



**ASAŞ ALÜMİNYUM
SANAYİ VE TİCARET A.Ş.**

**STAKEHOLDER ENGAGEMENT PLAN
(SEP)**

January, 2021

Ankara

ASAŞ ALÜMİNYUM SANAYİ VE TİCARET A.Ş.

STAKEHOLDER ENGAGEMENT PLAN

Version	Revision	Date	Prepared By	Quality Management By	Checked By	Approved By
Draft	A.0	December 2020	Açelya Duman Sociologist	Esra Okumuşoğlu Geological Engineer	Günel Özenirler Environmental Engineer	Turgay Eser Environmental Engineer

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CLIENT:



ASAŞ Alüminyum Sanayi ve Ticaret A.Ş. Rüzgârlı
Bahçe Mah., Kumlu Sok. No.2 ASAŞ İş Merkezi,
34810 Kavacık, Beykoz – İstanbul, Türkiye
☎: +90 (216) 680 07 80
☎: +90 (216) 680 07 81

CONSULTANT:



Tepe Prime İş Ve Yaşam Merkezi
Mustafa Kemal Mahallesi Dumlupınar
Bulvarı No: 266 B Blok Kat: 2 Daire: 38
Çankaya - Ankara / Türkiye
☎: +90 (312) 295 62 48
☎: +90 (312) 295 62 00

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ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
CSP	Corporate Responsibility Projects
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGI	Focus Group Interview
IFC	International Finance Corporation
HES	Hayat Eve Sığar (Life Fits Home)
HRS	Human Resources Specialist
İŞKUR	Turkish Employment Agency
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PPM	Public Participation Meeting
SEP	Stakeholder Engagement Plan
TKYB	Türkiye Yatırım ve Kalkınma Bankası

1 INTRODUCTION

This plan presents the Environmental and Social Management Plan (ESMP) for the ‘ASAŞ Aluminum Extrusion Production Facility, ASAŞ Composite Panel Production Facility, ASAŞ PVC Profile and Roller Shutter Production Facilities, and ASAŞ Aluminum Flat Rolled Product Production Facility’ (hereinafter ‘the Production Facilities’) which are integrated facilities and has been prepared by 2U1K Engineering and Consultancy Inc. on behalf of “ASAŞ Aluminum Inc.” (hereinafter ‘the Facility Owner’).

The Facility Owner seeks potential financing from Türkiye Kalkınma ve Yatırım Bankası (TKYB) for the working capital needs. Therefore, the Facility Owner has appointed 2U1K for the preparation of ESMP in line with “International Finance Corporation (IFC) Performance Standards (PS) and National Legal Requirements’ and AIIB (Asian Infrastructure Investment Bank)’s Environmental and Social Standards (ESSs).

There are 4 Production Facilities within the scope of the finance loan. The Facility Owner plans to use this loan to supply raw materials to its Production Facilities. Therefore, no construction will be carried out within this scope.

This SEP has been prepared in line with the IFC's PSs and AIIB ESSs. In accordance with the IFC PSs and AIIB ESSs, the purpose of the SEP is to guide the Facility Owner to:

- build and maintain a constructive relationship with the stakeholders, in particular affected communities,
- promote improved environmental and social performance through effective engagement with the stakeholders,
- promote and provide means for adequate engagement with affected communities and to ensure that meaningful environmental and social information is disclosed to them and other stakeholders,
- ensure that all stakeholders have ways to access information and raise issues,
- ensure that affected communities have accessible means to raise issues and grievances, and the Facility Owner respond to and manage such issues and grievances appropriately.

This SEP includes; (i) the identification of stakeholders for the Production Facilities, (ii) analysis of relationships of the stakeholders with the Production Facilities, (iii) details of consultation methodologies, (iv) activities carried out to-date and those planned for the future of the Production Facilities, (v) details of the process for managing stakeholders’ concerns and grievances, and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

The Facility Owner is committed to implement this SEP throughout all stages of the Production Facilities. The SEP is a living document and it will be regularly monitored, reviewed, and updated by the Facility Owner.

2 ABOUT THE FACILITY OWNER

ASAŞ is one of the most remarkable industrial enterprises in Turkey and export to over 90 countries. The Facility Owner enhances its knowledge in production with design and product development and presents its high-quality products to the market under its brands. The Facility Owner has a wide range of products for the construction market under its brands; ASAŞPEN (PVC door and window systems), NATURALBOND (aluminum composite panel), ALUDES (aluminum flag and lighting poles), RESCARA (aluminum door, window and curtain wall systems), NATUROLL (roller shutter systems, garage doors, and motor control systems).

The Facility Owner holds ISO 14001, ISO 16949, ISO 9001, ISO 27001, ISO 50001, and OHSAS 18001 quality certificates and ISO 10002 Customer Satisfaction Management Certificate in compliance with the international norms and standards.

The Facility Owner has 4 Production Facilities where all located in the Industrial Zone of Sakarya to operate aluminum profile systems, composite panels, PVC window, and door systems, roller shutter and garage door systems and aluminum flat rolled products.

- **Aluminum Profile and Composite Panel Production Facilities:** Open Area: 270.000m², Closed Area: 130.000m²
- **PVC and Roller Shutter Production Facilities:** Open Area: 60.000m², Closed Area: 35.000m²
- **Aluminum Flat Rolled Products Production Facilities:** Open Area: 310.000m², Closed Area: 135.000m²

Currently, 2,615 people are working in ASAŞ and additionally, 80 people are planned to be employed because of the increasing demand for ASAŞ's products. The existing Production Facilities provides cafeterias, dining halls, toilets, dressing, and recreation rooms for the employees.

3 THE LOCATION OF ASAŞ

The Production Facilities are located within the borders of Organized Industrial Zone at Akyazı and Karapürçek Districts of Sakarya Region.

- Aluminum Extrusion and Composite Panel Facilities, PVC Profile and Roller Shutter Production Facilities are located on Kışla Alanı Street No: 2-2/1, 54400 Akyazı - Sakarya / Turkey
- Aluminum Flat Rolled Production Facility is located on Fabrikalar Street No. 50, 54400 Karapürçek - Sakarya / Turkey

The Production Facilities have a total area of 923,000 m² in which 300,000 m² of this area is confined space. The ownership of the Facility Area is on behalf of ASAŞ Aluminum Inc. The land acquisition started in March 2018 and was completed in August 2020.

The Facility Owner operates in the field of production activities stated above. The raw material needs to be met within the scope of the finance loan does not require the construction phase. In other words, there will be no new construction within this scope and the existing areas will be used for the implementation.

Below, the Figure 1 presents the location of the Production Facilities.

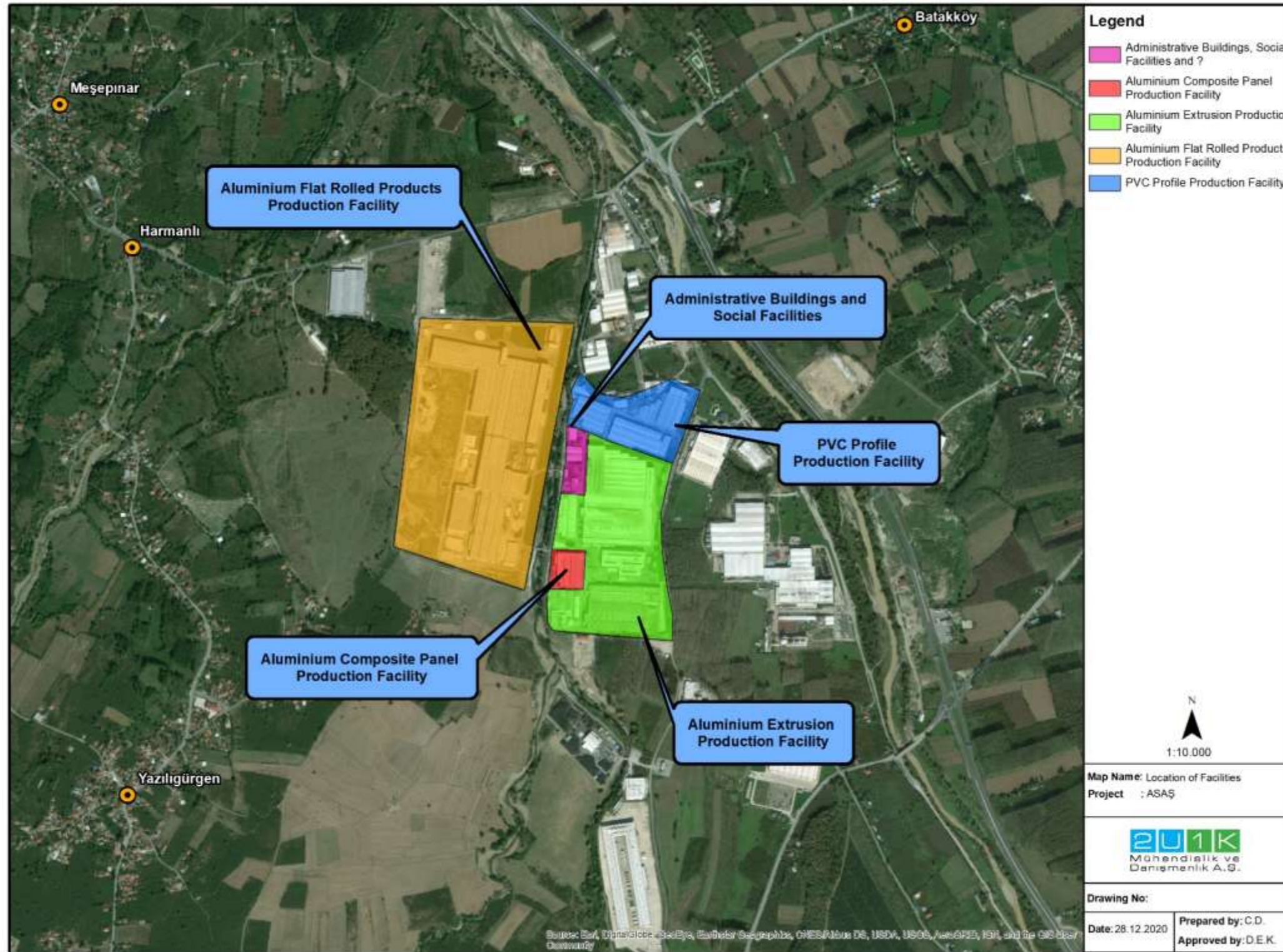


Figure 1. Location of the Figure

4 REGULATORY REQUIREMENTS

This section outlines the regulatory framework for the Production Facilities' stakeholder engagement activities, according to national and international requirements.

4.1 Turkish Legislation

The "Regulation on Environmental Impact Assessment (dated November 25, 2014; No: 29186 and amended on May 26, 2017; No: 30077)" defines the administrative and technical procedures and principles to be followed throughout the EIA process.

According to EIA Regulation, a Public Participation Meeting (PPM) is not required for the Production Facilities in line with the 24th Article of the Regulation.

Specific Objectives of PPM according to regulation is presented in Box 3-1.

Box 4-1. Specific Objectives of National EIA Regulation of Turkey (25.11.2014, Article-9)

- 1) *In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification is given institution/organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.*
- a) *The competency issued institutions/organizations by the Ministry will publish the meeting date, time, and place through a widely published newspaper at least ten (10) calendar days before the determined date for the PPM.*
- b) *Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions, and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.*
- 2) *Governorship will announce the schedule and contact information regarding public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.*
- 3) *Members of the Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.*
- 4) *The competency-issued institutions/organizations by the Ministry could provide studies as brochures, surveys, and seminars or through the internet in order to inform the public before the Public Participation Meeting.*

4.3 International Standards

This report is based on the relevant IFC PSs, AIIB ESSs and guidelines as international requirements.

The IFC is an international financial institution that offers investment, advisory, and asset management services to encourage private sector development in projects. It was established in 1956 as the private sector arm of the World Bank Group to advance economic development by investing in strictly for-profit and commercial projects which reduce poverty and promote development. To provide a means of managing the social and environmental risks and impacts on projects, the IFC has developed its Performance Standards on Social and Environmental Sustainability (amended in 2012). The Performance Standards are designed to help avoid, mitigate, and manage risks and impacts as a means of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities. In other words, IFC requires the Contractor to carry out an environmental and social assessment of Project-related impacts according to the PSs, which are listed as follows:

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

The following guidelines of the IFC, which are deemed relevant to the Project, to be followed during this study are as follows:

- The IFC General EHS Guidelines, dated April 30th, 2007;
- World Bank Group's EHS Guidelines for Water and Sanitation,
- IFC Performance Standards Environmental and Social Management System Implementation Handbook Metal Products Manufacturing

AIIB is an international organization that provides a multilateral regional financing and investment platform for infrastructure development and enhanced interconnectivity in Asia. The Bank's goal is to increase the pool of multilateral development support available to regional economies for infrastructure development and improvement. In doing so, the Bank

cooperates closely with other multilateral development banks and bilateral development organizations; and its financing complements and supplements their efforts.

According to AIIB's Environmental And Social Framework , AIIB recognizes that environmental and social sustainability is a fundamental aspect of achieving outcomes consistent with its mandate to support infrastructure development and enhance interconnectivity in Asia. The objective of this overarching policy is to facilitate achievement of these development outcomes, through a system that integrates sound environmental and social management into Projects.

The following three associated AIIB's Environmental and Social Standards (ESSs), which set out more detailed mandatory environmental and social requirements relating to the following:

- ESS 1: Environmental and Social Assessment and Management (AIIB ESS 1);
- ESS 2: Involuntary Resettlement (AIIB ESS 2); and
- ESS 3: Indigenous Peoples (AIIB ESS 3).

4.4 Gaps Between Turkish Legislation and International Guidelines

An Environmental Impact Assessment (EIA) has been prepared, disclosed and consulted upon during its preparation according to Turkish standards. Based on it, a comprehensive set of Environmental and Social instruments, inclusive of an Environmental and Social Impact Assessment (ESIA), an Environmental and Social Management Plan (ESMP), a Stakeholder Engagement Plan (SEP) are being prepared according to IFC PRs and AIIB ESSs. This document was initiated with a gap analysis between that EIA and the applicable IFC PRs and AIIB ESSs. The most prominent topic, which requires further elaboration in Turkish Environmental Legislation, is "Social Impact Assessment (SIA)". Additional studies and implementations are required in this topic for internationally financed projects to achieve alignment with international standards. The Turkish EIA procedures are, with some exceptions, in line with the IFC PSs and AIIB ESSs. The primary exceptions are in project categorization, the scope of environmental and social assessment, and public consultation. In cases where the Turkish legislation differs from the IFC PSs and AIIB ESSs, the more stringent one will be applied to the project implementation.

Gaps Between AIIB and Turkish Legislation: AIIB ESS 1 requires that the assessment process be supported by effective information disclosure and consultation with a grievance mechanism in place and the scope of the assessment should include vulnerable groups, access to resources, impacts on livelihood, resettlement, cultural resources, working conditions, and community health and safety. The Turkish EIA Regulation does not stipulate implementation of the establishment of a Grievance Mechanism. However, these are required by AIIB ESS 1. Such differences will be taken into consideration in respective sections in the SEP.

5 ROLES AND RESPONSIBILITIES

The Facility Owner will make sure that all affected parties, particularly affected settlements, the local community, neighboring facilities, and local governmental agencies are informed about the Production Facilities and will be involved in the process of identifying the important issues of the Production Facilities. Roles and responsibilities have been defined in order to ensure effective stakeholder engagement during the life of the Production Facilities.

Table 5-1. Key Roles and Responsibilities

Roles	Responsibilities
General Manager and Board of Management	Ensures that this SEP is implemented Provides necessary resources for effective implementation of this Plan
Facility Manager	Ensures that this SEP is implemented Provides necessary resources for effective implementation of this Plan Coordinates with parties for effective implementation of this Plan
Human Resources Department	Implements and improves this SEP Determine necessary resources for effective implementation of this SEP and submits it to his line managers Evaluate the compliance of Production Facilities activities with national and international legislation requirements Develop and publicize the grievance management procedures Act as the key point of contact to bring grievances from, locals, and governmental officials, NGOs, and other interest groups Address the complaints to necessary parties when necessary Receive, review, investigate, and keeping track of grievances Forwards the received grievances to the related departments of the Production Facilities for the resolution of the grievance Monitor and evaluate the fulfillment of arrangements achieved through the grievance procedure Ensure the Grievance Mechanism is reviewed on a regular basis as a result of changes to employment legislation and lessons learned from its operation; Communicate the Grievance Mechanism to all Subcontractor employees through means of communications structured for the Production Facilities Ensure the Grievance Mechanism is a dedicated topic during the new employee orientation; Provide confidential advice to employees on matters they are reluctant to discuss with their Supervisor or any other member of Subcontractor Management; and, Provide advice and support to Subcontractor supervisors and management on their roles and responsibilities for the successful implementation and operation of the Grievance Mechanism Conduct external reporting to the public, summarizing facility progress in order to maintain good stakeholder engagement, implement Good industry practice, Continue to engage with stakeholders to maintain community development facility to avoid negative social impacts and increase positive public perception of Facility Owner.

Roles	Responsibilities
Environmental, Health and Safety (EHS) Specialist Occupational Health and Safety (OHS) Specialist	Implements and improves this SEP Determines necessary resources for effective implementation of this SEP and submits to his line managers Evaluates the compliance of Facilities' activities with national and international legislation requirements, Searches the causes of the social incidents that cause; injuries, delays, or stoppage in the work and disputes among Facilities and communities Monitors all grievances and ensure that all complaints are resolved and closed, Coordinates with parties for proper implementation of this SEP Reports grievances, which are received or observed verbally, to Manager Investigates and proposes an appropriate methodology for resolving the grievance, Conducts follow ups for the results of complaints and reports on a weekly, monthly and annual basis to the Management,

6 PROJECT STAKEHOLDERS

For the purposes of this SEP, a stakeholder is defined as any individual, organization, or group which is potentially affected by the Production Facilities or which has an interest in the Production Facilities and its impacts. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“affected parties”) or have an interest in the Production Facilities (“other interested parties”).

It is important that a particular effort is made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Production Facilities or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update.

The SEP defines a stakeholder as ‘any individual or group who may be directly or indirectly affected by the Production Facilities, as well as those who may have an interest in or influence over the facilities. The process also aims to identify which stakeholder may have a positive or negative impact or influence on the facility.

Stakeholder identification has been an on-going process and different issues are likely to concern different stakeholders. Therefore, stakeholders have been grouped based on their connections to the facilities. Understanding the connections of a stakeholder group to the facilities helps identify the key objectives of the engagement.

Table 6-1 presents the interested and affected stakeholders within the scope of the Production Facilities.

Table 6-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected Party	Interested Party
Local Communities		
<ul style="list-style-type: none"> • Neighboring facilities at the Küçücek Industrial Zone of Sakarya • Neighboring kindergartens, primary, secondary and high schools • The village head and villagers of Yazılıgürgen Village 	√	√
Government / Authorities		
<ul style="list-style-type: none"> • Ministry of Energy • Ministry of Labor and Social Security • District Governorate of Akyazı and Karapürçek • Provincial Governorate of Sakarya • Sakarya Provincial Directorate of Environment and Urbanization • Sakarya Chamber of Commerce and Industry • District Health Directorate of Akyazı and Karapürçek • Ministry of Industry and Technology • Provincial Directorate of National Education • Organized Industrial Zones Supreme Organization (OSBÜK) 	√	√
Lenders		
<ul style="list-style-type: none"> • TYKB(Türkiye Yatırım ve Kalkınma Bankası) • AIIB (Asian Infrastructure Investment Bank) 	√	√
Municipality		
<ul style="list-style-type: none"> • Municipality of Akyazı • Municipality of Karapürçek • Municipality of Sakarya 	√	√
Employees of Facility Owner	√	√

7 STAKEHOLDER ENGAGEMENT TOOLS

A range of tools has been and will be used for stakeholder engagement within the scope of this Production Facilities. Stakeholder engagement will continue using these already established communication mechanisms, with new mechanisms employed as required to ensure efficient and effective engagement throughout the life of the Facilities. Production Facilities have and will continue to use the following methods for engaging with stakeholders:

- Informal / Formal face to face to face individual and community meetings – likely to be the primary form of on-going consultation throughout the Facilities' lifespan. This also includes organized or by the demand of community/public meetings.
- Facility Owner website – a publicly available site for announcements, documents, reports, etc.
- Grievance mechanism – aimed particularly at directly affected stakeholders. A mechanism has been and will continue to be widely disclosed to the affected public.
- Media advertisements – invitations to participate in meetings, information disclosure, etc.

8 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

8.1 Engagements with the Local Head of Neighborhoods

ASAŞ has not had an established grievance mechanism for public grievances. If any complaint and feedback received via online channels, the Finance and Administrative Specialist records this information for taking consideration of the Facility Owner.

Engagements with the Local Head of Yazılıgürgen: ASAŞ and its all facilities are located in Yazılıgürgen Village. The land acquisition process was conducted by the Facility Owner in the borders of Yazılıgürgen Village. In total 52 parcels, 265.7109m² of agricultural land has been acquired from 124 different landowners from Yazılıgürgen Village. Annex-3 contains the detailed list of land acquisition. The Facility Owner paid special attention to not damaging any residences during the construction phase.

8.2 Environmental and Social Field Study for ESMP

2U1K facilitated the Discussions with The Environmental Health and Safety (EHS) Manager, Occupational Health and Safety (OHS) Specialist, HSE Executive & Dangerous Goods Safety Advisor, Organizational Development Manager, and Employee Relations Manager to obtain information to prepare ESMP and related management plans on November 14, 2020.

Sociologist of 2U1K (Açelya Duman) interviewed the Employee Relations Manager and Administrative Affairs Specialist of the Facility Owner in order to any discrimination, working conditions, access to drinking water, and access to sanitary facilities, access to the grievance mechanism, wages, overtime, and compensation.

In addition to these interviews, 3 Focus Group Interviews (FGI) were conducted with a group of blue-collar workers, white-collar, and women workers. Each interview took at least twenty minutes and several questions were asked which are about working conditions, employee rights, grievance mechanism, and Covid-19. All workers responded comfortably and participated actively.

General Labor Conditions: Currently, there are 2583 direct employees and 35 subcontractor's workers for food services hired by the Facility Owner. The number of non-Turkish citizen workers is 3. The employment figures result is listed below:

Table 8-1. Employment Figures

	Female	Male	Total
Workers without Disabilities	242	2297	2539
Workers with Disabilities	7	69	76
Total	249	2366	2615

Local employment is a goal of the Facility Owner to hire people who live close to the place of work. It is beneficial for stakeholder engagement and transportation costs. Details of the local employment figures can be found below:

Table 8-3. Local Employment

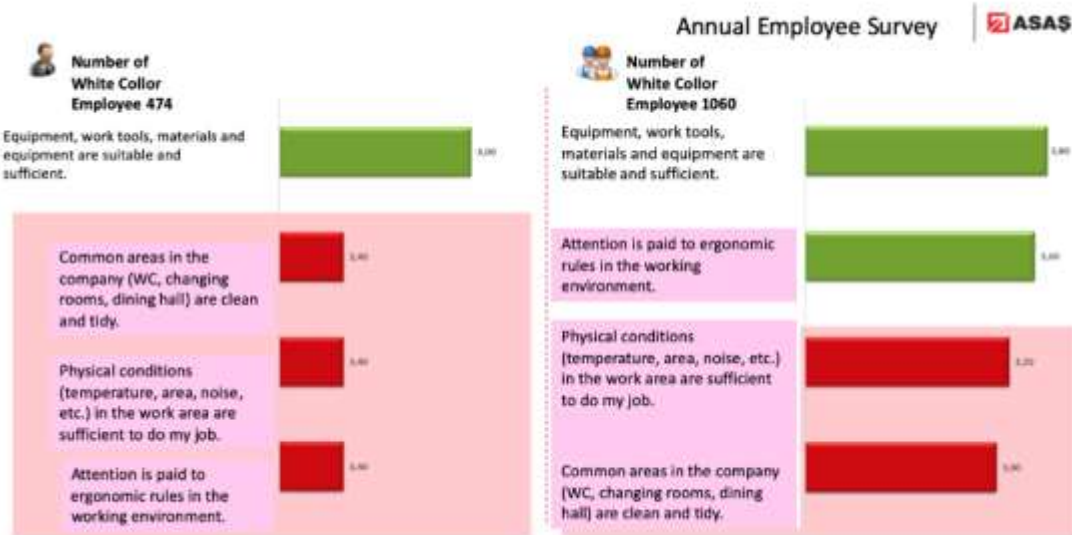
City	No of Employees
Sakarya	2183
İstanbul	235
Kocaeli	154
Düzce	11
Total	2583

All workers (including sub-contractors) are hired through contracts and wages and overtime payments are paid accordingly. The Facility Owner provides personal protective equipment (PPE) and clothing for workers; including face masks and disinfectants along with the pandemic.

During the interviews, it was asked about workers unions. As informed, workers are not member of any unions. That is why there is no workers union to represent the collective interest of the workers, accordingly, any selected workers' representative is not present.

All workers have access to transportation services provided by the Facility Owner. The Facility Owner hires a local cooperative for transportation services which is called the Köprücek Cooperative Number 29. Before Covid-19, 40 shuttles were launched daily basis. According to COVID-19 related restrictions in Turkey, 70 shuttles work for the Facility Owner currently. For all facilities, each worker has access to food, cleaning, transportation services. Each facility has its dining hall, dressing room, canteen, and workers' recreation room. During FGIs, workers did not mention any dissatisfaction with working conditions; except for food service. The Facility Owner is informed of this situation via the Annual Employee Survey. The question about the Cafeteria Environment was scored relatively low that is why the Facility Owner will take related actions to better food services and other issues. The survey result is shown below:

Table 8-4. Annual Employee Survey



During the women employee FGI, they underlined that all workers are treated the same and there is no limitation for women workers. Sanitary facilities are located within the same buildings and provided separately for men and women.

Each facility of the Facility Owner has a medical center with health experts and two permanent contract doctors being available. Due to the pandemic, a new medical center has been created only for Covid-19 controls. According to the interviews, there have been no fatal/major work accidents in the history of all facilities since 2016.

Recruitment: The blue-collar employees are mainly hired through an in-person application. Local applicants who are applying for a particular job position by filling out job application forms and these forms are collected in the applicants’ pool. Due to this applicant pool has been growing which makes it easier for potential employees to both find the position and apply to them. On the other hand, white-collar employees are hired through a hiring agency web-site (www.kariyer.net).

All workers are required to provide criminal records, Social Security Institution service breakdown, place of residence, family declaration, and health checks. All workers go through 3-days HR/EHS/OHS training before the start of work. The HR department provides information on topics including;

- About the Facility Owner
- Facility Background
- About the Human Resources Department of the Facility Owner
- Ethics Committee
- Code of Conduct
- Dress Code
- Worker's Rights including Workers Grievance Mechanism

Human Resources Department: There is an established Human Resources Department of the Facility Owner which works efficiently. Following procedures are provided by the HR department as:

- Human Resources Procedures
- Performance Evaluation Procedure
- Recruitment Procedure
- Career Management Procedure
- Employee Satisfaction, Motivation, and Reward Procedure
- Personal Data Protection (KVK) Procedure
- Internal Grievance Procedure
- Subcontractor Management Procedure
- Code of Conduct

ASAŞ Portal is a digital portal that comprises ASAŞ's HR instruments; project management systems, employee profiles, training management, overtime management, corporate performance management, allowance management.

ASAŞ Academy is an internal digital organization that fully meets the HR development need following ASAŞ's vision and strategic goals with a proactive approach. ASAŞ Academy contains several obligatory e-trainings that should be completed by workers; including a code of conduct, energy efficiency.

Additional Employee Benefits are considered satisfying by workers. According to employees' choice, food or dressing aid are made six times a year, educational and child allowance and annual bonuses. Training during the recruitment period also covers all the legal rights and liabilities of workers. These benefits are shown below figure:



Figure 8-1. Additional Employee Benefits

ASAŞ Benim is the strategy of Facility Owner to assist employees for having ASAŞ culture. In line with this strategy, it is aimed to develop employee loyalty, satisfaction, and productivity, and performance.

"Rewarding Success " is a part of ASAŞ Benim strategy is to make the employee's success visible with expanding participation and encouragement.

Grievance Mechanism: The Human Resources Department already established communication and internal complaint/suggestion mechanism for all workers. There are suggestion boxes placed throughout all facilities and the HR department can collect grievances and requests through ASAŞ Portal to monitor all feedback received by the employees. Internal grievance records are listed below:

Table 8-5. 2020 Internal Grievance Records

YAK: Instant Quality On Site		GRIEVANCE RECORDS										
Notification No	Explanation of Notification	Location	Notification Type	Situation	Box Opening Date	Box Opened By	Evaluation of the Notification	Evaluation Date	Evaluation Made By	Action Taken	Action Situation	
1	Natural gas stoves do not burn in the mechanical process saw press section / the upper part of the entrance door is broken which is located mechanical operation		Ekt.	Grievance	General Situation	7.01.2020	MERSONMEZ	The issue has been previously resolved in YAK.	8.01.2020	MERSONMEZ- HSALIM	The agenda was made in YAK dated 02.01.2020. B door was completely replaced and a tarpaulin door was made.	Closed
2	The driver, named Gökhan, who owns the vehicle in the 8-16 shift in the morning, makes a lot of phone calls every day while driving, creating the safety risk.		Ekt.	Grievance	General Situation	7.01.2020	MERSONMEZ	The subject was sent to the Administrative Affairs Directorate. The agenda will be discussed in Yak	8.01.2020	MERSONMEZ- HSALIM	On the YAK agenda dated 14.01.2020: The driver was warned by the Administrative Affairs. In case of repetition, a fine will be imposed.	Closed
3	Lack of information in the facility		Ekt.	Grievance	General Situation	7.01.2020	MERSONMEZ	The reason for the complaint was not understood that is why it was not processed.	8.01.2020	MERSONMEZ- HSALIM	No action took	Closed
4	Dressing room fans do not work	Yası		Grievance	General Situation	7.01.2020	MERSONMEZ	Discussed at Yak on 07.01.2020.	8.01.2020	MERSONMEZ- HSALIM	YAK dated 7.01.2020 was also discussed. No action took regarding ceiling tiles, due to they will be demolished within 1 month. Air conditioning problem was solved by Maintenance Manager	Closed
5	Insufficient heating of dressing rooms	Yası		Grievance	General Situation	7.01.2020	MERSONMEZ	Discussed at Yak on 07.01.2020.	8.01.2020	MERSONMEZ- HSALIM	YAK dated 7.01.2020 was also discussed. No action took regarding the ceiling tiles due to they will be demolished within 1 month. Air conditioning problem was solved by Maintenance Manager	Closed
6	Insufficient heating of dressing rooms	Yası		Grievance	General Situation	7.01.2020	MERSONMEZ	Discussed at Yak on 07.01.2020.	8.01.2020	MERSONMEZ- HSALIM	YAK dated 7.01.2020 was also discussed. No action took regarding the ceiling tiles due to they will be demolished within 1 month. Air conditioning problem was solved by Maintenance Manager	Closed
7	Not enough salt shakers on the tables in the dining hall	Yası		Grievance	General Situation	3.02.2020	MERSONMEZ	Packet salts will be replaced instead of salt shakers.	3.02.2020	HSALIM		Closed
8	Foreign objects in the meals	Yası		Grievance	General Situation	3.02.2020	MERSONMEZ	The subject was discussed with the Administrative Affairs	3.02.2020	MERSONMEZ-		Closed
9	Food in the dining hall is very bad	PVC		Grievance	General Situation	4.02.2020	MERSONMEZ	Due to the low quality of the complaint, no action took.	3.02.2020	MERSONMEZ-		Closed
10	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	5.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	MERSONMEZ-		Closed
11	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	6.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	MERSONMEZ-		Closed
12	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	7.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	MERSONMEZ-		Closed
13	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	8.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	MERSONMEZ-		Closed
14	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	9.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	HSALIM		Closed
15	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	10.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	HSALIM		Closed
16	Insufficient amount of multimarket cards is given in the terms of social aid	Yası		Grievance	General Situation	11.02.2020	MERSONMEZ	No action was taken due to it was the decision of the Management.	10.02.2020	MERSONMEZ-		Closed
17	Employees who make false statements about their chronic illness should be investigated.	Yası		Grievance	General Situation	11.05.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	14.05.2020	MERSONMEZ- HSALIM		Closed
18	Employees who abuse ASAŞ's goodwill should be disamed.	Yası		Grievance	General Situation	11.05.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	14.05.2020	MERSONMEZ-		Closed
19	Less people, much peace	Yası		Grievance	General Situation	11.05.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	14.05.2020	MERSONMEZ-		Closed
20	Religious holiday bonus should be given to employees who come to work under difficult conditions of Covid-19	Yası		Request	General Situation	11.05.2020	MERSONMEZ	The issue has been discussed with the management and no positive response has been received.	14.05.2020	MERSONMEZ- HSALIM		Closed
21	1000 TL bonus should be given to employees who come to work under difficult conditions of Covid-19	Yası		Request	General Situation	11.05.2020	MERSONMEZ	The issue has been discussed with the management and no positive response has been received.	14.05.2020	MERSONMEZ- HSALIM		Closed
22	Finding a solution to the air circulation of locker rooms and the odor problem of toilets during the pandemic period	Yası		Grievance	General Situation	11.05.2020	MERSONMEZ	The subject was discussed by the Administrative Affairs Directorate.	14.05.2020	MERSONMEZ- HSALIM		Closed
23	Doing something to appreciate employees who come to work during the pandemic	Yası		Request	General Situation	11.05.2020	MERSONMEZ	The issue has been discussed with the management and no positive response has been received.	14.05.2020	HSALIM		Closed
24	Putting disinfectant in the wards	Yası		Grievance	General Situation	11.05.2020	MERSONMEZ	The subject was discussed by the Administrative Affairs Directorate.	14.05.2020	MERSONMEZ-	Disinfectant are put in the wards	Closed
25	Profile service sharing the same car with the rolling service	Ekt.		Grievance	General Situation	11.05.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	14.05.2020	MERSONMEZ-		Closed
26	Alaç service sharing the same car with the rolling service, creating time and health problems	Ekt.		Request	General Situation	11.05.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	14.05.2020	HSALIM		Closed
27	The supervisor uses bad words and behaves in a disturbing manner	Ekt.		Grievance	General Situation	12.05.2020	MERSONMEZ	The issue was discussed in the BY disciplinary board.	14.05.2020	MERSONMEZ-		Closed
28	Vents in locker rooms never work and smell heavy	Yası		Grievance	General Situation	10.06.2020	MERSONMEZ	The subject was discussed by the Administrative Affairs Directorate.	10.06.2020	MERSONMEZ-		Closed
29	Taking a leave of absence during the pandemic	Ekt.		Request	General Situation	16.07.2020	MERSONMEZ	Gerekli tedbirler alınıp, izin hakkı tanınmıştır	16.07.2020	MERSONMEZ-		Closed
30	Injustice regarding wage and working conditions of blue-collar workers in the factory	Ekt.		Request	General Situation	6.07.2020	MERSONMEZ	Not evaluated within the scope of the complaint.	6.07.2020	HSALIM		Closed
31	Broken toilet seat in the women's toilet	PVC		Request	General Situation	13.07.2020	MERSONMEZ	The subject was discussed by the Administrative Affairs Directorate.	13.07.2020	MERSONMEZ-		Closed
32	Broken toilet seat in the women's toilet	PVC		Grievance	General Situation	13.07.2020	MERSONMEZ	The subject was discussed by the Administrative Affairs Directorate.	13.07.2020	MERSONMEZ-		Closed
33	No WC / bathroom in changing rooms and no tea distribution	PVC		Grievance	General Situation	28.09.2020	MERSONMEZ	An agenda has been created for HR YAK.	7.10.2020	MERSONMEZ-	YAK'da çözümlenmiştir.	Closed

In addition to these, another worker's social network system is called *I have an Idea*. The ideas of workers can be submitted both online and in writing. The online idea platform can be accessed through the ASAŞ Portal. Idea boxes are placed in the cafeterias of factories so that employees who do not have access to a computer can give their ideas. Employees who want to use these boxes can fill out the idea forms in the boxes and throw them into the boxes of ideas. These ideas in the boxes are collected periodically and recorded in the online idea collection system.

Security Services: The security team is directly employed by the Facility Owner. Unarmed security guards carry out their duties in security gates. Security guards also provide job application forms to blue-collar applicants for filling out and help visitors to watch induction videos.

Subcontractor Management: ASAŞ has environmental legal permissions and works following legal standards. According to these, subcontractors must comply with the standards requested by ASAŞ. The labor and working conditions of subcontractors are supervised by Human Resources and Employee Management. The Facility Owner has prepared the Occupational Health, Safety, and Environmental Management System for subcontractor companies.

COVID-19 Related Restrictions in ASAŞ: ASAŞ has been awarded the COVID-19 Safe Production Certificate issued by the Turkish Standards Institute (TSE). The Facility Owner implement health and safety measures at every stage, from the supply of raw materials to the delivery of the products to the customers. ASAŞ applies all measures within the scope of infection prevention and control action plans in all areas from the entrance and exit of the production facilities to personnel services, from dining halls to changing rooms.

ASAŞ monitors COVID-19 cases intently. The Table below shows the number of confirmed COVID-19 cases in ASAŞ.

Table 6-20. COVID-19 Confirmed Cases in ASAŞ

	Extrusion Facility	Flat Rolled Facility	Composite Panel Facility	PVC Facility
Total Number of Workers	1324	708	68	285
Positive Case	173	65	10	24
Percentage Rate	13,07%	9,18%	14,71%	8,42%

Medical officers and EHS Unit keep updated data. If a COVID-19 case occurs, Medical officers and EHS Unit inform related employees immediately. A rotating remote work schedule is creating for White-collar employees to work from home. Testing is recommended for all close contacts of confirmed or probable COVID-19 patients. Those contacts who test positive (symptomatic or asymptomatic) should be managed as a confirmed COVID-

19 case. If testing is not available, symptomatic close contacts should self-isolate and be managed as a probable COVID-19 case.

Following measurements are adopted by the Facility Owner during the pandemic:

- ASAŞ provided fuel assistance for workers during the first months of the pandemic. Workers, who did not prefer shuttles for transportation, used their vehicles to get work safely.
- In addition to the regular medical center, another medical center is prepared to manage Covid-19 related situations.
- According to COVID-19 related restrictions in Turkey, the number of shuttles is increased from 40 to 70.
- All workers participated in COVID-19 training. Additional information is shared with workers via ASAŞ Portal and SMSs.
- Posters on social distancing restrictions and Covid-19 related measures.
- Providing face masks and disinfectant sanitizer.
- Worker common areas have been re-designed to comply with social distancing.
- Food services have been re-established with single-use tools and divided tables to create individual dining spaces.
- Continuous hygiene routines throughout all facilities,
- The requirement of HES Code for all visitors and checking temperatures for everybody.

9 FUTURE STAKEHOLDER ENGAGEMENT

AIIB believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with borrowers to achieve this objectives. Stakeholder engagement should be conducted in a manner commensurate with the risks to, and impacts on affected people.

AIIB Environmental and Social Standard 1 (ESS 1) requires that environmental and social information of the Facility be made available to the public in an accessible and understandable form. Information disclosures and feedbacks received can provide opportunities to identify and address environmental and social risks and impacts of concern to the community, including community health and safety issues. AIIB and TKYB requires that ASAŞ will start regular consultations to disclose plans and progress and to gather expectations and concerns from stakeholders, following the guidelines below.

- Ensure that all parties have a voice in consultation, including national government, private sector, NGOs, and affected people;
- Provide additional support to ensure participation of women, elderly, young, disabled, minorities, and other vulnerable groups;
- Be gender inclusive, accessible, responsive, and tailored to the needs of vulnerable groups;
- Enable the consideration of relevant views of affected people and other stakeholders in decision making.
- The environmental and social instruments will include a comprehensive SEP.
- An established grievance mechanism for facility-affected people and workers, including direct ASAŞ employees and contractors and sub-contractors' employees, will be established in line with IFC PRs and AIIB ESSs.
- The environmental and social documentation in English and Turkish will be disclosed by ASAŞ on its website and in hard copies in the Facility affected areas. This documentation will also be disclosed on TYKB's website, and AIIB's website will include links to the documentation on ASAŞ's website and TKYB's website.

Stakeholder engagement will continue throughout Facilities' lifespan. Key stakeholders will be kept informed about the progress of the Production Facilities, have the opportunity to provide feedback on the effectiveness of mitigation and enhancement measures, and to raise any concerns or grievances.

Information to be shared with the implementation of this Report will include (but is not limited to) the following:

- the impacts that have been identified as a result of the Production Facilities,
- the impacts and mitigation or enhancement measures that are being implemented,
- roles and responsibilities,

- monitoring and management measures, and
- information on the grievance mechanism for the Production Facilities.

To ensure effective stakeholder engagement, the following measures will be taken into consideration by the Facility Owner;

- SEP will be translated to Turkish and distributed to all affected neighborhoods and interested stakeholders,
- the SEP will be reviewed annually by the Human Resources Department,
- The Facility Owner will engage with the affected stakeholders and other interested parties as structured by this Plan.

The Human Resources Department will be responsible for engagement with stakeholders as an on-going process throughout the life of the Facilities.

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders.

The Facility Owner has formally established an internal Complaint / Suggestion Mechanism. This will provide a formal and on-going avenue for stakeholders to engage with the Production Facilities. With the implementation of this report, a formal grievance mechanism will be established for internal/external stakeholders at no cost and will not impede access to other judicial or administrative remedies.

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as the Facility Owner's web-site, letters, and face to face meetings with the implementation of the Stakeholder Engagement Plan. The Stakeholder Engagement Monitoring Schedule can be developed according to ASAŞ's needs as shown in the Table below.

Table 10-1. Stakeholder Engagement Monitoring Schedule

Stakeholder Groups	Scope	Frequency	Method and Materials
Local Communities <ul style="list-style-type: none"> Neighboring facilities at the Küçücek Industrial Zone of Sakarya Neighboring kindergartens, primary, secondary and high schools Mukhtar and residents of the Yazılıgürgen Neighborhood 	<ul style="list-style-type: none"> Update of Facility activities and progress in detail Employment process Social responsibility projects Respond to the community's concerns on the Facility impact on public health through effective implementation and stakeholder engagement process. Conduct relevant meetings about public grievances, requests and feedbacks 	Biannual According to ASAŞ's Needs	Written brochures/ Posters updates Facility Owner's website Grievance mechanism Follow-up calls if contact details are available
Government <ul style="list-style-type: none"> Ministry of Energy Ministry of Labor and Social Security District Governorate of Akyazı and Karapürçek Provincial Governorate of Sakarya Sakarya Provincial Directorate of Environment and Urbanization Sakarya Chamber of Commerce and Industry District Health Directorate of Akyazı and Karapürçek 	<ul style="list-style-type: none"> Update of Facility activities and progress as requested Conduct relevant meetings about public grievances, requests and feedbacks Local procurement and employment data. 	Annual According to ASAŞ's Needs	Teleconference Virtual meetings Written updates Facility Owner's website Grievance mechanism
Municipality <ul style="list-style-type: none"> Municipality of Sakarya Municipality of Akyazı and Karapürçek 	<ul style="list-style-type: none"> Update of Facility activities and progress as requested Conduct relevant meetings about public grievances, requests and feedbacks Local procurement and employment data. 	Biannual According to ASAŞ's Needs	Teleconference Virtual meetings Written updates Facility Owner's website Grievance mechanism
ASAŞ Employees	<ul style="list-style-type: none"> Monthly check at campsite Grievance Mechanism implementations 	Continuous	Email to all employees /sms Virtual meetings Facility Owner's websites Written updates Grievance mechanism

Grievance procedures will be coordinated through the Human Resources Department, which is the primary interface between the community and the Facility Owner. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

The grievance mechanism will be advertised and announced to affected stakeholders so that they are aware of the process, know they have the right to submit a grievance, and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing, website¹ or by speaking with one of the Facility Owner's grievances officers. Further information on the Facility Owner's grievance mechanism is presented in Chapter 12 of this Report.

¹ <http://www.asastr.com>

10 CORPORATE SOCIAL RESPONSIBILITY PROJECTS

In line with its corporate social responsibility (CSR) activities, another target of ASAŞ is, to develop projects that integrate social and environmental concerns in its business operations and interactions with its stakeholders. CSR activities are listed below:

- ASAŞ Basketball Club
- Blood Donation for Patients Awaiting Stem Cell Transplant
- Turkish Social Service and Children Protection Institution Visits
- IVF (in vitro fertilization) Treatment Aids
- Supporting Regional Kindergartens
- Organizing Career Days for Local High Schools and Vocational Schools of Higher Education

ASAŞ founded ASAŞSANAT in 2015 to further improve its support in art. ASAŞSANAT operates as a learning, sharing, designing, and production platform that brings art and design students together with academics and professionals. ASAŞ aims to revive the change created by art in societies as well as the skill of having a different point of view in its organization through courses and seminars for the spouses and children of its employees, at the Art Workshop to be constructed in Akyazı/Sakarya Region.

11 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT DURING COVID-19

The unprecedented nature of the COVID-19 pandemic means that all aspects of the Facilities' operations may be impacted by it, including stakeholder engagement. Considering mandatory restrictions and social distancing measures associated with Covid-19 resulted in alternative approaches to stakeholder engagement in the short term.

In information dissemination efforts, the Facility Owner will seek to ensure that reliable, accurate information reaches all stakeholders, by making it available in readily understandable and culturally appropriate formats and language.

Following tools are recommended to be adopted by the Facility Owner to engage with stakeholders during the pandemic include but not limited to:

- Leaflets
- E-mail
- Community notice boards
- Phone calls and text messaging
- Facility Owner Website
- Social Media Platforms

Furthermore, COVID-19-driven changes to Facility Owner's operation that may have community impacts will be communicated accordingly. These may include, but are not limited to:

- Changes to project as a result of COVID-19;
- Changes to delivery of community development programs;
- Changes to employment, sourcing from local business, and so forth;
- Changes to timelines for resolving open grievance cases; and
- New or modified health awareness communication campaigns related to COVID-19 that are coordinated with relevant authorities and based on information from recognized sources, such as the World Health Organization.

At this stage, the Facility Owner already implemented measures in regards to Covid-19 to ensure a safe workforce and prevent negative impacts on community health and safety. Some of the measures already adopted by the Facility Owner are as follows:

- Training on occupational health and safety in regards to Covid-19,
- Provision of Covid-19 tests,
- Continuous hygiene routines throughout all facilities,
- The requirement of HES Code for all visitors,
- The information of the personnel entering the Facility is recorded and provide necessary personal protective equipment and inform them about social distancing.
- The mask, disinfectant, overalls, bonnet, and gloves are supplied to the personnel for use.
- Sensor disinfection dispensers were provided and installed in locations that everyone can see and reach.
- Worker common areas have been re-designed to comply with social distancing.
- Food services have been re-established with single use tools.
- Information banners have been placed within the Site to inform on Covid-19 related updates and measures.

Last, in order to ensure effective engagement during Covid-19, the Production Facilities will consider new approaches as shown in the Table below.

Table 11-1. Alternative Information Disclosure and Stakeholder Engagement Measures during Covid-19 Restrictions

Stakeholder Groups	Topics	Frequency	Method and Materials	Lead and Supporting Responsibility
Local Communities <ul style="list-style-type: none"> Neighboring facilities at the Küçücek Industrial Zone of Sakarya Neighboring kindergartens, primary, secondary and high schools Mukhtar and residents of the Yazılıgürgen Neighborhood 	<ul style="list-style-type: none"> Update of Facility activities and progress in detail Employment process Social responsibility projects Respond to the community's concerns on the Facility impact on public health through effective implementation and stakeholder engagement process. Facility measures to comply with social distancing. Measures to limit workforce or community interaction (for example, for a large expatriate workforce) Changes to current procedures (for example, grievance mechanism) 	Quaterly/ When needed	Written brochures/ Posters updates Facility Owner's website Grievance mechanism Follow-up calls if contact details are available	Facility Manager Human Resources Department
Government <ul style="list-style-type: none"> Ministry of Energy Ministry of Labor and Social Security District Governorate of Akyazı and Karapürçek Provincial Governorate of Sakarya Sakarya Provincial Directorate of Environment and Urbanization Sakarya Chamber of Commerce and Industry District Health Directorate of Akyazı and Karapürçek 	<ul style="list-style-type: none"> Update of Facility activities and progress Local procurement and employment data. Updates on social distancing restrictions and Covid-19 related measures. 	Annual When needed	Teleconference Virtual meetings Written updates Facility Owner's website Grievance mechanism Grievance mechanism	Facility Manager Human Resources Department
Municipality <ul style="list-style-type: none"> Municipality of Sakarya Municipality of Akyazı and Karapürçek 	<ul style="list-style-type: none"> Update of Facility activities and progress as requested 	Biannual When needed	Teleconference Virtual meetings Written updates	Facility Manager Human Resources Department

Stakeholder Groups	Topics	Frequency	Method and Materials	Lead and Supporting Responsibility
	<ul style="list-style-type: none"> • Updates on social distancing restrictions and Covid-19 related measures. 		Facility Owner's website Grievance mechanism	
ASAŞ Employees	<ul style="list-style-type: none"> • Update of Facility activities progress and planning • Amendments to Facility-operating procedures and emergency response plans • Job security, changes to working conditions, and guidance on accessing government benefits (if available) • Actions to take if they develop Covid-19 symptoms • Location of specific centers for Covid-19 cases. • Updates on new workforce arrangements in regards to Covid-19 measures. 	Continuous When needed	Email to all employees Virtual meetings Teleconference Facility Owner's websites Written updates	Facility Manager OHS Team Human Resources Department

12 THE GRIEVANCE MECHANISM

Grievance mechanisms are an important part of both IFC and AIIB's approach to requirements related to community engagement by clients under the Policy, IFC PSs and AIIB ESSs on Social and Environmental Framework. The purpose of the Grievance Mechanism is foremost to give access to a problem-solving procedure to Facility affected people including affected communities and facility workers in the terms of international requirements.

According to IFC Good Practice, a grievance as a concern or complaint raised by an individual or a group within communities affected by company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations, and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or to a complaint may be in the specific approaches and the amount of time needed to resolve it. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between facility workers, local communities, and other stakeholders.

The structured Grievance Mechanism will ensure that grievances associated with the Facilities are addressed through a transparent and impartial process. From the early stages of the facilities lifecycle, the grievance procedure has been and will continue to be disclosed to the public through individual or group meetings, printed materials, notice boards.

The grievances will be acknowledged by the Human Resources Specialist (HRS) assigned by the Facility Owner and the timeframe for the provision of response or further consideration will mainly depend on the complexity of the issue raised, however, ideally, it is expected to not exceed 14 days after receiving the grievance.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the facilities lifespan.

All stakeholders initiating a grievance will have an opportunity to claim their case in a confidential manner. The Facility Owner will ensure that the name and contact details of the complainant are not disclosed without their consent.

12.1 Grievance Register

All incoming grievances will be reflected in a Grievance Log to assign an individual reference number.

The Grievance Log will also be used to track the status of a grievance, analyses the frequency of complaints arising, typical sources and causes of complaints, as well as to identify prevailing topics and any recurrent trends.

All complaints will be recorded in the respective Grievance Log with the following information:

- Grievance reference number,
- Date of the grievance,
- A location where the grievance was received and in what form (for grievance boxes),
- Complainant's contact details (in case of non-anonymous grievances)
- Content of the grievance,
- Parties responsible for addressing the issue,
- Dates when the investigation of the grievances initiated and completed,
- Results of the investigation,
- Information on the proposed corrective actions to be sent to complainant (in case of non-anonymous) and the date of the sent,
- Deadlines for required actions by the staff,
- Indication on whether the corrective action was satisfactory or a reason for non-resolution of the grievance,
- The of the close-out, and;
- Any outstanding actions for non-closed grievance cases.

12.2 Roles & Responsibilities

Responsibilities of HRS include but not limited to:

- Ensure the Grievance Mechanism complies fully with all employment legislation;
- Ensuring the Grievance Mechanism is reviewed on a regular basis as a result of changes to employment legislation and lessons learned from its operation;
- Communicate the Grievance Mechanism to all direct and indirect employees through means of communications structured for the Production Facilities
- Ensure the Grievance Mechanism is a dedicated topic during the new employee orientation;

- Provide confidential advice to employees on matters they are reluctant to discuss with their Supervisor
- Provide advice and support to Subcontractor supervisors and management on their roles and responsibilities for the successful implementation and operation of the Grievance Mechanism.
- Acceptance of issues from employees.
- Log of issues.

12.3 Grievance Procedure

12.3.1 Public Grievance Mechanism

ASAŞ is required to establish a public grievance mechanism, in accordance with applicable AIIB ESSs and IFC PSs. A suitable grievance mechanism to receive and facilitate resolution of the concerns or complaints of people who believe they have been adversely affected by the ASAŞ's environmental or social impacts, and to inform Facility-affected people of its availability. The grievance mechanism is scaled to the risks and impacts of the ASAŞ.

ASAŞ will design the mechanism to address affected people's concerns and complaints promptly, using an understandable and transparent process readily accessible to all affected people. The mechanism provides for maintenance of a publicly accessible case register, and reports on grievance redress and outcomes, which are disclosed in accordance with the applicable AIIB ESSs and IFC PSs.

Complaints should be reviewed as soon as possible in order to prioritize resolution. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, an urgent safety issue or where it concerns the livelihood of locals.

There are 10 steps that complete the grievance mechanism. This process has been detailed in the text below.

Step 1: Identification of grievance through personal communication with appropriately trained and advertised by HRS.

This could be in person, by phone, letter, grievance boxes, or email using the contact details below:

- Name: Şerife Yaşar
- Tel: +90 (0216) 680 07 80
- Mail: info@asastr.com

Step 2: Grievance is recorded in the 'Grievance Log' (paper and electronic) within one day of identification. The grievance log will be managed by the assigned HRS. The significance of the grievance will then be assessed within five to seven days.

Significance Criteria is outlined in the list below.

- Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g. when a national or international law is broken (see Level 3).

- Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc.).
- Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Facility Owner's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

In the case the complaint is assessed to be out of the scope of the Grievance Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

Step 3: Grievance is acknowledged through a personal meeting, phone call, grievance boxes, or letter as appropriate, within a target of 14 working days after submission (except the complaints that require immediate attention). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

Step 4: The HRS is notified of Level 1,2 or 3 grievances the Facility Manager is notified of all Level 3 grievances. The senior management of Facility Owner, as appropriate, supports the HRS in deciding who should deal with the grievances and determines whether additional support for the response is necessary.

Step 5: The HRS delegates the grievance within five to seven days via e-mail to the relevant department(s)/personnel to ensure an effective response is developed (e.g., human resource, relevant administrative departments, etc.)

Step 6: A response is developed by the delegated team within 14 days in which may include HRS with input from senior management of related departments as necessary. The response should identify a suitable resolution to the grievance, which could involve further information to clarify a situation, taking measures to mitigate problems or compensate for any damages that have been caused during the facility activities through financial compensation.

Step 7: The response is signed-off by the senior manager of related departments for level 3 grievances and the HRS for Level 2 and Level 1 grievances within 14 days. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the HRS and referred to in the grievance log.

Step 8: Communication of the response should be carefully coordinated. The HRS ensures that an approach to communicating the response is agreed upon and implemented.

Step 9: Record the response of the complainant to help assess whether the grievance is closed or whether further action is needed. The HRS should use appropriate communication

channels, most likely telephone or a face to face meetings, to confirm whether the complainant has understood and is satisfied with the response.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located around the Facility as well as within the affected villages and HRS should contact the head of villages on the anonymous grievances and resolutions as well.

If possible, the complainant's response should be recorded in the Grievance Log including notes on the mitigation measures to prevent recurrence of the grievance in the future.

In case the HRS or other managerial department is not able to address the particular issue raised through the grievance mechanism HRS will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation of how the person that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

Step 10: Close the grievance with a sign-off from the HRS. The HRS assesses whether a grievance can be closed or whether further attention is required. If further attention is required, the HRS should return to Step 2 to re-assess the grievance. Once the HRS has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the related management departments for level 3 grievances, to approve the closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which will be filed by the HRS and referred to in the grievance log.

12.3.2 Worker Grievance Mechanism

AIIB and TKYB recognizes the important role played by workers and their representatives in the development process and their contribution to sustainable economic growth. It is important to implement that the following measures contribute to the quality of ASAŞ: providing workers with living wages, safe and healthy working conditions and putting measures in place to prevent accidents, injuries and disease; having good human resources management; and having a sound labor management relationship based on equal opportunity, fair treatment, non-discrimination, freedom of association, and access to grievance mechanisms, consistent with the national law (including international agreements adopted by the member) governing the Facility.

ASAŞ aims to realize these measures to provide these adequate working conditions to all employees (including subcontractors' workers.). In contrary situations, the workers grievance mechanism come into play. This is a procedure through which a grievance can be raised, assessed, investigated and responded to. It is also a framework through which workers can gain access to remedy for adverse impacts or damage they have suffered as a result of business activities.

Worker Grievance Mechanism is defined as complaints from employees (including both direct and indirect employees).

This mechanism is structured with an intention of it being an effective approach for early identification, assessment, and resolution of grievances throughout the facilities' lifespan. The Grievance Mechanism should guarantee that any employee raising a complaint will not be subject to any reprisal.

The scope of the Worker Grievance Mechanism can be summarized as but not limited to; any worker with a concern of pertaining to onsite work such as occupational health and safety, terms of employment, wages, issues with the local community or among co-workers, hygiene issues in the common areas, an insufficient amount of food and/or concerns regarding the security of the workers.

The Grievance Mechanism will be informed to all workers through written and verbal communications. Each worker should be informed about the grievance mechanism at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is quite significant to some workers; therefore, workers can submit their complaints and remain anonymous. However, grievances lodged anonymously may prevent the Human Resources Specialist of the Facility Owner from resolving the matter and providing feedback. Nevertheless, workers wishing to lodge grievances anonymously should be allowed to do so. The Human Resources Specialist will open the complaint boxes located within the Facility every 5 days and will assess to determine whether the issue raised by the complaint falls within the scope of Worker Grievance Mechanism or not.

It is important to note that, facility employees will retain their right to access the public grievance mechanism for non-employment-related issues.

Complaints should be reviewed as soon as possible in order to prioritize resolution. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, where it concerns the livelihood of workers.

There are 5 steps that complete the Worker Grievance Mechanism. This process has been detailed in the text below.

Step 1: Identification of grievance will be done through personal communication with the Human Resources Specialist (HRS). This could be in person², by phone, letter, grievance boxes, or email.



Figure 2 One of Grievance Boxes in ASAŞ

Step 2: Grievance is recorded in the 'Grievance Log'. Once the grievance is received and recorded, based on the subject and issue, the HRS shall identify the department, management, or personnel responsible for resolving the grievance.

In the case the complaint is assessed to be out of the scope of the Production Facilities' Grievance Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

Step 3: Grievance Investigation. The HRS and related departments should then assess the facts relating to the grievance. This should be aimed at establishing and analyzing the cause of the grievance and identifying suitable mitigation measures. The analysis of the cause will involve assessing various aspects of the grievance such as the history of the employee, frequency of the complaint occurrence, management practices, recent incidents, etc.

During the cases when needed, for the sake of the investigation, the HRS may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. In the case of Facility, a visit is required to gain a first-hand

² In case of grievance is received directly by HRS or worker representative, it will be recorded directly in to the grievance Form. All Project staff will be informed that all grievances must pass to HRS as soon as possible.

understanding of the nature of the complaint, the visit will be also made to verify the validity and severity of the grievance.

The concern will be referred to the related managerial department who will discuss the concern with the employee and Area and/or Departmental Manager.

The investigation phase should be completed in no more than 5 working days of receiving the grievance.

Step 4: A Resolution and closure are developed based on the understanding that the HRS is developed in consultation with the related departments or management. The suitable resolution for the complaint should be accordingly communicated to the grievant within the 2 working days of completing the grievance investigation phase.

In case the issue is beyond the scope of the HRS, the grievance should be escalated to the Facility Management Unit to endeavour to resolve the grievances through managerial levels within the 7 working days of the escalation.

Step 5: Close the grievance with a sign-off or via electronic system from the HRS once the grievance is resolved and the same has been communicated to the grievant. As the Grievance Log will be updated, the current status of the grievance and understanding of the manner in how the grievance was resolved should also be reported in the Grievance Log. The intention of providing further information on the grievance log is to serve as a reference for any similar grievances that may arise in the future.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located within the Facility and common areas and should be announced through tool-box or weekly meetings.

13 MONITORING

The Facility Owner will implement the monitoring measures throughout the lifespan of the Production Facilities.

The SEP will be reviewed annually and updated if required according to the facility developments and the unexpected public reactions.

The grievance mechanism established for the Production Facilities will be used effectively and the statistical summary of the outputs of the grievance mechanism will be reported to the Facility Management and lenders.

The key performance indicators during the implementation of the SEP are provided in the Table 13-1 below.

Table 13-1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

No	KPI	Target	Monitoring Measure
1	Number of community grievances	The total number raised and reduced on year	Database
2	Number of complaints responded to within targeted time frame of one month	The target of 90%	Database
3	Reporting back to stakeholders on the implementation of the Grievance Mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure	Reporting
4	Internal auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed	Annual audit complete target of 90% of grievances closed out to satisfaction of complainant within one month	Audit report.

ANNEX - 1 Sample of Public Grievance Form

Date	
Full Name	<p><i>You can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent.</i></p> <input type="checkbox"/> I request non-disclosure of my identity information <input type="checkbox"/> I would like to submit ANONYMOUS claim
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By person:..... <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:..... <input type="checkbox"/> Other:.....
Province/Town/Settlement	
Category of the Grievance	
1. On assets/properties impacted by the facility	
2. Compensation (delay, value, discrimination, lack of information)	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (like pollution, dust, noise)	
6. Damage on the properties (on croplands, structure)	
7. Request for employment	
8. On traffic, transportation and other risks	
9. On health	
10. On the quality of life (security issues, cultural conflicts)	
11. Other (Please specify):	
Description of the Grievance (WHAT, WHEN, WHERE, WHY, IMPACT) Please briefly explain the cause-root of the complaint	

Have you ever filed a complaint on the same issue before?	
Do you know if any other locals are experiencing the same issue?	
Please state if you have any suggestions or options to resolve your complaint?	
Please do not fill this section of the form.	
To be filled out by the CRSD	
How was the comment received?	
<input type="checkbox"/> In-person	
<input type="checkbox"/> By phone	
<input type="checkbox"/> By mail	
<input type="checkbox"/> By grievance box number: (please include the box number)	
<input type="checkbox"/> Other (please describe)	
Grievance Registration Date:	Grievance Number:
Response Required:	Signature:
<input type="checkbox"/> Yes <input type="checkbox"/> No	

ANNEX - 2 Sample Grievance Closeout Form

Type of Grievance:	<input type="checkbox"/> Public	<input type="checkbox"/> Employee
Is the case urgent:	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Grievance closeout number:		
Date Submitted:		
Target Date for Resolution:		
Contact Information of the Stakeholder (if given)		
Desired Method of Contact:		
Description of the Grievance:		
Compensation Required?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Assessment of Grievance Level and Rationale:		
CONTROL OF THE REMEDIATE ACTION AND THE DECISION		
Stages of the Remediate Action	Deadline and Responsible Party	
1.		
2.		
3.		
4.		
5.		
6.		
Sign off:		
Date:		

In case the case was non-anonymous Is the complainant satisfied with the corrective action taken to address the grievance?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:	
Is the grievance resubmitted?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:	
New Grievance Number		Date Resubmission: of	
Grievance Closure: To be Completed by Non-Anonymous Complainant			
Name of the Complainant:			
Are you satisfied with the corrective measures taken for your grievance?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:	
Signature of Complainant:	Date:		
To be Completed by Grievance Officer			
Are you satisfied that this grievance has been resolved?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:	
Signature of HRS	Date:		

ANNEX-3 Land Acquisition List

DETAILED LAND ACQUISITION LIST OF AKYAZI KARAPÜRÇEK YAZILIGÜRGEN PARCELS							
NO	DATE	PARCEL	MAP SECTION	SHARE HOLDER		SHARE RATIO	M2
1	15.03.2018	*	*	*	*	Tam	715
2	15.03.2018	*	*	*	*	1/5	8.700
				*		1/5	
				*		1/5	
				*		1/5	
				*		1/5	
3	15.03.2018	*	*	*	*	Tam	3.550
4	15.03.2018	*	*	*	*	1/2	86
				*		1/2	
5	15.03.2018	*	*	*	*	Tam	1.287
6	15.03.2018	*	*	*	*	Tam	3.059
7	15.03.2018	*	*	*	*	Tam	6.287
8	15.03.2018	*	*	*	*	Tam	3.350
9	15.03.2018	*	*	*	*	Tam	2.852
10	15.03.2018	*	*	*	*	Tam	4.400
11	15.03.2018	*	*	*	*	Tam	4.625
12	15.03.2018	*	*	*	*	Tam	13.800
13	15.03.2018	*	*	*	*	Tam	13.800
14	15.03.2018	*	*	*	*	Tam	1.434
15	15.03.2018	*	*	*	*	Tam	2.500
16	15.03.2018	*	*	*	*	Tam	3.150
17	15.03.2018	*	*	*	*	Tam	3.375
18	15.03.2018	*	*	*	*	508/3792	12.700
				*		381/3792	
				*		381/3792	
				*		381/3792	
				*		381/3792	
		*	*	*	*	Tam	11.000
19	16.03.2018	*	*	*	*	Tam	2.450
20	15.03.2018	*	*	*	*	Tam	2.250
21	16.03.2018	*	*	*	*	4/5	6.080
22	16.03.2018	*	*	*	*	2/9	2.434
				*		1/3	3.656
				*		11/5499	22
				*		11/5499	22
				*		1/9	1.219
				*		30099/1096712	300,99
				*		30099/1096712	300,99
				*		60197/1096712	607,97

				*		60197/1096712	607,97
				*		60197/1096712	607,97
				*		60197/1096712	607,97
23	16.03.2018	*	*	*	*	Tam	1.550
24	16.03.2018	*	*	*	*	Tam	1.800
25	16.03.2018	*	*	*	*	3/16	572
				*		3/16	572
				*		1/4	763
				*		3/16	572
				*		3/16	572
26	16.03.2018	*	*	*	*	1/4	94
				*		3/16	70
				*		3/16	70
				*		3/16	70
				*		3/16	70
27	2.05.2018	*	*	*	*	Tam	5.777
28	30.04.2018	*	*	*	*	Tam	1.366,07
				*		Tam	482,14
				*		Tam	482,14
				*		Tam	482,14
				*		Tam	482,14
				*		Tam	482,14
				*		Tam	482,14
				*		Tam	241,07
29	5.10.2018	*	*	*	*	1/6	1.066,67
				*		1/6	1.066,67
				*		1/6	1.066,67
				*		1/6	1.066,67
				*		1/6	1.066,67
				*		1/6	1.066,67
30	5.10.2018	*	*	*	*	Tam	2.500,00
31	5.10.2018	*	*	*	*	Tam	1.706,00
32	4.10.2018	*	*	*	*	1/3	2.233,33
33	4.10.2018	*	*	*	*	Tam	8.700,00
34	5.10.2018	*	*	*	*	1/18	155,56
				*		1/18	155,56
				*		1/6	466,67
				*		1/6	466,67
				*		1/6	466,67
				*		1/6	466,67
				*		1/18	155,56
				*		1/6	466,67
35	10.10.2018	*	*	*	*	Tam	14.350,00
36	5.11.2018	*	*	*	*	Tam	3.950
37	15.11.2018	*	*	*	*	Tam	4.050

38	27.11.2018	*	*	*	*	Tam	3.400
39	4.12.2018	*	*	*	*	Tam	6.400
40	28.12.2018	*	*	*	*	Tam	5.300
41	26.04.2019	*	*	*	*	Tam	4.269
42	26.04.2019	*	*	*	*	6/32	145,88
				*		13/32	316,06
				*		13/32	316,06
43	26.04.2019	*	*	*	*	6/32	176,44
				*		13/32	382,28
				*		13/32	382,28
44	10.01.2020	*	*	*	*	4/7	6.000,00
45	10.01.2020	*	*	*	*	Tam	1.653,00
46	10.01.2020	*	*	*	*	Tam	1.050,00
47	5.02.2020	*	*	*	*	3/16	3.225,00
				*		3/16	3.225,00
				*		4/16	4.300,00
				*		3/16	3.225,00
				*		3/16	3.225,00
48	5.02.2020	*	*	*	*	1/8	1.393,75
				*		1/8	1.393,75
				*		1/8	1.393,75
				*		1/8	1.393,75
				*		4/8	5.575,00
49	5.02.2020	*	*	*	*	1/4	1.587,50
				*		1/4	1.587,50
				*		1/4	1.587,50
				*		1/4	1.587,50
50	19.02.2020	*	*	*	*	Tam	5.600,00
51	21.08.2020	*	*	*	*	1/12	225,00
				*		1/12	225,00
				*		1/6	450,00
				*		1/6	450,00
				*		1/6	450,00
				*		1/6	450,00
52	21.08.2020	*	*	*	*	1/24	354,16
				*		1/24	354,16
				*		7/12	4.958,33
				*		1/12	708,33
				*		1/12	708,33
				*		1/12	708,33