with the implementation of this Report will include (but is not limited to) the following:

- the impacts that have been identified as a result of the Project,
- the impacts and mitigation or enhancement measures that are being implemented,
- roles and responsibilities,

- monitoring and management measures, and
- information on the grievance redress mechanism for the Project.

The Project Company will engage with the affected stakeholders and other interested parties as structured by this Plan.

The level of engagement and measures taken to prevent lack of information / misleading information will be closely followed during the monitoring phase of the Project.

The Project Manager will be responsible for engagement with stakeholders as an on-going process throughout the life of the Project.

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders.

With the implementation of this Report, the formal grievance redress mechanism will be established for internal/external stakeholders at no cost and will not impede access to other judicial or administrative remedies.

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as Project Company's website, letters, and face to face meetings with the implementation of the Stakeholder Engagement Plan.

Grievance procedures will be coordinated through the Project Manager, which is the primary interface between the community and the Project Company. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

6.2 Stakeholder Consultation Meeting

According to analyses of social experts, it has been determined that the residents living in Argavlı, Uzunkum and Moralı Neighbourhoods will be affected by the Project. In accordance with Article 9 of the EIA Regulation dated 25.11.2014 and numbered 29186 regarding the project within the 3 EIA areas subject to the EIA Application File, a Public Participation Meeting was held at 14.00 on 24.01.2022 at the address of Uzunkum Mahallesi, Uzunkum Street, Muhtarlık Binası, Germencik/Aydın, determined by the Ministry of Environment, Urbanisation and Climate Change, to inform the public about the project and to receive their opinions and suggestions regarding the Project.

The date, time and place of the meeting were announced 10 days before the date of the meeting in 2 separate local and national newspapers. Announcements regarding the meeting were made by the mukhtars' offices and announcement texts were posted on the notice boards, announcement texts were announced on the notice boards of Germencik District Governorship. Public participation within the scope of the process, brochures containing information about the project were distributed.

The meeting was attended by:

- Aydın Governorship authorities'
- Representative of the Ministry of Environment, Urbanization and Climate Change,
- Germencik mayor's office,
- Representatives of political parties,
- Citizens who are members of non-governmental organizations such as AYÇEP, Germencik Environment and Nature Association, Aydın Environment and Culture Association,
- Members of the local press,
- Local people and citizens from surrounding neighbourhoods (Argavlı, Moralı, Mursallı, Hıdırbeyli) and districts,
- Lawyers from the Aydın Bar Association,
- Çevtaş Research Technology Mining Engineering Consultancy Landscaping Training Consultancy Contracting Tic. Ltd. Sti. representatives,
- Project company representative

Representatives of Project Company made a presentation on the Project. The presentation provided detailed information on the Project location, scope of activities, social and environmental impacts and mitigation measures, reasons for needing the project, the legislative framework with which the project will comply, possible environmental impacts during the construction and operation phase, contact information for suggestions and opinions of the participants. During the meeting, participants' questions and comments about the Project were received and addressed by also referring to the relevant sections in the EIA report.

7 GRIEVANCE REDRESS MECHANISM

The purpose of the Grievance Redress Mechanism (GRM) is foremost to give access to a problem-solving procedure to Project affected people including affected communities and project workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Project worker's, local communities, and other stakeholders.

The structured GRM will ensure that grievances associated with the Project are addressed through a transparent and impartial process. From the early stages of the Project lifecycle, the grievance procedure has been and will continue to be disclosed to the public through individual or group meetings, printed materials, notice boards.

The grievances will be acknowledged by the GRM officer or CLO assigned by the Project Company and timeframe for the provision of response or for further consideration will mainly depend on the complexity of the issue raised, however, ideally, it is expected to not exceed 14 days after receiving the grievance.

The methods used to publicize the availability of the grievance redress mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Project's lifespan.

All stakeholders initiating a grievance will have an opportunity to claim their case in a confidential manner. The Project Company will ensure that the name and contact details of the complainant are not disclosed without their consent.

In case a sensitive complaint is received by the Contractor they will be responsible for conveying the issue directly to the Project Company GRM focal point. The Project Company is also responsible for forwarding sensitive complaints to the bank immediately.

The GRM official who will manage the Grievance Redress Mechanism will be knowledgeable about the guidelines prepared by the World Bank to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in a culture of silence due to negative reactions from the community. For the avoidance of this, it is highly important that the stakeholders raise the grievances involving these issues about the Project anonymously. Employee contracts will encourage employees to use the grievance mechanism. It will also be clearly stated in employee contracts that any grievance raised will not result in retaliation, such as dismissal or punishment. Thus, employees will be protected by their contract with the project company when submitting their grievances

The Contractor and Project Company should receive training in the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

If stakeholders are fail to reach a satisfactory solution through the channels provided above, they will be able to reach the Presidency's Communication Centre (CİMER), the Foreigners Communication Center (YİMER) and the relevant legal institutions.

Presidency's Communication Center (CİMER):

- CİMER Website (www.cimer.gov.tr)
- CİMER Call Center (150)
- CİMER Phone Number: +90 312 525 55 55 - Fax Number: +90 312 473 64 94
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates

Foreigners Communication Center: The Foreigners Communication Center (YİMER) has been providing a centralized complaint system for foreigners:

- YİMER Website (www.yimer.gov.tr)
- YİMER Call Center (157)
- YİMER Phone Number: +90 312 5157 11 22 - Fax Number: +90 312 920 06 09
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the Republic of Türkiye General Directorate of Migration Management

Applicants whose complaints could not be resolved through existing grievance redress mechanism or whose complaints contain sensitive issues can always apply to the relevant legal institutions. Relevant Institutions can be summarized as, but not limited to, as follows.

- Civil Courts of First Instance,
- Administrative Court,
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

In case a sensitive complaint ((Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV)) is received by the Contractor they will be responsible for

conveying the issue directly to the Project Company GRM focal point. The Project Company is also responsible for forwarding sensitive complaints to the bank immediately.

The Project Company will provide training on SEA/SH and GBV cases and prevention methods to both its own staff and contractor personnel (including the Management Unit).

Samples of consultation form, public and workers grievance forms and grievance closure form prepared for use within the scope of the Project are given in Appendix-A, Appendix-B, Appendix-C and Appendix-D, respectively.

7.1 Grievance Log

All incoming grievances will be reflected in a Grievance Log to assign an individual reference number. Verbal complaints will also be recorded in the grievance log (Appendix-E) by the GRM officer.

The Grievance Log will also be used to track the status of a grievance, analyses the frequency of complaints arising, typical sources and causes of complaints, as well as to identify prevailing topics and any recurrent trends.

All complaints will be recorded in the respective Grievance Log with the following information:

- Grievance reference number,
- Date of the grievance,
- Location where the grievance was received and in what form (for grievance boxes),
- Complainant's contact details (in case of non-anonymous grievances)
- Content of the grievance,
- Parties responsible for the addressing the issue,
- Dates when the investigation of the grievances initiated and completed,
- Results of the investigation,
- Information on the proposed corrective actions to be sent to complainant (in case of non-anonymous) and the date of the sent,
- Deadlines for required actions by the Project staff,
- Indication on whether the corrective action was satisfactory or a reason for non-resolution of the grievance,
- The of the close-out, and;
- Any outstanding actions for non-closed grievance cases.

7.2 Public Grievance Redress Mechanism

Complaints should be reviewed as soon as possible in order to prioritize for resolution. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, an urgent safety issue or where it concerns the livelihood of locals.

There are 10 steps that complete the grievance redress mechanism. This process has been detailed in the text below.

Step 1: Identification of grievance through personal communication with appropriately trained and advertised by GRM Officer.

This could be in person, by phone, letter, grievance boxes or email.

Step 2: Grievance is recorded in the 'Grievance Log' (paper and electronic) within one day of identification. The grievance log will managed by the assigned GRM Officer. The significance of the grievance will then be assessed within five to seven days.

Significance Criteria is outlined in the list below–.

Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc.).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

In the case the complaint is assessed to be out of the scope of the Grievance Redress Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

Step 3: Grievance is acknowledged through a personal meeting, phone call, grievance boxes or letter as appropriate, within a target of 14 working days after submission (except the complaints that require immediate attention). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

Step 4: The GRM Officer is notified of Level 1, 2 or 3 grievances the Project Company is notified of all Level 3 grievances. The senior management of Project Company, as appropriate, supports the Project Manager in deciding who should deal with the grievance, and determines whether additional support for the response is necessary.

Step 5: The GRM Officer delegates the grievance within five to seven days via e-mail to relevant department(s)/personnel to ensure an effective response is developed (e.g., human resource, relevant administrative departments etc.)

Step 6: A response is developed by the delegated team within 14 days in which may include GRM Officer with input from senior management of related departments as necessary. The response should identify a suitable resolution to the grievance, in which could involve further information to clarify a situation, taking measures to mitigate problems or compensate for any damages that has been caused during the Project activities though financial compensation.

Step 7: The response is signed-off by the senior manager of related departments for level 3 grievances and the GRM Officer for Level 2 and Level 1 grievances within 14 days. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the GRM Officer and referred to in the grievance log.

Step 8: Communication of the response should be carefully coordinated. The GRM Officer ensures that an approach to communicating the response is agreed and implemented.

Step 9: Record the response of the complainant to help assess whether the grievance is closed or whether further action is needed. The GRM Officer should use appropriate communication channels, most likely telephone or a face to face meetings, to confirm whether the complainant has understood and is satisfied with the response.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located around the Facility as well as within the Project affected villages and GRM Officer should contact the head of villages on the anonymous grievances and resolutions as well.

If possible, the complainant's response should be recorded in the Grievance Log including notes on the mitigation measures to prevent recurrence of the grievance in future.

In case the GRM Officer or other managerial department are not able to address the particular issue raised through the grievance redress mechanism GRM Officer will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

Step 10: Close the grievance with a sign-off from the GRM Officer. The GRM Officer assesses whether a grievance can be closed or whether further attention is required. If further attention is required, the GRM Officer should return to Step 2 to re-assess the grievance. Once the GRM Officer has assessed whether the grievance can be closed, he/she will sign off or seek

agreement from the related management departments for level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which will be filed by the GRM Officer and referred to in the grievance log.

7.3 Worker Grievance Redress Mechanism

Worker Grievance Redress Mechanism is defined as complaints from Project employees (including both direct and indirect employees).

This mechanism is structured with an intention of it being an effective approach for early identification, assessment and resolution of grievances throughout the Project's lifespan. The Grievance Redress Mechanism (GRM) should guarantee that any employee raising a complaint will not be subject to any reprisal.

The scope of the Worker GRM can be summarized as but not limited to; any worker with a concern of pertaining to onsite work such as occupational health and safety, terms of employment, wages, issues with the local community or among co-workers, hygiene issues in the common areas, insufficient amount of food and / or concerns regarding the security of the workers.

The GRM will be informed to all Project workers through written and verbal communications. Each worker should be informed about the grievance redress mechanism at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is quite significant to some workers; therefore, workers can submit their complaint and remain anonymous. However, grievances lodged anonymously may prevent the GRM Officer of the Project Company from resolving the matter and providing feedback. Nevertheless, Project workers wishing to lodge grievances anonymously should be allowed to do so. The Project Manager will open the complaint boxes located within the Facility every 5 days and will assess to determine whether the issue raised by the complaint fall within the scope of Worker GRM or not. Employee contracts is encourage employees to use the grievance mechanism. It is also be clearly stated in employee contracts that any grievance raised is not result in retaliation, such as dismissal or punishment. Thus, employees are protected by their contract with the project company when submitting their grievances. Additionally, the Grievance Redressal Mechanism (GRM) ensures that any employee who raises a complaint will not face any retaliation.

It is important to note that, Project employees will retain their right to access the public grievance redress mechanism for non-employment-related issues.

Complaints should be reviewed as soon as possible in order to prioritize for resolution. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, where it concerns the livelihood of workers.

There are 5 steps that complete the Worker GRM. This process has been detailed in the text below.

Step 1: Identification of grievance will be done through personal communication with the GRM Officer. This could be in person , by phone, letter, grievance boxes or email.

Step 2: Grievance is recorded in the 'Grievance Log'. Once the grievance is received and recorded, based on the subject and issue, the GRM Officer shall identify the department, management or personnel responsible for resolving the grievance.

In the case the complaint is assessed to be out of the scope of the Project's Grievance Redress Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

Step 3: Grievance Investigation. The GRM Officer and related departments should then assess into the facts relating to the grievance. This should be aimed at establishing and analysing the cause of the grievance and identifying suitable mitigation measures. The analysis of the cause will involve assessing various aspects of the grievance such as the past history of the employee, frequency of the complaint occurrence, management practices, recent incidents, etc.

During the cases when needed, for the sake of the investigation, the GRM Officer may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. In case of Site visit is required to gain first-hand understanding of the nature of the complaint, the visit will be also made to verify the validity and severity of the grievance.

The concern will be referred to the related managerial department who will discuss the concern with the employee and Area and/or Departmental Manager.

The investigation phase should be completed in no more than 5 working days of receiving the grievance.

Step 4: A Resolution and closure is developed based on the understanding that the GRM Officer is developed in consultation with the related departments or management. The suitable resolution for the complaint should be accordingly communicated to the grievant within the 2 working days of the completing the grievance investigation phase.

In case the issue is beyond the scope of the GRM Officer, the grievance should be escalated to the Project Management Unit to endeavour to resolve the grievances through managerial levels within the 7 working days of the escalation.

Step 5: Close the grievance with a sign-off from the GRM Officer once the grievance is resolved and the same has been communicated to the grievant. As the Grievance Log will be updated, the current status of the grievance and understanding of the manner on how the grievance was resolved should also be reported in the Grievance Log. The intention of

providing further information on the grievance log is to serve as a reference for any similar grievances that may arise in the future.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located within the GRM Officer and common areas and should be announced through tool-box or weekly meetings.

8 MONITORING AND REPORTING

The Project will implement the monitoring measures throughout the lifecycle of the Project. The Stakeholder Engagement Plan will be reviewed annually and updated if required according to the Project developments and the unexpected public reactions. The grievance redress mechanism established for the Project will be used effectively and the statistical summary of the outputs of the grievance redress mechanism will be reported to the Project Company and lenders. Thus, the topics that the complaints are concentrated, the number of complaints, solutions and timing will be tracked through the database and the Grievance Register provided in Appendix-E.

The key performance indicators during the implementation of the Stakeholder Engagement Plan is provided in Table 8-1.

Table 8-1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

No	KPI	Target	Monitoring Method
1	Responding to grievances from workers or public stakeholders	It should be targeted to respond to all grievances (even if they are not relevant).	Grievance log form
2	Number of grievances responded to within targeted time frame	Target of 90%	Grievance log form
3	Communicating the grievance redress mechanism to stakeholders	Actions taken to promote the Grievance Redress Procedure	Reporting
4	Stakeholder engagement process performance	Recording all formal and informal actions taken with respect to the project stakeholders	Reporting
5	Success of the actions taken against grievances	Elimination or reduction of grievances on similar issues	Reporting

APPENDIX - A SAMPLE CONSULTATION FORM

Form Completed by:		Date and Time:		
Subject of Meeting:		Meeting Record No:		
1. MEETING DETAILS				
Interviewed Entity:		Mode of Communication <input type="checkbox"/>		
Name-Last Name of the Interviewee:		Telephone <input type="checkbox"/>		
Telephone:		Face-to-Face Meeting <input type="checkbox"/>		
Address:		Website / E-mail <input type="checkbox"/>		
E-mail:		Other (Describe)		
Type of Stakeholder				
Governmental Body <input type="checkbox"/>	Local Community <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
University <input type="checkbox"/>	Union of Industries <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	Other (.....) <input type="checkbox"/>
2. MEETING DETAILS				
Project-related questions:				
Project-related concerns/feedback:				
Responses to the views provided above:				

APPENDIX - B PUBLIC STAKEHOLDER SAMPLE GRIEVANCE FORM

Reference Number:			
Form Completed by:	Date and Time:		
Subject of Meeting:	PROJECT NO: 23 /004		
1. PARTICULARS OF THE COMPLAINANT			
Name-Last Name:	Grievance Communicated by:		
TR ID No:	Telephone / Toll Free Number <input type="checkbox"/>		
Telephone:	Face-to-Face Meeting <input type="checkbox"/>		
Address:	Website / E-mail <input type="checkbox"/>		
E-mail:	Other (Describe) <input type="checkbox"/>		
Type of Grievance			
Abandonment <input type="checkbox"/>	Infrastructure <input type="checkbox"/>	Environmental Problems <input type="checkbox"/>	Traffic, transport, etc. <input type="checkbox"/>
Assets/Properties affected by the project <input type="checkbox"/>	Loss of Income <input type="checkbox"/>	Employment <input type="checkbox"/>	Other: <input type="checkbox"/>
2. DETAILED INFORMATION ON THE GRIEVANCE			
Description of the grievance:			
Solution method requested by the complainant			

Recorded by
Name-Last Name/Signature

Complainant
Name-Last Name/Signature

APPENDIX - C WORKERS SAMPLE GRIEVANCE FORM

Reference Number:			
Form Completed by:	Date and Time:		
Subject of Meeting:	PROJECT NO: 23 /004		
3. PARTICULARS OF THE COMPLAINANT			
Name-Last Name:	Grievance Communicated by:		
TR ID No:	Telephone / Toll Free Number <input type="checkbox"/>		
Telephone:	Face-to-Face Meeting <input type="checkbox"/>		
Address:	Website / E-mail <input type="checkbox"/>		
E-mail:	Other (Describe) <input type="checkbox"/>		
Type of Grievance			
Abandonment <input type="checkbox"/>	Infrastructure <input type="checkbox"/>	Environmental Problems <input type="checkbox"/>	Traffic, transport, etc. <input type="checkbox"/>
Assets/Properties affected by the project <input type="checkbox"/>	Loss of Income <input type="checkbox"/>	Employment <input type="checkbox"/>	Other: <input type="checkbox"/>
4. DETAILED INFORMATION ON THE GRIEVANCE			
Description of the grievance:			
Solution method requested by the complainant			
Have you ever filed a complaint on the same issue before?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Filed by any other reason		
Frequency of Incident Occurrence:	<input type="radio"/> One-off (when?) <input type="radio"/> Multiple times (what is the time interval?) <input type="radio"/> Constantly		

APPENDIX - D SAMPLE GRIEVANCE CLOSURE FORM

GRIEVANCE CLOSURE FORM	
5. DETERMINATION OF THE CORRECTIVE ACTION	
1	
2	
3	
4	
5	
Responsible Departments	
6. GRIEVANCE CLOSURE	
<i>This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.</i>	

Grievance Closure Date:

Grievance Closer's Full Name/Signature:
 Complainant's Full Name/Signature:

APPENDIX - E SAMPLE GRIEVANCE REGISTER

Complaint Register Number	How Complaint is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Utility Level, Regional TSKB Office, TSKB HQ Level)	Date of Complaint Received	Location of Complaint Received	Name of Person Receiving Grievance	Land Parcel # (If complaint is related to land)	Complainant Information					Project Component Related to Complaint	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Complaint Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
							Name/Surname	ID Number	Telephone/ e-mail	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken	