

PREPARED FOR:



DEVELOPMENT INVESTMENT
BANK OF TURKEY

sersim

Beştepe Mahallesi
Dumlupınar Bulvarı
No:6/1 İç Kapı No:21
Yenimahalle/Ankara/TURKEY
+90 312 295 6457
infratechsp.com

INFRATECH
ENGINEER • SOLVE • PLAN

OPERATION CAPITAL INVESTMENT PROJECT



STAKEHOLDER ENGAGEMENT PLAN (SEP)

FEBRUARY 7, 2023

Prepared By	Reviewed By	Date
Ezgi Sena Satılmış	M. Selcen Ak	February 7, 2023

This Stakeholder Engagement Plan has been prepared by
INFRATECH ESP on behalf of Development Bank of Turkey
within the scope of Operational Capital Investment Project supported by the World Bank (WB).
It cannot be reproduced and/or published by printing, photocopying,
or any other means without the permission of INFRATECH ESP;
nor may they be used for any purpose other than for which they were produced, without such permission.



TABLE OF CONTENTS

TABLE OF CONTENTS	i
LIST OF TABLE	ii
LIST OF FIGURE.....	iii
ABBREVIATIONS	iv
1. INTRODUCTION	1
1.1. BACKGROUND AND DESCRIPTION.....	1
1.2. PURPOSE AND SCOPE.....	3
1.2.1. Purpose	3
1.2.2. Scope.....	4
1.3. DEFINITIONS.....	4
1.4. PRINCIPLES	5
1.5. IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN (SEP)	6
2. NATIONAL AND INTERNATIONAL STANDARDS	7
2.1. INSTITUTIONAL AND LEGAL FRAMEWORK IN TURKEY	7
2.2. RELEVANT INTERNATIONAL STANDARDS AND PRINCIPLES.....	9
2.2.1. IFC Performance Standards	9
2.2.2. World Bank Environmental and Social Standards	12
3. ROLES AND RESPONSIBILITIES	13
4. STAKEHOLDER ENGAGEMENT.....	15
4.1. EARLY ENGAGEMENT	15
4.2. STAKEHOLDER IDENTIFICATION	18
4.3. DISADVANTAGED/ VULNERABLE INDIVIDUALS OR GROUPS	20
4.4. STAKEHOLDER ENGAGEMENT PROGRAMME	21
4.5. TOOLS & METHODS FOR INFORMATION DISCLOSURE.....	26
4.5.1. Internal / Web Site	26
4.5.2. Information Sheets.....	26
4.5.3. Responding to Local Communities and Publications for People	26
4.5.4. Disclosure Activities	26
5. MANAGEMENT OF GRIEVANCE	28
5.1. GRIEVANCE AND FEEDBACK PROCEDURE	28
5.1.1. Principles of the Grievance Redress Mechanism (Internal and External)	28
5.1.2. Collection, Registration and Evaluation of Grievances	29
5.1.3. Feedback to the Stakeholders	29
5.1.4. Grievance redress Mechanism Communication	29
5.2. CONTACT DETAILS	30
6. MONITORING	31
6.1. KEY MONITORING ACTIVITIES	31
6.2. KEY PERFORMANCE INDICATORS (KPIs)	32
7. TRAINING	33
8. AUDIT AND REPORTING.....	34
8.1. RECORD KEEPING AND REPORTING	34



LIST OF TABLE

Table 1 Distances to the Nearest Settlements	2
Table 2 The Previous Engagement Activities	17
Table 3 Stakeholder Groups.....	18
Table 4 Stakeholder Engagement Programme	23
Table 5 Key monitoring Measures	31
Table 6 Key Performance Indicators (KPIs)	32



LIST OF FIGURE

Figure 1 Location of Sersim/Simfer.....	1
Figure 2 Sersim Facility and Nearest Neighbourhoods	3
Figure 3 Meeting with Sersim Employees.....	15
Figure 4 Stakeholder Prioritization Table	20



ABBREVIATIONS

Aol	Area of Influence
CMR	Complaint Management Representative
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESDD	Environmental and Social Due Diligence
ESHS	Environmental, Social and Health and Safety
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
HR	Human Resources
HS	Health and Safety
IFC	International Finance Corporation
Infratech or Consultant	Infratech Yazılım, Mühendislik ve İnovasyon A.Ş.
KPI	Key Performance Indicator
PS	Performance Standard
SEP	Stakeholder Engagement Plan
Sersim/Simfer	Sersim Dayanıklı Tüketim Malzemeleri San. Tic. Koll. Şti.
SRS	Social Responsibility Staff
TKYB	Türkiye Kalkınma ve Yatırım Bankası A.Ş. Development and Investment Bank of Turkey



1. INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for Operation Working Capital Investment Project with the reference number of SRSIM-PLN-SOC-002 within the scope of the contract made between Sersim Dayanıklı Tüketim Malzemeleri San. Tic. Koll. Şti. (hereinafter referred as Sersim) and Infratech Yazılım, Mühendislik ve İnovasyon A.Ş. (“Infratech” or “Consultant”) to meet the requirements of Environmental and Social Action Plan (ESAP).

This SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfil the required studies to evaluate the Environmental and Social Impacts of the Project according IFC Performance Standards (“PSs”) and, Development and Investment Bank of Turkey (TKYB) Environmental and Social Policy and World Bank Environmental and Social Standards (“ESSs”).

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

1.1. BACKGROUND AND DESCRIPTION

Sersim started its operations in 1977 with the production of Turkey's first integrated solid fuel stove. In 1997, it expanded its field of activity by starting the production of cooker group products. By opening its cooler factory in 2015, it has a total production area of 215,000 m² with 3 different production facilities and increased the number of its employees to more than 2000. Simfer is one of the leading household appliances manufacturers in Turkey, exporting to more than 150 countries, and is among the first 500 industrial enterprises in Turkey with an annual production capacity of 6 million units.

The location of Sersim, which continues its activities in its factory in Kayseri Free Zone, is given below.



Figure 1 Location of Sersim/Simfer

The Area of Influence (AoI) includes both Sersim's field of activity and the settlements around it. The settlements within the social scope of this Plan are Tınaztepe, Hürmetçi, Karpuzsekisi, Anbar, Boğazköprü and Saraycık Neighbourhoods. The distances of the closest settlements to the Sersim are given in Table 1 and shown in Figure 2 below.

Table 1 Distances to the Nearest Settlements

Settlement	Distance to the License Area (km)	Population		
		Male	Female	Total
Tınaztepe Neighbourhood	3,71	5.843	5.757	11.600
Hürmetçi Neighbourhood	4,60	82	86	168
Karpuzsekisi Neighbourhood	8,11	430	384	814
Anbar Neighbourhood	2,55	2.349	2.065	4.414
Boğazköprü Neighbourhood	2,67	39	33	72
Saraycık Neighbourhood	4,00	1.242	1.127	2.369





Figure 2 Sersim Facility and Nearest Neighbourhoods

1.2. PURPOSE AND SCOPE

1.2.1. Purpose

The SEP to be implemented by Sersim primarily aims to define a technically and culturally appropriate approach to information provision, consultation, and participation. The main purpose of SEP is to ensure that sufficient and necessary information is given to the stakeholders in a timely manner and to develop tools for these groups to voice their opinions and concerns and to resolve these concerns/problems. The purpose of this SEP is to:

- Identify stakeholders and their interest to the Sersim,
- Set out applicable management interfaces,
- Define roles and responsibilities,
- Outline the applicable project standards relevant to this Plan,
- Define Sersim 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 Sersim and local communities based on mutual trust and transparency.

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 Sersim and its stakeholders.

SEP also includes a grievance mechanism for raising stakeholder and public concerns, providing feedback and comments on the company's activities, and how to handle complaints from stakeholders and company employees. With the establishment of the grievance mechanism, stakeholders will be provided with the opportunity to ask questions they deem necessary, to express all kinds of concerns/complaints, and at the same time to respond to these complaints and comments received by Sersim.

1.2.2. Scope

This Plan is applicable to all activities of the Sersim, including the relevant facilities and all Contractors during the operational phase of the Project. All contractors will work in accordance with the relevant requirements and standards specified in this plan, after being approved by Sersim.

1.3. 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 behaviour.
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 behaviour 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.
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.

1.4. PRINCIPLES

During the implementation of this Plan, following principles will be followed to achieve an effective stakeholder engagement.

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
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.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.

1.5. IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT PLAN (SEP)

It is Sersim's responsibility to ensure that the SEP is fully integrated and implemented in all Sersim activities including the ones of contractors and subcontractors.

As part of the requirements of TKYB Policies, the SEP will be disclosed by Sersim on its official website both in English and in Turkish.

This SEP is a dynamic document and will be reviewed, updated and approved as needed. Sersim will be responsible for making disclosures through communication channels for each approved updated version of this SEP.

In addition, this SEP has overlap and cross-links with the Grievance Redress Mechanism (BLR-PLN-SOC-001) prepared for Sersim.



2. NATIONAL AND INTERNATIONAL STANDARDS

2.1. INSTITUTIONAL AND LEGAL FRAMEWORK IN TURKEY

The Constitution of The Republic of Turkey

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

I. Legal Egalitarianism

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

II. Prohibition of Forced Labour

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

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.

The Right to Information Law

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 Right to Information Law No:4982 (OG No. 25269, dated 24.10.2003).

The Use of Right to Petition Law



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 (OG No. 3071, dated 01.11.1984).

Labour Law No. 4857 (OG No:25134, dated 10.06.2003)

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 labour that will not hinder their physical, mental or moral development.

Unions and Collective Agreements Law No.6356 (OG No:28460, dated 07.11.2012)

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 No. 2872 (OG No:18132, dated 11.08.1983)

The purpose of the environment law is to protect and improve the environment which is the common asset of all citizens; make better use of, and preserve land and natural resources in rural and urban areas; prevent water, land and air pollution; by preserving the country's vegetative and livestock assets and natural and historical richness, organize all arrangements and precautions for improving and securing health, civilization and life



conditions of present and future generations in conformity with economical and social development objectives, and based on certain legal and technical principles.

2.2. RELEVANT INTERNATIONAL STANDARDS AND PRINCIPLES

International standards that Sersim must comply with are IFC Performance Standards and World Bank Standards.

The main objectives of international standards and principles are:

- Developing an appropriate procedure for identifying and identifying and confirming persons and communities and other interested parties who have impacted, affected and/or likely to be affected by the activities or practices of the Sersim;
- Preparation and continuous updating of a database of relevant stakeholders and associated facilities of the Sersim;
- Continuous review of this database by seeking the opinion of interested parties;
- Providing necessary information and consultancy services to stakeholders in order to ensure necessary participation in environmental and social issues that may affect them; and
- Continuing and actively maintaining respectful and constructive relations with stakeholders based on mutual trust and honesty and taking into account the values of stakeholders.

The basic requirements of international standards and principles are:

- Identification of stakeholders,
- Preparation of Stakeholder Engagement Plan,
- Providing the necessary information about the Sersim to the affected or likely to be affected communities,
- Providing important consultancy services by ensuring early and continuous participation,
- A grievance and feedback mechanism should be put in place in a timely manner, targeting stakeholders' concerns, complaints, wishes and requests regarding the Sersim.

2.2.1. IFC Performance Standards

IFC has determined 8 standards covering all social and environmental components and issues.

Performance standards are given below:

- IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- IFC Performance Standard 2: Labour and Working Conditions
- IFC Performance Standard 3: Resource Efficiency and Pollution Prevention
- IFC Performance Standard 4: Community Health, Safety, and Security
- IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement
- IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources



- ▼ IFC Performance Standard 7: Indigenous Peoples
- ▼ IFC Performance Standard 8: Cultural Heritage

IFC Performance Standard 1 outlines the SEP. Therefore, the SEP will be prepared according to the basic framework defined by IFC PS 1 and will be developed in a way to include the management of stakeholder engagement activities included in other performance standards.

The importance of including the stakeholders in the environmental and social performance management process has been emphasized within the purpose and scope of Performance Standard 1. "An effective Environmental and Social Management System is a dynamic and continuous process implemented and supported by the company management and includes the participation of the client, the employee, the local community directly affected by the project (Affected Communities) and, if any, other relevant stakeholders¹.

The following requirements for a meaningful stakeholder engagement are set out in IFC Performance Standard 1 as follows:

*"Performance Standard 1 means developing a comprehensive assessment to identify the environmental and social impacts, risks and opportunities of projects, (ii) engage effectively by publicizing project related information and consulting with them on issues that directly affect local communities, (iii) the client's environmental and social reveals the importance of managing its performance"*².

- ▼ Stakeholder engagement according to IFC standards, ensures the basis for the Project Owner to establish strong, constructive, and sensitive relationships with stakeholders.
- ▼ The stakeholder engagement process should be initiated at the earliest stage of the Project lifecycle, in land acquisition, economic and physical displacement and should continue throughout the life of the project.
- ▼ An effective stakeholder engagement mechanism ensures that affected communities and other relevant people and organizations are fully informed and meaningfully participate in monitoring the process.
- ▼ Stakeholder engagement facilitates provide the identification of avoidance, minimization, mitigation and remediation measures that are appropriate and sustainable.

Within the scope of IFC Standards, stakeholder engagement of the Project has been developed in line with the principles and strategies set out and explained below.

- a) Information Sharing: The information sharing studies carried out in the stakeholder engagement process of the project should ensure that the following components are understood by the stakeholders:
- i. The purpose and scale of the project,
 - ii. Duration of the project activities,
 - iii. Risks, potential impacts, and related mitigation measures on affected communities defined in the Stakeholder Engagement Plan,
 - iv. Tools and methods of the stakeholder engagement process,

¹ <https://www.ifc.org/wps/wcm/connect/2ee7f9f177a34739a9a4146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jlApldX>

² <https://www.ifc.org/wps/wcm/connect/2ee7f9f177a34739a9a4146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jlApldX>



- v. Access to information on the Grievance Redress Mechanism should be clearly explained.
- b) Consultation: For an effective stakeholder engagement, the consultation process should comply with the following principles.
 - i. Consultations will take place early in the process of identifying environmental and social impacts and risks and will continue as risks and impacts occur.
 - ii. Consultations will be based on transparent, objective, meaningful, accessible information in culturally appropriate narration and in a format that the affected communities can understand.
 - iii. Inclusive participation should focus on directly affected people, before the indirectly affected.
 - iv. There should be no external guidance, intervention or coercion.
 - v. Consultation processes to be carried out should be recorded.
- c) Informed Consultation and Participation: An informed consultation and engagement process based on the steps in the consultation process stated above will take place when projects have significant impacts on Affected Communities. In this consultation process;
 - i. If needed, opinions of both men and women will be obtained through separate meeting or participation methods, and the different concerns and priorities of men and women regarding project impacts, mitigation mechanisms, benefits of the project will be learned.
 - ii. Measures to prevent or reduce negative impacts and risks will be recorded and information will be provided on how the concerns of the affected people are taken into account³.
- d) A procedure will be prepared and implemented within the scope of IFC standards and recommendations on communication and complaint mechanism, which is one of the most important elements of stakeholder relations and stakeholder consultation process.

This procedure should include below items, in accordance with IFC standards clause P1;

- i. To answer and record external feedback from the public,
- ii. To prioritize and evaluate the issues raised, to determine how to respond,
- iii. To respond, follow and document the answers given,
- iv. To develop the methods required to properly update the stakeholder management program.

Along with the above requirements, in the Performance Standard 1 Evaluation and Management of Environmental and Social Risks and Impacts document published in January 2012 by IFC, "Where there are Affected Communities, the client will establish a Grievance Redress Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance".

According to IFC standards, the Grievance Redress Mechanism should aim to address concerns urgently, using a culturally appropriate, accessible, understandable and transparent consultation process. The party that raises a concern or complaint should not face any price or sanction. The complaint mechanism should not be an obstacle to resorting to legal or administrative remedies.

2.2.2. World Bank Environmental and Social Standards

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- ▶ Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- ▶ Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- ▶ The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

The World Bank recognizes that transparency and accountability are of fundamental importance to the development process and to achieving its mission to alleviate poverty. Transparency is essential to building and maintaining public dialogue and increasing public awareness about the Bank's development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. Openness promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and policies, and strengthens development outcomes. It facilitates public oversight of Bank-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems will be identified and addressed early on.



3. ROLES AND RESPONSIBILITIES

General Manager/ Board of Manager

- Ensures the implementation of this SEP,
- Determines the policies and targets regarding the social communication and stakeholder engagement,
- Appoints the Operational Manager and ensures the Operational Manager is aware of his / her responsibilities,
- Evaluates the reports provided by Operational Manager and ensures necessary actions were taken,
- Provides necessary resources for proper implementation of this SEP and GMP.

Operational Manager

- Coordinates with parties for proper implementation of this SEP,
- Ensuring that the grievance mechanism is implemented,
- Providing necessary resources for the implementation of the grievance mechanism procedure,
- Makes periodic inspections of the performance of Contractors of its operations during the installation phase,
- Reports to the General Manager/ Board of Manager about performance of the system,
- Ensures national and international legislations / guidelines which are applicable identified and tracked,
- Works in cooperation with other departments to determine targets for Environmental, Social and HS and resource efficiency issues,
- Makes the final decision concerning internal / external grievances (if needed) in the light of the assessments of Complaint Management Representative and Social Responsibility Staff.

Social Responsibility Department

- Records all formal and informal engagement activities with local communities in Stakeholder Management System,
- Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports,
- Monitors and records the social responsibility activities carried out and these records will be added to the stakeholder engagement reports quarterly,
- Forms relationships with the Sersim stakeholders,
- Organizes stakeholder meetings to collect the responses to grievances actively as required,
- Provides regular reporting back to the community on the management related to community grievances,
- Determines and provides the necessary training materials for employees,
- Implements the SEP and GMP.

Complaint Management Representative (CMR)



- Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.),
- Shows best efforts to resolve all complaints in one month,
- Searches the causes of the grievance and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Sersim and communities,
- Monitors all complaints and ensures that all complaints are resolved and closed,
- Follows the results of complaint and report on a weekly, monthly, and annual basis,
- Records and reports general and local employment rates and complaints, which are received or observed verbally,
- Filling out the “Complaint Register Form & Consultation Form”
- Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed),
- Implements the SEP and GMP.

Health, Safety and Environment (HSE) Department

- Determines the national and international legislations that are applicable to the and informs the Operational Manager,
- Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances,
- Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the installation stage and to audit the performance of the Contractors,
- Provides answers to the OHS, environment and social grievances raised by employees, the local community, and local institutions,
- Helps CMR for keeping the record of the complaints/suggestions in the Grievance Database with details,
- Supports CMR on the first evaluation of the relevance of grievances collected,
- Supports SRS for recording all formal and informal engagement activities,
- Determines corrective measures, if necessary,
- Checks the Environmental records and performance reviews of Contractors.

Contractors / Subcontractors

- Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence,
- Follows the rules listed in this SEP and other relevant Management System documentation of the Sersim.

Complying with the requirements and standards of the Stakeholder Engagement Plan.



4. STAKEHOLDER ENGAGEMENT

Stakeholder engagement is seen as an integral part of a project to manage its environmental and social impacts. Stakeholder engagement is defined in the IFC Environmental and Social Sustainability Performance Standards PS1 as follows: "Stakeholder engagement, in varying degrees, consists of analysing and planning stakeholders, informing, consulting and engaging, establishing a grievance mechanism, and continually reporting to affected communities".

4.1. EARLY ENGAGEMENT

The contact details i.e., e-mail address and phone number of the central office are presented on the website of Sersim (<https://www.simfer.com.tr/>). The communication / consultation form should be presented on the website of the Project Company. Grievance forms (Complaint Register Form) will be presented as Appendix 1.

According to the EIA Regulation, which entered into force with the Official Gazette dated 29.07.2022 and numbered 31907, a 'Stakeholder Engagement Plan' will be added to the EIA Application File. Since Sersim's activity is not included in the "Environmental Impact Assessment (EIA) Regulation" Annex-1 and Annex-2 lists, an official public participation meeting is not held.

Within the scope of engagement activities, any official consultation meeting has not been conducted up to date. However, in the scope of the Environmental and Social studies performed by Infratech, interviews and face-to-face meetings have been performed with mukhtars and several local governmental organizations on 17-18 January 2023. The purpose of this meeting was to learn whether the stakeholders have information about Sersim, which communication channels the stakeholders use to communicate with Sersim and their recommendations to strengthen.

During the fieldwork, random worker interviews were held. These interviews with the employees was conducted to get information on working conditions, complaints and suggestions. As a result of the interviews, it was learned that the employees were satisfied with the working conditions. On the other hand, it has been observed that employees prefer to submit verbal complaints rather than in written format.



Figure 3 Meeting with Sersim Employees

Also, within this scope, the following institution have been visited and positive-negative views and recommendations have been obtained:

- Kayser Kayseri Free Zone Directorate

A summary of previous engagement activities is provided in **Table 2** below.



Table 2 The Previous Engagement Activities

Participant	Date and Location	Scope of Meeting	
Mukhtar of Hürmetçi Neighbourhood İbrahim Demir	18.01.2023 Tea garden in the neighborhood	Determining the level of knowledge, opinions and concerns about the Sersim	
Mukhtar of Karpuzsekisi Neighbourhood Ahmet Bacak	18.01.2023 Tea garden in the neighborhood		
Kayser Kayseri Free Zone Directorate	17.01.2023 Governor's Office	Determining the level of knowledge, opinions and concerns about the Sersim	



4.2. STAKEHOLDER IDENTIFICATION

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.

Relevant stakeholder groups are:

1. External Stakeholders

- ▼ Communities
 - ▶ Local Communities – Affected settlements
 - ▶ Regional Communities and National Societies
- ▼ Official Authorities
 - ▶ National public institutions
 - ▶ Local/regional public institutions
 - ▶ Municipalities and Head Offices
 - ▶ Security and emergency forces
- ▼ Non-Governmental Organizations – Regional, national and international organizations
 - ▶ Universities and Independent Experts
 - ▶ Media
 - ▶ Construction Contractors
 - ▶ Other Related Parties

2. Internal Stakeholders

- ▼ Employees

Table 3 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
External Stakeholders		
Local Communities		
Mukhtars and residents of the following neighbourhoods ▶ Tınaztepe Neighbourhood ▶ Hürmetçi Neighbourhood ▶ Karpuzsekisi Neighbourhood ▶ Anbar Neighbourhood ▶ Boğazköprü Neighbourhood ▶ Saraycık Neighbourhood	✓	
Official Authorities		
▶ Kayseri Provincial Directorate of Industry and Technology ▶ Melikgazi District Sub-Governor ▶ Kayseri Free Zone Directorate ▶ Kayseri Metropolitan Municipality		✓



Stakeholder Groups	Stakeholder Type	
	Affected	Interested
▶ Melikgazi Municipality ▶ Ministry of Environment, Urbanization and Climate Change ▶ Ministry of Environment, Urbanization and Climate Change Kayseri Provincial Directorate ▶ Ministry of Labor and Social Security ▶ Ministry of Labor and Social Security Kayseri Provincial Directorate ▶ Kayseri Governorship		
NGOs		
▶ Kayseri Chamber of Industry		✓
Media/Press		
▶ Kayseri News Newspaper ▶ Kayseri Olay Newspaper		✓
Academics		
▶ Erciyes University		✓
Lenders		
▶ World Bank Group		✓
▶ TKYB		✓
Internal Stakeholders		
▶ Sersim Employees ▶ Contractors/Subcontractors	✓	✓

According to the influence/interest levels of the stakeholders given in Table 3, the Stakeholder Prioritization Table was created and given in Figure 4.



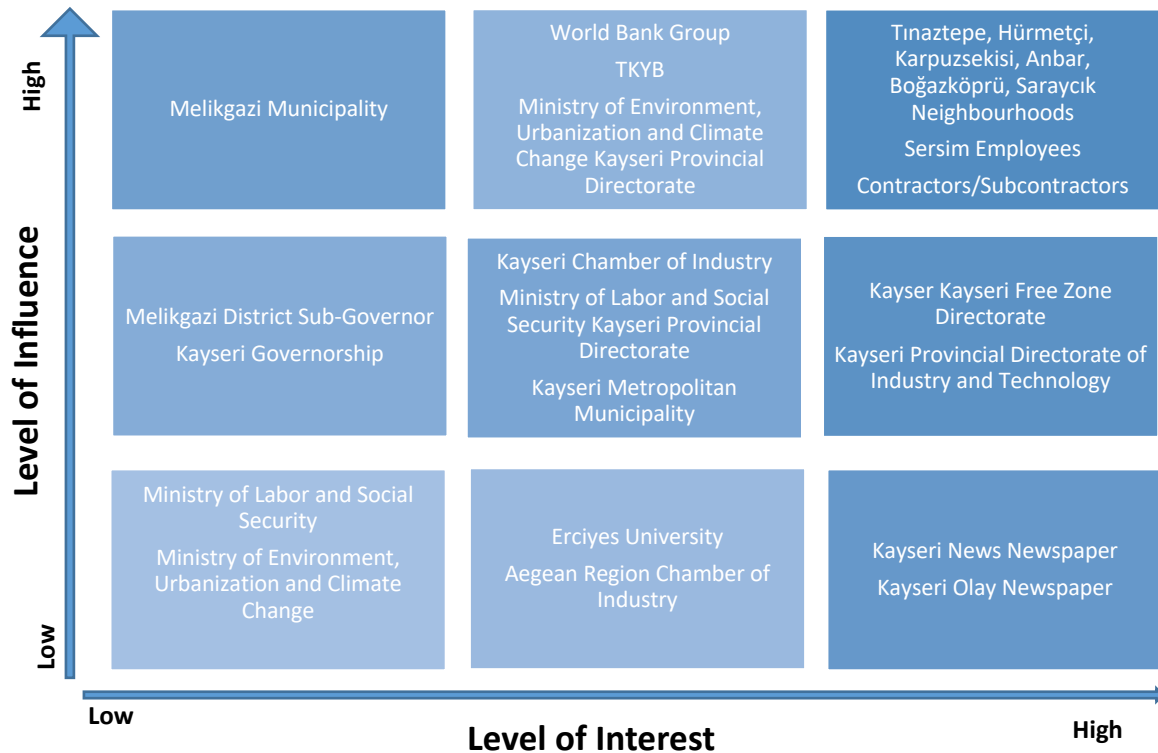


Figure 4 Stakeholder Prioritization Table

- High influence, highly interested Stakeholder: These stakeholders should be fully engaged, and the greatest effort should be made to satisfy them.
- High influence, less interested Stakeholder: Stakeholders in the upper left corner of the chart are the ones that need to be dealt with to be satisfied.
- Low influence, highly interested people: These stakeholders should be adequately informed and communicated to ensure that no major issues are arising.
- Low influence, less interested people: Stakeholders with both low influence and low interest should not be overlooked, but more time should be spent communicating with them.

4.3. DISADVANTAGED/ VULNERABLE INDIVIDUALS OR GROUPS

Under the category of “affected parties”, sensitive individuals or communities that may be directly/indirectly affected by Sersim's activities are analysed. Disadvantaged/vulnerable persons or groups are:

- Households with physically and / or mentally disabled family members
- People with chronic diseases,
- Elderly people over 70 years of age who live alone and in need of care,
- Women,
- Female-headed households,
- Households where the head of the household is a child,
- Households with low or no income, and

► Refugee households.

Lack of transportation to events, language differences and disability (mental or physical) will cause difficulties to reach the disadvantaged / vulnerable groups in terms of participating in consultation activities, events.

In addition, for the working stakeholders the timing of those event should be arranged in a way that they can also participate in the consultations event, or alternative solutions for those will be created. At this point, the following measures should be taken:

- ▼ Providing translation for the refugees who do not understand/speak Turkish,
- ▼ Providing written materials in larger fonts and Braille
- ▼ Choosing accessible venues for the consultation events and/or providing transportation for the people in remote areas (for example in villages)
- ▼ Organizing small events or meeting for the vulnerable people depending on their sensitivity (for example a small meeting with deaf individuals accompanied by a sign language expert)
- ▼ Organizing the events/meetings or consultation processes with the vulnerable / disadvantaged groups in coordination with the relevant NGOs (if any)
- ▼ The timing of the consultation events should be arranged in a way that the working stakeholders can be able to participate. For those who cannot participated even though the timing is arranged, brochures, an active web page, social media, face-to-face individual meetings etc. could be organized.

4.4. STAKEHOLDER ENGAGEMENT PROGRAMME

Sersim has an overarching goal of developing sustainable relations with its stakeholders and will therefore continue to engage stakeholders through various activities within the scope of the detailed and presented Stakeholder Engagement Program.

This SEP and Stakeholder Engagement Program will be reviewed as necessary to ensure they remain valid, meet the needs of Sersim, affected communities and other relevant stakeholders, and comply with international standards.

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 Grievance Redress Mechanism,
- ▼ Meetings with regulatory bodies,
- ▼ Public meetings,
- ▼ Published on local municipalities' website (if available) and/or on a dedicated Sponsor's website,
- ▼ Announcements through mukhtars and locals,
- ▼ Provision of general information on noticeboards at key public locations.

The following **Hata! Başvuru kaynağı bulunamadı.** summarizes the stakeholder engagement program in terms of:



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

Some of the strategies to be adopted to effectively interact and communicate with vulnerable groups will be towards:

- Identify the leaders and organizations of vulnerable and marginalized groups to reach these groups,
- Maintain a database of marginalized groups through existing industry associations, e.g., disability organizations,
- Engage community leaders, CGOs and NGOs working with vulnerable groups,
- Organize face-to-face focus group discussions with these populations, as and when appropriate.
- The awareness-raising and stakeholder engagement with vulnerable groups will take into account their particular sensitivities, concerns, and cultural sensitivities, to ensure their full understanding of project activities and benefits.



Table 4 Stakeholder Engagement Programme

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
▶ All affected settlements and Interested parties ▶ Local communities ▶ Local government ▶ Local businesses and industries	Information Disclosure 1. Purpose, start date, duration, and nature of installation and operations activities, 2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts, 3. Grievance mechanism disclosure, 4. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results, 5. Continue disclosing information via the Project company website.	Company website	Implementation during the operation Review for updates every 2 years during the operation and as required	Social Responsibility Department
▶ All affected settlements and Interested parties ▶ Local communities ▶ Local government ▶ Local businesses and industries	External Grievance Mechanism 1. Disclosure of grievance mechanism to communities, 2. Disclosure of grievances received and resolved to communities.	Dependent on stakeholder classification	Implementation during the operation Review for updates every 2 years during the operation	Social Responsibility Department CMR
▶ Local business and industries ▶ All affected settlements and mukhtars ▶ Sersim Workers ▶ Ministry of Labour and Social Security	Employment and Procurement Strategies 1. Recruitment of employees, 2. Training of staff, 3. Procurement of supplies and services.	Dependent on stakeholder classification	During the operation Review for updates every 2 years during the operation and as required	Social Responsibility Department
▶ NGOs	Social progress, economic and social development, and environmental protection Provision of information on: 1. Mitigation measures against potential environmental and social risks, 2. Sustainability criteria,	Focus group meetings if requested Company website	As r equired / As requested	Social Responsibility Department

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
	3. Social responsibility projects, implementation principles, 4. Cumulative impacts of project in the region.			
► All affected settlements and mukhtars	Management of environmental and social risks of the Project Provision of information on: 1. Environmental monitoring program 2. Environmental monitoring results 3. Overall information about progress of the Project 4. Cumulative impacts in the region	Meetings with Mukhtars Brochures	As required / As requested	Social Responsibility Department HSE Manager
► Vulnerable Groups	Employment and any other interest of vulnerable groups Provision of information on: 1. Recruitment of employees, 2. Training of staff, 3. Local employment, 4. Important commercial opportunities, 5. Environmental impacts.	Meetings targeting any identified vulnerable groups Women meetings and focus group discussions	Meetings during the operation As requested / as required for other meetings	Social Responsibility Department
► Workforce ► All affected settlements and mukhtars	Community Health 1. Provide training on Company policies (employees and contractors) on respectful and appropriate behaviour with communities, 2. As part of orientation training, include awareness raising of the prevention and treatment of communicable diseases.	Face to face meetings Dependent on stakeholder classification	At least annually face to face meetings As requested / as needed for others	Social Responsibility Department
► Employees of the Project ► Project Contactor employees	Employee welfare Provision of information on: 1. Employee Grievance Mechanism,	Face to face interview	Monthly or when required due to the	Social Responsibility Department



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
	2. Labour rights, 3. OHS procedures, 4. Contractor management.	OHS Committee Labour audits	results of grievance mechanism	



4.5. TOOLS & METHODS FOR INFORMATION DISCLOSURE

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

4.5.1. Internal / Web Site

Sersim will keep information about updated on their website in both Turkish and English. The homepage of the website can be found here: <https://www.simfer.com.tr/>

4.5.2. Information Sheets

Information pages containing details on Sersim's approach to minimizing, mitigating and managing potential negative impacts of its activities will be prepared and made available on Sersim websites. Copies of these information sheets will be published in the mukhtars of the affected communities identified as stakeholders.

4.5.3. Responding to Local Communities and Publications for People

Authorities of the Sersim will give full and timely responses to requests, comments, and questions of local communities in addition to implementing the grievance procedure in the case of complaints. All requests shall be 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 social plans.

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

4.5.4. 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 announced, especially among the parties affected by Sersim's activities, at least 1 week before any meeting, through website announcements, through headmen and through information banners hung in mukhtar's offices,
- ▶ The location and timing of any meeting will be designed to maximize accessibility to the stakeholders affected by Sersim's activities, and if necessary, transportation arrangements will be made by Sersim to increase participation in the meetings,
- ▶ The information presented (via presentations, leaflets, website publications etc.) will be clear and will be presented in a non-technical language understood by those in the communities,
- ▶ Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Sersim 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.



Sersim 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. The Sersim will inform the public via meetings, media and other similar means, about how people can access Sersim related documents (such as this SEP and grievance mechanism procedure) and the project timetable, and how they can submit comments regarding said documents.

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 Sersim. 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,
- ▶ Announcements through the website,
- ▶ Online stakeholder engagement workshops by using live web streaming,
- ▶ Multiple communication options such as closed captioning for video/conference calls.



5. MANAGEMENT OF GRIEVANCE

5.1. GRIEVANCE AND FEEDBACK PROCEDURE

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

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 Complaint Management Representative (CMR), who is the primary interfaces between the community and the contractor, and Complaint Management Representative who is responsible for customer grievances. Complainants will have the chance to provide their names to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. CMR is recommended to be nominated from either Corporate Communications or Social Responsibility department. The SRS and CMR are expected to conduct a bridge between the firm and the employees, 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 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 CMR 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 Sersim.

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

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- **Keeping it up to date:** The process will be regularly reviewed jointly by the SRS and CMR. Regular monitoring and evaluation should be conducted continuously.
- **Confidential and impartial process, non-retribution:** The process will be confidential and impartial, without employees fearing retribution.
- **Reasonable timescale:** A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, 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, mainly by the Social Responsibility Department and Complaint Management Representative;
- CMR registers the grievance/comment in the grievance database (see Appendix 4);
- The CMR investigates the grievance and makes the first evaluation with the help of relevant responsible department;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 days after the grievance is received);
- The grievance is officially closed after related documentation 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 by Complaint Management Representative, Human Resources, and HS and Environmental Departments; however, handling and tracking should be ensured to be done mutually.

A complaint form is prepared for official notification of complaints about the Sersim (see Appendix 1). "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 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 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 Sersim builds a more meaningful relationship with stakeholders. This is important in maintaining a 'social license to operate'.

The SEP will be reviewed and revised (if needed) every six months during installation phase and annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the Sersim stakeholders list will be reviewed and updated.

5.1.4. *Grievance redress 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 redress mechanism will be communicated with all employees (including contractor's employees) during the recruitment process and the first EHS training sessions will also include the stakeholder engagement and grievance mechanism process trainings;
- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings;
- The grievance/suggestion boxes will be made available around Sersim Facilities 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 internal grievances from community:

- Grievance redress mechanism will be communicated with stakeholders during stakeholder engagement meetings;
- Stakeholders will be aware of the location of the grievance/suggestion forms presented on the website and how to submit their grievances (either through web site or with grievance/suggestion boxes).

The grievance redress mechanism constitutes three parts: Customer, External and Internal (Workers, subcontractors, and suppliers of the Sersim). These three mechanisms will have different respondents: The Customer Complaint Mechanism will be carried out by the Quality Department, the Internal Complaint Mechanism will be carried out by the Social Responsibility Department, and the External Complaint Mechanism will be carried out by the CMR. General Manager will be under the responsibility of different departments collaborating, such as HS Department, Environmental Department, HR, Finance, Corporate Communications and alike. A sample of the grievance form is presented in Appendix 1.

5.2. CONTACT DETAILS

Sersim	Contact Person
Website: https://www.simfer.com.tr/	Phone: To be determined.
Address: Serbest Bölge 12. Cad. No: 18 Melikgazi/Kayseri	E-Mail: To be determined.
Phone: +90 352 666 03 13	Address: To be determined.
Fax: +90 352 311 34 10	



6. MONITORING

6.1. KEY MONITORING ACTIVITIES

Sersim 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 (labour rights) and social performance of the Sersim mainly through:

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

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

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

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

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are set out in Table 5.

Table 5 Key monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	Sersim will review Grievance Log/Database, including complaints closed and unresolved per period at a minimum monthly to include: ▶ number of outstanding complaints and grievances opened in the month, ▶ number of complaints and grievances opened in the month, ▶ number of complaints grievances closed in the month; and ▶ type of grievance.	Grievance Records	Monthly	Main office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Main office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Main office



Topic	Indicator	Method	Periodicity	Location
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	Main office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out by Sersim and these records will be included in the quarterly stakeholder engagement reports.	Annual reports	Bi-annually (installation) Annually (operation)	Site office

6.2. KEY PERFORMANCE INDICATORS (KPIs)

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KPIs are given in Table 6 below.

Table 6 Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measures
Total number of community complaints or grievances	Total number reduced bi-annually	Grievance Database
Total number of customer complaints or grievances	Total number reduced bi-annually	Grievance Database
% of complaints that are responded within 5 days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Redress Mechanism to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	E&S Monitoring Reports



7. TRAINING

All necessary training will be provided as induction training to provide general awareness for all employees of the Sersim and its contractors. Job-specific training will be also provided as necessary including stakeholder engagement and grievance management. The implementation of this grievance mechanism will be followed by the Social Responsibility Staff, Complaint Management Representative and other personnel and supervisors of the Sersim. Contractors are also involved in or overseeing activities with local communities.

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 Sersim 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.

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 Complaint Management Representative, SRS and other personnel and supervisors of the Project and contractors involved.



8. AUDIT AND REPORTING

The compliance of this SEP will be monitored in line with Sersim's requirements.

Compliance with this plan will be subject to periodic audit by Sersim corporate audit as well as Sersim Lenders.

8.1. RECORD KEEPING AND REPORTING

Record keeping will be done during the following cases:

- Consultation meetings
- Stakeholder engagement activities
- Complaints received and actions taken to close them
- Opinions/suggestions/comments submitted by community members during consultation meetings and stakeholder engagement activities (will be recorded in the grievance mechanism)
- Press releases and talks
- Audit, inspection and records of events

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 Social Responsibility Staff will evaluate and conclude this overview with Sersim management in the monthly progress meetings.





INfrATECH
ENGINEER•SOLVE•PLAN

STAKEHOLDER ENGAGEMENT PLAN

APPENDICES

Appendix 1: Grievance Register Form

Appendix 2: Grievance Closure Form

Appendix 3: Consultation Form

Appendix 4: Grievance Database



APPENDIX 1

Grievance Register Form



Grievance Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ - wish to raise my grievance anonymously - request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	- By Post: - Mailing address: - By Telephone: _____ - By E-mail _____ - 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		
	- One-time incident/grievance (Date _____) - Happened more than once (how many times? _____) - 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 2

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 / Surname / Signature of the Person Complainant Closing the Complaint Name, Signature of
...../...../.....	



APPENDIX 3

Consultation Form



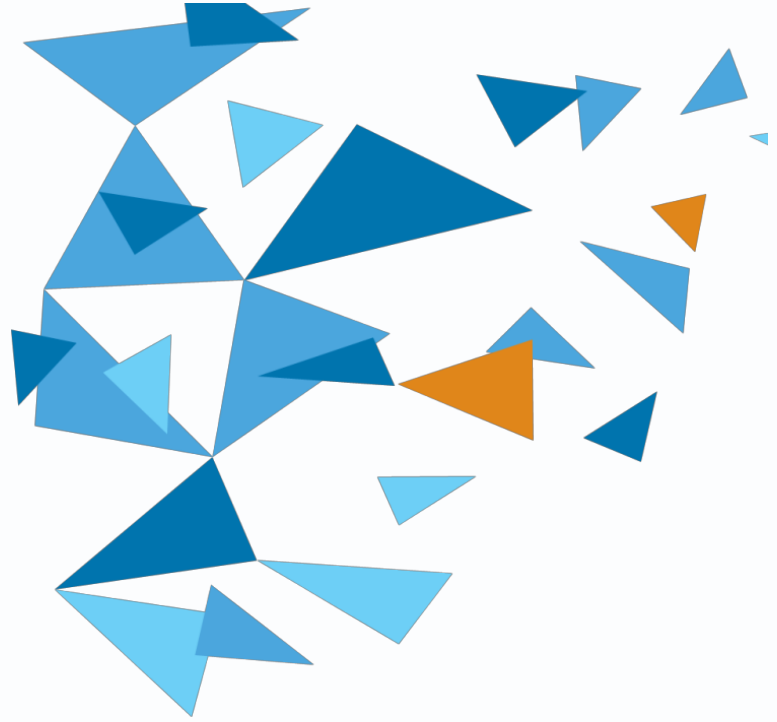
Consultation Form				
Reference No:				
Person Filling the Form:			Date:	
Interview Agenda:			Reference No:	
Information on Consultation				
Interviewee Institution:			Communication Type	
Name-Surname of the Interviewee:			Phone/Free Line ☐	
Phone:			Face to face interview ☐	
Address:			Web-site/ E-Mail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



APPENDIX 4

Grievance Database



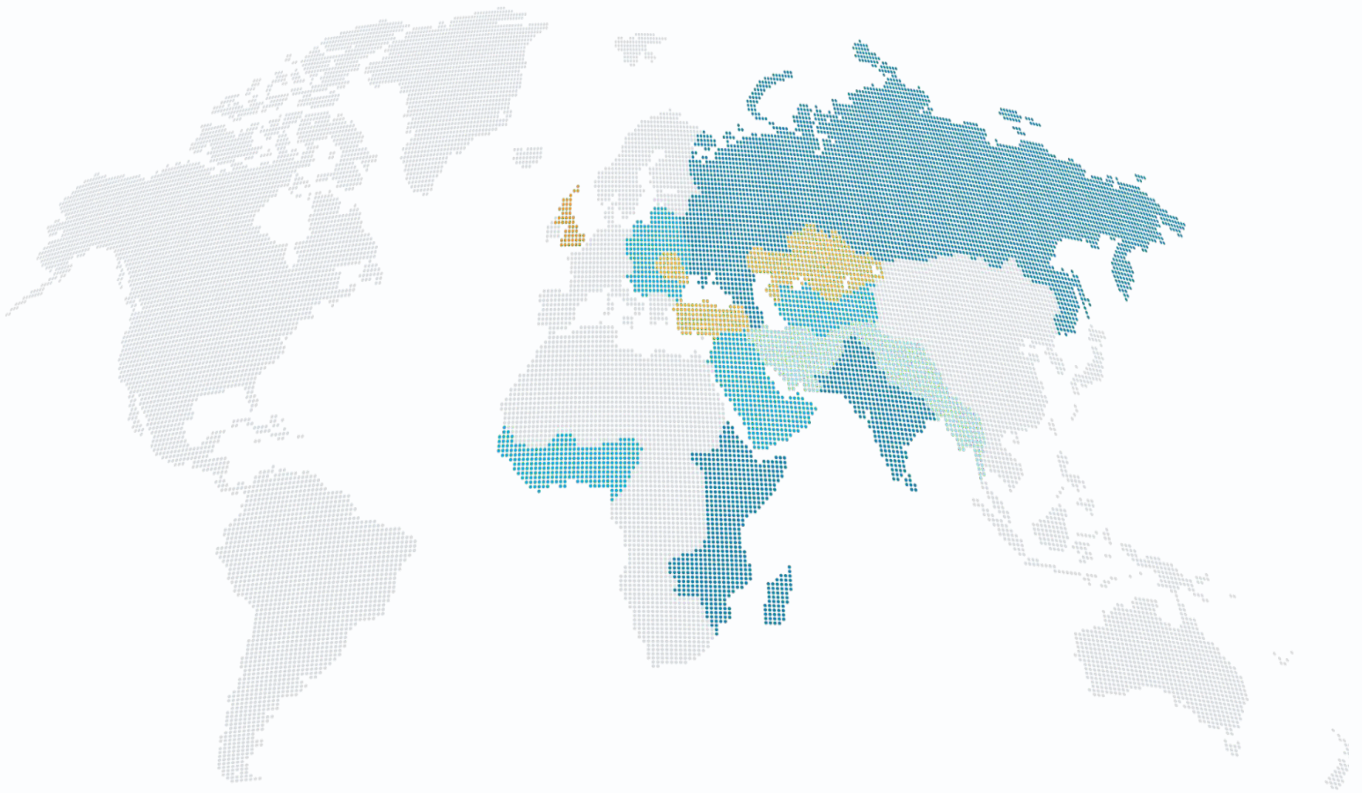


INfrATECH
ENGINEER•SOLVE•PLAN

Turkey Bel tepe Mah. Dumlupınar Bulv. No:6/1 Ç Kapı No: 21 Yenimahalle Ankara / Türkiye

United Kingdom 74A HighStreet, Wanstead, London, E11 2RJ

Kazakhstan Almaty city, Bostandyk District, Al-Farabi Avenue, ap.17, Nurdy Tau Business Center, Block B, Office 404



Great Britain-Eastern Europe-Central Asia-Middle East-South Asia-East Africa-West Africa