



## BAŞARAN CARPET TEXTILE TRADE AND INDUSTRY LTD. CO.

**OPERATION CAPITAL INVESTMENT PROJECT** 

# Stakeholder Engagement Plan (SEP)

(Plan No: BSRN-SOC-PLN-SEP-001)

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## **List of Abbreviations**

ΑοΙ	Area of Influence			
AIIB	Asian Infrastructure Investment Bank			
BCF	Bulk Continuous Filament			
DCC	Document Control Center or System			
EIA	Environmental Impact Assessment			
EHS	Environmental Health and Safety			
ERP	Emergency Response Plan			
ESMS	Environmental and Social Management System			
ESS	Environmental and Social Standard			
GAOSB	Gaziantep Organized Industrial Zone			
GMP	Grievance Mechanism Procedure			
HR	Human Resources			
HS	Health and Safety			
HSE	Health, Safety, and Environmental			
ICP	Informed Consultation and Participation			
IFC	International Finance Corporation			
KPI	Key Performance Indicator			
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.			
NGO	Non-Governmental Organization			
OHS	Occupational Health and Safety			
OHSMP	Occupational Health and Safety Management Plan			
OIZ	Organized Industrial Zone			
PAP	Project Affected People			
PP	Polypropylene			
PS	Performance Standard			
R&D	Research and Development			
SEP	Stakeholder Engagement Plan			
SRS	Social Responsibility Staff			
The Project	BAŞARAN CARPET Operation Capital Investment Project			
ТКҮВ	Development and Investment Bank of Turkey			
I				



## 1 INTRODUCTION

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

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

#### 1.1 Background

BAŞARAN CARPET was established in 1985 when the weaving sector was passing from oldschool culture to mass production understanding. Until the mid-90s, BAŞARAN CARPET was serving only in the domestic market, in the following years it turned to the foreign market and its share in the market has been growing day by day.

The company, which exports to more than 50 countries, carries out its activities in the  $4^{th}$  Organized Industrial Zone (GAOSB) in Gaziantep Province, Şehitkamil District, in its facility established on a 52,751 m<sup>2</sup> area.

In the facility, the production and sale activities of carpets woven with different materials and patterns according to customer requests on 16 weaving looms in total, as well as BCF (Bulk Continuous Filament) yarn production using Polypropylene (PP) and various other materials are carried out.

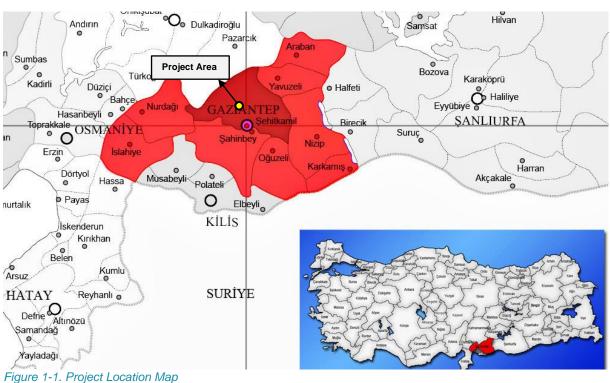
#### 1.1.1 **Project Location and Area of Influence**

The Project area is located in the 4<sup>th</sup> Organized Industrial Zone in Gaziantep Province, Şehitkamil District, and the Project location is given in Figure 1-1.



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The populations, closest distances to the Project area and the directions are given in the following table, and the Area of Influence (AoI) of the Project are given in the Figure 1-2. Since the Project area is located within the OIZ and the natural gas consumption process causes air pollutant emissions from the stacks in the facility, the AoI is determined as a circle with a radius of 2.5 km.

#### Table 1-1. Information on Closest Settlements within the Aol

Settlement	Distance to the	Direction	Population			
Settlement	Project Area (m)	Direction	Total	Female	Male	
Dülük Neighborhood	~1200	Southwest	2767	1334	1433	
Karahüyük Neighborhood	~1800	Northeast	1434	725	709	



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Figure 1-2. Area of Influence

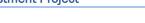
#### 1.2 Purpose

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

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

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

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant





parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

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

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

#### 1.3 Scope

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

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

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

- Grievance Mechanism Procedure (Internal and External) (BSRN-SOC-PRC-GMP-001),
- Occupational Health and Safety Management Plan (BSRN-HSE-PLN-OHSMP-001),
- Emergency Response Action Plan (BSRN-HSE-PLN-ERP-001).

#### 1.4 Definitions

• • • • • • •	All employees and stakeholders can raise a comment or submit a grievance
Accessibility	easily.
	A notification provided by a community member, group or institution to the
Compliant	Project that they have suffered some form of offense, detriment, impairment or
	loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will
Connuentiality	not require personal information or physical presence.
Culturally	A complaint or an issue raised by local communities are considered in the
Appropriate	manner of regional concerns and convenient resolution process will be taken.



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External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Vulnerable People	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## 2 KEY ROLES AND RESPONSIBILITIES

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

Table 2-1. Rey Roles and Responsibilities					
Roles	Responsibilities				
Top Management	<ul> <li>Approves of this Plan and resources required for implementation,</li> <li>Determines the policies and targets regarding the social communication and stakeholder engagement,</li> <li>Ensures this plan is implemented during the lifetime of the Project,</li> <li>Provides necessary resources for proper implementation of this SEP and GMP,</li> <li>Makes the final decision concerning internal and external grievances (if needed) in the light of the assessments of the Social Responsibility Staff (SRS) and HSE Manager,</li> </ul>				

Table 2-1. Key Roles and Responsibilities

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Roles	Responsibilities
	Determines of the social budget of the Project.
	• Having overall responsibility for the implementation of this SEP by fulfilling project requirements,
Management Systems Representative	<ul> <li>Makes periodic inspections of the performance of contractors of its operations during the lifetime of the Project,</li> </ul>
	• Determines necessary resources for the proper implementation of this SEP and reports them to the Top Management.
	<ul> <li>Implements SEP and GMP,</li> <li>Ensures the facility's compliance with the Project Standards, and other requirements set out in this Plan,</li> <li>Coordinates the relevant parties for proper implementation of this Plan,</li> <li>Reports to the Management System Representative about the system</li> </ul>
	<ul> <li>Ensures national and international legislations/guidelines which are applicable to the Project activities are identified and tracked,</li> </ul>
	• Records all formal and informal engagement activities with local communities in DCC,
	• Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports,
	<ul> <li>Monitors and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement quarterly reports,</li> </ul>
	<ul> <li>Forms relationships with the Project stakeholders,</li> <li>Organizes stakeholder meetings to collect the responses to grievances actively as required,</li> </ul>
Social Responsibility Staff (SRS)	• Provides regular reporting back to the community on the management related to community grievances,
	<ul> <li>Determines and providing the necessary training materials for employees,</li> <li>Keeps the records of the complaints and/or suggestions in the</li> </ul>
	<ul> <li>Receips the records of the companies and/or suggestions in the Grievance Database with details (by whom, date, status, etc.),</li> <li>Searches the causes of the grievance and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities,</li> </ul>
	• Monitors all complaints and ensuring that all complaints are resolved and closed properly and in a timely manner,
	• Follows the results of complaint and reporting on a weekly, monthly, and annual basis,
	Records and reporting general and local employment rates and complaints, which are received or observed verbally,     Fills out the "Crigorance Register Form & Consultation Form" (acc
	<ul> <li>Fills out the "Grievance Register Form &amp; Consultation Form" (see Appendices A and B),</li> <li>Gives the feedback to the stakeholders about the results of their</li> </ul>
	<ul> <li>Gives the feedback to the stakeholders about the results of their grievances through Grievance Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 days that the grievance solution process has started and after the grievance closed).</li> </ul>

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Roles	Responsibilities			
	<ul> <li>Works in cooperation with other departments in order to determine targets for Environmental, Social, HS and resource efficiency,</li> <li>Determines of the national and international legislations that are applicable to the Project activities and informing the Management Systems Representative,</li> </ul>			
Health, Safety and Environment (HSE) Manager	<ul> <li>Determines of the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances,</li> <li>Ensures that all provisions in the Contractor engagements regarding</li> </ul>			
	<ul> <li>environmental, social and HS requirements as per the Project Standards during operation phase and auditing the performance of the Contractors on those requirements,</li> <li>Support SRS to find the solutions to the answers of social grievances raised by employees, the local community and local institutions.</li> </ul>			
Document Control Center (DCC) Staff	<ul> <li>Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date,</li> <li>Records and keeping up to date all permits and/or the results of measurements taken within the scope of the Project,</li> <li>Makes documents accessible to all Project employees (including</li> </ul>			
Contractors / Subcontractors & Employees	<ul> <li>Contractors / Subcontractors' employees).</li> <li>Contractors / Subcontractors are responsible not to make any commitment in their interactions with the stakeholders beyond their competence,</li> <li>Follows the rules listed in this SEP and other relevant Management System documentation of the Project,</li> <li>Complies with the requirements and standards of the SEP.</li> </ul>			

## **3 NATIONAL AND INTERNATIONAL STANDARDS**

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

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

#### 3.1 Applicable National Standards

#### The Constitution of The Republic of Turkey

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



#### <u>I. Legal Egalitarianism</u>

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

#### II. Prohibition of Forced Labor

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

#### III. Freedom of Thought and Opinion

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

#### IV. Freedom of Expression and Dissemination of Thought

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

#### V. Right of Petition

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

#### Law on The Right to Information

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

#### Law on The Use of Right to Petition

**ARTICLE 3**. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves

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or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

#### Labour Law

#### The Principle of Equal Treatment

**ARTICLE 5.** Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

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

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

#### Overtime Work

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

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

#### Working Age and Prohibition of Child Employment

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

#### Unions and Collective Agreements Law

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



#### Environmental Law

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

#### 3.2 Applicable International Standards, Legislations and Guidelines

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

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



#### 3.2.1 IFC Performance Standards

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

- An Environmental and Social Management System ("ESMS") should be prepared and implemented, and the element of stakeholder engagement should be included,
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature, and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation (ICP) is to be conducted.

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

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

#### 3.2.2 AllB Requirements

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

"The Bank believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients to achieve this objective.



Meaningful consultation is a process that begins early and is ongoing throughout the Project. It is **inclusive, accessible, timely and undertaken in an open manner**. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders' views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the Project."

#### 3.3 Project Standards

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

## 4 STAKEHOLDER ENGAGEMENT ACTIVITIES

#### 4.1 Early Engagement

Within the scope of engagement activities, any official consultation meeting has not been conducted up to date. However, in the scope of the Environmental and Social studies performed by MGS, interviews and/or face-to-face meetings have been performed with mukhtars and representative of Gaziantep Organized Industrial Zone (GAOSB) in Şehitkamil District on 1<sup>st</sup> of February 2022. The aim of those meetings was to obtain information on the socio-economic structure of the region through specifically prepared surveys.

A summary of previous engagement activities for the Project is provided in the Table 4-1, and the consultation photos are presented in Annex F of this document.

#### Stakeholder Engagement Plan



Table 4-1. Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local	Mukhtar of Dülük	01.02.2022	<ul> <li>The total population is about 4000, and the number of houses is around 800.</li> <li>In the last 5 years, the number of the population in the neighborhood has increased by approximately 20%. The reason for this increase is the job opportunities in the OIZ and the proximity of the neighborhood to the OIZ.</li> <li>It is a settlement with a history of 600,000 years. There are many registered historical and archaeological assets within the borders of the neighborhood.</li> <li>There is 1 primary school and 1 secondary school within the boundaries of the neighborhood. For high school education, students in the neighborhood go to schools in Beykent (8 km) or Çarşı (12 km).</li> <li>The average household income is the minimum wage.</li> <li>The total land area of the neighborhood is approximately 2000 decares.</li> <li>Peanut is the agricultural product grown in the neighborhood.</li> <li>There are approximately 2000 cattle in the neighborhood.</li> <li>There are approximately 2000 cattle in the neighborhood.</li> <li>There are a official health center in the neighborhood, but there are no regular health personnel.</li> <li>There are 2 coffee shops in the neighborhood.</li> <li>The nearest Gendarmerie/Police station is in Beykent, 8 km away.</li> <li>The neighborhood has infrastructure services such as electricity, natural gas, water, sewerage and asphalt.</li> <li>There is an environmental pollution (noise and air pollution) caused by the neighborhood being close to the OIZ. However, the noise and air pollution in question does not originate from the facility within the boundaries of the neighborhood and there is no public bus. There is a transportation problem.</li> <li>There are about 20 very poor households in the neighborhood where the head of household is a child.</li> <li>There are 6-7 mentally handicapped and 3 physically disabled people in the neighborhood.</li> <li>There are a households where the head of the household is female and 3 people over 70 years of age living alone.</li> </ul>
Community	Neighborhood	Mukhtar's house	



Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul> <li>There are employees from the neighborhood at the facility that is the subject of the project.</li> <li>In general, there is a serious traffic problem arising from OIZ.</li> <li>No social assistance was provided to the neighborhood within the scope of the Project. Food aid was given only in Ramadan.</li> <li>No positive or negative impacts are expected from the facility activities.</li> <li>Suggestions were made about making a sacrificial slaughtering area in the neighborhood and activating the health center.</li> </ul>
Local Community	Mukhtar of Karahüyük Neighborhood	01.02.2022 Mukhtar's house	<ul> <li>The population of the neighborhood is about 2000 people and the number of households is about 400.</li> <li>It has increased in the last 5 years. Due to the proximity of the neighborhood to the city center, the neighborhood receives immigration.</li> <li>There is 1 primary school and 1 secondary school in the neighborhood. Students go to Gaziantep for high school education.</li> <li>The average household income is the minimum wage.</li> <li>Livelihoods in the neighborhood are construction machinery, agriculture and animal husbandry.</li> <li>The total land area of the neighborhood are wheat, barley, peanuts and olives.</li> <li>There are approximately 200 cattle and 200 sheep and goats in the neighborhood.</li> <li>There are 1 health center, 3 shops and 1 coffee house in the neighborhood.</li> <li>Since the neighborhood is close to industry, there is noise and environmental pollution (smell from oil and plastic factories).</li> <li>When long and large vehicles such as trucks come to the industrial zone (facilities close to the neighborhood, in the neighborhood, there is a traffic problem.</li> <li>There are about 3-5 households in the neighborhood where the head of household is a child but they are supported by their relatives.</li> <li>There are 5 households where the head of the household is female and 6 people over 70 years of age living alone.</li> <li>Information about the project through face-to-face interviews is preferred.</li> <li>In general, there is a serious traffic problem arising from OIZ.</li> <li>Food aid was provided in general. However, it is not known whether the food aid was provided by the OIZ or the Project.</li> </ul>



Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul> <li>There are employees from the neighborhood at the facility that is the subject of the project.</li> <li>There are positive impacts of the Project in terms of economy and employment opportunities.</li> <li>No negative impacts are expected from the Project activities.</li> <li>It was suggested that a roof canbe built in the place where the cemeteries are located.</li> </ul>
Local Institution	General Directorate of Gaziantep Organized Industrial Zone (GAOSB), Documentation and Archiving Chief	01.02.2022 Private Office	<ul> <li>It was stated that information about the Project and the company (BAŞARAN CARPET) was available beforehand</li> <li>Creating an export share and providing employment opportunities are the expected positive impacts of the Project in economic terms.</li> <li>No adverse impacts are expected as the Project carries out its R&amp;D studies efficiently. It has been stated that there will be no adverse effects when the transport and disposal of wastes are carried out properly.</li> <li>It has been suggested to increase communication in terms of social media, to increase fairbased promotions and to introduce production areas.</li> <li>It has been suggested to include universities, governorship, municipality and AFAD as Project stakeholders.</li> </ul>

#### 4.2 Stakeholder Identification

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

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

Stakeholder Groups	Stakeholder Type		
Stakeholder Groups	Affected	Interested	
External Stakeholders			
Local Communities (Settlements in the Aol)			
Mukhtars and residents of the following neighborhoods			
Dülük Neighborhood	$\checkmark$		
Karahüyük Neighborhood			
Government			
Gaziantep Provincial Directorate of Environment,			
Urbanization and Climate Change			
Gaziantep Provincial Directorate of Agriculture and			
Forestry			
<ul> <li>Gaziantep Provincial Directorate of Culture and</li> </ul>			
Tourism			
Gaziantep Provincial Directorate of Health		$\checkmark$	
<ul> <li>Gaziantep Provincial Directorate of Family, Labor and Social Services</li> </ul>			
Governorship of Gaziantep			
<ul> <li>Sub-Governorship of Şehitkamil District</li> </ul>			
<ul> <li>General Directorate of Gaziantep Organized Industrial Zone (GAOSB)</li> </ul>			
Municipality		1	
Gaziantep Metropolitan Municipality			
Şehitkamil Municipality	$\checkmark$	✓	
NGOs			
Gaziantep Chamber of Industry		✓	
Gaziantep Chamber of Commerce		, , , , , , , , , , , , , , , , , , ,	
Internal Stakeholders			
BAŞARAN CARPET Employees			
Contractors/Subcontractors/Suppliers	$\checkmark$	$\checkmark$	

Table 4-2. Stakeholder Groups

#### 4.3 Stakeholder Engagement Program

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

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

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

The following summarizes the stakeholder engagement program in terms of:

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

#### Stakeholder Engagement Plan

#### Tab

able 4-3.	Stakeholder	Engagement Program	

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<ol> <li>Information Disclosure</li> <li>Purpose, start date, duration, and nature of installation and operations activities,</li> <li>Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts,</li> <li>Closure options and impacts on local communities,</li> <li>Grievance mechanism disclosure,</li> <li>Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results,</li> <li>Continue disclosing information via the Project company website.</li> </ol>	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<ul> <li>External Grievance Mechanism</li> <li>1. Disclosure of grievance mechanism to communities,</li> <li>2. Disclosure of grievances received and resolved to communities.</li> </ul>	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	SRS
Local business and industries All affected settlements and mukhtars Project Workers	Employment and Procurement Strategies         1. Recruitment of employees,         2. Training of staff,         3. Procurement of supplies and services.	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<ul> <li><u>Use of Emergency Response and Preparedness</u></li> <li>1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders,</li> <li>2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders.</li> </ul>	Drills Workshops Community meetings	Annual drills or as required	Management Systems Representative HSE Manager SRS



#### Stakeholder Engagement Plan



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#### Method of Responsible **Target Group** Purpose of Engagement and Engagement Topics Frequency Engagement Social progress, economic and social development, and environmental Focus group As required / As SRS protection meetings requested Provision of information on: GAOSB Workshops 1. Mitigation measures against potential environmental and social risks, NGOs 2. Sustainability criteria, 3. Social responsibility projects, implementation principles. Company website Road Transportation and Traffic Safety Face to face At least annually SRS meetings face to face Road safety awareness, including on safe crossing of the bypass and 1. meetings access roads. 2. Types, number, and frequency of vehicles that can be anticipated through Local industries Dependent on different phases of the Project. stakeholder As requested, / as All affected settlements needed for others 3. Collaboration with local communities and responsible authorities to improve classification and mukhtars signage, visibility, and overall safety of roads, particularly along stretches GAOSB located near schools or other locations where children are present. 4. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), 5. Communication of traffic measures and Projectroad usage with mukhtars and other industries. Meetings with As required / As SRS Management of environmental and social risks of the Project All affected settlements Mukhtars requested Provision of information on: and mukhtars 1. Environmental monitoring program HSE Manager GAOSB 2. Environmental monitoring results Brochures Overall information about progress of the Project 3. Workshops

#### Stakeholder Engagement Plan



Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Vulnerable Groups	<ul> <li>Employment and any other interest of vulnerable groups</li> <li>Provision of information on: <ol> <li>Recruitment of employees,</li> <li>Training of staff,</li> <li>Use of roads, water, and other infrastructure, increase in traffic density,</li> <li>Local employment,</li> <li>Important commercial opportunities,</li> <li>Environmental impacts.</li> </ol> </li> </ul>	Meetings targeting any identified vulnerable groups Women meetings and focus group discussions	Meetings during the operation As requested / as required for other meetings	SRS
Workforce All affected settlements and mukhtars Local industries GAOSB Local government	<ol> <li><u>Community Health</u></li> <li>Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities,</li> <li>As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases.</li> </ol>	Face to face meetings Dependent on stakeholder classification	At least annually face to face meetings As requested / as needed for others	SRS
Employees of the Project Project Contactor employees	Employee welfare         Provision of information on:         1. Employee Grievance Mechanism,         2. Labor rights,         3. OHS procedures,         4. Contractor management.	Face to face interview OHS Committee Labor audits	Monthly or when required due to the results of grievance mechanism	SRS

#### 4.4 Tools & Methods for Information Disclosure

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

#### 4.4.1 Internal / Website

Project specific web site (<u>www.basaranhali.com.tr</u>) will keep information on the operations updated on an assigned website in both Turkish and English. Project facility's physical address, telephone numbers and maps are given in the Project Website Contact Page (Figure 4-1). Moreover, informative brochures, Grievance Mechanism Procedure and Stakeholder Engagement Plan will be disclosed on this assigned website for the Project.

	HOME CORPORAT	E	COLLECTIONS CONTACT	
<b>F</b>	e A Organize Sanayi Bölgesi J. Cadde, No.5, Baganar Gazantep / TURKIYE	57 O4 C	04 🛛 🛛 nto@basarannail	comtr
	YOUR NAME		YOUR SURNAME	
	YOUR MAIL ADDRESS		YOUR PHONE NUMBER	
	YOUR MESSAGE			
	ERROR for site owner: Invalid domain for site key	D	$\rightarrow$	

Figure 4-1. Contact Webpage of BAŞARAN CARPET

#### 4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned website and at the facility offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

#### 4.4.3 **Responding to Local Communities and Publications for the Communities**

Authorities of the facility give full and timely responses to request, complaints and recommendations of local communities in addition to implementing the grievance mechanism



procedure. All requests are treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of grievance mechanism procedures.

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

#### 4.4.4 **Disclosure Activities**

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

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

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



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#### Stakeholder Engagement Plan

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

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

## **5 MANAGEMENT OF GRIEVANCES**

#### 5.1 Grievance and Feedback Procedure

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

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

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

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

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

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

The grievance mechanism is developed to cover the following:

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

#### 5.1.2 **Collection, Registration and Evaluation of Grievances**

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

- Initiate the grievance procedure by filling up a Grievance Register Form (see Appendix A), mainly by the SRS,
- SRS registers the grievance/comment in the grievance database (see Appendix E);
- The SRS investigates the grievance and makes the first evaluation with the help relevant Department Chief / Manager;
- $\checkmark$  Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 working days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 calendar days after the grievance is received);
- The grievance is officially closed after related documentation (Grievance Closure Form given in Appendix D) is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.



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

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

#### 5.1.3 **Feedback to the Stakeholders**

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

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

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

#### 5.1.4 **Grievance Mechanism Communication**

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

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the induction training sessions will also include the stakeholder engagement and grievance mechanism process;
- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings;

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- The grievance/suggestion boxes are available at the Project facility for internal grievances which are in use by the workers. The boxes are opened regularly and reports are kept regarding the grievances collected through the grievance/suggestion boxes; and
- All employees are aware of the location of the grievance/suggestion boxes and how to submit their grievances; the employees should be informed in case of any change regarding the location of those boxes.

For the collection of external grievances from community:

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

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

#### 5.2 Contact Details

The existing contact details of the Project is given below. The contact information regarding the assigned SRS (name and contact number/e-mail address) should be included when this Plan is updated.

 Table 5-1. Contact Details of the Project

 BAŞARAN CARPET Textile Trade and Industry Ltd. Co.

 Address: Başaran Carpet Textile Trade and Industry Ltd. Co.

 [Başaran Halı Tekstil Ticaret ve Sanayi Ltd. Şti.]

 4. Organize Sanayi Bölgesi. 3. Cadde. No:5, Başpınar 27360

 Şehitkamil/ Gaziantep- Turkey

 Telephone: +90 (342) 357 04 04

 e-mail: info@basaranhali.com.tr

 Website: www.basaranhali.com.tr

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## 6 **MONITORING**

#### 6.1 Review and Revision of this Plan

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

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

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

#### 6.2 Key Performance Indicators (KPIs)

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

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database
% of visitors that are received Visitor Training/Instructions on general site rules, especially OHS issues	100% of the visitors are received Visitor Training/Instructions	Visitors Registers
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report
% item of Social Responsibility activities that implemented	Target of 80%	Annual Reports

Table 6-1. Key Performance Indicators (KPIs)



#### 6.3 Key Monitoring Activities

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

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

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

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

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

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

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

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<ul> <li>The Project will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</li> <li>number of outstanding complaints and grievances opened in the month,</li> <li>number of complaints and grievances opened in the month and</li> </ul>	Grievance Database	Monthly	Site office

Table 6-2. Key Monitoring Activities



Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
	<ul> <li>evolution since Project start (graphic presentation),</li> <li>number of complaints grievances closed in the month; and</li> <li>type of grievance.</li> </ul>			
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Site office
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Annually	Site office

## 7 TRAININGS

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

#### 7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e. workers of contractors and/or subcontractors). The trainings will be given in the first "Induction Training" session. All employees of the Project and contractors are required to participate in community relations and human rights training.

#### 7.2 Job Specific and Other Training Requirements

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

## 8 AUDITING AND REPORTING

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

#### 8.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Responsibility Staff during the operational phase to ensure the assessment of the social responsibility program and overall stakeholder engagement. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

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

#### 8.2 Record Keeping and Reporting

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

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

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

# **APPENDICES**

Appendix A: Grievance Register Form Appendix B: Consultation Form Appendix C: Internal Grievance Form Appendix D: Grievance Closure Form Appendix E: Grievance Database Appendix F: Consultation Photos





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## Appendix A: Grievance Register Form

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

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## Appendix B: Consultation Form

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



## Appendix C: Internal Grievance Form

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



## Appendix D: Grievance Closure Form

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



## Appendix E: Grievance Database

					ance Database orting Period				
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date ar that the grievance sol				complainant ł	nas provided a name	and contact informati	on, he/sh	e will be no	otified within 5 days
** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.									

February 2022



#### **Appendix F: Consultation Photos**





February 2022







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