



REPORT

R3-Yozgat-1 Wind Power Plant Project

Stakeholder Engagement Plan

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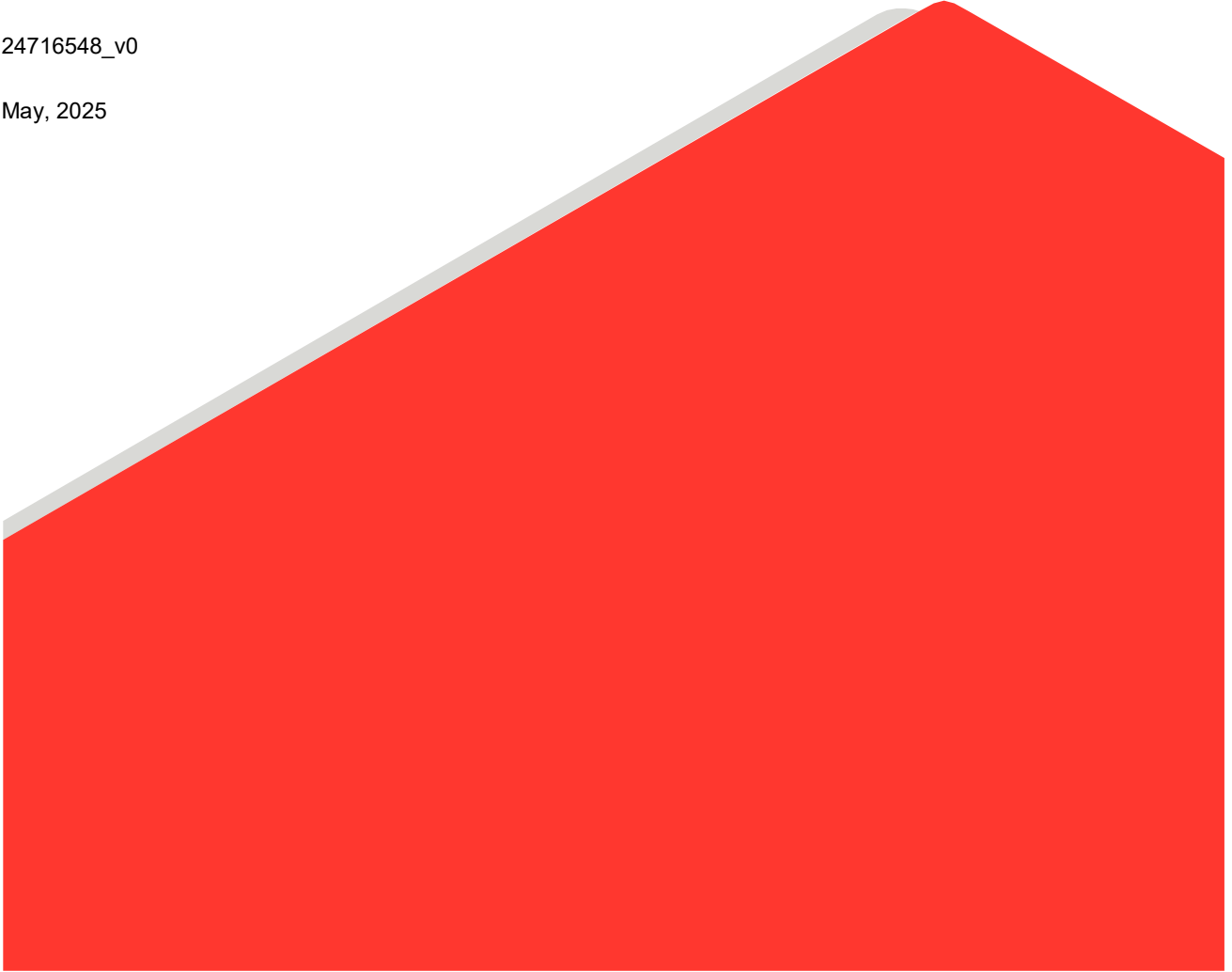
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DEFINITIONS

Grievance Mechanism: IFC Good Practice Note defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Public Consultation: As referred to in this Good Practice Manual, public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups, and organisations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

Stakeholder Engagement Plan: Stakeholder Engagement Plan ("SEP") is a guidance for stakeholder consultations and communications for projects. SEP is a living document should be updated to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

Vulnerable Groups: Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

ABBREVIATIONS

the Project	R3-Yozgat-1 Wind Power Plant Project
Client or Eksim Enerji	Eksim Enerji A.Ş.
WSP Türkiye or WSP	WSP Danışmanlık ve Mühendislik Ltd. Şti.
AoI	Area of Influence
CIMER	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
IFC	International Finance Corporation
KPIs	Key Performance Indicators
MoAF	Ministry of Agriculture and Forestry
MoCT	Ministry of Culture and Tourism
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoND	Ministry of National Defence
MoI	Ministry of Interior
MoTI	Ministry of Transport and Infrastructure
NGOs	Non-governmental organisations
NTS	Non-Technical Summary
PAPs	Project Affected Persons
PSs	Performance Standards
SEP	Stakeholder Engagement Plan

1.0 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for the R3-Yozgat-1 Wind Power Plant (“WPP”) Project (here in after referred as “the Project”) by WSP Danışmanlık ve Mühendislik Ltd. Şti. (herein after “WSP”) on behalf of Eksim Enerji A.Ş. (here in after referred as “Eksim Enerji” or “Client”) for implementing the Project in compliance with the national and international requirements.

Eksim Enerji will construct and operate R3-Yozgat-1 WPP which is located near the Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı Villages of Sorgun and Çekerek Districts of Yozgat Province, with the total installed capacity of 56 MWm / 50 MWe with 8 turbines.

This SEP is developed to enable all processes of interaction with stakeholders who are directly or indirectly affected by the Project or who are interested in the Project’s outcomes. During the execution of the Project, SEP will be implemented in accordance with the requirements of Turkish national laws/regulations, International Finance Corporation (IFC) Performance Standards (PSs) and Equator Principles (EPs) on Social and Environmental Sustainability.

This SEP identifies the Project stakeholders, target groups and the specific engagement activities required for each group of stakeholders of the Project. The SEP is a living document and will be continuously updated to reflect any changes or developments throughout the lifecycle of the Project.

The Project will be committed to the following principles based on the international best practices to obtain effective stakeholder engagement as:

- Commitment to understand, engage and identify the community at the early stages of the Project,
- Integrity in a way that encourages mutual respect and trust,
- Respect the rights, cultural beliefs, values, and interests of stakeholders and affected communities,
- Transparency in community concerns and respond in a timely, open, and effective manner,
- Establishing an inclusive engagement process by ensuring the meaningful participation of vulnerable groups in the Project affected settlements,
- Ensuring equal participation in all stakeholder engagement processes with a gender-sensitive approach, and,
- Establishment of a Project-specific grievance mechanism (both internal and external) to ensure a technically and culturally appropriate approach for engagement with all stakeholders.

1.1 Purpose of the Stakeholder Engagement Plan

A project-specific SEP is a strategic tool to manage relationships, address concerns, and ensure stakeholders are appropriately involved and informed for the project. The purpose of this SEP is to ensure that the Project stakeholders, including the Project affected people and other interested stakeholders, are informed about the Project in a timely manner with consistent, comprehensive, relevant, accessible, and transparent information. The SEP ensures a participatory approach, and the implementation of the SEP is intended to elicit opinions and concerns regarding the Project and its impacts.

The primary objectives of this document are to:

- Identify stakeholders,
- Outline processes for informing stakeholders about the Project,

- Review current stakeholder engagement activities and outline planned future activities,
- Set up a grievance mechanism, including a process for addressing feedback and concerns,
- Define Project commitments, and procedures relevant to this Plan,
- Define roles and responsibilities related to engagement activities,
- Define training requirements; and,
- Establish a framework for monitoring engagement activities.

1.2 Scope of the Stakeholder Engagement Plan

This Plan applies to all Project-related activities, including those of associated facilities and all contractors, during both the construction and operational phases. Once approved by Eksim Enerji, all contractors shall comply with the requirements and standards set out in this Plan.

2.0 PROJECT DESCRIPTION

2.1 Project Overview

The Project design has been changed throughout the time. The Project was initially designed with the total installed capacity of 50 MWm / 50 MWe with 10 turbines and annual production was planned as 200,000,000 kWh. However, the Project design was changed, and the number of the turbines was increased to the 12 with the addition of 2 turbines while total capacity was increased to 84 MWm / 50 MWe. Then, the Project design was changed again, and the number of the turbines was decreased to the 11 with the cancellation of 1 turbine while total capacity was decreased to 77 MWm / 50 MWe. Based on that, an EIA report was prepared for the changed design of the Project in accordance with the requirements of Turkish EIA Regulation, and the “EIA Positive” Decision was obtained from the MoEUCC on December 29th, 2023, with decision number of 7463. The Project was then revised, and the number of the turbines was decreased to the 8 with the cancellation of 3 turbines while total capacity was decreased to 56 MWm / 50 MWe. The official opinion of the MoEUCC regarding the turbine changes and capacity decrease was asked, and the MoEUCC stated that there is no need for additional EIA process and that the “EIA Positive” decision is valid for the revised project in their official correspondence.

Accordingly, Preliminary License (License No. ÖN/11892-21/05590, dated June 8th, 2023) was issued by EPDK on June 8th, 2023, in order to be able to start the investment of the R3-Yozgat-1 WPP for its initial design (total installed capacity of 50 MWm / 50 MWe with 10 turbines). Then, in accordance with the official application of Eksim Enerji to EPDK on June 6th, 2023, regarding to revision of Preliminary License concerning the turbine changes and capacity increase, EPDK approved the revision request in their official correspondence dated July 23rd, 2023. Following the EIA process, in accordance with the official application of Eksim Enerji to EPDK on May 30th, 2024, regarding to revision of Preliminary License concerning the turbine changes and capacity decrease, EPDK approved the revision request in their official correspondence dated June 30th, 2024.

All turbine locations, access roads and switchyard area are in agricultural and forest lands. Based on that, Non-agricultural Land Use Permit Decision was issued by Provincial Directorate of Agriculture and Forestry, while Preliminary Forest Utilization Permit Decision was issued by General Directorate of Forestry. Energy Transmission Line (“ETL”) route passes through irrigated agricultural land, dry agricultural land and forest area.

Within the scope of the Project, energy generated through 8 wind turbines is planned to be transmitted to the existing Çekerek Substation located in Yunus Emre Village of Çekerek District of Yozgat Province, via overhead ETL of 154 kV with a length of 19.1 km. Based on that, an EIA Application File has been prepared on behalf of TEİAŞ for the ETL in accordance with the requirements of Turkish EIA Regulation.

Apart from that, access to the Project Area is provided from existing village roads that connects to D805 Tokat – Yozgat state road. As part of the Project, some extension and improvement work will be performed on these village roads. Additionally, approximately 4.2 km long in-site roads (turbine access roads) will be constructed within the scope of the Project.

The Project is located near the Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı Villages of Sorgun and Çekerek Districts of Yozgat Province. The Project location and nearest settlements including all 8 turbines to be constructed are presented in Figure 1 and Figure 2, respectively.

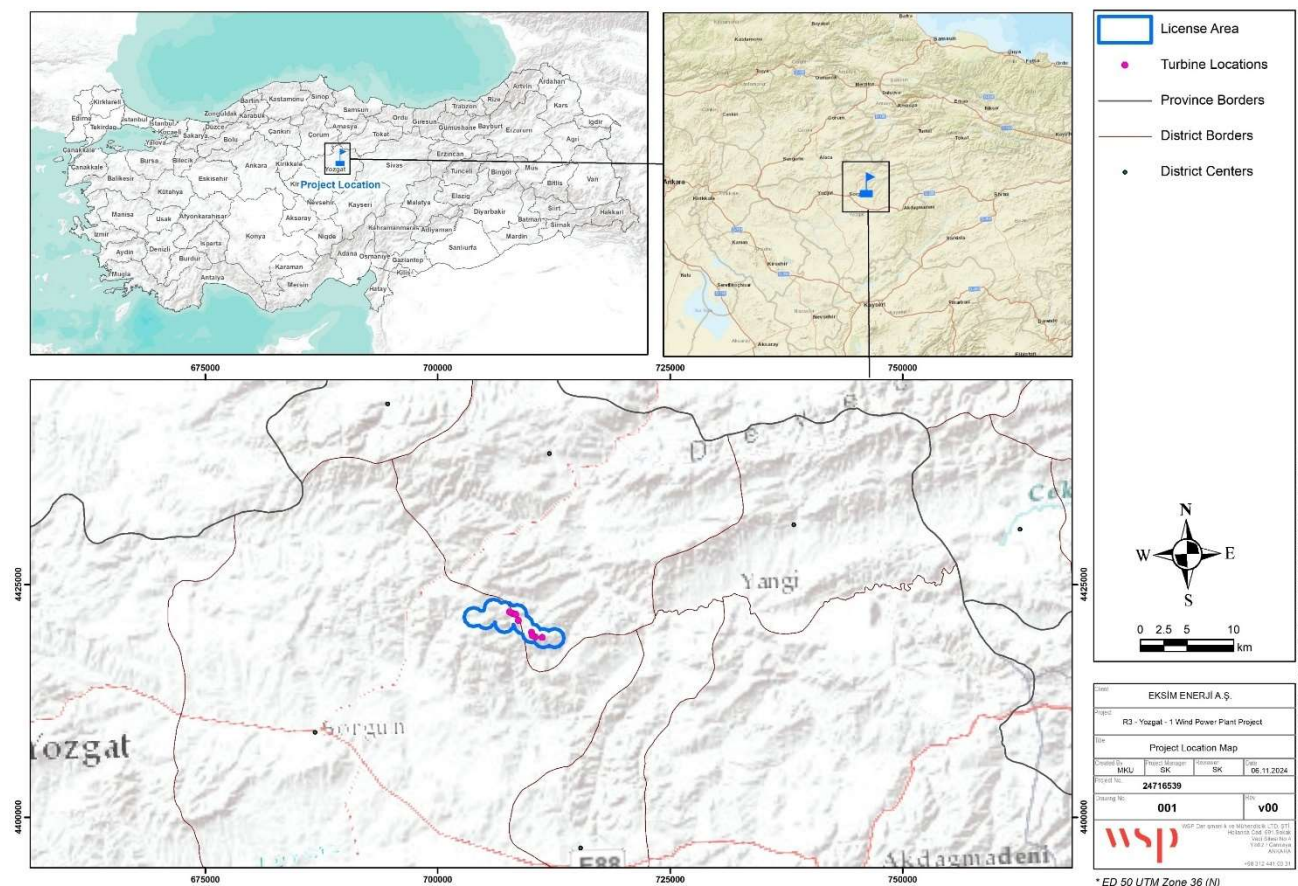


Figure 1: Project Location

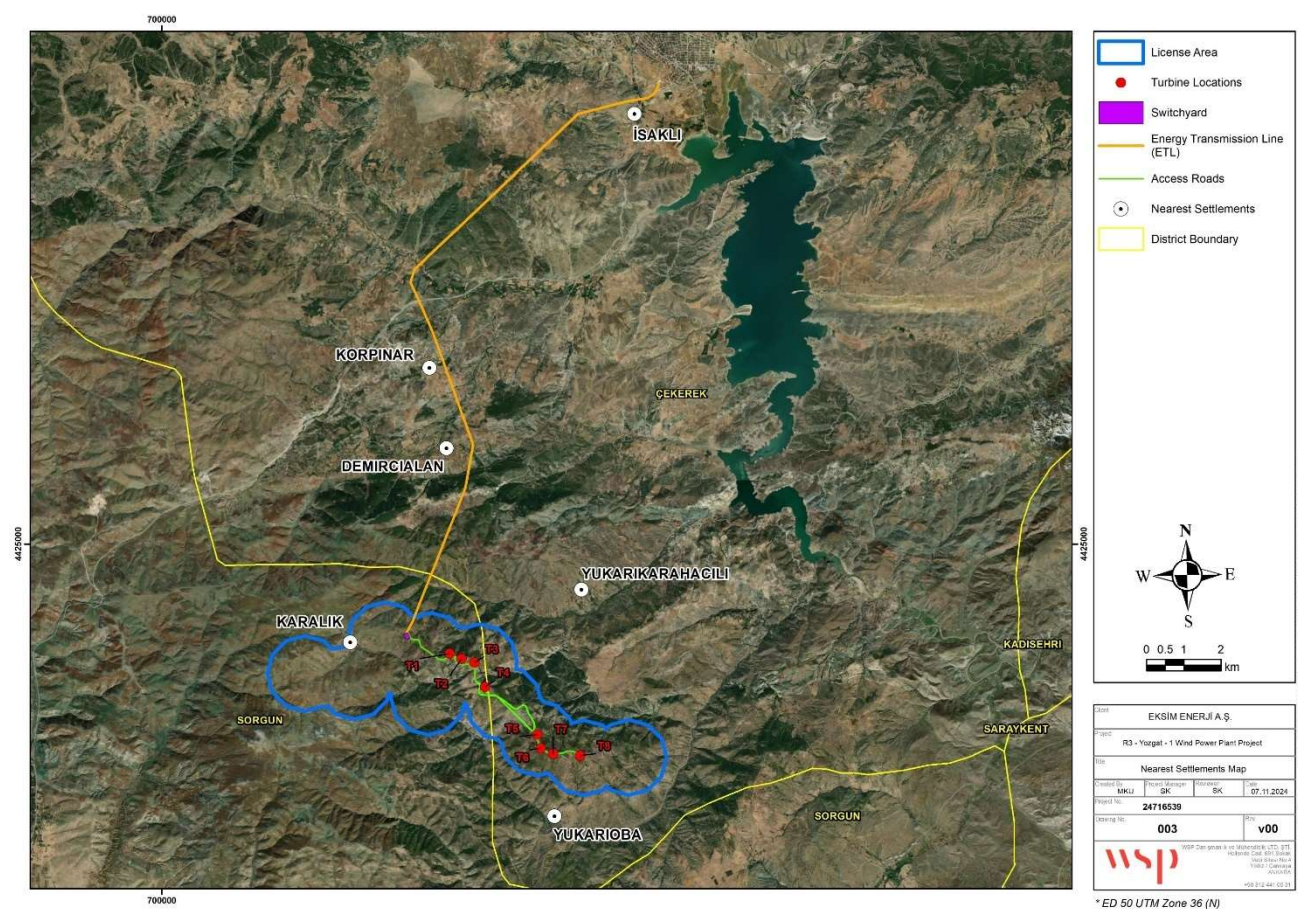


Figure 2: Project Layout and Nearest Settlements

2.2 Project Schedule

Within the scope of the Project, construction phase is estimated as 15 months, while economical lifetime of the Project is estimated as 49 years. Electrical and electromechanical works will be carried out simultaneously with the installation of the turbines. After that, operational tests will be carried out and the Project will become operational.

2.3 Area of Influence

The Area of Influence ("AoI") of the Project is the area in which a direct or indirect impact on the biological, physical, and social components might occur.

As defined by IFC PS1, the Area of Influence encompasses:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.
- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.

- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The settlements that are included in the Aol of the Project and their distances to the nearest turbines are presented in Table 1.

Table 1: Nearest Settlements and Their Distances to the Nearest Turbines

Province	District	Village	Nearest Turbine	Distance to the Nearest Turbine (km)
Yozgat	Sorgun	Karalık	T1	1.13
Yozgat	Çekerek	Yukarıoba	T8	1.45
Yozgat	Çekerek	Yukarıkarahacılı	T3	2.92
Yozgat	Çekerek	Demircialan	T1	5.07
Yozgat	Çekerek	Körpınar	T1	7.60
Yozgat	Çekerek	İsaklı	T1	15.15

3.0 REGULATORY REQUIREMENTS

3.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

3.1.1 The Constitution of The Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment: ARTICLE 56. Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

3.1.2 Other main national laws/regulations

I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

V. Environmental Law and Environmental Impact Assessment Regulation

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens, and the state bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (29.07.2022, OG No. 31907).

The projects requiring an EIA Report, the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29th, 2022.

The relevant requirements regarding the EIA process have been disclosed to the public in accordance with the Environmental Impact Assessment Regulation of the MoEUCC of the Republic of Turkey.

Environmental Impact Assessment Regulation

Information sharing and stakeholder engagement are carried out in accordance with Article 9(5) of the Environmental Impact Assessment (EIA) Regulation, which entered into force upon publication in the Official Gazette dated July 29, 2022, and numbered 31907. This article states:

“A stakeholder engagement plan (SEP) shall be prepared by institutions/organizations authorized by the Ministry in order to inform the public about the project and its impacts, and to gather the public’s opinions and suggestions regarding the project. The prepared SEP shall be submitted as an annex to the EIA application file. If deemed necessary, the Ministry may request the authorized institutions/organizations to carry out additional activities throughout the EIA process for the purpose of informing the public, such as distributing informative brochures, conducting surveys, holding seminars, or creating a project-specific website for information sharing. Additionally, the plan may be updated during the EIA process if requested by the Ministry.”

For projects listed under Annex-1 of the EIA Regulation, it is a legal requirement to organize a “Public Information and Participation Meeting” to inform the local population affected by the project, and to receive their concerns and opinions. This meeting is the only officially structured opportunity for stakeholder engagement. For Annex-2 projects, however, such a public participation meeting is not required.

In line with this regulation, a Project SEP is prepared and included in the EIA Report of the Project.

3.2 International Standards

3.2.1 IFC Performance Standards

IFC’s Sustainability Framework articulates strategic commitment to sustainable development and is an integral part of IFC’s approach to risk management. PSs establish standards that the client is to meet throughout the life of an investment by IFC. Applicable standards guiding social studies are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires the client to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.

- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

3.2.2 Equator Principles (EP)

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry ‘gold standard’ for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group’s Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs. The list of the EPs presented below:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.
- Principle 4: Environmental and Social Management System and EP Action Plan.
- Principle 5: Stakeholder Engagement.
- Principle 6: Grievance Mechanism.
- Principle 7: Independent Review.
- Principle 8: Covenants.
- Principle 9: Independent Monitoring and Reporting.
- Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, “For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. The client will tailor its consultation process to the risks and impacts of the Project, the Project’s phase of development, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion, and intimidation”.

“The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis”.¹

¹ <https://equator-principles.com/>

Principle 6 in specific sets out that “For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project’s environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process”.

The IFC defines stakeholders as individuals or groups who are directly or indirectly affected by a project, as well as those who are not directly affected by a project but have an interest in it and the ability to influence its outcome, either positively or negatively. They may include locally affected communities or individuals and their formal and informal representatives, national or local administrations, politicians, religious leaders and special interest groups, academia or businesses, and direct and indirect workers.

Stakeholder engagement encompasses a range of activities throughout a project’s life, divided into key components:

- **Stakeholder Identification and Analysis:** Identify and prioritize stakeholders by understanding their interests and concerns.
- **Information Disclosure:** Share relevant information with stakeholders early and consistently, ensuring it’s accessible and meaningful.
- **Stakeholder Consultation:** Plan and conduct inclusive consultations, document the process, and communicate outcomes.
- **Negotiation and Partnerships:** Engage in good-faith negotiations on complex issues and form partnerships to add value to mitigation efforts or project benefits.
- **Grievance Management:** Set up accessible systems for stakeholders to raise concerns and grievances throughout the project.
- **Stakeholder Involvement in Monitoring:** Involve stakeholders in monitoring the project’s impacts, mitigation measures, and benefits, while also including external monitors for added transparency.
- **Reporting to Stakeholders:** Provide regular updates on the project’s environmental, social, and economic performance.
- **Management Functions:** Ensure the company has the capacity to manage stakeholder engagement, track commitments, and report progress.

4.0 STAKEHOLDER IDENTIFICATION

The first step in stakeholder engagement is identifying who the project stakeholders are, along with their main groups and subgroups. Following this, stakeholder analysis takes a deeper dive into understanding their interests, how they may be impacted, and the level of influence they might have on the project.

The overall objective of stakeholder identification is to identify and prioritise project stakeholders for informed consultation and participation. Stakeholder identification is a continuous process. The list of identified stakeholders will be evaluated and updated according to the results of the grievance mechanism and for the different phases of the Project and Project updates.

Potential stakeholders will be categorised and prioritised on the basis of stakeholder status, level of interest or ability to influence.

Community Liaison Officer (“CLO”), who serves as key points of contact between the project and its stakeholders, will be appointed to manage communication, gather stakeholder feedback, and oversee the grievance mechanism. If there are female applicants for the CLO role, their applications will be prioritised to encourage women's participation, receive and report gender-specific grievances, and conduct women-only consultation activities when needed.

4.1 Project's Stakeholders

In general, stakeholders can be categorised into two groups:

- Primary stakeholders are the individuals and communities directly affected by the Project's impacts; and
- Secondary stakeholders are those who have an interest or influence on the Project.

Primary stakeholders include:

- International bodies and organisations (e.g. international investors, international financial institutions, international non-governmental organisations (“NGOs”),
- National government agencies,
- Regional government agencies/authorities,
- Local authorities,
- National and local NGOs and organisations,
- Trade Unions and Associations,
- Education and training institutions (e.g. universities, education centres),
- Industry (e.g. construction and infrastructure trade associations),
- Project Affected People (PAPs),
 - Mukhtars/local authorities of Project-affected settlements,
 - Local community members,
 - Landowners and land users (formal and informal land users), and
 - Affected businesses and employees of businesses
 - Vulnerable groups: elderly, people with disabilities, female-headed households, landless households and/or individuals, ethnic minorities, immigrants, refugees, etc.
- Project workers and workers' representatives,
- Third party suppliers of goods and services, contractors and their subcontractors,
- Social services (e.g. hospitals, local schools and other local community services), and
- Media.

Affected settlement of the Project described by deciding AoI. From a social viewpoint, the AoI perspective is also influenced by direct and induced socio-economic influences (including resettlement, economic

displacement, livelihood, health, and safety aspects), spatial implications, intrusion impacts and stakeholder typology. The detailed list of the settlement in Aol presented in Table 1.

Table 2 given below represents the identified stakeholders in accordance with the stakeholder identification approach.

Table 2: Project's Stakeholder Classification

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
Internal Stakeholders				
Project Owner	Eksim Enerji	X		
Subcontractor	Subcontractors who will be working on the Project	X		
Employees	Project employees	X		
Consultants	Project consultants – if any.	X		
External Stakeholders				
International bodies and organizations	Lenders, potential lenders			X
National Governmental Authorities	Ministry of Environment, Urbanization and Climate Change (MoEUCC) Ministry of Transport and Infrastructure (MoTI) Ministry of Culture and Tourism (MoCT) Ministry of Energy and Natural Resources (MoENR) Ministry of Agriculture and Forestry (MoAF) Ministry of Interior (MoI) Ministry of Family and Social Services (MoFSS) Ministry of National Defence (MoND)			X
Regional/Local Authorities	Yozgat Governorship Sorgun District Governorate of Yozgat Çekerek District Governorate of Yozgat Yozgat provincial directorates of central government institutions Sorgun district directorates of central government institutions Çekerek district directorates of central government institutions ORAN Development Agency Yozgat Municipality	X		

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Sorgun Municipality Çekerek Municipality Mukhtars of the affected settlements (villages and neighbourhoods)			
National and Local NGOs and organizations	Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) WWF Türkiye Women-specific associations İŞKUR			X
Trade unions and associations	Yozgat Chamber of Commerce and Industry Yozgat Chamber of Agriculture Yozgat United Chamber of Artisans and Craftsmen	X		
Education and training institutions	Yozgat Bozok University Yozgat Şehit Salih Ekici Vocational Education Centre			X
Social services	Yozgat State Hospital Bozok University Education and Research Hospital Çekerek State Hospital Sorgun State Hospital		X	
Industrial sectors	Yozgat Organized Industrial Zone Bozok Organized Industrial Zone	X		

Type	Stakeholders	Primary stakeholders		Secondary stakeholders
		Direct	Indirect	
	Marble Factories			
Local communities / Affected settlements / Mukhtars	Karalık Village Yukarıoba Village Yukarıkarahacılı Village Demircialan Village Körpınar Village İsaklı Village			
PAPs	Vulnerable groups Landowners Formal Land Users Informal Land Users Project affected businesses Employees of businesses	X		
Media	Yozgat Newspaper İleri Newspaper Yozgat Çamlık Newspaper Yozgat Hakimiyet Newspaper Bozok Meydan Newspaper Sorgun Haber Newspaper Çekerek'in Sesi Newspaper Yozgat FM Radio Sorgun FM Radio			X

4.2 Identification of Vulnerable Groups

According to the IFC definition, vulnerability refers to an individual or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. Other factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources will also be taken into account. Vulnerable groups include the older population, children, persons with disabilities, minorities, and people living in poverty. Vulnerable groups can be affected by the project impacts differently than others and do not have equal access to the project opportunities and benefits.

During the community level surveys conducted in October 2024, vulnerable groups in the settlements of Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı were identified and included in the Project Environmental and Social Due Dilligence Report ("ESDD") (Table 3). The identification of vulnerable groups will be an ongoing process; therefore, the Project CLO will be responsible of identifying and continuing to engage with vulnerable groups throughout the Project's lifespan.

Table 3: Vulnerable Groups in the Settlements

Vulnerable Groups/Individuals	Karaklık	Yukarıoba	Yukarıkarahacılı	Demircialan	Körpınar	İsaklı
Illiterate adults	20	35	50	25	8	20
Does not know Turkish	-	-	-	-	-	-
Seasonal workers	50	20	-	-	-	-
Nomads	-	-	-	-	-	-
Mobile beekeepers	-	-	-	-	-	-
Refugees	-	-	-	-	-	-
Women household head	2	5	30	10	3	5
Children household head	-	-	-	-	-	-
Households whose only income is social support	3	15	60	11	10	8
Children of school age who cannot attend school	-	-	5	-	-	-
Elderly people living alone, in need of help	6	-	10	5	5	2
Physically disabled people	2	-	5	1	-	1
Mentally disabled people	3	-	-	1	-	3
Unauthorized agriculture on public land	2	-	30	-	35	30

From the early phases of the Project, special consideration and assistance will be provided to people identified as vulnerable to ensure inclusivity on decision making, grievance mechanism and consultation. It will be ensured

that targeted consultation is established. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner.

The potential negative impacts on vulnerable groups due to the Project can be minimized by providing assistance for:

- the processes required for applying to legal resources,
- accessing compensation,
- helping to access educational opportunities and professional development programs,
- access to essential public services such as water, electricity, and sanitation.

Additional support such as prioritizing them in recruitment, offering travel support especially for accessing healthcare and education services when needed and supporting the individuals who do not speak the local language or have literacy challenges in understanding official documents or communication processes will be considered and implemented where applicable.

5.0 STAKEHOLDER ENGAGEMENT TOOLS

Table 4 outlines the tools and methods used to support effective stakeholder engagement throughout the Project. In this context, a tool refers to any channel, mechanism, or activity designed to inform, consult, or involve stakeholders in a meaningful way. The aim is to ensure that all stakeholders can access information and participate in the Project using the means most appropriate to their needs and preferences. The effectiveness of these tools will be regularly monitored, and additional or alternative tools may be introduced as needed to enhance engagement.

Table 4: Stakeholder Engagement Tools

Stakeholder Tools	Engagement	Content of the Tools
Community meetings		Held with support from Mukhtars in affected settlements to inform communities about Project impacts, introduce CLO, and explain the grievance mechanism.
Project website		Central online platform for up-to-date Project information and documents. Discloses Environmental and Social (E&S) documents, NTS, SEP, grievance mechanism, Project layout, permits, and CLO contacts.
Online meetings		Conducted with NGOs and governmental institutions where internet access is available.
Phone calls, e-mails text messaging		CLO shares contact details and engages directly with stakeholders to provide information, request feedback, or schedule consultations. Enables all stakeholders to share grievances via a widely phone number available at mukhtar offices, public institutions, and common spaces.
Grievance Mechanism		Structured system for all stakeholders (internal and external) to raise concerns via post, email, phone, or in person. A separate mechanism is available for external and internal grievances.
Grievance boxes for internal stakeholders (mainly for employees)		Boxes placed in accessible areas (e.g., cafeteria, rest zones) for employees to submit concerns and suggestions.

Stakeholder Tools	Engagement	Content of the Tools
Grievance boxes for external stakeholders (mainly for local community)		Located in mukhtar offices, village cafés, and public spaces for easy access by external stakeholders, especially vulnerable groups.
Project posters / brochures / flyers/billboards		Distributed in public areas (e.g., mukhtar offices, municipalities, professional chambers) with Project information and CLO contact details.
Newspaper		Used for public announcements and major Project updates affecting land use or communities.
Face to face meetings		Ongoing, direct engagement with stakeholders on Project topics.
Survey		Used for data collection and feedback, especially related to livelihood restoration or specific Project aspects.
Focus Group Discussions (“FGDs”)		1–1.5-hour discussions with 6–12 people from targeted groups (e.g., women, elderly, disabled, refugees), facilitated by a moderator.
In-depth interviews		Conducted face-to-face for detailed information during various Project phases.
Household visits		Targeted visits to vulnerable individuals (e.g., elderly, female-headed households) who cannot attend public meetings.

6.0 PREVIOUS STAKEHOLDER ENGEMENT AND CONSULTATION ACTIVITIES

Stakeholder engagement involves transparently sharing Project-related information to keep stakeholders informed about activities and developments. This includes facilitating clear and accessible disclosure of E&S information by distributing relevant data and reports to stakeholders. It also entails meaningful stakeholder consultation, implementing a structured approach to engage stakeholders, ensuring their active involvement in the Project’s development through open consultations, soliciting feedback, and integrating valuable insights shared by stakeholders.

6.1 Stakeholder Engagement Activities for EIA Phase

In compliance with the national requirements, as part of the 2023 EIA Report for the Project, a Public Information and Participation Meeting (“PPM”) was held on July 5th, 2023, at 2:00 p.m. at Karalık Village Mosque in Sorgun District of Yozgat Province to inform the public and gather their views and suggestions by the Yozgat Provincial Directorate of Environment, Urbanization, and Climate Change.

Prior to the meeting, announcements were published in a national newspaper (*Hürriyet*) and a local newspaper (*Sorgun Medya*) to inform the local communities about the meeting location and date. The announcements are presented in Figure 3.



Figure 3: PPM Announcement on National and Local Newspapers

The participants were briefed about the Project, and their feedback was gathered. During the meeting, local residents raised questions and provided feedback on various aspects of the Project. The participants inquired about the expropriation of privately-owned parcels. It was explained that the EPDK is responsible for the expropriation process, and prices are determined based on expert appraisals.

Opinions were also raised about potential employment opportunities and local benefits. In response, it was clarified that unskilled labour from the village could be employed during the construction phase, and that resources like tractors needed for the Project could be sourced locally.

Additionally, questions regarding possible radiation and electromagnetic effects from wind turbines were addressed. It was stated that the levels of radiation and electromagnetic emissions from the turbines are minimal.

Moreover, in line with Project standards, Eksim Enerji facilitated reconciliation meetings with individuals affected by land expropriation due to the Project. A similar meeting is planned for landowners along the proposed ETL route, which will be organized in collaboration with TEİAŞ.

Also, opinions of the following institutions were requested through the official letter dated 15.06.2023 and numbered 6674184, issued by the MoEUCC General Directorate of Environmental Impact Assessment, Permit and Inspection:

- MoENR General Directorate of Mining and Petroleum Affairs
- MoAF General Directorate of Nature Conservation and National Parks
- MoAF General Directorate of State Hydraulic Works
- MoAF General Directorate of Forestry
- MoTI General Directorate of Highways
- MoCT Kayseri Regional Board for the Conservation of Cultural Heritage
- General Directorate of Spatial Planning
- General Directorate for the Protection of Natural Assets
- General Directorate of Meteorology
- Yozgat Municipality
- Yozgat Governorship (Provincial Directorate of Environment, Urbanization and Climate Change)
- Yozgat Governorship (Provincial Directorate of Disaster and Emergency Management)

- Yozgat Governorship (Provincial Directorate of Agriculture and Forestry)
- Yozgat Governorship (Provincial Special Administration)

6.2 Stakeholder Engagement Activities for ESDD

Community Level Surveys were conducted with the Mukhtars of all villages included in the social Aol during the site visit conducted for ESDD on October 15th, 2024. Meetings with the Mukhtars of Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı were conducted during the site visit with the attendance from the Project Representatives. On October 23rd, 2024, a telephone interview was conducted with the Mukhtar of Demircialan Village. Community level surveys were conducted, which included questions on demographic profile, socioeconomic structure, and livelihoods of the local communities; infrastructure and services; and ecosystem service usage and land use in the settlements. Also, the anticipated positive and negative impacts of the Project were discussed with the mukhtars. The discussions indicate no anticipation of negative impacts by the Project on the settlements. It is expected that the Project will create employment opportunities and community development through social responsibility projects.

Project officials organized and attended the meetings, facilitating stakeholder engagement. This meeting provided an important opportunity for building and strengthening these stakeholder relationships.

7.0 FUTURE STAKEHOLDER ENGAGEMENT AND CONSULTATION ACTIVITIES

7.1 Stakeholder Engagement Activities for Land Acquisition

Stakeholder engagement activities in relation to land acquisition and expropriation process will be made accordingly to the national regulations and IFC PS 5.

The Project is located near the Karalık, Yukarıoba, Yukarıkarahacılı, Demircialan, Körpınar and İsaklı Villages of Sorgun and Çekerek Districts of Yozgat Province. All turbine locations, access roads and switchyard area are in agricultural and forest lands. Additionally, ETL route passes through irrigated agricultural land, dry agricultural land and forest area.

All actions within the Project Area will be conducted in compliance with the relevant national laws, including Law No. 5403 on "Soil Conservation and Land Use," Law No. 3083 on "Land Reform Regarding Rearrangement of Land in Irrigated Areas," and Law No. 4342 on "Pasture Law," after obtaining the necessary permits. The expropriation processes within the Project scope were carried out in accordance with Expropriation Law No. 2942.

The status of land acquisition process and the engagement with the PAPs are as follows:

- 66 private parcels with a total of 290 landowners and 3 forest lands are affected by the Project's land acquisition.
- For the expropriation of private parcels, negotiation meetings have been held but agreements could not be reached except for 3 private parcels.
- In order to ensure Project's progress, urgent expropriation has been pursued in accordance with the Presidential Decision on Urgent Expropriation (Decision No. 8353, dated April 19th, 2024) after the Decision of Public Interest issued by EPDK on February 22nd, 2024.
- Urgent expropriation was carried out for the land acquisition of access roads and turbine areas, and the related payments have been completed.

- Negotiation meetings have been held for the parcels within the access roads and turbine areas in September 2024. Through the negotiation meetings conducted, agreements have been reached for 3 parcels on compensation and no agreement was reached for 63 out of 66 private parcels regarding expropriation and compensation.
- For the parcels where agreements could not be reached, public land valuation and registration lawsuits on behalf of the landowners were initiated.
- Negotiation meetings will be conducted with the landowners of affected lands along the proposed ETL route, to be organized under the responsibility of TEİAŞ once the land acquisition process for the ETL begins.

Within the scope of the SEP, all targeted stakeholders to be affected by the land acquisition of the Project will be engaged and summary of the engagement records will be reflected as the Project progress.

7.2 Stakeholder Engagement Activities for Information Disclosure

Future stakeholder engagement activities for general information disclosure will focus on enhancing awareness and transparency about the Project. These activities will include public meetings, informational materials, and updates through various communication channels such as the Project website and social media. Scheduled throughout the Project's timeline, they aim to reach all relevant stakeholders, provide key updates, and solicit feedback. Responsibilities for these activities will be assigned to designated team members to ensure effective dissemination of information.

8.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement programme aims to inform, disclose, and consult with all stakeholders using the various engagement tools. Different engagement tools are proposed to ensure informed consultation and participation during the Project implementation in a culturally appropriate manner, respectful of human rights and considering gender inclusion.

8.1 Proposed Programme for Project Phases

The proposed stakeholder engagement programme is presented in Table 5.

Pre-construction activities will focus on disclosure of the Project information, including the Project construction schedule, land acquisition and land access issues. Engagement activities during the construction phase will focus on minimising project-related construction impacts. During the transition from the construction phase to the operation phase, the SEP will be updated to address operational activities.

The SEP will undergo annual updates to incorporate the latest Project developments and information. Stakeholder identification will be reassessed, and the stakeholder list will be updated accordingly.

Regular stakeholder engagement activities will be conducted throughout all Project phases to keep stakeholders informed about Project progress. Special activities during construction, such as energy resource disruptions, or road closures, will be communicated promptly by the CLO to the affected communities.

For the operation phase, the local communities will be informed about the transition period, the impact of the operational phase, the displacement of local employment and the reduction in demand for goods and services. The CLO of the Project will be trained on the implementation of the SEP, and the contact details of the CLO will be provided to all affected stakeholders.

Table 5: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
Before Construction	Project Affected People Project Affected People (PAPs), including landowners, land users, and vulnerable groups	Project information on design, schedule, environmental and social impacts of the Project construction, commissioning and operation Land acquisition, compensation, livelihood restoration, project scope and timeline, grievance mechanism, introduction of the Project CLO, vulnerability and gender considerations	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Each affected settlement, project office, mukhtar offices, public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings as needed based on stakeholder feedback or Project developments 4. If needed	Eksim Enerji Subcontractors of Eksim Enerji
	Local Communities Residents in nearest settlements Mukhtars of the settlements	Project information on design, schedule, environmental and social impacts of the Project construction, commissioning and operation Project impacts, benefits, community development opportunities, environmental and social risks, grievance mechanism, introduction of the Project CLO, vulnerability and gender considerations	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews, public notices,	Nearest settlements, and public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to construction activities, with additional meetings as needed based, if required 4. If needed	Eksim Enerji Subcontractors of Eksim Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
	Governmental Parties Municipalities, governorates, district authorities, academic institutions	Project scope, land acquisition, expropriation procedures, compensation, Project E&S findings, grievance mechanism, coordination roles	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Relevant public institutions, project office	1. & 2. If needed around key milestones or if coordination is required 3. & 4. & 5. If needed	Eksim Enerji
	Non-Governmental Parties NGOs, media, workers' and business organizations	Disclosure of Project documents, stakeholder roles, grievance mechanism, E&S risks	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Project office, NGO offices, affected provinces	1. & 2. If needed when significant environmental/social issues or media/public interest events occur 3. & 4. & 5. If needed	Eksim Enerji
Construction	PAPs	Updated construction status, construction-related grievances, environmental and social awareness, construction phase E&S impacts, community health and safety, local employment, livelihood impacts, construction updates and schedule	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings	Affected settlements, Project office (upon request), mukhtar offices, village public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings as	Eksim Enerji Subcontractors of Eksim Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
			4. FGDs and surveys, in-depth interviews		needed based on stakeholder feedback or Project developments 4. If needed	
	Local Communities	Construction impacts, environmental and social risks, community development opportunities, local employment, community health and safety, grievance mechanism, vulnerability and gender considerations	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Nearest settlements, and public areas	1. & 2. Prior to Construction, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise (e.g., increased traffic, noise complaints) 4. If needed	Eksim Enerji Subcontractors of Eksim Enerji
	Governmental Parties	Construction phase updates, environmental and social risks, grievance mechanism, coordination roles, local employment, community health and safety	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings	Relevant public institutions, Project office	1. & 2. If needed around key milestones or if coordination is required 3. & 4. & 5. If needed	Eksim Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
			4. Stakeholder visits 5. Emails			
	NGOs, Media, Workers' and Business Organizations	Construction-related E&S impacts, stakeholder roles, grievance mechanism, local employment, environmental and social awareness	1. Disclosed NTS and SEP 2. Brochures/leaflets 3. Face-to-face or online meetings 4. Stakeholder visits 5. Emails	Project office and NGO offices	1. & 2. If needed when significant environmental/social issues or media/public interest events occur 3. & 4. & 5. If needed	Eksim Enerji
Operation	PAPs	Transition process from construction to operation, introduction of operation phase CLO, grievance roles, operation phase E&S issues, community health and safety, information disclosure	1. Disclosed SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Each affected settlement, Project office (upon request)	1. & 2. Prior to Operation, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise 4. If needed	Eksim Enerji Subcontractors of Eksim Enerji

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tool	Location	Frequency	Responsibilities
	Local communities	Operation impacts, community health and safety, grievance mechanism, environmental and social risks, introduction of operation phase CLO, role of local employment	1. Disclosed SEP 2. Brochures/leaflets 3. Community meetings, face-to-face meetings 4. FGDs and surveys, in-depth interviews	Nearest settlements, and public areas	1. & 2. Prior to Operation, reviewed for updates every year 3. Once prior to the commencement of construction, with additional meetings if significant impacts arise (e.g., increased traffic, noise complaints) 4. If needed	Eksim Enerji Subcontractors of Eksim Enerji
	Other Interested Parties (External)	Information disclosure (national/local media), operation phase E&S impacts, community health and safety, local employment	1. Project website 2. Newspapers 3. Stakeholder visits	Institution visits, public spaces, and Project office (upon request)	1. & 2. If needed around key milestones or if coordination is required 3. If needed	Eksim Enerji

8.2 Proposed Strategy for the Information Disclosure

Project E&S documents, NTS and the SEP will be disclosed at the Project website and will be available in Turkish and English. The hard copies of the NTS and the SEP will be provided to the mukhtars of the affected settlements.

Further announcement regarding the Project updates and awareness, following tools will be used:

- Project website,
- The notice boards of the mukhtars' offices, and
- Leaflets and banners.

It is anticipated that NGOs, associations, and other interested organizations will be notified on the disclosure process and website links for the Project documents will be shared. When requested, hard copies of the disclosure documents will be sent via post mail.

During the Project development and construction phase, the CLO will prepare quarterly reports that present the Project's social performance and the engagement activities, and the grievance mechanism outputs.

8.3 Proposed Strategy for Consultation

This SEP is developed to engage with the stakeholders during different Project phases to inform stakeholders on the Project activities, resolve their grievances, and involve stakeholders during the decision-making processes in a participatory approach. In order to establish sound stakeholder engagement activities, the following consultations strategies will be applied from the early phases of the Project, where possible:

- A CLO will be appointed for the Project.
- Targeted consultations will be carried out with the identified vulnerable groups to ensure their participation during the information disclosure, engagement, and grievance management.
- All proposed engagement tools will provide the name of the CLO, the contact details, and the grievance mechanism.

9.0 GRIEVANCE MECHANISM

The *IFC Good Practice Note: Addressing Grievances from Project-Affected Communities 2009* defines a grievance as "a concern or complaint raised by an individual or a group within communities affected by company operations" (p. 8). Projects should develop a grievance mechanism to provide a structured way for addressing these concerns, ensuring transparency and responsiveness in handling grievances. This procedure is designed to outline indicators for effectively managing community and employee complaints that may arise from Project activities.

A Grievance Mechanism (GM), including a grievance form, has been established and disclosed within the Project EIA Report. The Project's GM will be developed as a part of this SEP, ensuring that the grievances from the stakeholders are resolved in a fair, transparent, and timely manner.

The Grievance Mechanism will cover all internal and external stakeholders and all employees. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies. The objectives of the grievance mechanism are to:

- Provide affected people with culturally appropriate ways and means of stating their grievances during the Project (from site preparation to decommissioning phase),
- Ensure that grievances are treated confidentially and are not shared outside the process,
- Establish transparent and mutually respectful relations with communities,
- Ensure that corrective actions are identified and taken,
- Verify that affected people are satisfied with the corrective actions taken, and
- Avoid the need for judicial actions; the grievance mechanism, however, does not prevent stakeholders from accessing the judiciary system.

Grievances can be submitted by internal and external stakeholders through the following methods:

- Grievance boxes accessible at the settlements and the Project site,
- Submitting a grievance in person to mukhtars and/or grievance form to be submitted via mukhtar,
- By mail (to the postal address of Eksim Enerji),
- Via e-mail to Eksim Enerji,
- Submitting a grievance to the CLO by telephone,
- Submitting a grievance in person to the CLO.

The requests will be logged in a Request & Grievance Log / Database. The request will be logged as a worker or community request and the grievances will be logged in a grievance registration system by Eksim Enerji in categories. The grievances can be categorized as:

- Environmental issues (e.g., noise, dust, waste management) related complaints,
- Labour or occupational health and safety-related complaints,
- Complaints or reports regarding damages and losses caused by construction activities,
- Reports of discriminatory treatment based on gender, age, disability, religion, language, race, sect, ethnicity, social status, political views, health condition, marital status, etc.,
- Grievances related to Gender-Based Violence and Harassment (“GBVH”), sexual abuse, harassment, exploitation, and assault,
- Complaints or concerns related to land acquisition, including disputes or grievances regarding compensation, land rights, or relocation.

The grievance management process will follow these key steps to ensure timely and effective resolution:

- 1) **Grievance Submission** – Stakeholders may submit grievances through various accessible channels (e.g., in person, via phone, email, or grievance boxes).
- 2) **Registration and Logging** – Each grievance will be recorded in the grievance register, assigned a reference number, and categorized for tracking.
- 3) **Acknowledgement** – Complainants will receive confirmation of receipt within a defined timeframe.
- 4) **Review and Assessment** – The grievance will be evaluated to determine its eligibility, seriousness, and urgency.

- 5) **Investigation and Response** – A fair and transparent investigation will be conducted, followed by a proposed resolution or corrective action.
- 6) **Feedback and Closure** – The proposed outcome will be shared with the complainant. If accepted, the grievance will be formally closed and documented.
- 7) **Follow-up (if needed)** – In cases requiring corrective action, follow-up will be conducted to verify implementation and effectiveness.

9.1 Governmental Grievance Mechanism- all stakeholders

The public can raise any issues, complaints, and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and state open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints, and requests can be both received and responded to through this national online system.

The CIMER system enables stakeholders to communicate directly with Eksim Enerji during the Project lifespan. Still, a separate grievance mechanism system will be established for the Project in which the stakeholders can receive their responses locally and communicate their complaints. This Project-level grievance system will be established within Eksim Enerji, implemented, and followed during the Project lifespan.

Affected communities will be informed of their right to escalate grievances through the Project grievance mechanism and, if the Project GM response is unsatisfactory, through alternative mechanisms such as CIMER.

9.2 Internal Grievance Mechanism – for Workers

Eksim Enerji's internal grievance mechanism will be implemented for the use of all Project workers, including both direct and indirect employees. This mechanism enables workers to raise concerns about any condition that allegedly harms them, ensuring fair and respectful resolution. Grievances may relate to issues such as internal communication breakdowns, misuse of authority, discrimination based on race, colour, national origin, religion, age, sex, sexual orientation, gender identity, sexual harassment, or disability status.

Workers will have the right to submit grievances anonymously if they choose, and confidentiality will be strictly maintained. Eksim Enerji will not share the identity of any grievance holder without their explicit consent. When consent is provided, only those directly involved in resolving the grievance will be informed. Results or outcomes of anonymous grievances will be announced via internal bulletin boards, regular toolbox meetings, or other general staff communication channels to ensure transparency without compromising anonymity.

A gender-sensitive approach will be integrated into the mechanism to effectively address cases of GBVH throughout the Project lifecycle. All GBVH-related grievances will be handled by nominated, trained staff who are sensitive to GBVH issues. The mechanism will support affected individuals and allow anonymous submissions. Hence, the grievance mechanism ensures that all stakeholders, including vulnerable groups and survivors of GBVH, have a structured and formal means to report complaints and receive prompt, fair, and effective responses.

Workers will have access to multiple grievance channels such as:

- **Grievance Boxes:** Secure and clearly marked boxes will be placed at easily accessible locations such as worker accommodation areas, canteens, and entrances to work sites.
- **Grievance Forms:** A standardized grievance form will be made available near grievance boxes and in common areas. A sample form is included in APPENDIX B of this SEP.

- **In-Person Submission:** Workers may submit grievances directly to worker representatives or designated personnel, which will then be formally logged.
- **Email or Phone Submission:** An internal grievance can be submitted through email address and phone line of the Eksim Enerji.

9.3 External Grievance Mechanism – for communities

Eksim Enerji will implement an external grievance mechanism as part of the Project's management system to respond to any concerns raised by affected communities and stakeholders. The primary objective is to provide transparent and accessible channels for stakeholders to submit concerns, receive information, and obtain timely and fair resolutions.

Grievances can be submitted through various channels, including:

- **Grievance Forms:** Available on the Project website, at the construction site, in mukhtar offices, and at key Project facilities. (A sample external grievance form is presented in APPENDIX C.)
- **Mukhtars:** Local mukhtars can collect and forward grievances to the Project CLO.
- **CLO In Person:** The CLO will be available on-site to receive and address concerns.
- **CLO Telephone Line:** A dedicated phone line will be set up for verbal submissions.
- **Project Email Address:** An official email address in the Eksim Enerji's web site will be used for electronic submissions.

These channels will ensure that community members have various accessible options for raising their concerns and seeking resolutions. For **anonymous complaints**, the results and responses will be shared through general channels such as public information boards at the mukhtar's office or site entrance areas, without disclosing any sensitive details.

All received grievances will be logged in a grievance registration system by Eksim Enerji.

Designated and trained staff will maintain a grievance log, tracking submission details, follow-up actions, and outcomes.

Grievance management process:

- All grievances will be **acknowledged within 3 days** of receipt.
- A formal **response will be provided within 30 days**.
- **Land-related grievances will be prioritized and resolved within 7 days** to ensure the timely continuation of land access and project activities.

The workflow of the grievance mechanism is shown in Figure 4.

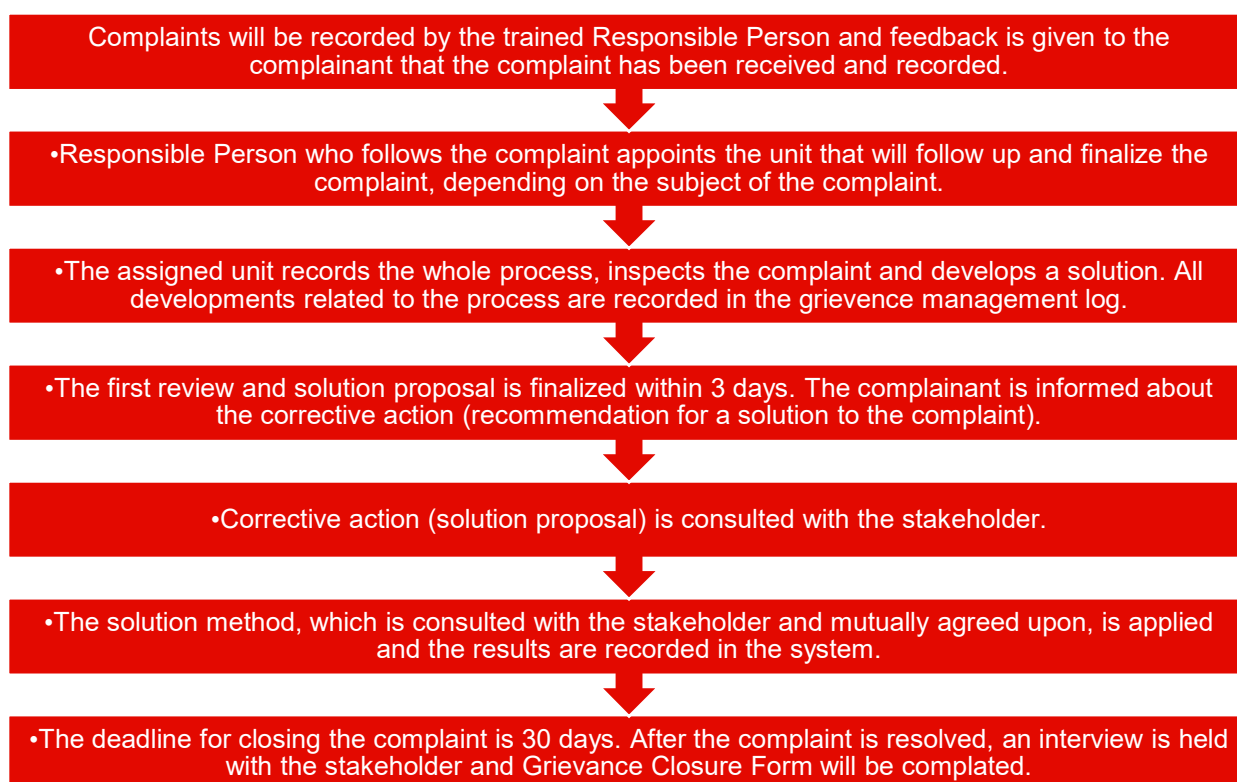


Figure 4: Grievance Management Workflow

The grievance mechanism will be widely announced to the public through stakeholder engagement activities. Tailored engagement will be organized to target women and vulnerable groups to share Project information as well as information on Project GM.

9.4 Receiving and Assessment of Anonymous Grievances

If external and internal stakeholders have difficulties in providing their contact information or/and identification; grievances submitted by stakeholders will be evaluated and recorded as anonymous complaints or anonymous suggestions.

Stakeholders can convey all of their wishes and complaints, without specifying their names, to the grievance boxes placed at specific points for external stakeholders or via Eksim Enerji phone number in its website.

Grievances are received anonymously and assessed by applying the steps defined in the workflow. To protect confidentiality, cameras are not installed in areas where complaints are submitted. This prevents the disclosure of complainants' identities and ensures their anonymity. Within the scope of the complaint, it will be evaluated through investigation/examination processes and each stage will be recorded in the complaint mechanism system. Third parties will not be informed about complaints that need to be kept confidential.

When the grievance is concluded, although there will be no formal feedback on the solution to be implemented, if it is an issue that needs to be informed by the public and if deemed necessary, it can be announced to the stakeholders through common boards/ public and general communication tools.

10.0 MONITORING

The monitoring activities will be carried out throughout the Project phases to assess the compliance of the SEP with the Project standards. In the event that the non-conformance with the Project standards identified through monitoring, these will be investigated, and appropriate corrective actions will be identified.

The Project SEP will be reviewed and updated annually, and in different Project phases. Grievances will be recorded and collected monthly, with quarterly reports submitted to Project Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used for evaluation of:

- transparency and accessibility of the engagement process,
- provision of relevant information,
- timeliness of responses (ongoing communication),
- clarity and simplicity of information provided,
- project impacts, and
- applicability and relevance of the information provided.

A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. Table 6 summarizes the KPIs and associated key monitoring actions that will be used to assess the progress and effectiveness of the SEP.

Table 6: KPIs and monitoring actions – Stakeholder Engagement

ID	KPI	Target	Monitoring Measure
Consultation and Information Disclosure			
SEP-KPI-01	Registration of stakeholder engagement activities	Target of 100%	Stakeholder Meeting Register
SEP-KPI-02	<ul style="list-style-type: none"> ■ Consultation records ■ Materials shared with the stakeholders (brochure, presentations) ■ Number of the meetings held ■ Number of the participants who attended the public consultation meetings ■ Visits to local authorities or other local stakeholders ■ Frequency of the visits to the settlements affected by the Project ■ Number of newspapers to share the information ■ Any updates on the Project website ■ Any type of announcements (information banners, calls) 	Development of regular reports on the consultation activities	Reporting
SEP-KPI-03	<ul style="list-style-type: none"> ■ Disclosure of Project's E&S documents 	Disclosure of documents on an annual basis	Project Website
Implementation of Grievance Mechanism			
SEP-KPI-04	Number of grievances received from community	The total number reduced per year	Grievance Log / Database

ID	KPI	Target	Monitoring Measure
SEP-KPI-05	Number of grievances responded to within targeted time frame	The target of 100%	Grievance Log / Database
SEP-KPI-06	Reporting of grievance records summaries	Quarterly	Reporting
SEP-KPI-07	Reporting back to stakeholders in the implementation of the grievance mechanism	Delivery of regular reports to stakeholders on the outcomes of the grievance mechanism	Reporting
SEP-KPI-08	Auditing the SEP and grievance mechanism to ensure that they are being implemented and that grievances are being adequately addressed.	Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame	Annual Assessment Report / Audit report

11.0 TRAINING

All relevant workers of the Project and contractors' workers will receive induction training, which will include general awareness-raising on environmental and social requirements. As part of this induction, all workers will be informed about the Project's SEP and Grievance Mechanism, including how to submit grievances, confidentiality provisions, and available support channels.

In addition to the general induction training, targeted training on stakeholder engagement and the implementation of the Grievance Mechanism will be delivered to the CLO, as well as other key staff of Eksim Enerji and its subcontractors who are directly involved in or responsible for community-facing activities under the supervisors of Eksim Enerji.

The need for refresher training on the SEP and the Grievance Mechanism will be periodically assessed by the CLO and repeated as necessary to ensure continued awareness and effective implementation.

12.0 REPORTING AND AUDIT

Grievances will be recorded and collected monthly, with quarterly reports submitted to Project Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used to assess both the number and nature of complaints/grievances (if any), along with the Project's ability to address grievances in a timely and effective manner.

For transparency and effective stakeholder engagement, the Project will disclose the Project SEP and NTS at the Project website. Additionally, grievance mechanism summary reports will be ready to share upon request, detailing how stakeholder grievances are received, addressed, and resolved, ensuring accountability and trust throughout the Project lifecycle.

To inform external stakeholders, the Project will annually disclose statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance.

Eksim Enerji will internally monitor compliance with this SEP in accordance with its requirements. Periodic assessments will be conducted to ensure adherence to the plan, including auditing the grievance mechanism to confirm its proper implementation and effective resolution of grievances. The annual assessment report of the SEP and GM will serve as an official audit report.

Records will be kept on the following subjects:

- 1) Consultation meetings.
- 2) Stakeholder engagement activities.
- 3) Grievances raised and actions taken to close them
- 4) Opinions/suggestions/comments provided by the community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism).
- 5) Press releases and interviews.
- 6) Records of audits, inspections and incidents.

Reporting requirements are presented in Table 7.

Table 7: Reporting & Monitoring Time Frame

Monitoring Type	Frequency	For	Content
Reporting	Quarterly	Project management	Detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting	Annually	Project management / Local communities	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Performance Monitoring	Biannual	Project management	Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of stakeholders/PAPs consultations/meetings
Impact Monitoring	Biannual	Project management / PAPs	Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions

13.0 ROLES AND RESPONSIBILITIES

Eksim Enerji has the overall responsibility in relation to implementation of the SEP. During the construction phase of the Project, the following roles and responsibilities will be implemented by Eksim Enerji. The roles and responsibilities will be updated for each Project phase where relevant.

Table 8: Roles and Responsibilities

Role	Detailed Responsibilities
General Manager	<ul style="list-style-type: none"> ■ Approval of this SEP and resources required for implementation.

Role	Detailed Responsibilities
	<ul style="list-style-type: none"> ■ Ensure adequate resources are provided for implementation of this SEP. ■ Monitoring the correct and effective implementation of the SEP. ■ Overall responsible for ensuring the implementation of all environmental and social management plans. ■ Assist the Project and the Site Manager when required.
Project Manager	<ul style="list-style-type: none"> ■ Oversight of environmental inspections and mitigation measures implementation. Maintaining records of environmental monitoring activities. ■ Manage, improve, monitor and update this SEP and ensure effective implementation of the management measures. ■ Ensure technical support is provided to Contractors for implementation of the SEP. ■ Ensure related trainings are provided by the Contractors, through review of training records and related training documents. ■ Conduct/organize periodic audits. ■ Organize trainings related to this SEP. ■ Ensure the SEP is distributed to all Contractors. ■ Ensure targeted KPIs covered in the SEP are met within the given timeline.
Site Manager	<ul style="list-style-type: none"> ■ Ensure the implementation of this SEP. ■ Routine monitoring/inspections of the Project Area and effectiveness of management measures. ■ Record non-compliances, propose corrective actions (if required) and follow-up of the actions. ■ Ensure the worker grievance mechanism is being announced and easily accessible to all workers. ■ Monitor the performance of the Contractors. ■ Support CLO when and/if corrective action of a grievance requires Site Manager's decision/action. ■ Monitor the regular reports of the CLO and the grievance records.
Contractors Project Managers and EHS Managers	<ul style="list-style-type: none"> ■ Develop its own procedure to fully implement this SEP. ■ Ensure compliance with Project Standards and contractual agreements. ■ Ensure related non-compliances are recorded and responded to immediately. ■ Conduct internal audits and record identified incompliances.

Role	Detailed Responsibilities
	<ul style="list-style-type: none"> ■ Provide related trainings. ■ Provide staff, equipment and material for management measures.
CLO	<ul style="list-style-type: none"> ■ Maintain ongoing relations with the targeted stakeholders and identify new stakeholders as the Project progress. ■ Provide Project related information on behalf of Eksim Enerji. ■ Manage Grievance Mechanism. ■ Ensure grievance mechanism is publicly announced and easy to access for all stakeholders. ■ Ensure all grievances are received and addressed within the targeted deadlines. In case the resolution process exceeds the targeted deadline, ensure to communicate with the complainant about the ongoing process. ■ Keep all records of the stakeholder engagements (formal and/informal) logged in a database. ■ When required, work with relative departments to resolve the grievances. ■ Ensure that the SEP is being updated accordingly. ■ Provide regular reporting and outcomes of the grievance mechanism. ■ Ensure employment opportunities are being promoted within the affected communities.
All employees (direct and/or indirect)	<ul style="list-style-type: none"> ■ Participate in the trainings. ■ Ensure compliance with management measures.

14.0 LIABILITIES

A CLO will be assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management of the Project.

Project website: <https://eksimenerji.com.tr/iletisim>

Project Site: To be disclosed.

Eksim Enerji Communication Phone Number: +90 216 544 24 00

e-mail: info@eksimenerji.com.tr

The contact number of the CLO will be disclosed.

15.0 REFERENCES

- EIA Report of R3-YOZGAT-1 WIND POWER PLANT (11 TURBINE, 77 MWM/50 MWE), 2023

- International Finance Corporation. (2009, August 31). *Addressing grievances from project-affected communities: Guidance for projects and companies on designing grievance mechanisms*. World Bank Group. <https://www.ifc.org>
- Equator Principles Association. (2020). *The Equator Principles (EP4, EP5, EP6)*. <https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020.pdf><https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>

APPENDIX A

Stakeholder Engagement Activity Registration Template

No	Date	Project Party conducted to engagement activity	Name of the stakeholder/participants (if provided)	Type of consultation	Aim of the consultation	Location of the consultation	Summary of the engagement activity

APPENDIX B

Sample Internal Grievance Form

EMPLOYEE GRIEVANCE FORM	
To be filled out by the employee – Grievance holder	
Date of the grievance (complaint/opinion/suggestion/ request)
Full Name of the employee <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i> <input type="checkbox"/> I request non-disclosure of my identity information <input type="checkbox"/> I would like to submit an ANONYMOUS claim
Company Information
Contact Information <i>Please mark how you wish to be contacted</i>	<input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By person:..... <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:..... <input type="checkbox"/> Other:.....
The grievance history	Occurred in <input type="checkbox"/> One-time event <input type="checkbox"/> Multiple times (...) <input type="checkbox"/> Continues/on-going
Detailed description of the Grievance: <i>Please add if any visual material available (photography video etc.)</i>	
Have you ever filed a grievance form on the same issue before? (Please specify)	
How can your complaints be resolved? Please provide your suggestions.	

Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives

How was the comment received?

- ☐ In person
☐ By phone
☐ By mail
☐ By grievance box number: (please include the box number)
☐ Other (please describe)

Grievance registration number and date:**Grievance Recorder:****Related Department:****Closing the Grievances****ASSESSMENT and PROPOSED ACTIONS:****ACTIONS TAKEN:****Grievance closure date:****Grievance Holder**
First-Last Name and Signature**On Behalf of Eksim Enerji**
Title-First Name-Surname and Signature

APPENDIX C

Sample External Grievance Form

Introductory Information	
Date of the grievance (complaint/opinion/suggestion/request)
Full Name of the stakeholder <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i> <input type="checkbox"/> I request non-disclosure of my identity information <input type="checkbox"/> I would like to submit an ANONYMOUS claim
Province/District/Settlement <i>where the grievance occurred</i>
Contact Information <i>Please mark how you wish to be contacted</i>	<input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By person:..... <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:..... <input type="checkbox"/> Other:.....
The grievance history	Occurred in <input type="checkbox"/> One-time event <input type="checkbox"/> Multiple times (...) <input type="checkbox"/> Continues/on-going
Information about the Grievance	
Detailed description of the Grievance: <i>Please add if any visual material available (photography video etc.)</i>	
Have you ever filed a grievance form on the same issue before? (Please specify)	
Do you know if any other locals that are experiencing the same issue? (Please provide the names and the contact details)	

How can your complaints be resolved? Please provide your suggestions.			
Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives			
How was the comment received? <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> By mail <input type="checkbox"/> By grievance box number: (please include the box number) <input type="checkbox"/> Other (please describe)			
Grievance registration number and date:		Grievance Recorder:	
Closing the Grievances			
Detailed explanation related to actions taken, date, monitoring of the action etc.: 			
Grievance closure date:			
Grievance Holder First-Last Name and Signature		On Behalf of Eksim Enerji Title-First Name-Surname and Signature	

APPENDIX D

Grievance Closure Form

Grievance Closure Form	
Date of the grievance (complaint/opinion/suggestion/ request)
Grievance registration number and date:
Province/District/Settlement where the grievance occurred
Grievance Details	
Description of the Grievance:	
Actions Taken	
Detailed Explanation of Actions Taken:	
Date of Actions Taken: _____	
Monitoring and Follow-up Actions:	
Grievance closure date:	
Outcome:	
Grievance Holder First-Last Name and Signature <i>Note: The grievance holder can remain anonymous if they prefer or request not to disclose their identity to the third parties without their consent</i>	On Behalf of Eksim Enerji Title-First Name-Surname and Signature

APPENDIX E

Grievance Log / Database

Grievance ID (Registration No)	Date	Company Representative Who Recorded the Grievance	Internal/External	Grievance Holder	Province/District/Village of the Grievance Holder or Company of the employee	Grievance Subject	Short description of the grievance	Related Department	Suggested Action	Action Taken	The date of the action taken	Grievance Status	Closure date of the grievances



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