



# Stakeholder Engagement Plan

Pazarköy Solar Power Plant Project

PREPARED FOR



Fiba Renewables

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# Stakeholder Engagement Plan

## Pazarköy Solar Power Plant Project

0710711

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## ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AoI	Area of Influence
CGM	Community Grievance Mechanism
CLO	Community Liaison Officer
CSO	Civil Society Organization
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ESG	Environmental, Social and Governance
ESIA	Environmental and Social Impact Assessment
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
HSE	Health, Safety and Environmental
IFC	International Finance Corporation
ILO	International Labor Organization
KPI	Key Performance Indicator
LRF	Livelihood Restoration Framework
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
PAPs	Project-Affected-Person
PS	Performance Standard
RFI	Request for Information
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SLO	Social License to Operate
UN	United Nations
UNGPs	United Nations Guiding Principles on Business and Human Rights
WB	World Bank

## 1. INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for FIBA's (or 'the Client') Pazarköy Solar Power Plant ('the Project') that is planned to be built in the Balıkesir Province, Balya District of Türkiye. This SEP is intended to guide information sharing and engagement with the Project's stakeholders in a clear, transparent, and effective manner. Engagement with stakeholders is crucial to establishing their understanding of the Project, its activities, potential risks and impacts, and to also build trust and support for the Project. The SEP will also aid the Client's overall compliance with Turkish legislation and the intended lender's applicable standards.

This SEP is intended for internal usage amongst the Project development team and for Project lenders to understand the Client's protocol for engagement with PAPs and stakeholders. It also includes a comprehensive Grievance Mechanism (GM) with protocols for a Community Grievance Mechanism (CGM), Workforce Grievance Mechanism and Contractor/Subcontractor Grievance Mechanism. This management plan will also be made available to all stakeholders and shall be actively reviewed by the Project team to showcase any Project changes or developments and integrate feedback from stakeholders where possible.

The SEP has also been created prior to the Client's social baseline assessment and evaluation of the Project's Social Impacts in the Social Impact Assessment (SIA). It will help guide engagements with stakeholders and Project-Affected-Persons (PAPs) that can provide information for the social baseline assessment and SIA.

### 1.1 SEP PRINCIPLES AND OBJECTIVES

This SEP has been established around the key principles of stakeholder engagement as defined by the International Finance Corporation (IFC) Performance Standards (PSs)- namely Performance Standard (PS) 1. The key principles are as follows:

- **Open and transparent engagement:** the Client shall establish open, honest, fact-based, and transparent engagement with Project stakeholders throughout the entire Project life cycle.
- **Listening and dialogue:** engagement efforts must show that stakeholder concerns are heard and addressed in a clear, fair, and appropriate manner.
- **Active participation:** engagement activities shall be inclusive and accessible to all stakeholders (including vulnerable persons/groups) to promote active and meaningful engagement.
- **Proactive and timely engagement:** the client shall proactively initiate engagement so as to ensure that information is shared and concerns are addressed in a timely manner; failure to do so may allow issues to unintentionally scale, therefore having potentially adverse consequences in terms of managing social risks and impacts of the Project.
- **Safe participation:** all stakeholders shall feel safe enough to be able to engage with Project proponents and share their concerns without fear of persecution or risk of retaliation. This includes ensuring that private space can be provided where possible or necessary.
- **Appropriate form of engagement:** all communication shall be culturally appropriate, understandable to local stakeholders and effective overall.

- **Empowering and responsive:** the Client's team shall collaborate with stakeholders as equals with active dialogue to establish the best solutions that include compromise or meet common interests. It is crucial that engagement is not discursive to stakeholders and PAPs.
- **Respectful:** all stakeholders and their opinions and interests shall be treated with respect throughout all engagement efforts.

This SEP intends to be clear, consistent, comprehensive, appropriate, inclusive, and accessible guidance in line with the aforementioned principles, lender requirements and Turkish national legislation. The primary objectives of this SEP are to:

- Identify, map, and analyze stakeholders that are: (i) affected or likely to be affected (either directly or indirectly) by the Project during all stages of its lifecycle (planning through decommissioning); or (ii) those that may have an interest in the Project so as to ensure that they are included in the communication process.
- Determine potential stakeholder related risks to the Project and consider appropriate measures to manage or mitigate them.
- Create protocols to keep stakeholders appropriately and meaningfully engaged throughout the Project lifetime.
- Describe the process that stakeholders shall share their comments, feedback, ask questions and raise grievances and the corresponding or relative protocols in which the Client shall consider perspectives and information.
- Establish provisions for stakeholder feedback integration into Project development as much as possible.

The Grievance Mechanism in Section 0 will help guide the process of managing and responding to stakeholder (internal and external) concerns. The Client will manage and maintain this GM according to the stipulated process throughout the entire Project life cycle.

The SEP also specifies organizational capacities necessary to ensure the proper implementation of this SEP and management of all engagement activities. This includes an overview of the scope of roles and responsibilities, specification on documentation, monitoring, reporting, and evaluation related to the engagement activities.

## 1.2 STRUCTURE OF THE SEP

The remainder of this SEP is structured as follows:

- Section 2, Project Description
- Section 3, Regulatory Context
- Section 4, Preliminary Stakeholder Identification, Mapping and Analysis
- Section 5, Stakeholder Engagement Program and Approach
- Section 6, Grievance Mechanism
- Section 7, Roles and Responsibilities
- Section 8, Documentation, Monitoring, and Reporting

This SEP also includes the following annexes:

- Appendix A: Stakeholder Register Template - Engagement Log
- Appendix B: Grievance Register
- Appendix C: Grievance Form



## 2. PROJECT OVERVIEW

### 2.1 BRIEF PROJECT DESCRIPTION

Pazarköy Solar Power Plant Project (hereafter “the Project”) has a total installed capacity of 31.19 MWm / 31.19 MWe and is located in Balıkesir Province, Balya District. The Project will act as an auxiliary source of the existing 45.6 MWm / 44.00 MWe Pazarköy Wind Power Plant Project. In total, the capacity will be 76.79 MWm / 44.00 MWe.

The Project consists of 2 different polygons which are shown in Figure 2-1. In the figure, the blue lines represent the license area, T1-T12 represents the existing wind turbines and GES1-GES2 represents the planned solar power plant areas.

The general layout and main access to the Project area is shown in Figure 2-2. Access to the Project will be carried via already existing roads and no new access roads are planned and no access road improvements have been envisaged as part of the Project.

Two internal access roads will be designed and constructed inside the Project area. These internal access roads with distances of 600 m and 90 m will be constructed between GES1 and existing road and GES2 and existing road respectively.

There will not be any overhead energy transmission line planned to be established within the scope of the Project. There will only be an underground energy transmission line which will be constructed adjacent to newly planned internal access road. The length of underground energy transmission lines and locations are presented in Table 2-1.

**TABLE 2-1 LENGTH OF ENERGY TRANSMISSION LINE**

No	Length (m)	Location
1	600	Between GES1 and existing road
2	90	Between GES2 and existing road



FIGURE 2-1 PROJECT LAYOUT



FIGURE 2-2 PROJECT LOCATION MAP

## 2.2 PROJECT PARTIES

The parties involved in the Project are listed in Table 2-2 below.

**TABLE 2-2 PROJECT PARTIES**

<b>Role</b>	<b>Entity</b>
Project Owner	Fiba Yenilenebilir Enerji Holding A.Ş.
Special Purpose Vehicle (SPV)	Tekno Rüzgar Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
Engineering, Procurement, and Construction (EPC Contractor)	SPI Yenilenebilir Enerji A.Ş.
Primary Panel Supplier	Schmid Pekintaş Güneş Enerji Sistemleri San. ve Tic. A.Ş.
ERM GmbH	Independent international E&S consulting firm hired by Kavram
IFC	Financial Lender

## 2.3 LOCATION AND LAND REQUIREMENTS

The total project area is expected to be 249,843.80 m<sup>2</sup> (24.98 ha). It is located in the Havutbaşı Village, of the district of Balya in the Balıkesir province. The closest settlements to the Project area are Havutbaşı Village which is about 1.3 km from the GES-1 polygon and Balya District which is about 10 km.



FIGURE 2-3 PROJECT LOCATION

The land areas for the proposed Solar Plant are fragmented and independent from each other as seen in Figure 2-1. The Project area spans over forest, agricultural, and rural settlement areas, as well as a highway.

The Client states that animals will still be able to pass between Project areas, access privately held pastures, and forest clearings around the Havutbaşı District will be provided. There are open and uncultivated areas that are suitable for animal breeding around the Project area and Havutbaşı.

The Client confirms that all land required for the construction development of this Project is privately owned. However, based on the definitions and requirements of IFC PS 5, there may be the potential resettlement of land users. This will be determined and updated during/after the completion of a detailed social baseline and SIA and findings from the locally engaged resettlement expert.

Land owners/users will need to be kept apprised of development associated with the project, have access to grievance mechanisms etc.

### 3. REGULATORY CONTEXT

This SEP will be maintained, adjusted, and implemented in line with the following national and international standards and requirements. Where there is discrepancy between requirements, the Client shall follow the more stringent recommendations and requirements.

## 3.1 APPLICABLE NATIONAL STANDARDS

The most relevant national standards for this Project's stakeholder engagement are:

- The Constitution of the Republic of Türkiye
- Turkish Civil Code
- The Law on the Right to Information
- The Law on the Right to Petition
- Turkish Expropriation Law
- And Turkish Environmental Law.

### 3.1.1 THE CONSTITUTION OF THE REPUBLIC OF TÜRKIYE

The Constitution of the Republic of Türkiye is the main national legislation that will guide the implementation and maintenance of this SEP.

#### 3.1.1.1 ARTICLE 25 FREEDOM OF THOUGHT AND OPINION

Article 25 of the constitution maintains that everyone is entitled to have their own thoughts and opinions without being compelled to reveal such information for any specific reason or purpose. Furthermore, no person shall be blamed or condemned for any thoughts or opinions.

#### 3.1.1.2 ARTICLE 26 FREEDOM OF EXPRESSION AND DISSEMINATION OF THOUGHT

Article 26 of the constitution stipulates that all people are entitled to the right to express and share their thoughts or opinions verbally in writing, in other media (i.e. images), individually and/or collectively. This also includes the right to receive or share information or ideas without authorities intervening. No person shall be blamed or condemned for expressing and/or disseminating thoughts or opinions.

#### 3.1.1.3 ARTICLE 56 HEALTH, THE ENVIRONMENT AND HOUSING

The Constitution states that everyone has the right to live in a health and balanced environment in Article 56. State and citizens are responsible to improve the natural environment, to protect environmental health and prevent pollution.

#### 3.1.1.4 ARTICLE 63 CONSERVATION OF HISTORICAL, CULTURAL, AND NATURAL ASSETS

Article 63 maintains that the State shall ensure the protection of any natural, historical, or cultural wealth assets and shall employ promotional and supportive measures to ensure this. Compensation and exemptions may apply depending on the conditions of the private ownership of such assets and are further specified in the law(s).

### 3.1.2 CIVIL CODE

The Turkish Civil Code is laid out in Law No. 4721. This legislation provides information on conditions pertaining to real estate ownership rights and limitations.

### 3.1.3 RIGHT TO INFORMATION LAW

Law No. 4982 is the Turkish law ensuring the Right to Information, which regulates procedures and foundations that are relevant for the right to information. This legislation is underpinned by the principles of a democracy, such as: equality, impartiality, and openness. It states that

all persons enjoy the right to gain information on the activities of public institutions and professional organizations that qualify as public institutions. The law does not consider the right to information regarding activities of other private institutions/actors.

### 3.1.3.1 LAW ON THE RIGHT TO PETITION

The Right to Information Law also references the Right to Petition (Law No. 3071), which citizens are entitled to in accordance with Article 3 of Law No. 4982. This guarantees citizens the Right to Petition, which specifies that Turkish citizens can apply in writing to the Grand National Assembly of the Republic of Türkiye – and other relevant institutions – voicing their concerns, interests, or complaints.

### 3.1.4 EXPROPRIATION LAW

Article 46 of the Turkish Constitution states that the state and public corporations are entitled to expropriate or impose administrative servitude on part of or all of a property area, if compensation is paid in advance and land is privately owned.

Moreover, Law No. 4650, Turkish Expropriation Law further emphasizes that expropriation can only be carried out on immovable assets<sup>1</sup> and compensation for the loss of land and assets shall only be provided to the legal owner (individual or government entity). Other occupants of the land may only be eligible for compensation in particular cases where the title deed is not formally registered, and no person is claiming rights to the immovable assets; village leaders may need to be consulted in these circumstances. Expropriation law does not fully consider customary land users.

A Declaration of Public Interest is necessary for expropriation of any property and shall be approved by the relevant government local authority (usually the governor or relevant ministries). A simple declaration will be provided that formally conveys the initiation of the expropriation process by the authorized executive body.

This Project does have the Declaration of Public Interest for land expropriation to commence.

### 3.1.5 ENVIRONMENTAL LAW

Türkiye's central law pertaining to environmental regulation is Environmental Law No. 2872 (Amended by Law No. 5491). The legislation specifies that the state and its citizens are responsible for protecting the environment and preventing pollution, as the environment is a common asset of all living beings. It is aligned with the core principles of sustainable environmental development.

Moreover, it includes provisions for the completion of Environmental Impact Assessment (regulation no. 29186) or Article 10 of the law. The law requires that the EIA process be disclosed to the public, however it does not include further provisions for stakeholder engagement nor requirements for managing, assessing, and tracking social/socio-economic impacts from the Project.

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<sup>1</sup> State appropriation of movable assets is addressed in the scope of other Turkish laws.

## 3.2 INTERNATIONAL STANDARDS AND GUIDELINES

### 3.2.1 IFC PERFORMANCE STANDARDS

The key international standards that underpin this SEP are the IFC Performance Standards. These are regarded as benchmarks for international good practice for environmental and social risk management in private sector Projects or developments. These standards specify that clients engage with internal and external stakeholders, especially the communities that are affected by the Project via information disclosure, consultation, informed participation, and meaningful negotiations (where necessary), in ways that are relative to the Project's risks and impacts.

IFC PS 1 – the Assessment and Management of Environmental and Social Risks and Impacts – includes Stakeholder Engagement as a central component for managing a project's E&S performance. It encourages and allows Project developers to develop strong, constructive, and responsive relationships with Affected Communities and other interested parties to more effectively manage any potential social risks and impacts. Moreover, it helps ensure that many easily overlooked rights on behalf of the local communities and Affected Persons are protected and respected. Stakeholder Engagement is also cross-referenced by most of the other PSs, emphasizing the multidisciplinary nature of the IFC PS and proper E&S management.

More specifically, it is imperative that the Client engage with communities and stakeholders as early on in the Project as possible and throughout the entire Project lifecycle to ensure that all risks and impacts are properly managed and not exacerbated. This includes engagement during planning and decommissioning.

The key requirements for proper Stakeholder Engagement as per PS 1 are listed below:

- **Stakeholder Analysis and Engagement Planning:** engagement shall be on-going and open, and typically will include a stakeholder mapping and analysis to cater engagements to relative interest and influence levels; engagement shall include proper dissemination of Project information, consultation with and participation from stakeholders, creation and management of an effective grievance mechanism, and on-going reporting efforts regarding Project development to stakeholders.
- **Disclosure of Information:** Project information shall be provided to stakeholders in a timely and appropriate manner and be relevant to their needs and interests relative to the Project. More specifically, this information shall explicitly highlight the purpose, nature, scale, and anticipated degree of impacts of the Project, duration of activities, potential risks to stakeholders, engagement approach and planned activities, proposed mitigation measures, and protocols for grievance submissions and management.
- **Consultation:** stakeholder consultations shall involve active and two-sided dialogue in which all parties feel respected and comfortable to participate in a manner that is meaningful and effective; the extent of consultations shall be relative to Project impacts and begin early enough to allow stakeholders to have necessary Project information that may influence or inform their thought process and decision-making; engagements shall be free of coercion, manipulation and also be well-documented to ensure transparency.
- **Informed Consultation and Participation:** is needed when a Project may have significant adverse impacts on affected stakeholders. Consultation and participation entail a meaningful and active exchange of views and information with good-faith-negotiations.



The Project proponents should integrate perceptions from these exchanges and decision-making views into Project planning. This process must be documented to minimize and avoid negative risks and impacts and stakeholders shall be informed on the extent to which their concerns have been considered.

- **External Communications:** the Project developer shall establish systematic protocols to hold them accountable for external communication to stakeholders and other members of the public. This would include, but is not limited to receiving and registering stakeholder/public exchanges, addressing issues and concerns, tracking and documenting responses, adjusting activities or management programs accordingly etc. The client shall share Project documentation and reports to the public and stakeholders as much as possible.
- **Grievance Mechanism for Affected Stakeholders:** the GM must be scaled to the relative risks and potentially adverse impacts of the Project and be uniquely designed for PAPs use. This tool will help resolve stakeholders' conflicts and concerns, especially pertaining to the Client's environmental and social performance.
- **On-going Reporting to Affected Stakeholders:** Transparency is extremely valuable to maintaining social buy in or social license to operate (SLO) and the Client shall prioritize on-going reporting to affected stakeholders regarding Project developments as much as possible. Reporting efforts should namely include how issues raised in consultations or via grievance mechanisms have been handled and keep stakeholder up to date on the expected Project risks and impacts that may directly or indirectly affect them. Management plans and further documentation shall also be shared.

Additional requirements exist when indigenous people are included amongst the Project's Affected Communities, in which case IFC PS7 (*Indigenous Peoples*) would be triggered. However, there are no identified indigenous people within this Project area and thus, this will not be included in the scope of this report.

### 3.2.2 OTHER RELEVANT STANDARDS

Other relevant standards to consider are:

- International Labor Organization (ILO) Core Conventions pertaining to labor standards and conditions of employment;
- United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs);
- Any international treaties and conventions relating to the environment and social performance that the host country has ratified or is part of;

## 3.3 SUMMARY OF REQUIREMENTS

The previously mentioned standards and legislation require that Project developers abide by these key points throughout their engagements with local communities and all other stakeholders:

- Identify and analyze stakeholder in order to properly tailor communication to their needs, interest, and influence;
- Create a plan that will be used to engage stakeholders about the Project in an effective manner;

- Share and disclose relevant Project information to allow for participants to be informed and actively participate during consultations;
- Ensure that information disclosure and consultation practices (relative to the Project needs and activities) are occurring throughout the entire Project life cycle and that this SEP is properly maintained and managed throughout.
- Create a suitable grievance mechanism for stakeholders that is appropriate and accessible to the local context;
- Designate the proper organizational capacity for SEP implementation, namely ensuring that a specific person is responsible for implementing and managing this SEP and grievance activities;
- Ensure that the Project owner plays an active and lead role in ensuring that information disclosure and engagement efforts are meaningful, adequate, and effective.

## 4. STAKEHOLDER IDENTIFICATION, MAPPING, AND ANALYSIS

Stakeholders are any individuals or groups (organized or unorganized) that can be impacted by or influence the Project. Impacts and influence(s) may be positive, negative, direct, indirect, or induced. The scope of stakeholders factored into the mapping and analysis depends on the complexity of the Project and study area.

### 4.1 PRELIMINARY STAKEHOLDER IDENTIFICATION

At this point in time there is only sufficient information for an identification of stakeholder groups, or a preliminary and high-level stakeholder identification (Table 4-1 below). The Client will conduct a more detailed stakeholder identification exercise, identifying individuals and contact information in the stakeholder register once preliminary engagements for the social baseline commence.

Identified stakeholders meet at least one of the following requirements:

- Have an interest in the Project;
- May be impacted by the Project or have influence over the Project – impact and influence in this case may be positive, negative, direct and/or indirect; or
- Contribute feedback or opinions on Project issues, concerns, or developments.

TABLE 4-1 STAKEHOLDER CATEGORY LIST

Stakeholder Category/Group	Relationship to the Project	Stakeholders
Central Government Authorities	The Central Government is of primary political importance to the Project in terms of establishing policy and monitoring and enforcing compliance with Turkish Laws throughout all stages of the Project life-cycle.	<ul style="list-style-type: none"> <li>• Ministry of Energy and Natural Resources</li> <li>• General Directorate of Mining and Petroleum Affairs</li> <li>• Ministry of Agriculture and Forestry</li> <li>• General Directorate of Nature Conservation and National Parks</li> <li>• General Directorate of Forestry</li> </ul>

		<ul style="list-style-type: none"> <li>• General directorate of State Hydraulic works (DSI)</li> <li>• Ministry of Culture and tourism</li> <li>• Balıkesir cultural Heritage Preservation Regional Board Directorate</li> <li>• Ministry of Environment, Urbanization and climate Change, Spatial Planning General Directorate</li> <li>• Ministry of Environment, Urbanization and Climate Change, Protection of Natural Assets General Directorate</li> <li>• Ministry of Health</li> </ul>
Local Government	<p>The Local Government is of importance to the Project as it is responsible for the decisions on environmental conditions and permits as well as the implementation of legislation, and development plans and policies at a local level.</p> <p>The local Government needs to be engaged to maintain a direct line of communication, identify important issues which may impact the Project, and ensure social support.</p>	<ul style="list-style-type: none"> <li>• Balıkesir Governorship</li> <li>• Balıkesir Municipal Government</li> <li>• Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>• Provincial Disaster and Emergency Directorate</li> <li>• Provincial Directorate of Forestry and Agriculture</li> </ul>
Local Institution/Public Service Providers	<p>Local public services including administration and utility supply related stakeholders that potentially may be directly or indirectly affected by the Project activities or the Project's associated environmental and social impacts</p>	<ul style="list-style-type: none"> <li>• Emergency response (firefighters, paramedics, police departments etc.)</li> <li>• Local enterprises (hospitality, construction, energy/heating companies and distributors etc.)</li> <li>• Environmental Institutions (Natural Life Protection Association; Environment Foundation of Türkiye; Human Rights Association (IHD); Türkiye Environmental Protection and Greening Agency (TÜRÇEK))</li> </ul>
Potentially Affected Groups/Communities	<p>Communities may be directly or indirectly affected by the proposed Project and its activities. Some groups could express their negative opinions on Projects of similar nature.</p> <p>These communities need to be made aware of the Project's schedule and its planned activities as well as of the potential benefits that will come in the form of economic opportunities and employment.</p>	<ul style="list-style-type: none"> <li>• Local community(s)</li> <li>• Mukhtars (village leaders)</li> <li>• Land owners and users</li> <li>• Residents in the Province of Balıkesir</li> <li>• Residents of Balya District</li> <li>• Residents of Havutbaşı Village</li> <li>• Opinion leaders (i.e. prominent individuals from the region such as celebrities)</li> </ul>
Vulnerable Groups	<p>Potentially vulnerable groups are those groups that are more likely to be less resilient to adverse impacts of a major project than the general population. This may be due to specific</p>	<ul style="list-style-type: none"> <li>• Women</li> <li>• Children</li> <li>• Elderly/retired persons</li> <li>• Illiterate persons</li> </ul>

	<p>characteristics of the individuals or groups (such as gender, age, ethnicity, or disability), or may result from a broader range of factors (such as dependence on natural resources, lower access to employment and/or other benefits of the Project). Due to their nature, they may be highly impacted by the Project but will have low influence.</p>	<ul style="list-style-type: none"> <li>• Mentally or physically disabled or chronically ill-persons</li> <li>• Asylum seekers</li> <li>• Migrant workers</li> <li>• Low-income households</li> </ul>
NGOs/CSOs	<p>Organizations with direct interest in the Project, and its social and environmental aspects can influence the Project directly or through public opinion. Such organizations may also have useful data and insights on areas of interest to the Project. Moreover, engagement may produce benefits in terms of expanding awareness about the Project.</p> <p>These stakeholders are already or may potentially become partners to the Project in areas of common interest.</p>	<ul style="list-style-type: none"> <li>• Environmental and Human Rights Organizations (Greenpeace; Erosion Control and Reforestation Foundation for the Protection of Natural Wealth (TEMA); Foundation for the Protection and Promotion of Environmental and Cultural Values (ÇEKÜL9; Environment Volunteers Association (ÇEVKO))</li> </ul>
Academic Institutions	<p>Educational institutions and individuals with direct interest in the Project, and its social and environmental aspects and that are able to influence the Project directly or through public opinion. Such organizations may also have useful data and insight and may be able to become partners to the Project in areas of common interest. Potential partners' interests lie in the provision of services and supplies to the Project.</p>	<ul style="list-style-type: none"> <li>• Staff and students at Balıkesir University</li> <li>• Research organizations (Environmental Protection and Research Foundation (ÇEVKOR); Turkish Environmental Education Association (TÜRÇEV)</li> <li>• Other schools within the AoI</li> </ul>
Media	<p>Local, regional and national level media may influence local stakeholders' perceptions of the Project.</p>	<ul style="list-style-type: none"> <li>• Local radio stations</li> <li>• News stations/channels</li> <li>• Local TV networks</li> <li>• Newspapers and magazines</li> <li>• Local websites</li> </ul>
Internal Stakeholders	<p>Internal stakeholders include people involved in the Project, mainly employees, contractors and supply chain workers. These stakeholders will be impacted by the Project. Furthermore, these stakeholders may be in direct contact with local communities due to their presence in the area.</p>	<ul style="list-style-type: none"> <li>• Shareholders</li> <li>• Employees at Fiba Renewables</li> <li>• Contractors/subcontractors</li> <li>• Potential lenders</li> <li>• Supply chain workers</li> </ul>

Source: ERM, 2024

As the Project develops the Client will update the stakeholder identification exercise and stakeholder Register relative to any Project changes. A sample Stakeholder Database/Register can be seen in Appendix B of this Report.

## 4.2 STAKEHOLDER MAPPING AND ANALYSIS

This section explains the value of stakeholder mapping and subsequently provides a preliminary, high-level mapping of identified stakeholder groups. The Client will update this section once more specificity regarding particular stakeholders is obtained.

### 4.2.1 APPROACH AND PURPOSE OF MAPPING

AFTER STAKEHOLDERS ARE IDENTIFIED THEY WILL BE MAPPED ACCORDING TO INFLUENCE AND IMPORTANCE AS SHOWN IN

Figure 4-1 Stakeholder Priority Matrix. Influence on, interest in, and impact on the Project are all ranked from low-high.

<b>Influence</b>	<b>H</b>	Involve	Collaborate	Collaborate
	<b>M</b>	Involve	Involve	Collaborate
	<b>L</b>	Inform	Consult	Consult
		<b>L</b>	<b>M</b>	<b>H</b>
		<b>Interest</b>		

FIGURE 4-1 STAKEHOLDER PRIORITY MATRIX

Source: ERM, 2022

Stakeholder mapping is required to develop strategic, effective and systematic engagement efforts with stakeholders. Understanding how various levels of influence and interests amongst and between stakeholders/stakeholder groups helps tailor particular engagement activities to their informational and personal needs. Influence, impact, and interest levels differ with each Project and stakeholder group.

Influence refers to the power that the stakeholders have relative to decisions that may affect the Project or are made by Project developers. Stakeholders may have some degree of control over the decision-making process, even if only in informal ways – protesting the Project or seeking to prevent Project operations from continuing. Influence alone is insufficient to prioritize engagement with stakeholders as those with lower levels of influence may sometimes be the most vulnerable and severely impacted, and thus may require additional attention throughout engagement efforts. Stakeholders with high levels of influence are likely to be government officials and local ministries involved in permitting and consenting processes, whereas academic institutions may have low influence.

Moreover, interests are largely shaped by the scale and nature of potential impacts to a stakeholder/stakeholder group. Those adversely affected or negatively impacted by Project activities are likely to have a higher level of interest in the Project; however, those receiving immense Project benefits may also have a high level of interest. Impacts to stakeholders may be direct or indirect and can be environmental, socio-economic or cultural.

Thus, based on the ranking outcomes from the matrix different levels of engagement will be planned and carried out depending on the stakeholder group. There will still be general engagement efforts that may be relevant to all stakeholders, but other engagement efforts such as compensation consultations pertaining to displacement or resettlement would only be proposed for a select group of stakeholders.

### 4.2.2 PRELIMINARY HIGH-LEVEL MAPPING

Figure 4-2 below provides a preliminary high-level stakeholder mapping.

<b>Influence</b>	<b>H</b>	Local politicians	Internal Stakeholders, Shareholders, and Employees	Local Governments, Regulatory and Permitting Authorities
	<b>M</b>	NGOs/CSO	Media; Internal Suppliers; Contractors	PAPs/Local Residents within/around AoI
	<b>L</b>	Academic Institutions	Other local residents of nearby towns;	Vulnerable groups; PAPs/Local Residents within/around AoI
		<b>L</b>	<b>M</b>	<b>H</b>
				<b>Interest</b>

**FIGURE 4-2 PRELIMINARY STAKEHOLDER MAPPING**

Source: ERM, 2024

Monitoring will be extended to all engagement activities regardless of group interests and influence, to ensure that engagement is appropriate with any developments or changes to the Project. Most engagement activities with consultation and collaboration measures will be extended to local governments, regulatory authorities, local citizens (specifically those within and closest to the AoI), and PAPs.

The Client will update this matrix/mapping in a more detailed manner and adjust as needed relative to the complexity and scale of Project activities and impacts. Depending on the findings of the social baseline and SIA, and complex land requirements and impacts it may be beneficial for the Client to engage a more complex mapping matrix in their detailed mapping. The ranking scale may need to be expanded or altered to a numerical system and compensation may also need to be added as an engagement action/objective. Stakeholder positions and status may change over time, as the Project progresses, and new stakeholders may need to be added to planning and engagement efforts.

### 4.3 CONSIDERATIONS FOR VULNERABLE GROUPS

IFC PS1 requires that during stakeholder identification the client shall also note individuals or groups who may be disadvantaged or vulnerable. Vulnerable groups and persons are often the most marginalized with the least adaptive capacities to respond to adverse issues; they typically may have distinct concerns or interests in the Project from other stakeholders and

groups and may even require different forms of engagement. Vulnerability typically stems from individual or group characteristics (age, gender, race, disability, etc.) or broader range of factors (systemic discrimination, dependency on natural resources, financial insecurity, lack of literacy, political persecution/risk etc.).

In other words, they may be subject to Project impacts and risks of high severity but have limited influence to alter or combat such adverse outcomes. Therefore, Inclusive stakeholder engagement is needed to properly support such stakeholders in a fitting way and to prevent further exclusion and marginalization of or harm to vulnerable stakeholders.

Vulnerable persons and groups typically include, but are not limited to:

- Women,
- Children,
- The elderly or retired,
- Asylum seekers and migrant workers,
- Low-income households,
- Persons with illnesses or disabilities, and
- Indigenous persons or those who practice traditional livelihoods etc.

Throughout their planning and engagement with stakeholders, the Client will actively consider and integrate the needs and interests of vulnerable persons and groups into Project activities. Project planning and efforts will also be gender inclusive and provide needed resources to handle sensitive issues. During the completion of a comprehensive social baseline and SIA, the client shall assess the level of risk and severity of adverse impacts that Project activities may inflict on vulnerable stakeholders. Those findings shall be integrated into the approach for stakeholder engagement and specific activities, as needed, so as to ensure an effective stakeholder engagement plan (and grievance mechanism) that is tailored to all stakeholder needs and interests.

The Client's efforts may include, but not be limited to:

- Requiring that Project proponents, especially those on the stakeholder engagement/management side (such as the CLO), are properly trained and have sufficient materials to handle gender-specific or sensitive issues in an appropriate and meaningful way;
- Representation of a vulnerable groups and women shall be ensured in all engagement activities;
- The Client will be open to other suggestions from their stakeholders to address concerns in a way that is most suitable to their needs and experiences;
- The Client shall create designated 'safe/private spaces' (if needed) for vulnerable persons to freely share their experiences and concerns. This can be done by facilitating one-on-one or female-only discussions depending on the circumstances.
- Allowing any grievances to be submitted anonymously and have anonymity respected and preserved; and
- Engagement with civil society organizations that can help provide input, a forum or other avenues for optimal engagement with specific groups.

## 5. STAKEHOLDER ENGAGEMENT PROGRAM AND APPROACH

This section provides a high-level overview of the approach for stakeholder engagement.

### 5.1 ENGAGEMENT TO DATE

The only stakeholder engagement that the Client has conducted to date is the EIA disclosure as per Article 9 of the Turkish EIA Law. The Client announced the Project in a national newspaper on 24.01.2022 and in a local provincial newspaper on 24.01.2022 as pictured in Figure 5-1 and Figure 5-2 below.

DUYURU ÇED Sürecine Halkın Katılımı Toplantısı	DUYURU ÇED Sürecine Halkın Katılımı Toplantısı	
<p>Tekno Rüzgar Enerji Yatırım Üretim ve Tic. A.Ş. tarafından Balıkesir İl, Balıya İlçesi, Havutbaşı Mahallesi Merkezi "45,6 MWm/44 MWe PAZAR-KÖY RÜZGAR ENERJİ SANTRALİNE YARDIMCI KAYNAK GÜNEŞ ENERJİ SANTRALİ (YARDIMCI KAYNAK KAPASİTESİ: 31.1958 MWm/31.1958 MWe, TOPLAM TESİS KAPASİTESİ: 76.7958 MWm/44 MWe)" projesinin yapılması planlanmaktadır. Söz konusu proje için Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliğinin 9. Maddesi gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili bilgi edinmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" düzenlenecektir.</p> <p>Halkımıza saygılı duyurudur.</p> <p><b>Toplantı Yeri</b> : Havutbaşı Mahallesi Köy Katresi  <b>Toplantı Yerinin Adresi</b> : Balıkesir İl, Balıya İlçesi  <b>Toplantı Tarihi</b> : 04.02.2022  <b>Toplantı Saati</b> : 10:30  <b>Proje Sahibi</b> : Tekno Rüzgar Enerji Yatırım Üretim ve Tic. A.Ş.  <b>Proje Sahibi Adresi</b> : Akınizade Mah. Kaşlı Cad. Sarıyusuken Ak İş Merkezi NO:4-2/7 Üsküdar / İSTANBUL</p> <p><b>Tel</b> : +90 216 554 54 00  <b>Fax</b> : +90 216 474 52 52</p> <p><b>ÇED Raporunu Hazırlayan Kuruluş:</b> DE Planlama İnşaat Danışmanlık Mühendislik San. ve Tic. Ltd. Şti.  <b>ÇED Raporunu Hazırlayan Kuruluşu Adresi:</b> Evka-3 Mah. 119/7 sok. No:12 Bornova /İZMİR</p> <p><b>Tel</b> : 0 232 375 91 54  <b>Fax</b> : 0 232 375 92 36</p> <p>Resmi İlanlar <a href="http://www.ilan.gov.tr">www.ilan.gov.tr</a>'de (Basın: 1540652)</p>	<p>MANRES Elektrik Üretim A.Ş. tarafından Balıkesir İl, Manyas İlçesi, Yayla Mahallesi Merkezi "20,7500 MWm/20,0000 MWe GÜNAYDIN RÜZGAR ENERJİ SANTRALİNE YARDIMCI KAYNAK GÜNEŞ ENERJİ SANTRALİ (YARDIMCI KAYNAK KAPASİTESİ: 19.9830 MWm/19.9830 MWe, TOPLAM TESİS KAPASİTESİ: 40.7330 MWm/20.0000 MWe)" projesinin yapılması planlanmaktadır. Söz konusu proje için Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliğinin 9. Maddesi gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili bilgi edinmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" düzenlenecektir.</p> <p>Halkımıza saygılı duyurudur.</p> <p><b>Toplantı Yeri</b> : Yayla Mahallesi Toplantı Salonu  <b>Toplantı Yerinin Adresi</b> : Balıkesir İl, Manyas İlçesi  <b>Toplantı Tarihi</b> : 04.02.2022  <b>Toplantı Saati</b> : 14:00  <b>Proje Sahibi</b> : Manres Elektrik Üretim A.Ş.  <b>Proje Sahibi Adresi</b> : Kireli Cad. Sarıyusuken Ak İş Merkezi NO:4 K:1 / A BLOK Üsküdar / İSTANBUL</p> <p><b>Tel</b> : +90 216 554 54 00  <b>Fax</b> : +90 216 474 52 52</p> <p><b>ÇED Raporunu Hazırlayan Kuruluş:</b> DE Planlama İnşaat Danışmanlık Mühendislik San. ve Tic. Ltd. Şti.  <b>ÇED Raporunu Hazırlayan Kuruluşu Adresi:</b> Evka-3 Mah. 119/7 sok. No:12 Bornova /İZMİR</p> <p><b>Tel</b> : 0 232 375 91 54  <b>Fax</b> : 0 232 375 92 36</p> <p>Resmi İlanlar <a href="http://www.ilan.gov.tr">www.ilan.gov.tr</a>'de (Basın: 1540664)</p>	<p><b>Çıldır Gölü'nde festival öncesi buz kalınlığı ölçüldü</b></p> <p>Doğu Anadolu'da kış turizminin önemli merkezlerinden Çıldır Gölü'nde, bu yıl 7.ncisi düzenlenecek "Altın At Kristal Buz Festivali" öncesi hazırlıklar sürüyor. Arslanhan ve Kars arasında yer alan, soğuk havanın etkisiyle vizesi buz tutan Çıldır Gölü, 7. kez festivale ev sahipliği yapacak. Her yıl yüzeyinin buzla kaplanmasıyla yerli ve yabancı turistlerin aklı gezinti yaptığı, Eskimo usulü balıkçılığın yapıldığı gölde, festival sırasında olumsuzluğun yaşanmaması için buzun kalınlığı ölçüldü. Çıldır Gölü'nün Arslanhan tarafındaki tesisler mevkiine gelen Afet ve Acil Durum B.Müdürlüğü (AFAD) ekipleri, üzerindeki karları temizledikleri buz kütlesini motorlu testere yardımıyla kesti. Uzun uğraşlar sonucu belli bölgede kesilen buzun kalınlığı, ekiplerce ölçülerek kayıt altına alındı. <b>AA</b></p>

FIGURE 5-1 PROJECT ADVERTISEMENT IN NATIONAL NEWSPAPER

Source: Local EIA, 2022





FIGURE 5-2 PROJECT ADVERTISEMENT IN LOCAL NEWSPAPER

Source: Local EIA, 2022

Moreover, the EIA states that there was a public Participation Meeting at 10:30 on 04.02.2022 at the Havutbağ Village Coffee House in Balya District. This is pictured in Figure 5-3 below.



FIGURE 5-3 PUBLIC PARTICIPATION MEETING (EIA DISCLOSURE)

Source: Fiba Renewables, 2022

The Project team sought to inform locals of the Project's expected activities during construction and operation of the Project via visual presentations on the environmental impacts and suggested mitigation efforts. 15 people attended the meeting, and the Client stated that the meeting minutes, participant lists and meeting minutes were documented electronically. The official Project owners and the company supporting the EIA answered stakeholder concerns such as those pertaining to potential impacts to agricultural land, project ownership structure etc.

## 5.2 FUTURE ENGAGEMENT

Consultations shall commence prior to and during the Client's efforts to conduct a comprehensive social baseline and SIA. The Client will update this SEP after conducting the

social baseline and SIA with a clear and detailed participatory approach relative to the Project's adverse risks and impacts to stakeholders.

Stakeholders will be consulted regarding the following matters (at a minimum):

- Baseline data collection for the SIA (including household and socio-economic surveys and social infrastructure mapping);
- Disclosure of the draft SIA;
- Disclosure of the SEP;
- Execution of a census/inventory of PAPs (see Section 4);
- Disclosure and implementation of the Livelihood Restoration Framework (see Section 5.2.1);
- Consultations on issues pertaining to grievances, as needed;
- Monthly check-ins with stakeholders once construction and assembly begin to manage expectations, concerns, gather feedback, and share relevant updates on Project development.

The CLO shall namely be responsible for managing, overseeing, and ensuring that engagement pertaining to the Project is carried out effectively, in an appropriate timeframe and as per the other protocols mentioned in this SEP and IFC PS 1.

### 5.2.1 ENGAGEMENT AS IT PERTAINS TO PS5

Due to the Project's large land requirements and gaps between Turkish and IFC engagement requirements and compensation requirements for land acquisition, the Client has already commissioned a resettlement expert to help assess the proper scale, nature, and approach for engagement efforts pertaining to IFC PS5. While the social baseline and SIA are currently being prepared, the local resettlement expert is developing a Livelihood Restoration Framework (LRF) as per the requirements of PS5; these plans will provide methods for compensation and engagement for affected persons, relative to the scale and severity of their losses or impacts. Moreover, it will also include a local labor procurement strategy amongst other methods to maximize the Project's positive opportunities. This SEP will be updated with defined engagement efforts with PAPs, and vulnerable persons as recommended by the LRF.

The following engagement efforts will be carried out to mitigate and manage impacts related to land acquisition and livelihoods:

- Socio-economic baseline;
- Census/Inventory of PAPs;
- Disclosure and implementation of the LRF;
- And Consultations on issues pertaining to grievances related to PS5.

The Project developers will expand their organizational capacity for SEP implementation by hiring a Community Liaison Officer (CLO) to facilitate and manage community engagement.

Moreover, it is imperative that engagements with PAPs be in good faith and is meaningful; takes place throughout the planning, implementation, monitoring and evaluation of the land acquisition and resettlement process (including livelihood improvement or restoration); engages all relevant affected groups (men, women, children, elderly, and vulnerable

groups/persons); and is well documented. All stakeholders shall be aware and informed of their entitlements, rights, opportunities and benefits and the client shall facilitate engagement efforts that are simple, practical, accurate and provide culturally appropriate documentation.<sup>2</sup> Module three of the IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement will serve as a basis for developing relevant and appropriate engagement activities with relevant stakeholders.<sup>3</sup>

### 5.3 PARTICIPATION ACTIVITIES

The Client may use the following types of engagement throughout the Project, depending on their relevance:

- Public participation events;
- Multilateral or bilateral meetings;
- Workshops and seminars;
- Focus group discussions;
- Round table meetings and/or Q&A Sessions;
- Interviews with stakeholders;
- Electronic polling/surveys;
- Social media posts;
- And implementing/maintaining a functioning internal/external complaint mechanism.

### 5.4 STAKEHOLDER ENGAGEMENT ACTION PLAN

Table 5-1 below provides a high-level overview of expected engagement activities with their corresponding objectives, format of engagement and which key stakeholders the engagement is directed at. The action plan specifies the timing and frequency of key engagement efforts throughout the remainder of the Project's lifetime.

This overview will serve as a guideline for key engagement activities but shall be adjusted accordingly as the Project develops. The action plan is a key element for the Project developer's periodic review, along with other planning, documentation, and monitoring material laid out in this SEP.

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<sup>2</sup> Source: IFC (2007), Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, International Finance Corporation, <https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-stakeholderengagement1.pdf>, last retrieved 29 April 2024.

<sup>3</sup> Source: IFC (2023), Good Practice Handbook: Land Acquisition and Involuntary Resettlement, International Finance Corporation, <https://www.ifc.org/content/dam/ifc/doc/2023/ifc-handbook-for-land-acquisition-and-involuntary-resettlement.pdf>, last retrieved 29 April 2024.

TABLE 5-1 STAKEHOLDER ENGAGEMENT ACTION PLAN

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
<b>SIA Disclosure</b>					
SIA Disclosure (dissemination of SIA documentation to the public)	Fulfil international lenders consultation requirements by publicly disclosing (via website) the final draft SIA, NTS, SEP, and associated Project materials.	The SIA, SEP and NTS published in English and Turkish and posted hard copies in the primary government office of the respective municipalities within the AoI  The SIA and related material will also be made available online on Project website	Key stakeholders and Affected Communities in the Social AoI All interested (internal and external) stakeholders	During the ESIA Disclosure period (2024 – timing TBD)	Tekno
Engage with stakeholders on the SIA through in person meetings (interviews/focus groups/open house event or public meeting)	Facilitate understanding about the Project and SIA conclusions, as well as proposed mitigation measures  Solicit feedback on the Project and SIA  Contribute to open and positive relationship with Project stakeholders	Disclosure and feedback through in person meetings with stakeholders met during previous engagement rounds  Physical open house event or public meeting held near Project Area (TBD)  Information about open house/public meeting provided to communities via announcements to stakeholders and	Stakeholders met in the previous engagement rounds, including vulnerable groups and Affected Communities in the Social AoI  Key local community leaders Environmental NGOs  All interested stakeholders, including from the Social AoI, as well as national/international stakeholders and interested parties	During the ESIA Disclosure period (2024 – timing TBD)	Tekno

	Use stakeholder and local input to ensure that identified social impacts are properly evaluated and assessed.	through posts in the Mukhtar office. Timing for these events will be specifically defined so as to maximize participation.			
Summarize stakeholder feedback from disclosure process and integrate stakeholder feedback into the SEP (as needed)	Report on disclosure feedback and integrate it into the Final SIA as appropriate	Preparation and distribution of a summary report on disclosure and how submissions have been considered and addressed	All interested stakeholders	During the ESIA Disclosure period (2024 – timing TBD)	Tekno
<b>Post-SIA/SIA Disclosure</b>					
Meetings with key stakeholders around the employment/training, especially for construction crews and drilling operations	Support local participation in Project employment as much as possible and ensure that working conditions are suitable and efficient	Targeted meetings/focus groups	Project employees	Monthly during the construction and annual during the operation.	Tekno
Ongoing engagement with Affected Communities and key stakeholders	Facilitate collaboration with stakeholders  Collect feedback as indicated in this SEP	Targeted meetings; individual meetings, focus groups	Local communities in the Social AoI  Key local authorities and other stakeholders	Quarterly during the construction.	Tekno
Regular meetings with workers	Check in regarding grievances and grievance mechanism	Targeted meetings, focus groups	Workers (internal stakeholders)	Monthly during the construction and annual during the operation.	Tekno

	Implement mitigation measures with relevance to worker health and safety and labor and working conditions				
Implementation of the LRF and on-going engagement with stakeholders on matters related to IFC PS5	<p>Implement the LRF as per document and IFC PS 5 guidelines</p> <p>Initiate and carry out engagements related to compensation and resettlement (TBD)</p> <p>Collect and integrate feedback</p> <p>Provide active updates to relevant parties and PAPS</p>	Targeted meetings, focus groups, bilateral negotiations	Local communities in the Social AoI  PAPS  landowners/users	On-going	Tekno
Ongoing disclosure of Project information, including grievance management reporting	Provide updates about the Project and key construction and operation milestones	Project grievance mechanism to update	All interested stakeholders	Quarterly, during the construction period	Tekno

## 5.5 STAKEHOLDER ENGAGEMENT FOR CHANGE MANAGEMENT

The SEP is an open and “living document” meaning that the Client and its Project team must ensure that it is actively reviewed and updated to fit changing Project needs throughout the entire life cycle. Specific measures related to stakeholder engagement, the grievance mechanism(s) and grievances, stakeholder issues, organizational capacities etc. should be of particular focus during review, evaluation, and reporting. The SEP shall ensure that it reflects Project changes, especially any related to or influencing economic and social risks and impacts. These reviews shall take place at least annually.

As Project developments ensue, changes to the SEP may include (but are not limited to):

- Changes to Project scale, scope, size;
- Adjustments to organizational capacities, such as roles and responsibilities;
- Changes to approaches or materials, such as technology used for the Project or strategies;
- And the scale, nature, and severity of certain social risks and impacts may be different or develop differently than anticipated and their evaluations, management, and mitigation efforts may need to be adjusted accordingly.

Moreover, any changes to the Project development team, especially those working on implementing the SEP and facilitating engagement activities with stakeholders, will also be relayed to stakeholders in an appropriate timeframe. Any developments that the Client is unable to mitigate will be considered significant and will be subject to lender notice. Lenders will also be notified of any changes to Project scope, design, or activities that could potentially impact environmental and social impacts.

## 6. GRIEVANCE MECHANISM

This section establishes the protocols for stakeholders to submit grievances or concerns and for the Client's Project team to maintain and manage the grievance mechanism. The grievance is crucial for maintaining Project-related grievances, especially any issues or concerns related to the Project's environmental and social impacts.

Section 6.2 describes how the Community Grievance Mechanism (CGM) will function, this is mainly directed for stakeholders that are part of the local communities, are considered Project-Affected-Persons (PAPs), and are within the Project's direct and indirect social Area of Influence (AoI); Section 6.1.2 expands upon the workforce grievance mechanism that will be used primarily during the construction phase by construction workers; Section 6.1.3 provides the approach for managing grievances from the Project's contractor and sub-contractors. Other internal employees to the Client's company or Project-team shall manage grievances internally.

This Grievance Mechanism has been developed around the principles and guidelines stipulated in IFC Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts. A grievance refers to any concern or complaint that an individual or group raises relative to Project developments or activities; grievances may stem from real experienced impacts as well as perceived impacts of the Client's actions and intentions. Suggestions, request for information (RFI), reporting of injuries or specific incidents, and stakeholder feedbacks are also considered grievances and will be processed as such.

The Client understands that unexpected impacts can occur throughout the duration of the entire Project and maintaining open, honest, and on-going communication with stakeholders, and an appropriate GM is key to properly managing them. Effective grievance management is also essential to building and maintaining trust and local buy-in over long-term timelines.

### 6.1 PURPOSE AND PRINCIPLES OF A GRIEVANCE MECHANISM

A GM is needed to ensure that stakeholders have adequate avenues to communicate their concerns, complaints, feedback and questions to the Project development team and appropriate protocols for the team to respond to grievances in a *transparent, fair, and systematic manner*.

A proper GM is intended to help ensure that the rights, needs, and liberties of stakeholders is acknowledged and respected, for feedback to be integrated into Project development, and for environmental and social risks and impacts to be managed over a Project's long-term time horizons. Addressing grievances conveys the Project team's respect for stakeholders and their thoughts, interests and experiences; it is ultimately a mitigatory practice that helps prevent issues from becoming exacerbated with further significant consequences. A successful GM will help ease overall engagement with stakeholders for all parties involved.

The following criteria are crucial to ensuring that the GM is successful and effective for the nature, scale and scope of this Project:

- A GM cannot replace judicial or administrative remedies, nor should it be treated as such;
- The Project team will ensure that addressing grievances will be in a prompt, consistent, appropriate, respectful, and timely manner; failure to address concerns in an appropriate time frame may be serious and potentially infringe upon stakeholder rights;



- The GM must be **accessible, open, and receptive to all stakeholders** regardless of their vulnerabilities, status, identity, age, literacy capabilities etc. This also requires that the grievance mechanism have multiple avenues for stakeholders to submit grievances and that they are culturally appropriate formats, languages etc. It is crucial that stakeholders are aware of how and where to find/access the GM and that any changes are explicitly and actively communicated.
- GM shall also **serve the unique needs of and obstacles that vulnerable stakeholders** face; those responsible for handling and managing grievances shall be sensitive to the issues raised by and situations of vulnerable people (i.e. victims of gender based violence or harassment).
- The GM shall be **publicized** so that all stakeholders are actively aware of how to access the GM as needed. The status and developments of grievance resolution shall also be documented and shared with stakeholders.
- A GM shall be both **transparent and confidential**; stakeholders shall be aware of how grievances are managed and receive reporting on key findings, trends, patterns, or changes, yet also have their privacy and anonymity respected and protected. This shall be handled with additional consideration when dealing with sensitive data or situations.
- Stakeholders shall be free of any **manipulation, intimidation, coercion, or retaliation** and bear no cost or retribution related to the GM and its usage.
- The GM must establish clear protocols for the Project team to respond to concerns **indirectly, verbally, or in writing**.
- Compensation and conflict resolution may also need to be provided in some circumstances.
- Grievance resolution shall be **well-documented**.
- Finally, the GM will provide a source of constant learning and improvement for the Project team and its overall environmental and social performance.

A fundamental part of the GM is the maintenance of a well-documented and up-to-date grievance register (see example in Appendix C). The Project team and person(s) directly responsible for grievance oversight and handling will aid by the protocols laid out in this SEP to ensure that actions are consistent and fair. Anonymity shall only be shared with individual consent and discretion.

Moreover, this GM is relevant or applies to all Project components and activities until decommissioning has been completed. It will be reviewed and updated regularly to properly ensure that the GM is relatively adjusted to the scale of any Project changes and developments.

### 6.1.1 COMMUNITY GRIEVANCE MECHANISM

The intended users of the CGM are primarily external stakeholders, including local and nearby communities, PAPs, and other public stakeholders. It is crucial that the community has avenues to submit their concerns and incidents and have them appropriately in place to avoid adverse or exacerbated impacts to local populations.

This is a key requirement under PS1, but also helps manage the social risks and impacts related to: community health, safety, and security (PS 4); land use, land acquisition and resettlement or displacement (PS 5; and cultural heritage assets (PS 8).

### 6.1.2 WORKFORCE GRIEVANCE MECHANISM

The Client is responsible for the implementation, management, and monitoring of all grievances, whether they be from internal or external stakeholders. Therefore, a well-functioning workforce grievance mechanism is crucial to manage potential risks and impacts related to the Project's direct workforce, especially during the construction phase. A proper GM is an embedded mitigation measure that helps decrease and manage the risks and impacts namely related to labor and working conditions and OHS (IFC PS 2 and PS4). This protocol will help deal with incidents such as workplace injuries and harassments, addressing workplace conflicts, and responding to other concerns from the Project's labor pool.

The impacts and issues between the locally Affected Community and Project employees are usually distinct and require slightly different approaches to processing and resolution. Thus, IFC PS2 requires a grievance mechanism for workers to raise and have their workplace concerns addressed. There will be a **separate Grievance Register** for workforce and community grievances but handling of the grievances will proceed in the same manner; it is likely that workforce grievances may be need to be treated as high-risk cases depending on the severity of the incident.

All the Project's workforce shall be notified of the grievance mechanism and how to use/access it upon hiring, as well as during or regarding potential retrenchment processes. This does not override or substitute worker's right to freedom of association, participation in other collective agreements or their right to submit grievances via workers' organizations and unions.

### 6.1.3 THIRD PARTY GRIEVANCE MANAGEMENT

IFC requires that all Project employees have access to an effective grievance mechanism, including third party (any external auditors, or individuals related to the Project) or subcontractor employees. If the hired third party or subcontractor cannot provide a well-functioning and effective grievance mechanism, then such employees will be required to use the Project's workforce grievance mechanism. Otherwise the Client shall provide an alternative grievance mechanism for the subcontractor workforce that adheres to the requirements under the IFC PS.

As subcontractors and their employees are also part of the Project workforce, they shall also be made aware of the grievance mechanism and how to utilize it when they are hired. Such employees can also exercise their rights and submit grievances elsewhere and shall engage in workers' associations as they see fit.

## 6.2 GRIEVANCE MECHANISM PROCESS

Figure 6-1 below provides an overview of the process for filing and addressing issues the grievance mechanism.

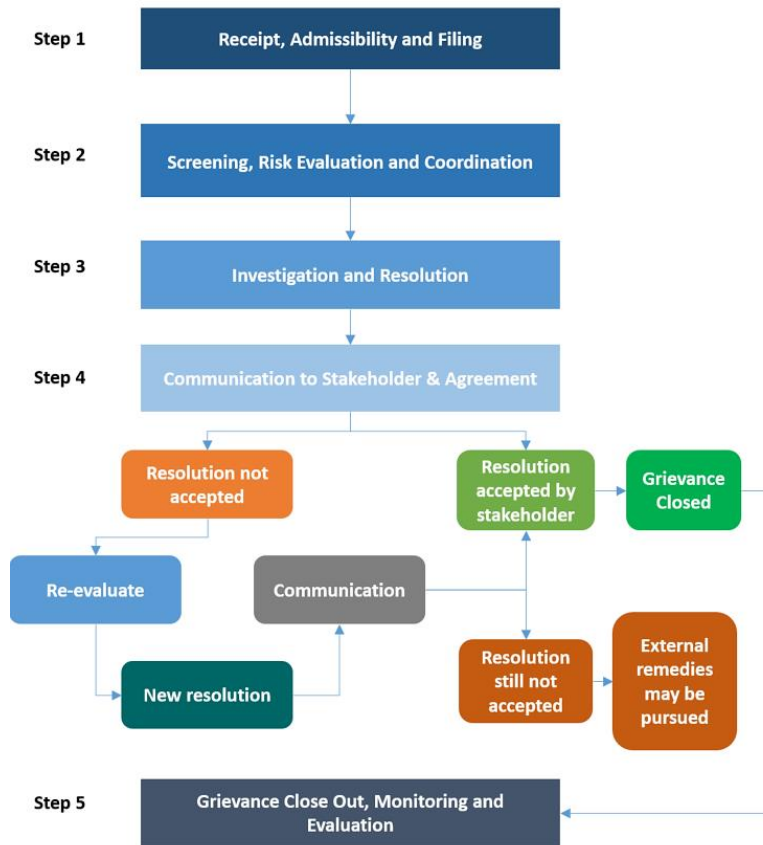


FIGURE 6-1 GRIEVANCE MECHANISM PROCESS

Source: ERM 2022

The protocol for handling Workforce and Community Grievances will generally be the same and is described in the remaining sub-sections of this chapter. A Community Liaison Officer (CLO) will be designated for the Project and will be responsible for the implementation of the entire SEP, including management of the grievance mechanism. The CLO must ensure that the mechanism is well-functioning and effective, and be relatively easy to use so that Project proponents avoid the risk of tiring stakeholders with additional labor or increasing any adverse experiences with the Project.

Once grievances are submitted, they will be filed and documented in the stakeholder register, followed by a risk-screening to evaluate the severity of the issue and urgency in which it must be addressed. The risk screening will determine the approach for investigation and resolution (Step 4), with the end goal of closing out grievances in an appropriate and agreeable manner with stakeholders. The handling of all grievances will be thoroughly documented for reporting to stakeholders and overall monitoring and evaluation of the Project’s risks and impacts to stakeholders and general social/socio-economic environment.

Each step of the process is discussed in greater depth in the following sections. Roles and Responsibilities are described in Section 7.

### 6.2.1 STEP 1: RECEIPT, ADMISSIBILITY, AND FILING

Stakeholders shall be able to submit grievances at various avenues/sources; this ensures that all stakeholders can access the relevant Project GM easily. The Client will assign a Project CLO

who will manage overall stakeholder engagement and the GM. They will be responsible for ensuring that the requirements and protocols laid out in this SEP, other Project management plans, and IFC requirements are abided by when handling grievances and working with the GM.

Stakeholders can submit grievances:

- Verbally or in writing to the Project CLO<sup>4</sup>,
- Verbally or in writing to Project team<sup>5</sup>,
- In person or in writing via regular mail using the attached grievance form included in Appendix C.
- Electronically, by submitting a form on the Project website.
- Contacting the Client's office at: Kısıklı Cd. Sarkuysan Ak İş Mrk. No:4 A Blok K:2 Altunizade – Üsküdar / İstanbul / Türkiye; Telephone: +902165545400; e-mail: fibayenilenebilirenerji@fibaenerji.com

Stakeholders will be informed as to how the GM shall be used and where to access it; they will have access to the most recent SEP, including a GM, at all times. Other supplementary communication materials may be required of the Client, to convey this information. The language shall be clear and concise, and materials will be shared in English and Turkish.

After a grievance is submitted, the CLO will file the complaint in the Grievance Register/Database with relevant details such as date, complainant (if not anonymous), and general type of grievance within 24 hours of submission; anonymous grievances shall have their anonymity protected but will still be logged in the same manner. The following details must be included in the database:

- Date received
- The date received;
- Description of the concern/complaint;
- Risk level and initial categorization (shall be updated/corrected after phase 2 (6.2.2));
- Indication of workforce or community grievance.
- Grievance management process dates;
- Responsibilities;
- Resolution of the complaint; and
- Other additional information.

Community and workforce grievances will be filed in separate databases/registers but grievances will be processed using the same protocols.

After logging the grievance in the register, the CLO must acknowledge the receipt of the grievance in writing and this must be delivered to the complainant.

Once the grievance is initially logged, the eligibility will be determined to. Grievances will only be considered "eligible" for subsequent processing and potential remediation if the claim is related to the Project activities (during any phase). This includes both direct and indirect activities from/by Project proponents and/or the Project's contractors and subcontractors.

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<sup>4, 5</sup> Personal contact details have been removed due to KVKK (Turkish Personal Data Protection Law)

Grievances are **not** admissible and will be considered ineligible if it meets any of the following criteria:

- The complaint is not related to the Project and has no obvious relationship with the activities of the Project in any of its phases, its contractors or subcontractors.
- It is outside the scope of the Project – e.g. the impact was pre-existing or prior to the start of Project activities.
- The nature of the complaint exceeds the scope of the GM or the Project’s area of influence.
- There are other more appropriate mechanisms or formal institutions or community procedures to deal with the problem.
- The complainant is not eligible to submit Project grievances.

If a complaint is not admissible, they must relay that information in writing with a justification as to why it cannot be processed further. If possible, alternative methods or resources shall be provided to the complainant guiding their next steps or next point of contact to resolve their issue elsewhere. In certain circumstances the CLO may also request further information from the complainant to determine admissibility and/or deal with the grievance in the most fitting manner. Request for further information shall take place after determining the eligibility and must also be documented in writing.

### 6.2.2 STEP 2: SCREENING, RISK EVALUATION AND COORDINATION

After a grievance has been deemed admissible a second screening process will take place to categorize types of grievances and their corresponding risk levels. This is a crucial step to determine the most fitting pathway to resolution and determines the timeframe(s) in which the respective grievance must be handled in. It also allows the CLO to gather the proper personnel and resources to resolve the issue; different individuals or departments may need to be contacted depending on the type of issue and its severity.

Step 2 must be conducted within 24 hours of a grievance’s submission. Table 6-1 below provides an indication of the timeframes for addressing grievances with different risk levels. Once the risk level has been ascertained for an issue, these timelines must be communicated in writing to the complainant. Risk levels will be evaluated based on the definitions in Figure 6-2 below.

**TABLE 6-1 TIMEFRAMES FOR GRIEVANCE RISK CATEGORIZATION**

<b>Steps</b>	<b>High Risk (days)</b>	<b>Medium Risk (days)</b>	<b>Low Risk (days)</b>
Step 1	2 days	1-2 days	1 day
Step 2	2 days	2 days	3-5 days
Step 3	2 days	5-8 days	10-15 days
Step 4	2 days	1-3 days	5-10 days
Total (maximum)	8 days	15 days	30 days

If the grievance is complex – for instance a further assessment requiring external parties to become involved – it may suggest a potential need for a delay. If this is the case, then an interim update specifying the reasoning and additional days required must be provided to the

grievance as soon as possible. A buffer of 5, 7, and 10 days shall be allocated to high, medium, and low risk grievances, respectively.

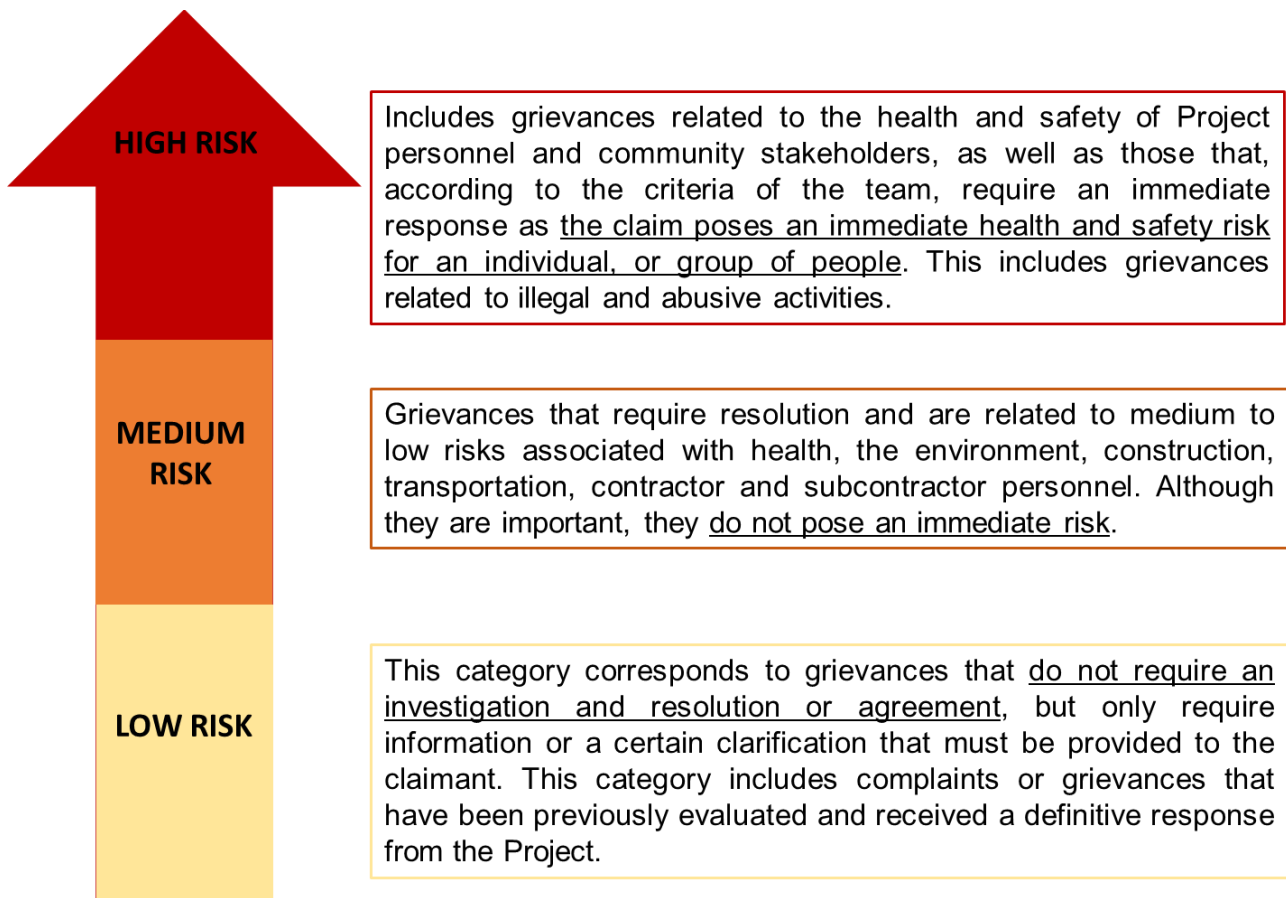


FIGURE 6-2 GRIEVANCE RISK RATINGS

Source: ERM, 2022

Stakeholders and Project proponents (CLO, ESG Manager, Project Managers etc.) shall all be aware of these classifications when the GM is implemented and utilized. This is crucial to ensure that timelines are respected to prevent the grievance from being exacerbated or other similar issues from arising.

### 6.2.3 STEP 3: INVESTIGATION AND RESOLUTION

Determining the risk level helps guide the next steps for investigation (as needed) and resolution. The CLO will then coordinate the needed resources and personnel to understand and respond to the respective issue.

Investigation of grievances entails verifying the scale, nature, and accuracy of the complaint. Further correspondence or an in-person meeting with the grievant may be required at this point, which the CLO may coordinate and should document appropriately. Another measure may be site inspection with relevant personnel, such as the Project team or authorities; this would likely be the case if the complaint is regarding a particular location.

Considerations during investigation may include, but are not limited to:

- Trying to understand/identify the root cause(s) of the problem;

- Trying to identify potential solutions;
- Assessing the cost of the issue vs cost and feasibility of the potential solutions/remediation; and
- Other unexpected or invisible impacts indirectly caused by this issue.

Resolving a grievance may entail corrective measures to compensate for the harm done and/or preventative measures to ensure this issue does not become a pattern, nor is exacerbated.

Potential forms of resolution may include but are not limited to:

- Remuneration (financial or in-kind);
- Improving means of communication between Project stakeholders and with the Project team;
- Implementation of further mitigation measures into Project activities;
- Altering the resources or inputs for a Project activity;
- Adjusting Project timelines;
- Adding further or more specific engagement activities;
- Third party mediation or informal participation;
- bilateral or unilateral redress.
- Providing guidance for further counseling or additional resources;
- And in the worst cases legal proceedings.

All communications, findings, and decisions shall be documented and kept as evidence.

#### 6.2.4 STEP 4: COMMUNICATION TO STAKEHOLDERS

The CLO will then create a formal written response to the grievant summarizing the key findings, outcomes, proposed reconciliatory actions, and resolution. This response must also clearly specify the timelines in which the resolution must be fulfilled by. The grievant shall respond in writing to clarify any outstanding uncertainties and questions, as well as their official agreement or refusal of the proposed commitments. If the aggrieved agrees then the case will be officially closed out, which will be noted in the Grievance Register. Commitments will be logged and tracked in the Project's commitment register, clearly indicating the timelines in which the agreed upon actions must be delivered or met by.

If the aggrieved refuses the proposed solutions and is dissatisfied they can request an appeal and proceed with discussions or negotiations to review the case, if appropriate. If even after an appeal they are still not content they can seek legal redress or other alternative resolution avenue outside of the Project GM. In these situations, the CLO shall put Fiba's legal team in contact with the complainant and try to coordinate any other appropriate resources, if possible. Even if the issue is taken outside of the Project GM, the CLO is responsible for documenting and monitoring the progress of the situation and the ultimate resolution.

If the issue was raised anonymously the proposed action will be posted on the Project website, stakeholder specific forums, Project sites, notice boards and other key locations for stakeholders.

### 6.2.5 STEP 5: GRIEVANCE CLOSE OUT, MONITORING AND EVALUATION

After resolution is formally agreed upon and there are no outstanding protocols the grievance can be closed out. A final agreement must be documented in writing to constitute the closure of a grievance. The status of closure shall be adjusted accordingly in the Grievance Database and all documentation shall be safely kept. The CLO will send a Grievance Closure Letter once it is closed out.

The Commitment Register will be used to monitor and evaluate commitments. If the Client fails to meet the agreed upon requirements/commitments, then the stakeholder can file another grievance or direct the issue to senior management. Feedback from the resolution of grievances shall be documented for monitoring and evaluation purposes. The Project team will also periodically conduct internal reviews and assessments on the efficacy of the SEP and GM and adjust accordingly. Further details on monitoring and evaluation are listed in section 8.

## 6.3 GENDER-BASED VIOLENCE AND HARASSMENT PROVISIONS

The IFC's Good Practice Note on Addressing Gender-Based Violence and Harassment<sup>6</sup> highlights that risks of gender based violence and harassment (GBVH) against members of the local community where a temporary workforce and influx of male workers are required for Project developments. During the construction phase for major infrastructure and renewable projects there is often an influx of temporary and a predominately male workforce who are not already members of the local community into shared community spaces or areas with local community members. A traditionally male working environment, different social norms, power dynamics, new financial power, and separation from communities are among a host of different explanations for why there may be exacerbated harassment, exploitation, abuse towards women; land acquisition during construction also suggests increased GBVH risks. Similarly, nations that have relatively weak rule of law, higher levels of corruption, the risks of GBVH and protection for reconciling such impacts may become exacerbated.<sup>7</sup>

This GM includes additional guidelines to mitigate potential GBVH related incidents and that if such impacts do arise they are handled with care, respect, and sensitivity:

- GM shall be easily accessible and safe to all stakeholders and local communities.
- Stakeholders shall all have the option to submit any grievances confidentially and their anonymity will be preserved and respected.
- The Client will ensure that a specific person (female or other preferred gender) is available for stakeholders to approach directly with sensitive and urgent issues such as GBVH related incidents.
- If GBVH related incidents are identified within Project related activities stakeholders shall be offered referral and support systems, as well as compensation in particular situation; this may take the form of counselling or direction to other informal resources (women's health organizations or additional healthcare services).

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<sup>6</sup> Source: IFC (2020), Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector, International Finance Corporation, <https://www.ifc.org/en/insights-reports/2020/publications-gpn-addressinggbvh>, last retrieved 29 April 2024.

<sup>7</sup> Ibid.



Incidents involving GBVH will be deemed high risk and urgent and have a fast-tracked response approach to ensure that the situation is resolved before further harm can occur. During Project-related

## 6.4 MONITORING AND REPORTING

Grievances and their resolutions will be identified, logged, and tracked in the Project's grievance register; an example is provided in Appendix C. The handling of grievances and affiliated processes shall also be periodically reviewed to ensure compliance with the protocols stipulated in this SEP; this is crucial to maintaining transparency, consistency, and fairness when resolving all stakeholder issues. Moreover, it is crucial that during review there is crucial confirmation that timeframes have been properly respected to ensure that full stakeholder rights are respected and prevent issues from worsening.

Section 8 addresses documentation, monitoring, and reporting requirements in more depth.

## 7. ROLES AND RESPONSIBILITIES

Table 7-1 defines the scope of roles and responsibilities regarding SEP implementation and management of the GM.

**TABLE 7-1 ROLES AND RESPONSIBILITIES FOR SEP MANAGEMENT**

Role	Responsibility
<b>Pazarköy Solar Plant Project Manager</b>	<ul style="list-style-type: none"> <li>Overall accountability for Project implementation including grievance work stream</li> <li>Management of relations with authorities and other key stakeholders</li> <li>Liaison with financiers and shareholders.</li> <li>Responsible for providing the resources necessary for implementing this SEP</li> </ul>
<b>Fiba Yenilenebilir Enerji Holding A.Ş. HSE and Sustainability Director</b>	<ul style="list-style-type: none"> <li>Coordination of local engagement team and other activities involving community relations</li> <li>Ensuring messaging is consistent and clear when engaging stakeholders</li> <li>Communicate the CGM process and obligations to Project personnel, contractors, and others engaged on the Project</li> <li>Regularly review the Grievance Register and ensure it is maintained and up-to-date</li> <li>Notify management of any high priority grievances</li> <li>Prepare reports that summarize stakeholder engagement activities including grievances received and resolution status</li> </ul>
<b>Community Liaison Officers (CLO) also acting as the Grievance Manager and GBVH Coordinator (please note that a female CLO will be employed)</b>	<ul style="list-style-type: none"> <li>Engage regularly with community stakeholders, including local community members, civil society organizations, landholders and land/resource users, households and vulnerable groups, with the aim of building the trust and respect of the community</li> <li>Ensure that affected communities are informed about the Project, its activities and its impacts, ensuring that stakeholders' comments / questions and their concerns are considered and addressed</li> <li>Ensure effective operation of grievance management process including receipt, registration, investigation, resolution and monitoring of grievances</li> <li>Communicate grievance management process to communities and the outcome(s) of the grievance investigation(s)</li> <li>Manage and build the communications team</li> </ul>

	<ul style="list-style-type: none"> <li>• Oversee external and internal communication</li> <li>• Work closely with the Environmental and Social Manager to prepare/validate communication materials aligned with Company standards and ensure messaging, branding, reputation management and, occasionally, government relations</li> <li>• Ensuring messaging is consistent and clear when engaging stakeholders</li> <li>• Communicate the CGM process and obligations to Project personnel, contractors, and others engaged on the Project</li> <li>• Regularly review the Grievance Register and ensure it is maintained and up-to-date</li> <li>• Notify management of any high priority grievances</li> <li>• Prepare reports that summarize stakeholder engagement activities including grievances received and resolution status</li> <li>• Receive GBVH grievances and address them through resolution</li> <li>• Decide which GBVH grievances require investigation and coordinate the investigation</li> <li>• Provide guidance for matters pertaining to livelihood restoration and displacement, compensation for and consultations with PAPs</li> </ul>
<b>Contracts/Procurement Manager</b>	<ul style="list-style-type: none"> <li>• Responsible for engagement with local businesses/suppliers and their concerns/complaints.</li> </ul>

## 8. DOCUMENTATION, MONITORING, AND REPORTING

This section provides further specification on the overall approach and requirements related to documentation, monitoring, and reporting related to the SEP and its engagement activities and grievance management.

### 8.1 DOCUMENTATION TRACKING

All stakeholder engagement activities shall be systematically and comprehensively documented to ensure that actions on behalf of the Project development team are transparent and appropriate. This documentation will be used to track, evaluate and report on the Client's social performance related to the Project and consistently weave in learnings and feedback into Project planning and development.

- The following list includes the minimum of documentation efforts that the Project team will maintain:
- Stakeholder Register: a categorized list of stakeholders, including necessary or appropriate key contact details, will be maintained and adjusted/updated throughout the entire Project life cycle.
- Stakeholder Engagement Log: will be used to document, evaluate, and report on stakeholder engagement activities that have taken place. It shall include the date, location, a brief overview of the key parties that were present during the engagement/activity, what was discussed, and note any other relevant information, outcomes or responses from the meeting/mode of outreach.
- Commitment Register: is crucial for the Project team to track any commitments to or agreements made with stakeholders during consultations or upon/after grievance resolution.

- Meeting minutes (and template): the minutes from all meetings must be recorded and stored, including date and parties present; meetings that require sensitivity, privacy or that must preserve the anonymity of participants will be handled accordingly. A template for meeting minutes will also be created and shared with stakeholders among other materials so that they understand how engagements will be documented and stored.
- Event and meeting evidence: in addition to the meeting minutes, other evidence such as photographs and attendance lists shall also be gathered and kept. Participants shall be made aware of these efforts.
- Grievance Database: the grievance database will include submitted grievances in the grievance register (include internally and externally submitted grievances related to the Project) and how grievances have been addressed.
- Other Media: media monitoring of related press-releases or news stories that are related to or relevant for the Project shall also be gathered and kept; relevant resources shall be shared with the public.

The Project team will keep a specific folder or central location in which all of the SEP related files, documents and materials are kept. The documentation and storage of such materials will align with Turkish data protection laws and requirements.

## 8.2 MONITORING AND EVALUATION

The Client will create a monitoring management plan with clear processes for reviewing documentation and evaluating SEP implementation and engagement efforts. The general protocol will include (but is not limited to):

- Implementing planned SEP activities and specification on the key performance indicators that will be used to measure or evaluate performance and success;
- Monitoring and evaluation of communication and engagement activities (and other related materials such as engagement evidence and meeting minutes) between the Client and Project stakeholders;
- Specification on the measures that will be used to assess media coverage that may be relevant to the Project, the Client and shareholders;
- Periodic evaluation of engagement strategies and engagement actions laid out in this SEP, such as updates to stakeholder mapping and analysis.

The Client shall encourage participatory engagement and feedback from stakeholders as often as possible, as such input can greatly optimize monitoring and evaluation efforts.

Furthermore, the client will also maintain a grievance log to track submissions to the GM. The log must note the issue, involved stakeholder or stakeholder group, classification of risk level, how it was ultimately dealt with, and if the grievance is considered on-going (still being resolved) or closed out. The Client will also consider monitoring:

- If the GM is appropriate and accessible for different stakeholders and how it can be improved;
- The total number of issues raised, and specification on the number of reports from vulnerable groups;
- De facto timeframes in which grievances were closed out, to gain an understanding of average response times and if stipulated timelines are feasible.

Table 8-1 below highlights the key performance indicators (KPIs) that will be used to track and evaluate if objectives have been sufficiently met or where improvement is needed.

**TABLE 8-1 SEP KEY PERFORMANCE INDICATORS**

Review topics	Objective	Indicators
Periodic review of publicly available Project documents such as Project information materials, flyers, the website, media materials and social media communications and other documents and or channels	<ul style="list-style-type: none"> <li>Assess whether publicly available Project documents and online platforms are up-to-date</li> <li>Assess cultural appropriateness of publicly available information</li> <li>Assess communications distribution channels to ensure they are available to communities in the AoI</li> <li>Assess level of engagement with stakeholders through formal and informal means (e.g., meetings with government agencies, public meetings and online engagement)</li> <li>Track issues raised by stakeholders</li> <li>Confirm the company is responding to issues in a timely manner</li> <li>Verify consultation activities include awareness raising about the GM</li> </ul>	<ul style="list-style-type: none"> <li>Date of publicly available Project information; frequency of distribution</li> <li>Level of understanding of information by stakeholders</li> <li>Number and types of comments/feedback received by stakeholders</li> <li>Number and timing of responses to comments received</li> <li>Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process</li> </ul>
Monthly review of community grievances	<ul style="list-style-type: none"> <li>Assess whether grievances are correctly classified</li> <li>Identify trends in grievances</li> <li>Confirm that grievances are being adequately addressed</li> </ul>	<ul style="list-style-type: none"> <li>Number of grievances by risk type</li> <li>Number and percentage (%) of grievances closed according to risk type and number of close out forms signed by the complainants</li> <li>Timeframes for resolution (and closure) by grievance type</li> <li>Number of repeated grievance from the same stakeholder</li> <li>Trends in numbers of complaints</li> <li>Topics of complaints</li> </ul>
Quarterly review of GM	<ul style="list-style-type: none"> <li>Assess compliance with the grievance management process</li> <li>Evaluate progress in achieving GM objectives</li> <li>Identify improvements and update GM</li> </ul>	<ul style="list-style-type: none"> <li>Level of compliance with the process</li> <li>Completeness of grievance register</li> <li>Number of grievances by level and type</li> <li>Timeframes for resolution (and closure) by grievance type</li> <li>Number and % of grievances closed according to type</li> <li>Number of satisfied responses from complainants by grievance type</li> <li>Number of repeat of a grievance from the same community stakeholder</li> </ul>

- Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process
- Qualitative assessment of trust in grievance management process through stakeholder engagement.

### 8.2.1 EVALUATION

The objectives specified in this SEP will guide evaluations of efficacy. Other evaluation methods will include but not be limited to:

- Gathering information from locals (e.g. perception and/or satisfaction surveys);
- Additional interviews or feedback sessions with stakeholders;
- Third party or external evaluations.

As the Project develops corrective actions will be carried out to improve performance and address any stakeholder engagement related matter that has not been successful. The SEP will be reviewed and updated at least quarterly to prevent deviations from the plan and address inefficiencies as early as possible.

### 8.2.2 REPORTING TO STAKEHOLDERS

The following two sub-sections specify how internal and external reporting to stakeholders shall proceed.

#### 8.2.2.1 INTERNAL REPORTING

Internal reporting documents will include, but may not be limited to:

- **Monthly reports:** will provide an overview of the engagement activities that have been carried out in that respective month. It will indicate the number of grievances submitted, addressed, and closed out. The individual responsible for the Project's SEP implementation will be responsible for creating and delivering the monthly reports to concerned parties, namely the Project team and company's E&S Management team(s).
- **Quarterly progress reports:** will be prepared for the Company's senior management teams to communicate progress and findings on the Project's social performance, including stakeholder engagement efforts and success.
- **Grievance Mechanism reporting:** will include an overview of main grievances reported (any identifiable patterns), summary of progress and efficacy of grievance mechanism approach and protocols, and participation.
- Progress on the set objectives for stakeholder engagement throughout reporting activities and their implementation:
  - Engagement activities carried out to date, which will indicate the stakeholders who were engaged, key topics addressed, expectations and concerns, etc.;
  - Project risks;
  - Any limitations, such as resourcing or organizational capacity, internal alignment etc.;
  - Priorities for next quarter;
  - Corrective actions undertaken or to be expected.

These reports will be circulated internally to the Project team, respective company management and relevant stakeholders, as required. Reporting and information circulation will respect all relevant data and privacy protection laws and requirements, especially regarding information and reporting pertaining to the grievance mechanism.

#### 8.2.2.2 EXTERNAL REPORTING

After consultation with stakeholders the Project team shall communicate what feedback/to what extent inputs have been integrated into Project activities and protocols; stakeholders will also seek clarification on specific mitigatory efforts will be implemented to mitigate potentially adverse impacts or how Project impacts will or are being monitored.

The Client shall keep a commitment register to track and verify that agreed upon measures are respected and upheld in the agreed upon timeframes. This Commitment Tracker shall be reviewed and re-distributed to Lenders (if requested), namely summarizing how grievances have been closed out (i.e. measures for resolution).



APPENDIX A      STAKEHOLDER REGISTER –  
ENGAGEMENT LOG

Project Name: Pazarkoy Solar Plant
Version Number: 1
Year: 2024

STAKEHOLDER ENGAGEMENT ACTIVITIES								
Overview								
Stakeholders	Engagement method (bilateral consultation, townhall, social media post etc.)	Date	Responsible Person/Facilitator	Meeting Summary (incl. Stakeholder attendees)	Minutes documented and stored in Project folder? (Y/N)	Key outcomes and actions	Project materials shared? (Y/N)	Additional Notes





## APPENDIX B      GRIEVANCE REGISTER



Initiator				Person to address/respond			Issue							
Settlement/ Area	Problem Type	Name	Date	Contact Details	Name	Contact Details	Other notes	Description of Issue	Department Responsible	Responsible Person	Actions	Deadline	Intervention Outcome(s)	Closing Date





## APPENDIX C      GRIEVANCE FORM



## GRIEVANCE FORM

Name and Surname: *(no need to fill if you prefer not to disclose your identity.)*

Date: \_\_\_/\_\_\_/\_\_\_

Phone:

E-mail:

Signature:

Grievance/Request:

*Please provide as much detail as possible so that we can understand your grievance/request. If your grievance/request refers to a specific incident/event, please explain **when**, **where** and **how** the incident happened and **who** was involved.*

Has the issue occurred multiple times?

- Yes (.....times)
- No

---

**Person Responsible for Record Keeping:**

## RECORD AND RESPOND *(Only for internal usage)*

Required action:

---

Status of compliant: *(Only for internal usage)*

---

Closing evidence/explanation:

---



# ERM

Grievance is closed by:

Date:

Signature:



ERM HAS OVER 160 OFFICES ACROSS THE FOLLOWING  
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	The Netherlands
Australia	New Zealand
Belgium	Peru
Brazil	Poland
Canada	Portugal
China	Puerto Rico
Colombia	Romania
France	Senegal
Germany	Singapore
Ghana	South Africa
Guyana	South Korea
Hong Kong	Spain
India	Switzerland
Indonesia	Taiwan
Ireland	Tanzania
Italy	Thailand
Japan	UAE
Kazakhstan	UK
Kenya	US
Malaysia	Vietnam
Mexico	
Mozambique	

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