



Draft Report

Grievance Mechanism Procedure (Internal and External)

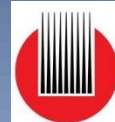
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ULAŞ Food Operation Capital Investment Project



ASIAN INFRASTRUCTURE
INVESTMENT BANK

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Abbreviations

AIIB	Asian Infrastructure Investment Bank
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESF	Environmental and Social Framework
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMPF	Environmental and Social Management Planning Framework
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 Grievance Mechanism Procedure (“GMP”) is prepared as a general stakeholder engagement plan document for “ULAŞ Food Operational Capital Investment Project” (“Project”). This GMP will be conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according to national legislation, IFC Performance Standards (“PSs”), Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy and AIIB Environmental and Social Standards (“ESSs”). The reference number of this Plan is KVKÇ-PRC-SOC- GMP-001.

This GMP reflects the general issues which should be taken into consideration during the operations of the Project, and 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 nearest 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

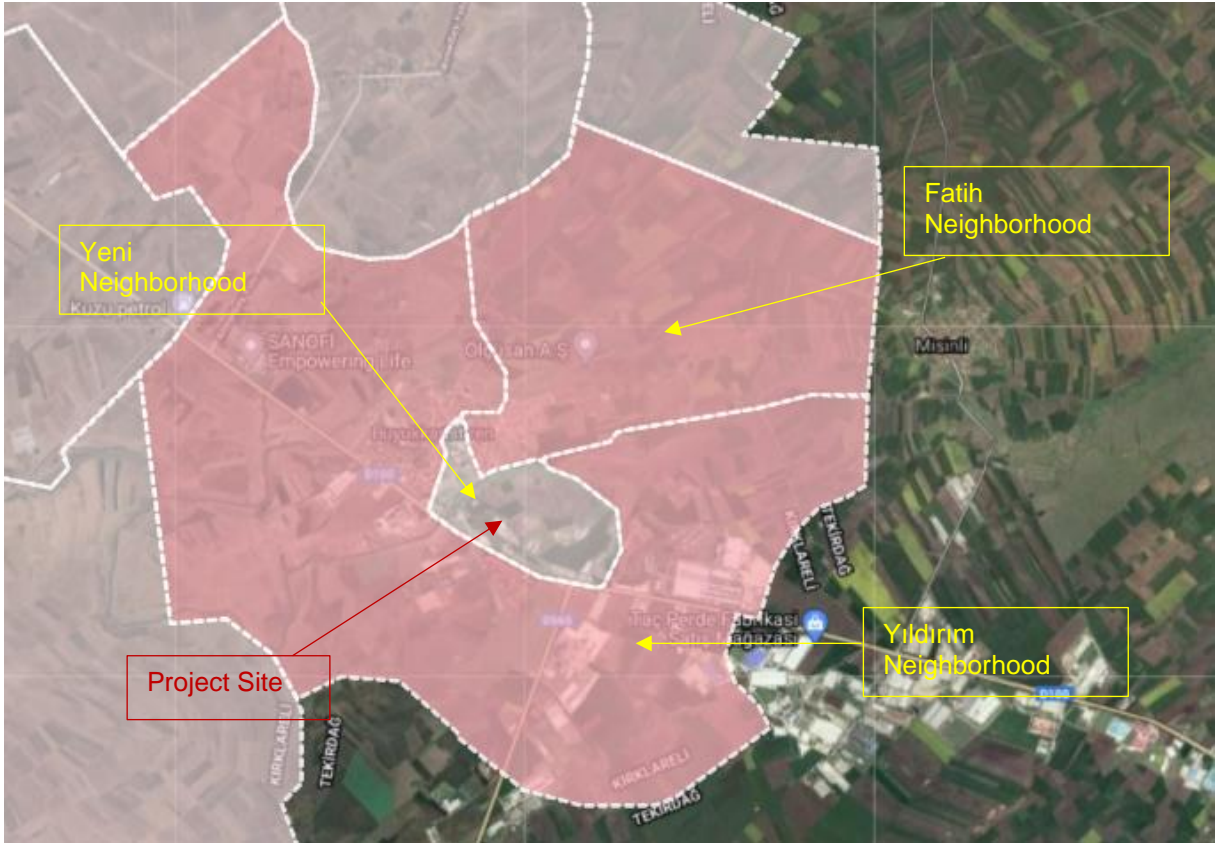


Figure 1-1. Boundaries of the Closest Neighborhoods

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 purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into business to eliminate or minimize social risks. The grievance mechanism aims to ensure that all comments, suggestions and complaints concerning the Project will be considered transparently and the related measures will be taken. The processes and responsibilities of this procedure will be defined for both external stakeholders and internal direct and indirect employees.

This procedure is under the responsibility of the Social Responsibility Staff (SRS) of the Project.

This document aims to identify:

- ✦ the scope of grievance mechanism procedure and the applicable management interfaces,
- ✦ the definition of roles and responsibilities,
- ✦ the applicable project standards, project commitments, operational procedures, and guidance relevant to this Procedure,
- ✦ monitoring and reporting procedures, including Key Performance Indicators (KPIs),
- ✦ training requirements and references for supporting materials and information,
- ✦ the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- ✦ how to minimize community conflict by systematically addressing grievances.

This procedure is not limited but can be updated. The procedure will be reviewed on a minimum annually basis during operation phase. During steady-state operations, this procedure will be reviewed on an annual basis to determine if there are any changes or updates required to the procedure unless a more frequent update is required to reflect changing project design or procedures. Any requests for changes to this procedure must be addressed to the owner of this procedure (SRS) and will be subject to appropriate review and approval processes.

1.3 Scope

This document outlines the grievance mechanism procedure which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints, suggestions and comments that may arise as a direct or indirect result of the environmental and social performance of the Project. The Grievance Mechanism Procedure (GMP) is not a replacement for stakeholder engagement activities.

This procedure (KVKÇ-PRC-SOC-GMP-001) covers all the grievances raised by internal and external stakeholders, including the activities of contractors.

This Procedure 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,
- ✦ Stakeholder Engagement Plan,
- ✦ Occupational Health and Safety Management Plan,
- ✦ Emergency Response Action Plan.

1.4 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Cultural 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.
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.
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

2.1 Key Principles

The Internal (Worker) and External Grievance Mechanisms will be implemented by relying on the following key principles for all the Project-related internal and external comments, issues, and complaints.

- ✦ **Transparency:** All the grievances are considered in the scope of the grievance procedure clearly and understandably.
- ✦ **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individuals or as a community.
- ✦ **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- ✦ **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- ✦ **Culturally Appropriate:** A complaint or an issue raised by local communities is considered in the manner of regional concerns and a convenient resolution process will be taken.

2.2 Roles and Responsibilities

Key roles and responsibilities relevant for the implementation of this Grievance Mechanism Procedure are outlined in this section (Table 2-1).

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> • Ensures this GMP is implemented during the lifetime of the Project, • Approves this GMP and providing necessary resources for the implementation of the procedure, • Ensures the facility compliance with the national and international standards, and other requirements set out in this Procedure, • Determines and making the final decision for the Project info and social budget of the Project.
Operational Manager	<ul style="list-style-type: none"> • Coordinates between the parties for proper implementation of this Procedure, • Makes periodic inspections of the performance of Contractors of its activities during operation phase, • Reports to the Top Management about the system performance, • Proposes the Project info and social budget of the Project to the Top Management, • Makes the final decision concerning internal and external grievances (if needed) in light of the assessments of Social Responsibility Staff (SRS) and HSE Manager.

Roles	Responsibilities
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> • Implements and improves this Procedure, • Ensures the Project compliance with the Project Standards and other requirements set out in this Procedure, • Ensures that all site staff, including Contractors and Subcontractors worker's complaints process and resolutions, comply with this Procedure, • Informs to workers about contract details and legal rights, • Determines and provides the necessary social training materials for employees, • Determines necessary resources for proper implementation of the Procedure and submitting to Operational Manager, • Evaluates in compliance with laws and regulations, • 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, • Coordinates with parties for implementation of the Procedure, • Creates all necessary reporting of worker grievance including monthly report to the Top Management, • Investigates and proposing appropriate methodology for resolving the complaint, • Follows procedures related to employment and training for site-specific issues, • Records and reporting general and local employment rates and complaints, which are received or observed verbally, • Fills out a "Grievance Register Form" (see Appendix A), • Follows the results of complaint and reporting on a weekly, monthly and annual basis, • Organizes cooperation activities with local communities, • Organizes stakeholder meetings to collect the responses to grievances actively as required.
HSE Manager	<ul style="list-style-type: none"> • Determines the environmental impacts and HS hazards in accordance with the actions, potential mitigation measures and measure to eliminate any potential social grievances, • Provides answers to the OHS, environment and social grievances raised by the employees, the local community and local institutions, • Helps SRS for keeping records of the complaints/suggestions in the Grievance Database with details, • Supports SRS on the first evaluation of the relevance of grievances collected, • Supports SRS for recording all formal and informal engagement activities, • Determines of environmental, social and HS-related corrective measures if necessary, according to grievances received, • Checks the environmental, social and OHS records and performance reviews of Contractors/Subcontractors.

Roles	Responsibilities
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> • Knows the roles and responsibilities in all Project documents, • Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, • 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, • Ensures that relevant activities are undertaken in accordance with this Procedure, • Ensures all personnel are fully trained in OHS, environmental and social issues. • Complies with the requirements and standards of the GMP.

3 NATIONAL AND INTERNATIONAL STANDARDS

The implementation and the procedure of this plan developed for the Project will comply with the related national and international requirements and standards. The Project Standards involves:

- ✦ 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:

1. 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.

Turkish EIA Requirements and 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

The international standards and guidelines which the Project will follow are set by IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

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

3.2.1 IFC Performance Standards

IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

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

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

- ✦ To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,
- ✦ To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks and impacts to workers, Affected Communities, and the environment.
- ✦ To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- ✦ To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- ✦ To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

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

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

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

Key requirements implemented by the Project according to *PS2* are as following:

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

- ❖ The Project will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits.
- ❖ The Project will make all policies understandable to all workers.
- ❖ The Project will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

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

Non-Discrimination and Equal Opportunity

- ❖ The Project will hire, promote, and compensate workers solely based on their ability to do the job and all workers are provided equal access to training, tools and opportunities for advancement.
- ❖ The Project will ensure that all workers will be free from harassment by management or other workers.

Retrenchment

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

Child Labor

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

Forced Labor

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

Grievance Mechanism

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

Occupational Health and Safety

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

Workers Engaged by Third Parties

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

Supply Chain

- ❖ The Project will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- ❖ The Project will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.
- ❖ The Project will monitor the performance of suppliers according to PS2 requirements concerning child labor and forced labor and significant safety issues.

3.2.2 AIIB Environmental and Social Standards

AIIB believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients (in this Project, ULAŞ Food) 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.

AIIB requires ULAŞ Food to undertake an environmental and social assessment that consist of varying elements including stakeholder identification and consultation plan and public consultation and information disclosure.

Also, AIIB requires ULAŞ Food to engage in meaningful consultation with stakeholders during the Project's preparation and implementation phases, in a manner commensurate with the risks to, and impacts on, those affected by the Project. The ESF explains the Meaningful Consultation as:

“Meaningful consultation is a process that: (a) begins early in the preparation stage of the Project and is carried out on an ongoing basis throughout the implementation and life cycle of the Project; (b) ensures that all parties have a voice in consultation, including national and subnational government, the private sector, nongovernmental organizations and people affected by the Project, including, as applicable, Indigenous Peoples; (c) provides additional support as needed to ensure participation of women, elderly, young, disabled, minorities and other vulnerable groups; (d) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to the people affected by the Project and other stakeholders; (e) is undertaken in an atmosphere free of intimidation or coercion; (e) is gender inclusive, accessible, responsive and tailored to the needs of vulnerable groups; and (f) enables the consideration of relevant views of people affected by the Project and other stakeholders in decision-making. Continue consultation with stakeholders throughout Project implementation as necessary on issues related to environmental and social performance and implementation of the Project-level grievance mechanism.”

In addition to meaningful consultation, environmental and social information on the Project must be available, in an accessible manner, and in a form and language(s) understandable to affected people and other stakeholders, during preparation and implementation of the Project so as to provide an opportunity to broadly identify and address environmental and social risks and impacts, those involving Involuntary Resettlement and Indigenous Peoples, and including community health and safety issues, according to AIIB ESS-1. In particular, disclose the draft environmental and social assessment documents (including the ESMP, and, as applicable,

any ESMPF, or other approved forms of documentation) in a timely manner in accordance with paragraph 57 of the ESP, in an accessible place, and in a form and language(s) understandable to affected people and other stakeholders; this includes documentation required under ESS 2 and ESS 3, as applicable. Moreover, in the same manner the final assessment documents, as they become available, and any updates must be disclosed to affected people and other stakeholders. Regularly disclosure of the updated environmental and social information, in the same manner, along with information on any material changes in the Project must be performed according to AIIB requirements.

In this respect, a Grievance Mechanisms is established as a part of the Stakeholder Engagement Plan and Environmental and Social Management System in order to meet the meaningful consultation and other stakeholder engagement requirements.

Key issues included regarding grievance mechanism in AIIB ESS 1 are as follows:

🌿 Environmental Coverage:

- Environmental Risks and Impacts
- Biodiversity Impacts
- Critical Habitats
- Natural Habitats
- Protected Areas
- Sustainability of Land and Water
- Pollution Prevention
- Resource Efficiency
- Climate Change
- Greenhouse Gases

🌿 Social Coverage

- Vulnerable Groups and Discrimination
- Gender
- Land and Natural Resource Access
- Loss of Access to Assets or Resources or Restrictions on Land Use
- Cultural Resources

🌿 Working Conditions and Community Health and Safety

- Safe Working Conditions and Community Health and Safety
- Child Labor and Forced Labor
- Labor Management Relationships in Private Sector Projects
- Building Safety
- Traffic and Road Safety

- Security Personnel

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 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

4.1 Grievance Mechanism

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 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 company 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 Project.

The internal and/or external grievance mechanism process to be followed to resolve the grievances is described in below Figure.

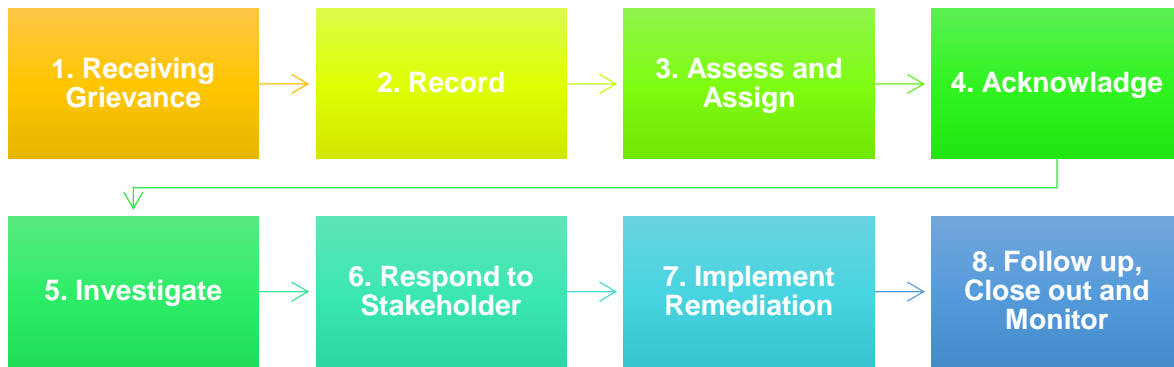


Figure 4-1. Processes of Internal and External Grievance Management

4.1.1 Principles of the 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 working 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.

4.1.2 Grievance Mechanism Communications

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers (Top Management members, Operational Manager, HSE Manager, etc.) should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places and/or in DCC.

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 ULAŞ Food). 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 collaborating other different departments, such as HR, Finance, Corporate Communications, HSE Department and alike.

4.2 Internal (Worker) Grievance Management Process

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments and concerns (See Appendix C). Since the confidentiality of the complainant should be preserved, grievances are collected in grievance boxes which are placed in areas workers can easily access, including dining rooms. Through these forms, workers are also able to make anonymous complaints. Information on how to express complaints, opinions and suggestions to workers will be provided during the induction training process. Written submissions will not be used in any way to intimidate those submitting the complaints.

Management will treat the grievances seriously and take prompt, appropriate actions. "Social Responsibility Staff" will have the main responsibility to collect the complaints. The complaints will be discussed with management in order to gather accurate information about a given complaint. Social Responsibility Staff will process the complaint/concern and provide a resolution. Resolutions of complaints will be developed in accordance with relevant Turkish

laws, regulations, as well as international requirements. Feedback will be provided to those involved.

It is possible to extend the process for the complex grievances and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during solution process. Social Responsibility Staff aims to respond in cooperation with the related department and solve each complaint within 30 calendar days. The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this procedure should be fulfilled.

4.3 External Grievance Management Process

The steps of the grievance management process consist of (i) receiving the grievance, (ii) assessing, (iii) sending acknowledgement, (iv) investigating, (v) feedback to stakeholder, (vi) implementing the remediation activities and (vii) closure.

4.3.1 Receiving Grievances

Grievances are received through all available channels such as phone, mail, grievance forms, websites, contractors and etc. The stakeholder can raise a grievance by filling out the grievance form. Once the form is completed then "Social Responsibility Staff" will process the form according to the grievance mechanism procedure.

Table 4-1. 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.kavukcu grubu.com</p>

The Grievance Register Form (*See Appendix A*) will be used to collect the information about grievances, concerns and the complainant. All grievances will be recorded and collected in the Grievance Database (*See Appendix E*).

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

4.3.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into “Grievance Database” (See *Appendix E*). The Social Responsibility Staff (SRS) investigates the grievance and makes the first evaluation with the help of other related departments. The Project investigates the grievance and involves appropriate departments in its investigation and formulation of a resolution.

The complainant may be contacted (if not anonymous) to gather more information, using the “Consultation Form” (see *Appendix B*). Any correspondence with the Complainant will be recorded in the “Grievance Database”. When final decision is made on grievance, feedback will be given to stakeholder.

4.3.3 Feedback to Stakeholder

Complainants will receive a formal response acknowledging that the Project has received the grievance, within 5 working days of submitting the grievance. Complaints received anonymously will be investigated in the same manner as non-anonymous complaints, but no formal response will be issued.

4.3.4 Proposed Resolution / Corrective Action

Within 30 calendar days of receipt of the grievance, SRS of the Project will formally communicate a proposed resolution or corrective action to the complainant (if not anonymous) and discuss it with the complainant. The complainant will be informed about the methodology followed. All communication will be recorded in the “Grievance Database”.

4.3.5 Closure of Grievances

The grievance procedure of the Project aims to formally close out every grievance within 30 calendar days after receiving it, unless an alternative agreement is made with the complainant. Note that this alternative agreement must be reached within these 30 calendar days. Closure requires the signature of the complainant (if not anonymous) on the Grievance Closure Form (see *Appendix D*), which details the agreed resolution. The signed “Grievance Closure Form” will be recorded in the “Grievance Database”.

4.3.6 Non-Resolution Case

If a grievance cannot be resolved although efforts will be made to solve the concern within the set timeframe, the Project will involve other external experts, neutral parties or local and regional authorities, as necessary and appropriate.

Moreover, an explanation to the complainant about why the grievance cannot be resolved will be given.

5 MONITORING

5.1 Review and Revision of this Procedure

This procedure will be reviewed on minimum annually basis during operation phase. During steady-state operations, this procedure will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs. The revision of this procedure will be the responsibility of the “Social Responsibility Staff” who is the custodian of the procedure.

If material changes to operating procedures are required, the procedure may be updated on an “as required” basis. If there is any revision on this procedure, it will be uploaded to the Document Control Center (DCC) of the Project to ensure that all staff has access to the latest version of this procedure.

5.2 Overview of Monitoring Requirements

In compliance with the Project Standards which is described in Section 3 of this procedure, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

5.3 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 grievance mechanism performance.

Table 5-1. 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 calendar days	100% of the complaints are closed within 30 working days	Grievance Database
Number of visitors to the facilities	All the visitors will be recorded including the information of the reason for visit, etc. and consultation forms will be filled out.	Visitor Records Consultation Forms

KPI	Target	Monitoring Measure
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report

5.4 Key Monitoring Activities

The key monitoring activities are used to assess grievance management and they will focus on ensuring compliance with the requirements set out in this Procedure using the key performance indicators.

Table 5-2. Key Monitoring Activities

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

6 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.

6.1 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 for new employees and refreshment training for all employees. 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.

6.2 Job Specific and Other Training Requirements

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

7 AUDITING AND REPORTING

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

7.1 Internal Auditing

Routine internal inspections will be carried out by Social Responsibility Staff during the operational phase regarding the proper implementation of GMP. 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.

7.2 External Auditing

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

7.3 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 and HSE Manager of the Project 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: /...../.....	Name Surname / Signature of the Person Closing the Complaint
	Name, Surname / Signature of Complainant



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