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Kavram Enerji Yatırım Üretim ve
Ticaret A.Ş.

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Stakeholder Engagement Plan

Uluborlu Solar Power Plant Project



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Uluborlu Solar Power Plant Project

0710724

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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
EBRD	European Bank for Reconstruction and Development
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
ILO	International Labor Organization
KPI	Key Performance Indicator
LRP	Livelihood Restoration Plan
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 Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. ("Kavram" or "the Client") a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş. ("Fiba") for the Uluborlu Solar Power Plant ("the Project") that is planned to be built in the Isparta Province 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 Project Affected People (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 client is looking for a Project financing structure in which involves the European Bank for Reconstruction and Development (EBRD). For projects financed by the EBRD, compliance with the EBRD Environmental and Social Policy 2019 and the EBRD Performance Requirements (PRs) is mandatory.

To be in line with the EBRD PRs, the Client has engaged Environmental Resources Management (ERM) to conduct an Environmental and Social Due Diligence (ESDD), including a Stakeholder Engagement Plan for the Project.

During ERM's ESDD key E&S findings and gaps were identified, leading to the preparation of the Project Environmental and Social Action Plan (ESAP). The ESAP defines additional actions to be undertaken by responsible parties, involving timelines and indicators of completion.

1.1 SEP PRINCIPLES AND OBJECTIVES

This SEP has been established around the key principles of stakeholder engagement as defined by the European Bank for Reconstruction and Development (EBRD) Performance Requirements (PRs) namely Performance Requirement 10. 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 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 a 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 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 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 perspectives and information.
- Establish provisions for stakeholder feedback integration into Project development as much as possible.

The Grievance Mechanism in Section 5.5 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:

- Annex A: Stakeholder Register Template
- Annex B: Stakeholder Engagement Log
- Annex C: Sample Grievance Register
- Annex D: Grievance Form

2. PROJECT OVERVIEW

2.1 BRIEF PROJECT DESCRIPTION

Uluborlu Solar Power Plant Project (hereafter "the Project") has a total installed capacity of 54.9 MWm / 54.9 MWe and is located in Isparta Province, Uluborlu District, İleydağı and Güneykent Villages. The Project will act as an auxiliary source of the existing 61.2 MWm / 60.00 MWe Uluborlu Wind Power Plant Project. In total, the capacity will be 116.19 MWm / 54.9 MWe.

The Project consists of 3 different polygons which are shown in Figure 2-1 below. In the figure, the blue lines represent the license area, T1-T36 represents the existing wind turbines and GES1-GES3 represents the planned solar power plant areas.

The general layout and main access to the Project area is shown in Figure 2-1. 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.

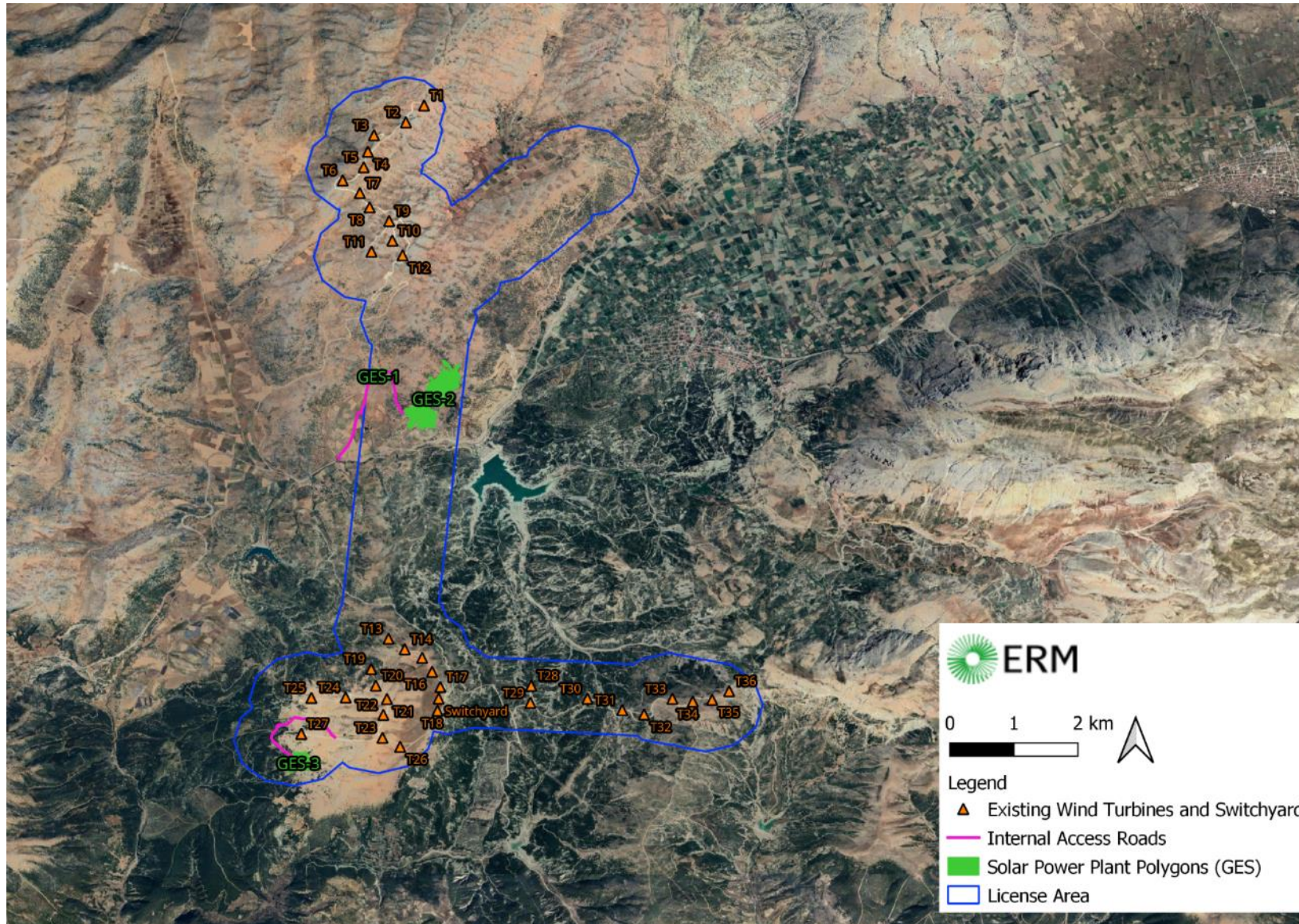


FIGURE 2-1 PROJECT LAYOUT

2.2 PROJECT PARTIES

The parties involved in the Project are listed in Table 2-1 below.

TABLE 2-1 PROJECT PARTIES

Role	Entity
Project Owner	Fiba Yenilenebilir Enerji Holding A.Ş.
Special Purpose Vehicle (SPV)	Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
Engineering, Procurement, and Construction (EPC Contractor)	Tegnatia Enerji Üretim San. ve Tic. A.Ş.
Primary Panel Supplier	Alfa Solar Enerji ve Sanayi Ticaret A.Ş.
ERM GmbH	Independent international E&S consulting firm hired by Kavram
EBRD	Financial Lender

2.3 LOCATION AND LAND REQUIREMENTS

Figure 2-2 below provides an overview of the Project location. The Solar Power Plant areas are expected to be 61.29 hectares in total. The Project is located in the İleydağı and Güneykent Villages, of the district of Uluborlu and Gönen in the Isparta Province. It is approximately 30 km away from Isparta city center. The closest settlement to the Project area is a building belonging to İleydağı Village which is 120 m and 370 m from Access Road 3 and 2 respectively as well as 478 m from the GES-1. The closest building from GES-3 is located 2,625 m away and 2,249 m from Access Road 1.

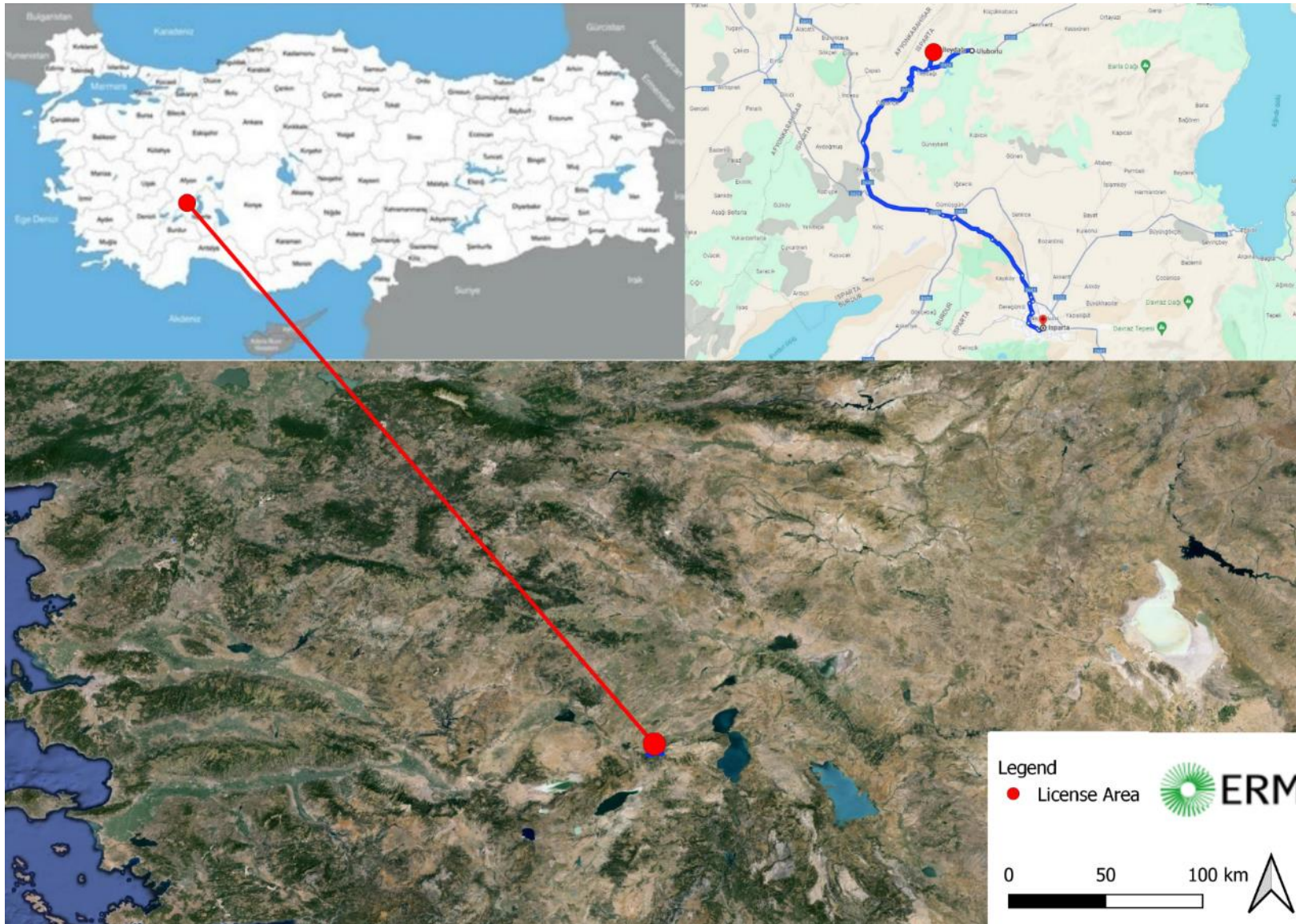


FIGURE 2-2 PROJECT LOCATION MAP

As shown in Figure 2-1, the land areas for the proposed Project are fragmented and independent from each. The Project area spans over forest, grazing and agricultural areas.

According to the Client livestock will still be able to pass between Project areas and access privately held pastures, and forest clearings around the İleydağı and Güneykent Villages. Other open and uncultivated areas suitable for livestock grazing are available around the Project area close to İleydağı and Güneykent Village.

The majority (34 out of 38 parcels) of land required for the construction of this Project is privately owned. The Project plans to purchase the privately owned parcels through willing-buyer and willing-seller negotiations.

Landowners/users will be kept informed of the developments of the Project and will have access to a grievance mechanism 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).

3.1.1.5 ARTICLE 74 RIGHT OF PETITION

Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

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 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 assets¹ 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.

¹ State appropriation of movable assets is addressed in the scope of other Turkish laws.

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.

3.2 INTERNATIONAL STANDARDS AND GUIDELINES

3.2.1 EBRD PERFORMANCE REQUIREMENTS AND EP4

The primary international standards that underpin this SEP are the EBRD Performance Requirements. 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.

More specifically, it is imperative that the Client engage with communities and stakeholders as early 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.

EBRD PR10 refers to *Information Disclosure and Stakeholder Engagement* and the key requirements stipulated by this PR 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 Relevant Project 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.
- **Meaningful 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:** Informed consultation 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 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.

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); and
- Any international treaties and conventions relating to the environment and social performance that the host country has ratified or is part of.

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"> • Ministry of Energy and Natural Resources • Ministry of Agriculture and Forestry • General Directorate of Nature Conservation and National Parks • General Directorate of Forestry • General directorate of State Hydraulic works (DSI) • Ministry of Culture and tourism • Antalya Cultural Heritage Preservation Regional Board Directorate • Ministry of Environment, Urbanization and Climate Change • Ministry of Health
Local Government	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. The local Government needs to be engaged to maintain a direct line of communication, identify important	<ul style="list-style-type: none"> • Isparta Governorship • Isparta Municipal Government • Provincial Directorate of Environment, Urbanization and Climate Change • Provincial Disaster and Emergency Directorate • Provincial Directorate of Forestry and Agriculture

	issues which may impact the Project, and ensure social support.	
Local Institution/Public Service Providers	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	<ul style="list-style-type: none"> • Emergency response (firefighters, paramedics, police departments etc.) • Local enterprises (hospitality, construction, energy/heating companies and distributors etc.) • Environmental Institutions (Natural Life Protection Association; Environment Foundation of Türkiye; Human Rights Association (IHD); Türkiye Environmental Protection and Greening Agency (TÜRÇEK)
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"> • Local community(s) • Mukhtars (village leaders) • Land owners and users • Residents of Uluborlu District • Residents of İleydağı Village • Residents of Gönen District • Residents of Güneykent Village • Opinion leaders (i.e. prominent individuals from the region such as celebrities)
Vulnerable Groups	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 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.	<ul style="list-style-type: none"> • Women • Children • Elderly/retired persons • Illiterate persons • Mentally or physically disabled or chronically ill-persons • Asylum seekers • Migrant workers • Low-income households
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.</p> <p>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"> • Environmental and Human Rights Organizations

Academic Institutions	Educational institutions and individuals with direct interest in the Project, and its social and environmental aspects and that can 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.	<ul style="list-style-type: none"> • Staff and students at Isparta University • Other schools within the AoI
Media	Local, regional and national level media may influence local stakeholders' perceptions of the Project.	<ul style="list-style-type: none"> • Local radio stations • News stations/channels • Local TV networks • Newspapers and magazines • Local websites
Internal Stakeholders	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.	<ul style="list-style-type: none"> • Shareholders • Employees at Fiba Renewables • Contractors/subcontractors • Potential lenders • Supply chain workers

As the Project develops the Client will updates the stakeholder identification exercise and stakeholder Register relative to any Project changes. A sample Stakeholder Database/Register can be seen in Appendix A 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 specific information on the stakeholders is obtained.

4.2.1 APPROACH AND PURPOSE OF MAPPING

After stakeholders are identified they will be mapped according to their influence and importance as shown in Figure 4-1. Influence on, interest in, and impact on the Project are all ranked from low-high.

Influence	H	Involve	Collaborate	Collaborate
	M	Involve	Involve	Collaborate
	L	Inform	Consult	Consult
	L	M	H	
	Interest			

FIGURE 4-1 STAKEHOLDER PRIORITY MATRIX

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 impacts 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.

PRELIMINARY HIGH-LEVEL MAPPING

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

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

FIGURE 4-2 PRELIMINARY STAKEHOLDER MAPPING

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 Social Impact Assessment (SIA).

4.3 CONSIDERATIONS FOR VULNERABLE GROUPS

EBRD PR 10 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, 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 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 25.01.2022 and in a national newspaper on 25.01.2022 as pictured in Figure 5-1 and Figure 5-2 below.

HABER **SPARTA** **POSTASI** 25 OCAK 2022 SALI **3**

DAVRAZ TURİZM MERKEZİ'NDE KIŞ ŞENLİKLERİ DÜZENLENDİ
Akdeniz'in en iyi, Türkiye'nin gözde turizm merkezlerinden Davraz Kayak Merkezi "2022 Kış Şenlikleri" ne ev sahipliği yaptı. Yoğun kar yağışı altında yapılan şenliklerde etkinlik müdür sorumluları tarafından düzenlenen şenliklere hayranlar davet edildi. Şenliklere İsparta'daki üniversitelerdeki öğrencilerin yanı sıra ilköğrencilerin de katılımıyla Davraz Kayak Merkezi'nde düzenlenen şenlikler, öğrencilerin katılımıyla gerçekleştirildi. Öğrenciler merakla beklenen yarışmaları kazandı. Yarışmaları kazanan öğrenciler, öğretmenleri tarafından ödüllendirildi.

Yardımların Melekleri Kongresini yaptı Alev Sevük ve ekibi güven tazeledi
Türkiye Yardım Severleri Derneği İsparta Şubesi'nin 36. Olağan Genel Toplantısında mevcut başkan Alev Sevük ve ekibi yeniden başkanlığa seçildi. 2021 yılında 37 üniversite öğrencisine 250 TL, 44 yardıma muhtaç ailelere maddi ve kasım ayında 100'er TL yardım yapıldı. Alev Sevük Başkanlığındaki Türkiye Yardım Severleri Derneğinde Yönetim Kurulu üyeleri yer aldı. Feriit Sağlamer, Emel İyemir, Şule Okur, Özlem Okur, Nilüfer Aytaç, Gül Şahin, Erhan Aytepe, Büyükoğlu, Günyaz Akay, Deryem Kuru, Adile İpek, Hatice Beyhan, Yüksek Kırkıl, Haber Merkezi.

KOMBİ DOLANDIRICILARI YAKALANDI
İsparta Zafer Mahallesi'nde kamet eden M.K. kombinin arızalanması sebebiyle internet ortamından kombi bakımı ve tamiri ile ilgili arayışta bulunan arama motorunda ilk çıkan internet sitesinde görüldü ve dolandırıcılar tarafından kullanılan telefon numaraları arandı. Görüşülen telefon görüşmesinde, şüpheli S.Z. mağdur M.K. nin adresini alarak ve uygun bir fiyatla arızaları telefon görüşmesi sonlandırdı. 19.01.2022 günü şüpheli S.Z. nin yönlendirildiği şüpheli E.G. ve B.Y. mağdur şahıs Zafer Mahallesi'nde yakalandı. Komünite tamiri ediyor ve arızayı gideriyor gibi para talep çıkararak şüpheli, belli bir süre sonra kombinin bakımını tamamlandığını söyleyip mağdurları öneki pazarın tamir kat kat fazla para istiyor ve parayı alarak ikametden uzaklaşıyor.

Otogarda Uyuşturucu Operasyonu: 1 kişi tutuklandı
İsparta Emniyet Müdürlüğü Nisantola Sırtları Mücadele Şube Müdürlüğü görevlerinde, İsparta otogarında yapılan operasyonda yollu otobüsünde yolcu olarak bulunan A.B. isimli şahıs yakalandı. Otobüsün arızalanması nedeniyle Konya'ya gitmek isteyen şahıs, "Yakalanan şahıs hakkında "Uyuşturucu veya Uyuştürücü Madde Ticareti Yapma veya Sağlama", "Kullanmak İçin Uyuşturucu veya Uyuştürücü Madde Satın Almak, Kabul Etmek, Bulundurmak ve Kullanmak" suçlarından işlem yapılmış ve şüpheli çıkarıldığı adli mercilere tutuklanarak cezaevine teslim edilmiştir. İsparta 1. Emniyet Müdürlüğü görevleri olarak uyuşturucu veya uyuştürücü maddenin kullanılması ve ticaretinin gerçekleştirilmesi yönünde operasyonlarımız kapsamında başarılı sonuçlandırdık" denildi. Haber Merkezi

"Yeşil Kampüs ve SDÜ'nün Değişen Çehresi" Webinarı Gerçekleştirildi
Süleyman Demirel Üniversitesi'ne düzenlenen "Yeşil Yaşanabilir ve Sürdürülebilir Yeşilçilik Modelinin Geliştirilmesi Projesi" kapsamında "Yeşil Kampüs ve SDÜ'nün Değişen Çehresi" konulu bir webinar düzenlendi. Su Emniyeti Müdürü Doç. Dr. Şehnaz Şahin moderatörlüğünde Zoom uygulaması ve Bilim TV YouTube Kanalından gerçekleştirilen toplantı, Üniversitemiz Tıp Fakültesi Temel Tıp Bilimleri Bölümü, Dr. Öğretim Üyesi Adnan Karabrahimoğlu konurmuş olarak katıldı. Daha yaşanabilir, temiz çevrenin her geçen gün daha da önem kazandığını belirten Karabrahimoğlu, çevrenin genel anlamıyla yaşadığımız ortam, çevre ile ekolojik yaşam ortamını anlattığını söyledi. Ekolojik kavramın çevre kavramı ile ilgili olduğunu dile getiren Karabrahimoğlu, "Ekolojik insan da dahil olmak üzere tüm canlıların yaşadığı ortam ve bitkilerin ile ilgili kavramları bilmemiz gerekir. Eko, kelime kökeni itibarıyla çevre, sırf anlamına gelmez. Çevrenin ekolojik olarak incelenmesi bizi yakından ilgilendiriyor. İsparta olarak çevremizle ilgili oldukça fazla görülebiliyoruz. Bu anlamda şanslıyız" dedi. Dinlediği yayınları kütüphane olarak kullanabileceğini belirten Doç. Dr. Şahin, "Yeşil, temiz" gibi kavramların korunması ve sürdürülebilir olması gerektiğini belirtti. Karabrahimoğlu, ayrıca konuşmasında Üniversitemizde yeşil kampüs çalışmalarından ve SDÜ'nün doğal alanlarından bahsetti. (HABER MERKEZİ)

DUYURU
ÇED Sürecine Halkın Katılımı Toplantısı
Kavram Enerji Yatırımı'nın ve Tic. A.Ş. tarafından, İsparta'da, Uluborlu ve Gönen ilçeleri, Beydağ ve Güneykent Mevkilerinde 61,2 MVA'lık MVA Uluborlu Rüzgar Enerji Santreline Yatırım Kaynak Güçü Enerji Santrali (Yardımcı Kaynak GES) Kapasitesi: 54.9927MVA/54.9927 MVA, Toplam Tesis Kapasitesi: 116.1927 MVA/116,1927 MVA" projelerinin yapılması planlanmaktadır. İhtiyaçlarınızı için Çevre ve Ekoloji Değerlendirmesi (ÇED) Yönetmeliğinin 3. Maddesi gereğince aşağıda belirtilen tarih ve saatte aşağıdaki şekilde bilgilendirilmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" yapılacaktır.
Halkımıza saygılı ve duyurulur.
Toplantı Yeri: Beydağ Köyü Kahvehanesi
Toplantı Yerinin Adresi: Beydağ Köyü Aluborlu/İSPARTA
Toplantı Tarihi: 15.02.2022
Toplantı Saati: 14:00
Proje Sahibi: Kavram Enerji Yatırımı'nın ve Tic. A.Ş.
Tel: (0218) 554 54 00
Faks: (0218) 474 52 62
ÇED Raporunu Hazırlayan Kuruluş: SELİN İNŞAAT TURİZM MÜŞAVİRLİK SAN. VE TİC. LTD. ŞTİ.
Tel: (0312) 481 33 73
Faks: (0312) 481 45 85
Resmî İnternet: www.kan.gaz.türkiye BASIN: 1540743

FIGURE 5-1 PROJECT ADVERTISEMENT IN NATIONAL NEWSPAPER

Source: Local EIA, 2022

18 / 25 Ocak 2022 / 5411 DÜNYA

Yorumlar

Para politikası
GÜRAL ERDOĞAN
degiyor.com/yazarlar

Hes ve Ötesi (2)
YAVUZ ERDOĞAN
degiyor.com/yazarlar

Japonya esirliği
EREN PAZARCI
degiyor.com/yazarlar

Son 10 yılda Türk toplumu ve ekonomisi nasıl değişti?
DR. BURCU AYER ÖZDOĞRU
degiyor.com/yazarlar



Hızlı büyüme şirketler dünyasına ne kadar yansıdı?

KEMAL AKI
İsmet Özkul
ismetokul.com.tr

Türkiye'nin en hızlı büyüyen şirketleri arasında yer alan ve küresel şirketler dünyasına ne kadar yansıdığı soruluyor. 2021 yılında 300 milyar dolarlık satışları olan Türkiye'nin en hızlı büyüyen şirketleri arasında yer alan ve küresel şirketler dünyasına ne kadar yansıdığı soruluyor. 2021 yılında 300 milyar dolarlık satışları olan Türkiye'nin en hızlı büyüyen şirketleri arasında yer alan ve küresel şirketler dünyasına ne kadar yansıdığı soruluyor.

2021 yılın beklenen yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır?

2021 yılının beklenen yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır? 2021 yılının beklenen yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır?

TÜRKİYE VE DÜNYA GİRİŞİMİ

2021 yılının beklenen yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır? 2021 yılının beklenen yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır?

Yeni para politikası çerçevesi

EKONOMİDE UFUK TURU
Fatih Özatay

MİT'in yeni para politikası çerçevesinde Türkiye ekonomisinde önemli gelişmeler yaşanıyor. Yeni para politikası çerçevesinde Türkiye ekonomisinde önemli gelişmeler yaşanıyor.

Bir ülkenin riskinin yüksek düzeylerde seyrettiği bir ortamda yerli paranın değerinin belirlenmesi için uluslararası risk ölçütleri kullanılması gerekiyor.

Uluslararası risk ölçütleri kullanılması gerekiyor. Uluslararası risk ölçütleri kullanılması gerekiyor.

Dış piyasalardan kaynak bulmak zorlaşıyor

EKONOMİNİN HALKALI
Servet Yıldırım

Ekonominin halkalı servet yıldırım. Ekonominin halkalı servet yıldırım. Ekonominin halkalı servet yıldırım.

Uluslararası yatırımcıların gelişmekte olan ülkelere yönelik risk algılarının zayıfladığı dönemlerde bile "güçlü büyüyen" şirketlerin dışarıdan her yerden borçlanabilme imkanları devam ediyor ve edecektir.

Uluslararası yatırımcıların gelişmekte olan ülkelere yönelik risk algılarının zayıfladığı dönemlerde bile "güçlü büyüyen" şirketlerin dışarıdan her yerden borçlanabilme imkanları devam ediyor ve edecektir.

Yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır?

Yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır? Yüksek büyüme hızına, şirketler dâhil olmak üzere tüm sektörler ne kadar hazır?

“Depoları kentsel dönüşüm doldurdu”

Depoları kentsel dönüşüm doldurdu. Depoları kentsel dönüşüm doldurdu. Depoları kentsel dönüşüm doldurdu.

DUYURU
Hatkin Katılımı Toplantısı

Kavram Enerji Yatırım Üretim ve Tic. A.Ş. tarafından hazırlanan Hatkin Katılımı Toplantısı. Kavram Enerji Yatırım Üretim ve Tic. A.Ş. tarafından hazırlanan Hatkin Katılımı Toplantısı.

FIGURE 5-2 PROJECT ADVERTISEMENT IN NATIONAL NEWSPAPER
Source: Local EIA, 2022

Moreover, the EIA states that there was a public Participation Meeting on 15.02.2022 at 14:00 in the İleydağı Village Coffee House in Uluborlu of the Isparta Province. This is pictured in Figure 5-3 below.





FIGURE 5-3 PUBLIC PARTICIPATION MEETING

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. Neighborhood residents, headmen and officials from relevant public institutions attended the meeting, and the Client stated that the meeting minutes, participant lists and meeting minutes were documented electronically. Brochures (Figure 5-4) were provided in the meeting to introduce the Project to attendees. The official Project owners and the company supporting the EIA answered stakeholder concerns such as those pertaining to potential impacts to agricultural land, employment opportunities etc.

PROJE KAPSAMINDA DEĞERLENDİRİLMİŞ YAPILACAK BAZI KANUN VE YÖNETMELİKLER

- 2872 Sayılı Çevre Kanunu
- 4342 sayılı Mara Kanunu
- 5403 sayılı Toprak Koruma ve Arazi Kullanımı Kanunu ve Uygulama Yönetmeliği
- 8831 sayılı Orman Kanunu
- 2318 sayılı Karayolları Trafik Kanunu ve bu kanuna bağlı Yönetmelik
- 4827 sayılı İş Kanunu ve bu kanuna bağlı Yönetmelik ve Tüzükler
- Hafriyat Topağı, İnşaat ve Yıkıntı Atıklarının Kontrolü Yönetmeliği
- Sarıyık Kaynaklı Hava Kirliliğinin Kontrolü Yönetmeliği
- Hava Kalitesi Değerlendirme ve Yönetimi Yönetmeliği
- Atık Yönetimi Yönetmeliği
- Su Kirliliği Kontrolü Yönetmeliği
- Çevresel Görünümün Değerlendirilmesi ve Yönetimi Yönetmeliği
- Çevresel Etki Değerlendirmesi Yönetmeliği
- Çevre Denetimi Yönetmeliği
- Ambalaj Atıklarının Kontrolü Yönetmeliği
- Önemli Taramalıya Lastiklerin Kontrolü Yönetmeliği
- Atık Pii ve Akümüleörlerin Kontrolü Yönetmeliği
- Atık Yağların Yönetimi Yönetmeliği
- Biyosel Atık Yağların Kontrolü Yönetmeliği
- Tıbbi Atıkların Kontrolü Yönetmeliği
- Yeraltı Sulanının Kirlenmeye ve Bozulmaya Karşı Korunması Hakkında Yönetmelik
- Akılın Düzeltici Depolanmasına Dair Yönetmelik
- Toprak Kirliliğinin Kontrolü ve Moktasal Kaynaklı Kirlenmiş Sulanına Dair Yönetmelik
- Çevre İzin ve Lisans Yönetmeliği
- Ses Düzeyi Emisyonunun Takibi Hakkında Yönetmelik
- Egzoz Gazı Emisyonu Kontrolü Yönetmeliği
- Adet Bölgelerinde Yapılacak Yapılar Hakkında Yönetmelik

PROJE ALANI
İSPARTA İLİ, ULUBORLU VE GÖNEN İLÇELERİ SINIRLARI İÇERİSİNDE

PROJE İLE İLGİLİ İRTİBAT BİLGİLERİ

Kavram Enerji Yatırım Üretim ve Tic. A.Ş.
Telefon : (0218) 554 54 00

Selin İnşaat Tur. Müş. San. ve Tic. Ltd. Şti.
İrtibat Kişisi : Sevinç ÖZKİHAN
Telefon : (0312) 481 33 73

KAVRAM ENERJİ YATIRIM ÜRETİM VE TİC. A.Ş.

61,2 MWm/80 MWe ULUBORLU RÜZGAR ENERJİ SANTRALİNE YARDIMCI KAYNAK GÜNEŞ ENERJİ SANTRALİ

(Yardımcı Kaynak GES Kapasitesi: 54,9927 MWm/54,9927 MWe, Toplam Tesis Kapasitesi: 116,1927 MWm/80 MWe)

TANITIM BROŞÜRÜ

CFD Sürecine Halkın Katılımı Toplantısı :

Tarih : 15.02.2022
Saat : 14:00
Yer : İlye'deği Köy Kahvehanesi
Adres : İlye'deği Köyü
Uluborlu/İSPARTA

Toplantıya Gerekleştirecek Firma

Selin İnşaat Tur. Müş. San. ve Tic. Ltd. Şti.
Kahri Caddesi 1335. Sokak No: 20/10
Aşağıöveciler / ANKARA
Tel: 0312 481 33 73 [Pbx] Faks: 0312 481 45 85
selin@selinib.com.tr

PROJENİN TANIMI VE AMACI

Kavram Enerji Yatırım Üretim ve Tic. A.Ş. tarafından Isparta İli, Uluborlu ve Gonen İlçeleri sınırları içerisinde, İlye'deği ve Günyaykiri mevkiilerinde Uluborlu Bölgesik Yenilenebilir Enerji Üretim Tesisi olarak kapasitesinde 61,2 MWm/80 MWe kapasiteli Uluborlu Rüzgar Enerji Santraline Yardımcı Kaynak Güneş Enerji Santrali kurulması ve işletilmesi planlanmaktadır.

Yardımcı kaynak GES kapasitesi 54,9927 MWm/54,9927 MWe olup, toplam tesis kapasitesi 116,1927 MWm/80 MWe olacaktır.

Proje kapsamında her biri 545 W güce sahip 100.504 adet panel kullanılması öngörülmektedir.

Toplam 73,89 hektar alanda planlanan güneş enerji santrali 3 adet üniteden oluşacak ve RES sahaları içerisinde 3 alanda konulanacaktır.

Yardımcı kaynak güneş enerji santralinin üretileceği yıllık azami üretim miktarı 108.000.000,00 kWh/yıl'dır.

Hibrit enerji sisteminin, sistem verimliliğini arttırmak için ve aynı zamanda enerji arz dengesi sağlamak için konvansiyonel sistemlerin yenilenebilir enerji üretim sistemleri ile entegrasyon çalışmasıdır. Hibrit sistemde bir enerji kaynağının (örneğin güneş) diğer kaynağın (örneğin hidroelektrik) ile birleştirilmesiyle, her iki kaynağın da sistemde kullanılması mümkündür.

Hibrit santral ile, RES yatırımındaki tesis kapasitesinin verimli kullanılması sağlanacaktır.

Ayrıca rüzgar enerji santralinde bir arada veya bakım durumunda üretim yoksa veya üretim çok düşük ise güneş paneli ile üretilen enerjiye geçmeden devam etmesi sağlanacaktır.

Uluborlu GES projesinin Isparta yaklaşıp 8 ay sürmektedir.

İnşaat aşamasında 1 adet geçici partiye kurulacak olup, çalışmalar günlük ihtiyaçları karşılayan kantinlerden karşılanacaktır.

PROJE ÖZELLİKLERİ

Ana Kaynağa Dayalı Ünite Bilgileri	
Kaynak Türü	Rüzgar
Ünite Sayısı	36 adet
Ünite kurulu gücü	36 x (1,7 MWm/1.067 MWe)
Toplam kurulu güç	61,2 MWm/80 MWe
Yardımcı Kaynağa Dayalı Ünite Bilgileri	
Kaynak Türü	Güneş
Ünite Sayısı	3 adet
Ünite kurulu gücü	1x11.990 MWm/11.990 MWe + 1x35.001 MWm/35.001 MWe + 1x8.002 MWm/8.002 MWe
Toplam kurulu güç	54,9927 MWm/54,9927 MWe
Bilanço: netimle ilgili detaylı Soruların İçin "Yenilenebilir Enerji Üretim Tesisi" olacaktır.	
Kavram Enerji Yatırım Üretim ve Tic. A.Ş.	
Kaynak Türü	Rüzgar/Güneş
Ünite Sayısı	39 adet
Ünite kurulu gücü	(36 x (1,7 MWm/1.067 MWe) + (1x11.990 MWm/11.990 MWe) + (1x35.001 MWm/35.001 MWe) + (1x8.002 MWm/8.002 MWe))
Toplam kurulu güç	116,1927 MWm/80 MWe

ÇEVRESEL ETKİLER VE ALINACAK ÖNLEMLER

Aktörler: Proje inşaat ve işletme aşamalarında oluşabilecek muhtemel etkilerin mevcut kapasitesinde yapılacak birleştirilerek, yapılacak ve beklenecek etkiler (evsel etkiler) kat-suyu etkiler, ambalaj atıklar vb.) özellikle doğaya bırakılmayacak olup, geri dönüşümü mümkün olanlar ile değerlendirilecektir.

Proje uygulanmasında atık malzemelerin geri kazanılması ve yeniden kullanılması için çalışmaları ara indirecek ve verimli olarak teknik olarak uygulanabilir yöntemler, insan sağlığı ve çevre için güvenli bir şekilde olacaktır.

Panel kurulum çalışmaları sırasında ortaya çıkabilecek bazı fiziksel etkiler, arazi düzenleme ve eğimden dolayı oluşacak ve yükleniciler tarafından önlemler alınarak giderilecektir. Arazi yapısına göre oluşturulan tabii toprak işleme ve peyzaj düzenleme çalışmaları ile etkiler azaltılacaktır.

Hava Kirliliği: İnşaat çalışmaları sırasında oluşabilecek tozlu emisyonlar için, "Sarıyık Kaynaklı Hava Kirliliğinin Kontrolü Yönetmeliği"ne göre önlemler alınacaktır. Bu kapsamda;

- Sarıyık yapmadan yüklenicilerle çalışılacaktır.
- Çalışma alanı toz ve kuru havalandırma sistemleri olacaktır.
- Ayrıca depolanmış malzemenin tozlanması engellenmek için yığınlar kaplanması veya nemlendirilmesi sağlanacaktır.

Gürültü Kirliliği: Çevresel Gürültünün Değerlendirilmesi ve Yönetimi Yönetmeliği hükümlerine uyulacaktır.

İş Sağlığı ve Güvenliği: İş kazalarının önlenmesi için çalışma alanlarına uygun levhalar konulacak ve çalışanlara işyeri koruyucu ekipmanlar verilecektir.

FIGURE 5-4 PROJECT INTRODUCTORY BROCHURE

Source: Fiba Renewables, 2022

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 0);

- 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 EBRD PR10.

5.2.1 ENGAGEMENT AS IT PERTAINS TO PR5

Due to the Project's large land requirements and gaps between Turkish and EBRD 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 EBRD PR5. While the social baseline and SIA are currently being prepared, the local resettlement expert is developing a Livelihood Restoration Plan (LRP) as per the requirements of PR5; 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 LRP.

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 LRP and RAP;
- And Consultations on issues pertaining to grievances related to EBRD PR5.

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 are in good faith and their engagement is meaningful. The engagement also needs to take 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.²

² Source: EBRD (2019), Environmental and Social Policy, PR 10: Information Disclosure and Stakeholder Engagement https://www.ebrd.com/downloads/about/sustainability/ESP_PR10_Eng.pdf, last retrieved 21 May 2024.

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 an 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.

TABLE 5-1 STAKEHOLDER ENGAGEMENT ACTION PLAN

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
SIA Disclosure					
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)	Kavram
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 Use stakeholder and local input to	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 through posts in the Mukhtar office.	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)	Kavram

	ensure that identified social impacts are properly evaluated and assessed.	Timing for these events will be specifically defined 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)	Kavram
Post-SIA/SIA Disclosure					
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.	Kavram
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.	Kavram
Regular meetings with workers	Check in regarding grievances and grievance mechanism Implement mitigation measures with relevance to	Targeted meetings, focus groups	Workers (internal stakeholders)	Monthly during the construction and annual during the operation.	Kavram

	worker health and safety and labor and working conditions				
Implementation of the LRP and on-going engagement with stakeholders on matters related to EBRD PR5	<p>Implement the LRP as per document and EBRD PR 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	Kavram
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	Kavram

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.

This Grievance Mechanism has been developed around the principles and guidelines stipulated in EBRD 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 feedback is 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; and
- 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 adhere to 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 PR 1, but also helps manage the social risks and impacts related to: community health, safety, and security (PR 4); land use, land acquisition and resettlement or displacement (PR 5); and cultural heritage assets (PR 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 (EBRD PR 2 and PR 4). 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, EBRD PR2 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 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

EBRD 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 EBRD PRs.

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.

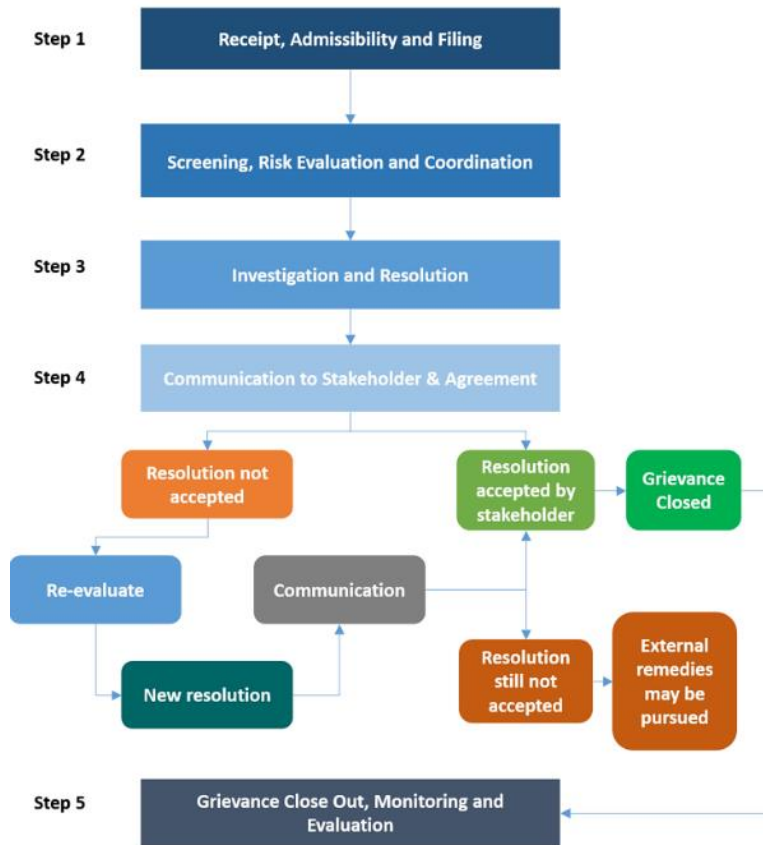


FIGURE 6-1 GRIEVANCE MECHANISM PROCESS

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 EBRD requirements are abided by when handling grievances and working with the GM.

Stakeholders can submit grievances:

- Verbally or in writing to the Project CLO³,
- Verbally or in writing to Project team⁴,
- In person or in writing via regular mail using the attached grievance form included in [Appendix D](#).
- 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;
- 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. Grievances are **not** admissible and will be considered ineligible if it meets any of the following criteria:

^{3, 4} Personal contact details have been removed due to KVKK (Turkish Personal Data Protection Law)

- 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

Steps	High Risk (days)	Medium Risk (days)	Low Risk (days)
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.

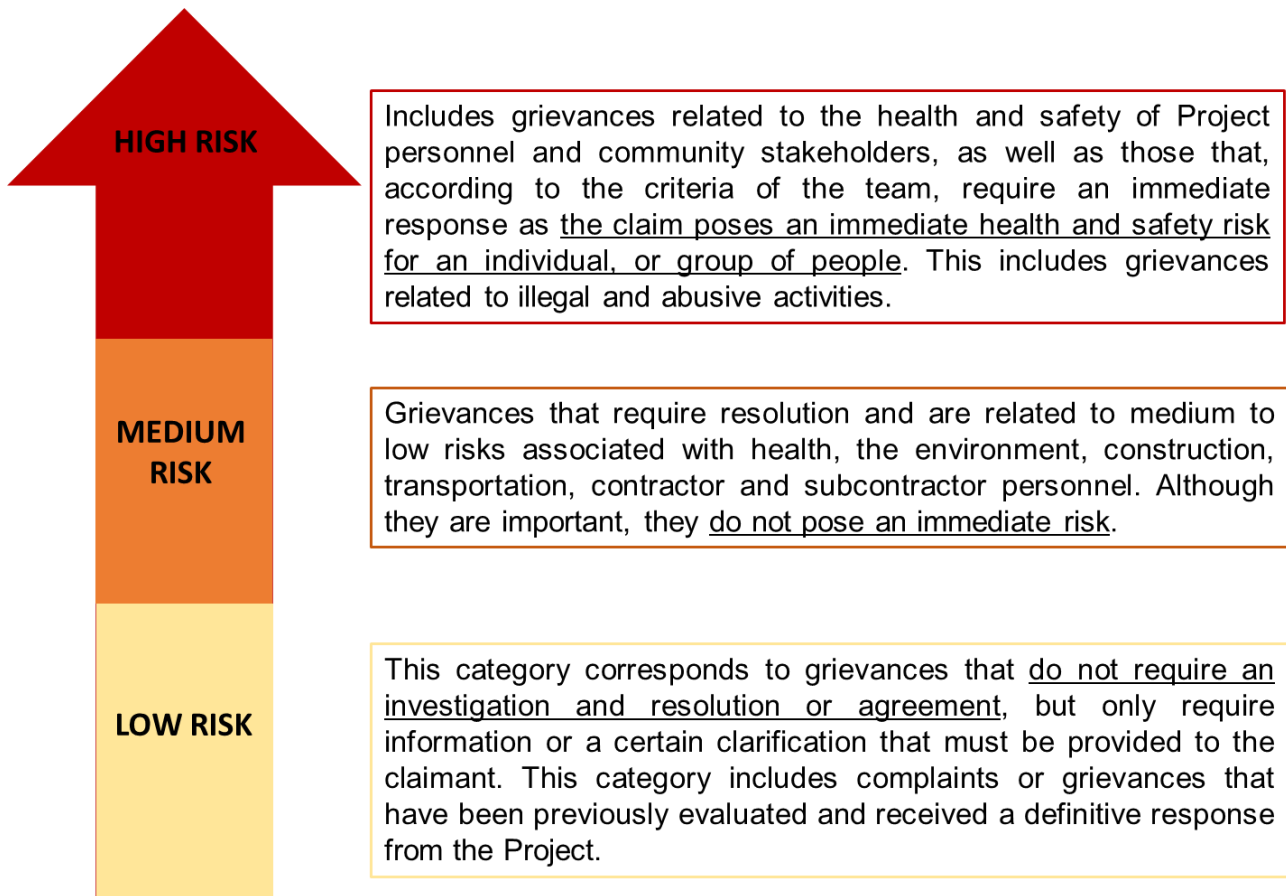


FIGURE 6-2 GRIEVANCE RISK RATINGS

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;
- Assing 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
- 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 EBRD's Guidance Note on Gender-Based Violence and Harassment (GBVH) notes that the presence of a temporary workforce (construction workforce) during Project development increases the risks of GBVH towards local stakeholders (community members, service users, other employees etc.). 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.

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).

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 Annex 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
Uluborlu Solar Plant Project Manager	<ul style="list-style-type: none"> • Overall accountability for Project implementation including grievance work stream • Management of relations with authorities and other key stakeholders • Liaison with financiers and shareholders. • Responsible for providing the resources necessary for implementing this SEP
Fiba Yenilenebilir Enerji Holding A.Ş. HSE and Sustainability Director	<ul style="list-style-type: none"> • Coordination of local engagement team and other activities involving community relations • Ensuring messaging is consistent and clear when engaging stakeholders • Communicate the CGM process and obligations to Project personnel, contractors, and others engaged on the Project • Regularly review the Grievance Register and ensure it is maintained and up to date • Notify management of any high priority grievances • Prepare reports that summarize stakeholder engagement activities including grievances received and resolution status
Community Liaison Officers (CLO) also acting as the Grievance Manager and GBVH Coordinator (please note that a female CLO will be employed)	<ul style="list-style-type: none"> • 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 • 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 • Ensure effective operation of grievance management process including receipt, registration, investigation, resolution and monitoring of grievances • Communicate grievance management process to communities and the outcome(s) of the grievance investigation(s) • Manage and build the communications team • Oversee external and internal communication • 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 • Ensuring messaging is consistent and clear when engaging stakeholders • Communicate the CGM process and obligations to Project personnel, contractors, and others engaged on the Project • Regularly review the Grievance Register and ensure it is maintained and up to date • Notify management of any high priority grievances • Prepare reports that summarize stakeholder engagement activities including grievances received and resolution status • Receive GBVH grievances and address them through resolution • Decide which GBVH grievances require investigation and coordinate the investigation

	<ul style="list-style-type: none"> • Provide guidance for matters pertaining to livelihood restoration and displacement, compensation for and consultations with PAPs
Contracts/Procurement Manager	<ul style="list-style-type: none"> • Responsible for engagement with local businesses/suppliers and their concerns/complaints.

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 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"> • Assess whether publicly available Project documents and online platforms are up to date • Assess cultural appropriateness of publicly available information • Assess communications distribution channels to ensure they are available to communities in the AoI 	<ul style="list-style-type: none"> • Date of publicly available Project information; frequency of distribution • Level of understanding of information by stakeholders • Number and types of comments/feedback received by stakeholders • Number and timing of responses to comments received • Qualitative assessment of awareness of community stakeholders of GM through stakeholder engagement process

	<ul style="list-style-type: none"> Assess level of engagement with stakeholders through formal and informal means (e.g., meetings with government agencies, public meetings and online engagement) Track issues raised by stakeholders Confirm the company is responding to issues in a timely manner Verify consultation activities include awareness raising about the GM 	
Monthly review of community grievances	<ul style="list-style-type: none"> Assess whether grievances are correctly classified Identify trends in grievances Confirm that grievances are being adequately addressed 	<ul style="list-style-type: none"> Number of grievances by risk type Number and percentage (%) of grievances closed according to risk type and number of close out forms signed by the complainants Timeframes for resolution (and closure) by grievance type Number of repeated grievances from the same stakeholder Trends in numbers of complaints Topics of complaints
Quarterly review of GM	<ul style="list-style-type: none"> Assess compliance with the grievance management process Evaluate progress in achieving GM objectives Identify improvements and update GM 	<ul style="list-style-type: none"> Level of compliance with the process Completeness of grievance register Number of grievances by level and type Timeframes for resolution (and closure) by grievance type Number and % of grievances closed according to type Number of satisfied responses from complainants by grievance type Number of repeats of a grievance from the same community stakeholder 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; and
- 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: Uluborlu 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

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	