



**VERGO ENERJİ SİSTEMLERİ SANAYİ VE TİCARET A.Ş.**

**CAPACITY INCREASE AND GALVANIZING FACILITY INVESTMENT IN  
ADDITION TO THE EXISTING FACILITY IN MANISA/SALİHLİ ORGANIZED  
INDUSTRIAL ZONE**

**STAKEHOLDER ENGAGEMENT PLAN**

**CNR-PLN-VERGO-SEP-001**

**February 2026**

**Rev.00**



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## ABBREVIATIONS/DEFINITIONS

|                              |                                                                                                                                                |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>A.Ş.</b>                  | Incorporated Company                                                                                                                           |
| <b>AIIB</b>                  | Asian Infrastructure Investment Bank                                                                                                           |
| <b>CİMER</b>                 | Presidential Communication Center                                                                                                              |
| <b>ÇINAR/Consultant</b>      | Çınar Mühendislik Müşavirlik Anonim Şirketi                                                                                                    |
| <b>CLO</b>                   | Community Liaison Officer                                                                                                                      |
| <b>DVIG</b>                  | Disadvantaged/Vulnerable Individuals or Groups                                                                                                 |
| <b>E&amp;S</b>               | Environmental and Social                                                                                                                       |
| <b>EIA</b>                   | Environmental Impact Assessment                                                                                                                |
| <b>ESAP</b>                  | Environmental and Social Action Plan                                                                                                           |
| <b>ESF</b>                   | Environmental and Social Framework                                                                                                             |
| <b>ESMP</b>                  | Environmental and Social Management Plan                                                                                                       |
| <b>ESMR</b>                  | Environmental and Social Monitoring Report                                                                                                     |
| <b>ESS</b>                   | Environmental and Social Standard                                                                                                              |
| <b>GBV</b>                   | Gender-Based Violence                                                                                                                          |
| <b>GIIP</b>                  | Good International Industry Practice                                                                                                           |
| <b>GM</b>                    | Grievance Mechanism                                                                                                                            |
| <b>GRM</b>                   | Grievance Redress Mechanism                                                                                                                    |
| <b>HR</b>                    | Human Resources                                                                                                                                |
| <b>IFC</b>                   | International Finance Corporation                                                                                                              |
| <b>ILO</b>                   | International Labour Organization                                                                                                              |
| <b>İŞKUR</b>                 | Turkish Employment Agency                                                                                                                      |
| <b>KPI</b>                   | Key Performance Indicator                                                                                                                      |
| <b>KVKK</b>                  | Personal Data Protection Law                                                                                                                   |
| <b>MoM</b>                   | Minutes of Meetings                                                                                                                            |
| <b>NGO</b>                   | Non-Governmental Organization                                                                                                                  |
| <b>No.</b>                   | Number                                                                                                                                         |
| <b>OHS</b>                   | Occupational Health and Safety                                                                                                                 |
| <b>OIP</b>                   | Other Interested Parties                                                                                                                       |
| <b>OIZ</b>                   | Organized Industrial Zone                                                                                                                      |
| <b>PAP</b>                   | Project Affected Parties                                                                                                                       |
| <b>Project</b>               | Capacity Increase and Galvanizing Facility Investment in Addition to the Existing Facility in Manisa Salihli Organized Industrial Zone Project |
| <b>Project Owner / Vergo</b> | Vergo Enerji Sistemleri Sanayi ve Ticaret Anonim Şirketi                                                                                       |
| <b>PS</b>                    | Performance Standards                                                                                                                          |
| <b>SEA</b>                   | Sexual Exploitation and Abuse                                                                                                                  |
| <b>SEA/SH</b>                | Sexual Exploitation and Abuse / Sexual Harassment                                                                                              |
| <b>SEP</b>                   | Stakeholder Engagement Plan                                                                                                                    |
| <b>SH</b>                    | Sexual Harassment                                                                                                                              |
| <b>TKYB</b>                  | Türkiye Kalkınma ve Yatırım Bankası                                                                                                            |
|                              | Development and Investment Bank of Türkiye                                                                                                     |
| <b>WGM</b>                   | Workers' Grievance Mechanism                                                                                                                   |



|                                    |               |                              |
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**YİMER**

Foreigners Communication Center



|                                    |               |                              |
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## 1 INTRODUCTION AND PROJECT SUMMARY

Vergo Enerji Sistemleri Sanayi ve Ticaret Anonim Şirketi (A.Ş.) (hereinafter referred to as “Vergo” or the “Project Owner”) plans to implement a Capacity Increase and Galvanizing Facility Investment in Addition to the Existing Facility in Manisa Salihli Organized Industrial Zone (OIZ) (the “Project”)

Within the scope of the Project investment, the Project Owner signed a loan agreement with the Türkiye Development and Investment Bank (TKYB) on 9 January 2026. As one of the conditions of the loan provided by TKYB, the Project Owner is obliged to fulfil the requirements of the Environmental and Social Action Plan (ESAP) prepared by the Bank.

In this context, in accordance with TKYB’s Environmental and Social Policies, a consultancy agreement was signed on 16 January 2026 between the Project Owner and Çınar Mühendislik Müşavirlik A.Ş. (ÇINAR) for the preparation of Environmental and Social (E&S) management plans in compliance with national legislation and international standards, as well as for the implementation of related monitoring activities.

Within the scope of the ESAP prepared by TKYB for the Project on 29.12.2025, it has been deemed appropriate to prepare an Environmental and Social Management Plan (ESMP), together with the following subsidiary management plans and reports:

- Waste Management Plan,
- Water and Wastewater Management Plan,
- Occupational Health and Safety Management Plan,
- Emergency Action Plan,
- Stakeholder Engagement Plan and Grievance Mechanism,
- Traffic Management Plan.

In addition, throughout the loan tenor, E&S monitoring activities shall be carried out on a semi-annual basis during both the construction and operation phases. Environmental and Social Monitoring Reports (ESMRs) covering the findings of the monitoring activities and the corrective and preventive actions to be taken in response to these findings shall be prepared accordingly.

### 1.1 Overview

The Stakeholder Engagement Plan (SEP) prepared for the Project is designed to cover the Project from preparation and planning through construction and operation phases. This Project-specific SEP has been prepared as a public document open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

Vergo invites its stakeholders to actively participate in the development of this SEP into an interactive and dynamic document. Project Owner welcomes feedback on the proposed engagement process.

### 1.2 Objectives and Scope of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism through which people can raise concerns, provide feedback or lodge complaints about project activities or any project-related activity.

The primary objective of the SEP is to ensure the participation of all interested parties, including individuals, groups and organizations that may be affected by or have an interest in the project. It ensures that there is a continuous flow of information between these stakeholders and the



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project throughout the project period. The overall objectives of the SEP include:

- Disclose appropriate project information on E&S risks and impacts in a timely, understandable, accessible and appropriate manner and format,
- Identify stakeholders directly or indirectly affected by or interested in the project, including vulnerable/disadvantaged individuals/groups,
- Planning and implementation of inclusive stakeholder engagement activities from project preparation and planning to construction and operation phases,
- Determining the frequency and scope of information as well as the content of consultation activities,
- Establish a Grievance Redress Mechanism (GRM) to facilitate open communication with stakeholders throughout the life cycle of the project,
- Ensuring that concerns and expectations raised by stakeholders are considered in stakeholder consultations and project decision-making and planning stages.

The first aspect of the SEP is meaningful consultation. Meaningful consultation;

- starts early in the project planning phase to guide project design.
- promotes stakeholder feedback, particularly to inform project design and involve stakeholders in identifying and addressing environmental and social risks and impacts.
- continues a regular basis as risks and impacts emerge.
- is based on the advance disclosure and dissemination of sufficient, relevant, clear, open, impartial, meaningful and easily accessible information within a timeframe that allows for meaningful consultations with stakeholders. This information is presented in a culturally appropriate format, in the relevant local language(s) and in a manner that is understandable to stakeholders.
- takes stakeholder concerns and questions into account and responds to feedback.
- actively support inclusive engagement with project affected parties.
- is free from external manipulation, interference, coercion, discrimination and intimidation. Minutes of consultations are prepared and made public.

This Project-specific SEP is intended as a public document, open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

### 1.3 Project Information, Location and Area of Influence

Vergo plans to establish an Additional Galvanizing Coating Process Facility within the boundaries of Manisa Salihli OIZ, at 307 Street, No. 13, on the land registered under cadastral references Sheet K20-C-22-C-4, Block 107, Parcel 6, and Block 108, Parcel 2.

The Project is located within a total area of 65,256.49 m<sup>2</sup>, of which 23,704.98 m<sup>2</sup> is covered area. In addition to the existing production activities, the planned galvanizing coating unit will have a total capacity of 2,254.55 m<sup>3</sup>, comprising 16 process baths.

The satellite image of the Project area and the parcels is provided in Figure 1-1.



|                             |               |                       |
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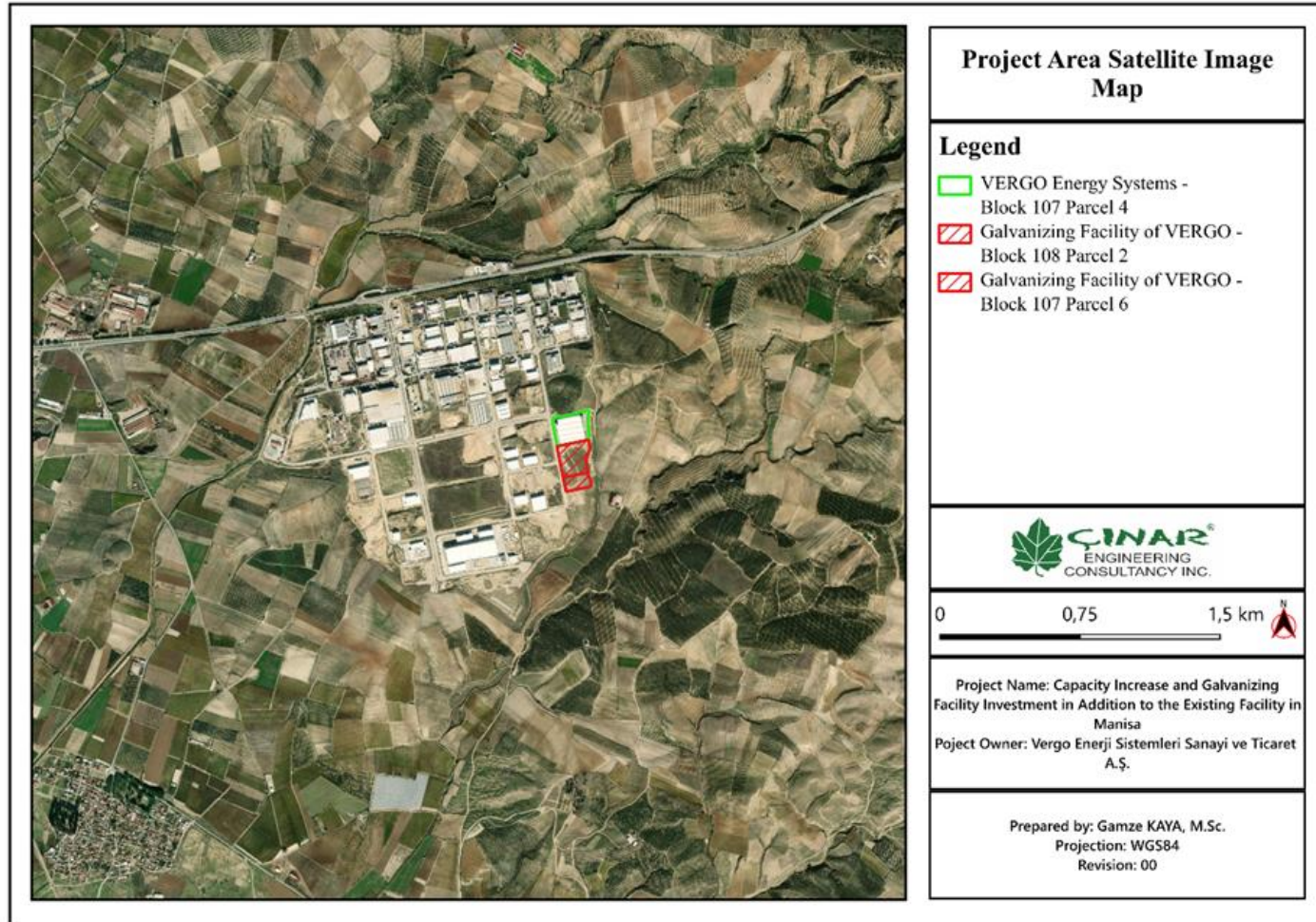


Figure 1-1. Satellite Image of Project Area and Parcels

|                                    |               |                              |
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#### 1.4 Potential Project Impacts and Summary of Mitigations

The potential environmental and social risks and impacts that may arise during the construction and operation phases of the Project are summarized in Table 1-1. The importance of the identified impacts and risks has been evaluated using the following approach. In this process, the location of the Project area, the sensitivities of the receptors within the impact area, the distance to sensitive receptors, and the magnitude of the impacts and risks (criteria such as scope, duration, frequency, and reversibility) have been considered.

**High:** The impacts and risks are considered to be significant. It is mandatory to implement impact reduction and mitigation measures to lower the level of significance before proceeding with the Project.

**Medium:** The impacts and risks are unlikely to be the primary decision-making factors. However, their cumulative effects, if they lead to an increase in the overall negative impact on a specific receptor, could influence the decision-making process. Impact reduction and mitigation measures will be implemented to lower the significance of the impact.

**Low:** The impacts and risks are unlikely to take a critical role in the decision-making process, but they may emerge as important local factors for improving the project's design in the future. Compliance with standards and safety criteria is considered sufficient to proceed.

**Negligible:** The impacts are below the threshold of perception and, therefore, are considered acceptable under normal operational procedures.

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Table 1-1. Environmental and Social Risks and Impacts of the Construction and Operation Phases of the Project

| Issue                                  | Construction Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |               | Operation Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                        | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Significance* | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Significance* |
| Waste Management and Resource Use      | <ul style="list-style-type: none"> <li>Use of raw materials and energy due to construction activities,</li> <li>Potential impacts that may lead to environmental pollution and health and safety risks for workers and the community as a result of inadequate management of hazardous and non-hazardous solid wastes,</li> <li>Additional burden on waste management facilities in the vicinity of the Project Area in the absence of good management practices and effective waste management.</li> </ul>                                                                                                                                                                                                                                                                                                         | Low           | <ul style="list-style-type: none"> <li>Potential environmental pollution and occupational health and safety risks for workers and the surrounding community arising from inadequate management of process-specific hazardous wastes generated during galvanizing activities, including zinc-containing residues, spent acids, flux wastes, and chemically contaminated materials,</li> <li>Soil and water contamination risks due to improper storage, handling, or disposal of hazardous wastes containing heavy metals and acidic or alkaline substances associated with surface treatment and galvanizing processes,</li> <li>Secondary environmental and health risks related to accidental spills, leakages, or improper handling of hazardous chemicals and wastes, potentially affecting on-site personnel and nearby receptors,</li> <li>Additional burden on waste management facilities in the vicinity of the Project Area in the absence of good management practices and effective waste management.</li> </ul>                                          | Moderate      |
| Environmental Noise Management         | <ul style="list-style-type: none"> <li>Increase in noise and vibration from construction activities.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Moderate      | <ul style="list-style-type: none"> <li>Since the galvanizing process will be carried out within an enclosed area, the generation of process-related noise is not expected to be significant. However, temporary noise generation may occur due to maintenance and repair activities of certain machinery.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Low           |
| Air Quality Management                 | <ul style="list-style-type: none"> <li>Increase in dust emissions due to excavation works</li> <li>Exhaust gas emissions due to the operation of construction machinery/equipment and subsequent risk of air pollution.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Moderate      | <ul style="list-style-type: none"> <li>Although limited air emissions, such as acid fumes and metal oxide vapors, may be generated during galvanizing activities, the process will be carried out within enclosed areas equipped with local exhaust ventilation and emission control systems. Therefore, expected air quality impacts are under normal operating conditions,</li> <li>Combustion-related emissions associated with the use of natural gas (e.g. NOx, CO) are expected to remain at relatively low levels, and considering the total thermal capacity of 3 MW, impacts regional air quality.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                | Low           |
| Water and Wastewater Management        | <ul style="list-style-type: none"> <li>Increased water consumption associated with construction activities, including concrete works, dust suppression, equipment cleaning, and domestic use by construction workers.</li> <li>Generation of domestic wastewater from site offices, worker accommodation, toilets, and washing facilities.</li> <li>Potential generation of construction-related wastewater from equipment washing, concrete washout, and site cleaning activities.</li> <li>Risk of soil and surface water contamination due to accidental spills, leakages, or improper storage of fuels, oils, chemicals, and construction materials.</li> <li>Potential pollution of groundwater and nearby surface waters due to inadequate wastewater management or malfunctioning septic systems.</li> </ul> | Low           | <ul style="list-style-type: none"> <li>Continuous water consumption for process-related activities such as rinsing after pickling, cooling and passivation after galvanizing, chemical solution preparation, equipment cleaning, and general housekeeping.</li> <li>Generation of domestic wastewater from administrative and operational personnel, including toilets, washbasins, showers, and cafeteria facilities.</li> <li>Generation of industrial wastewater containing heavy metals (notably zinc), acidic components, suspended solids, and chemical residues arising from pickling rinses, flux bath overflows, cooling/passivation waters, and floor washing.</li> <li>Risk of surface water and groundwater pollution in the event of insufficient treatment, accidental discharges, or leakage from wastewater collection and storage systems.</li> <li>Potential cumulative impacts on local water resources due to long-term water abstraction and wastewater discharge if not managed in line with regulatory and international standards.</li> </ul> | High          |
| Community Health, Safety, and Security | <ul style="list-style-type: none"> <li>Increased risk of traffic accidents due to construction related activities and resulting negative impact on the flow of daily life,</li> <li>Risks that may arise in emergency situations,</li> <li>Risks that may arise as a result of security personnel not being appropriate, not receiving the necessary training and not fulfilling their duties correctly,</li> <li>The possibility of unauthorized access as a result of the lack of fencing, barriers, etc. in the project area,</li> <li>Increased air, water and soil pollution and increased noise levels in case management plans are not effectively implemented.</li> </ul>                                                                                                                                   | Moderate      | <ul style="list-style-type: none"> <li>Communication problems with stakeholders in case of inadequate management of stakeholder engagement,</li> <li>Risks that may arise in emergency situations,</li> <li>Risks that may arise as a result of security personnel not being suitable, not receiving the necessary training and not fulfilling their duties correctly,</li> <li>The possibility of unauthorized access as a result of the lack of fencing, barriers, etc. in the project area,</li> <li>Increased air, water and soil pollution and increased noise levels in case management plans are not effectively implemented.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                       | Low           |
| Traffic Management                     | <ul style="list-style-type: none"> <li>An increase in heavy vehicle traffic may occur due to the transportation of construction materials and the movement of equipment and construction machinery,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Moderate      | <ul style="list-style-type: none"> <li>Since the facility will be located within an Organized Industrial Zone (OIZ), traffic generated during the operation phase will utilize the existing OIZ internal road</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Low           |

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| Issue                                     | Construction Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               | Operation Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                           | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Significance* | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Significance* |
|                                           | <ul style="list-style-type: none"> <li>Maneuverings of construction vehicles and inadequate traffic arrangements within the work area may pose risks to pedestrian safety. Risk of accidents due to lack of sufficient pedestrian pathways around the construction site,</li> <li>Vehicles, machinery, and equipment used during construction activities may generate noise and vibration,</li> <li>Dust generation and exhaust emissions from vehicles operating at the construction site may deteriorate ambient air quality. Health risks due to dust particles, particularly to sensitive receptors.</li> <li>Overloading of existing roads and deterioration of road surfaces use of heavy construction vehicles result in increasing maintenance requirements and causing transportation difficulties for local residents.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               | <p>network. Therefore, no significant additional traffic impact on the surrounding road infrastructure is expected. However, limited traffic generation may occur due to the use of personnel service vehicles, supplier deliveries, and occasional maintenance or logistics-related movements. These movements are expected to be intermittent and manageable within the existing traffic capacity of the OIZ and are not anticipated to cause a noticeable increase in traffic congestion.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |               |
| Hazardous Material Management             | <ul style="list-style-type: none"> <li>Risk of soil and surface water contamination due to potential spills and leakages during the storage and transfer of paints, solvents, fuels, oils, hydraulic fluids, and other chemicals used within the scope of construction activities.</li> <li>Risk of fire, explosion, or chemical reactions resulting from the improper storage of hazardous substances temporarily kept at the construction site</li> <li>Potential environmental contamination caused by fuel and oil leakages from construction machinery infiltrating the soil and drainage systems.</li> <li>Risk of chemical release and potential health and safety impacts on third parties in the event of traffic accidents during the transportation of hazardous materials.</li> <li>Increased environmental risks and hazardous waste generation resulting from the improper storage of hazardous material packaging, waste oils, contaminated rags, and filters.</li> <li>Risk of fire and environmental damage due to the improper management of flammable and combustible substances (e.g., fuel, solvents).</li> <li>Risk of misuse and accidents due to improper labeling of chemicals or the absence of Safety Data Sheets (SDS).</li> <li>Risk of groundwater and soil contamination due to inadequate secondary containment and insufficient impermeability measures in temporary construction site areas, as well as uncontrolled pollutant spread in case of inadequate spill response and emergency equipment.</li> </ul> | Low           | <ul style="list-style-type: none"> <li>Generation of hazardous waste/wastewater from chemical baths (acidic, metal/oil-containing, high conductivity, etc.) and the associated treatment requirements.</li> <li>Risk of contamination of soil and infrastructure due to potential spills and leakages during chemical storage and transfer operations.</li> <li>Generation of packaging waste (contaminated drums/IBCs, containers, etc.) arising from chemical use and the associated risk of secondary contamination.</li> <li>Risk of soil and groundwater contamination due to bath leakages or overflows.</li> <li>Risk of cross-contamination between process stages due to improper chemical management.</li> <li>Local odor/irritation and the need for air emission management due to flux vapors/aerosols.</li> <li>Generation of dross/slag and metal-containing hazardous/special waste from regularly removed surface oxides and residues.</li> <li>Risk of contamination due to spills during storage and transfer of zinc and auxiliary chemicals.</li> <li>Risk of leakage/spillage and improper disposal resulting from inadequate storage of chemicals and waste, including risks associated with the mixing of incompatible wastes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                   | High          |
| Occupational Health and Safety Management | <ul style="list-style-type: none"> <li>Noise and Vibration: Exposure to high levels of noise and vibration arising from construction machinery, concrete cutting, steel erection, and equipment installation activities.</li> <li>Working at Height: Risk of falls during steel structure assembly, installation of galvanizing line platforms, and stack and scrubber installation works.</li> <li>Falling Objects: Risk of falling materials during heavy equipment installation and crane lifting operations.</li> <li>Heavy Lifting and Installation: Crushing and pinch-point hazards during placement of galvanizing tanks, press lines, and large production equipment.</li> <li>Welding and Hot Works: Risk of fire and burns during steel fabrication, tank installation, and piping works.</li> <li>Electrical Hazards: Risk of electric shock due to temporary site electrical lines and panel connections.</li> <li>Chemical Exposure: Risks arising from paints, solvents, fuels, and other chemicals used during construction activities.</li> <li>Construction Traffic and Mobile Equipment: Collision risks associated with forklift, mobile crane, and heavy vehicle movements.</li> </ul>                                                                                                                                                                                                                                                                                                                                      | High          | <ul style="list-style-type: none"> <li>Machinery and Equipment Hazards: Crushing, entanglement, cutting, and pinch-point risks arising from W-beam press lines, length cutting machines, conveyor/monorail systems, and cranes.</li> <li>Hot Surfaces and Molten Metal Risk: Burn and splashing hazards associated with the galvanizing kettle (molten zinc), drying ovens, and other hot surfaces.</li> <li>Chemical Exposure: Skin, eye, and respiratory exposure risks arising from hydrochloric acid baths, flux tanks, passivation chemicals, and treatment chemicals.</li> <li>Acid Fumes and Metal Fumes: Exposure to vapors and fumes generated from acid tanks and the galvanizing kettle.</li> <li>Electrical Hazards: High-voltage risks associated with galvanizing line control panels, motors, compressors, and production lines.</li> <li>Fire and Explosion Risk: Risks arising from natural gas-fired furnace systems, electrical faults, and hot work activities.</li> <li>Slips and Falls: Fall hazards due to chemical spills, oil contamination, or wet surfaces.</li> <li>Confined Space Risks: Risk of gas accumulation and oxygen deficiency during tank maintenance, wastewater treatment unit operations, and pit/channel works.</li> <li>Ergonomic Risks: Musculoskeletal disorders resulting from manual handling of heavy profiles and W-beam components and repetitive operator movements.</li> <li>Psychosocial Risks: Work-related stress arising from production targets, shift work, and continuous maintenance requirements.</li> <li>Natural Hazards: Potential impacts of earthquakes, fires, or extreme weather events on facility infrastructure.</li> </ul> | High          |
| Labor and Working Conditions              | <ul style="list-style-type: none"> <li>All employees work under equal and fair conditions,</li> <li>Participation of all employees in disclosure processes,</li> <li>Employees have signed the Code of Conduct,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Moderate      | <ul style="list-style-type: none"> <li>All employees work under equal and fair conditions,</li> <li>Participation of all employees in disclosure processes,</li> <li>Employees have signed the Code of Conduct,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Low           |

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| Issue                                                  | Construction Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               | Operation Phase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |               |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|                                                        | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Significance* | Risks and Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Significance* |
|                                                        | <ul style="list-style-type: none"> <li>Informing employees about gender-based violence, sexual exploitation and abuse, sexual harassment and discrimination,</li> <li>Ensuring participation in environmental trainings along with mandatory Occupational Health and Safety (OHS) trainings,</li> <li>Actively initiating Workers' Grievance Mechanism.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |               | <ul style="list-style-type: none"> <li>Informing employees about gender-based violence, sexual exploitation and abuse, sexual harassment and discrimination,</li> <li>Ensuring participation in environmental trainings together with mandatory OHS trainings,</li> <li>Maintaining an active Workers' Grievance Mechanism.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |
| Stakeholder Engagement and Grievance Mechanism Redress | <ul style="list-style-type: none"> <li>Establishing a Project-specific website and contact addresses,</li> <li>Announcement of all communication channels,</li> <li>Effective and transparent management of all communication channels,</li> <li>Identification of stakeholders and particularly vulnerable groups,</li> <li>Identifying communication and engagement methods specific to stakeholders and vulnerable groups,</li> <li>Establishing an appropriate environment for regular information and consultation processes,</li> <li>Establishing a calendar and budget for meetings and processes,</li> <li>Creation of informative documents and documents about the project,</li> <li>Establishing a Grievance Mechanism prior to construction and announcement to all stakeholders,</li> <li>Actively initiating the Workers' Grievance Mechanism.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Moderate      | <ul style="list-style-type: none"> <li>Maintaining the Project-specific website and contact addresses up to date,</li> <li>Effective and transparent management of all communication channels,</li> <li>Compiling feedback from stakeholders and particularly vulnerable groups,</li> <li>Develop and diversify communication and engagement methods specific to stakeholders and vulnerable groups,</li> <li>Establishing an appropriate environment for regular information and consultation processes,</li> <li>Establishing a calendar and budget for meetings and processes,</li> <li>Updating informative documents and documents about the project,</li> <li>Maintaining the Grievance Mechanism,</li> <li>Maintaining the Workers' Grievance Mechanism.</li> </ul> | Low           |
| Biodiversity Management**                              | <ul style="list-style-type: none"> <li>The Project Area is located within a highly modified habitat characterized by agricultural land use, and the entire area is subject to intense anthropogenic pressure. As the Project Area and its immediate surroundings are influenced by the Organized Industrial Zone (OIZ) and ongoing agricultural activities, no intact natural habitat integrity is present. The nearest nationally and internationally important areas to the Project Site include the Gölmarmara Nationally Important Wetland, located approximately 20 km from the Project Area, the Marmara Lake Key Biodiversity Area (KBA) at a distance of approximately 24.5 km, and the Bozdağlar Key Biodiversity Area (KBA) located approximately 3.5 km from the Project Site. However, construction activities will be strictly limited to the Project Area, and there is no ecological, hydrological, or physical connectivity between the Project Site and these areas. Potential impacts during the construction phase, including noise, dust, and human activities, are expected to be localized, temporary, and limited in nature, and are not anticipated to result in permanent habitat loss, population decline, or changes in species composition of the existing flora and fauna. Accordingly, the biodiversity impacts associated with the construction phase are assessed to be low.</li> </ul> | Negligible    | <ul style="list-style-type: none"> <li>During the operation phase, all activities will be carried out within the existing facility footprint and in accordance with OIZ conditions; therefore, no additional land take, encroachment into natural areas, or habitat loss is anticipated. As the surroundings of the Project Area are already characterized by agricultural land use and industrial activities, the operation of the facility is not expected to impose any additional or increasing pressure on local flora and fauna.</li> </ul>                                                                                                                                                                                                                          | Negligible    |
| Cultural Heritage Management**                         | <ul style="list-style-type: none"> <li>Since the Project will be located within an existing OIZ, which has previously been developed and designated for industrial use, no significant impacts on known cultural heritage assets are anticipated during either the construction or operation phases. The Project Area does not include any registered archaeological sites or protected cultural assets. However, it is unlikely that previously unknown cultural heritage remains are encountered during construction activities</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Negligible    | <ul style="list-style-type: none"> <li>The Project is not expected to pose any risk to known or unknown cultural heritage assets during the operation phase.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Negligible    |

\*The significance rating of the relevant impact and/or risk is represented in **red**, **orange**, **yellow** and **green** colors under four categories: high, medium, low and negligible, respectively.

\*\*As biodiversity and cultural heritage issues are assessed as being of a relatively low-risk category, they have been partially addressed within the scope of the Plan.

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The Project area is located near a residential area, making the management of environmental and social impacts even more critical. It is of utmost importance to avoid cumulative impacts in terms of environmental and social components, especially in terms of the prevention of air, water, soil and noise pollution and public health, safety and security. It is also recommended that appropriate landscaping and landscaping practices are implemented to enhance environmental harmony by preserving the visual aesthetics of the project area. These approaches are critical both to ensure environmental sustainability and to increase social acceptance of the project.

Information on potential environmental and social impacts, mitigation measures, implementation responsibility, monitoring procedure, monitoring responsibility, budget and timeframe for the pre-construction, construction, operation and decommissioning phases of the Project are included in the Project-specific Environmental and Social Management Plan (ESMP) (CNR-PLN-VERGO-ESMP-001).

The mitigation measures/improvements to be implemented across the categories of environmental and social risks identified in Table 1-1 above are summarized as follows:

- The Stakeholder Engagement Plan and Grievance Redress Mechanism will be announced in the pre-construction period and feedback will be received from stakeholders.
- Project Grievance Redress Mechanism will be effectively implemented. It will be shared with external stakeholders in the area of impact and necessary information will be provided. All external grievances will be recorded and managed in accordance with the procedure, and the entire grievance management process will be recorded and closed.
- If any comments or complaints regarding environmental and social impact are received through the Grievance Redress Mechanism, the matter will be evaluated, and necessary corrective and preventive actions will be implemented.
- Engagement with local communities and stakeholders around the project area will be undertaken to understand concerns and gather feedback on issues related to environmental and social impact.
- In case of emergencies arising from Project works or construction site that may pose a risk to the community, the local community will be informed using appropriate means (e.g. phone call, face-to-face meeting).
- The construction area and access roads will be assessed taking into account sensitive receptors in the vicinity. Safety and traffic signs will be visibly placed on access roads near and around the project site.
- Information signs will be posted about situations that may threaten public health and emergency contact information will be available on the project area.
- Where necessary, measures and systems for cooperation with local communities and other external parties, including local government institutions and the media, will be implemented.
- Community representatives will be contacted to plan traffic taking into account the daily life of the community. Communities will be informed about the construction program, the activities to be carried out and the safety measures taken through appropriate means such as meetings, brochures, announcements, signage, etc.
- Compliance of contractor and subcontractor activities with legal regulations and the Project Owner's Environmental and Social Management System will be included in the contract terms.
- They will start work by signing the Code of Conduct document, including employees in the contractor and subcontractors. These documents will be drafted to include preventive measures for gender-based violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and discrimination.

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- The elimination of discrimination, child labor and forced labor will be ensured for all workers.
- Project employees will use the Workers' Grievance Mechanism (WGM) to raise concerns or suggestions regarding working conditions and workplace. WGM is defined as the mechanism that receives grievances from Project employees (including both direct and indirect employees).
- Employees will have a variety of ways to raise grievances. The grievance resolution will ideally involve the participation of the worker representative. To facilitate the process, workers will be provided with a grievance box where they can submit their wishes, requests and grievance forms.



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## 2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

### 2.1 Overview

This Project-specific SEP is intended as a public document, open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

The SEP consists of the following components:

- Explanation of the objectives of the SEP,
- A brief description of the project,
- An overview of relevant stakeholder engagement standards
- A summary of previous stakeholder engagement activities undertaken by the Project to date,
- Identification and categorization of project stakeholders,
- Plan for future Stakeholder Engagements (focus, timing, target groups),
- Defining modalities for future engagement,
- Roles and responsibilities for effective implementation of the SEP,
- Grievance Mechanism to communicate and address complaints and feedback from external and internal stakeholders,
- Monitoring and reporting tools.

### 2.2 Applicable Guidelines and Standards

The SEP has been developed to comply with both national legal requirements and international standards. The main documents to be followed within the scope of national legislation are as follows:

- Constitution of the Republic of Türkiye
- Right to Information Act
- Right of Petition, Right to Information and Appeal to the Ombudsperson
- Personal Data Protection Law (KVKK)

TKYB announced its perspective on maintaining environmental and social sustainability and mitigating and managing negative impacts and risks arising from its operations to its stakeholders with the TKYB Environmental and Social Policy dated January 2020. This policy is taken as a basis in all services and activities financed by the Bank.

In addition, the “Environmental and Social Risk Evaluation Procedure in Credit Process”, which was prepared in order to evaluate the environmental and social risks of the requested loans and to ensure that the issue is managed effectively in line with the Bank’s strategy, is implemented for each project.

Project activities shall be carried out in accordance with Good International Industry Practice (GIIP), including the International Finance Corporation (IFC) Performance Standards (PSs) and the Asian Infrastructure Investment Bank (AIIB) Environmental and Social Standards (ESSs), as well as applicable national environmental and occupational health and safety (OHS) legislation.

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IFC has established Environmental and Social Performance Standards to define its customers' responsibilities for managing their environmental and social risks. During the investment and operation periods, the borrower must comply with these standards. IFC Performance Standards (2012) are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution prevention
- PS4: Community Health, Safety, and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Biodiversity Conservation and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

PS5 and PS7 are not applicable to this Project.

Also, AIIB has an Environmental and Social Framework (ESF) which was first published at 2019 and recently updated in June 2024 (An update to the AIIB's ESF was approved on June 26, 2024, introducing provisions for the newly approved Climate Policy-based Financing instrument). The ESF enhances the AIIB commitment to sustainable development through three (3) ESSs that are designed to support Borrowers' E&S risk management. The ESF enables Borrowers to better manage Project risks as well as improve environmental and social performance, consistent with good international practices<sup>1</sup>. The ESSs, which are similar with the IFC's PSs, are listed below:

- ESS 1: Environmental and Social Assessment and Management
- ESS 2: Land Acquisition and Involuntary Resettlement
- ESS 3: Indigenous Peoples

ESS2 and ES3 are not applicable to this Project.

The Project Owner's organizational policies and procedures are given as follows:

- Quality Policy
- Environmental Policy
- Occupational Health and Safety Policy
- Human Resources Policy
- Energy Policy

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<sup>1</sup> AIIB Environmental and Social Framework (2024),

<https://www.aiib.org/en/policies-strategies/framework-agreements/environmental-social-framework.html>

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## **2.2.1 National Requirements**

### **2.2.1.1 Constitution of the Republic of Türkiye**

According to the Constitution of the Republic of Türkiye<sup>2</sup> and the Environmental Impact Assessment (EIA) Regulation dated 29.07.2022 and numbered 31907<sup>3</sup>, fundamental rights and freedoms, access to information, being informed about ongoing projects and stakeholder participation are guaranteed.

The requirements of the Constitution of the Republic of Türkiye are presented in relation to the Project's stakeholder engagement and disclosure processes in APPENDICES – Constitution of the Republic of Türkiye.

#### **2.2.1.2 TKYB Requirements**

The Bank's mission is to help structural transformation in line with sustainable development priorities by meeting the financing and advisory needs of investors, and to work to contribute to the spread of capital to the grassroots. In accordance with this purpose, the Bank's sustainability principles<sup>4</sup> and their relationship with the Project are presented in APPENDICES – TKYB Requirements.

## **2.2.2 International Requirements**

The IFC PSs and AIIB ESSs are presented in APPENDICES – International Requirements in relation to the Project's stakeholder engagement and disclosure processes.

## **2.2.3 Applicable Policies and Practices of the Project Company**

The Project Owner's corporate policies and procedures in relation to the Project's stakeholder engagement and disclosure processes are presented in APPENDICES – Vergo Certificates.

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<sup>2</sup> Ministry of Interior of the Republic of Türkiye. Constitution of the Republic of Türkiye.

<https://www.icisleri.gov.tr/kurumlar/icisleri.gov.tr/lcSite/illeridaresi/Mevzuat/Kanunlar/Anayasa.pdf>

<sup>3</sup> Presidency of the Republic of Türkiye Legislation Information System. Environmental Impact Assessment Regulation.

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=39647&MevzuatTur=7&MevzuatTertip=5>

<sup>4</sup> TKYB, Sustainability Principles.

<https://kalkinma.com.tr/en/about-us/environmental-development/environmental-and-social-policies>

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### 3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

#### 3.1 Methodology

Stakeholder engagement is a continuous and dynamic process that should be initiated prior to the development of this SEP and continue throughout the life of the project. The project proponent is committed to maintaining active and ongoing communication with identified stakeholders. The primary objective of the SEP is to provide stakeholders with prompt and adequate information on adverse impacts and risks associated with the project, while ensuring that they have comprehensive access to express their grievances and raise concerns. In particular, this commitment includes sharing information on social and environmental risks and adverse impacts and providing a channel for raising concerns and grievances.

Where significant changes to the Project occur, and where new risks and impacts arise that are likely to affect affected parties, the Project proponent will ensure that relevant information on these changes, risks and impacts is communicated to affected parties. In addition, the Project proponent will consult with affected parties to collaboratively develop strategies to mitigate these new risks and impacts.

This commitment to continuous engagement and transparent communication emphasizes the importance of addressing stakeholder concerns, ensuring accountability and adapting to changing circumstances for the benefit of the project and its stakeholders.

Stakeholders are individuals or groups or Other Interested Parties who may be directly or indirectly affected by a project.

These stakeholders are summarized as follows:

*Project Affected People (PAP): This term refers to people who are likely to be exposed to impacts or potential risks to their physical environment, health, safety, cultural practices, well-being, livelihoods or otherwise as a result of the project. These stakeholders may be individuals or groups, including local communities.*

*Other Interested Parties (OIP): This term refers to individuals, groups or organizations with an interest in the project. This interest may arise from issues related to the location, characteristics, impacts or public interest of the project. Examples of such parties include regulators, government officials, the private sector, the scientific community, academics, trade unions, women's organizations, other non-governmental organizations and cultural groups.*

*Disadvantaged or Vulnerable Individuals or Groups (DVIG): This term refers to individuals or groups who are at higher risk of being adversely affected by the impacts of a project and who may face more constraints than others in enjoying the benefits of a project. Such individuals or groups are also more prone to exclusion from the normal consultation process or limitations in their ability to participate fully. As a result, they may need special measures and assistance for effective participation. This approach will take into account age-related factors, including both older people and minors, particularly where they may be separated from their families, communities or other individuals on whom they depend.*

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### 3.2 Project Affected People and Other Interested Parties

Project Affected People (PAP) and Other Interested Parties (OIP) affected by the project will differ depending on the project phase.

Vergo plans to establish an Additional Galvanizing Coating Process Facility within the boundaries of Manisa Salihli OIZ, at 307 Street, No. 13, on the land registered under cadastral references Sheet K20-C-22-C-4, Block 107, Parcel 6, and Block 108, Parcel 2. Environmental impacts during the construction and installation phases of the Project may affect the companies and settlements near the Project area.

Table 3-1 provides definitions of stakeholders.

*Table 3-1. Stakeholders of the Project*

| Stakeholders                                                                                                          | PAP / OIP / DVIG | Relationship | Interest / Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------|------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project Workers                                                                                                       | PAP              | Direct       | Both Project management and contractor/subcontractor employees are the main stakeholders of the Project. Employees in the supply chain as well as employees of service providers should be included in all information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and WGM.                                                                                                                                                                                                                                                              |
| Disadvantaged Workers                                                                                                 | DVIG             | Direct       | Persons with disabilities and individuals with chronic diseases who may be involved in the Project may be vulnerable to the Project's environmental impacts, OHS and traffic management. Migrants and employees with different languages who may be employed in the Project may be disadvantaged in terms of participation in information and consultation processes. Employees in the supply chain as well as employees of service providers should be included in all information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and WGM. |
| Mersinli Neighborhood<br>Mevlütü Neighborhood<br>Torunlu Neighborhood<br>Yeşilova Neighborhood<br><br>Local Community | PAP              | Direct       | It is a settlement located near the Project area. Questions and opinions on Project activities can be submitted. Participation in consultation should be ensured through neighborhood mukhtars. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.                                                                                                                                                                                                                              |
| Salihli District<br><br>Local Community                                                                               | PAP              | Indirect     | It is a settlement located near the Project area. Questions and opinions on Project activities can be submitted. Participation in consultation should be ensured through neighborhood mukhtars. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.                                                                                                                                                                                                                              |
| Mersinli Neighborhood<br>Mevlütü Neighborhood<br>Torunlu Neighborhood                                                 | OIP              |              | It may be the official reference point for questions and comments from the local community on Project activities. It will therefore be able to generate interest in Project activities.                                                                                                                                                                                                                                                                                                                                                                                                                 |

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| Stakeholders                                                                  | PAP / OIP / DVIG | Relationship | Interest / Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------|------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Yeşilova Neighborhood<br>Mukhtars                                             |                  |              | The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                                                                                                                                                                                                                            |
| Salihli Organized Industrial Zone Directorate                                 | OIP              |              | The project site is located within the Salihli OIZ. The Directorate may serve as the official point of contact for inquiries and opinions from neighboring facilities or the local community regarding project activities. Therefore, they may be interested in the Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM. |
| Companies located within the Salihli Organized Industrial Zone                | OIP              |              | The project site is located within the Salihli OIZ. These companies may submit their questions and opinions regarding project activities. Therefore, they may be interested in Project activities. These companies should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                          |
| Salihli Municipality                                                          | OIP              |              | The project is located within the borders of Salihli. It may be the official reference point for questions and comments from the local community. Therefore, they may be interested in Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                              |
| Salihli District Governorship                                                 | OIP              |              | It can be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                         |
| Salihli District Directorate of Agriculture and Forestry                      | OIP              |              | It may be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                         |
| Salihli Chamber of Agriculture                                                | OIP              |              | It can be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                         |
| Manisa Provincial Directorate of Environment, Urbanization and Climate Change | OIP              |              | It may be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities.<br>The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                         |
| Turkish Employment Agency (İŞKUR) Manisa Provincial Directorate               | OIP              |              | It is the institution that should provide cooperation in the local employment dimension of the Project.<br>The organization should be included in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                                                                                                                              |
| Salihli Women's Cooperative                                                   | OIP              |              | Cooperative/Non-Governmental Organization (NGO) that may be interested in the Project should be included in consultation and information processes. They should be informed about job opportunities. They should be provided with information on ESMP and sub-management plans, SEP and GM.                                                                                                                                                                                   |
| Sektör Newspaper                                                              | OIP              |              | As a media organ, it may be interested in Project activities. They should be included in information and consultation processes.                                                                                                                                                                                                                                                                                                                                              |

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| <b>Stakeholders</b> | <b>PAP / OIP / DVIG</b> | <b>Relationship</b>                                                                    | <b>Interest / Concern</b> |
|---------------------|-------------------------|----------------------------------------------------------------------------------------|---------------------------|
|                     |                         | They should be provided with information on ESMP and sub-management plans, SEP and GM. |                           |

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### 3.3 Vulnerable/Disadvantaged People and Groups

Disadvantaged or Vulnerable Individuals or Groups (DVIG) include those who face barriers or difficulties in fully engaging with society or who are more susceptible to risks and vulnerabilities. These difficulties may arise from factors such as gender, economic status, social origin, age, disability or other conditions. Meeting their needs may require special assistance, support or protection measures to ensure their rights, well-being and access to equal opportunities.

The comprehensive methodology used to define the DVIG can be summarized as follows:

- Consideration of all interested or affected parties,
- Review all risks in the context of E&S, especially for vulnerable groups,
- Conducting stakeholder consultations prior to the project,
- Identify gaps, if any, between national and international standards,

As detailed in Methodology section, disadvantaged Project workers may be vulnerable to the Project due to noise, dust and exhaust gas emissions, traffic impacts, which are among the high risks of the Project identified for the construction period. These impacts will be seen at moderate and low levels during the operation period. In this sense, consultation with these vulnerable groups should be ensured to manage the high-risk impacts of the construction period.

The inclusion of disadvantaged Project workers is essential to manage the high risks identified for the construction period of the Project. It is imperative that these consultation meetings are completed prior to the start of the Project that they are introduced to the Project's contact information and grievance mechanism tools, and that they are provided with informative/orientation documents.

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#### 4 PREVIOUSLY CARRIED OUT CONSULTATION ACTIVITIES AND OUTCOMES

Within the scope of the Project, a meeting was held with the participation of representatives from ÇINAR and Vergo. The meeting was conducted on 09.02.2026 at the Project site located in the Salihli district of Manisa. The meeting was attended by a Social Specialist, an Occupational Health and Safety Specialist, and an Environmental Specialist from ÇINAR in its capacity as the Consultant, and by the Project Manager, Occupational Safety Manager, Senior Quality Engineer, and Senior Human Resources (HR) Specialist from Vergo.

Following the meeting, a site visit was carried out on the same date in order to observe the Project area and identify stakeholders.

Within the scope of introduction and information activities, a meeting was held with the OIZ representative. During this meeting, opinions and recommendations regarding the Project were obtained, and views were exchanged on its potential positive and negative environmental and social impacts.



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## 5 STAKEHOLDER ENGAGEMENT PROGRAMME AND DISCLOSURE PROCESS

In line with the findings and observations from the interviews, a Project-specific Stakeholder Engagement Plan (see Table 5-1) has been developed.

Sample Project Consultation Form and Sample Project Consultation Log recommended by TKYB may be used for consultations.



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**Table 5-1. Stakeholder Engagement Plan**

| Main Topic                                                         | Timing           | Identification of Stakeholders            | Method used                                                                                                                     | Location                                   | Frequency | Responsible Party                                                                                                                                                                                            |
|--------------------------------------------------------------------|------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identification of E&S and OHS risks and explanation of precautions | Pre-Construction | <b>PAP</b><br>Project workers             | Information meeting<br>Online meetings<br>Surveys and feedback forms                                                            | Project area                               | Monthly   | Vergo Project Management<br><br>Contractor / Subcontractor representatives<br><br>Vergo Environmental Specialist/Responsible<br><br>Vergo OHS Specialist<br><br>Işık Plastik Community Liaison Officer (CLO) |
| Identification of E&S and OHS risks and explanation of precautions | Pre-Construction | <b>PAP, OIP, DVIG</b>                     | Information meeting<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms | Project area                               | Quarterly | Vergo Project Management<br><br>Contractor / Subcontractor representatives<br><br>Vergo Environmental Specialist/Responsible<br><br>Vergo OHS Specialist<br><br>Vergo CLO                                    |
| Grievance mechanism                                                | Pre-Construction | <b>PAP, OIP, DVIG</b><br>All stakeholders | Announcement of the approved SEP on the website                                                                                 | Project area<br>Online platform<br>Website | Once      | Vergo Project Management                                                                                                                                                                                     |
| Grievance mechanism                                                | Pre-Construction | <b>PAP</b><br>Project workers             | Information meetings<br>Online meetings                                                                                         | Project area<br>Online platform            | Weekly    | Vergo Project Management                                                                                                                                                                                     |



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| Main Topic                                                         | Timing           | Identification of Stakeholders | Method used                                                                                                                     | Location                                   | Frequency   | Responsible Party                                                                                                                                         |
|--------------------------------------------------------------------|------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                    |                  |                                | Surveys and feedback forms                                                                                                      | Website                                    |             | Contractor / Subcontractor employee representatives                                                                                                       |
| Grievance mechanism                                                | Pre-Construction | PAP, OIP, DVIG                 | Orientation<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms         | Project area<br>Online platform<br>Website | Once        | Vergo Project Management<br>Contractor / Subcontractor employee representatives                                                                           |
| Discrimination and harassment<br>GBV, SEA/SH                       | Pre-Construction | PAP<br>Project workers         | Information meetings<br>Online meetings<br>Surveys and feedback forms                                                           | Project area<br>Online platform<br>Website | Quarterly   | Vergo Project Management<br>Contractor / Subcontractor employee representatives                                                                           |
| Identification of E&S and OHS risks and explanation of precautions | Construction     | PAP<br>Project workers         | Information meeting<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms | Project area                               | Quarterly   | Vergo Project Management<br>Contractor / Subcontractor representatives<br>Vergo Environmental Specialist/Responsible<br>Vergo OHS Specialist<br>Vergo CLO |
| Identification of E&S and OHS risks and explanation of precautions | Construction     | PAP, OIP, DVIG                 | Information meeting<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms | Project area                               | Semi-Annual | Vergo Project Management<br>Contractor / Subcontractor representatives                                                                                    |



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| Main Topic                                                         | Timing       | Identification of Stakeholders            | Method used                                                                                                                     | Location                                   | Frequency   | Responsible Party                                                                       |
|--------------------------------------------------------------------|--------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------|-----------------------------------------------------------------------------------------|
|                                                                    |              |                                           |                                                                                                                                 |                                            |             | Vergo Environmental Specialist/Responsible<br><br>Vergo OHS Specialist<br><br>Vergo CLO |
| Grievance mechanism                                                | Construction | <b>PAP, OIP, DVIG</b><br>All stakeholders | Announcement of revised SEP if necessary                                                                                        | Project area<br>Online platform<br>Website | Once        | Vergo Management Project                                                                |
| Grievance mechanism                                                | Construction | <b>PAP</b><br>Project workers             | Information meetings                                                                                                            | Project area<br>Online platform<br>Website | Monthly     | Vergo Management Project<br><br>Contractor / Subcontractor employee representatives     |
| Grievance mechanism                                                | Construction | <b>PAP, OIP, DVIG</b>                     | Orientation<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms         | Project area<br>Online platform<br>Website | Quarterly   | Vergo Management Project<br><br>Contractor / Subcontractor employee representatives     |
| Discrimination and harassment<br>GBV, SEA/SH                       | Construction | <b>PAP</b><br>Project workers             | Information meetings<br>Online meetings<br>Surveys and feedback forms                                                           | Project area<br>Online platform<br>Website | Semi-Annual | Vergo Management Project<br><br>Contractor / Subcontractor employee representatives     |
| Identification of E&S and OHS risks and explanation of precautions | Operation    | <b>PAP</b><br>Project workers             | Information meeting<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms | Project area                               | Annual      | Vergo Management Project<br><br>Contractor / Subcontractor representatives              |



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| Main Topic                                                         | Timing    | Identification of Stakeholders     | Method used                                                                                                                     | Location                                   | Frequency   | Responsible Party                                                                                                                                                                |
|--------------------------------------------------------------------|-----------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                    |           |                                    |                                                                                                                                 |                                            |             | Vergo Environmental Specialist/Responsible<br><br>Vergo OHS Specialist<br><br>Vergo CLO                                                                                          |
| Identification of E&S and OHS risks and explanation of precautions | Operation | PAP, OIP, DVIG                     | Information meeting<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms | Project area                               | Annual      | Işık Plastik Project Management<br><br>Contractor / Subcontractor representatives<br><br>Vergo Environmental Specialist/Responsible<br><br>Vergo OHS Specialist<br><br>Vergo CLO |
| Grievance mechanism                                                | Operation | PAP, OIP, DVIG<br>All stakeholders | Announcement of revised SEP if necessary                                                                                        | Project area<br>Online platform<br>Website | Once        | Vergo Project Management                                                                                                                                                         |
| Grievance mechanism                                                | Operation | PAP<br>Project workers             | Information meetings                                                                                                            | Project area<br>Online platform<br>Website | Semi-annual | Vergo Project Management<br><br>Contractor / Subcontractor employee representatives                                                                                              |
| Grievance mechanism                                                | Operation | PAP, OIP, DVIG                     | Orientation<br>Face-to-face public consultations<br>Online meetings<br>Open door meetings<br>Surveys and feedback forms         | Project area<br>Online platform<br>Website | Annual      | Vergo Project Management<br><br>Contractor / Subcontractor employee representatives                                                                                              |



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| Main Topic                                   | Timing    | Identification of Stakeholders | Method used                                                           | Location                                   | Frequency | Responsible Party                                                               |
|----------------------------------------------|-----------|--------------------------------|-----------------------------------------------------------------------|--------------------------------------------|-----------|---------------------------------------------------------------------------------|
| Discrimination and harassment<br>GBV, SEA/SH | Operation | <b>PAP</b><br>Project workers  | Information meetings<br>Online meetings<br>Surveys and feedback forms | Project area<br>Online platform<br>Website | Annual    | Vergo Project Management<br>Contractor / Subcontractor employee representatives |



|                                    |               |                              |
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## 6 PROJECT GRIEVANCE MECHANISM

### 6.1 Overview

The contact information of Vergo Enerji Sistemleri Sanayi ve Ticaret A.Ş. head office is given below:

Address : Salihli OSB Mahallesi, 307. Sokak, No: 13, Salihli/MANİSA  
Phone : +90 232 880 70 80  
E-Mail : [info@vergo.com.tr](mailto:info@vergo.com.tr)  
Website : <https://www.vergo.com.tr/>

Internal and external stakeholders (including foreigners) can also apply to the following national-level GMs:

**Presidential Communication Center (CİMER)** provides a centralized grievance system for Turkish citizens, legal entities and foreigners. CİMER will serve as an alternative and well-known channel through which Project stakeholders can submit Project-related complaints and feedback directly to government authorities. In addition, under the Right to Information Law, every individual has the right to access information in accordance with the procedures and principles set out in the written regulations. This can be realized through the Right to Petition or by submitting a written request online at (<https://www.icisleri.gov.tr/bilgi-edinme>). Contact information for CİMER is provided below:

- Website: [www.cimer.gov.tr](http://www.cimer.gov.tr)
- Call Center: 150
- Telephone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to the Communications Directorate of the Republic of Türkiye
- Individual applications to public relations desks in governorships, ministries and district governorships.

**Foreigners Communication Center (YİMER)** provides a centralized grievance system for foreigners. YİMER will serve as an alternative and well-known channel for Project stakeholders to submit Project-related complaints and feedback directly to government authorities. Contact information for YİMER is provided below:

- Website: [www.yimer.gov.tr](http://www.yimer.gov.tr)
- Call Center: 157
- Telephone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to the Communications Directorate of the Republic of Türkiye
- Individual application to the Directorate General of Migration Management of the Republic of Türkiye



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## 6.2 Principles of the Grievance Mechanism

The main purpose of the grievance mechanism is to help resolve grievances and requests in a timely, effective and efficient manner to the satisfaction of all parties involved. The GM (and also the WGM) will be effective throughout the life of the project. This mechanism is intended to serve the following:

- Allowing issues affecting the project to be identified and resolved in an impartial, timely and effective manner,
- Strengthening accountability of beneficiaries, including project-affected stakeholders,
- Providing channels for stakeholders to provide feedback and raise concerns,
- Providing an open, transparent, culturally sensitive and easily accessible consultation process,
- Providing the option for anonymous complaints and feedback, particularly in cases of Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH),

Recognize that complaints about public health, safety and environmental risks can be urgent, particularly in cases of accidents, infectious diseases and pollution. Urgent measures will be taken to identify and prevent further damage.

## 6.3 External Grievance Mechanism

All stakeholders can submit individual applications to the GM established specifically for the Project in the ways provided.

To implement the GM, Vergo and the contractor's CLO will actively follow the grievances made by stakeholders. They will collaborate with relevant units to resolve these issues and register grievances with the GM.

Forms to be created by Vergo in the form of Request, Grievance and Suggestion forms.

It will be summarized in the explanation section categorized here. Signature and personal information will be requested upon request (See Sample Project Grievance Register Form).

Feedback received through the registration form will be classified and archived using the grievance log (See Sample Project Grievance Log).

Closure forms are the last stage of these logs. Notes for corrective actions will be created here (See Sample Project Grievance Closure Form).

## 6.4 Internal Grievance Mechanism

There is a Code of Conduct document established by the project management and this document is binding for all project employees, including contractor/subcontractor.

Grievance and suggestion boxes will be located within the Project area.

Project employees will use the WGM to raise concerns or suggestions regarding working conditions and the workplace. WGM is defined as the mechanism to receive grievances from Project workers (including both direct and indirect workers).

Workers will be informed about the possibility of submitting project-related grievances on GBV and SEA/SH issues anonymously. Grievance-handling authorities should ensure the confidentiality of the aggrieved party and apply an impartial approach when handling such matters.



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Grievances about GBV and SEA/SH should be segregated and reported to relevant institutions. Confidentiality and ethical filing of GBV and SEA/SH grievances should be observed to protect the victim, prevent disclosure of shared information and avoid creating new challenges.

## 6.5 Grievance Mechanism Channels and CLO Contact Details

A customized website and communication network will be defined for Capacity Increase and Galvanizing Facility Investment in Addition to the Existing Facility in Manisa Salihli Organized Zone Project to be constructed by Vergo Enerji Sistemleri Sanayi ve Ticaret A.Ş. Open and transparent contact addresses will be announced on the website given above.

The company will appoint a CLO to work in the region.

Contact information of the appointed CLO will also be announced on this page.



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## 7 RESOURCES AND ROLES&RESPONSIBILITIES

Expenses or costs incurred in carrying out SEP-related activities will be financed or paid using the budget provided by Vergo.

The funds needed to cover these costs will come from the budgets allocated by Vergo for this purpose.

Information and disclosure methods include printed and online information documents and consultations. These may include the following:

- Promotional documents produced in the form of brochures, posters, flyers, etc. containing up-to-date information about the project, contractor and facility and containing short informative notes
- Vergo's official website where relevant documents are available online
- Current announcements on Vergo's official website
- Notice boards with warnings and information notes on occupational and environmental health, safety and security as well as waste management will be placed in and around the facility
- Request, complaint and suggestion boxes to be placed in and around the facility
- Regular consultation meetings with local and regional institutions and organizations

The Project Owner will provide information about the Project to all Project-affected parties, in particular affected settlements, local residents, local government agencies and their workforce, and will be involved in the identification of key Project issues. For stakeholder engagement activities, the main administrative responsibilities and responsibilities for relevant stakeholders are summarized below with Table 7-1.

**Table 7-1. Roles and Responsibilities**

| <b>Responsible Organization</b>  | <b>Roles and Responsibilities</b>                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Vergo Project Management</b>  | Planning and implementation of SEP activities<br>Announcement of SEP related activities<br>Reporting of SEP related activities<br>Proper implementation of the grievance mechanism defined in the SEP and follow-up on the overall implementation status                                                                                                                                                                   |
| <b>CLO</b>                       | Planning and implementation of SEP activities in close cooperation with Işık Plastik Project Management<br>Publicizing SEP-related activities<br>Reporting of SEP related activities<br>Proper implementation of the grievance mechanism defined in the SEP and follow-up on the overall implementation status                                                                                                             |
| <b>Environmental Specialist</b>  | Participant information process<br>Participatory solution process                                                                                                                                                                                                                                                                                                                                                          |
| <b>OHS Specialist</b>            | Participant information process<br>Participatory solution process                                                                                                                                                                                                                                                                                                                                                          |
| <b>Monitoring and Evaluation</b> | Monitoring the logging and resolution of grievances and reporting to Işık Plastik Project Management<br>Reporting to Vergo Project Management on the implementation of SEP activities                                                                                                                                                                                                                                      |
| <b>Contractor</b>                | Informing Vergo Project Management on any issues related to their interactions with stakeholders.<br>Informing Vergo Project Management for environmental and social issues (e.g. noise, dust, traffic, community health and safety, etc.)<br>Develop and implement a GM for both the project's E&S performance and for employees, including subcontractors, prior to the start of work in accordance with GM requirements |

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## 8 MONITORING AND REPORTING

SEP Monitoring Reports will be prepared monthly by the Contractor and submitted to Vergo Management.

The project proponent also commits to maintain transparent lines of communication with relevant stakeholders as the situation requires. Newly identified stakeholders will be added to the stakeholder list with immediate initiation of communication. In the event of significant changes or updates to the project, the project proponent will continue to communicate and disseminate information on environmental and social concerns to relevant stakeholders. Improvements, updates and notifications on environmental and social issues will be communicated promptly in accordance with the procedures set out in this SEP.

The SEP will be subject to periodic revisions, especially if significant changes occur in the project. These revisions will provide brief summaries of concerns, issues and questions raised in the previous year, together with details on deviations from originally planned activities or events.

The SEP will be updated regularly as required throughout the project duration. The worker responsible for it will compile periodic reports on stakeholder complaints and inquiries, including the status of corrective actions. These quarterly reports will help assess the number and types of issues and the Project's ability to address them effectively. Information on the Project's public participation activities may be shared with stakeholders through various communication channels as needed.

Table 8-1 has been prepared to provide a comprehensive overview of GM monitoring and reporting processes. The table defines Key Performance Indicators (KPIs) and identifies the responsible parties assigned with this task.



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**Table 8-1. Monitoring Plan**

| KPIs   |                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Requirements                                                                                                                                                   | Items Used for Monitoring                                                                                                                                                | Project Phase and Frequency    |                  | Responsible Parts for Monitoring | Items used for reporting                                                                                                                                                                                                       | Project Phase and Frequency |                  | Responsible Parts for Reporting |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------|---------------------------------|
| KPI-01 | Recording all written and verbal feedback<br>Records will also include anonymous complaints<br>The registers will show the number of both open and closed complaints.<br>Recording the actions taken for closed complaints.<br>Record minutes of meetings (MoM) and training (date, topic, number of participants)<br>Photographs (if permissions are obtained)<br>Complaint Records<br>Assessment of the social appropriateness of project implementations | Establishment of a project-specific GM<br>Establishment of a Project Specific Worker GM<br>Preparation of complaint forms<br>Evaluation of employee GM records | Routine field visits<br>Random face-to-face interviews with stakeholders<br>Focus group discussion with vulnerable groups<br>Remote consultations with vulnerable groups | Once before project activities | Pre-Construction | Vergo Management                 | Distribution of records according to feedback types such as concerns, complaints, questions and suggestions.<br>Number of complaints closed<br>Number of open and ongoing complaints<br>List of actions to close the complaint | No term                     | Pre-Construction | Contractor CLO                  |



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| KPIs   |                                                                                             | Requirements                                                                                                                                                                                                                                                                                                    | Items Used for Monitoring                                                                                                                                                | Project Phase and Frequency |              | Responsible Parts for Monitoring | Items used for reporting                                                                                                                        | Project Phase and Frequency |              | Responsible Parts for Reporting |
|--------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------------|---------------------------------|
| KPI-02 | Appointment of CLO<br>Forwarding complaints to relevant units                               | Ensuring appropriate staffing for stakeholder engagement, including vulnerable groups                                                                                                                                                                                                                           | Regular meetings with CLO                                                                                                                                                | Weekly                      | Construction | Vergo Management                 | Monthly, quarterly and semi-annual reports of CLO<br>Documentation of consultation, including litigation, if any                                | Semi-Annual                 | Construction | Contractor CLO                  |
|        |                                                                                             |                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                          | Monthly                     | Operation    |                                  |                                                                                                                                                 | Annual                      | Operation    |                                 |
| KPI-03 | Recording all written and verbal feedback<br>The records also include anonymous complaints. | Creation of all types of accessible communication tools<br>Consideration of language-based barriers for all types of communication techniques<br>Provision of a living document form used in the information process<br>Establishing an on-site public relations office<br>Conducting stakeholder consultations | Routine field visits<br>Random face-to-face interviews with stakeholders<br>Focus group discussion with vulnerable groups<br>Remote consultations with vulnerable groups | Weekly                      | Construction | Vergo Management                 | Distribution of registrations by stakeholder types, including vulnerable groups<br>Breakdown of records by additional language use, if required | Semi-Annual                 | Construction | Contractor CLO                  |
|        |                                                                                             |                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                          | Monthly                     | Operation    |                                  |                                                                                                                                                 | Annual                      | Operation    |                                 |



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| KPIs   |                                                      | Requirements                                     | Items Used for Monitoring | Project Phase and Frequency |                           | Responsible Parts for Monitoring | Items used for reporting                                                                                                                                                                                                                                                                                                                                                    | Project Phase and Frequency |                           | Responsible Parts for Reporting |
|--------|------------------------------------------------------|--------------------------------------------------|---------------------------|-----------------------------|---------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------------------|---------------------------------|
| KPI-04 | Monitoring the contractor's activities related to GM | Ensure monitoring of the contractor's activities | Regular meetings with CLO | Quarterly<br>Semi-Annual    | Construction<br>Operation | Vergo Management                 | Records prepared by the Contractor's representative during the GM process<br>Number of closed grievances registered by the contractor<br>Number of open and ongoing grievances logged by the contractor<br>List of actions implemented by the Contractor to close the registered complaint<br>Quarterly, semi-annual and annual reports of the contractor's representative. | Quarterly<br>Semi-Annual    | Construction<br>Operation | Contractor CLO                  |



|                                    |               |                              |
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## 9 APPENDICES

### 9.1 Sample Project Consultation Form

| CONSULTATION FORM                                   |                                       |                                          |                                        |                                                      |
|-----------------------------------------------------|---------------------------------------|------------------------------------------|----------------------------------------|------------------------------------------------------|
| Person Filling Out the Form                         |                                       |                                          | Date                                   |                                                      |
| Meeting Agenda                                      |                                       |                                          | Consultation Register Number           |                                                      |
| <b>1- Meeting Information</b>                       |                                       |                                          |                                        |                                                      |
| Name of Authorized Person                           |                                       |                                          |                                        | Type of Communication                                |
| Institution Consulted                               |                                       |                                          |                                        | <input type="checkbox"/> Face-to-Face                |
| Phone/Email                                         |                                       |                                          |                                        | <input type="checkbox"/> Phone                       |
| Village/District/Province                           |                                       |                                          |                                        | <input type="checkbox"/> Other                       |
| <b>Type of Stakeholder</b>                          |                                       |                                          |                                        |                                                      |
| <input type="checkbox"/> Public Institution         | <input type="checkbox"/> PAP          | <input type="checkbox"/> Association/NGO | <input type="checkbox"/> Related Group | <input type="checkbox"/> Chamber / Professional Body |
| <input type="checkbox"/> Contractor / Subcontractor | <input type="checkbox"/> Labour Union | <input type="checkbox"/> Media           | <input type="checkbox"/> University    | <input type="checkbox"/> Other                       |
| <b>2- Details of the Consultation</b>               |                                       |                                          |                                        |                                                      |
| Subject                                             |                                       |                                          |                                        |                                                      |
| Feedback                                            |                                       |                                          |                                        |                                                      |
| Note                                                |                                       |                                          |                                        |                                                      |

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## 9.2 Sample Project Consultation Log

| Stakeholder Type | Institution Consulted | Stakeholder | Gender | Phone | Communication Channel | Date | Agenda Of the Meeting | Number Of Stakeholders Engaged | Team | Person Filling Out the Form | Details of the Consultation |
|------------------|-----------------------|-------------|--------|-------|-----------------------|------|-----------------------|--------------------------------|------|-----------------------------|-----------------------------|
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |
|                  |                       |             |        |       |                       |      |                       |                                |      |                             |                             |



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### 9.3 Sample Project Grievance Register Form

|                                                                                                                                                |                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <b>Full Name</b>                                                                                                                               |                                                 |
| <b>Contact Information</b>                                                                                                                     | <b>By Post: Please provide mailing address.</b> |
| <b>Please identify how you wish to be contacted (mail, telephone, e-mail)</b>                                                                  | <b>By telephone:</b>                            |
|                                                                                                                                                | <b>By e-mail:</b>                               |
| <b>Preferred language of communication?</b>                                                                                                    | Turkish ..... Other.....                        |
| <b>Description of incident or grievance</b><br>(What happened? Where did it happen? Who did it happen to? What is the result of the problem?): |                                                 |
|                                                                                                                                                |                                                 |
| <b>Date of incident/grievance</b>                                                                                                              |                                                 |
|                                                                                                                                                | One time incident/grievance (date _____)        |
|                                                                                                                                                | Happened more than once (how many times? _____) |
|                                                                                                                                                | On-going (currently experiencing problem)       |
| <b>What would you like to see to resolve this problem?</b>                                                                                     |                                                 |
|                                                                                                                                                |                                                 |
| <b>Internal Use Only</b>                                                                                                                       |                                                 |
| <b>Grievance received by:</b>                                                                                                                  |                                                 |
| <b>Date:</b>                                                                                                                                   |                                                 |
| <b>Reference number:</b>                                                                                                                       |                                                 |



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#### 9.4 Sample Project Grievance Log

| No | Date received | Name/<br>Anonymous | Type of<br>grievance | Classification | Brief description | Person<br>responsible<br>for follow-up | Actions taken | Date resolved | Action taken<br>to avoid<br>future similar<br>grievances |
|----|---------------|--------------------|----------------------|----------------|-------------------|----------------------------------------|---------------|---------------|----------------------------------------------------------|
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |
|    |               |                    |                      |                |                   |                                        |               |               |                                                          |



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## 9.5 Sample Project Grievance Closure Form

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                          |                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------|
| Name of the Recorder:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                          |                   |
| Date of Register:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                          | ...../...../..... |
| <b>GRIEVANCE/REQUEST CLOSURE</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                          |                   |
| <p>In this section of the Closing Form, information on how the grievance was resolved or how the request was met will be included; if there is an expenditure made, its information will be entered; an explanation that the grievance/request is agreed with the grievance/request owner will be written and signed by grievance or request owner and the relevant Client employee and closed.</p> <p>(For grievances received over the Internet, an e-mail response will be expected instead of a signature)</p> |                                                          |                   |
| <b>Actions Taken for Grievance/Request</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Relevant Departments /Contractors/ Subcontractors</b> |                   |
| 1-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                          |                   |
| 2-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                          |                   |
| 3-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                          |                   |
| 4-                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                          |                   |
| <b>Amount of Expenditure:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                          |                   |
| Grievance/Requestor<br>Name and Surname                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | On behalf of Client<br>Title-Name-Surname and Signature  |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                          |                   |

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## 9.6 National and International Requirements

### 9.6.1 Constitution of the Republic of Türkiye

| Article           | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Preamble</b>   | That every Turkish citizen has an innate right and power, to lead an honorable life and to improve his/her material and spiritual wellbeing under the aegis of national culture, civilization, and the rule of law, through the exercise of the fundamental rights and freedoms set forth in this Constitution, in conformity with the requirements of equality and social justice.                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Protecting the principle of equality and social justice in stakeholder engagement.</li> </ul>                                                                                                                                                                                                                                                                                                                |
| <b>Article 10</b> | Everyone is equal before the law without distinction as to language, race, color, sex, political opinion, philosophical belief, religion and sect, or any such grounds<br>No privilege shall be granted to any individual, family, group or class.                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Acting against all forms of discrimination in stakeholder engagement.</li> </ul>                                                                                                                                                                                                                                                                                                                             |
| <b>Article 12</b> | Everyone possesses inherent fundamental rights and freedoms, which are inviolable and inalienable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Protection of personal rights in stakeholder relations.</li> </ul>                                                                                                                                                                                                                                                                                                                                           |
| <b>Article 17</b> | Everyone has the right to life and the right to protect and improve his/her corporeal and spiritual existence.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>Protection of personal rights in stakeholder relations.</li> </ul>                                                                                                                                                                                                                                                                                                                                           |
| <b>Article 20</b> | Everyone has the right to demand respect for his/her private and family life. Privacy of private or family life shall not be violated. Everyone has the right to request the protection of his/her personal data. This right includes being informed of, having access to and requesting the correction and deletion of his/her personal data, and to be informed whether these are used in consistency with envisaged objectives. Personal data can be processed only in cases envisaged by law or by the person's explicit consent. The principles and procedures regarding the protection of personal data shall be laid down in law. | <ul style="list-style-type: none"> <li>Protection of personal data obtained in stakeholder relations, keeping it confidential and using it anonymized only when necessary.</li> <li>Requesting information in stakeholder relations only with the consent of the person and organization.</li> <li>Obtaining confidential recordings/photographs without the consent of the person and/or organization and preventing their publication.</li> </ul> |
| <b>Article 22</b> | Everyone has the freedom of communication. Privacy of communication is fundamental.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project.</li> <li>Keeping confidential the contact information to which requests, suggestions, complaints and questions from stakeholders are forwarded.</li> </ul>                                                                                                           |
| <b>Article 24</b> | Everyone has the freedom of conscience, religious belief and conviction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>Preventing any discrimination against stakeholders while expressing themselves and giving equal and fair chances to all stakeholders.</li> </ul>                                                                                                                                                                                                                                                             |

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| Article           | Requirements                                                                                                                                                               | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Article 25</b> | Everyone has the freedom of thought and opinion.                                                                                                                           | <ul style="list-style-type: none"> <li>Preventing any discrimination against stakeholders while expressing themselves and giving equal and fair chances to all stakeholders.</li> </ul>                                                                                                                                                                                                                                                    |
| <b>Article 26</b> | Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. | <ul style="list-style-type: none"> <li>Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression.</li> </ul>                                                                                                                                                                                |
| <b>Article 27</b> | Everyone has the right to study and teach, express, and disseminate science and the arts, and to carry out research in these fields freely.                                | <ul style="list-style-type: none"> <li>In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project.</li> </ul>                                                                                                                                                                                                                                                  |
| <b>Article 40</b> | Everyone whose constitutional rights and freedoms have been violated has the right to request prompt access to the competent authorities.                                  | <ul style="list-style-type: none"> <li>Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities.</li> <li>Reminding that in case of complaints, especially from internal stakeholders, remedies to legal authorities other than the internal GM are open.</li> </ul>                                                          |
| <b>Article 48</b> | Everyone has the freedom to work and conclude contracts in the field of his/her choice.                                                                                    | <ul style="list-style-type: none"> <li>Ensuring equal information opportunities when announcing employment opportunities</li> <li>Consultations with stakeholders on equal opportunities and non-discrimination in employment</li> <li>Informing all internal stakeholders about contract and labor rights.</li> </ul>                                                                                                                     |
| <b>Article 50</b> | No one shall be required to perform work unsuited to his/her age, sex, and capacity.                                                                                       | <ul style="list-style-type: none"> <li>Conduct internal GM including subcontractors and subcontractors to prevent forced labor, child labor and modern slavery.</li> <li>Informing stakeholders about the concepts of forced labor, child labor and modern slavery</li> <li>Informing all Project employees (all internal stakeholders), including subcontractors and subcontractors, about their contractual and labor rights.</li> </ul> |



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| Article           | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                          | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Article 51</b> | Employees and employers have the right to form unions and higher organizations, without prior permission, and they also possess the right to become a member of a union and to freely withdraw from membership, in order to safeguard and develop their economic and social rights and the interests of their members in their labour relations. No one shall be forced to become a member of a union or to withdraw from membership. | <ul style="list-style-type: none"> <li>Informing all internal stakeholders about the contract and labor and union rights.</li> <li>Conducting internal GM to ensure that barriers restricting contract and trade union rights are eliminated.</li> </ul>                                                                                                                                                                                          |
| <b>Article 53</b> | Workers and employers have the right to conclude collective labour agreements in order to regulate reciprocally their economic and social position and conditions of work.                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Informing both employers and employees about their rights</li> <li>Conducting internal GM to protect both employers and employees</li> </ul>                                                                                                                                                                                                                                                               |
| <b>Article 55</b> | Wages shall be paid in return for work. The state shall take the necessary measures to ensure that workers earn a fair wage commensurate with the work they perform and that they enjoy other social benefits.                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Conduct internal GM including subcontractors and subcontractors to prevent forced labor and modern slavery</li> <li>Ensuring equal work and working conditions in a way that does not allow discrimination among employees</li> <li>Informing subcontractors and subcontractors about working hours, wages, overtime, compensation and social rights to prevent forced labor and modern slavery</li> </ul> |
| <b>Article 56</b> | Everyone has the right to live in a healthy and balanced environment.                                                                                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>Ensuring equal work and working conditions in a way that does not allow discrimination among employees</li> <li>Informing subcontractors and subcontractors about working hours, wages, overtime, compensation and social rights to prevent forced labor and modern slavery</li> </ul>                                                                                                                     |
| <b>Article 60</b> | Everyone has the right to social security.                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Ensuring equal work and working conditions in a way that does not allow discrimination among employees</li> <li>Informing both employers and employees about their rights</li> </ul>                                                                                                                                                                                                                       |
| <b>Article 74</b> | Citizens and foreigners resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public.                                                                                                                              | <ul style="list-style-type: none"> <li>Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression</li> </ul>                                                                                                                                                                                        |

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| Article                                                                       | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Article 148</b>                                                            | Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities.                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities.</li> <li>Reminding that in case of complaints, especially from internal stakeholders, remedies to legal authorities other than the internal GM are open</li> </ul> |
| <b>Right to Information Act</b>                                               | Article 11 – The institutions shall provide the required information within 15 working days. However, where the required information or document is to be obtained from another unit within the applied institution or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In such case, the applicant will be notified of the extension and its reasons within 15 working days.                                                                                                                                                               | <ul style="list-style-type: none"> <li>The stakeholder engagement plan is prepared to directly inform stakeholders.</li> </ul>                                                                                                                                                                                                                                                   |
| <b>Right of Petition, Right to Information and Appeal to the Ombudsperson</b> | Citizens have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to requests and complaints concerning themselves or the public. The result of the application concerning himself shall be made known to the petitioner in writing.                                                                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities.</li> </ul>                                                                                                                                                         |
| <b>Personal Data Protection Law</b>                                           | The Law on the Protection of Personal Data in Türkiye, also known as KVKK, regulates the processing of personal data to protect the privacy of individuals. The Law defines the roles of data controllers and data processors, requires consent for data processing and mandates purpose limitation. The Law grants individuals' rights over their data and imposes obligations for data security. It regulates international data transfers and requires notification of data breaches. An independent Data Protection Authority monitors and enforces compliance with the law. It is recommended to consult the most up-to-date legal sources for the most up-to-date details. | <ul style="list-style-type: none"> <li>Stakeholders will have the right to present themselves anonymously.</li> <li>Personal data of any stakeholder involved in the process.</li> </ul>                                                                                                                                                                                         |

### 9.6.2 TKYB Requirements

| No | Principles                                                                          | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                               |
|----|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Considering the direct and indirect environmental and social impacts that may arise | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> <li>Informing stakeholders in case of possible pollution</li> <li>Consultations with stakeholders on reducing risks and increasing positive</li> </ul> |

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| No | Principles                                                                                                                                    | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                                                                                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                               | activities in disclosure processes                                                                                                                                                                                                                                                                                                                                                   |
| 2  | Environmental and social risk assessment should be part of routine decision-making in all investment and lending practices                    | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> <li>Informing stakeholders in case of possible pollution</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul>                    |
| 3  | Regularly monitor negative environmental and social impacts and minimize them while increasing positive environmental and social activities   | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> <li>Informing stakeholders in case of possible pollution</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul>                    |
| 4  | Support capacity building as a sustainability requirement                                                                                     | <ul style="list-style-type: none"> <li>Involving all stakeholders during construction and operation</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul>                                                                                                                                                 |
| 5  | Seeing cooperation with all stakeholders as essential for sustainable success and developing opportunities for cooperation                    | <ul style="list-style-type: none"> <li>In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project</li> <li>Involving all stakeholders during construction and operation</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul> |
| 6  | Regularly measure and monitor greenhouse gas emissions and resource consumption and set targets to improve resource and energy efficiency     | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> </ul>                                                                                                                                                                                                        |
| 7  | Commitment to the United Nation Sustainable Development Goals                                                                                 | <ul style="list-style-type: none"> <li>Involving all stakeholders during construction and operation</li> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> </ul>                                                                                                                                  |
| 8  | Embracing the fight against climate change and sharing it with stakeholders through the Combating Climate Change Adaptation Policy            | <ul style="list-style-type: none"> <li>Involving all stakeholders during construction and operation</li> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> </ul>                                                                                                                                  |
| 9  | Providing a working environment that respects human rights and ensures justice, equality and trust, and raising awareness among its customers | <ul style="list-style-type: none"> <li>Protecting the principle of equality and social justice in stakeholder engagement</li> <li>Acting against all forms of discrimination in stakeholder engagement</li> <li>Preventing any discrimination against stakeholders while expressing</li> </ul>                                                                                       |

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| No | Principles                                                                                                                                               | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                          | <p>themselves and giving equal and fair chances to all stakeholders</p> <ul style="list-style-type: none"> <li>• Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression</li> <li>• Organizing special meetings for women, poor and disabled people and developing different information methods for these vulnerable groups</li> <li>• Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions</li> <li>• Including all internal stakeholders in the information, training and participation processes during the construction period and operation period</li> <li>• Informing all stakeholders about and providing access to the GM during the construction period and operation period.</li> </ul>                                                                                           |
| 10 | Providing fair and equal opportunities within the scope of Human Resources Regulation                                                                    | <ul style="list-style-type: none"> <li>• Informing internal stakeholders about occupational health and safety</li> <li>• Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions</li> <li>• Including all internal stakeholders in the information, training and participation processes during the construction period and operation period</li> <li>• Establishing employee codes of conduct and raising awareness on this issue</li> <li>• Informing all internal stakeholders about the prevention of forced labor and child labor during construction and operation period</li> <li>• Informing all internal stakeholders about the principles of freedom of association and collective bargaining during the construction and operation period and providing an appropriate environment</li> <li>• Informing all internal stakeholders about and providing access to the GM during the construction period and operation period.</li> </ul> |
| 11 | Adopting a zero-tolerance policy against bribery and corruption and acting within the framework of the Anti-Bribery and Anti-Corruption Policy           | <ul style="list-style-type: none"> <li>• Implementation of an open and transparent management system</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 12 | Providing a healthy and safe working environment for staff within the scope of legal legislation and practices related to occupational health and safety | <ul style="list-style-type: none"> <li>• Informing internal stakeholders about occupational health and safety</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 13 | To follow a fair and transparent communication policy in communication activities                                                                        | <ul style="list-style-type: none"> <li>• Involving all stakeholders during construction and operation</li> <li>• Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions</li> <li>• Organizing special meetings for women, poor and disabled people and developing different information methods for these vulnerable groups</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| No | Principles                                                                                                                                                                                                                                                       | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                                                                                                  |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Including all internal stakeholders in the information, training and participation processes during the construction period and operation period</li> </ul>                                                                                                                                                                                                |
| 14 | Communicate timely and accurate information to its stakeholders through the right channels and establish communication channels (written, visual and social media) to receive feedback from its main stakeholders and understand their priorities and needs      | <ul style="list-style-type: none"> <li>The Project's stakeholders and their level of interest and support are defined in the Scope section.</li> <li>Stakeholders are informed about environmental and social risks in a timely manner</li> <li>Consultations with stakeholders to mitigate risks and increase positive activities in disclosure processes are defined under this SEP.</li> </ul> |
| 15 | Adopt an effective governance model to develop, implement, manage and monitor sustainability activities and support the implementation and continuous improvement of corporate sustainability management at the level of international sustainability standards. | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul>                                                                                               |

### 9.6.3 International Requirements

| No          | PS / ESS                                                                | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PS1<br>ESS1 | Assessment and Management of Environmental and Social Risks and Impacts | <ul style="list-style-type: none"> <li>Identify, assess and manage the environmental and social risks and impacts of the project</li> <li>Take differentiated measures for disadvantaged or vulnerable groups and include them in opportunities</li> <li>Use national level environmental and social regulations and procedures where appropriate</li> </ul>                                                                                                                  | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods</li> <li>Organizing special meetings for women, poor and disabled people and developing different information methods for these vulnerable groups</li> <li>Fulfillment of the requirements stated in the current EIA Regulation, especially Article 9 under the title of "Public information and public participation meeting"</li> </ul> |
| PS2         | Labor and Working Conditions                                            | <ul style="list-style-type: none"> <li>Promoting safety and health at work</li> <li>Promote fair treatment, freedom and equal opportunity among project employees</li> <li>Protecting vulnerable, disadvantaged and vulnerable (women, persons with disabilities, etc.) project workers, including migrant workers, contract workers, community workers and primary supply chain workers</li> <li>To prevent the use of all forms of forced labor and child labor.</li> </ul> | <ul style="list-style-type: none"> <li>Informing internal stakeholders about occupational health and safety</li> <li>Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions</li> <li>Establishing employee codes of conduct and raising awareness on this issue</li> <li>Including all internal stakeholders in the information, training and participation processes during the</li> </ul>                                                            |

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| No  | PS / ESS                                     | Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                              | <ul style="list-style-type: none"> <li>Promote the principles of freedom of association and collective bargaining for project workers in accordance with national law</li> <li>Providing project workers with accessible tools to raise workplace concerns</li> </ul>                                                                                                                                                                                                                                                                                | <p>construction period and operation period</p> <ul style="list-style-type: none"> <li>Informing and raising awareness of all internal stakeholders about the prevention of forced labor and child labor during construction and operation period</li> <li>Informing and raising awareness of all internal stakeholders about harassment and discrimination in the workplace during construction and operation</li> <li>Informing and raising awareness among all internal stakeholders about gender-based discrimination and harassment in the workplace during construction and operation</li> <li>Informing all internal stakeholders about the principles of freedom of association and collective bargaining during the construction period and operation period and providing an appropriate environment</li> <li>Informing all internal stakeholders about and providing access to the GM during the construction period and operation period.</li> </ul> |
| PS3 | Resource Efficiency and Pollution Prevention | <ul style="list-style-type: none"> <li>Promote the sustainable use of resources, including energy, water and raw materials</li> <li>To prevent or minimize adverse impacts on human health and the environment by preventing or minimizing pollution from project activities</li> <li>Avoid or minimize project-related emissions of short- and long-lived climate pollutants</li> <li>Prevent or minimize the generation of hazardous and non-hazardous waste to minimize and manage the risks and impacts associated with pesticide use</li> </ul> | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> <li>Informing stakeholders in case of possible pollution</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| PS4 | Community Health and Safety                  | <ul style="list-style-type: none"> <li>Anticipate and prevent adverse impacts on the health and safety of project-affected communities throughout the project life cycle</li> <li>Promote quality and safety and climate change considerations in the design and construction of infrastructure</li> <li>Prevent or minimize community exposure to project-related traffic and road safety risks, diseases and</li> </ul>                                                                                                                            | <ul style="list-style-type: none"> <li>Stakeholders are informed about environmental and social risks in a timely manner</li> <li>Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| No                        | PS / ESS                                                                                       | Requirements                                                                                                                                                                                                                                                                                                                                                                                                     | Stakeholder Engagement Aspect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           |                                                                                                | <ul style="list-style-type: none"> <li>hazardous substances</li> <li>Taking effective measures to address emergency incidents</li> <li>Ensure that protection of personnel and property is carried out in a manner that avoids or minimizes risks to project-affected communities</li> </ul>                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>PS5</b><br><b>ESS2</b> | Land Acquisition, Restrictions on Land Use and Involuntary Resettlement                        | <ul style="list-style-type: none"> <li>Preventing forced resettlement and, in case of necessity, minimizing forced resettlement by evaluating Project design alternatives.</li> </ul>                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>There will be no land use outside the area determined within the scope of the Project.</li> <li>Economic and physical resettlement will not be implemented under the Project.</li> <li>If the Project falls within the scope of Land Use Restrictions and Mandatory Resettlement, the SEP will need to be revised in accordance with PS5.</li> </ul>                                                                                                                                                  |
| <b>PS6</b>                | Biodiversity Conservation and Sustainable Management of Living Natural Resources               | <ul style="list-style-type: none"> <li>Apply the mitigation hierarchy and precautionary approach in the design and implementation of projects that may have an impact on biodiversity</li> </ul>                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>There will be no land use outside the boundaries of the area determined within the scope of the Project.</li> <li>Within the scope of the Project, there are no studies conducted to identify biodiversity, living and natural resources. In the event that areas that comply with the requirements stated in PS6 are identified through specific surveys, institutional opinions, literature reviews or remote sensing methods, the SEP will need to be revised in accordance with PS6.</li> </ul>   |
| <b>PS7</b><br><b>ESS3</b> | Indigenous Peoples / Sub-Saharan Africa Historically Underserved Traditional Local Communities | <ul style="list-style-type: none"> <li>Ensure that the development process promotes full respect for the human rights, dignity, identity, culture and natural resource-based livelihoods of Indigenous Peoples / Historically Under-Served Traditional Local Communities of Sub-Saharan Africa.</li> </ul>                                                                                                       | <ul style="list-style-type: none"> <li>This standard is out of scope for projects implemented in Türkiye as no communities with indigenous characteristics as defined under PS7 are located within the borders of the country.</li> </ul>                                                                                                                                                                                                                                                                                                    |
| <b>PS8</b>                | Cultural Heritage                                                                              | <ul style="list-style-type: none"> <li>Protect cultural heritage from the negative impacts of project activities and support its conservation</li> <li>Addressing cultural heritage as an integral part of sustainable development</li> <li>Promote meaningful consultations with cultural heritage stakeholders</li> <li>Promote the equitable sharing of benefits from the use of cultural heritage</li> </ul> | <ul style="list-style-type: none"> <li>There will be no land use outside the boundaries of the area determined within the scope of the Project.</li> <li>Within the scope of the Project, no studies have been conducted to identify the existence of movable or immovable (tangible) and/or intangible cultural heritage items. In case the areas mentioned in PS8 are identified in the future through specific surveys, institutional opinions and literature reviews, the SEP will need to be revised in accordance with PS8.</li> </ul> |

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#### 9.6.4 Vergo Certificates

| Document Name                         | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Quality Policy                        | <ul style="list-style-type: none"> <li>• Adoption of a customer-oriented approach and regular assessment of stakeholder expectations and needs.</li> <li>• Integration of stakeholder feedback into decision-making processes through the encouragement of innovative and creative ideas.</li> <li>• Systematic collection and analysis of stakeholder opinions in line with the objectives of increasing efficiency and ensuring continuous improvement.</li> <li>• Ensuring transparency and accountability towards stakeholders regarding the implementation of activities in compliance with national and international standards and applicable legislation.</li> <li>• Establishing open, regular, and sustainable communication mechanisms with stakeholders in line with quality objectives.</li> </ul>                                                                                                                                                                                                 |
| Environmental Policy                  | <ul style="list-style-type: none"> <li>• Informing stakeholders on environmental matters and obtaining their views in line with the principles of sustainable development.</li> <li>• Establishment of regular data sharing and feedback mechanisms with relevant stakeholders within the processes of monitoring and evaluating environmental impacts.</li> <li>• Increasing stakeholder awareness regarding practices aimed at the effective and efficient use of natural resources.</li> <li>• Encouraging stakeholder participation in matters related to the reduction of waste at source and the management of environmental risks.</li> <li>• Evaluation of stakeholder recommendations within the scope of continuous improvement of environmental performance and transparent disclosure of the outcomes.</li> </ul>                                                                                                                                                                                   |
| Occupational Health and Safety Policy | <ul style="list-style-type: none"> <li>• Regularly informing employees and relevant stakeholders throughout the processes of compliance with occupational health and safety (OHS) legislation.</li> <li>• Ensuring the active participation of employees in OHS processes (through feedback, suggestion, and notification mechanisms).</li> <li>• Establishment of consultation mechanisms with employee representatives and relevant stakeholders for the early identification of hazards and risks.</li> <li>• Conducting awareness-raising training and information activities aimed at the prevention of occupational accidents and occupational diseases.</li> <li>• Integration of stakeholder contributions into transparent reporting and continuous improvement processes within the scope of ensuring a safe and healthy working environment.</li> <li>• Evaluation of stakeholder feedback within the process of monitoring and improving OHS performance and disclosure of the outcomes.</li> </ul> |
| Human Resources Policy                | <ul style="list-style-type: none"> <li>• Conducting regular information and awareness-raising activities regarding policies and practices aimed at the protection of employees' fundamental rights.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |



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| Document Name        | Stakeholder Engagement Dimension                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                      | <ul style="list-style-type: none"> <li>Establishment of employee feedback and grievance mechanisms in order to ensure a fair, equitable, and non-discriminatory working environment.</li> <li>Encouraging employee participation in the improvement of safe and healthy working conditions.</li> <li>Implementation of surveys, interviews, and consultation processes aimed at increasing employee engagement.</li> <li>Extending stakeholder engagement throughout the value chain by also covering the employees of suppliers and service providers.</li> <li>Strengthening stakeholder trust through transparency, accountability, and regular reporting in line with the IFC Performance Standards and the fundamental principles of the International Labour Organization (ILO).</li> </ul>                                                                                                             |
| <b>Energy Policy</b> | <ul style="list-style-type: none"> <li>Regularly informing stakeholders and conducting awareness-raising activities regarding the efficient use of energy and natural resources.</li> <li>Sharing targets and practices aimed at improving energy performance with relevant stakeholders.</li> <li>Ensuring the participation of employees and relevant technical stakeholders in the implementation processes of energy efficiency technologies.</li> <li>Obtaining stakeholder views on projects aimed at reducing greenhouse gas emissions and transparently disclosing progress information.</li> <li>Evaluating stakeholder feedback within the scope of monitoring and continuously improving the performance of the energy management system.</li> <li>Communicating commitments related to combating climate change to the public and relevant stakeholders through regular communication.</li> </ul> |