



Draft Report

Stakeholder Engagement Plan

Plan No: KVKÇ-PLN-SOC-SEP-001

ULAŞ Food Operation Capital Investment Project



ASIAN INFRASTRUCTURE
INVESTMENT BANK

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Abbreviations

Aoi	Area of Influence
AIIB	Asian Infrastructure Investment Bank
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff
The Project	ULAŞ Food Operation Capital Investment Project
TKYB	Development and Investment Bank of Turkey

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for “ULAŞ Food Operational Capital Investment Project” (“Project”). This SEP, which identified target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according to national legislation, IFC Performance Standards (“PSs”) and AIIB Environmental and Social Standards (“ESSs”). The reference number of this Plan is KVKÇ-PLN-SOC- SEP-001.

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

1.1 Background

Founded in 1920, Kavukçu is one of the leading wheat flour and pasta producers in Turkey. Ahmet Araboğlu laid the foundations of the company by establishing the first modern flour factory of the period in Havza, Turkey in 1920. Today, Kavukçu has become an important player in the Turkish wheat flour, pasta, and grain markets. One of the subsidiaries of Kavukçu Group, Ulaş Gıda Un Tekstil Transport Ticaret ve Sanayi A.Ş. was established in 1996. Flour production, storage, packaging and sales are carried out in the facility that is the subject of the Project, which is located within the borders of Büyükkarıştıran Town of Lüleburgaz District in Kırklareli Province.

1.1.1 Area of Influence

The Project area is located within the boundaries of Yeni Neighborhood however the closest distance from the Project area to a discrete house is approximately 550 meters. Other close settlements to the Project area are Yıldırım and Fatih Neighborhoods within the borders of Büyükkarıştıran Town.

The populations, closest distances to the Project area and the directions are given in the following table, and boundaries of the neighborhoods are given in the Figure 1-1.

Table 1-1. Closest Settlements in the Aol

Settlement	Distance to the Project Area (m)	Direction	Population		
			Total	Female	Male
Yeni Neighborhood	~550	Northwest	820	394	426
Yıldırım Neighborhood	~690	East, West and South	2297	1123	1174
Fatih Neighborhood	~470	North	2519	1234	1285

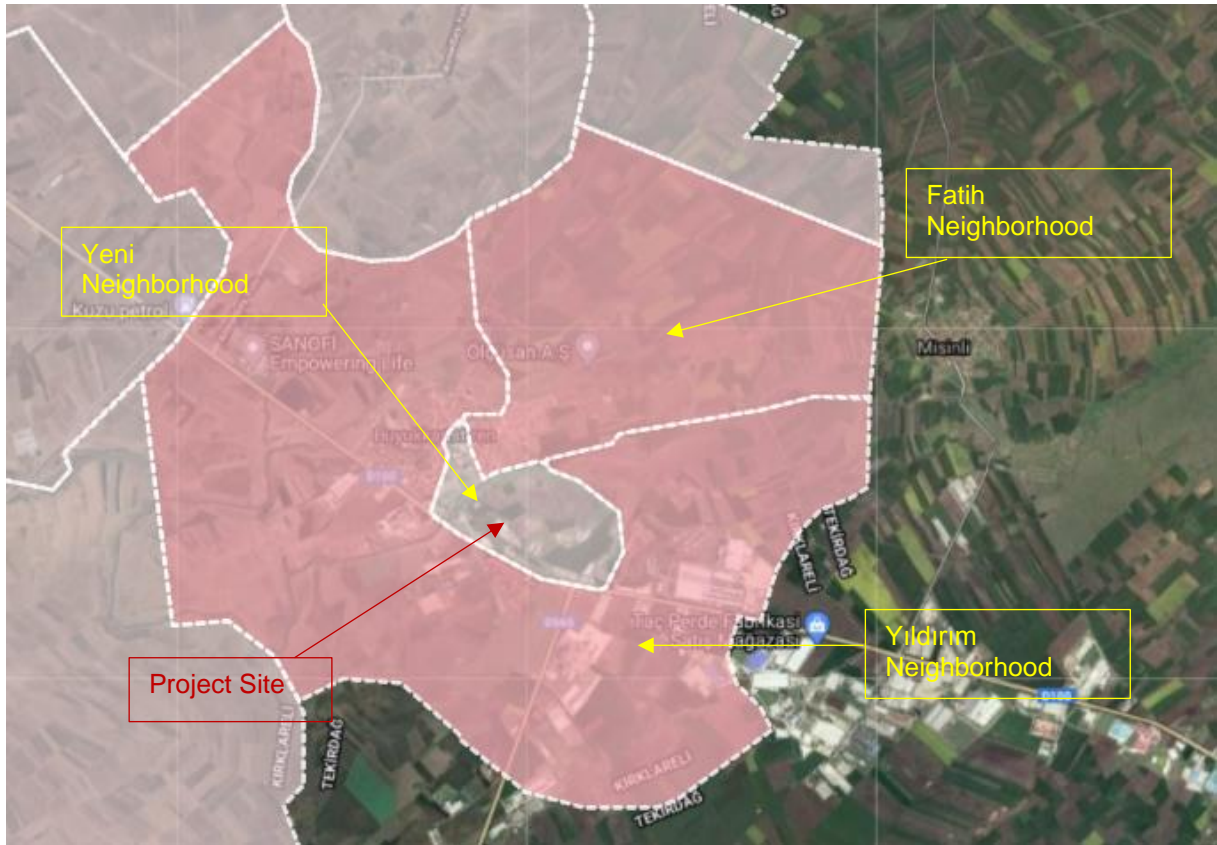


Figure 1-1. Boundaries of the Closest Neighborhoods

Moreover, the Site Location Map showing the Project area and settlement centers in the Project close vicinity is given in Figure 1-2.



Figure 1-2. Site Location Map

1.2 Purpose

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

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

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

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

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

- ✦ keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- ✦ establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
- ✦ understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.3 Scope

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

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

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

- ✦ Environmental and Social Management Plan,
- ✦ Grievance Mechanism Procedure (Internal and External),
- ✦ Occupational Health and Safety Management Plan,
- ✦ Emergency Response Action Plan.

1.4 Definitions

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

Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Vulnerable People	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2 KEY ROLES AND RESPONSIBILITIES

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

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> Approves of this Plan and resources required for implementation, Determines of the policies and targets regarding the social communication and stakeholder engagement, Ensures this plan is implemented during the lifetime of the Project, Ensures the facility's compliance with the Project Standards, and other requirements set out in this Plan, Provides necessary resources for proper implementation of this SEP and GMP (internal and external), Makes the final decision concerning internal and external grievances (if needed) in the light of the assessments of the Social Responsibility Staff (SRS) and HSE Manager, Determines of the social budget of the Project.
Operational Manager	<ul style="list-style-type: none"> Having overall responsibility for the implementation of this SEP by fulfilling project requirements, Determines f necessary resources for the proper implementation of this SEP and reporting it to the Top Management for procurement, Ensures implementation of the commitments in this Plan.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Coordinates the relevant parties for proper implementation of this Plan, Reports to the Top Management about the system performance, Ensures national and international legislations/guidelines which are applicable to the Project activities are identified and tracked, 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 inserting this detail into stakeholder engagement quarterly reports,

Roles	Responsibilities
	<ul style="list-style-type: none"> • Monitors and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement quarterly reports, • Forms relationships with the Project stakeholders, • Organizes stakeholder meetings to collect the responses to grievances actively as required, • Provides regular reporting back to the community on the management related to community grievances, • Determines and providing the necessary training materials for employees, • Implements SEP and GMP, • Keeps the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.), • Searches the causes of the grievance and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities, • Monitors all complaints and ensuring that all complaints are resolved and closed properly and in a timely manner, • Follows the results of complaint and reporting on a weekly, monthly, and annual basis, • Records and reporting general and local employment rates and complaints, which are received or observed verbally, • Fills out the “Grievance Register Form & Consultation Form” (see Appendices A and B), • Gives the feedback to the stakeholders about the results of their grievances through Grievance Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 days that the grievance solution process has started and after the grievance closed).
Health, Safety and Environment (HSE) Manager	<ul style="list-style-type: none"> • Makes periodic inspections of the performance of Contractors of its activities during operation phase, • Works in cooperation with other departments in order to determine targets for Environmental, Social, HS and resource efficiency, • Determines of the national and international legislations that are applicable to the Project activities and informing the Operational Manager, • Determines of 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 environmental, social and HS requirements as per the Project Standards during operation phase and auditing the performance of the Contractors on those requirements, • Provides answers to the OHS, environment and social grievances raised by employees, the local community and local institutions, • Checks the environmental and OHS records and performance reviews of the Contractors.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> • Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date,

Roles	Responsibilities
	<ul style="list-style-type: none"> Records and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> Contractors / Subcontractors are responsible not to make any commitment in their interactions with the stakeholders beyond their competence, Follows the rules listed in this SEP and other relevant Management System documentation of the Project, Complies with the requirements and standards of the GMP.

3 NATIONAL AND INTERNATIONAL STANDARDS

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

- ✦ applicable Turkish Standards,
- ✦ Turkish EIA requirements,
- ✦ other commitments to and requirements of Turkish Government authorities,
- ✦ applicable international standards and guidelines.

3.1 Applicable National Standards

The Constitution of The Republic of Turkey

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

I. Legal Egalitarianism

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

II. Prohibition of Forced Labor

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

III. Freedom of Thought and Opinion

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

IV. Freedom of Expression and Dissemination of Thought

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

V. Right of Petition

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

Law on The Right to Information

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

Law on The Use of Right to Petition

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

Labour Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of

his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

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

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

Overtime Work

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

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

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

Unions and Collective Agreements Law

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

Environmental Law

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

3.2 Applicable International Standards, Legislations and Guidelines

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

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

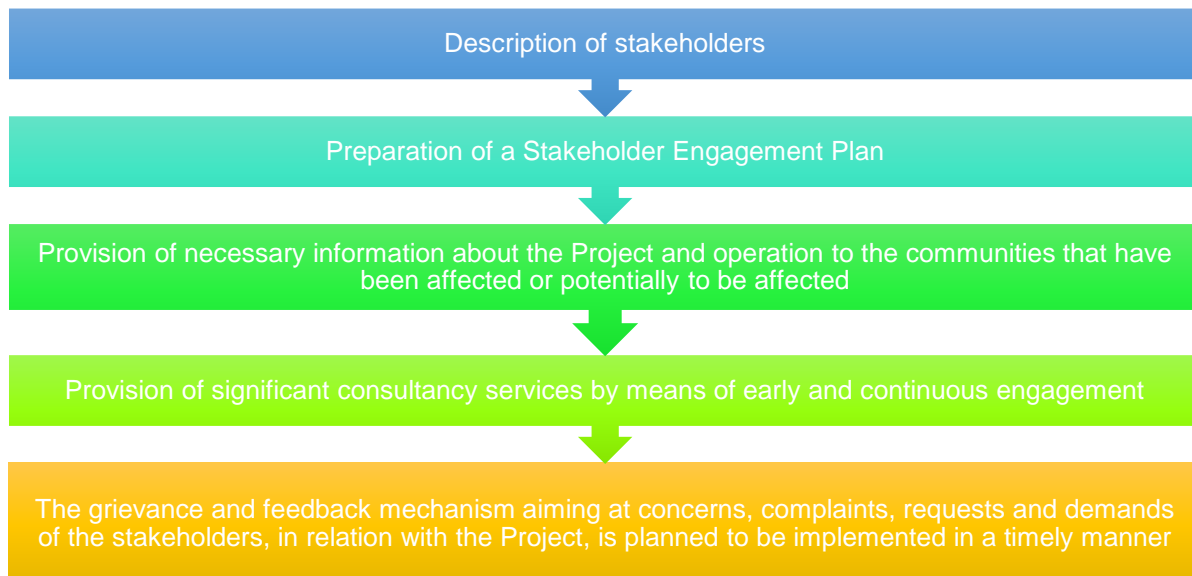


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.2.1 IFC Performance Standards

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

- ❖ An Environmental and Social Management System (“ESMS”) should be prepared and implemented, and the element of stakeholder engagement should be included,
- ❖ The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- ❖ When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- ❖ Affected Communities will be provided with access to relevant information on (i) the purpose, nature, and scale of the Project; (ii) the duration of proposed project activities;

(iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.

- ✦ A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- ✦ When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation (ICP) is to be conducted.

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

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

3.2.2 AIB Requirements

In Environmental and Social Framework set out by AIB describe the stakeholder engagement as follows:

*“The Bank believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients to achieve this objective. Meaningful consultation is a process that begins early and is ongoing throughout the Project. It is **inclusive, accessible, timely and undertaken in an open manner**. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders’ views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the Project.”*

3.3 Project Standards

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

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

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 MGS, interviews and face-to-face meetings have been performed with mukhtars and several local governmental organizations on 2-3 December 2021. The aim of those meetings was to obtain information on the socio-economic structure of the region through specifically prepared surveys.

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

- ✦ Büyükkarıştıran Town Municipality,
- ✦ Lüleburgaz Governorship,
- ✦ Lüleburgaz Chamber of Trade and Industry,
- ✦ Kırklareli Provincial Directorate of Environment and Urbanization (via online phone call),
- ✦ Association of Turkish Women Union, Lüleburgaz Branch (via online phone call).

A summary of previous engagement activities for the Project is provided in the Table 4-1 below.

Table 4-1. Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Community	Mukhtar of Yıldırım Neighborhood	02.12.2021 Mukhtar's office	<ul style="list-style-type: none"> The total population is about 2100, and this number increases up to 2400-2800 during the summer season. With the increase in the job opportunities due to the factories in the region, the population also increased in the last 5 years. The number of registered Syrian immigrant/refugee households is approximately 4-5. The population between the ages of 25-40 is the majority in the neighborhood. There is one multi-program high school in the neighborhood. The literate rate of the neighborhood is approximately 98%. The high school graduates are in the majority in the neighborhood (approximately 75%). The salaried-regular workers (insured) are in the majority in the region. Other income resources are retirement salaries, farming and/or animal husbandry, and trades, respectively. The neighborhood lands are mainly private lands, but there are also treasury lands, however the area is unknown. The main products grown in the neighborhood are wheat, barley, sunflower and canola, respectively. There are houses who engaged in animal husbandry (bovine and/or ovine animal), however the barns of those animals are not located within the boundary of the neighborhood. Infrastructural services such as electricity, drinking and utility water, sewerage and domestic solid waste and transportation of the neighborhood are provided by the Büyükkarıştıran Town Municipality. Some houses can use groundwater (private wells) for irrigation purposes. Houses mostly use natural gas (since 2002) and a small amount of coal for heating. There are mentally and/or physically disabled people (4 people) and households with female heads in the neighborhood, but their number is unknown. There are seasonal workers (Gypsies) who come to the region in summer and they stay in tents. The Project area is located within a picnic area in the region, which is legally specified as "nursery" in the records of the General Directorate of Land Registry and Cadastre, and the activities of the Project causes dust on the trees and vegetation in the this area. There is an oil odor complaint in the area because of the activities of another oil facility, The roads are deteriorated by the heavy trucks and there is a traffic problem due to the trucks, which carries the raw material and products, parking on the access road.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> The Project has positive impacts in the region in terms of economic contribution and potential social responsibility projects (flour aid in Ramadan). Local employment is preferred, moreover, some of the local residents are employed in the Project facility. In the neighborhood, there is a new investment in food sector, which aims to produce candies, jellybeans, chewing gum by Saadet Gıda.
Local Community	Mukhtar of Yeni Neighborhood	02.12.2021 Mukhtar's office	<ul style="list-style-type: none"> The total population is about 1500. There are 3-5 registered Turkmenian immigrant/refugees, and 5-10 households speaks Kurdish. The population between the ages of 25-40 is the majority in the neighborhood. There is 1 primary education school (including primary and secondary schools) in the neighborhood. There is 1 health center in the neighborhood with 2 doctors. The literate rate of the neighborhood is approximately 99%. The high school graduates are in the majority in the neighborhood. The network water flowrate can be insufficient especially in the apartments. The salaried-regular workers (insured) are in the majority in the region. Other income resources are farming and/or animal husbandry, retirement salaries, and trades, respectively. The job opportunities increased in last 5 years, and the average salary per household is 6000 – 7000 Turkish Liras. The neighborhood lands are mainly private lands, but there are also treasury lands. The main products grown in the neighborhood are wheat, sunflower and canola, respectively. There are 5 households who engaged in animal husbandry (ovine animal), and the total number of animals is 2000. There is one hostel in the neighborhood. Infrastructural services such as electricity, drinking and utility water, sewerage and domestic solid waste and transportation of the neighborhood are provided by the Büyükkarıştıran Town Municipality. Houses mostly use natural gas and a small amount of coal (about 15 houses) for heating. There is an old bridge in the neighborhood near the Project site, which is from the Ottoman time build by Mimar Sinan. There are also the remains of 3 Byzantine water gauges near the Project area.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> • There are mentally and/or physically disabled people (3 people) and elderly (over 70 years old) living alone, but the number is unknown. • The water supplied by the municipal network is turbid because it has not been rested before it is supplied. • A facility located in the close vicinity to the neighborhood, which produces electrical energy from natural gas belonging to Delta Energy operating, causes noise from time to time. • Due to the Project activities, a dust formation occurs from time to time. The trees and plants in the garden are covered with flour/powder. • Telephone and face-to-face communication methods are preferred by the Mukhtar. • The Project has negative environmental, social and cultural impacts. • The Project is expected to contribute the economy of the region. • The construction of the foundation for the pharmaceutical factory of a company named SE-VA in the region was started approximately one year ago, and the construction works are expected to be completed within two years. • The construction of another facility belonging to Salcano Bicycle continues and it is expected that the constructions works will be completed within a month. • Mukhtar has some communication problem with the Project Management due to unavailability of the manager. • Trucks/trailers coming to the Project area for the Project transport activities use the old bridge. Despite the fact that there are warnings on the weight limitation (3500 kilograms) on the bridge, multi-site heavy tonnage trucks use the bridge in question. This may cause the demolition of the historical bridge. In addition, heavy vehicles deteriorate the structure of the existing road. It is suggested that using a new road by making an intermediate road connecting to the main road, instead of the using the mentioned bridge.
Local Community	Mukhtar of Fatih Neighborhood	03.12.2021 Mukhtar's office	<ul style="list-style-type: none"> • The registered population is about 1800, however the total it is 2500-2700 in the neighborhood. • With the increase in the job opportunities in the region, the population also increased in the last 5 years. • The number of registered Syrian immigrant/refugee households is 2. • The middle-aged population is the majority in the neighborhood (approximately 60%). • There is no school or health center in the neighborhood. • The secondary school graduates are in the majority in the neighborhood. • The salaried-regular workers (insured) are in the majority in the region.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> • Other income resources are retirement salaries, farming and/or animal husbandry, and trades, respectively. • Due to increase in the industry in the region, the water resources have been decreased in the last 5 years. • The neighborhood lands are mainly private lands, but there are also treasury lands (approximately 100 decares). • The main products grown in the neighborhood are wheat, sunflower, barley and canola, respectively. • There are 20 houses who engaged in animal husbandry (bovine and/or ovine animal), and the total number of sheep is 1000-1200 in the neighborhood. • Infrastructural services such as electricity, drinking and utility water, sewerage and domestic solid waste and transportation of the neighborhood are provided by the Büyükkarıştıran Town Municipality. • Houses use natural gas and coal for heating. • There are the remains of 3 Byzantine water gauges within the boundaries of the neighborhood. • There are mentally and/or physically disabled people (5 people) and households with female heads in the neighborhood (20-30 women with low income). • Face-to-face communication is preferred by the Mukhtar for stakeholder engagement and consultation activities. • No negative impact is expected. • The Project has economic contributions to the region by local employment and procurement. • The Project buys in bulk instead of buying retail products from local producers. • The road is deteriorated due to the Project activities. • A railway project is planned to be passed from the neighborhood.
Local Institution	Lüleburgaz Governorship, District Governor	03.12.2021 Private Office	<ul style="list-style-type: none"> • The Project has not contacted the District Governor's Office yet. • Face-to-face meeting and then a communication channel via telephone is preferred. • It has been suggested that the District Governorate and/or Kızılay can be contacted regarding with the potential social responsibility projects. • . • Lüleburgaz is in an important position due to its proximity to both raw materials and export routes. Due to the fact that the Project is located in the region positive contribution to Lüleburgaz economy is expected.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> There is no complaint or comment coming to the District Governor's Office regarding with the Project. It is suggested that the studies for efficient processing of lands can be supported. There are around 4000 families in need known by the District Governorship in the region. Flour aid can be provided to these families.
Local Institution	Lüleburgaz Chamber of Trade and Industry Deputy Director of Trade Registry and Director of Accounting	03.12.2021 Private Office	<ul style="list-style-type: none"> Kavukçu Group / Ulaş Food is a registered member of the Chamber and has a Capacity Report. When required, the Project and the Chamber are contacted via e-mail or phone call. The Project's activities are export-oriented, and both support agricultural production in the region and provide employment. No negative events/situations were encountered with the Project. With the dues received from the members, the Chamber provides flour, oil and sugar donations through the markets during Ramadan. Contribution to such kind of social activities by the Project is suggested.
Local Institution	Büyükkarıştıran Town Municipality Mayor	03.12.2021 Private Office	<ul style="list-style-type: none"> There is face-to-face communication between the municipality and the Project, However, bilateral relations have been good for a long time. The Project is a smooth-running import-export project with high capacity. The Project provides flour aids and indirectly contributes the region. There is no negative comment regarding the Project. There are 5 more factories planned to be established in the Büyükkarıştıran region. It is thought that 22000 employees will be employed by the end of 2022 with large investments. The Project provided aid to the municipality's sports team and provided flour aid to the Municipality. The demands of the Municipality regarding social assistance are fulfilled by the Project
Local Institution	Kırklareli Provincial Directorate of Environment and Urbanization Branch Manager of Environmental Management and Inspection	08.12.2021 Via online phone call	<ul style="list-style-type: none"> There is not enough data in the directorate regarding the flour plants in the region. A visit to be conducted to the Directorate is expected.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Non-Governmental Institution	Association of Turkish Women Union, Lüleburgaz Branch	01.12.2021 Via online phone call	<ul style="list-style-type: none"> The association is working in areas such as preventing violence against women, providing trainings to women, etc. It does not have a member from the Büyükkarşiran region associated with flour production. Communication via e-mail is preferred. Since there are many companies producing flour in Lüleburgaz, no positive or negative opinion has been given for the Project. I has been suggested to increase female employment and to purchase from female producers. A contact with Lüleburgaz City Council is suggested for any potential social responsibility projects.

4.2 Stakeholder Identification

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening a wide array of potential stakeholders, including institutions, associations, NGOs and other informal groups, that should be involved in the engagement process.

The stakeholders were classified according to their type and status. The identified stakeholders are presented in Table 4-2.

Table 4-2. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
External Stakeholders		
Local Communities (Settlements in the Aol)		
Mukhtars and residents of the following neighborhoods <ul style="list-style-type: none"> • Yeni Neighborhood • Yıldırım Neighborhood • Fatih Neighborhood 	✓	
Government		
<ul style="list-style-type: none"> • Kırklareli Provincial Directorate of Environment and Urbanization • Kırklareli Provincial Directorate of Agriculture and Forestry • Lüleburgaz District Sub-Governor • Lüleburgaz District Directorate of Agriculture and Forestry 		✓
Municipality		
Büyükkarıştıran Town Municipality	✓	✓
NGOs		
<ul style="list-style-type: none"> • Lüleburgaz Chamber of Commerce and Industry • Association of Turkish Women Union, Lüleburgaz Branch 		✓
Internal Stakeholders		
<ul style="list-style-type: none"> • Kavukçu Group / ULAŞ Food Employees • Contractors/Subcontractors/Suppliers 	✓	✓

4.3 Stakeholder Engagement Program

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

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

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

The following summarizes the stakeholder engagement program in terms of:

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

Table 4-3. Stakeholder Engagement Program

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

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

4.4 Tools & Methods for Information Disclosure


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

4.4.1 Internal / Website

Project specific web site (www.kavukcugrubu.com) will keep information on the operations updated on an assigned website in both Turkish and English. Project facilities' physical address, telephone numbers and maps are given in the Project Website Communication Page (Figure 4-1). In fact, informative brochures, Grievance Mechanism Procedure should be available on this assigned website for each of the facilities, and through this website, it should be possible to send grievances to the Project.

CONTACT

Luleburgaz Factory
Çorum Factory
Istanbul Office



Address:
Ulas Gida Un Tekstil Nakliye Tic. ve San. A.S.
Eski İstanbul Cad. Büyükkarıştıran, 39780
Luleburgaz / Kırklareli - Turkey

Phone:
+90 288 436 2720

Fax:
+90 288 436 2723

Click for map.

Figure 4-1. Communication Webpage of KAVUKÇU GROUP

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned websites and

at the facilities offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 Responding to Local Communities and Publications for the Communities

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

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

4.4.4 Disclosure Activities

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

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

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women for women-only meetings. The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP, Grievance Mechanism Procedure, Non-Technical Summary, etc.) and the project timetable, and how they can submit comments, complaints and suggestions.

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

- ✦ Digital platforms, social media and messaging platforms,
- ✦ Secure grievance portal and announcements through the Project website,
- ✦ Online stakeholder engagement workshops by using live web streaming,
- ✦ Multiple communication options such as closed captioning for video/conference calls.

5 MANAGEMENT OF GRIEVANCES

5.1 Grievance and Feedback Procedure

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

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

Grievance procedures will be coordinated through the appointed Social Responsibility Staff (SRS) with the help of HSE Manager who are the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from Human Resources department. The SRS is expected to conduct a bridge between the

company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project SRS or HSE Manager, if it is not anonymous.

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

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

The grievance mechanism is developed to cover the following:

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

5.1.2 Collection, Registration and Evaluation of Grievances

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

- 🌿 Initiate the grievance procedure by filling up a Grievance Register Form (see Appendix A), mainly by the SRS,
- 🌿 SRS registers the grievance/comment in the grievance database (see Appendix E);
- 🌿 The SRS investigates the grievance and makes the first evaluation with the help relevant Department Chief / Manager;
- 🌿 Final decision is made, and further action is implemented in order to solve the grievance;

- ❁ The complainant is notified (if name provided) within 5 working days that the grievance solution process has started;
- ❁ The complainant is informed about the resolution (at most in 30 calendar days after the grievance is received);
- ❁ The grievance is officially closed after related documentation (Grievance Closure Form given in Appendix D) is completed; and
- ❁ Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

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

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

5.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 calendar days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 working days of grievance receipt.

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the Project builds a more meaningful relationship with stakeholders. This is essential in maintaining a ‘social license to operate’, which refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

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

5.1.4 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

- ✦ Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the first HSE training sessions will also include the stakeholder engagement and grievance mechanism process;
- ✦ Communication about the grievance mechanism will be repeated regularly with the toolbox trainings;
- ✦ The grievance/suggestion boxes will be made available at the Project facility sites for internal grievances; and
- ✦ All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

For the collection of external grievances from community:

- ✦ Grievance mechanism process will be communicated with external stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion);
- ✦ The grievance/suggestion boxes will be made available at the Mukhtars' offices or villagers' gathering points (such as tea houses etc.) in the nearest settlements; and
- ✦ Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

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

5.2 Contact Details

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

Table 5-1. Contact Details of the Project

ULAŞ Food Textile Shipping Trade and Industry Inc.
<p>Address: Ulas Gida Un Tekstil Nakliye Tic. ve San. A.S. Eski İstanbul Cad. Büyükkarıştıran, 39780 Luleburgaz / Kırklareli - Turkey</p> <p>Telephone: +90 (288) 436 27 20</p> <p>Fax: +90 (288) 436 27 23</p> <p>Website: www.kavukcugrubu.com</p>

6 MONITORING

6.1 Review and Revision of this Plan

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

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

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

6.2 Key Performance Indicators (KPIs)

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

Table 6-1. Key Performance Indicators (KPIs)

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

KPI	Target	Monitoring Measure
grievance are being adequately addressed		

6.3 Key Monitoring Activities

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

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

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

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

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

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

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

Table 6-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<p>The Project will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> • number of outstanding complaints and 	Grievance Database	Monthly	Site office

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

7 TRAININGS

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

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers. The trainings will be given in the first “Induction Training” session.

All employees of the Project and contractors are required to participate in community relations and human rights training. This training will provide the information on how to understand and respect different cultures and opinions and to be an effective team member by behaving appropriately with locals and colleagues.

7.2 Job Specific and Other Training Requirements

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

8 AUDITING AND REPORTING

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

8.1 Internal Auditing

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

8.2 External Auditing

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

8.3 Record Keeping and Reporting

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

- ✦ Consultation meetings,
- ✦ Community engagement activities,
- ✦ Grievances actions and close out of grievances,
- ✦ Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- ✦ Audits, investigations and incidents which will be managed according to the Project procedures.

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

APPENDICES

Appendix A: Grievance Register Form

Appendix B: Consultation Form

Appendix C: Internal Grievance Form

Appendix D: Grievance Closure Form

Appendix E: Grievance Database

Appendix A: Grievance Register Form

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

Appendix B: Consultation Form

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

Appendix C: Internal Grievance Form

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

Appendix D: Grievance Closure Form

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

Appendix E: Grievance Database

Grievance Database									
Reporting Period									
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 5 days that the grievance solution process has started.									
** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.									



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