



REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE



TÜRKİYE EMERGENCY ROAD REHABILITATION AND RECONSTRUCTION PROJECT



STAKEHOLDER ENGAGEMENT PLAN

CNR-KGM-TERRRP-SEP-001

Final

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|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 2 / 48 |



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| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 3 / 48 |

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TABLE OF CONTENTS

| | |
|---|-----------|
| TABLE OF CONTENTS | 4 |
| LIST OF TABLES | 6 |
| LIST OF FIGURES | 6 |
| ABBREVIATIONS AND ACRONYMS | 7 |
| 1 INTRODUCTION | 8 |
| 1.1 Project Description..... | 8 |
| 1.2 Scope and Objectives..... | 11 |
| 2 LEGAL FRAMEWORK | 12 |
| 2.1 National Legislation | 12 |
| 2.1.1 The Constitution of The Republic of Türkiye | 12 |
| 2.1.2 Civil Law | 12 |
| 2.1.3 Law on the Right to Information..... | 12 |
| 2.1.4 Law on the Use of Right to Petition | 12 |
| 2.2 International Standards | 13 |
| 2.2.1 AIIB’s Environmental and Social Framework | 13 |
| 3 ROLES AND RESPONSIBILITIES | 15 |
| 3.1 Organizational Structure..... | 15 |
| 3.2 Roles and Responsibilities | 17 |
| 4 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES | 19 |
| 5 STAKEHOLDER IDENTIFICATION | 22 |
| 5.1 Methodology of the Identification..... | 22 |
| 5.2 Project Area of Influence | 22 |
| 5.3 Stakeholders..... | 25 |
| 5.3.1 Affected Parties and Other Interested Parties | 25 |
| 5.3.2 Vulnerable Groups..... | 29 |
| 6 STAKEHOLDER ENGAGEMENT PROGRAM | 30 |
| 6.1 Information Disclosure..... | 30 |
| 6.2 Methods and Tools of Stakeholder Engagement and GRM..... | 31 |
| 6.3 Stakeholder Engagement Program | 33 |
| 7 GRIEVANCE REDRESS MECHANISM | 37 |
| 7.1 Integration of Project Level Grievance Redress Mechanism | 37 |
| 7.1.1 Recording and Evaluation of Anonymous Complaints | 37 |
| 7.1.2 Addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) | 38 |
| 7.2 Internal Grievance Redress Mechanism (Worker GRM)..... | 39 |
| 7.3 CİMER: Turkish Presidential Communication Center | 40 |
| 7.4 AIIB Project-Affected People’s Mechanism (PPM)..... | 40 |
| 7.5 Workflow of the Project Level GRM..... | 41 |



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 5 / 48 |

7.6 Monitoring and Reporting 42

ANNEX 1: GRIEVANCE LOG..... 44

ANNEX 2: REVISED GRIEVANCE REPORTING FORM FOR REAL PERSONS 45

ANNEX 3: COMPLAINT APPLICATION FORM TO BE USED FOR WRITTEN COMPLAINTS TO BE RECEIVED THROUGH CHANNELS OTHER THAN THE WEBSITE (VIA MUKHTAR, LETTER, EMAIL, ETC.). 47

ANNEX 4: SAMPLE GRIEVANCE CLOSURE FORM 48



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 6 / 48 |

LIST OF TABLES

| | |
|--|----|
| Table 1. Project Summary Information | 8 |
| Table 2. Classification of the Sub-projects | 9 |
| Table 3. Roles and Responsibilities Regarding the Implementation of the SEP&GRM..... | 17 |
| Table 4. Stakeholder Engagements During ESIA&ESMP Development Studies | 20 |
| Table 5. Project Aol Settlements and Region | 24 |
| Table 6. Stakeholders of the Project | 25 |
| Table 7. Stakeholder Engagement Program | 33 |
| Table 8. Principles and Standards of the GRM Workflow | 41 |
| Table 9. Monitoring Plan for the SEP | 43 |

LIST OF FIGURES

| | |
|--|----|
| Figure 1. Project Locations Map..... | 10 |
| Figure 2. ESMS Organizational Structure | 16 |
| Figure 3. Project Aol Diagram | 23 |
| Figure 4. Project Aol location in Türkiye..... | 24 |



ABBREVIATIONS AND ACRONYMS

| | |
|--------------------|--|
| AIIB | Asian Infrastructure Investment Bank |
| BOTAŞ | Petroleum Pipeline Corporation |
| CHPRBD | Cultural Heritage Preservation Regional Board Directorate |
| CHS | Community Health and Safety |
| ÇİMER | Turkish Presidential Communication Centre |
| ÇINAR | Çınar Engineering Consultancy Inc. |
| CLO | Community Liaison Officer |
| CNHPRP | Cultural and Natural Heritage Preservation Regional Board |
| E&S | Environmental and Social |
| EIA | Environmental Impact Assessment |
| ESEL | Environmental and Social Exclusion List |
| ESF | Environmental and Social Framework |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| ESMS | Environmental and Social Management System |
| ESP | Environmental and Social Policy |
| ESS | Environmental and Social Standards |
| EU | European Union |
| GBVH | Gender Based Violence and Harassment |
| GDCHM | General Directorate of Cultural Heritage and Museums |
| GRM | Grievance Redress Mechanism |
| ILO | International Labor Organization |
| KGM | General Directorate of Highways |
| LAP | Land Acquisition Plan |
| LARP | Land Acquisition and Resettlement Plan |
| LRP | Livelihood Restoration Plan |
| MoAF | Ministry of Agriculture and Forestry |
| MoCT | Ministry of Culture and Tourism |
| MoEUCC | Ministry of Environment, Urbanization and Climate Change |
| MoTI | Ministry of Transport and Infrastructure |
| NGO | Non-governmental Organization |
| OHS | Occupational Health and Safety |
| OIZ | Organized Industrial Zone |
| PDoAF | Provincial Directorate of Agriculture and Forestry |
| PDoCT | Provincial Directorate of Culture and Tourism |
| PDoEUCC | Provincial Directorate of Environment, Urbanization and Climate Change |
| RP | Resettlement Plan |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| SuTP | Syrians under Temporary Protection |
| TAG Highway | Tarsus Adana Gaziantep Highway |
| The Project | Türkiye Emergency Road Rehabilitation and Reconstruction Project |



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 8 / 48 |

1 INTRODUCTION

The Türkiye Emergency Road Rehabilitation and Reconstruction Project (the Project) has been planned to be prepared and implemented by General Directorate of Highways (KGM) under the Ministry of Transport and Infrastructure (MoTI) to ensure efficient execution and compliance with national regulations and Asian Infrastructure Investment Bank (AIIB) policies.

The Project will rehabilitate and reconstruct roads, tunnels, and bridges damaged by the February 2023 earthquakes that occurred in the southeast of Türkiye. The Project activities will be implemented through five (5) subprojects which will entail rehabilitation and enhancement of transportation infrastructure to meet required safety and capacity standards, as well as integration of climate-resilient measures to mitigate and withstand the impacts of seismic events in the future. The subprojects are located within the jurisdictions of the 5th Regional Directorate of Highways (Mersin) and 8th Regional Directorate of Highways (Elazığ).

The phased approach on environmental and social (E&S) assessment will be utilized for the proposed Project given the urgent need of assistance because of the earthquakes. In this context, a contract was signed between 5th Regional Directorate of Highways and Çınar Engineering Consultancy Inc. (ÇINAR) on 14.02.2024 for the preparation of Environmental and Social Documentation in accordance with the AIIB standards and national legislation.

1.1 Project Description

The Project will rehabilitate and reconstruct roads, tunnels, and bridges damaged by the February 2023 earthquakes that occurred in the southeast of Türkiye. The Project activities will be implemented through five (5) sub-projects which will entail rehabilitation and enhancement of transportation infrastructure to meet required safety and capacity standards, as well as integration of climate-resilient measures to mitigate and withstand the impacts of seismic events in the future.

The sub-projects are located within the jurisdictions of the 5th Regional Directorate of Highways (Mersin) and 8th Regional Directorate of Highways (Elazığ).

The Main Project summary information is provided in Table 1 and the sub-projects that are classified according to related Regional Directorates are given in Table 2.

Table 1. Project Summary Information

| | |
|----------------------------|---|
| Project Name | Türkiye Emergency Road Rehabilitation and Reconstruction Project |
| Project Number | P000848 |
| Sector/Subsector | Transport/Roads |
| Status of Financing | Under Preparation |
| Objective | To restore connectivity and enable safe and efficient movements of goods and people by rehabilitating essential transportation infrastructure located in the earthquake affected areas of Türkiye |
| E&S Category | Category B |



Table 2. Classification of the Sub-projects

| Responsible Regional Directorate | Subproject No. | Subproject Name | Province/ District |
|---|----------------|---|--|
| 5 th Regional Directorate (Mersin) | 1 | TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work | Gaziantep/ Nurdağı |
| | 2 | Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work | Hatay |
| | 3 | Antakya-Samandağ Road (Including Samandağ Crossing) Km: 0+000-26+850 Section Supply Construction Works | Hatay/ Samandağ |
| 8 th Regional Directorate (Elazığ) | 4 | (Malatya-Akçadağ) Junction - Gölbaşı Road (Construction Works of Erkenek Tunnel Damaged in Earthquake and Erkenek Tunnel-Karanlıkdere Section Damaged in Earthquake) | Malatya/ Doğanşehir Adıyaman/ Gölbaşı |
| | 5 | Repair of Technological Bridges Damaged in Earthquake (Tohma, Ağın, Beylerderesi Bridges Earthquake Damage Repair) | Malatya Elazığ |

Province and district information regarding the sub-projects is summarized in Table 2. The main project encompasses Hatay, Gaziantep, Malatya, Elazığ, and Adıyaman Provinces. A map presenting the locations of all sub-projects is provided in Figure 1.

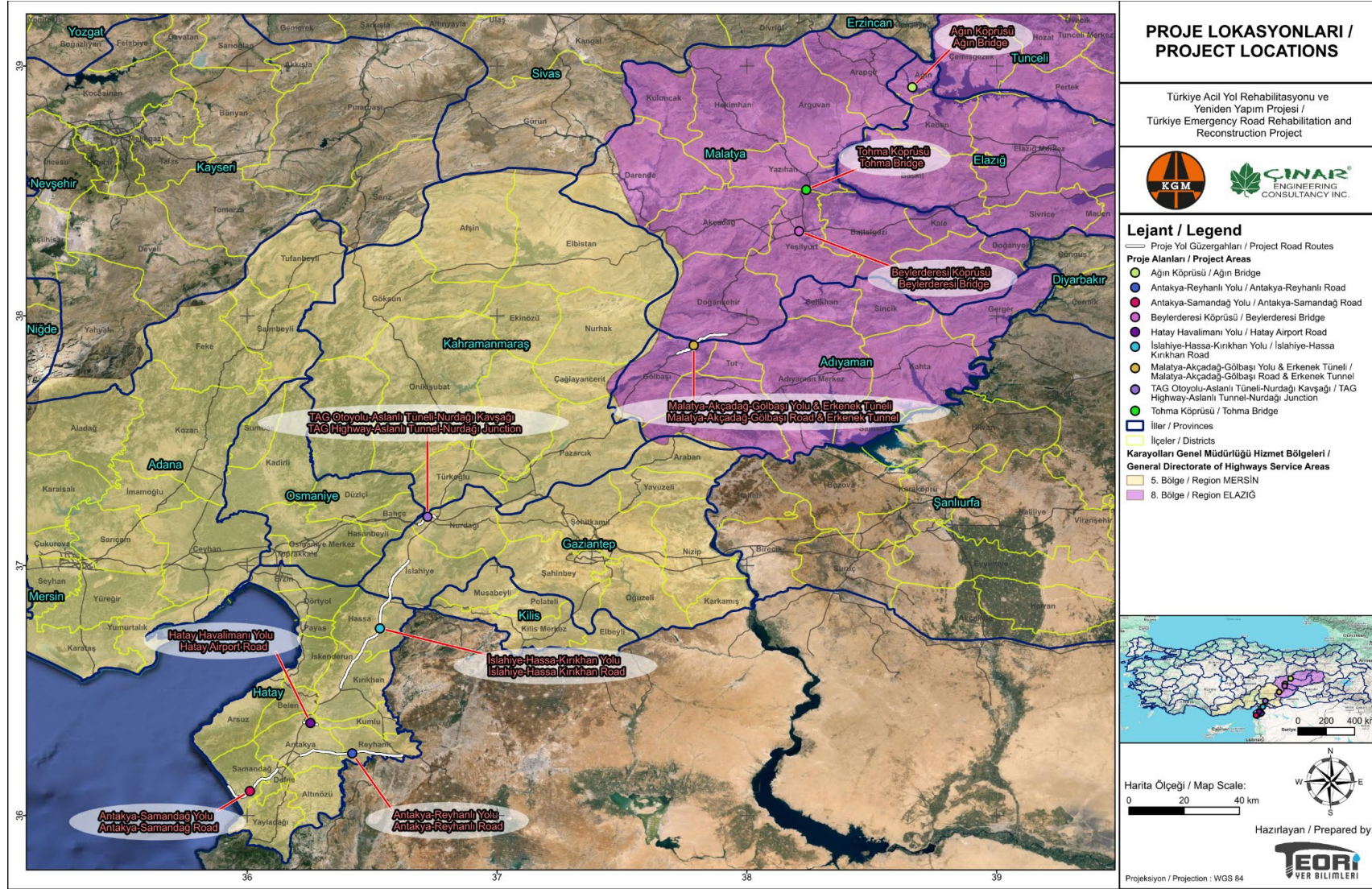


Figure 1. Project Locations Map



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 11 / 48 |

1.2 Scope and Objectives

The overall purpose of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information and consultations, throughout the Türkiye Emergency Road Rehabilitation and Reconstruction Project cycle.

The SEP outlines the ways the project team can communicate with stakeholders and includes a mechanism through which stakeholders can raise concerns, provide feedback or lodge complaints about project activities or any project-related activities.

This SEP establishes a systematic approach to stakeholder engagement that will help the Project identify stakeholders and establish and maintain constructive relationships with stakeholders in accordance with AIIB Environmental and Social Standard 1 (ESS1).

Throughout the project lifecycle, the stakeholder engagement process will follow the following key strategies to successfully manage social and environmental impacts.

- Within the scope of an open consultation approach with public participation, all notifications, verbal or written requests, complaints and suggestions from stakeholders will be carefully evaluated and necessary consultations will be held, without intervention, coercion or intimidation.
- Information regarding the project will be presented and explained to all stakeholders and parties in a format suitable for socio-cultural communication opportunities.
- The SEP, which was developed to define an effective stakeholder management approach appropriate to the characteristics and needs of sub-project activities and to identify stakeholders, also includes a Grievance Redress Mechanism (GRM) procedure.
- The SEP will support maintaining an inclusive approach throughout both stakeholder consultations and for the Project specific GRM. In line with this purpose, SEP defines the tools that will enable the participation of all stakeholder groups and Project-affected people (PAPs)¹. These efforts will include the development of alternative actions and communication tools, especially for the inclusion of women, persons with disabilities, the elderly, immigrant/refugee PAPs, workers and local communities. A proactive and functional communication approach will be adopted against the risk of exclusion of vulnerable groups from project opportunities, Grievance Redress Mechanism and stakeholder consultation processes.

Based on all these basic approaches, SEP was developed as a living document for the General Directorate of Highways (KGM) within the scope of the Türkiye Emergency Road Rehabilitation and Reconstruction Project. SEP will be implemented throughout the project and will be revised and updated when necessary.

Based on this general approach, the scope of SEP is as follows;

- Determining the legal framework of stakeholder engagement activities,
- Identifying stakeholders and developing a stakeholder map,
- Determining the policy that will form the framework of stakeholder participation,
- Determining the roles and responsibilities of human resources that will manage the stakeholder engagement process,
- Preparation of stakeholder consultation plan,
- Developing a Grievance Redress Mechanism,
- Determining the record keeping and reporting structure,
- Establishing a monitoring and reporting framework.

¹ People who may be beneficially or adversely affected by an AIIB-financed Project
<https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/rules/index.html>



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 12 / 48 |

2 LEGAL FRAMEWORK

2.1 National Legislation

2.1.1 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:

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.

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.

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.

2.1.2 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.

2.1.3 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 organizations, which qualify as public institutions.

2.1.4 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.



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 13 / 48 |

2.2 International Standards

2.2.1 AIIB's Environmental and Social Framework

AIIB is a multilateral financial institution, whose purpose, as set out in its Articles of Agreement (Articles), is to: (a) foster sustainable economic development, create wealth and improve infrastructure connectivity in Asia, by investing in infrastructure and other productive sectors; and (b) promote regional cooperation and partnership in addressing development challenges by working in close collaboration with other multilateral and bilateral development institutions.

The Articles require the AIIB's operations to comply with policies addressing environmental and social impacts, among other policies. The Environmental and Social Framework (ESF) incorporates AIIB's policy addressing environmental and social impacts. The ESF amended in November 2022, replaces the May 2021 ESF and entered into effect on November 22, 2022.

The Environmental and Social Policy (ESP) of AIIB comprises mandatory environmental and social requirements for each Project and is accompanied by (a) three associated mandatory Environmental and Social Standards (ESSs) setting out requirements applicable to Clients on; and (b) an Environmental and Social Exclusion List (ESEL) which sets forth activities and items that are excluded from financing by AIIB and that the Client is required to exclude from the Project.

The ESSs cover the following:

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

ESS 1 (Environmental and Social Assessment and Management): When the Bank, AIIB, has determined, in consultation with the Client, that the Project is likely to have adverse environmental and/or social risks and impacts, it requires the Client to conduct an environmental and social assessment relating to these risks and impacts, and design appropriate measures to avoid, minimize, mitigate, offset or compensate for them, all as required under ESS 1.

The objective of ESS 1 is to achieve the environmental and social soundness and sustainability of Projects and to support the integration of environmental and social considerations into the Project decision-making process and implementation.

ESS 1 applies if the Project is likely to have adverse environmental risks and impacts or social risks and impacts (or both). The scope of the environmental and social assessment and management measures are proportional to the risks and impacts of the Project. ESS 1 provides both for quality environmental and social assessment and for management of risks and impacts through effective mitigation and monitoring measures during the course of Project implementation.

ESS 2 (Land Acquisition and Involuntary Resettlement): If the Project is likely to involve Involuntary Resettlement the Bank requires the Client to address this in the social section of the assessment report, complemented by more in-depth coverage, as required under ESS 2. The Client covers this in a plan or framework, as applicable, which may be called a land acquisition and resettlement plan, land acquisition plan or resettlement plan (LARP/LAP/RP) or, in the case of a framework, a land acquisition and resettlement planning framework, land acquisition planning framework or resettlement planning framework (LARPF/LAPF/RPF). This plan or framework is provided to the Bank as a freestanding document, an annex to the assessment report, or incorporated as a recognizable element of the report.



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 14 / 48 |

The objectives of ESS 2 are: (a) to avoid Involuntary Resettlement wherever feasible; (b) to minimize Involuntary Resettlement by exploring Project alternatives; (c) where avoidance of Involuntary Resettlement is not feasible, to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-Project levels and to provide resettlement assistance; (d) to understand and address gender-related risks and differential impacts of Involuntary Resettlement; (e) to improve the overall socioeconomic status of the displaced poor and other vulnerable groups; and (f) to conceive and implement resettlement activities as sustainable development programs, providing sufficient resources to enable the persons displaced by the Project to share in Project benefits.

ESS 2 applies if the Project would or may involve Involuntary Resettlement (including Involuntary Resettlement of the past or foreseeable future that the Bank determines is directly linked to the Project).

ESS 3 is not applicable for the Projects in Türkiye, since there is no communities or groups of people which can be identified/defined as indigenous peoples in the country.



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 15 / 48 |

3 ROLES AND RESPONSIBILITIES

The ESMP including SEP and GRM will be implemented with an adaptive management approach to respond to changes occurring at different stages of the Project and, as a living document, will be updated to reflect the current status of the Project and site features and management requirements when necessary. KGM and the contractor is obliged to implement the SEP with adequate and qualified personnel working under an appropriate organizational structure, in line with Project standards, in line with stakeholder participation and information sharing requirements, and to ensure that contractor/subcontractor(s) adopt management controls.

3.1 Organizational Structure

KGM is a public institution affiliated to the MoTI with a special budget for finance. KGM has a range of responsibilities related to the planning, construction, maintenance, and management of the country's road infrastructure KGM's duties are summarized below.

- **Planning and development of highways:** KGM is responsible for developing plans and strategies for the construction and expansion of Türkiye's highway network.
- **Construction and maintenance of highways:** KGM oversees the construction, maintenance, and repair of highways throughout Türkiye, including both urban and rural areas.
- **Traffic management:** KGM is involved in managing traffic flow, implementing safety measures, and improving transportation efficiency on highways.
- **Road safety:** KGM works to improve road safety by implementing measures such as signage, speed limits, and traffic enforcement.
- **Environmental protection:** KGM considers environmental factors in highway construction and maintenance projects to minimize their impact on the environment.
- **Coordination with other agencies:** KGM collaborates with other government agencies, local authorities, and private sector entities involved in transportation and infrastructure development.

Headquarter in Ankara, KGM operates through a network of 18 Regional Directorates strategically located throughout the country.

KGM serves as the implementing agency for the Project, operating through its central offices in Ankara and two of its Regional Directorates (5th and 8th). Subprojects are being implemented and supervised by the Regional Directorate responsible for the area where they are located.

The project will have one PIU in Ankara and two RIUs within Regional Directorates 5 and 8. The PIU will primarily coordinate project preparation and implementation, while the RIUs will manage day-to-day activities, procurement, supervision, and monitoring specific to their respective subprojects. PIU established within KGM consists of the Project Director, PIU Head, Environmental and Social Specialist(s), Procurement Specialist, Financial Management (FM) Specialist, Technical Specialist and Monitoring and Evaluation (M&E) Specialist along with two RIUs. PIU and each RIU have E&S staff to be able to manage effective implementation of the project. Within the scope of this sub-project, the key local authorities are KGM 8th Regional Directorate (Elazığ) and KGM 5th Regional Directorate (Mersin), which operate under KGM as a regional organization.

Organizational structure defined in Figure 2.



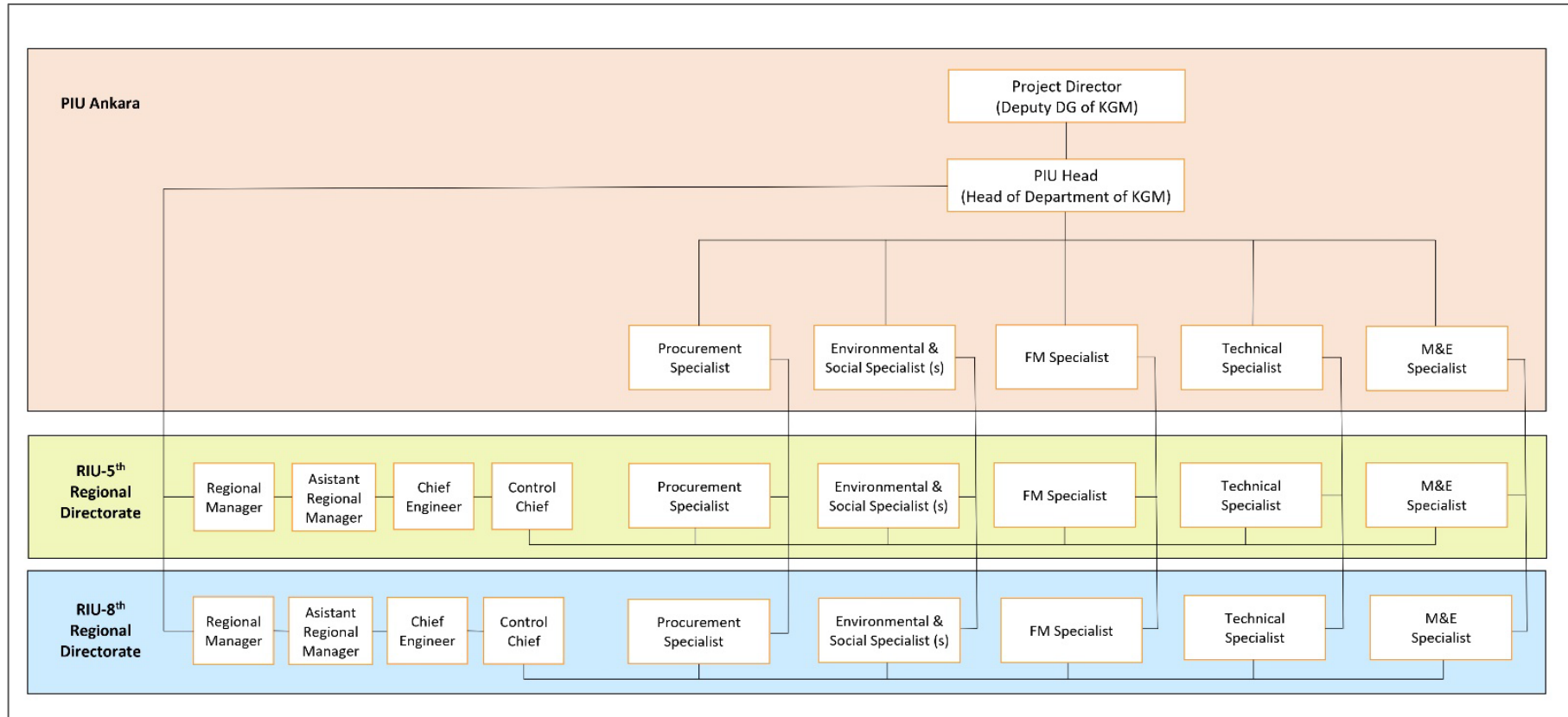


Figure 2. ESMS Organizational Structure



3.2 Roles and Responsibilities

As the project owner, it is the responsibility of KGM to manage the environmental and social issues of the project and to ensure that the necessary mechanisms are developed and implemented by the Contractor.

The roles and responsibilities for managing the SEP and the Grievance Redress Mechanism (GRM) are presented in Table 3.

Table 3. Roles and Responsibilities Regarding the Implementation of the SEP&GRM

| |
|---|
| KGM PIU |
| <p><u>Project Director and PIU Head</u></p> <ul style="list-style-type: none"> ▪ Responsible for the overall coordination and management of the project or program at the central level. ▪ Ensuring effective implementation of ESMP and related E&S sub-management plans including SEP along with fulfillment of all commitments within the scope of ESMP and SEP. ▪ Sharing the ESMP and SEP with the Contractor by incorporating it into the civil work contract, guiding the Contractor in preparing the implementation plans, approving these plans. ▪ Periodic reporting (determined as semi-annually) to the Bank regarding the implementation of the SEP. ▪ Employment of competent EHS staff and/or external experts to work under the project. ▪ Coordination of the actions and assessments if a change due to engineering/design changes, route/location changes, applicable legislation changes related to environmental and social issues, authority provision changes, any new environmental/social data is introduced, construction/operation strategy changes or stakeholders influence the project. <p><u>Environmental, Social and M&E Specialists</u></p> <ul style="list-style-type: none"> ▪ Providing EHS trainings (including training on ESMP, SEP and GRM) to related Project staff, ▪ Providing the disclosure of the SEP and GRM to stakeholders ▪ Ensuring that the relevant trainings provided to the Contractor workers on Project workers GRM. ▪ Review, monitoring and audits related to SEP practices, evaluation of the results. ▪ Auditing contractor activities in line with SEP requirements. ▪ Ensure that the GRM is managed in accordance with the GRM procedure. ▪ Monitoring and reporting the GRM quarterly for AIIB. ▪ Ensuring compliance with the project standards, getting contractor to make necessary emergency corrections in case of non-compliance. ▪ Ensuring stakeholder participation, implementing the Grievance Redress Mechanism, ensuring continuous information transfer through open communication. |
| RIU |
| <ul style="list-style-type: none"> ▪ Responsible for implementing project activities at the regional or local level according to the guidelines and instructions provided by the central PIU. ▪ Ensuring implementation of the SEP and GRM along with fulfillment of all commitments within the scope of SEP. ▪ Engagement with local stakeholders, including communities, government authorities, and NGOs, to ensure effective project implementation and address local concerns. ▪ Identifying and addressing implementation challenges and bottlenecks at the regional level, working collaboratively with the Central PIU and other stakeholders to find solutions. |
| Supervision Consultant |
| <ul style="list-style-type: none"> ▪ Supervision of construction and/or rehabilitation works and installation of equipment, ▪ Monitoring and evaluating the performance of the services provided by the Contractor, ▪ Identification and management of risks and impacts related to environmental, social and OHS issues, ▪ Ensuring initiation of corrective actions where necessary, ensuring implementation of mitigation measures by the contractor, ▪ Follow up and audit the contractor's activities periodically in line with the measures and commitments given in the ESMP and other related sub-plans including SEP&GM. ▪ Periodic monitoring and reporting to the KGM PIU/RIU regarding the implementation of the ESMP, SEP&GM. |



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 18 / 48 |

Contractor

- Fulfillment of all requirements of the ESMP and related E&S sub-management plans including SEP&GM.
- Implementation of additional commitments determined by KGM and/or AIIB.
- Developing its own site-specific Construction ESMP including relevant E&S sub-management plans.
- By appointing a person responsible for SEP and GRM, ensuring SEP&GM management under the responsibility of this appointed person
- Ensuring compliance with project standards, obtaining all relevant permits and licenses.
- Monitoring construction activities (including subcontractor activities, if any) and taking measures within the scope of the ESMP and implementing SEP actions.
- Development of implementation and monitoring plans / procedures in line with the ESMP structure, implementation after the approval of KGM.
- Employment of competent EHS staff within the scope of the project.
- Providing the necessary trainings to all project staff including sub-contractor staff on environmental, social and occupational health and safety issues, SEP and GRM.
- Carrying out monthly monitoring by the person responsible for SEP&GM and providing monthly and quarterly monitoring reporting of the Grievance Redress Mechanism to KGM.
- Providing training to all employees on SEP&GM and GBVH complaints
- Ensuring that the tools defined for the employee complaint mechanism are operational and working, developing the necessary complaint mechanism tools (complaint boxes, poster notifications, etc.)



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 19 / 48 |

4 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

This SEP was developed in early stages of the Project. At this early stage of the preliminary study, institutional consultations that played a role in the development of the Project were held within the scope of stakeholder consultations. As a result of written consultations with the following stakeholders, their institutional opinions were received.

- Ministry of Culture and Tourism (MoCT)
- MoCT, General Directorate of Investment and Enterprises, General Directorate of Cultural Heritage and Museums (GDCHM)
- Ministry of Energy and Natural Resources (MoENR), Petroleum Pipeline Corporation (BOTAŞ)
- BOTAŞ Akdeniz Operation Directorate
- BOTAŞ, Natural Gas Transmission III. Regional Directorate
- NATO Oil Pipeline
- Ministry of Agriculture and Forestry (MoAF), 7th Regional Directorate
- MoAF, 3rd Regional Directorate
- MoAF, 15th Regional Directorate
- Hatay Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)
- Malatya Governorship PDoEUCC
- Elazığ Governorship PDoEUCC
- Adiyaman Governorship PDoEUCC
- Hatay Governorship, Provincial Directorate of Culture and Tourism (PDoCT),
- Gaziantep Governorship PDoCT
- Adiyaman Governorship, PDoCT
- Elazığ Governorship, PDoCT, Cultural Affairs Branch Directorate
- Hatay Cultural Heritage Preservation Regional Board Directorate (CHPRBD)
- Gaziantep CHPRBD
- Hatay CHPRBD
- Adana Cultural and Natural Heritage Preservation Regional Board (CNHPRP)
- Hatay Airport
- Hatay Governorship Provincial Directorate of Agriculture and Forestry (PDoAF)
- Malatya Governorship PDoAF
- Elazığ Governorship PDoAF

Along with the stakeholders listed above who were consulted in the early stages of the Project, all other Project stakeholders identified and identified within the Project Aol are also included within this SEP as part of the Project Stakeholder engagement process.

In accordance with the written opinions received from the institutions, feedback has been received that the project activities will not cause any negative impacts within the Project area of influence.

In the field research carried out to develop the ESDD report of the project, social assessments, observations, preliminary examinations and visits to construction sites were made on the routes of all Sub-Projects and the current situation determinations were reported. Based on these preliminary studies and scans, areas, settlements and locations where the effects of the Project may emerge have been identified. These identified areas were included in the field study carried out for the second time.

Within the scope of the second field studies carried out for ESIA, SEP and ESMP, interviews were held with fish farms and recreational facilities located in the Project impact area, household surveys and Mukhtar interviews were carried out, and construction sites were visited. Details of the stakeholder engagements are presented in Table 4.



| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
|-----------------------------|-----------------|------------------------|
| Final | Date: June 2024 | Page 20 / 48 |

Table 4. Stakeholder Engagements During ESIA&ESMP Development Studies

| Sub-project No | Sub-project | Province/ District | Mukhtar interviews held | Household surveys held | Stakeholder interviews with workplaces | Visited construction sites |
|----------------|---|---------------------------------------|------------------------------|------------------------|---|---|
| 1 | TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work | Gaziantep/ Nurdağı | Başpınar | 3 | - | SNH Construction Ceyhan Construction Site and Accommodation Area 5 th Regional Directorate of Highways guest house (Bahçe Accommodation Area) |
| | | | Arıcaklı | - | | |
| | | | Bademli | - | | |
| 2 | Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work | Hatay | Muratpaşa | - | - | FEZA Construction Kızılkaya Construction Site and Accommodation Area DEHA Construction Kuruyer Construction Site and Accommodation Area |
| | | | Narlıca Kuruyer | 2 | | |
| | | | Değirmencik (Islahiye) | - | | |
| | | | Demirköprü | 3 | | |
| | | | Alaattin | 2 | | |
| | | | Üzümdalı | - | | |
| | | | Ardıçlı | 7 | | |
| | | | Demrek/Deliçay | 7 | | |
| | | | Aşağıoba | 5 | | |
| | | | Paşaköy | 4 | | |
| | | | Madenboyu | 4 | | |
| Konuk | 4 | | | | | |
| 3 | Antakya-Samandağ Road (Including Samandağ Crossing) Km: 0+000-26+850 Section Supply Construction Works | Hatay/ Samandağ | Mağaracık | - | - | - |
| | | | Kurtderesi veya Yeni Mahalle | - | | |
| | | | Sutaşı/ Defne | 2 | | |
| | | | Ataköy | 2 | | |
| | | | Uzunbağ | 3 | | |
| 4 | (Malatya-Akçadağ) Junction - Gölbaşı Road (Construction Works of Erkenek Tunnel Damaged in Earthquake and Erkenek Tunnel- | Malatya/ Doğanşehir Adıyaman/ Gölbaşı | Karanlıkdere | - | Workplace interviews were held with the following 3 | - |



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 21 / 48 |

| Sub-project No | Sub-project | Province/ District | Mukhtar interviews held | Household surveys held | Stakeholder interviews with workplaces | Visited construction sites |
|----------------|--|--------------------|-------------------------|------------------------|---|---|
| | Karanlıkdere Section Damaged in Earthquake) | | | | recreational facilities: Hakan's Place Uncle Halil's Place Blue Moon | |
| 5 | Repair of Technological Bridges Damaged in Earthquake (Tohma, Ağın, Beylerderesi Bridges Earthquake Damage Repair) | Malatya Elazığ | Tohma Durucasu | - | Network fishing business meeting | Enkon Construction A.Ş. (ENKON) Tohma Camping Area |
| | | | Yakınca (Yeşilyurt) | - | - | Camping area right next to the Ağın Bridge (established by the company "Freysaş") |

During the interviews, opinions were received that since the Project continues mainly on the road route, there is no negative impact outside the route and that there is no negative impact on livelihoods and workplaces. The outlook for the project is positive. In addition, stakeholders' suggestions and opinions regarding the measures to be taken against potential risks and impacts and stakeholder consultation methods were received and these feedbacks were evaluated and reported in the relevant plans.



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|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 22 / 48 |

5 STAKEHOLDER IDENTIFICATION

5.1 Methodology of the Identification

Stakeholder analysis was carried out as early as possible in the project life cycle, taking into account the dynamics between stakeholders and the risks and opportunities of their participation in the Project.

The purposes of the analyses can be defined as follows;

- To categorize stakeholders according to their level of influence and interest in the project/subprojects,
- Taking into account how each stakeholder group (vulnerable groups, individuals, organizations, government institutions, etc.) will be affected by the project and how it will affect the Project, ensuring their meaningful participation in the Project through timely information, participatory consultations,
- To ensure that the Grievance Redress Mechanism tools to be developed together with the SEP, are appropriate and accessible for the stakeholder groups,
- To support the management of the environmental and social impacts of the project by establishing healthy stakeholder relationships.

Identification of project stakeholders and determination of consultation methods with identified stakeholders is the first step in Stakeholder identification.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- Affected Parties are persons, groups and other entities within the Project Area of Influence (AoI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- Other Interested Parties are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- Vulnerable Groups who may be disproportionately impacted or further disadvantaged by the Project as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

5.2 Project Area of Influence

The social AoI of the Project has been determined by taking into account the direct and indirect effects of the Project, and in addition to the settlements that may be exposed to negative effects that may arise from the construction and operation activities of the Project, the settlements that may be positively affected by local employment and local purchasing opportunities have also been defined within the scope of the AoI.

This AoI includes the area likely to be affected by:

- The Project activities and facilities that are directly owned, operated, or managed (including by contractors) and that are a component of the project;
- Impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or



- Indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.

Therefore, in the light of the above explanations, the Project Area of Influence is defined in the following order;

- Directly Project activities impacted area which is defined as the foot-print of the Project,
- The area where direct environmental, social and economic impacts are spread as a result of the activities of the project,
- The broad area over which Project impacts and benefits are spread that may be affected by the results of the Project.

Based on this approach, the Project Area of Influence diagram is shown in Figure 3.

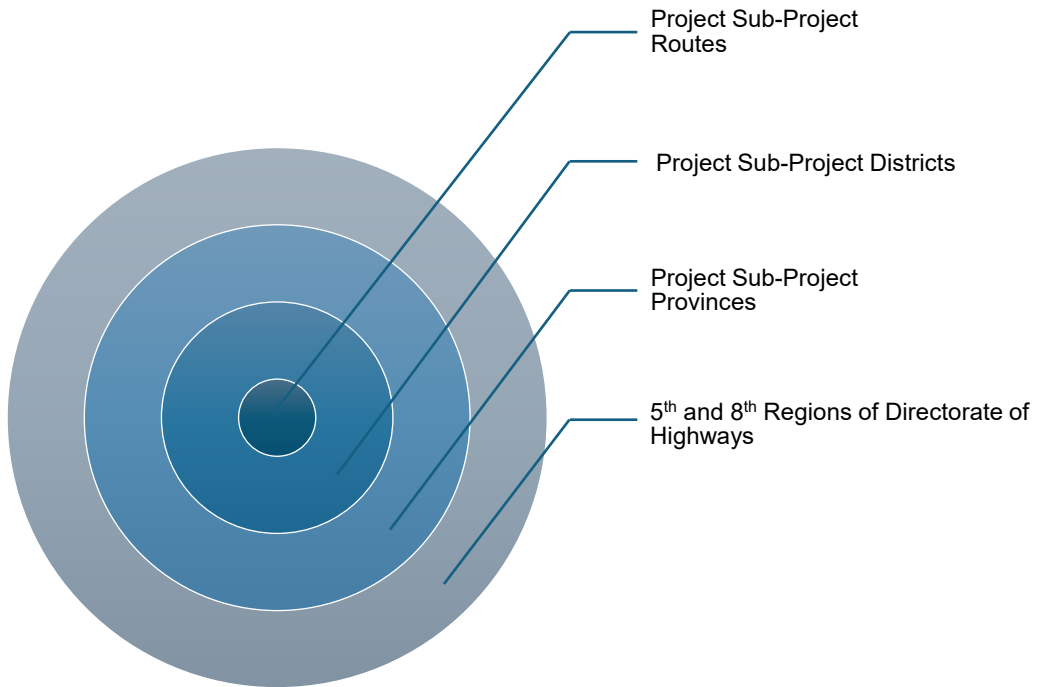


Figure 3. Project Aol Diagram

According to the Aol determination identification, Project Aol location in Türkiye is shown in Figure 4.



Figure 4. Project Aol location in Türkiye

District and Provinces located in the Project Aol are shown in Table 5.

Table 5. Project Aol Settlements and Region

| Responsible Regional Directorate | Subproject No. | District Level | Province Level |
|---|----------------|---|---------------------|
| 5 th Regional Directorate (Mersin) | 1 | Nurdağı | Gaziantep |
| | 2 | Islahiye Hassa Kırıkhan Reyhanlı | Hatay |
| | 3 | Samandağ Antakya | Hatay |
| 8 th Regional Directorate (Elazığ) | 4 | Doğanşehir Gölbaşı Akçadağ | Malatya Adıyaman |
| | 5 | Darende Ağın | Malatya Elazığ |

5.3 Stakeholders

5.3.1 Affected Parties and Other Interested Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups are defined within this category:

- Local settlements and Mukhtars
- PAPs
- Municipalities
- Local Businesses

The projects' stakeholders also include interested parties other than the directly affected communities, including;

- Central and provincial governmental agencies
- Municipalities
- NGO's and organizations
- Academics
- Vulnerable/ Disadvantaged Individuals or Groups

Stakeholders of the Project including affected parties, other interested parties and vulnerable groups of the Project are given in Table 6.

Table 6. Stakeholders of the Project

| Stakeholder Groups | Stakeholders | Affected Parties | | Other Interested Parties |
|------------------------------|--|---------------------|-----------------------|--------------------------|
| | | Direct Stakeholders | Indirect Stakeholders | |
| Internal Stakeholders | General Directorate of Highways (KGM) 5th Regional Directorate of Highways 8th Regional Directorate of Highways Employees, Contractors and Workers | x | | |
| Governmental agencies | Ministry of Culture and Tourism (MoCT), General Directorate of Investment and Enterprises, General Directorate of Cultural Heritage and Museums (GDCHM), Ministry of Energy and Natural Resources (MoENR), Petroleum Pipeline Corporation (BOTAŞ), BOTAS Akdeniz Operation Directorate BOTAS, Natural Gas Transmission III. Regional Directorate NATO Oil Pipeline Ministry of Agriculture and Forestry (MoAF), 7th Regional Directorate MoAF, 3rd Regional Directorate MoAF, 15th Regional Directorate Hatay Governorship Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC) Malatya Governorship PDoEUCC Elazığ Governorship PDoEUCC Adiyaman Governorship PDoEUCC | | | x |

| Stakeholder Groups | Stakeholders | Affected Parties | | Other Interested Parties | | | | | | |
|---|--|---------------------|-----------------------|--|---|---|--|--|--|--|
| | | Direct Stakeholders | Indirect Stakeholders | | | | | | | |
| | Hatay Governorship, Provincial Directorate of Culture and Tourism (PDoCT), Gaziantep Governorship PDoCT Adiyaman Governorship, PDoCT Elazığ Governorship, PDoCT, Cultural Affairs Branch Directorate Hatay Cultural Heritage Preservation Regional Board Directorate (CHPRBD) Gaziantep CHPRBD Hatay CHPRBD Adana Cultural and Natural Heritage Preservation Regional Board (CNHPRP) Hatay Airport Hatay Governorship Provincial Directorate of Agriculture and Forestry (PDoAF) Malatya Governorship PDoAF Elazığ Governorship PDoAF | | | | | | | | | |
| PAPs | Communities living in the neighborhood settlements of the sub-project routes Mukhtars of the settlements | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Sub-Project</th> <th>Settlements</th> </tr> </thead> <tbody> <tr> <td> P1: TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work </td> <td> Kızlaç Olucak Kurudere Başpınar Bademli </td> </tr> <tr> <td> P2: Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work </td> <td> Narlıca Ilıca Üzümdalı Madenboyu Demirköprü Meekli Telakrat Vazvaza Kötübüyük Sıçanlı Behlile Akserçayırı Bayır Yenişehir Harran İbrahimpasha Osmanağa </td> </tr> </tbody> </table> | Sub-Project | Settlements | P1: TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work | Kızlaç Olucak Kurudere Başpınar Bademli | P2: Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work | Narlıca Ilıca Üzümdalı Madenboyu Demirköprü Meekli Telakrat Vazvaza Kötübüyük Sıçanlı Behlile Akserçayırı Bayır Yenişehir Harran İbrahimpasha Osmanağa | | | |
| | Sub-Project | Settlements | | | | | | | | |
| P1: TAG Highway Aslanlı Tunnel (Km:214+490)-Nurdağı Junction (Km: 223+115) Section, Repair of All Kinds of Damages and Strengthening of Viaducts Against Earthquakes in This Section Construction Work | Kızlaç Olucak Kurudere Başpınar Bademli | | | | | | | | | |
| P2: Islahiye-Hassa-Kırıkhan Road (Km:24+500-84+500), Antakya-Reyhanlı Road (Km:0+000-42+500) Hot Bituminous Mixture Repair Work, Hatay Airport Road Soil Works, Art Structures and Superstructure Construction Work | Narlıca Ilıca Üzümdalı Madenboyu Demirköprü Meekli Telakrat Vazvaza Kötübüyük Sıçanlı Behlile Akserçayırı Bayır Yenişehir Harran İbrahimpasha Osmanağa | | | | | | | | | |
| | | x | | | | | | | | |

| Stakeholder Groups | Stakeholders | Affected Parties | | Other Interested Parties |
|--------------------|---|---|-----------------------|--------------------------|
| | | Direct Stakeholders | Indirect Stakeholders | |
| | <p>Paşaköy Arpadan Amik Ovası Ahrazlı Alaybeyli Ilıkpınar Karamağara Karaçağlı Güzelce Saylak Bektaşlı Demrek Yuvalı Küreci Eğribucak Ardıçlı Aşağıkarafakılı Girne Dervişpaşa Tiyek Akbez Salmanuşağı Sapanözü Esenler Dolan Sulumağara Aydınoğlu Kerküt Değirmencik Kırıkçalı Fevzipaşa Cevdetpaşa Bahçelievler</p> | | | |
| | <p>P3: Antakya-Samandağ Road (Including Samandağ Crossing) Km: 0+000-26+850 Section Supply Construction Works</p> | <p>Kapısuyu Mağaracık Kurtderesi Deniz Çiğdede Yeni Atatürk Sutaşı Kuşalanı Koyunoğlu Yeşilköy Değirmenbaşı Uzunbağ Karaçay Defne Hancağız Tavla</p> | | |

| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 28 / 48 |

| Stakeholder Groups | Stakeholders | | Affected Parties | | Other Interested Parties |
|--------------------------------|--|--|---------------------|-----------------------|--------------------------|
| | | | Direct Stakeholders | Indirect Stakeholders | |
| | | Koçören Meydancık Güney Söğüt Subaşı | | | |
| | P4: (Malatya-Akçadağ) Junction - Gölbası Road (Construction Works of Erkenek Tunnel Damaged in Earthquake and Erkenek Tunnel-Karanlıkdere Section Damaged in Earthquake) | Hürriyet Karanlıkdere Kınalıtaş Harmanlı/Yeni Harmanlı Cumhuriyet Canlara Karabahşılı | | | |
| | P5: Repair of Technological Bridges Damaged in Earthquake (Tohma, Ağın, Beylerderesi Bridges Earthquake Damage Repair) | Sütlüce Sürür Durucasu Yakınca Cevatpaşa Yedibağ Akpınar | | | |
| Municipalities | Metropolitan Municipalities of the affected Provinces: Gaziantep Hatay Malatya Adıyaman Malatya Elazığ | | | | x |
| | Municipalities of the affected districts: Nurdağı Islahiye Hassa Kırıkhan Reyhanlı Samandağ Antakya Doğanşehir Gölbası Akçadağ Darende Ağın | | | x | |
| NGO's and organizations | Turkish Drivers and Automobile Association International Transporters Association Interested national NGOs Interested international NGOs Local logistics and transporters associations | | | | x |



| Stakeholder Groups | Stakeholders | Affected Parties | | Other Interested Parties |
|--|---|---------------------|-----------------------|--------------------------|
| | | Direct Stakeholders | Indirect Stakeholders | |
| Local sector | Service or Good Providers Local businesses Chamber of Tradesmen and Craftsmen | | | x |
| Academics | Universities Institutes | | | x |
| Vulnerable/ Disadvantaged Individuals or Groups | People with physical or mental disabilities PAPs with chronic diseases or bedridden people Female heads of households Poor people living on government or association aid within Project Aol Elderly people in need of care and social assistance Unemployed (even though they are looking for a job) People who are homebound due to chronic illness Illiterate adults Earthquake victims Refugees, migrants, citizens with limited Turkish language abilities Villagers who do not own land and work on other people's lands as daily wage earners. | x | | |
| Media including social media | Regional and local media | | | x |

5.3.2 Vulnerable Groups

During the stakeholder identification process, one of the most important processes is the identification of the vulnerable groups who may be differently or disproportionately affected by the Project or may have difficulty participating in participation and development processes.

Environmental and social field surveys to develop the ESIA & ESMP documents of the Project were carried out in March 2024. Within the scope of these field studies, vulnerable groups in the Project impact area were identified through stakeholder interviews, surveys conducted with the Mukhtars of the Project-affected settlements and affected PAPs.

Evaluations regarding the distribution of Vulnerable Groups in the Project impact area are presented under the 4.8.2 Baseline Conditions section in the Environmental and Social Impact Assessment Report (CNR-KGM-TERRRP-ESIA-001) prepared for the Project.

- People with physical or mental disabilities
- PAPs with chronic diseases or bedridden people
- Female heads of households
- Poor people living on government or association aid within Project Aol
- Elderly people in need of care and social assistance
- Unemployed (even though they are looking for a job)
- People who are homebound due to chronic illness
- Illiterate adults

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|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 30 / 48 |

- Earthquake victims
- Refugees, migrants, citizens with limited Turkish language abilities
- Villagers who do not own land and work on other people's lands as daily wage earners.

6 STAKEHOLDER ENGAGEMENT PROGRAM

Due to the urgency of the project, the consultations during the project preparation phase were conducted with the officials of the relevant ministries/state units and provincial-district directorates.

This SEP will be consulted before finalized with the Project affected stakeholders through the disclosure meetings.

The SEP will be continuously (at least biannually) reviewed and updated as needed throughout the project lifecycle.

6.1 Information Disclosure

Project stakeholder engagement will be carried out in accordance with national legislation and AIIB ESS1.

KGM will ensure the participation of all affected parties, including internal and external stakeholders such as KGM employees and contractors and their employees, institutions and organizations, NGOs, local institutions and municipalities, vulnerable groups, PAPs.

Project stakeholders will be informed about the Project through timely and meaningful consultations.

Stakeholder engagement will continue throughout the implementation and operation phases.

Stakeholders will be kept informed of the progress of the Project, receive feedback on the effectiveness of mitigation and recovery measures, and have the opportunity to raise concerns or complaints regarding (but not limited to):

1. Impacts identified as a result of the project
2. Mitigation measures
3. Implementation schedule
4. Roles and responsibilities
5. Monitoring and management measures
6. The project's Grievance Redress Mechanism

To ensure effective stakeholder participation, the SEP will be reviewed every six (6) months by Social Specialist at PIU working at KGM throughout the life of the Project.

A variety of engagement techniques will be used to engage and consult with stakeholders, as well as to collect and communicate information from stakeholders.

The needs and concerns of stakeholders, as well as the level of influence, will determine the basis for the communication tools and methods chosen to engage specific groups.

The language of communication with stakeholders throughout the project will be Turkish. However, if necessary, different languages will be taken into account in order to increase the effectiveness of participation activities and ensure the participation of all stakeholder groups.

Engagement activities will continue to ensure meaningful participation and stakeholders will be provided with timely and effective information for this purpose.



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|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 31 / 48 |

The tools and methods defined for stakeholder participation have been developed to implement sustainable stakeholder participation in accordance with the cultural, social and economic conditions of all stakeholders, and will be diversified when necessary.

Consultations, information activities and meetings with stakeholder groups will be held in accordance with the stakeholders' interest and influence in the Project.

Disclosure meetings will be held for the stakeholder engagement plan and Grievance Redress Mechanism. Also, ESIA package (ESMPs, RP, GAP) will be disclosed on Project's website².

6.2 Methods and Tools of Stakeholder Engagement and GRM

The project's methods and tools for stakeholder engagement are described below, including the consultation tools currently used by KGM. These methods and tools will also be actively used within the scope of the Grievance Redress Mechanism which is identified under Section 7.

KGM Websites: The websites given below will be active tools in the stakeholder engagement process and GRM throughout the life of the Project.

- KGM Website: <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx>
- Project Website: <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/DiskrediliProjeler.aspx>

E-mail address to external stakeholders: Project authorized persons can reach stakeholders via e-mail addresses in order to reach stakeholders and/or provide feedback.

- KGM e-mail: info@kgm.gov.tr
- 5. Regional Directorate e-mail: bol05@kgm.gov.tr
- 8. Regional Directorate e-mail: bol08@kgm.gov.tr
- Project e-mail: diskrediliprojeler@kgm.gov.tr

Online meetings: Consultation and information sharing meetings will be held with key stakeholders.

Online interviews can also be used for the application of research techniques such as in-depth interviews, surveys, focus group meetings to monitor and evaluate, obtain information and collect data, if needed. Records can be taken at these meetings, if deemed necessary and with the consent of all stakeholders.

Grievance Redress Mechanism: The grievance redress mechanism, which will include the operation of the process where the notifications, records, information and complaints of the stakeholders will be kept, the complaints will be evaluated and monitored and the results will be communicated to the stakeholders with the feedbacks, is an important stakeholder engagement management tool and method to be used throughout the project.

Alternative Tools: The following tools and methods are planned to be used simultaneously in order to ensure stakeholder participation of vulnerable/disadvantaged individuals/groups such as illiterate population, people with disabilities and refugee groups who do not have access to the internet, smart phones, social media or e-mail.

Letter/post: Project brochures (including project information, grievance redress mechanism, etc.), postings, reports or announcements can be sent to disadvantaged or vulnerable groups or individuals who do not have access to the internet, smartphone, social media or e-mail.

² <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/DiskrediliProjeler.aspx>



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 32 / 48 |

Public boards: Announcements and information posters of communication channels related to the Project can be used in common public areas in surrounding settlements, mukhtar offices, municipalities.

Posters/brochures/flyers: Brochures/flyers with communication channels, announcements and information about the Project can be posted in the common public areas in the surrounding settlements, headman's offices, municipalities, provincial directorates, when necessary.

Local media: Announcements will be made in the printed and visual media at the stages and situations required by the Project.

Stakeholder visits: Face-to-face meetings will be held with stakeholders during the project process, and stakeholder visits will be made when necessary for monitoring and evaluation processes.

Consultation meetings: Consultation meetings can be held during the project process when needed and when stakeholders demand. Meetings will be held in places and places that will facilitate the participation of stakeholders.



6.3 Stakeholder Engagement Program

Information sharing and consultation issues, participation methods and implementation tools foreseen for the stakeholders of the project are presented in Table 7.

Table 7. Stakeholder Engagement Program

| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|---|--|--|---|--|--|------------------|
| Project preparation and construction | Preparation of the E&S instruments for the Project: <ul style="list-style-type: none"> ▪ ESIA ▪ SEP including Grievance Redress Mechanism (GRM) ▪ ESMP ▪ Resettlement Plan (RP) ▪ Gender Action Plan (GAP) | Affected parties: <ul style="list-style-type: none"> ▪ Governmental bodies ▪ Local Governmental bodies ▪ Local institutions ▪ The PAPs affected by land acquisition ▪ Communities living in the neighborhood settlements of the sub-project routes ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ E-mail to external stakeholders ▪ Official correspondences ▪ Online meetings ▪ Stakeholder visits ▪ Consultation meetings | Within the first three months of the project start | At the beginning of the Project | KGM |
| | Disclosure of the project information along with the E&S safeguard plans instruments <ul style="list-style-type: none"> ▪ ESIA ▪ ESMP ▪ SEP ▪ Grievance Redress Mechanism | <ul style="list-style-type: none"> ▪ All stakeholders ▪ The PAPs affected by land acquisition ▪ Communities living in the neighborhood settlements of the sub-project routes ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ KGM Websites ▪ E-mail to external stakeholders ▪ Online meetings ▪ Online interviews ▪ Letter/post ▪ Stakeholder visits ▪ Consultation meetings | Once plans are approved | At the beginning of the Project following the plans are approved | KGM |



| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|---------------|--|--|---|--|--|-------------------|
| | | <ul style="list-style-type: none"> Vulnerable/disadvantaged individuals/ groups | <ul style="list-style-type: none"> Stakeholder visits Consultation meetings | Once plans are approved | At the beginning of the Project following the plans are approved | KGM |
| | | <ul style="list-style-type: none"> KGM employees Contractors' workers | <ul style="list-style-type: none"> KGM Websites Online meetings Face to face meetings Posters/ brochures/ flyers Consultation meetings | Once plans are approved | At the beginning of the Project following the plans are approved | KGM Contractor |
| | Disclosure of the RP | <ul style="list-style-type: none"> PAPs affected by land acquisition | <ul style="list-style-type: none"> Consultation meetings KGM websites GRM | Once plans is approved | At the beginning of the Project following the plans are approved | KGM |
| | Community health and safety information meetings for local residents | <ul style="list-style-type: none"> Vulnerable/disadvantaged individuals/ groups The PAPs affected by land acquisition Communities living in the neighborhood settlements of the sub-project routes Mukhtars of the settlements | <ul style="list-style-type: none"> Stakeholder visits Consultation meetings | <p>In case of Project activities that may negatively affect public health and safety</p> <p>1 week before the days when there will be activities such as passage restrictions, road closures, traffic congestion, equipment shipment with heavy vehicles</p> | When needed | Contractor |
| | Sharing information on the Project activities and processes | <ul style="list-style-type: none"> All Stakeholders | <ul style="list-style-type: none"> KGM Websites E-mail to external stakeholders Online meetings | As the milestones of the project are completed | When needed | KGM |



| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|----------------|---|---|--|--|-------------------------------------|--|
| | | | <ul style="list-style-type: none"> ▪ Consultation meetings | | | |
| Implementation | Disclosure of the project information along with the E&S safeguard plans instruments <ul style="list-style-type: none"> ▪ ESIA ▪ ESMP ▪ SEP including GRM | Affected parties of; <ul style="list-style-type: none"> ▪ Governmental bodies ▪ Local Governmental bodies ▪ KGM workers ▪ Vulnerable/disadvantaged individuals/groups ▪ Municipalities ▪ Local sector ▪ NGOs | <ul style="list-style-type: none"> ▪ KGM Websites ▪ E-mail to external stakeholders ▪ Online meetings ▪ Online interviews ▪ Grievance Redress Mechanism ▪ Letter/post ▪ Stakeholder visits ▪ Consultation meetings | After the updated plans are approved | As documents are updated or changed | Environment and Social Specialist of KGM |
| | | <ul style="list-style-type: none"> ▪ Vulnerable/disadvantaged individuals/groups | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings | After the updated plans are approved | As documents are updated or changed | KGM |
| | Sharing information on the Project activities and processes | <ul style="list-style-type: none"> ▪ All Stakeholders | <ul style="list-style-type: none"> ▪ KGM Websites ▪ E-mail to external stakeholders ▪ Online meetings | As the milestones of the project are completed | When needed | KGM |
| | Community health and safety information meetings for local residents | <ul style="list-style-type: none"> ▪ Vulnerable/disadvantaged individuals/groups ▪ Communities living in the neighborhood settlements of the sub-project routes ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings | In case of Project activities that may negatively affect public health and safety If there will be a road closure or temporary traffic impact during work such as | When needed | Contractor |



| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|---------------|---------------------------------|---------------------|---------------|--|-----------|------------------|
| | | | | maintenance and repair 1 week before the days when there will be activities such as passage restrictions, road closures, traffic congestion, equipment shipment with heavy vehicles | | |



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 37 / 48 |

7 GRIEVANCE REDRESS MECHANISM

The main purpose of the Grievance Redress Mechanism (GRM) is to help resolve project-related notifications and complaints in a timely, effective and efficient manner to the satisfaction of all stakeholders.

GRM is also one of the most important tools of the stakeholder participation management process, which enables stakeholders to convey their problems, complaints and concerns about the project to the relevant units of the project, and to resolve the complaints with correct methods and healthy communication.

The Grievance Redress Mechanism aims to effectively address and finalize the problems, complaints or concerns submitted by stakeholders, without expiration of time, and to maintain healthy, trust-based stakeholder participation. The Grievance Redress Mechanism aims to manage complaints in accordance with the AIIB ESF requirements.

This Grievance Redress Mechanism explains the functioning of the Project complaint mechanism, complaint management steps, tools, how the system will be managed, and how stakeholders can access the complaint mechanism.

GM sets standards and principles to establish safe and constructive effective stakeholder communication.

The complaint mechanism developed in this context;

- Clearly disclosed and informed to all stakeholders,
- Complaints from stakeholders are recorded,
- Complaints are evaluated and concluded within the framework and time period determined by the procedure,
- GM is designed as a completely free, accessible and secure system in which no information is shared with third parties as adverse data.

7.1 Integration of Project Level Grievance Redress Mechanism

The Project's SEP and GRM will be developed, taking into account the complaint mechanism of KGM.

Currently, complaints can be submitted to KGM using the "Complaint Notification Form for Natural Persons" and "Complaint Notification Form for Legal Entities" available on the website.

Within the scope of the project, GRM will continue to be integrated and used in accordance with AIIB ESFs.

The structured forms currently used within the scope of GRM will be revised in accordance with the Project SEP and GRM requirements and will be expanded with additional tools and methods.

When the operation phase begins, Project SEP tools and methods will continue to be applied.

Complaints submitted to KGM regarding the Project will be recorded with the phrase "Türkiye Emergency Road Rehabilitation and Reconstruction Project" and evaluation and solution steps will be taken. Notifications/complaints recorded in the data file and included in the evaluation process will be concluded through mutual communication and consultations with stakeholders.

7.1.1 Recording and Evaluation of Anonymous Complaints

When both external and internal stakeholders have problems, concerns or difficulties in providing their contact information and identity information, the complaints submitted by the



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 38 / 48 |

stakeholders will be evaluated first and recorded as Anonymous complaints or anonymous suggestions.

Stakeholders can convey all their wishes and complaints through the forms on the website for external stakeholders³, which have been revised with the addition of an "anonymous" option.

Stakeholders can submit their complaints about the Project by the tools defined under the section 6.2 Methods and Tools of Stakeholder Engagement and, without giving their name and contact address.

Complaints received anonymously will be evaluated by applying the steps defined in the workflow. Within the scope of the complaint, it will be evaluated through research/examination processes and each stage will be recorded in the complaint mechanism system. Third parties will not be informed about complaints that must be kept confidential and no official notification/response will be made.

Although there will be no official feedback on the solution to be implemented when the complaint is concluded, if it is an issue that needs to be informed to the public and it is deemed necessary, it can be announced to the stakeholders through common boards / public and general communication tools.

7.1.2 Addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

In line with the notifications received, the units and employees who first handle the notification will be trained on how to manage SEA/SH related complaints. All relevant units and staff of the project will be trained with the basic skills to respond to SEA/SH disclosures in a compassionate and non-judgmental manner and to know how to intervene.

Türkiye currently has a national referral system for gender-based violence, which is followed by all institutions, not only for domestic violence, but also for workplace harassment, bullying, violence and SEA/SH in the workplace. These are under the auspices of the Ministry of Family, Labor and Social Services and are already described in detail in both the Turkish Labor Code and the Turkish Penal Code, explaining unacceptable behavior and detailing the relevant penalties.

KGM is obliged to make evaluations in accordance with both the national legislation and the AIB in this regard.

The grievances related to exploitation of female workers, including sexual harassment and abuse at the workplace and unfair treatment will be prioritized to take actions. The Environmental, Social and M&E Specialists, Project Director and PIU Head, Supervision Consultant shall be responsible for taking appropriate action in cases in which there is reason to believe that any right has been violated. The appropriate designated authorities will be informed about investigations into cases of Gender-based Violence/SEA/SH, and of the action taken as a result of such investigations.

- All grievances and feedbacks will be handled with a fair and objective approach. Transparency and accessibility are also two main concerns of this redress mechanism.
- In addition, the number, frequency, topics of grievances and feedbacks will be analyzed and reported periodically to the related units and administrative level.
- Based on these detailed reports, the most frequently addressed issues are identified and improvement activities are initiated.

³ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx>



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 39 / 48 |

7.2 Internal Grievance Redress Mechanism (Worker GRM)

Worker Grievance Redress Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees) in accordance with the AIIB ESS 1.

Each sub-project main Contractors establish and implement a Grievance Redress Mechanism for the workforce, including subcontractors, in the early stages of the Project.

Besides the internal Grievance Redress Mechanism described below will be open to all employees within the scope of the Project including all construction contractor workers.

Project workers will also be informed about the KGM SEP and GRM procedure and the Project level complaint mechanism, will be informed through meetings and encouraged to use it.

The Contractor GRM will ensure that any employee who raises a grievance will not be subject to any retaliation.

In addition, the following methods will be taken into consideration in managing internal complaints.

The Internal Grievance Redress Mechanism will be accessible for all type of the workers'/ sub-contractor's workers.

Complaints will be collected and reported to be managed in accordance with the SEP and GRM Procedure.

Employee complaints will be kept in the records of the main contractors of the Project, in the data recording log prepared for the "Türkiye Emergency Road Rehabilitation and Reconstruction Project" and presented in Annex 1: Grievance Log. These records will be reported to KGM every month. KGM Project will monitor the records received from the main contractors on a monthly basis and report them to the Bank quarterly.

The Grievance Redress Mechanism data log which is defined above will be a database that will include the operation of the process where the notifications, records, information and complaints of the workers will be kept, the complaints will be evaluated and monitored, and the results will be communicated to the complainant with the feedbacks.

The grievance boxes will be available in places such as the cafeteria, common rest area, work area, where employees can easily reach, but away from monitoring cameras. Boxes will be checked regularly and can only be opened by the responsible person to record in the Grievance Log. This system will be an important stakeholder engagement management tool and method for the Grievance Redress Mechanism to be used throughout the project and will be expanded and revised according to the Grievance Redress Mechanism procedure requirements.

In the Contractor Grievance Log, the complaint records will be kept according to the subjects of internal complaints. Internal complaints during this development process will be classified by the following titles;

- According to the subject (including environmental issues, working conditions, service, food, employee relations, equipment, discrimination, zero-tolerance violence, abuse, harassment, forced labor),
- According to the gender of the complainant,
- According to the situation of the complaint (open/close)
- According to the anonymous/contactable complaints.

Notification of Employees' Requests via email Address and Website: All employees can write their complaints, feedback, and suggestions, which they can make with cards, to the email addresses of the relevant persons. This information will be communicated to the employees



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 40 / 48 |

through the handbook. Feedback received here will be recorded in the Grievance Redress Mechanism and the process will be operated.

7.3 CİMER: Turkish Presidential Communication Center

Third national GRM is “CİMER” which is “Cumhurbaşkanlığı İletişim Merkezi - Turkish Presidential Communication Center” which is also a leg of the Project GRM.

Grievances can be conveyed by:

- Hotline “Alo 150” (established by Türk Telecom),
- Written - Online via www.cimer.gov.tr, and
- Written – Post via T.C Cumhurbaşkanlığı Külliyesi 06560 Beştepe, Ankara, TÜRKİYE

CİMER conveys 99% of received complaints to related governmental institutions.

7.4 AIIB Project-Affected People's Mechanism (PPM)

AIIB has established a Project-affected People’s Mechanism (PPM) to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by AIIB’s failure to implement the ESP when the complaints cannot be addressed satisfactorily through Project-level GRM or AIIB Management’s processes. [AIIB Policy on the Project-affected People’s Mechanism](#) and [Rules of Procedure of the PPM](#) guide the PPM. The Complaints-resolution, Evaluation, and Integrity Unit (CEIU) is responsible for the functioning of the PPM.

The PPM’s submission-handling functions include:

(1) Project Processing Queries

A Project Processing Query (PPQ) is designed to enable PAP to rapidly resolve their concerns about simple matters that arise during AIIB’s environmental and social due diligence of a Project and do not require dispute resolution. The due diligence includes screening, categorization, and assessment of the environmental or social impacts of the Project. PPQ can include inquiries about the consultation process related to a Project or requests to address environmental nuisances such as dust, noise, or mobility restrictions experienced during Project preparation.

(2) Requests for Dispute Resolution

Requests for Dispute Resolution (RDR) allow the PPM to seek to facilitate and coordinate the resolution of a dispute that has arisen over measures required to mitigate known and quantifiable potential or actual material adverse environment and social impacts that occur during AIIB's due diligence of a Project or Project implementation. The parties to the dispute typically include the Client and the Requestors. Still, they may also involve Management and contractors or other parties involved in the Project processing or implementation. This process aims to reach a time-bound and monitorable dispute resolution agreement between the parties concerned on actions to mitigate these impacts. Under this process, the PPM explores the PAP's mutually acceptable dispute resolution methods. This process may include consultative dialogue, information sharing, joint fact-finding, and creating a mediation mechanism or other methods.

(3) Requests for Compliance Review

The process under a Request for Compliance Review (RCR) involves an investigation by the PPM of allegations by Project-affected people that AIIB has failed to comply with its obligations under the ESP in its environmental and social due diligence of a Project during Project preparation or its oversight of the Project during implementation, thereby causing or being



likely to cause material adverse ecological or social impacts on the Project-affected people. If the allegations are substantiated, the process includes reviewing any action plan proposed by Management to address these impacts.

Further details are available on the following website:

<https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/how-we-assist-you/index.html>

7.5 Workflow of the Project Level GRM

The operation of the complaint mechanism will be carried out in accordance with the operation in the workflow given in Table 8.

Table 8. Principles and Standards of the GRM Workflow

| Workflow | Notification Status | Principles and Standards |
|--|---|---|
| Receiving the complaint | Notification has been received. | Complaints can be submitted verbally or in writing using any of the tools described in my "Tools and Methods for Stakeholder Engagement" section. |
| Registration of the complaint | The notification has been recorded. | The complaint received is recorded within two (2) days at the latest. |
| Evaluation | Under evaluation. | Immediately after the complaint is registered, the social expert will make the initial complaint assessment. |
| Confirmation notification of receipt of the complaint | Stakeholder is informed. | The stakeholder will be notified that the complaint has been received and recorded. Feedback will be provided based on the complaint's transmission method (mail, telephone, etc.). |
| Research and Review | Action has been assigned. | Social expert will assign the complaint to the relevant unit or person who needs to develop the solution based on the complaint and define his/her role. |
| Feedback to stakeholders | Research/review stage. | The relevant unit will develop a solution and corrective action within 10 days following the grievance recorded, obtain the necessary approvals, and report the result to the social specialist. |
| Corrective action implementation | Final feedback is given to the stakeholder. | Corrective action will be explained to the complainant, consulted and agreed upon. |
| Closing the complaint | Corrective action has been implemented. | The existing complaint will be eliminated by applying solution/corrective action. |
| Monitoring | Grievance is closed. | It will be determined that the current problem or complaint has disappeared/the approval of the complainant will be obtained and then the complaint will be closed within 30 days at the latest from the date of registration. |
| Receiving the complaint | Tracking is ongoing. | The result of the corrective action is The effectiveness of the corrective action, Assessment of remaining risks or impacts, Complainant satisfaction will be recorded and the process will be monitored. If it cannot be closed or an agreement is not reached, an evaluation and additional studies planning report will be prepared and presented to the management. |

| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 42 / 48 |

7.6 Monitoring and Reporting

In accordance with the document's objectives and scope, the SEP will be revised periodically (at least every six months) and updated as necessary during project implementation in order to manage Project stakeholder participation in the most effective way.

Separate from this process, any significant changes to the Project-related activities and program during the reviews will be reflected in the SEP.

In order to monitor the up-to-dateness of the plan, the effectiveness of communication tools and the functionality of the complaint mechanism, KGM will prepare quarterly monitoring reports and submit them to the AIIB.

According to the monitoring results, necessary improvements will be made to ensure the effectiveness of communication tools and the functionality of the complaint mechanism. During these monitoring, both the number and quality of complaints and information requests will be evaluated,

The project's ability to handle incoming notifications and complaints in a timely and effective manner will be evaluated.

Within the scope of these monitoring studies, the Key Performance Indicators (KPIs) are:

1. The number of KGM employees who were trained, provided information and shared their feedback about the project,
2. Number of consultations held within a reporting period (i.e. quarterly), number of stakeholder engagement activities, topics, participants, feedback.
3. Number of project complaints received within a reporting period (i.e. quarterly), and number resolved within the anticipated timeline.



Table 9. Monitoring Plan for the SEP

| ID | Issue | Key Performance Indicators | Target or Threshold Values | Legal Requirements for Monitoring | Monitoring Method | Monitoring Frequency | Reporting Frequency | Responsible Party |
|----|--|---|---|---|--|----------------------|---------------------|-------------------------------|
| 1. | SEP and GRM trainings | <ul style="list-style-type: none"> ▪ Number of trainings ▪ Number of personnel participating in training ▪ Number of non-compliances encountered in the workflow process | Ensuring that all relevant personnel participate in training | <ul style="list-style-type: none"> ▪ National Legislation ▪ AIIB ESS1 | <ul style="list-style-type: none"> ▪ Training records ▪ Observation of the personnel behavior ▪ Internal audits and reports | Monthly | Monthly | Contractor |
| | | | | | | Monthly | Semi-annually | KGM |
| | | | | | | Quarterly | Quarterly | Supervision Consultant |
| 2. | Disclosure of the SEP and GRM to stakeholders | <ul style="list-style-type: none"> ▪ Number of meetings ▪ Number of stakeholders participating in meetings | Ensuring that all relevant stakeholders invited and informed on the disclosure meetings | <ul style="list-style-type: none"> ▪ National Legislation ▪ AIIB ESS1 | <ul style="list-style-type: none"> ▪ Meeting records ▪ Participation list ▪ MoM of the disclosure meetings | Quarterly | Quarterly | KGM Supervision Consultant |
| 3. | Disclosure of the SEP and GRM to KGM Employees and Project workers | <ul style="list-style-type: none"> ▪ Number of meeting ▪ Number of personnel informed | Ensuring that all relevant personnel informed on SEP and GRM | <ul style="list-style-type: none"> ▪ National Legislation ▪ AIIB ESS1 | | Quarterly | Quarterly | KGM Contractor |



ANNEX 1: GRIEVANCE LOG

| GRIEVANCE LOG | | | | | | | | | | | | | | | | | | | | | |
|---|----------------------|--|-----------------|------------|---------------------------------|--------------------------------|------------------------------------|----------|----------|---------|--|---------------------------------|--|----------------------------------|--|--|---|---|-------------------------------------|---------------|--------|
| Suggestion/ Complaint Form Registration No: | Notification date | The tool/ channel through which the complaint received was conveyed | Sub- Project | Contractor | Category of the grievance | Subject of the grievance | Explanation of the grievance | Province | District | Village | Name and surname of the stakeholder (if anonymous, anonymous option will be entered) | Gender of the stakeholder | Phone number of the stakeholder | Address of the stakeholder | Feedback method preferred by the stakeholder | Email address of the stakeholder | Corrective action developed for the complaint | Responsible unit to implement corrective action | Result of the action taken | Close date | Budget |
| | | | | | | | | | | | | | | | | | | | | | |



ANNEX 2: REVISED GRIEVANCE REPORTING FORM FOR REAL PERSONS

This Form will be disclosed on the Project website for the use of all external stakeholders⁴.

| | | |
|---|---|------------------|
| Name and surname: | | |
| Gender: | | |
| Turkish republic identification number | | |
| Check here for anonymous option () | | |
| Telephone: | | |
| Address Type | Home address | Business Address |
| Address | | |
| Province: | | |
| District: | | |
| Village/neighborhood: | | |
| Address description: | | |
| Email Address | | |
| Grievance Category | Asphalt Information Bad road (State and Provincial road) Rough road (Highway) landslides Human Resources Expropriation Issue closed road snow fight intersections Regarding OGS and HGS Park areas and afforestation Art structures (Repair) Art structures (Construction) Flooding Traffic signs patch work Pedestrian underpass and overpass requests Road asphalt condition Roadside Facilities road line | |

⁴ <https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/DisKrediliProjeler.aspx>



| | | |
|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 46 / 48 |

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| | Road status information Road salting work Road Construction issue Damage to the road Other |
| Subject of the Complaint | |
| Complaint Detail | |
| Complaint solution proposal | |
| Option to get feedback | |
| Subject of the Complaint | E-mail Telephone SMS I don't want to receive feedback |



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|------------------------------------|-----------------|-------------------------------|
| STAKEHOLDER ENGAGEMENT PLAN | | CNR-KGM-TERRRP-SEP-001 |
| Final | Date: June 2024 | Page 47 / 48 |

ANNEX 3: COMPLAINT APPLICATION FORM TO BE USED FOR WRITTEN COMPLAINTS TO BE RECEIVED THROUGH CHANNELS OTHER THAN THE WEBSITE (VIA MUKHTAR, LETTER, EMAIL, ETC.).

| | | |
|--|--|---|
| Şikayetin Alındığı Yer/ Location of Complaints Received | | Tarih/ Date |
| Alan Yetkilinin Adı/ Name of Person in Charge | | Şikayet Kayıt No/ Complaint Register Number |
| ŞİKÂYET SAHİBİ / COMPLAINANT INFO (Şikâyet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. / The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond.) | | |
| Ad Soyad/ Name Surname | | Şikâyetin Geliş Yolu / Form of Complaint: |
| TC Kimlik No/ Identification Number | | |
| Telefon/ E-Posta Telephone/ E-mail | | |
| Mahalle-Köy-İlçe-İl/ Neighborhood-Village –District - Province | | |
| ŞİKÂYET DETAYLARI / DETAILS OF COMPLAINT | | |
| Şikâyet Konusu / Complaint | | |
| Şikâyet sahibi tarafından talep edilen çözüm / Solution requested by the Complainant | | |
| Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası Name Surname and Signature of the Registerer | Şikâyet Sahibinin Ad Soyad ve İmzası Name Surname and Signature of Complainant | |



ANNEX 4: SAMPLE GRIEVANCE CLOSURE FORM

| | | | |
|--|---|---|---|
| Şikayet Numarası: Grievance No: | Şikayet sahibi: Complainant Info | Şikayet kapatma sonucu özeti: (Summary of complaint closure result): | |
| Alınması Gereken Uzun Vadeli Düzeltici faaliyetler (Gerekli ise): Identify the long-term corrective actions (if necessary) | Şikayet kayıt tarihi: Date of Complaints Received | | |
| DÜZELTİCİ FAALİYETİN KONTROLÜ VE KARARI / CONTROL AND DECISION OF CORRECTIVE ACTION | | | |
| Düzeltici Faaliyetin Aşamaları Corrective Actions | Düzeltici faaliyetin planlandığı tarih Date when corrective action is planned | Düzeltici faaliyetin uygulandığı tarih Date the corrective action was implemented | Düzeltici faaliyetin sonucu Result of corrective action |
| 1. | | | |
| 2. | | | |
| 3. | | | |
| 4. | | | |
| 5. | | | |
| 6. | | | |

