



STAKEHOLDER ENGAGEMENT PLAN
CVTS-SEP-003
(Rev.00)





**RESEARCH TECHNOLOGY MINING
ENGINEERING CONSULTING
LANDSCAPE TRAINING CONSULTANCY AND CONTRACTING
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ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN (SEP)

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CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	4
1 INTRODUCTION / PROJECT DESCRIPTION.....	5
1.1 Overview.....	5
1.2 ASAŞ Facilities.....	6
1.3 Location	6
1.4 Scope of Influence	10
2 LEGAL FRAMEWORK.....	12
2.1 Turkish Legislation Requirements	12
2.2 International Standards	15
2.3 Gaps Between Turkish Legislation and International Guidelines	16
3 ROLES AND RESPONSIBILITIES IN THE IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT ACTIVITIES.....	17
4 STAKEHOLDER ENGAGEMENT PLAN: OBJECTIVES AND DEFINITION..	20
5 STAKEHOLDER IDENTIFICATION AND ANALYSIS	21
5.1 Methodology	21
5.2 Facility Stakeholders.....	23
5.3 Affected Parties and Other Relevant Parties.....	25
5.4 Vulnerable/Disadvantaged Individuals or Groups.....	26
6 STAKEHOLDER ENGAGEMENT PROGRAM	27
6.1 Summary of Completed Stakeholder Engagement Activities	27
6.2 Summary of Methods , Tools , and Techniques for Stakeholder Engagement.....	27
6.3 Stakeholder Engagement Plan	28
6.4 Stakeholder Feedback Process.....	34
6.5 Potential Social Impacts and Mitigation Measures.....	37
7 CORPORATE SOCIAL RESPONSIBILITY PROJECTS.....	40
8 GRIEVANCE MECHANISM	51
8.1 National Grievance Mechanism.....	52
8.2 Project - Level Grievance Mechanism.....	53
8.3 Grievance Mechanism for Employees	53
9 MONITORING AND REPORTING	57
10 TRAINING PROGRAMS.....	58
APPENDICES	59
ANNEX - 1 Complaint Form (ASAŞ - Form No: IK-FR-219-2019.06-2022.01-04)...	59
ANNEX - 2 Complaint Closure Form (Printed).....	61
ANNEX - 3 Feedback Form (Internet).....	63
ANNEX - 4 Feedback Platform Poster.....	64



ANNEX - 5 Photo of Current Suggestion Complaint Box	65
ANNEX - 6 Complaint Box Opening Control Form (ASAŞ- Form No: IK-FR-252-2022.02)	67
ANNEX - 7 SEP Organization Chart	68
ANNEX - 8 Stakeholder Consultation Meeting Content and Records	69
ANNEX – 9 Internal Stakeholder Information Video	76

LIST OF TABLES

	<u>Page</u>
Table 1-1 Integrated Facility Product and Production Capacity.....	6
Table 2-1 Specific Objectives of the Turkish National EIA Regulation (EIA Regulation, Article 9)	15
Table 3-1 Basic Duties and Responsibilities	17
Table 3-2 Stakeholder Engagement Plan Officers.....	19
Table 5-1 Stakeholder Groups	24
Table 6-1 Stakeholder Engagement Monitoring Program	30
Table 6-2 Stakeholder Consultation Meetings (2025).....	35
Table 6-3 Mitigation for Managing Potential Impacts	38
Table 8 -1 CİMER Communication Channels.....	52
Table 8 -2 YİMER Communication Channels.....	52
Table 8 -3 Grievance Mechanism Communication Channels	53
Table 9 -1 Key Performance Indicators (KPIs) and Monitoring Activities – Stakeholder Engagement.....	57
Table 10 -1 Existing and Proposed Training - Seminars	58

LIST OF FIGURES

Figure 1-1 Project Location	12
Figure 1-2 Project Site Map	13
Figure 1-3 Project Impact Area Map	1
Figure 7-1 Golden Ball for Every Nest Project Poster	42
Figure 7-2 Art Project.....	44
Figure 7-3 World Water Day Announcement Image.....	49

	ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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ABBREVIATIONS

AIIB	AIIB (Asian Infrastructure Development Bank)
SE/APP	Protection Plan Against Sexual Exploitation and Abuse
EIA	Environmental Impact Assessment
EHS	Environment, Health and Safety
ESS	Environmental and Social Standards
ESMP	Environmental and Social Management Plan
IFC	International Finance Corporation
OHS	Occupational Health and Safety
WMP	Workforce Management Plan
CHMP	Cultural Heritage Management Plan
CRP	Corporate Responsibility Projects
SEP	Stakeholder Engagement Plan
PS	Performance Standard
CHSMP	Community Health and Safety Management Plan
TMP	Traffic Management Plan
IQI	Instant Quality Instead

EXECUTIVE SUMMARY

This Stakeholder Engagement Plan (SEP) has been prepared as an important component of the environmental and social management activities carried out for the production facilities of ASAŞ Aluminum Industry and Trade Inc. The Plan has been developed to comply with the legislation of the Republic of Turkey, the International Finance Corporation (IFC) Performance Standards (PS), the World Bank's Environmental and Social Framework (ESF), and other international requirements.

The SEP aims to systematically identify relevant stakeholders, determine potential social impacts, plan necessary measures to mitigate impacts, operate an inclusive grievance mechanism, and establish regular monitoring and reporting processes.

The SEP identifies key stakeholder groups, including local communities, facility employees, municipal authorities, public institutions, NGOs, associations, educational institutions, health institutions, businesses, and vulnerable groups, and ensures their involvement in decision-making processes. A complaint mechanism has been established to provide accessible channels for stakeholders to communicate their concerns, receive responses, and ensure that their complaints are resolved in a timely manner. Specific strategies have also been identified to facilitate the participation of disadvantaged/vulnerable groups who may experience difficulties in accessing information or attending meetings.

SEP also facilitates ASAŞ's social responsibility projects, which are carried out with a strong sense of corporate citizenship, and education.

1 INTRODUCTION / PROJECT DESCRIPTION

This plan presents the Stakeholder Engagement Plan (SEP) concerning the 'ASAŞ Aluminum Production Facility, ASAŞ Extrusion Production Facility, ASAŞ Composite Panel Production Facility, ASAŞ PVC Profile and Shutter Production Facility, and ASAŞ Aluminum Flat Product Production Facility' (hereinafter referred to as the 'Facilities') and has been prepared by ÇEVTAŞ Research Technology Mining Engineering Consultancy Landscape Training Consultancy Contracting Trade Ltd. Co. (hereinafter referred to as 'ÇEVTAŞ') on behalf of "ASAŞ Aluminum Industry and Trade Inc." (hereinafter referred to as 'ASAŞ').

In 2021, ASAŞ commissioned the preparation of an Environmental and Social Management Plan (ESMP) in accordance with the International Finance Corporation's (IFC) Performance Standards (PS), the Asian Infrastructure Investment Bank's (AIIB) Environmental and Social Standards (ESS), and National Legal Requirements, due to its potential search for financing from the Turkish Development and Investment Bank for the existing facility.

ASAŞ has prepared a Stakeholder Engagement Plan in accordance with the IFC's Performance Standards and the AIIB's Environmental and Social Standards (ESS) to date (January 2021) ¹, and this plan has been subsequently revised (August 2022, October 2025) ². ASAŞ's "Stakeholder Engagement Plans" are available on its official website .

This Stakeholder Engagement Plan has been prepared by ÇEVTAŞ for ASAŞ with the aim of conducting a social impact assessment, determining the conditions for consultation with stakeholders, and thereby eliminating/minimizing negative social impacts before they arise. The SEP is a publicly available document subject to regular updates to reflect the results of ongoing, open discussions with stakeholders. ASAŞ invites its stakeholders to actively participate in making this SEP an interactive and dynamic document. ASAŞ commits to implementing this plan throughout all phases of the Project.

This plan has been prepared in accordance with IFC Performance Standard-1 Assessment and Management of Environmental and Social Risks and Impacts (1 January ³2012) .

1.1 Overview

ASAŞ was founded in Gebze in 1990. ASAŞ is one of Turkey's most important industrial companies and exports to more than 90 countries. Combining its expertise in production with advanced design and product development techniques, ASAŞ markets its high-quality products under its own brand. ASAŞ has a wide range of products for the construction market under its brands; ASAŞPEN (PVC door and window systems), NATURALBOND (aluminum

¹ <https://www.asastr.com/sites/1/upload/files/PKP-2189.pdf>

² https://www.asastr.com/sites/1/upload/files/PKP_2022_Rev01-2262.pdf

³ <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-1-tr.pdf>

composite panels), ALUDES (aluminum flagpoles and lighting poles), RESCARA (aluminum door, window and facade cladding systems), NATUROLL (shutter systems, garage doors and motor control systems).

ASAŞ serves its customers in its aluminum profile, composite panel, aluminum flat product, PVC profile, and shutter production facilities located in Akyazı and Karapürçek, covering a total area of 1.300.000 m², with 400.000 m² of covered space. The production variety and production capacity of the integrated facility are shown in Table 1-1.

Table 1-1 Integrated Facility Product and Production Capacity

Product	Production Capacity
Aluminum Billet	90,000 tons/year
Aluminum Profile	75,000 tons/year
Anodized Profile	40,000 tons/year
Powder Coated Profile	24,000 tons/year
Aluminum Flat Products	Casting: 150,000 tons/year Rolling mill: 140,000 tons/year, Foil: 60,000 tons/year Painted Sheets: 45,000 tons/year
Aluminum Composite Panel	7,500,000 m ² /year
PVC Profile	35,000 tons/year
Lamel Shutter	30,000,000 meters/year
Pre-cut	40,000 units/year

Source: <https://www.asastr.com/kurumsal/hakkimizda/>

1.2 ASAŞ Facilities

ASAŞ has 5 production facilities located in the Sakarya Organized Industrial Zone, which include processing plants for aluminum profile systems, composite panels, PVC window and door systems, shutter and garage door systems, and aluminum flat products.

ASAŞ facilities hold ISO 14001, ISO 16949, ISO 9001, ISO 27001, ISO 50001, and OHSAS 18001 quality certificates, as well as the ISO 10002 Customer Satisfaction Management Certificate, in accordance with international norms and standards.

ASAŞ currently employs 2.931 people. In addition, recruitment activities are ongoing in line with increasing production demand.

1.3 Location

ASAŞ's facilities are located in the Organized Industrial Zone within the borders of Akyazı and Karapürçek districts of Sakarya province. The facilities are situated 12 km southeast (SE) of Sakarya city center, 4 km southwest (SW) of Akyazı district center, and 8.5 km northeast (NE) of Karapürçek district center as the crow flies.



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



- Aluminum Profile and Composite Panel Production Facility, PVC Profile and Shutter Production Facility: Kışla Alanı Street No: 2-2/1, 54400 Akyazı - Sakarya / Turkey
- ASAŞ Aluminum Flat Products Manufacturing Facility: Fabrikalar Street No. 50, 54400 Karapürçek - Sakarya / Turkey

Facilities, 300.000 It has a total area of 923.000 m², 1,000 of which is closed. Ownership of the facility area is registered in the name of ASAŞ Industry and Trade Inc. Land acquisition began in March 2018 and was completed in August 2020.



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



ASAŞ operates in the production activities mentioned above. Figure 1-1 shows the location of the facilities. The location map is

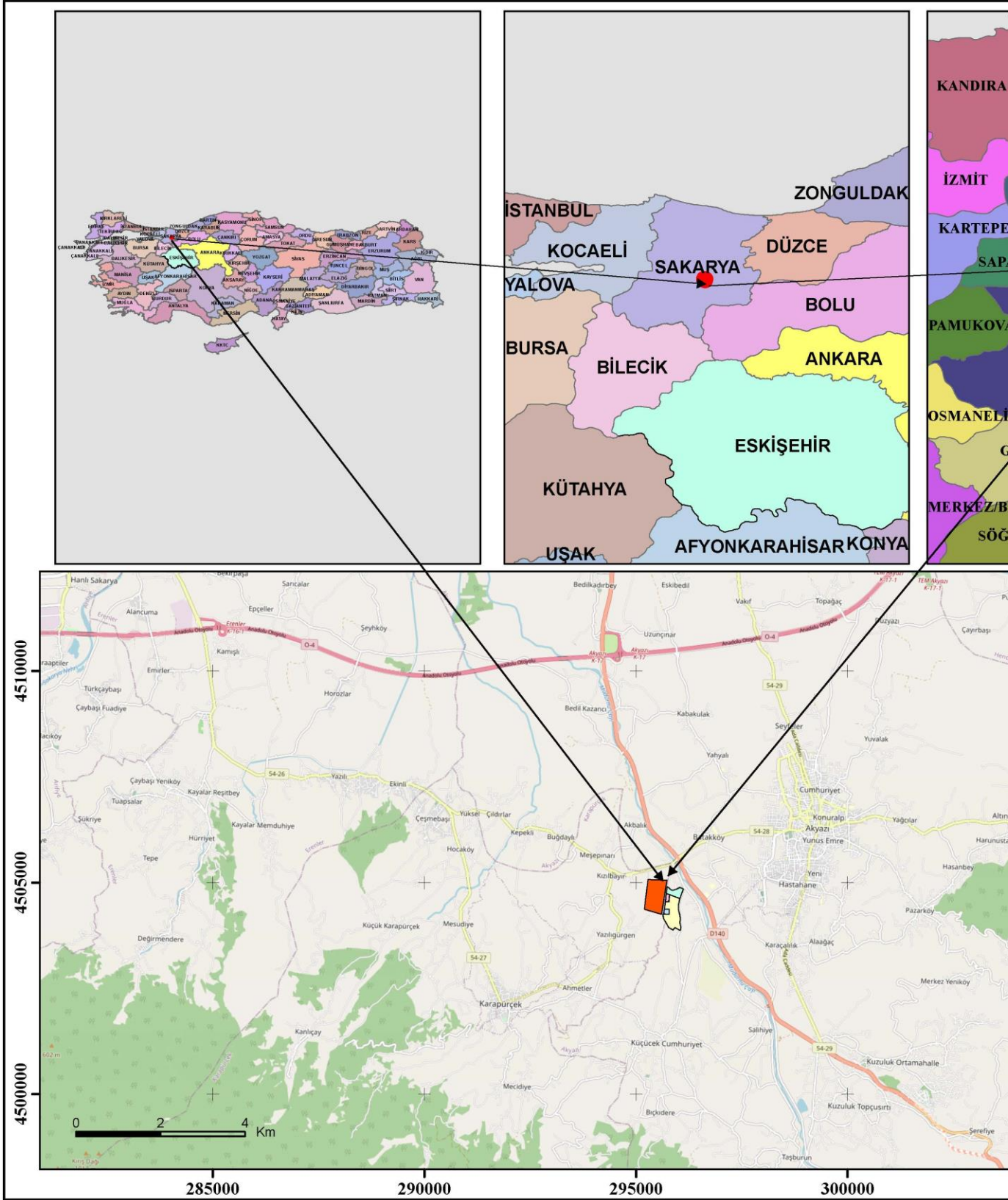


Figure 1-2

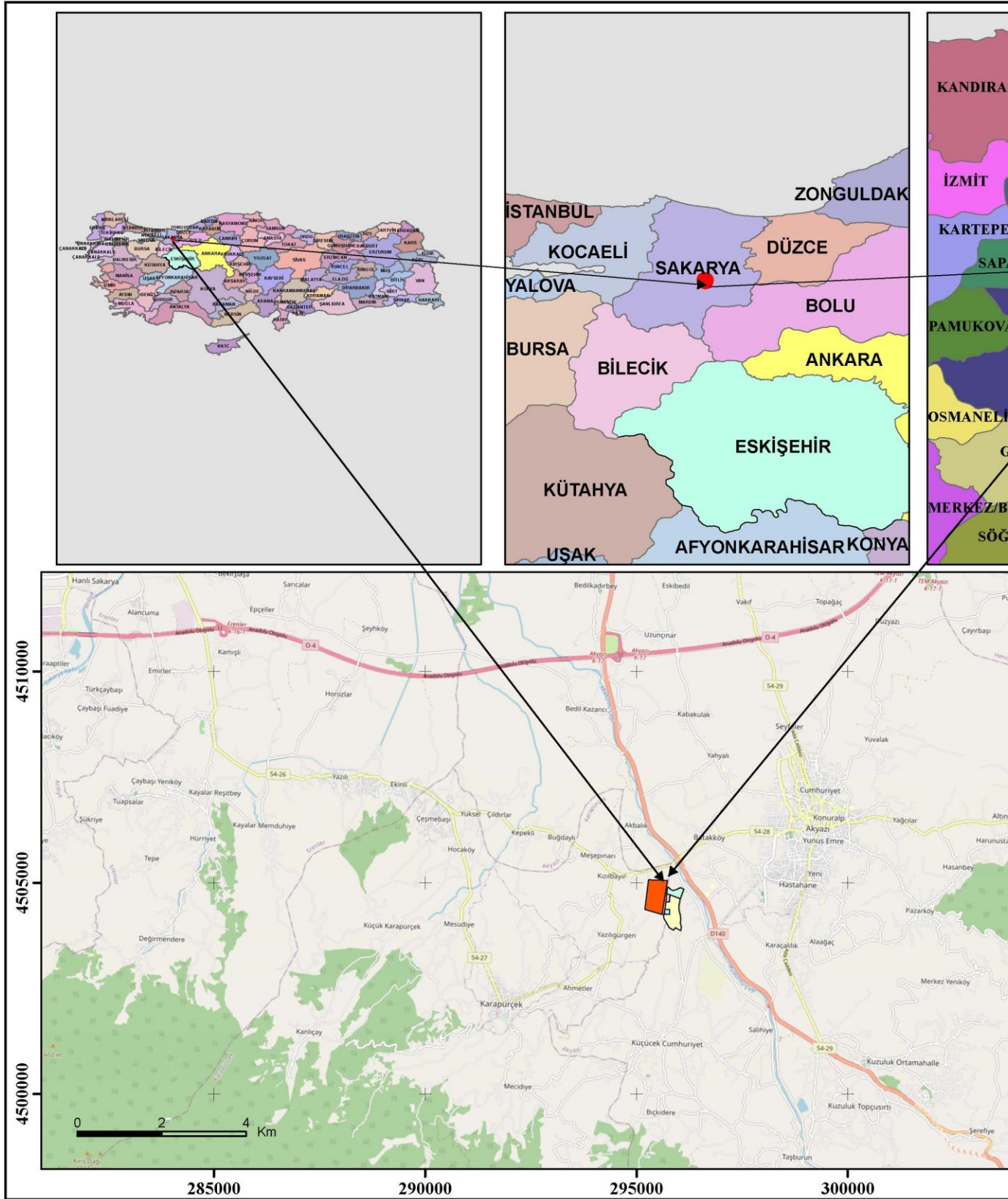




Figure 1-2.

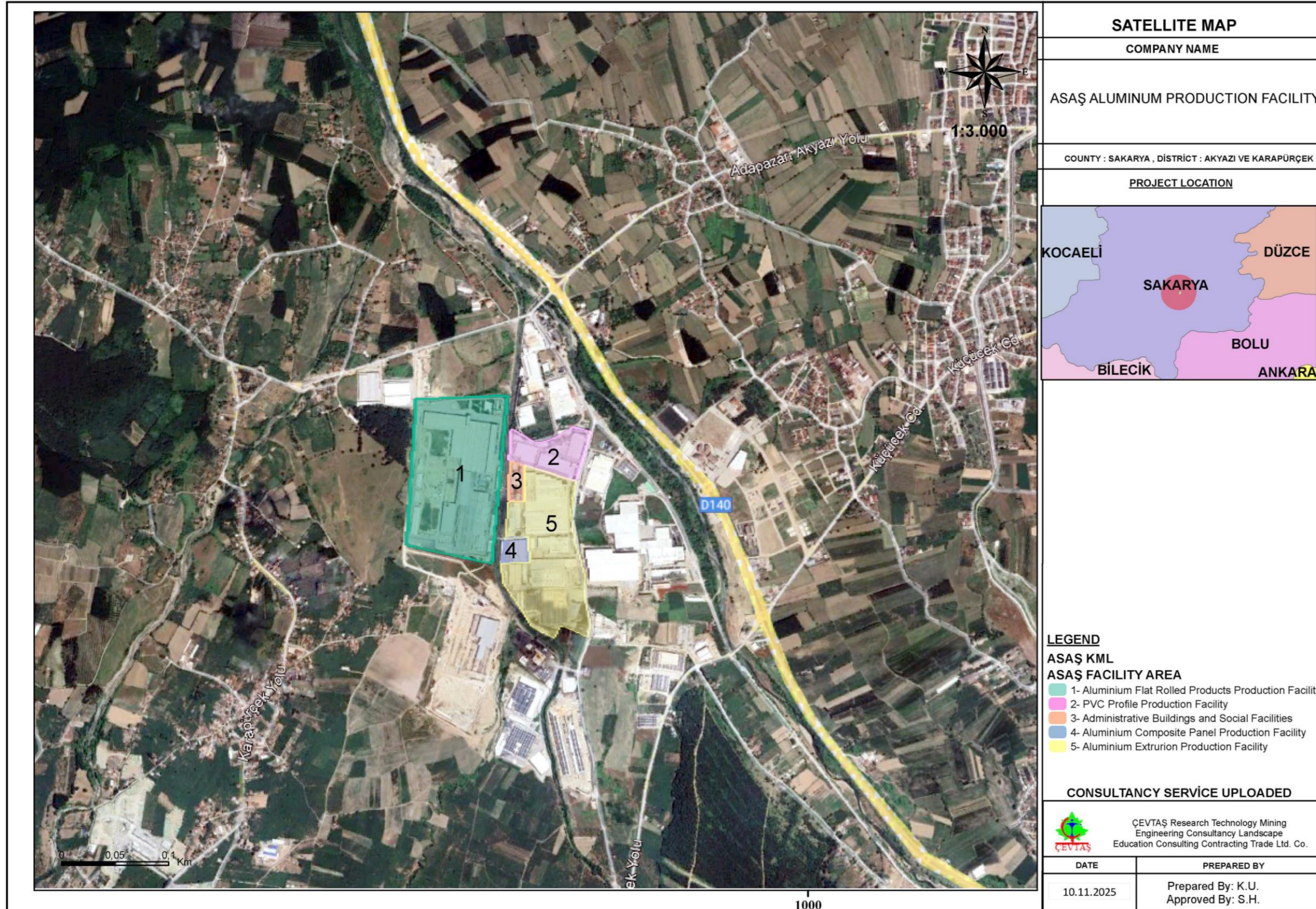


Figure 1-1 Project Location

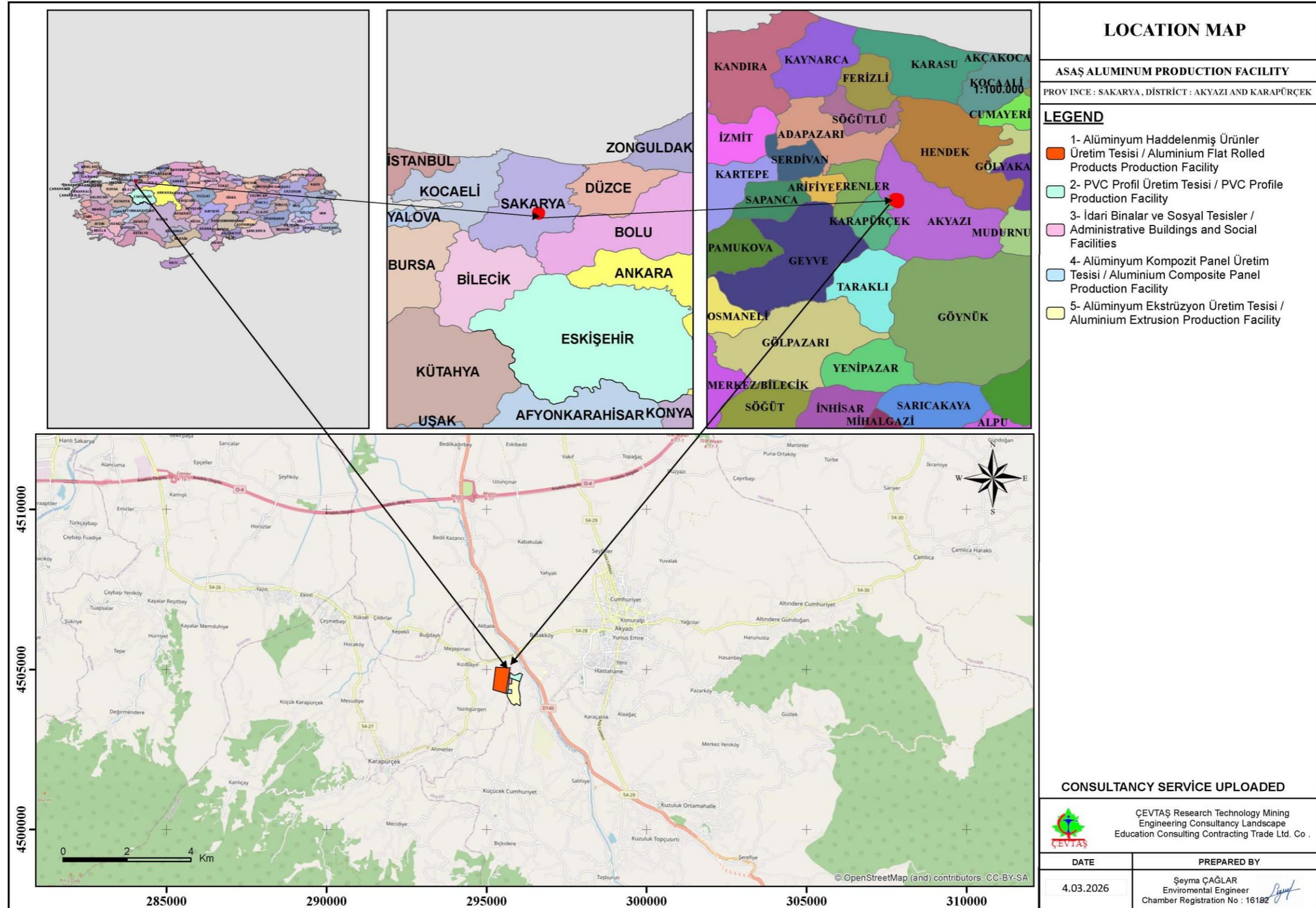


Figure 1-2 Project Site Map .

1.4 Scope of Influence

Within the scope of the project, the impact area is defined as "the area affected by the planned project before, during, and after operation." The Impact Area (EA) can vary according to different types of impacts and different environmental components (physical, biological, social).⁴

According to the World Bank, the impact area refers to the geographical area where the environmental and social impacts of a project are felt and includes direct, indirect, and cumulative impacts. The direct impact area covers the area where the project activities are directly carried out and where the most significant impacts are felt. The indirect impact area includes the environmental, social, and economic areas indirectly affected by the project activities.

In this regard, the impact area of ASAŞ facilities consists of urban or rural areas that are likely to be affected, in addition to the direct facility activity areas.

Within the scope of the SEP, residents of the settlements closest to the project area are referred to as the "Local Community."

The EA boundaries have been determined taking into account the environmental and social aspects of the ASAŞ facilities. This area includes the ASAŞ facility sites, the surrounding settlements (Küçücek İstiklal Neighborhood in Akyazı District and Yazılıgürgen Neighborhood in Karapürçek District), and the transportation routes belonging to the facilities.

A distance of 1 km radius has been defined as the primary impact area where potential environmental and social impacts will be most concentrated. The Impact Area Map is shown in Figure 1-3 This distance was determined based on an assessment of the potential impacts of the facilities, and it is anticipated that most of the impacts will be concentrated within this area.

⁴IFC, Performance Standard 1

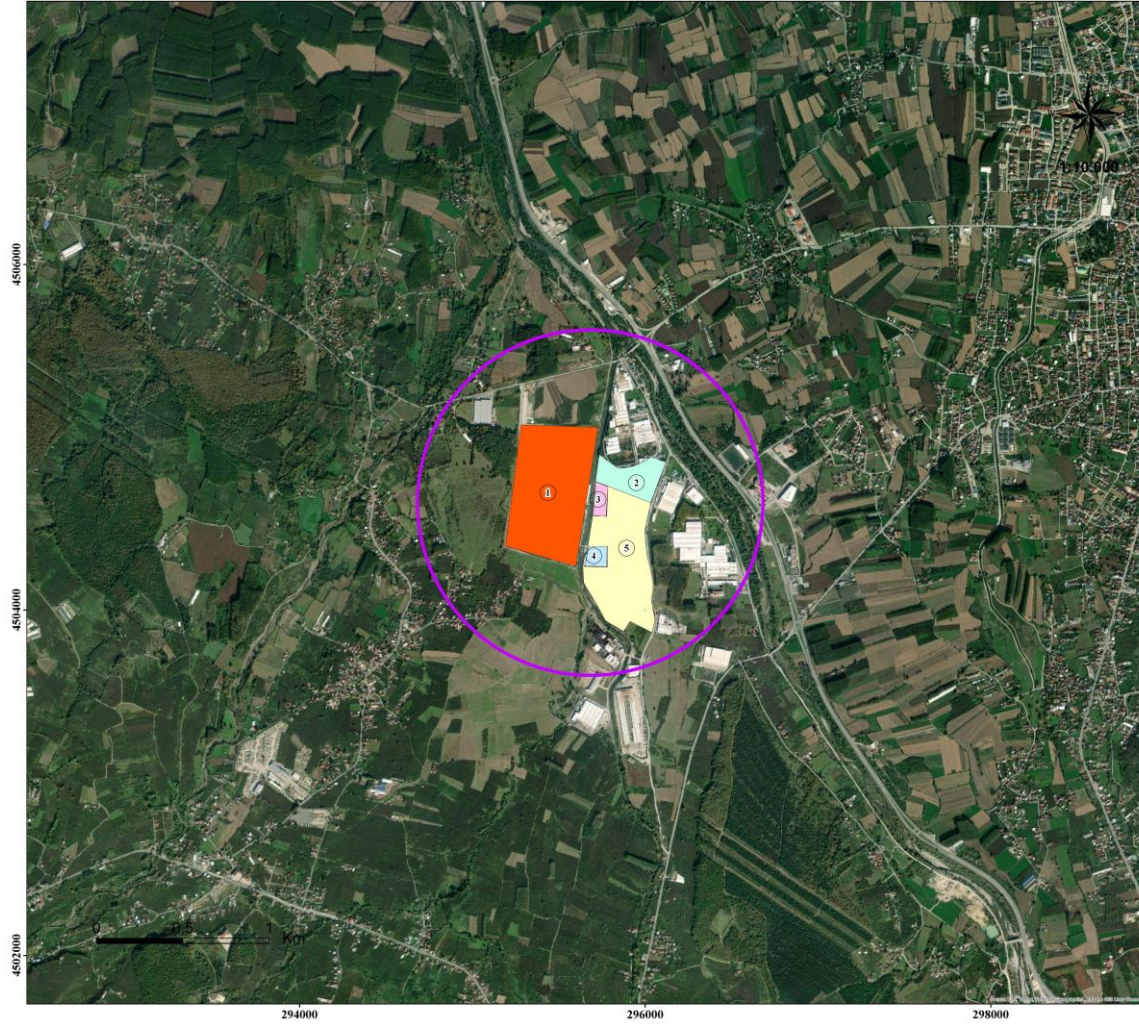


Figure 1-3 Project Impact Area Map

AREA OF INFLUENCE MAP

ASAŞ ALUMINUM PRODUCTION FACILITY

PROV INCE : SAKARYA, DİSTRİKT : AKYAZI AND KARAPÜRÇEK


PROJECT LOCATION



LEGEND

- 1- Alüminyum Haddelenmiş Ürünler Üretim Tesisi / Aluminium Flat Rolled Products Production Facility
- 2- PVC Profil Üretim Tesisi / PVC Profile Production Facility
- 3- İdari Binalar ve Sosyal Tesişler / Administrative Buildings and Social Facilities
- 4- Alüminyum Kompozit Panel Üretim Tesisi / Aluminium Composite Panel Production Facility
- 5- Alüminyum Ekstrüzyon Üretim Tesisi / Aluminium Extrusion Production Facility
- Etki Alanı / Area of

CONSULTANCY SERVICE UPLOADED

 ÇEVTAŞ Research Technology Mining Engineering Consultancy Landscape Education Consulting Contracting Trade Ltd. Co.	
DATE	PREPARED BY
04.03.2026	Şeyma ÇAĞLAR Environmental Engineer Chamber Registration No : 16192

2 LEGAL FRAMEWORK

This section outlines how ASAŞ will organize its stakeholder engagement activities in accordance with national and international requirements.

2.1 Turkish Legislation Requirements

Constitution of the Republic of Türkiye

is the “Constitution of the Republic of Turkey,” which includes articles related to human and labor rights, social peace, and stakeholder participation. These articles are as follows:

I. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law without discrimination on grounds of language, race, colour, sex, political opinion, philosophical belief, religion or similar reasons. Women and men have equal rights, and these rights are an obligation of the state to provide and are already in effect. Measures taken for this purpose cannot be interpreted contrary to the principle of equality.

II. Prohibition of Forced Labour

ARTICLE 18. No one shall be forced to work. Forced labor is prohibited. Employers are not permitted to take deposits from workers or to withhold their identity cards.

III. Freedom of Thought and Expression

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to disclose their thoughts or opinions for any reason or purpose whatsoever; nor shall they be condemned or accused on the grounds of their views.

IV. Freedom of Expression and Dissemination of Thought

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

V. Right to Petition

ARTICLE 74. - Turkish citizens and resident foreigners have the right to submit their requests and complaints concerning themselves or the public in writing to the competent authorities and the Grand National Assembly of Türkiye.

Freedom of Information Law

Everyone has the right to be informed about the activities of public institutions and organizations, as well as professional associations. The procedures and principles for obtaining information in accordance with the principles of transparency, equality, and impartiality are regulated in the Law on the Right to Information No. 4982 (Official Gazette No. 25269 dated 24.10.2003).

Law on the Exercise of the Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Grand National Assembly of Turkey and the competent authorities regarding their requests and complaints concerning themselves or the public, in accordance with this article of the Law No. 4982 on the Exercise of Petition Rights (Official Gazette, No. 3071, dated 01.11.1984).

Labor Law No. 4857 (Official Gazette No. 25134 dated 10.06.2003)

Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. Discrimination based on language, race, gender, political opinion, philosophical belief, religion, or similar reasons is not permitted in employment relationships. Except for biological reasons or reasons related to the nature of the work, the employer may not directly or indirectly discriminate against an employee based on gender or motherhood in the establishment, terms, performance, or termination of the employment contract. Differential remuneration for similar or equivalent work is not permitted.

The employee's right to immediate termination is based on a valid reason.

ARTICLE 24. Whether the term is fixed or not, the employee may terminate the contract before its expiration or without waiting for the notice period. Unless otherwise stipulated by law, the employment contract is not subject to any specific form.

Shift

ARTICLE 41. Overtime work may be required for reasons such as the general benefit of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work may only be required of all or some of the workers in cases of actual or threatening malfunction, urgency of work on machinery, tools or

equipment, or force majeure. Compulsory overtime work may not exceed the time necessary to ensure the normal operation of the workplace.

Working Age and Prohibition of Child Labor

ARTICLE 71. It is forbidden to employ children under the age of fifteen. However, children who have reached the age of fourteen and completed their primary education may be employed in light work that does not hinder their physical, mental and spiritual development.

Law No. 6356 on Trade Unions and Collective Bargaining Agreements (Official Gazette No. 28460 dated 07.11.2012)

Four types of collective bargaining agreements are established: workplace collective bargaining agreements, enterprise collective bargaining agreements, group collective bargaining agreements, and framework agreements.

Law No. 6701 on the Turkish Human Rights and Equality Institution (Official Gazette No. 29960, dated 20.04.2016)

ARTICLE 3 - Everyone is equal in enjoying legally recognized rights and freedoms. Discrimination based on gender, race, color, language, religion, belief, sect, philosophical and political views, ethnic origin, wealth, birth, marital status, health status, disability, and age is prohibited under this Law.

Law No. 6698 on the Protection of Personal Data (Official Gazette No. 29677 dated 07.04.2016)

ARTICLE 12 - (1) The data controller;

- a) To prevent the unlawful processing of personal data,
- b) To prevent unlawful access to personal data,
- c) To ensure the protection of personal data,

For this purpose, it must take all necessary technical and administrative measures to ensure an appropriate level of security.

Environmental Law No. 2872 (Official Gazette No. 18132, dated 11.08.1983)

The purpose of environmental law is to protect and improve the environment, which is the common asset of all citizens; to better utilize and protect land and natural resources in rural and urban areas; to prevent water, soil, and air pollution; and to regulate all kinds of measures and regulations to improve and secure the health, civilization, and living conditions of present and future generations, in accordance with specific legal and technical principles, in line with

	ASAS ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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economic and social development goals, while protecting the country's plant and animal life, natural and historical riches.

Environmental Impact Assessment (EIA) Regulation

In accordance with Article 9 of the EIA Regulation published in the Official Gazette dated July 29, 2022 and numbered 31907, a Public Information and Participation Meeting is held to inform the public about the investment and to obtain their opinions and suggestions regarding the project. According to the EIA Regulation, a Public Information and Participation Meeting is not required for the Project listed in Annex 2 of the Regulation. The Specific Objectives of the Public Information and Participation Meeting within the scope of the Regulation are presented in **Hata! Başvuru kaynağı bulunamadı**. The obligation to prepare a Stakeholder Engagement Plan was introduced in the Turkish National EIA Regulation with the EIA Regulation published in the Official Gazette dated July 29, 2022 and numbered 31907, and the Project's EIA process was completed before 2022.

Table 2-1 Specific Objectives of the Turkish National EIA Regulation (EIA Regulation, Article 9)

<p style="text-align: center;"><i>Meeting on public information and participation in the process</i></p> <p>ARTICLE 9 - (1) <i>In order to inform the public about the investment and to receive their opinions and suggestions regarding the project, a public information and participation meeting is held with the participation of institutions/organizations authorized by the Ministry and the project owner, on a date determined by the Ministry, at a central place and time determined by the provincial directorate, where the relevant public expected to be most affected by the project can easily reach.</i></p> <p>(2) <i>Institutions/organizations authorized by the Ministry shall publish an announcement specifying the date, time, place and subject of the meeting in a newspaper defined as a widespread periodical and in a local periodical published in the region where the project will be carried out, at least 10 calendar days before the meeting date.</i></p> <p>(3) <i>The public information and participation meeting is chaired by the provincial director or a designated official. The meeting will ensure that the public is informed about the project and receives their opinions, suggestions, and questions. The opinions, suggestions, and objections expressed by the public will be recorded in the meeting minutes. The meeting chair may request that participants submit their opinions in writing. The meeting minutes will be sent to the Ministry, with a copy retained by the provincial directorate.</i></p> <p>(4) <i>Before determining the special format, commission members may examine the area where the project is planned and attend the public information and participation meeting to be held on the notified date.</i></p> <p>(5) <i>A stakeholder engagement plan (SEP) will be prepared by institutions/organizations qualified by the Ministry to inform the public about the project and its impacts and to solicit their opinions and suggestions regarding the project. The prepared stakeholder engagement plan will be submitted as an annex to the EIA application file. When deemed necessary, the Ministry may request that qualified institutions/organizations undertake additional public information activities throughout the EIA process, such as distributing informative brochures, conducting surveys and seminars, or creating a website to share information about the project. This plan will also be updated during the EIA process if requested by the Ministry.</i></p>

2.2 International Standards

This report has been prepared using relevant IFC Performance Standards and international requirements as a guide. IFC is an international financial institution that provides advisory and asset management services for the development and implementation of environmental and

social management systems to help institutions improve their operations. Founded in 1956 as the private sector arm of the World Bank Group, IFC aims to reduce poverty and promote development, and to advance economic development through investments in commercial projects. To provide a way to manage social and environmental risks and impacts on projects, IFC established the Social and Environmental Sustainability Performance Standards, updated in 2012. The Performance Standards are designed to help clients prevent, mitigate, and manage risks and impacts as a way to do business sustainably, including obligations to engage with stakeholders and share information on project-level activities. In other words, IFC applies the Sustainability Framework, in conjunction with other strategies, policies, and initiatives, to guide its business activities to achieve its overall development goals. The Performance Standards may also be adopted by other financial institutions.

The IFC guidelines to be followed during this Project are as follows:

- IFC General EHS Guidelines dated 30 April 2007,
- IFC Performance Standards Environmental and Social Management System Implementation Manual Metal Products Manufacturing

2.3 Gaps Between Turkish Legislation and International Guidelines

The most important issue requiring further elaboration in Turkish Environmental Legislation is "Social Impact Assessment (SIA)". Internationally financed projects require additional studies and practices in this area to comply with international standards. For example, the Turkish EIA Regulation does not require the implementation of a detailed socio-economic field study, the provision of information about the project area, or the establishment of a grievance mechanism. However, these are required by international standards.

3 ROLES AND RESPONSIBILITIES IN THE IMPLEMENTATION OF STAKEHOLDER ENGAGEMENT ACTIVITIES

ASAŞ employs various methods to monitor compliance with Turkish legislation and monitor changes. These include its own expert staff, International Standard of Organization 14001 certification, corporate relations, and legal consultancy services. In-house training is also provided to inform employees on these matters. These training programs cover topics such as sustainability, energy management, environmental management (waste storage, carbon emissions, etc.), and OHS standards.

ASAŞ focuses on human and labor rights within the company in accordance with the International Finance Corporation (IFC) Environmental and Social Sustainability Performance Standards. Therefore, it has identified internal and external stakeholders. Internal stakeholders include all employees working within the company, while external stakeholders include residents of nearby settlements, government agencies, subcontractors, suppliers, customers, associations, and non-governmental organizations. Stakeholders are listed in Section 6.

Hasan Basri Taşkin, Director of Energy and Sustainability, was appointed as the Stakeholder Engagement Plan Manager to ensure compliance with the stakeholder engagement principles of the IFC Performance Standards within ASAŞ. Stakeholder identification, communication methods, and performance audits are covered in the following sections.

ASAŞ will ensure that all affected parties, particularly affected settlements, local communities, neighboring facilities, and surrounding government agencies, are informed about the Facility. These groups will be involved in identifying key issues within the Facility. The key roles and responsibilities defined for effective stakeholder engagement at the Facility are listed in Table 3-1. The Stakeholder Engagement Plan organizational chart is in Annex 7, and the responsible parties Table 3-2.

Table 3-1 Basic Duties and Responsibilities

Duty	Responsibilities
Board of Directors	Ensures the implementation of the Stakeholder Engagement Plan Provides the necessary resources for the effective implementation of this plan
Internal Audit	Ensures the implementation of the Stakeholder Engagement Plan Conducts internal audit for effective implementation of this plan.
Stakeholder Engagement Plan Manager	Ensures the implementation of the Stakeholder Engagement Plan Provides the necessary resources for the effective implementation of this plan Provides the necessary coordination between the parties for the implementation of the plan
Stakeholder Engagement Plan Officers	Implementation and development of the Stakeholder Engagement Plan

Duty	Responsibilities
	<p>Determine the resources required for the effective implementation of the Stakeholder Engagement Plan and present them to department managers.</p> <p>Evaluation of the compliance of facility activities with national and international legislation</p> <p>Developing and publicizing Complaint Management procedures</p> <p>Collecting complaints from local people, the public, non-governmental organizations and related groups as a contact person Forwarding incoming complaints to relevant parties</p> <p>Receiving, examining, investigating and following up on complaints</p> <p>Directing incoming complaints to relevant units for resolution</p> <p>Implementation, monitoring and evaluation of the regulations within the scope of the complaints procedure</p> <p>Regular review of the Grievance Mechanism as a result of changes in employment legislation and lessons learned from the operation of the Facilities</p> <p>Communicating the Grievance Mechanism to all subcontractor employees through communication channels</p> <p>Ensuring that the Grievance Mechanism is a featured topic during new employee orientation</p> <p>Providing confidential advice to workers when employees are reluctant to meet with supervisors or subcontractor management to resolve issues they are experiencing.</p> <p>Providing advice and support to Subcontractor supervisors and managers on their duties and responsibilities for the successful implementation and operation of the Grievance Mechanism</p> <p>Reporting Progress Reports to external stakeholders to maintain effective stakeholder engagement</p> <p>Implementation of Good Industry Practices</p> <p>Continuing interaction with stakeholders by implementing social investment projects to avoid negative social impacts and create positive public perception about ASAŞ</p>

Table 3-2 Stakeholder Engagement Plan Officers

Stakeholder Engagement Plan Manager	:	Hasan Basri TAŞKIN (Energy and Sustainability Director)
Corporate Development and Risk Officer	:	Semih ÇETİN (Corporate Development Manager)
Environmental Officer	:	Fatih Kürşat KÜÇÜKALİ (Environmental Manager)
OHS Officer	:	Selçuk BAYSAL (Occupational Safety Manager)
Human Rights Officer	:	Tuba ALTUNOĞLU (Organizational Development Manager)
Corporate Communications Officer	:	Demet İNCİRCİ (Marketing, Corporate Communications Group Manager)
• Life Manager at ASAS	:	Sedef ÇİFTÇİ (Corporate Communications Senior Specialist)
• Internal Stakeholder Communication and Training Officer	:	Sedef ÇİFTÇİ (Corporate Communications Senior Specialist), Tuba ALTUNOĞLU (Organizational Development Manager)
• Corporate External Stakeholder Officer	:	Sedef ÇİFTÇİ (Corporate Communications Senior Specialist)
• Local Community External Stakeholder Officer	:	Erdal KURT (Administrative Affairs Manager)
Employee Representative Officer	:	Hakan SALİM (Human Resources Group Manager)
SEP Organization Manager	:	Onur ÇELİK (Data Entry and Field Staff)
Complaint Mechanism Officer	:	Zeynep TÜRKYILMAZ TÜRK (Employee Relations Senior Specialist)
• Internal Complaints Officer	:	Zeynep TÜRKYILMAZ TÜRK (Employee Relations Senior Specialist)
• External Complaints Officer	:	Erdal KURT (Administrative Affairs Manager), Gülşah ŞİMŞİR (Administrative Affairs Assistant Specialist)
• Ethics Line Officer	:	Ali Nadir ERTÜRK (Internal Audit Manager)
Investment and Public Affairs Officer	:	Recep ANAHAR (Al. Profile Invest. Business Rights & Public Relations Directorate)

4 STAKEHOLDER ENGAGEMENT PLAN: OBJECTIVES AND DEFINITION

The fundamental aims of the SEP are explained below in bullet points .

- To assist ASAŞ in identifying the stakeholders of its facilities and to enable it to establish and maintain constructive relationships with these stakeholders.
- To assess the level of stakeholder interest and support for the project and to ensure that stakeholder views are reflected in the project design and environmental and social (E&S) performance.
- To encourage effective and inclusive participation of stakeholders throughout the project and to offer methods to ensure this participation.
- To ensure that technically and culturally relevant project information regarding environmental and social risks and impacts is made public in a timely, understandable, and accessible format.
- To provide accessible and inclusive channels for those affected by the project to voice their views, concerns, and complaints, and to enable ASAŞ to manage and respond to these complaints.

Prepared in line with the objectives described above, the SEP consists of the following sections.

- i. Introduction / Project Description: This overview describes ASAŞ facilities, their location, and sphere of influence.
- ii. Legal Framework: Explains national and international legislation and standards.
- iii. Roles and Responsibilities in Implementing Stakeholder Engagement Activities: It describes the basic duties and responsibilities.
- iv. SEP's Purpose/Definition: This section describes the purpose, scope, requirements, and implementation of the SEP, and also provides basic definitions.
- v. Stakeholder Identification and Analysis: Identifies affected and relevant parties, including vulnerable groups, and assesses their impact on the project.
- vi. Stakeholder Engagement Program: Details completed and planned stakeholder engagement activities, communication methods, and feedback mechanisms.
- vii. Corporate Social Responsibility Projects: ASAŞ describes the Corporate Social Responsibility (CSR) Projects it has carried out to date.
- viii. Complaints Mechanism: Describes national and project-level complaints processes, including worker-specific mechanisms.
- ix. Monitoring and Reporting: This explains how the implementation of the SEP, participation activities, and complaints will be monitored and reported.

5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Methodology

Stakeholder engagement methodology, IFC Performance Standard 1, IFC's Stakeholder Engagement: A Good Practice This methodology is designed based on handbook guidelines and international best practices. It aims to ensure an effective, transparent, inclusive, and continuous participatory process throughout the entire project lifecycle. The following fundamental principles have been adopted:

Transparency and Lifecycle Approach

Stakeholder engagement is a dynamic and continuous process that will be carried out throughout all phases of the project, including design, construction, operation, and closure.

In line with this approach:

- Public consultation meetings will be held regularly.
- Clear, understandable, and comparable information will be provided to all stakeholders.
- The process will be structured in such a way that it does not involve any risk of external pressure, manipulation, intimidation, or retaliation.

Providing information in a timely manner is critical for stakeholders to develop perspectives and make meaningful contributions to decision-making processes.

Informed Participation and Feedback

Relevant informational materials to enable stakeholders to make informed assessments of the project:

- In the appropriate format,
- In the local language and appropriate to the cultural context,
- In non-technical, easy-to-understand language.

It will be prepared and shared.

Methods include public meetings, focus group discussions, one-on-one interviews, digital platforms, and written materials.

The participation process includes not only information sharing but also an active feedback mechanism. All stakeholders will be given the opportunity to express their views, voice their concerns, offer suggestions, and discuss alternatives. The feedback received will be recorded, analyzed, and integrated into project designs as needed.

Inclusion and Sensitivity

Ensuring that the participation process is accessible to all stakeholders is a fundamental requirement of the IFC. Therefore, participation methods will be tailored to the social, economic, and cultural characteristics of each stakeholder.

Within the framework of the principle of inclusion:

- All stakeholders will have equal access rights.
- Meeting and consultation methods will be diversified according to the needs of stakeholders.
- Special measures will be taken to reduce geographical, social, cultural and economic barriers.

For vulnerable groups (women, the elderly, people with disabilities, displaced communities, migrant workers, diverse ethnic groups, etc.):

- Separate focus group studies can be organized,
- Home visits or small group meetings in safe locations can be held,
- Translation and simplified information materials can be prepared to overcome language and literacy barriers.
- Participation programs can be structured while taking cultural norms and sensitivities into account.

This approach aims to reduce the risk of exclusion and ensure meaningful participation for all.

Flexibility

In-person participation may not always be possible due to social distancing requirements, local cultural norms, security concerns, or the risk of retaliation. In these cases, participation processes will be redesigned in a flexible and adaptable manner.

The following are alternative methods that can be applied:

- Internet-based meetings (online sessions)
- Telephone calls or message-based communication
- Community-focused tools such as radio, local media, and bulletin boards.
- Widespread distribution of simplified and visually-oriented informational materials.

This flexibility ensures that stakeholder engagement continues uninterrupted, safely, and effectively.

This methodology provides a systematic framework, aligned with IFC standards, that enables stakeholders to participate actively, informedly, safely, and equally in all phases of the project. The participation process is viewed as a living mechanism and can be updated throughout the project based on feedback from stakeholders.

5.2 Facility Stakeholders

The purpose of stakeholder identification is to determine which stakeholders may be directly or indirectly affected – positively or negatively – or who may have a relationship with the Facilities (interested parties).

According to the IFC Handbook, stakeholders are “individuals or groups who are directly or indirectly affected by a project, as well as those who are likely to positively or negatively impact its production.” Stakeholder engagement criteria vary for each project. Many factors, such as the location of the project/facility, the cultural characteristics of the area, and the facility's field of activity, are used as criteria in determining stakeholders. Stakeholders should initially be identified by the project owner. It is not always possible for the public to know whether or not they will be affected by the facility. However, new stakeholders may be added to those initially identified throughout the facility's lifespan.

External stakeholders may include individuals from locally affected communities, their formal or informal representatives, and opinion leaders. They may act as representatives in public consultations. In addition, suppliers, subcontractors, customers, local governments, state agencies, vocational schools, industrial zone management, civil society organizations, academic communities, and neighboring facilities should also be identified as stakeholders of the facilities. ASAŞ will have an obligation to announce all activities concerning its stakeholders throughout the facility's lifespan. As a dimension of the human rights principle, it will respond to complaints, suggestions, and requests for information from outside.

Internal stakeholders include workers at every level employed at the facility. ASAŞ has certain responsibilities towards all its employees. These responsibilities begin with the incomplete implementation of what is written in Turkish legislation. In addition, as stated in PS-2, it aims to treat all employees fairly, ensure the sustainable improvement of employee-management relations, protect vulnerable groups such as child labor and migrant workers, create safe and healthy working conditions, and develop practices that avoid forced labor. It will also demand and monitor compliance with these principles, which include human and worker rights, from the companies it works with.

ASAŞ will establish a mechanism to enable the participation of all stakeholders and will use all possible communication channels to announce this. However, it is still not possible to reach all stakeholders equally. A crucial point in this regard is reaching people belonging to vulnerable groups. ASAŞ will conduct a vulnerable group screening for both internal and external stakeholders. Erdal KURT, the External Stakeholder Communication Officer, will be responsible for this screening. This is because people from vulnerable groups are more likely to suffer from the potential negative impacts of the facility. Direct communication with these individuals will be conducted in facility-related activities and stakeholder participation meetings that may have an impact on the public.

According to IFC guidelines, the characteristics of individuals included in vulnerable groups are as follows:

- Refugees,
- Indigenous minority groups,
- Those over 70 years old who live alone,
- People with physical or mental disabilities,
- Those with chronic illnesses or who are bedridden,
- Female heads of households,
- Poor people who live on state or association aid,
- Individuals who are economically dependent on unique natural resources,
- Villagers who do not own land and work daily on the lands of others.

It is important to recognize that disadvantaged and vulnerable groups affected by facility operations may have difficulty participating in the stakeholder engagement process, and to make a special effort to overcome this. The Stakeholder Engagement Plan considers whether a person or group may be directly or indirectly affected by the facility when defining a stakeholder. In addition, other individuals and groups involved with or impacting the facilities are also included in the plan.

The stakeholder identification process continues throughout the life of the Facility. It requires regular review and updating. Since stakeholder identification is an ongoing process, different stakeholders are involved in different areas. Therefore, stakeholders can be classified according to their connection to the Facility. Understanding a stakeholder group's connection to the Facility helps determine the fundamental objectives of stakeholder engagement. Interested and affected stakeholders within the scope of the project are shown in Table 5-1.

Table 5-1 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
Local People		
<ul style="list-style-type: none"> • Local kindergartens, primary schools, middle schools, and high schools • Yazılıgürgen and Küçücek İstiklal Village Heads and Neighborhood Residents • Neighboring facilities in Sakarya Küçücek Organized Industrial Zone 	√	
ASAS Employees		
<ul style="list-style-type: none"> • Partners (Shareholders) • Senior Management • Facility Staff 	√	
Public Administration Units		
<ul style="list-style-type: none"> • Ministry of Energy and Natural Resources • Ministry of Labor and Social Security • Ministry of Transport and Infrastructure • Ministry of Environment, Urbanization and Climate Change • Ministry of Treasury and Finance 		√

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<ul style="list-style-type: none"> Akyazı and Karapürçek District Governorships Sakarya Governorship Sakarya Provincial Directorate of Environment, Urban Planning and Climate Change Sakarya Provincial Health Directorate Sakarya Chamber of Commerce and Industry Akyazı and Karapürçek District Health Directorates Ministry of Industry and Technology Turkish Employment Agency (İŞKUR) Organized Industrial Zones Supreme Organization (OSBÜK) 		
Educational Units		
<ul style="list-style-type: none"> Sakarya University Sakarya University of Applied Sciences Vocational High Schools in Akyazı and Karapürçek Districts 	√	
Health Units		
<ul style="list-style-type: none"> Sakarya University Training and Research Hospital 	√	
Municipalities		
<ul style="list-style-type: none"> Akyazı Municipality Karapürçek Municipality Sakarya Metropolitan Municipality 	√	
Village Head Offices		
<ul style="list-style-type: none"> Yazılıgürgen and Küçücek İstiklal Village Headships 	√	
Raw material and service providers in the supply chain, buyers in the market, and other projects/facilities/firms/customers producing and/or selling in similar sectors.		
	√	
Non-Governmental Organizations (NGOs)		
		√
Associations and Memberships*		
<ul style="list-style-type: none"> Aluminum Stewardship Initiative Sustainable Development Association Türkiye Cepheder (Frontline Industry and Business People Association) ECOVADIS Saha Istanbul (Defense, Aviation and Space Cluster Association) UN GLOBAL 		√
Standards-setting organizations (ISO, TSE, DIN, RAL, etc.)		
		√
Banks		
		√
Insurance		
		√
Chambers of Industry and Commerce		
		√
Customs Brokers		
		√
Disadvantaged, Vulnerable and Vulnerable Groups		
	√	
Media		
		√

Source: ASAŞ GN-LS1015 Relevant Parties Document

* In the ASAŞ KIM-LS01_0 Association Membership List document, associations with active membership have been selected.

5.3 Affected Parties and Other Relevant Parties

The boundaries of the Environmental Impact Assessment (EIA) for ASAŞ facilities have been determined by considering their environmental and social aspects. A distance with a radius of

1 km has been defined as the primary impact zone where potential environmental and social impacts will be directly concentrated. The Impact Zone Map is shown in Section 1.4, Figure 1-3 result of the assessment of the potential impacts of the facilities, and it is understood that the majority of the impacts will be concentrated within this area. It is anticipated.

Project-Affected Individuals (PAIs) include local communities, community members, and other parties who may be directly affected by the facilities.

The stakeholders of these facilities are not limited solely to the directly affected communities. They also include other relevant parties (RTPs) such as Public Administration Units, Non-Governmental Organizations (NGOs), Associations, Memberships, Standard-Setting Institutions (ISO, TSE, DIN, RAL, etc.), Banks, Insurance Companies, Chambers of Industry and Commerce, Customs Brokers, and the Media.

5.4 Vulnerable/Disadvantaged Individuals or Groups

The boundaries of the Environmental Impact Assessment (EIA) area have been determined taking into account the environmental and social aspects of the ASAŞ facilities. This area encompasses the ASAŞ facility sites, the surrounding settlements (Küçücek İstiklal Neighborhood in Akyazı District and Yazılıgürgen Neighborhood in Karapürçek District), and the access roads to the facilities.

Based on interviews with local village heads and community representatives, no immigrant households were identified in Küçücek İstiklal Neighborhood in Akyazı District and Yazılıgürgen Neighborhood in Karapürçek District.

Additionally, no approximately low-income households relying on government assistance or informal support for their livelihood were identified. The assessment did not include individuals requiring special care, such as elderly individuals living alone or individuals with physical or mental disabilities.

This data is based on face - to - face interviews conducted during fieldwork and consultation meetings held at neighborhood centers.

Approximately 27,090 children have been recorded within the affected population (according to Turkish Statistical Institute 2024 data, 0-18 years old: Akyazı; 24,390, Karapürçek; 3,700), highlighting the importance of implementing additional protective measures.

Also 65 years old A total of 13,227 people (according to Turkish Statistical Institute 2024 data, 65-90+ age group: Akyazı; 11,666, Karapürçek; 1,561 people) have been identified.

6 STAKEHOLDER ENGAGEMENT PROGRAM

6.1 Summary of Completed Stakeholder Engagement Activities

2021, ASAŞ commissioned the preparation of an Environmental and Social Management Plan (ESMP) in accordance with the International Finance Corporation's (IFC) Performance Standards (PS), the Asian Infrastructure Investment Bank's (AIIB) Environmental and Social Standards (ESS), and National Legal Requirements, due to its potential search for financing from the Turkish Development and Investment Bank (TKYB) for the existing facility. To date, ASAŞ has prepared a Stakeholder Engagement Plan (SEP) in accordance with the IFC's Performance Standards and the AIIB's Environmental and Social Standards (ESS) (January 2021) ⁵, which was subsequently revised (August 2022) ⁶. ASAŞ's Stakeholder Engagement Plans are available on its official website .

6.2 Summary of Methods , Tools , and Techniques for Stakeholder Engagement

A range of tools and methods have been and will continue to be used for stakeholder engagement within the scope of the project. To ensure efficient and effective stakeholder engagement throughout the project's lifecycle, existing communication mechanisms, as well as new ones deemed appropriate, will be incorporated into the process.

The methods used to communicate with stakeholders are presented below:

- Formal and informal face-to-face meetings (individual and collective) will likely be the primary form of consultation throughout the Project's lifespan. This also includes stakeholder meetings planned by the Project or requested by stakeholders.
- ASAŞ website – publicly available project announcements, documents, reports, etc.
- The grievance mechanism – specifically targets directly affected stakeholders. Details of this mechanism have been and will continue to be presented to stakeholders in the impact area.
- Media promotions – sharing information through newspapers, magazines, industry publications, etc.
- Social media channels – LinkedIn , Instagram, X, YouTube , Hayat ASAŞ platform.
- Meetings and discussions – gatherings arranged at specific intervals or spontaneously on-site.
- ASAŞ Academy activities include organizing field events and trade fairs.

⁵ <https://www.asastr.com/sites/1/upload/files/PKP-2189.pdf>

⁶ https://www.asastr.com/sites/1/upload/files/PKP_2022_Rev01-2262.pdf

6.3 Stakeholder Engagement Plan

Stakeholder engagement will continue throughout the life of the Facilities. Key stakeholders will be informed about the operations of the Facilities. They will have the opportunity to provide feedback on the effectiveness of remedial and improvement measures, and to raise any issues or complaints.

The information to be shared in connection with the implementation of this Report will include the following:

- Impacts identified within the scope of the project
- Project impacts and ongoing mitigation or remediation methods
- Duties and responsibilities
- Monitoring and management methods
- Information about the Grievance Mechanism for the project.

To ensure effective stakeholder engagement, the following measures will be considered by the Project Company:

- The Stakeholder Engagement Plan will be shortened and turned into a brochure, which will be distributed to all affected neighborhoods and relevant stakeholders.
- The Stakeholder Engagement Plan will be reviewed annually by the responsible manager.
- ASAŞ will take this plan into account when communicating with affected stakeholders and other relevant parties.

Those responsible for the Facility's Stakeholder Engagement Plan will be accountable for engaging with stakeholders as an ongoing process throughout the Facility's lifecycle. Complaints can be an indicator of growing stakeholder concerns (real and perceived) and may escalate if not identified and resolved. Identifying and resolving complaints will foster the development of positive relationships between the Facilities and stakeholders in their impact area.

ASAŞ has officially established an internal Complaints/Suggestions Mechanism. This will provide a formal and continuous way for stakeholders to interact with the Facility. With the implementation of this plan, this formal complaints mechanism, created free of charge for internal/external stakeholders, will not preclude access to other legal or administrative remedies.

Internal and external stakeholders will be able to share their opinions and complaints through a range of options including ASAŞ's website, QR code, suggestion/complaint/suggestion box,

	ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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mail, and face-to-face meetings, as part of the implementation of the Stakeholder Engagement Plan. The Stakeholder Engagement Monitoring Program can be developed according to ASAŞ's needs, as shown in Table 6-1 below.

Table 6-1 Stakeholder Engagement Monitoring Program

Stakeholder Groups	Scope	Frequency	Methods and Tools
<p>Local People</p> <ul style="list-style-type: none"> Local kindergartens, primary schools, middle schools, and high schools Yazılıgürgen and Küçücek İstiklal Village Heads and Neighborhood Residents Sakarya Küçücek Organized Industrial Zone 	<ul style="list-style-type: none"> Recruitment Process Social Responsibility Projects Updating facility activities and progress upon request. Organizing explanatory meetings regarding public complaints, requests, and feedback. Monitoring public safety and security through effective and applicable stakeholder engagement. 	For 6-month/annual needs.	<p>Printed brochures and posters Website Official social media accounts Information, Telephone Calls, Grievance Mechanism</p>
<p>ASAŞ Employees</p> <ul style="list-style-type: none"> Partners (Shareholders) Senior Management Facility Staff 	<ul style="list-style-type: none"> Monthly review of Grievance Mechanism applications in the facility area. 	Continually	<p>Email to all employees: Virtual meetings Teleconferencing ASAŞ websites Written updates Notice boards In-depth discussions Focus group meetings</p>
<p>Public Administration Units</p> <ul style="list-style-type: none"> Ministry of Energy and Natural Resources Ministry of Labor and Social Security Ministry of Transport and Infrastructure Ministry of Environment, Urbanization and Climate Change Ministry of Treasury and Finance Akyazı and Karapürçek District Governorships Sakarya Governorship Sakarya Provincial Directorate of Environment, Urbanization and Climate Change Sakarya Provincial Health Directorate Sakarya Chamber of Commerce and Industry 	<ul style="list-style-type: none"> Updating facility activities and progress upon request. Organizing explanatory meetings regarding public complaints, requests, and feedback. Local purchasing and employment data. 	Annual If needed	<p>Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism</p>



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



<ul style="list-style-type: none">•Akyazı and Karapürçek District Health Directorates•Ministry of Industry and Technology•Turkish Employment Agency•Organized Industrial Zones Supreme Organization			
Educational Units <ul style="list-style-type: none">• Sakarya University• Sakarya University of Applied Sciences• Vocational High Schools in Akyazı and Karapürçek Districts	<ul style="list-style-type: none">•Updating facility activities and progress upon request.	If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism University days Open house events
Health Units <ul style="list-style-type: none">• Sakarya University Training and Research Hospital	<ul style="list-style-type: none">•Updating facility activities and progress upon request.	If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism Open house events
Municipalities <ul style="list-style-type: none">•Sakarya Metropolitan Municipality•Akyazı and Karapürçek Municipalities	<ul style="list-style-type: none">•Updating facility activities and progress upon request.•Organizing explanatory meetings regarding public complaints, requests, and feedback.•Local purchasing and employment data	6- Monthly/Annual If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism
Village Head Offices <ul style="list-style-type: none">•Yazılıgürgen and Küçücek İstiklal Village Headships	<ul style="list-style-type: none">•Organizing explanatory meetings regarding public complaints, requests, and feedback.	6- Monthly/Annual If needed	Teleconference Virtual meetings Printed brochures and posters



**ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN**



			Website Information Telephone Calls Grievance Mechanism
/customers producing and/or selling in similar sectors.	<ul style="list-style-type: none"> •Updating facility activities and progress upon request. •Local purchasing and employment data •The impact of changes in the project •Changes regarding facility/company employee rights. •Information about working hours and shift system. •Information about preventing forced labor and child labor. •Information about harassment and discrimination in the workplace. •Providing information about gender-based discrimination and harassment in the workplace. 	6- Monthly/Annual If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism
Civil Society Organizations (NGO)	<ul style="list-style-type: none"> •Updating facility activities and progress upon request. 	If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism
Associations and Memberships <ul style="list-style-type: none"> •Aluminum Stewardship Initiative •Sustainable Development Association Turkey •Cepheder (Frontline Industry and Business People Association) •ECOVADIS •Saha Istanbul (Defense, Aviation and Space Cluster Association) •UN GLOBAL 	<ul style="list-style-type: none"> •Updating facility activities and progress upon request. 	If needed	Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



<p>Standard-setting organizations (ISO, TSE, DIN, RAL, etc.) , banks, insurance companies, chambers of industry and commerce, customs brokerage firms.</p>	<p>•Updating facility activities and progress upon request.</p>	<p>If needed</p>	<p>Teleconference Virtual meetings Printed brochures and posters Website Information Telephone Calls Grievance Mechanism</p>
<p>Disadvantaged, Vulnerable and Vulnerable Groups</p> <ul style="list-style-type: none"> •People and families with low incomes •Men and women with low levels of education and/or who are illiterate •Men and women with physical and/or mental disabilities •Older men and women •Women who are the sole heads of household •Minorities, asylum seekers and refugees 	<p>•Updating facility activities and progress upon request.</p>	<p>6- Monthly/Annual If needed</p>	<p>Website Information Telephone Calls Grievance Mechanism Special meetings and consultations for disadvantaged groups. Printed and written documents should be inclusive, meaningful, and clear.</p>
<p>Media</p>	<p>•Updating facility activities and progress upon request.</p>	<p>If needed</p>	<p>Printed brochures and posters Website Information Telephone Calls Grievance Mechanism Open house events</p>

Source: ASAŞ GN-LS1015 Relevant Parties Document

6.4 Stakeholder Feedback Process

ASAŞ invites its stakeholders to actively participate in making this Environmental and Social Impact Assessment (EIA) an interactive and dynamic document. Currently, training is being provided to personnel within the scope of EIA tasks and responsibilities to ensure they have the necessary knowledge and skills for managing environmental and social impacts, and assessments are being conducted to ensure effective EIA management.

Stakeholder engagement is an inclusive process conducted throughout the project lifecycle, fostering strong, constructive, and responsive working relationships crucial for the successful management of the project's environmental and social impacts and risks. Stakeholder Engagement Meetings help manage stakeholder expectations that could impact the management of risks, potential disputes, and project delays by ensuring early, frequent, and open communication throughout the project's lifecycle.




Stakeholder consultation meetings have been organized to provide information on the technical, social, and environmental details of the current project by relevant experts, to answer any questions participants may have about the project, and to gather their opinions. A stakeholder participation meeting will also be held at the facility. These meetings were held after ÇEVTAŞ approved the draft version of the Project Management Plan and published it on ASAŞ's official website (<https://www.asastr.com/>).

The meetings were organized to provide information by relevant experts on the technical, social, and environmental details of the existing facilities, to answer any questions participants may have about the facilities and to gather their opinions, and to inform them about the Complaints Mechanism.

Furthermore, a video prepared for the purpose of informing 2,931 employees (internal stakeholders) currently working within ASAŞ about SEP and Grievance Mechanism issues was sent on January 20, 2026. This video will remain actively accessible in the personnel's task lists until the end of the year. As of February 20, 2026, over 1,000 personnel have watched the video and participated in the information process. The information video is included in Appendix 9.

The summary information of the Stakeholder Consultation Meeting is in Table 6-2 and its content and records are in Appendix 7.

Table 6-2 Stakeholder Consultation Meetings (2025)

Stakeholder	Meeting Date/Time	Photos
Sakarya Provincial Directorate of Environment, Urbanization and Climate Change, Environmental Impact Assessment Branch	16.09.2025/ 14:00	No photographs were taken during the meeting.
Sakarya Metropolitan Municipality Environmental Protection and Control Directorate	16.09.2025/ 16:00	No photographs were taken during the meeting.
Akyazı Municipality (Mehmet ÖZTÜRK)	17.09.2025/ 10:00	
Küçükçek Neighborhood (Ismail BARUT)	17.09.2025/ 13:00	
Yazılıgürgen Neighborhood Headman	17.09.2025/ 14:00	No photographs were taken during the meeting.
Harmanlı Neighborhood Headman	17.09.2025/ 15:00	No photographs were taken during the meeting.
Local People of Yazılıgürgen and Kızılbayır Neighborhoods	18.09.2025/ 10:00	

ASAS

18.09.2025/ 14:00



6.5 Potential Social Impacts and Mitigation Measures

Potential social impacts are determined according to IFC PS-1, 2, 4, 5 and 8 principles.

ASAŞ facilities increase employment expectations in local communities. However, these expectations are not always met; while qualified positions are given to workers from outside, locals are often directed to low-paying and short-term jobs. This can lead to a deepening of social inequalities and dissatisfaction within the community. Furthermore, the lack of protection for workers' rights, long shifts, inadequate housing conditions, or the suppression of unionization rights can create tension in employer-employee relations.

Land acquisition and the impact on livelihoods are another critical dimension of the project. If the area allocated for the facility is agricultural or forested land, the livelihoods of the local population will be directly harmed. Inadequate or delayed compensation has serious negative consequences, especially for vulnerable groups such as women, the poor, and the elderly. Restricting communities' access to agricultural production and natural resources can lower their living standards and weaken social cohesion.

The facility's operations are increasing the influx of labor into the area. This has the potential to put pressure on housing, healthcare, infrastructure, and social cohesion. The labor influx could lead to increased rent, social tensions, gender-based violence, or the spread of sexually transmitted diseases. The use of heavy vehicles for facility logistics increases the risk of traffic accidents on local roads, while the presence of security forces could lead to human rights violations in cases of miscommunication or disproportionate use of force.

Facility operations are considered a risk in terms of cultural heritage and community identity. Damage to sacred sites, cemeteries, or areas of high symbolic value to the community by logistical routes or the facility itself can have lasting effects on community identity. Furthermore, the influx of new populations and changes in the economic structure of the region can weaken traditional social structures and create cultural erosion.

From the perspective of vulnerable groups, women and young people are often employed in low-wage jobs and are disproportionately affected by the loss of livelihoods. Individuals with disabilities and the elderly may be overlooked in employment and compensation processes. Individuals belonging to vulnerable groups may have difficulty participating in consultation activities and may be disproportionately affected by facility operations.

Finally, the effectiveness of stakeholder engagement and grievance mechanisms plays a decisive role in the social acceptance of facilities. Non-transparent communication processes create distrust, while inadequate or inaccessible grievance mechanisms can lead communities to express their problems through informal channels. Therefore, the success of stakeholder

engagement depends not only on its technical capacity but also on the operation of an inclusive, continuous, and trust-based stakeholder engagement process.

A mitigation plan to manage the potential impacts mentioned above is presented below.

Table 6-3 Mitigation for Managing Potential Impacts

Effects / Risks	Potential Results	Mitigation Measures	Related IFC Performance Standard	Reference Management Plan
Employment expectations not being met	Dissatisfaction in the local community, social unrest	Determination of local employment quotas, transparent recruitment criteria, vocational training programs	PS2	Stakeholder Engagement Plan (SEP)
The predominance of temporary and low-wage jobs	Local people's sense of exclusion and inequality	Capacity building, internship and skills development programs for qualified positions for local people	PS2	Stakeholder Engagement Plan (SEP)
Land acquisition and loss of livelihoods	Decrease in agricultural production and income sources	Fair and timely compensation, livelihood reconstruction programmes, additional support for vulnerable groups	PS5	Stakeholder Engagement Plan (SEP)
Damage to cultural heritage	Weakening of identity and cultural ties, social conflict	Conducting FPIC (Free, Prior and Informed Consent) processes with indigenous peoples, avoiding sacred sites, joint cultural heritage management plans	PS7 & PS8	Cultural Heritage Management Plan (CHM)-Finding Procedure (FP)
Labor influx	Infrastructure pressure, rent increases, social tensions, GBV/SEA risks	Regular management of labor camps, coordination with local service providers, GBV prevention training, community adaptation programs	PS1 & PS4	Workforce Management Plan (WMP), Community Health and Safety Management Plan (CHSMP)
Public health and safety risks	Traffic accidents and workplace accidents are reflected in communities.	Traffic Management Plan, community information campaigns, emergency preparedness plans	PS4	Community Health and Safety Management Plan (CHSMP)
Presence of security personnel	Risk of human rights violations	Human rights training for security forces, access to complaints mechanisms, regular dialogue with the community	PS4	Community Health and Safety Management Plan (CHSMP)
Exclusion of vulnerable groups (women, youth, people with disabilities)	Inequality in compensation and employment opportunities	Equal opportunity policy, gender and inclusion focused programs, special support for women and young entrepreneurs	PS1 & PS2	Stakeholder Engagement Plan (SEP), Sexual Exploitation and Abuse Protection

	ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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				Plan (SE/APP).
Inadequacy of the Grievance Mechanism	Protest, road closure, loss of social license	Establishing an accessible, culturally appropriate and reliable grievance mechanism and providing regular feedback	PS1	Stakeholder Engagement Plan (SEP)

In addition to the Stakeholder Engagement Plan, sub-management plans prepared to assess potential impacts and risks are listed below:

- Workforce Management Plan (WMP);
- Traffic Management Plan (TMP);
- Cultural Heritage Management Plan (CHM);
- Community Health and Safety Management Plan (CHSMP);
- Sexual Exploitation and Abuse Protection Plan (SE/APP).

7 CORPORATE SOCIAL RESPONSIBILITY PROJECTS

Corporate Social Responsibility (CSR) projects are one of the most important tools implemented, especially during stakeholder engagement activities at the corporate level. CSRs ensure the accountability, transparency, and sustainability of the company and the project, while also supporting affected local communities and local government entities. To date, ASAŞ has undertaken the following activities:

- **ASAŞ Basketball Club**

Founded on the belief that making a positive impact on the lives of children in the region through sports and education is the most valuable investment in human resources for the future, this basketball school trains athletes.

The aim is to raise children to be more successful individuals in life by fostering socialization through a love of sports, keeping them away from bad habits, promoting discipline, and promoting healthy living.

ASAŞ Basketball Club is participating with a total of 7 teams: U10, U11, U12, U14, and U16 teams for girls, and U16 and U18 teams for boys.



Photo 7-1 ASAŞ Basketball Club Events (Men's)

Note: Photo Clarity Has Been Intervened Within the Scope of Personal Data Protection Law



Photo 7-2 ASAŞ Basketball Club Events (Girls)

Note: Photo Clarity Has Been Intervened Within the Scope of Personal Data Protection Law

- **A Golden Ball for Every Nest**

The "Golden Ball for Every Home" project covers the in-vitro fertilization (IVF) expenses of ASAŞ employees who wish to experience the joy of parenthood each year. To date, many prospective mothers and fathers have been supported.



Figure 7-1Golden Ball for Every Nest Project Poster

Note: Poster image with the slogan Miracles Are Meant to Happen

- **TEMA Foundation Sapling Donation**

A sapling donation is made to the TEMA Foundation on behalf of newly hired white-collar employees. Certificates for the donated saplings are also included in the Welcome Kits given to new employees.

- **Environment Day Activities**

As part of World Environment Day on June 5th, ASAŞ planted saplings to increase green areas and contribute to the environment.

Küçücek Stream, which runs through our factory campus boundaries, we contributed to the improvement of the streambed. ASAŞ also contributed to the environment by cleaning the solid waste found on the roads around it.



Photo 7-3 Environment Day Activities

- **ASAŞ ART**

ART to expand and consolidate its support for the arts, bringing together artists, academics, and students to foster synergistic learning, design, and production processes. ASAŞ ART also organizes courses and seminars for the spouses and children of all ASAŞ employees, aiming to support the transformative power of art in societies and the development of diverse perspectives within its own organization.



Figure 7-2 Art Project

- **Bicycle-Friendly Employer Practices**

As part of its sustainability efforts, ASAŞ has received the CFE-approved Gold Level Bicycle-Friendly Employer Certificate by promoting the use of bicycles, an environmentally friendly mode of transportation, to reduce its carbon footprint. ASAŞ is the second Turkish employer to receive this certificate. In addition to providing 320 bicycles for employee use and numerous parking spaces spread across the campus, the 8 km bicycle path constructed on campus has facilitated transportation between the factory's production facilities. ASAŞ is also continuing its efforts to connect bicycle transportation to the Akyazı district, in collaboration with relevant institutions, to support employees who wish to commute to work by bicycle.



Photo 7-4 Bicycle-Friendly Employer Practices

- **Energy Saving Week Events**

In line with its principle of efficient and sustainable work, ASAŞ analyzes the energy performance of all its processes through its Energy Committees and develops projects that will use its resources more efficiently. As part of the Energy Saving Week Activities from January 11-18, an energy saving quiz was organized across the factory on an online platform accessible to participants via telephone.



Photo 7-5 Energy Saving Week Events

- **Science and Technology Week Events**

As part of the Science and Technology Week from March 10-12, ASAŞ visited Akyazı Altındere Mehmet Akif Primary School and provided training. The training was supported by interactive experimental activities.



Photo 7-6 Science and Technology Week Events

Note: Photo Clarity Has Been Intervened Within the Scope of Personal Data Protection Law

- **Forest Week Activities**

ASAŞ participated in the tree planting event organized by the Sakarya General Directorate of Forestry in Kaynarca as part of the March 21 Forestry Week.



Photo 7-7 Forest Week Activities

- **World Water Day Events**

ASAŞ has conducted an awareness and information campaign within its factory to remind people of the value of water.

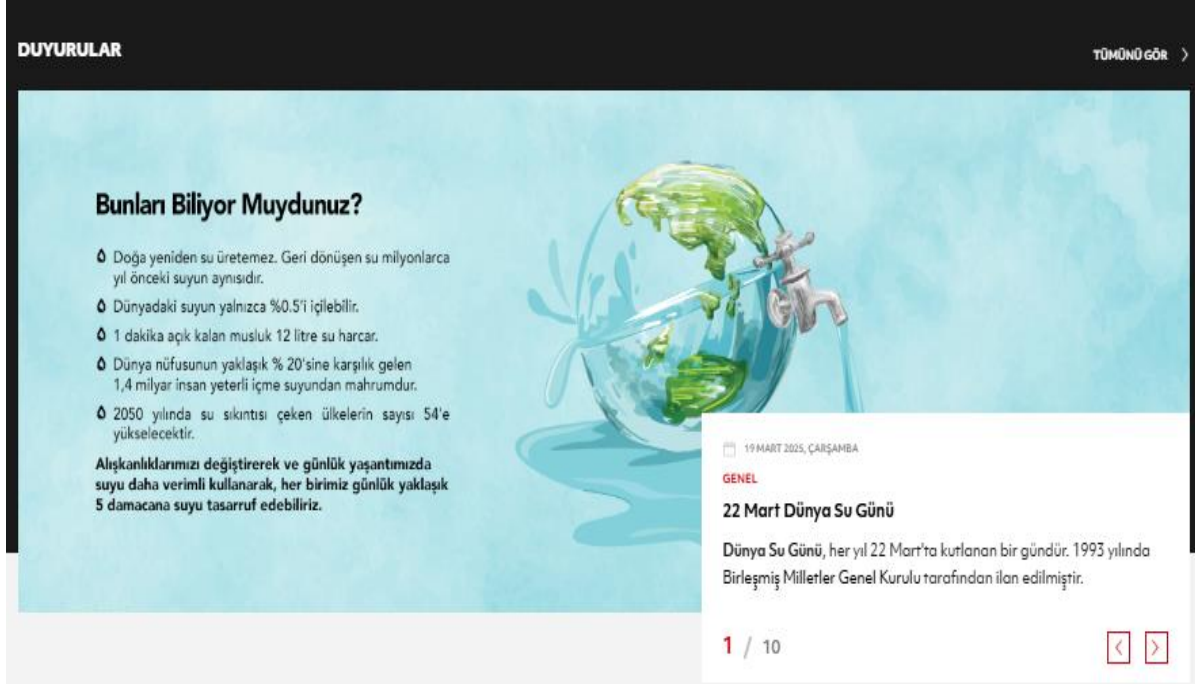


Figure 7-3 World Water Day Announcement Image

Note in the Image: By changing our habits and using water more efficiently in our daily lives, each of us can save approximately 5 bottles of water per day.

- **World Street Animals Day Events**

The company conducted an awareness campaign at its factory to draw attention to the living conditions of stray animals worldwide. Furthermore, ASAŞ's planned corporate social responsibility projects include the "Habitat for Stray Animals" project.

Planned Corporate Social Responsibility Projects;

- **Habitat for Stray Animals**

In Akyazı district, and especially in the factory area, there is a desire to create habitats for stray animals, which has become a major problem for the local population in recent years. The aim here is to provide comfort for the local people and create a natural habitat for stray animals. As part of these efforts, the location has been identified within the factory grounds. During the Stakeholder Participation Meeting, a verbal agreement was reached with Akyazı Municipality to undertake a joint project on this issue.

Initially planned with a capacity of 50 kennels and 100 dogs, this living space will differ from typical animal shelters in that it will not be surrounded by fences, creating a natural habitat for stray animals. Organic food waste will be used to feed the animals, and their populations will be kept under control through sterilization programs. Information about the project will be updated as it comes to fruition.

- **Energy and Environment Seminars**

ASAŞ creates value in its region and provides employment to thousands of people. It prioritizes the development of its region and supports the solution of local problems. Due to its field of activity, it has significant experience in the efficient use of energy. It intends to share this experience, based on the principle that "a tree is best shaped while it is young," by giving seminars on energy and the environment in schools.

8 GRIEVANCE MECHANISM

A complaints mechanism has been established under the IFC Performance Standards (PS1).

The Complaints Mechanism (CM) is a mechanism that provides channels for stakeholders to provide feedback and voice their complaints about project activities, and enables the identification and resolution of issues affecting the project. By increasing transparency and accountability, the CM aims to reduce the risk of the project impacting citizens/beneficiaries and acts as a crucial feedback and learning mechanism to improve the project's impact.

The Project Management System (PM) will be accessible to a wide range of project stakeholders who are likely to be directly or indirectly affected by the project.

Complaints are initially received by the Complaints Mechanism Officer, Zeynep TÜRKYILMAZ TÜRK. This will be carried out by the Complaints Mechanism Officer. The Officer will be responsible for classifying complaints according to specific categories and forwarding them to the relevant party according to the subject of the complaint. Detailed information regarding Complaint Registration is given in Section 10.2.

The time it takes to respond to or evaluate a complaint will primarily depend on the complexity of the complaint. Ideally, however, a resolution should be reached within 14 calendar days of receiving the complaint.

The methods used to announce the Complaints Mechanism should be culturally appropriate and consistent with general stakeholder information practices. For example, vulnerable groups and other stakeholders may access information differently, and equal access to information should be ensured for both groups. Stakeholders will be able to share their views and complaints throughout the life of the Facilities through a range of options including mail, email, complaint boxes, and face-to-face meetings.

All stakeholders who submit a complaint may request that their application be evaluated confidentially. The opening of the complaint boxes will be recorded (see Appendix 6). Those responsible will ensure that the complainant's name and contact information are not disclosed without their consent.

8.1 National Grievance Mechanism

Throughout the project lifecycle, stakeholders will also be able to utilize the national Complaints Mechanism channels detailed below.

The channels for submitting complaints and suggestions to the Administration, primarily the national Grievance Mechanism such as the Turkish Presidency Communication Center (CIMER) and the Foreigners Communication Center (YIMER), are listed below:

Turkish Presidency Communication Center (CIMER) Communication Channel: CIMER provides a centralized complaint system for Turkish citizens, legal entities, and foreigners. CIMER will be offered to Project stakeholders as an alternative and well-known channel to directly convey their complaints and feedback regarding the Project to government authorities.

Table 8-1 CIMER Communication Channels

Website	:	www.cimer.gov.tr
Call Center	:	150
Phone Number	:	+90 312 525 55 55
Fax Number	:	+90 312 473 64 94

Foreigners Communication Center (YIMER) Communication Channel: YIMER will be offered to foreign stakeholders of the project as an alternative and well-known channel for them to convey their complaints and feedback regarding the project directly to government authorities.

Table 8-2 YIMER Communication Channels

Website	:	www.yimer.gov.tr
Call Center	:	157
Phone Number	:	+90 312 5157 11 22
Fax Number	:	+90 312 920 06 09

8.2 Project - Level Grievance Mechanism

The channels for submitting complaints and suggestions to ASAŞ are listed below.

Table 8-3 Grievance Mechanism Communication Channels

Phone : 0 216 680 07 80
Email : info@asastr.com
Feedback form : https://www.talepkutusu.com/ , For posters and QR codes placed in buildings, please go to Appendix 4.
Suggestion and Complaint Boxes: Suggestion and complaint boxes placed in buildings (See Appendix 5).
Complaints Mechanism Officer: Zeynep TÜRKYILMAZ TÜRK (Senior Employee Relations Specialist)

8.3 Grievance Mechanism for Employees

A list of current contact points is provided in employee handbooks and/or on notice boards. All processes related to the grievance mechanism are communicated in language understandable to employees. The grievance mechanism is one of the topics covered in orientation training. When a dispute arises regarding employee rights, a complaint is made through the grievance mechanism or through the "Employee Representative," who is a full-time permanent employee of the workplace and elected by the employees. Employees can report any unaddressed safety measures, hazards, or risks to the employee representative, occupational safety specialist, and/or workplace physician (appointed by the employer). The employee representative then submits the details of these hazards and risks to the Occupational Health and Safety Board for evaluation.

The Employee Representative is responsible for forwarding all requests and demands reported by other employees to the Human Resources department (See ASAŞ - Employee Representative Duties, Authority and Election Instructions Form No: IC-TA-131).

Complaint Procedure;

To prioritize resolution, complaints should be investigated as quickly as possible. Regardless of general response and resolution times, some complaints of significant importance, such as urgent security issues or matters relating to the livelihoods of local residents, may require immediate intervention. The ASAŞ Complaints Management Instruction document (IK-TA-118), which forms the basis of the complaint procedure, has been referenced. IK-TA-118_5 Complaints Management Instruction is accessible to internal stakeholders via QDMS.

There are 10 steps to completing the Grievance Mechanism. This process is explained with the steps listed below:

Step 1: Identifying the complaint will be done using personal communication channels, following appropriate training and information provided by the Complaints Mechanism Officer.

This complaint can be submitted in person, by telephone, by mail, through complaint boxes, complaint QR codes, or by email, using the Grievance Mechanism communication channels. The Grievance Mechanism communication channels are listed in Section 8.2.

Step 2: The complaint is recorded in the Complaint Log, both in writing and electronically, within one day of receipt. The complaint record will be managed by the assigned Grievance Mechanism Officer. The severity of the complaint will then be assessed within five to seven days. The severity criteria are summarized in the list below.

Level 1 Complaint: an individual or "one-off" complaint (within a specific reporting period - one year) and inherently local in nature.

Note: Some one-off complaints may be significant enough to be considered a Level 3 complaint, for example when a national or international law is violated (see Level 3).

Level 2 Complaint: Common and recurring complaints (e.g., noise, dust from facilities, etc.).

Level 3 Complaint: A one-off complaint or widespread and/or repeated complaints; also, complaints resulting in a serious breach of the Facility's Policies or national legislation, complaints leading to negative national/international media attention, complaints deemed to have caused negative comments from the media or other key stakeholders (e.g., inadequate waste management).

In cases where a complaint is deemed to fall outside the scope of the Complaints Mechanism, the complaint should be communicated to the other party via the preferred communication method, and an alternative solution should be proposed.

Step 3: Complaint acceptance is done in person or by phone, through complaint boxes, and by mail. The complaint process is expected to be completed within 14 business days of submission (excluding Level 3 complaints requiring immediate attention). If the complaint is unclear or requires additional information, the complainant will be asked for clarification at this step.

Step 4: The level of the complaint is determined by the Complaints Mechanism Officer. All Level 3 complaints are reported to the Facility Manager. ASAŞ's senior management supports the Complaints Mechanism Officer in deciding who should handle the complaint and discusses whether additional support is needed in the complaint closure process.

Step 5: The Grievance Mechanism Officer forwards the complaint to the relevant departments. To ensure an effective response to the complaint, they will forward it via email to the relevant department/personnel within five to seven days (e.g., human resources, administrative affairs, etc.).

Step 6: The complaint will be responded to by the authorized team within 14 days. During this process, input from senior management of the relevant departments may also be used as needed. The response to the complaint should include an appropriate solution; taking measures to address the existing problem or specifying monetary compensation to compensate for damages incurred during Facility Operations.

Step 7: Responses to complaints are provided by the relevant departments. Level 3 complaints are approved for closure within 14 days by the senior manager of the relevant department, while Level 2 and Level 1 complaints are approved by the Complaints Mechanism Officer. This approval can be given with a signature or via email specifying the necessary agreement. The Complaints Mechanism Officer completes the necessary filings and records the data in the Complaint Log.

Step 8: Communication regarding the response to the complaint must be carefully coordinated. The Complaints Mechanism Officer ensures that an appropriate approach to delivering the response is adopted and implemented.

Step 9: The complainant's response is recorded to help assess whether the complaint was closed correctly or if further action is required. The Complaints Mechanism Officer uses appropriate communication channels, via telephone or in person, to confirm whether the complainant understood the response and is satisfied.

If the complaint is made anonymously, a summary of the complaint and its resolution should be posted on notice boards around the facility and in the villages affected by the facility. The External Stakeholder Relations Officer should also contact the village headman regarding anonymous complaints and their resolution.

If possible, the complainant's response, along with notes on methods of redress to prevent future complaints, should be recorded in the Complaint Log.

If the Complaints Mechanism Officer or other department managers find a complaint received through the complaints mechanism to be outside their area of responsibility, the Complaints Mechanism Officer will provide a detailed explanation/justification for this situation. If the complainant is not satisfied with the response, further explanation will be provided on how the complainant can continue the complaint process.

Step 10: The complaint is closed with a signature from the Complaints Mechanism Officer. The Complaints Mechanism Officer decides whether a complaint can be closed or

requires further investigation. If further investigation is needed, the Complaints Mechanism Officer must return to Step 2 to re-evaluate the complaint. After evaluating whether the complaint can be closed, the Complaints Mechanism Officer approves the closure of the complaint. To reach an agreement for the closure of Level 3 complaints, signatures will be requested from the relevant departments. This agreement may be in the form of a signature or an email explaining the agreement. The Complaints Mechanism Officer makes the necessary filings and records the data in the Complaint Log.

The Customer Complaints Evaluation Procedure; ASAŞ uses the Customer Complaints Evaluation Procedure Document (PR.KY.10) to regulate the receipt, follow-up, notification of receipt, initial evaluation, investigation of the product in question, and closure of complaints arising from activities with dealers and customers. The customer complaints evaluation procedure has 6 steps. This process is explained with the steps listed below:

Step 1: Receiving Complaints / Communication: Customers (Dealers) can contact the Sales Directorate, Quality Management Department, and Technical Departments for complaints and requests. Customer complaints can be sent to team members within the Sales Directorate, Quality Management Department, and Technical Departments via telephone, fax, email, or webmail, along with label or inkjet information.

Step 2: Notification of Complaint Receipt: The customer complaints unit will inform you verbally or in writing within 24 hours at the latest, stating, "Your complaint has been received or is being evaluated by the factory."

Step 3: Follow-up, Initial Assessment, Investigation, and Response to Complaints: Customer complaints are recorded in the QDMS and FR.KY.35 Customer Complaints Tracking List Form (*for response time*). If there is missing information to describe the complaint, or if a sample is required for examination, the customer is contacted to complete the missing information, and an External Customer Complaint is created for the relevant unit via QDMS. The relevant production unit is notified, and an Emergency Customer Complaint Meeting is held within the scope of YAK (Health, Safety, and Environment).

Step 4: Refund Process and Customer Satisfaction After Complaint Acceptance: If the complainant (dealer) is found to be justified in their complaint, the grievance will be resolved according to an agreement reached mutually with the complainant.

Step 5: Reporting and Improving Customer-Related Processes: The Quality Systems and Customer Relations Specialist prepares monthly reports to evaluate complaints periodically, including their distribution by month, causes, types of errors, resolution status, and to identify areas for improvement.

9 MONITORING AND REPORTING

Project monitoring methods will be applied throughout the project lifecycle. The Stakeholder Engagement Plan will be reviewed annually and updated as needed based on project developments and unexpected public reactions. The complaints mechanism established for the project will be used effectively, and a statistical summary of the complaints mechanism's outputs will be shared with the Stakeholder Engagement Manager.

The key performance indicators to be used during the implementation of the Stakeholder Engagement Plan Table 9-1

Table 9-1 Key Performance Indicators (KPIs) and Monitoring Activities – Stakeholder Engagement

No	KPI	Aim	Monitoring Method
1	Number of Stakeholder Complaints	Annual increase and/or decrease data	Database
2	Number of Complaints on Similar Issues	Annual decrease	Database
3	Number of complaints answered within a targeted one-month timeframe.	Target 90%	Database
4	Response Time to Complaints	For non-Level 3 complaints, 14 calendar days. For Level 3 complaints, the quickest possible time.	Database
5	Providing feedback to stakeholders on the implementation of the Complaints Mechanism.	Providing stakeholders with regular reports on the outcomes of the Complaints Procedure.	On-site inspection Reporting
6	Complaints Internal Audit Procedure to ensure the Complaints Mechanism is implemented and that complaints are handled according to the criteria.	Annual audit target is to resolve 90% of complaints within one month and to the satisfaction of the complainant.	Audit Report

10 TRAINING PROGRAMS

ASAŞ Stakeholder Engagement Plan managers hold monthly online or in-person stakeholder engagement meetings. The meeting agenda and presentation to be used are shared with the Stakeholder Engagement Plan managers one week prior to the meeting, and the meeting minutes are recorded to create target outcomes.

Table 4 below lists training and seminar programs, primarily targeting internal stakeholders, and these programs are proposed by ÇEVTAŞ.

Table 10-1 Existing and Proposed Training - Seminars

Responsible Party	Relevant Departments	Current Training - Seminars	Suggested Training - Seminars
ASAŞ Aluminum Industry and Trade Inc.	Board of Directors General Manager Deputy General Manager	Management of Environmental and Social Risks Quality System Sustainable Development Stakeholder Engagement Plan	IFC Performance Standard-1: Assessment and Management of Environmental and Social Risks and Impacts. World Bank Environmental and Social Framework United Nations Sustainable Development Goals Employee Rights Human Resources Policy and Procedure World Bank Environmental and Social Framework Preventing Discrimination and Harassment in the Workplace Prevention of Gender-Based Violence and Harassment Prevention of Forced Labour, Child Labour and Modern Slavery
	Stakeholder Engagement Plan Manager Stakeholder Engagement Plan Responsible Persons	Management of Environmental and Social Risks Quality System Sustainable Development Stakeholder Engagement Plan ASAŞ holds monthly stakeholder engagement meetings, either online or in person. The meeting agenda and presentation to be used are shared with the Stakeholder Engagement Plan Coordinators one week prior to the meeting, and the meeting minutes are recorded to create target outcomes.	
	Complaints Mechanism Officer - Internal Complaints Officer - External Complaints Officer - Ethics Team Manager	Stakeholder Engagement Plan Project-Level Grievance Mechanism Internal and External Complaints Communication Channels Personnel Management System Management Module (Quality) Document Management System (QDMS) Instant Quality System in its Place Employee Safety Management Procedure	



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



Name Surname	:	
Please tick how you would like to be contacted (phone, email).	:	<input type="checkbox"/> E-Mail: <input type="checkbox"/> Personal: <input type="checkbox"/> Telephone : <input type="checkbox"/> Other :

THIS SECTION WILL BE FILLED OUT BY THE COMPLAINT OFFICER

Method of Submitting the Complaint	:	<input type="checkbox"/> Complaint Box (specify box number)..... <input type="checkbox"/> Other (please explain).....
Complaint Level	:	
Complaint Registration Date & System Number	:	S.No/...../..... :

Form No: IK-FR-219-2019.06-2022.01-04



ASAS ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



ANNEX - 2 Complaint Closure Form (Printed)

Complaint Owner	<input type="checkbox"/> External Stakeholder <input type="checkbox"/> Employee	
Is It an Emergency?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Complaint Closure Number		
Complaint Application Date:		
Target Complaint Closure Date:		
Stakeholder Contact Information, If Provided		
Preferred Communication Tool		
Description of the Complaint		
Is Compensation Required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Complaint Level and Evaluation of the Complaint		
CONTROL OF COMPENSATORY WORKS AND DECISION PROCESS		
Stages of Compensatory Work		Completion Date and Responsible Party
1.		
2.		
3.		
4.		
5.		
6.		
Signature:		
History:		
If the complaint is not anonymous Is the complainant satisfied with the remedial action taken for his complaint?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Comment:

	ASAS ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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Should the complaint be reviewed again?	[] Yes [] No	Comment:
New Complaint Number		Re-Application Date :
Complaint Closure: To be completed by the Non-Anonymous Complainant		
Complainant's Name and Surname		
Are you satisfied with the remedial measures taken for your complaint?	[] Yes [] No	Comment:
Complainant's Signature	History:	
The Complaint Will Be Completed by the Relevant Project Officer		
Are you satisfied that the complaint has been resolved?	[] Yes [] No	Comment:
Signature of the Public Relations Specialist	History:	

ANNEX - 3 Feedback Form (Internet)

Category *

Select Category

ASAŞ Identification No.

Name

Surname

Subject *

Description

Phone

Email

Would you like to be contacted regarding your request?

Yes (I want) No (I don't want)

Have you previously submitted a request on the same issue?

Yes (I filed a complaint) No (I didn't complain)

Do you know if anyone else has the same problem?

Yes (I know) No (I don't know)

If you have a proposed solution regarding your request, please share it with us

Attachment

Choose File

The maximum file size can be 30 MB

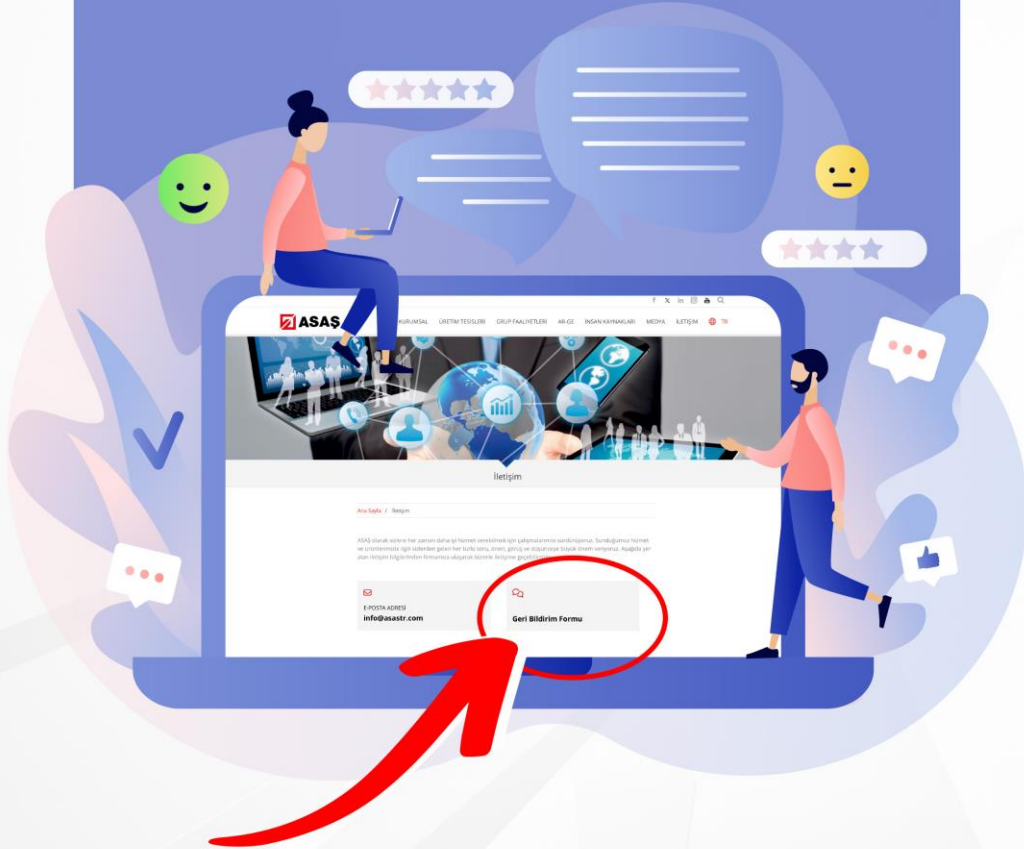
ANNEX - 4 Feedback Platform Poster

Geri Bildirim Platformu Yayında!

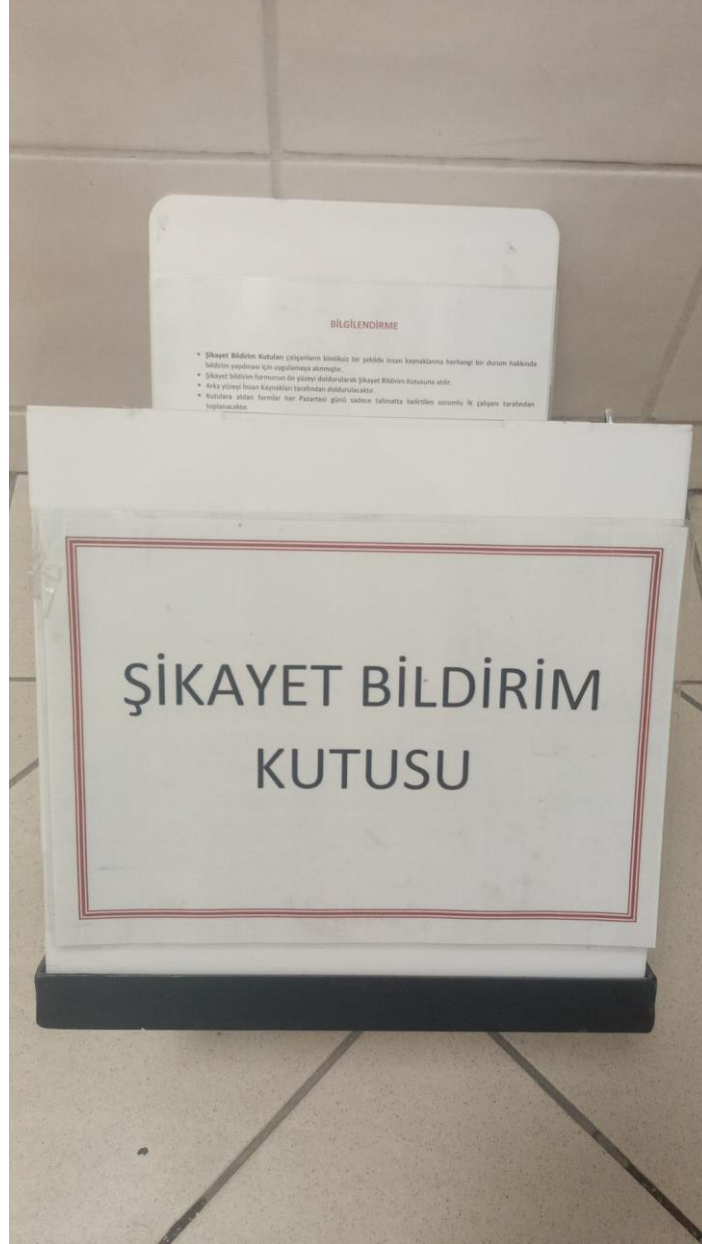
ASAŞ ile ilgili **talep**, **öneri** ve **şikayet** gibi tüm geri bildirimlerinizi artık bu platform üzerinden anonim olarak bizimle paylaşabilirsiniz.

Geri bildirim platformuna, tüm resmi web sitelerimizin "**İletişim**" sayfası üzerinden ve aşağıdaki **QR kod** ile erişebilirsiniz.

Tüm geri bildirimler kişiler tarafından özellikle kimlik belirtilmek istenmediği sürece anonim olarak toplanmakta ve değerlendirilmektedir.





ANNEX - 5 Photo of Current Suggestion Complaint Box




NOTE ON THE BOX: COMPLAINT REPORT BOX



NOTE ON THE BOX: COMPLAINT REPORT BOX

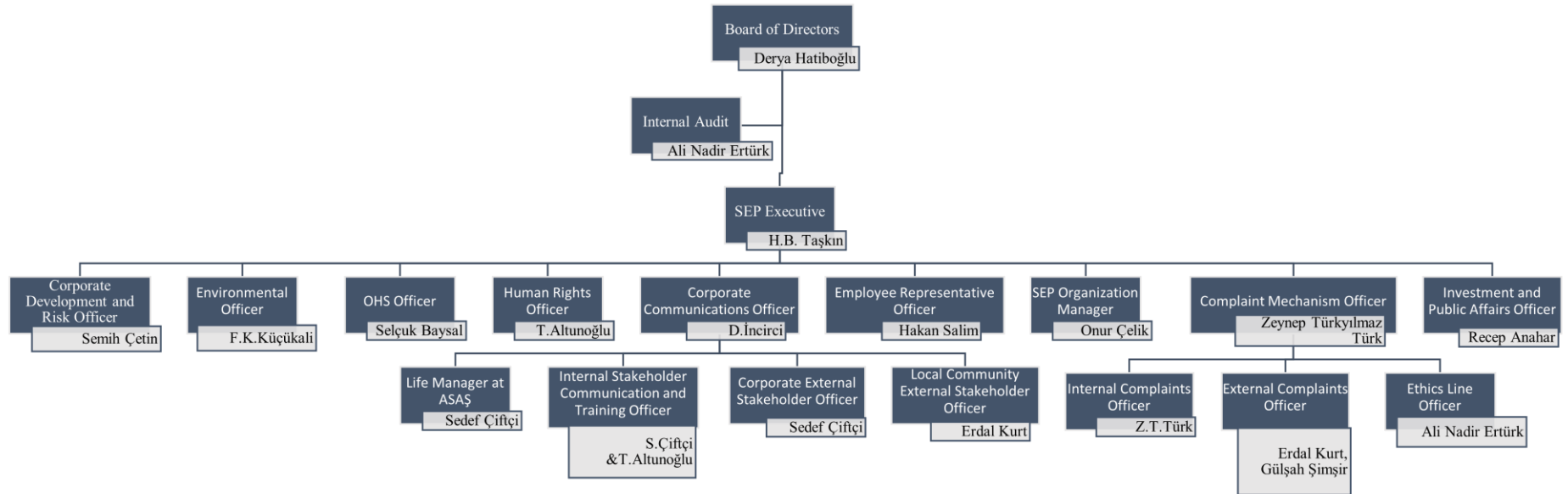
	ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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ANNEX - 6 Complaint Box Opening Control Form (ASAŞ- Form No: IK-FR-252-2022.02)

		COMPLAINT BOX OPENING CHECK FORM			
COMPLAINT NOTIFICATION BOX OPENING DATE:					
FACTORY	BOX NUMBER	FORM NUMBER	NOTES	OFFICER OPENING THE BOX NAME SURNAME - SIGNATURE - DATE	EMPLOYEE REPRESENTATIVE NAME SURNAME - SIGNATURE - DATE
PROFILE FACTORY	1				
	2				
	3				
	4				
YASSI FACTORY.	5				
	6				
PVC FACTORY.	7				
	8				
..... forms from the complaint boxes have been delivered to the person below.					
DELIVERED BY NAME, SURNAME, SIGNATURE, DATE			DELIVERY RECEIVER NAME, SURNAME, SIGNATURE, DATE		

Form No: IK-FR-252-2022.02

ANNEX - 7 SEP Organization Chart



	ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN	
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ANNEX - 8 Stakeholder Consultation Meeting Content and Records

Meeting Dates	: 16.09.2025	: 17.09.2025	: 18.09.2025
Meeting Start and End Times	14:00 17:00	: 10:00 12:00	: 10:00 12:00
Location of the Meeting	Sakarya Provincial Directorate of Environment, Urbanization and Climate Change and Sakarya Metropolitan Municipality Directorate of Environmental Protection and Control (The meeting was held in two separate sessions.)	Akyazı Municipality	Yazılıgürgen and Kızılbayır Neighborhood Village Square

Activity

Opening Speech of the Meeting

In accordance with the Personal Data Protection Law, general information regarding meeting recording and the processing of personal data was provided. There was one participant who objected to the meeting being recorded, therefore the meetings were not recorded.

Information was provided about the ASAŞ Aluminum Production Facility project and its objectives.



ASAŞ ALÜMİNYUM ÜRETİM TESİSİ

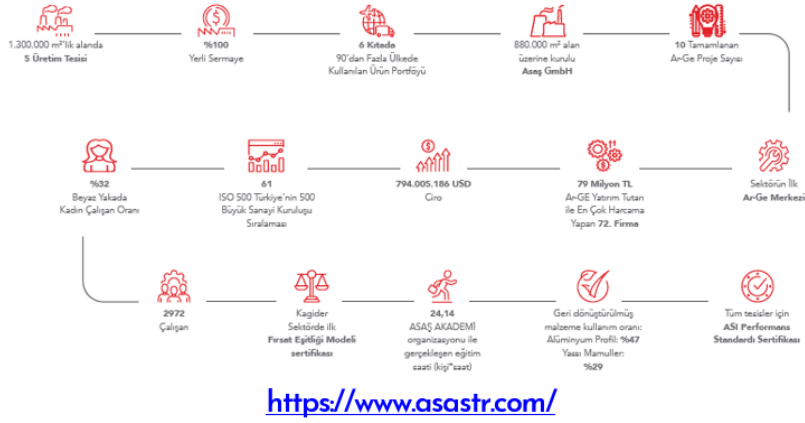
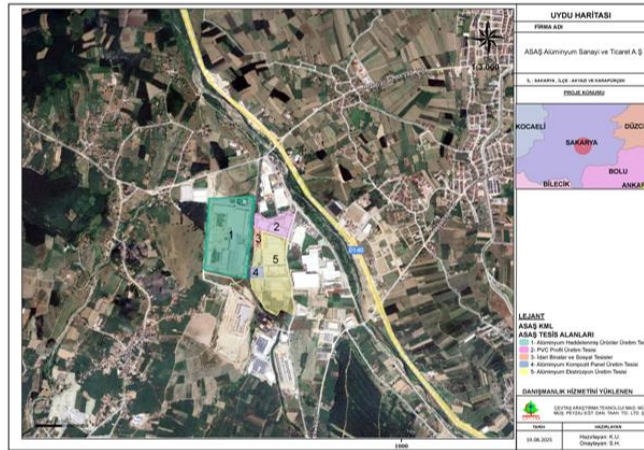


Photo 8: Presentation File Shared Sections 01

Presentation notes: ASAŞ was founded in Gebze in 1990. ASAŞ is one of Türkiye's most important industrial companies and exports to more than 90 countries. ASAŞ combines its expertise in production with advanced design and product development techniques to offer high-quality products under its own brand. ASAŞ has a wide range of products for the construction market under its brands; ASAŞPEN (PVC door and window systems), NATURALBOND (aluminum composite panels), ALUDES (aluminum flagpoles and lighting poles), RESCARA (aluminum door, window and facade cladding systems), NATUROLL (shutter systems, garage doors and motor control systems).

Information was provided about the facility areas and production capacities.

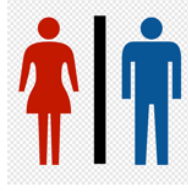


- Alüminyum Profil ve Kompozit Panel Üretim Tesisi, PVC Profil ve Panjur Üretim Tesisi:
Kışla Alanı Street No: 2-2/1, 54400 Akyazı - Sakarya / Turkey
 - ASAŞ Alüminyum Yassı Mamul Üretim Tesisi:
Fabrikalar Street No. 50, 54400 Karapürçek - Sakarya / Turkey
- Tesis Alanlarının mülkiyeti, ASAŞ Sanayi ve Ticaret A.Ş. adına kayıtlıdır. Arazi edinimi Mart 2018'de başlamış ve Ağustos 2020'de tamamlanmıştır.

<https://www.asastr.com/>

Photo 9: Presentation File Shared Sections 02

Information about current employees within ASAŞ has been provided.



	Kadın	Erkek	Genel Toplam
Beyaz Yaka	196	428	624
Mavi Yaka	74	2233	2307
Genel Toplam	270	2661	2931

Photo 10: Presentation File Shared Sections 03

Information was provided on Turkish legislation and international standards.

Türk Mevzuatı

Çevresel Etki Değerlendirme (ÇED) Yönetmeliği

Türkiye Ulusal ÇED Yönetmeliği'ne Paydaş Katılım Planı hazırlanması zorunluluğu 29.07.2022 tarih ve 31907 sayılı Resmî Gazete'de yayımlanan ÇED Yönetmeliği ile getirilmiş olup, Projenin ÇED süreci 2022 yılı öncesinde tamamlanmıştır.

Halkın bilgilendirilmesi ve süreçte katılım toplantısı

MADDE 9- (1) Halkı yatırım hakkında bilgilendirmek, projeye ilişkin görüş ve önerilerini almak üzere; Bakanlıkça yeterli verilmiş kurum/kuruluşlar ve proje sahibinin katılımı ile Bakanlıkça belirlenen tarihte, projeden en çok etkilenmesi beklenen ilgili halkın kolaylıkla ulaşabileceği il müdürlüğü tarafından belirlenen merkezi bir yer ve saatte halkın bilgilendirilmesi ve süreçte katılım toplantısı düzenlenir.

(2) Bakanlıkça yeterli verilmiş kurum/kuruluşlar toplantı tarihini, saatini, yerini ve konusunu belirten bir ilan; projenin gerçekleştirileceği yörede yayımlanan yerel süreli yayın ile birlikte yaygın süreli yayın olarak tanınlanan bir gazetede toplantı tarihinden en az 10 takvim günü önce yayımlanır.

(3) Halkın bilgilendirilmesi ve süreçte katılım toplantısı, il müdürünün veya görevlendireceği bir yetkilinin başkanlığında yapılır. Toplantıda halkın; proje hakkında bilgilendirilmesi, görüş, öneri ve sorularının alınması sağlanır. Halk tarafından dile getirilen görüş, öneri ve itirazlar toplantı hakkında düzenlenecek tutanakta belirtilir. Toplantı başkanı, katılımcılardan görüşlerini yazılı olarak vermelerini isteyebilir. Toplantı tutanağı, bir sureti il müdürlüğünde kalmak üzere Bakanlığa gönderilir.

(4) Komisyon üyeleri, özel format belirleme öncesinde, projenin planlandığı alanı inceleyebilir, bildirilen tarihte düzenlenecek halkın bilgilendirilmesi ve süreçte katılım toplantısına katılabilirler.

(5) Halk, proje ve etaberi hakkında bilgilendirmek, halkın projeye ilişkin görüş ve önerilerini almak üzere, Bakanlıkça yeterli verilmiş kurum/kuruluşlar tarafından paydaş katılım planı (PCTP) hazırlanır. Hazırlanan paydaş katılım planı ÇED başvuru dosyası ekinde sunulur. Bakanlık gerekli görüldüğünde, yeterli verilmiş kurum/kuruluşlardan halkın bilgilendirilmesine yönelik olarak ÇED süreci boyunca; bilgilendirici broşür dağıtılması, anket, seminer gibi çalışmalar yapılması veya proje ile ilgili internet sitesi hazırlanarak bilgi paylaşılması gibi ilave çalışmalar yapmasını da isteyebilir. Ayrıca Bakanlık tarafından talep edilmesi halinde ÇED süreci içerisinde bu plan güncellenir.

Uluslararası Standartlar

Uluslararası Finans Kuruluşu (IFC) Performans Standartları ve Uluslararası Gereklilikleri

IFC, Sosyal ve Çevresel Sürdürülebilirlik Performans Standartları oluşturulmuş ve 2012'de güncellenmiştir.

Performans Standardı 1: Çevresel ve Sosyal Risk ve Etkilerin Değerlendirilmesi ve Yönetimi

Performans Standardı 2: İş ve Çalışma Koşulları

Performans Standardı 3: Kaynak Verimliliği ve Kirliliğin Önlenmesi

Performans Standardı 4: Toplum Sağlığı, Güvenliği ve Emniyeti

Performans Standardı 5: Arazi Alımları ve Zorunlu Yeniden Yerleştirme

Performans Standardı 6: Biyolojik Çeşitliliğin Korunması ve Canlı Doğal Kaynakların Sürdürülebilir Yönetimi

Performans Standardı 7: Yerli Halklar

Performans Standardı 8: Kültürel Miras

Photo 11: Presentation File Shared Sections 04

The objectives of stakeholder engagement/consultation were emphasized, and the criteria for selecting stakeholders were explained. Information about the project's stakeholders was provided.

Paydaş Grupları	Paydaş Türü	
	Etkilenen	İlgilenen
Yerel Halk		
• Yerel anaokulları, ilkokullar, ortaokullar ve liseler	✓	
• Yazlıgürgen ve Küçücek İstiklal Muhtarları ve Mahalle Sakinleri		
• Sakarya Küçücek Organize Sanayi Bölgesi'ndeki komşu tesisleri		
ASAS Çalışanları		
• Ortaklar (Hissedar)	✓	
• Üst Yönetim		
• Tesis Çalışanları		
Kamu Yönetim Birimleri		
• Enerji ve Tabii Kaynaklar Bakanlığı		
• Çalışma ve Sosyal Güvenlik Bakanlığı		
• Ulaştırma ve Altyapı Bakanlığı		
• Çevre, Şehircilik ve İklim Değişikliği Bakanlığı		
• Hazine ve Maliye Bakanlığı		
• Akyazı ve Karapürçek Kaymakamlığı		
• Sakarya Valiliği		✓
• Sakarya Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğü		
• Sakarya İl Sağlık Müdürlüğü		
• Sakarya Ticaret ve Sanayi Odası		
• Akyazı ve Karapürçek İlçe Sağlık Müdürlüğü		
• Sanayi ve Teknoloji Bakanlığı		
• Türkiye İş Kurumu (İŞKUR)		
• Organize Sanayi Bölgeleri Üst Teşkilatı (OSBÜK)		
Eğitim Birimleri		
• Sakarya Üniversitesi	✓	
• Sakarya Uygulamalı Bilimler Üniversitesi		
• Akyazı ve Karapürçek İlçelerindeki Meslek Liseleri		
Sağlık Birimleri		
• Sakarya Üniversitesi Eğitim ve Araştırma Hastanesi	✓	
Belediyeler		
• Akyazı Belediyesi		
• Karapürçek Belediyesi	✓	
• Sakarya Büyükşehir Belediyesi		
Muhtarlıklar		
• Yazlıgürgen ve Küçücek İstiklal Muhtarlıkları	✓	
Tedarik Zincirindeki Hammadde ve Hizmet Sağlayıcıları, Piyasadaki Alıcılar İle Benzer Sektörde Üretim ve/veya Satış Yapan Diğer Proje / Tesis / Firmalar / Müşteriler	✓	
Sivil Toplum Kuruluşları (STK)		✓
Dernekler ve Üyelikler*		
• Aluminium Stewardship Initiative		
• Sürdürülebilir Kalkınma Derneği Türkiye		
• Cepheder (Cephe Sanayici Ve İş İnsanları Derneği)		✓
• ECOVADİS		
• Saha İstanbul (Savunma, Havaçılık Ve Uzay Kümelenmesi Derneği)		
• UN GLOBAL		
Standart Oluşturan Kurumlar (ISO, TSE, DIN, RAL vb.)		✓
Bankalar		✓
Sigortalar		✓
Sanayi ve Ticaret Odaları		✓
Gümrük Müşavirlikleri		✓
Dezavantajlı, Hassas ve Savunmasız Gruplar	✓	
Medya		✓

Photo 12: Presentation File Shared Sections 05

A range of tools and methods have been and will continue to be used for stakeholder engagement within the scope of the project. To ensure efficient and effective stakeholder engagement throughout the project's lifecycle, new mechanisms deemed appropriate will be incorporated into the process, in addition to the communication mechanisms already established. Information on stakeholder engagement tools and the Complaints Mechanism has been provided.

Paydaş Katılım Araçları

Paydaşlarla iletişim kurmak için kullanılan yöntemler aşağıda sunulmuştur:



Resmi ve gayri resmi yüz yüze görüşmeler (bireysel ve kollektif) - büyük olasılıkla Proje ömrü boyunca devam edecek birincil istişare şekli olacaktır. Buna, Proje tarafından planlanan ya da paydaşlar tarafından talep edilen paydaş toplantıları da dahildir.

[ASAŞ web sitesi](#) – kamuya açık proje duyuruları, belgeler, raporlar vb.

Şikayet mekanizması - özellikle doğrudan etkilenen paydaşları hedef alır. Söz konusu mekanizmanın ayrıntıları, etki alanındaki paydaşlara sunuldu ve sunulmaya devam edecektir.

Medya tanıtımları – gazete, dergi, sektörel yayınlar ile bilgi paylaşımları vb.

Sosyal medya kanalları – [LinkedIn](#), instagram, X, [YouTube](#).

Toplantı ve görüşmeler – belirli periyotlarda ya da yerinde aniden düzenlenen toplantılar.

Şikayet Mekanizması

IFC Performans Standartları (PS1) kapsamında bir şikayet mekanizması oluşturulmuştur.



Telefon : 0 216 680 07 80

E-mail : info@asastr.com

Gerçek bildirim formu : <https://www.talepkutusu.com/>,

Öneri Şikayet Kutuları: Binalara yerleştirilen öneri şikâyet kutuları

Şikayet Mekanizması Yetkilisi: Zeynep TÜRKÜYLMAZ TÜRK

(Çalışan İlişkileri Kıdemli Uzmanı)

Photo 13: Presentation File Shared Sections 06

Explanations were provided regarding stakeholder participation, the receipt and evaluation of suggestions and complaints, and keeping relevant parties informed about this process (decisions made regarding suggestions and complaints, additional measures implemented, etc.).

- It was announced that suggestions and complaints can be received via digital form, telephone, email addresses, and QR code.

Şikayet Mekanizması

T.C. Cumhurbaşkanlığı İletişim Merkezi (CİMER) İletişim Kanalı:



CİMER, Proje paydaşlarına, Proje ile ilgili şikayetlerini ve geri bildirimlerini doğrudan devlet yetkililerine iletmek için alternatif ve iyi bilinen bir kanal olarak sunulacaktır.

İnternet Sitesi	:	www.cimer.gov.tr
Çağrı Merkezi	:	150
Telefon Numarası	:	+90 312 525 55 55

Yabancılar İletişim Merkezi (YİMER) İletişim Kanalı: YİMER, projenin yabancı uyruklu paydaşlarına, Proje ile ilgili şikayetlerini ve geri bildirimlerini doğrudan devlet yetkililerine iletmek için alternatif ve iyi bilinen bir kanal olarak sunulacaktır.

İnternet Sitesi	:	www.yimer.gov.tr
Çağrı Merkezi	:	157
Telefon Numarası	:	+90 312 5157 11 22

Photo 14: Presentation File Shared Sections 07

The participants' questions were answered. A closing speech was given, and the consultation meeting was concluded.

Teşekkür ederiz!



Proje Sahibi	Danışman
 ASAŞ Alüminyum Sanayi ve Ticaret A.Ş. Rüzgârlı Bahçe Mah., Kumlu Sok. No.2 ASAŞ İş Merkezi, 34810 Kavacak, Beykoz – İstanbul, Türkiye ☎: +90 (216) 680 07 80 ☎: +90 (216) 680 07 81	 ÇEVTAŞ Araştırma Telenoloji Madencilik Mühendislik Müşavirlik Peyzaj Eğitim Danışmanlık Taahhüt Tic. Ltd. Şti. Kırım Caddesi (10. Cad.) No:36/5 Emek – Ankara, Türkiye ☎: +90 (216) 680 07 80 ☎: +90 (216) 680 07 81

Photo 15: Presentation File Shared Sections 08



ASAŞ ALUMINUM PRODUCTION FACILITY
STAKEHOLDER ENGAGEMENT PLAN



ANNEX – 9 Internal Stakeholder Information Video