



ASAŞ

ASAŞ ALUMINUM PRODUCTION FACILITY

STAKEHOLDER ENGAGEMENT PLAN (SEP)



ÇEVTAŞ RESEARCH TECHNOLOGY MINING ENGINEERING
CONSULTANCY LANDSCAPE EDUCATION CONSULTANCY
CONTRACTING TRADE LTD. CO.

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ANKARA

ASAŞ ALUMINUM PRODUCTION FACILITY STAKEHOLDER ENGAGEMENT PLAN (SEP)

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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

1 INTRODUCTION

This plan presents the Stakeholder Engagement Plan (SEP) for the ‘ASAŞ Aluminium Production Facility, ASAŞ Extrusion Production Facility, ASAŞ Composite Panel Production Facility, ASAŞ PVC Profile and Shutter Production Facility and ASAŞ Aluminium Flat Products Production Facility’ (referred to as the ‘Facilities’) and has been prepared by ÇEVTAŞ Research Technology Mining Engineering Consultancy Landscape Education Consulting Trade Ltd. Co. (referred to as ‘ÇEVTAŞ’) on behalf of “ASAŞ Aluminium Industry and Trade Inc. (referred to as ‘ASAŞ’)”.

2021, ASAŞ prepared an Environmental Social Management Plan (ESMP) in accordance with the “Performance Standards (PS) of the International Finance Corporation (IFC), the Environmental and Social Standards (ESS) of the Asian Infrastructure Investment Bank (AIIB), and National Legal Requirements” in order to seek potential financing from the Development and Investment Bank of Turkey for the existing facility. To date, ASAŞ has prepared a Stakeholder Engagement Plan in accordance with the IFC’s Performance Standards and the AIIB’s Environmental and Social Standards (ESS) (January 2021), ¹and this plan was later revised (August 2022) ². ASAŞ’s “Stakeholder Engagement Plans” are available on its official website .

This Stakeholder Engagement Plan was prepared by ÇEVTAŞ to assess the social situation for ASAŞ, establish conditions for stakeholder consultation, and eliminate/minimize potential negative social impacts before they arise. The SEP is a public document open to discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement. ASAŞ invites its stakeholders to actively participate in making this SEP an interactive and dynamic document. ASAŞ is committed 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 (January 1, 2012) ³. The SEP consists of the following components:

- Brief description about the investor;
- An overview of national legislation and international standards;
- Duties and responsibilities within the scope of SEP;
- Stakeholders of the facilities;
- Potential impacts/risks and mitigation measures;
- Tools for stakeholder consultation and engagement;

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>

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- Past and ongoing stakeholder engagement activities;
- Corporate social responsibility projects;
- Complaint mechanism;
- Monitoring activities.

2 ABOUT ASAŞ

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

International Standart of Organization 14001, International Standart of Organization 16949, International Standart of Organization 9001, International Standart of Organization 27001, International Standart of Organization 50001, and OHSAS 18001 quality certificates and International Standart of Organization 10002 Customer Satisfaction Management Certificate in accordance with international norms and standards.

ASAŞ has 4 Production Facilities located in the Sakarya Organized Industrial Zone, all of which are aluminum profile systems, composite panels, PVC window and door systems, shutter and garage door systems and aluminum flat products processing facilities.

- **Aluminum Profile and Composite Panel Production Facility:** Open Area: 270,000 m², Closed Area: 130,000 m²
- **PVC Profile and Shutter Production Facility:** Open Area: 60,000 m², Closed Area: 35,000 m²
- **ASAŞ Aluminum Flat Product Production Facility:** Open Area: 310,000 m², Closed Area: 135,000 m²

ASAŞ currently employs 2,931 people. Additionally, recruitment activities continue to address increasing production demand. The existing facilities offer employees cafeterias, a dining hall, restrooms, dressing rooms, recreation/game rooms, and a fitness center.

Summary information about ASAŞ employees is given in Table 2-1 below:

Table 2-1 Number of-Employees and Gender Distribution (2025)

	Male	Woman	Grand Total
White collar	428	196	624
Blue Collar	2233	74	2307
Grand Total	2661	270	2931

ASAŞ offers a number of fringe and social benefits to its employees. Over the years, ASAŞ has pursued a policy of increasing and diversifying fringe benefits, a key factor in boosting employee motivation. ASAŞ's current fringe and social benefit coverage is outlined Table 2-2.

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Table 2-2 ASAŞ's Current Benefit and Social Benefit Scope

Fringe and Social Benefits Table	Scope
Fringe Benefits (Market-Clothing)	All Employees
Ramadan Market Aid	All Employees
Fuel Aid	All Employees
Educational Assistance	All Employees
Death Benefit	All Employees
Birth Assistance	All Employees
Marriage Assistance	All Employees
Monthly Roadside Assistance	All Employees
Child Support	All Employees
Germany Work Premium	Employees going to Germany
Private Health and Life Insurance	All Employees
Seniority Incentive Bonus	Hourly Blue Collar Workers

ASAŞ is seeking to improve the facility's environmental and social performance and is requesting supporting documentation. This Stakeholder Engagement Plan has been prepared in accordance with IFC Performance Standards. The goal is to ensure effective and inclusive consultations and maintain a productive stakeholder engagement process throughout the facility's operational lifecycle.

3 ASAŞ CAMPUS

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

- Aluminum Profile and Composite Panel Production Facility, PVC Profile and Shutter Production Facility: Kışla Alani Street No: 2-2/1, 54400 Akyazı - Sakarya / Turkey
- ASAŞ Aluminum Flat Product Production 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 Sanayi ve Ticaret A.Ş. Land acquisition began in March 2018 and was completed in August 2020.

ASAŞ operates across the production areas mentioned above. Figure 3-1 shows the location of the Facility.

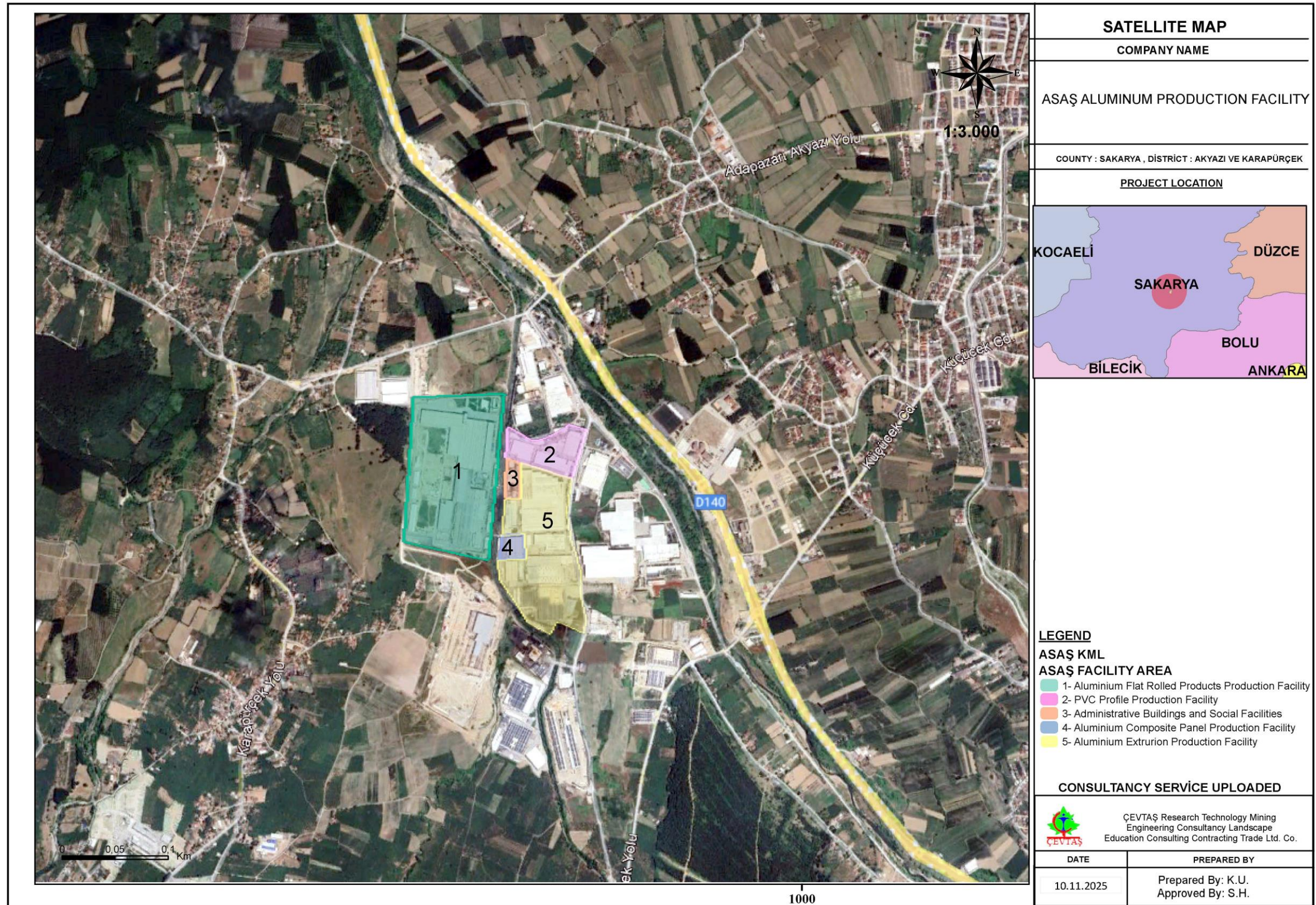


Figure 3-1 Project Location

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4 LEGISLATIVE REQUIREMENTS

This section outlines how ASAŞ will organize its stakeholder engagement activities within the scope of national and international requirements.

4.1 Turkish Legislation

Constitution of the Republic of Turkey

The main document of the national legal framework is the "Constitution of the Republic of Turkey," which includes articles related to the project's human and labor rights, social peace, and stakeholder participation. These articles are as follows:

I. Equality Before the Law

ARTICLE 10. Everyone is equal before the law, regardless of language, race, color, gender, political opinion, philosophical belief, religion, or similar grounds. Women and men have equal rights, and these rights are a state obligation and are implemented in practice. Measures taken for this purpose cannot be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

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

III. Freedom of Thought and Ideas

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one may be forced to express their thoughts and opinions, for any reason or purpose, and cannot be condemned or accused for their opinions.

IV. Freedom of Expression and Dissemination of Thought

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

V. Right to Petition

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

Access to Information Law

Everyone has the right to provide information about the activities of public institutions, organizations, and professional organizations. The procedures and principles for obtaining information, based on the principles of transparency, equality, and impartiality, are regulated in Law No. 4982 on Access to Information (Official Gazette No. 25269, dated October 24, 2003).

Law on the Exercise of the Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the competent authorities regarding his/her requests and complaints about himself/herself or the public,

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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 views, philosophical beliefs, religion, sexuality, or similar grounds is prohibited in the employment relationship. Except for biological reasons or reasons related to the nature of the work, the employer shall not take any direct or indirect action against the employee based on gender or the employee's maternity status in the establishment, terms, performance, and termination of the employment contract. Differential remuneration for similar work or work of equal value is not permitted.

The Employee's Right to Immediate Termination Based on 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 provided by law, the employment contract is not subject to any special form.

Shift

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

ARTICLE 42. All or some workers may be required to work overtime only in cases of actual or threatened malfunction, urgent work on machinery, tools, or equipment, or force majeure. Compulsory overtime cannot exceed the time required to ensure the normal operation of the workplace.

Working Age and Child Labor Ban

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children over the age of fourteen and who have completed primary education may be employed in light work that does not hinder their physical, mental, and spiritual development.

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

There are four types of collective agreements: workplace collective agreement, enterprise collective agreement, group collective agreement and framework agreement.

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 the enjoyment of legally recognized rights and freedoms. Within the scope of this Law, 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.

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

ARTICLE 12 - (1) 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,

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 develop the environment, which is the common asset of all citizens; to better use and preserve land and natural resources in rural and urban areas; to prevent water, soil and air pollution; to regulate all kinds of regulations and measures to improve and secure the health, civilization and living conditions of present and future generations, based on specific legal and technical principles, in accordance with the objectives of economic and social development, by protecting the country's plant and animal assets and its 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 Table 4-1. The obligation to prepare a Stakeholder Participation 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.

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Table 4-1 Specific Objectives of the Turkish National EIA Regulation (EIA Regulation, Article 9)

<i>Meeting on public information and participation in the process</i> 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> (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> (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> (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> (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>

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4.2 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

4.3 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.

5 DUTIES AND RESPONSIBILITIES

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 5-1. The Stakeholder Engagement Plan organizational chart is in Annex 7, and the responsible parties Table 5-2

Table 5-1 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 Determine the resources required for the effective implementation of the Stakeholder Engagement Plan and present them to department managers. Evaluation of the compliance of facility activities with national and international legislation Developing and publicizing Complaint Management procedures Collecting complaints from local people, the public, non-governmental organizations and related groups as a contact person Forwarding incoming complaints to relevant parties Receiving, examining, investigating and following up on complaints

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Duty	Responsibilities
	Directing incoming complaints to relevant units for resolution Implementation, monitoring and evaluation of the regulations within the scope of the complaints procedure Regular review of the Grievance Mechanism as a result of changes in employment legislation and lessons learned from the operation of the Facilities Communicating the Grievance Mechanism to all subcontractor employees through communication channels Ensuring that the Grievance Mechanism is a featured topic during new employee orientation Providing confidential advice to workers when employees are reluctant to meet with supervisors or subcontractor management to resolve issues they are experiencing. Providing advice and support to Subcontractor supervisors and managers on their duties and responsibilities for the successful implementation and operation of the Grievance Mechanism Reporting Progress Reports to external stakeholders to maintain effective stakeholder engagement Implementation of Good Industry Practices Continuing interaction with stakeholders by implementing social investment projects to avoid negative social impacts and create positive public perception about ASAŞ

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Table 5-2 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 ASAŞ	:	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)

6 FACILITY STAKEHOLDERS

The purpose of stakeholder identification is to determine which stakeholders may be directly or indirectly – positively or negatively – affected (affected parties) or have an interest in the Facilities (interested parties).

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

External stakeholders may include individuals from locally affected communities, their formal or informal representatives, and opinion leaders. They may participate as representatives in public consultations. Additionally, suppliers, subcontractors, customers, local governments, government agencies, vocational schools, OIZ management, non-governmental organizations, academic communities, and neighboring facilities must also be designated as stakeholders of the facilities. ASAŞ will be obligated to publicize all activities concerning its stakeholders throughout the facility's lifespan. As part of its human rights principles, it will respond to external complaints, suggestions, and requests for information.

Internal stakeholders include workers at all levels working at the facility. ASAŞ has certain responsibilities towards all its employees. These responsibilities begin with the incomplete implementation of Turkish legislation. Furthermore, it develops its behaviors, as outlined in PS-2, to treat all employees fairly, ensure sustainable improvement in employee-management relations, protect vulnerable groups such as child labor and migrant workers, create safe and healthy working conditions, and avoid forced labor. It will also demand and ensure the monitoring of these principles, which include human and labor rights, from the companies it works with.

ASAŞ will establish a mechanism to facilitate the participation of all stakeholders and will use all available communication channels to communicate this. However, it is still not possible to reach all stakeholders equally. Reaching out to individuals belonging to vulnerable groups is crucial in this regard. ASAŞ will conduct screenings for both internal and external stakeholders. Kerim Salim, External Stakeholder Communications Officer, will be responsible for this screening. This is because individuals from vulnerable groups are more likely to be harmed by the potential negative impacts of the facility. These individuals will be contacted directly during stakeholder engagement meetings and in any activities related to the facility that may have a potential impact on the public.

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

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- Refugees,
- Indigenous minority groups,
- Those over 70 years of age who live alone,
- Physically or mentally disabled people,
- Those who have chronic diseases or are bedridden,
- Female heads of households,
- Poor people who live on state or association aid,
- People who are economically dependent on unique natural resources,
- Peasants who do not own land and work on other people's land on a daily basis.

It is important to recognize that disadvantaged and vulnerable groups affected by facility activities may have difficulty engaging in the stakeholder engagement process, and special efforts should be made to address this. When defining a stakeholder, the Stakeholder Engagement Plan considers that this individual or group may be directly or indirectly affected by the facility. In addition, other individuals and groups with an interest in or impact on the facilities are also included in the plan.

The stakeholder identification process continues throughout the Facility's lifespan. It must be regularly reviewed and updated. Because stakeholder identification is an ongoing process, different stakeholders engage in different areas. Therefore, stakeholders can be categorized based on their connection to the Facility. Understanding a stakeholder group's connection to the Facility helps identify the key objectives of stakeholder engagement. Table 6-1 lists the stakeholders interested and affected by the project.

Table 6-1 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
Local People		
- Local preschools, elementary schools, middle schools, and high schools - Yazılıgürgen and Küçükçek İstiklal Village Headman and Neighborhood Residents - Neighboring facilities in Sakarya Küçükçek Organized Industrial Zone	√	√
ASAŞ Employees		
- Partners (Shareholders) - Senior Management - Facility Employees	√	√
Public Administration Units		
- 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 Governorship - Sakarya Governorship - Sakarya Provincial Directorate of Environment, Urbanization and Climate Change - Sakarya Provincial Health Directorate - Sakarya Chamber of Commerce and Industry	√	√

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Stakeholder Groups	Stakeholder Type	
	Affected	Interested
- Akyazı and Karapürçek District Health Directorate - Ministry of Industry and Technology - Turkish Employment Agency (İŞKUR) - Organized Industrial Zones Supreme Organization (OSBÜK)		
Educational Units		
- Sakarya University - Sakarya University of Applied Sciences - Vocational High Schools in Akyazı and Karapürçek Districts	√	√
Municipalities		
- Akyazı Municipality - Karapürçek Municipality - Sakarya Metropolitan Municipality	√	√
Mukhtars' Offices		
Yazılıgürgen and Küçükcek İstiklal Neighborhoods	√	√
Raw Material and Service Providers in the Supply Chain, Buyers in the Market and Other Projects / Facilities / Companies / Customers that Produce and/or Sell in Similar Sectors	√	√
Non-Governmental Organizations (NGOs)	√	√
Associations and Memberships*		
- Aluminum Stewardship Initiative - Sustainable Development Association Turkey - Cepheder (Front Industrialists and Business People Association) - ECOVADIS - Saha Istanbul (Defense, Aviation and Space Cluster Association) - UN GLOBAL	√	√
Standard Setting Institutions (International Standard of Organization, TSE, DIN, RAL etc.)	√	√
Banks	√	√
Insurances	√	√
Chambers of Industry and Commerce	√	√
Customs Consultancies	√	√
Disadvantaged, Sensitive and Vulnerable Groups	√	-

Source: ASAŞ GN-LS1015 Related Parties Document

* Associations with active membership have been selected in the ASAŞ KIM-LS01_0 Association Membership List document.

7 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 prospects in local communities. However, this prospect is not always met; qualified positions are given to external workers, while locals are often forced into low-paying, short-term jobs. This can exacerbate social inequalities and foster community dissatisfaction. Furthermore, lack of worker protection, long shifts, inadequate housing, or obstruction of unionization rights can create tensions in employer-employee relations.

Land acquisition and the impact on livelihoods are another critical aspect of the project. If the area allocated for the facility is agricultural or forested, the livelihoods of local people are directly harmed. Inadequate or delayed compensation has serious negative consequences, particularly for vulnerable groups such as women, the poor, and the elderly. Restricting communities' access to agricultural production and natural resources can reduce living standards and undermine social cohesion.

The facility's operations are increasing the influx of external labor into the region. This has the potential to put pressure on housing, healthcare, infrastructure, and social cohesion. The influx of labor could lead to consequences such as higher rents, social tensions, gender-based violence, and 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 can lead to human rights violations if miscommunication or disproportionate use of force occurs.

Facility operations are considered risks to cultural heritage and community identity. Damage to logistics routes or the facility itself to sacred sites, cemeteries, or areas of high symbolic value to the community can have lasting impacts on community identity. Furthermore, new demographic and economic changes in the region can weaken traditional social structures and create cultural erosion.

From a vulnerable perspective, women and youth are often employed in low-wage jobs and are disproportionately affected by the loss of their 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 consultations and may be disproportionately affected by facility activities.

Finally, the effectiveness of stakeholder engagement and grievance mechanisms plays a decisive role in the social acceptance of facilities. Lack of transparency in communication processes can foster distrust, while inadequate or inaccessible grievance mechanisms can lead communities to express their concerns informally. Therefore, the success of stakeholder engagement depends not only on technical capacity but also on the implementation of an inclusive, ongoing, and trust-based stakeholder engagement process.

The mitigation table for managing the potential impacts mentioned above is presented below .

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Table 7-1 Mitigation to Manage 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 Plan (SE/APP).
Inadequacy of the complaint 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)

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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).

8 STAKEHOLDER ENGAGEMENT TOOLS

The project has used and will continue to use a range of tools and methods for stakeholder engagement. The project will incorporate existing communication mechanisms, as well as new mechanisms as appropriate, to ensure efficient and effective stakeholder engagement throughout its lifespan.

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 will include stakeholder meetings planned by the Project or requested by stakeholders.
- ASAŞ website – public project announcements, documents, reports, etc.
- Grievance mechanism – specifically targeted at directly impacted stakeholders. Details of this mechanism have been and will continue to be made available to stakeholders in the impact area.
- Media promotions – sharing information with newspapers, magazines, sectoral publications, etc.
- Social media channels – LinkedIn , Instagram, X, YouTube , Hayat ASAŞ platform.
- Meetings and discussions – meetings held at regular intervals or spontaneously on-site.
- Organizing ASAŞ Academy activities, field events and fairs.

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9 STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement will continue throughout the life of the Facilities. Key stakeholders will be kept informed of the Facilities' activities. They will have the opportunity to provide feedback on the effectiveness of remediation and improvement measures and to raise any issues or complaints.

Information to be shared through the implementation of this Report will include:

- Impacts identified to occur within the scope of the project
- Project impacts and compensation or recovery methods implemented
- 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 and delivered 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 consideration when communicating with affected stakeholders and other interested parties.

Those responsible for the Facility's Stakeholder Engagement Plan will be responsible for engaging with stakeholders as an ongoing process throughout the Facility's lifespan. Complaints can be an indicator of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and addressing complaints will support the development of positive relationships between the Facility and its stakeholders.

ASAŞ has formally established an internal Complaint/Suggestion Mechanism. This will provide a formal and ongoing avenue for stakeholders to interact with the Facility. With the implementation of this plan, this formal complaint mechanism, established free of charge for internal and external stakeholders, will not preclude access to other judicial or administrative remedies.

With the implementation of the Stakeholder Engagement Plan, internal and external stakeholders will be able to share their ideas and complaints through a variety of options, including ASAŞ's website, QR code , request-complaint-suggestion box, mail, and in-person meetings. The Stakeholder Engagement Monitoring Program Table 9-1

Table 9-1 Stakeholder Engagement Monitoring Program

Stakeholder Groups	Scope	Frequency	Methods and Tools
Local People - Local preschools, elementary schools, middle schools, and high schools - Yazılıgürgen and Küçükçek İstiklal Village Headman and Neighborhood Residents - Sakarya Küçükçek Organized Industrial Zone	- Recruitment Process - Social Responsibility Projects - Update of Facility activities and progress upon request - Organizing explanatory meetings regarding public complaints, demands and feedback - Monitoring public safety and security through effective and applicable stakeholder engagement	6 Months/Yearly In Case of Need	Printed brochures and posters Website Official social media accounts Information, Telephone Calls, Complaint Mechanism
ASAŞ Employees - Partners (Shareholders) - Senior Management - Facility Employees	Monthly control of Complaint Mechanism applications in the facility area	Continually	Email to all employees Virtual meetings Teleconference ASAŞ's websites Written updates Notice boards In-depth interviews Focus group meetings
Public Administration Units - 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 Governorship - Sakarya Governorship - Sakarya Provincial Directorate of Environment, Urbanization and Climate Change - Sakarya Provincial Health Directorate - Sakarya Chamber of Commerce and Industry	- Update of Facility activities and progress upon request - Organizing explanatory meetings regarding public complaints, demands and feedback - Local purchasing and employment data.	Annual In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism



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•Akyazı and Karapürçek District Health Directorate •Ministry of Industry and Technology •Turkish Employment Agency •Organized Industrial Zones Supreme Organization			
Educational Units • Sakarya University • Sakarya University of Applied Sciences • Vocational High Schools in Akyazı and Karapürçek Districts	•Update of Facility activities and progress upon request		Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism University days Open door events
Municipalities •Sakarya Metropolitan Municipality •Akyazı and Karapürçek Municipalities	•Update of Facility activities and progress upon request •Organizing explanatory meetings regarding public complaints, demands and feedback •Local purchasing and employment data.	6 Months/Yearly In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism
Mukhtars' Offices •Yazılıgürgen and Küçükcek İstiklal Neighborhoods	•Organizing explanatory meetings regarding public complaints, demands and feedback	6 Months/Yearly In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism
/ Customers that Produce and/or Sell in Similar Sectors	•Update of Facility activities and progress upon request •Local purchasing and employment data •Impact of changes in the project •Changes regarding facility/company employee rights	6 Months/Yearly In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information



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	•Information about working hours and shift system •Information on the prevention of forced and child labor •Information about harassment and discrimination in the workplace •Information about gender-based discrimination and harassment in the workplace		Phone Calls Complaint Mechanism
Civil Society Organizations (NGO)	•Update of Facility activities and progress upon request	In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism
Associations and Memberships •Aluminium Stewardship Initiative •Sustainable Development Association Turkey •Cepheder (Front Industrialists and Business People Association) •ECOVADIS •Saha Istanbul (Defense, Aviation and Space Cluster Association) •UN GLOBAL	•Update of Facility activities and progress upon request	In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism
Standard Setting Institutions (International Standard of Organization, TSE, DIN, RAL etc.) , Ministry of Finance, Insurance, Chambers of Industry and Commerce, Customs Consultancies	•Update of Facility activities and progress upon request	In Case of Need	Teleconference Virtual meetings Printed brochures and posters Website Information Phone Calls Complaint Mechanism
Disadvantaged, Sensitive and Vulnerable Groups •Low-income individuals and families	•Update of Facility activities and progress upon request	6 Months/Yearly In Case of Need	Website Information Phone Calls

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•Men and women with low education level and/or illiteracy •Men and women with physical and/or mental disabilities •Men and women in older age groups •Women who are single heads of households •Minorities, asylum seekers and refugees		Complaint Mechanism Special meetings and consultations for disadvantaged groups Printed and written documents must be comprehensive, meaningful and clear.
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Source: ASAŞ GN-LS1015 Related Parties Document

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The grievance procedure will be managed by the Grievance Mechanism Officer, Zeynep TÜRKYILMAZ TÜRK (Senior Employee Relations Specialist), who is the primary interface between the local community and ASAŞ . Confidentiality procedures will be implemented to appropriately protect the complainant.

Information about ASAŞ's complaints mechanism is included in Section 12 of this document.

9.1 Stakeholder Engagement Activities Conducted

ASAŞ launched its first activity within the scope of the Stakeholder Engagement Plan in 2020 and updated it in 2022. Face-to-face interviews and meetings were held by the relevant Consulting Firm and the relevant Social Expert in the Stakeholder Engagement Plan processes previously carried out in 2020 and 2022 within the scope of the project (See ASAŞ website - public project announcements).

All ASAŞ facilities are located within the borders of Yazılıgürge Village. ASAŞ has completed the land acquisition process within the borders of Yazılıgürge Village. A total of 265,7109 m² of agricultural land was purchased from 124 different landowners across 52 parcels in Yazılıgürge Village. ASAŞ took particular care to avoid damaging any structures during the construction phase. Currently, there is no land acquisition or new construction.

Additionally, corporate social responsibility projects within the scope of stakeholder engagement are explained in Chapter 10.

ÇEVTAŞ held a meeting with its Energy and Sustainability Director and task force on July 31, 2025, to gather information to update the existing SEP. Subsequently, meetings were held with the Marketing and Corporate Communications Group Manager and Senior Specialists, the Administrative Affairs Manager, the Payroll and Personnel Affairs Manager, the Employee Relations Senior Specialist, the Internal Audit and Corporate Development Director, the Human Resources Group Manager, the OHS and Environment Manager, the HR Director, and the General Manager of Organization to discuss the planned activities within the scope of ASAŞ's existing SEP and the management of environmental and social risks and impacts.



Photo 9-1 Meeting on the Basis for the Update of the SEP (ASAŞ and ÇEVTAŞ 31.07.2025)

9.2 Participation Activities

ASAŞ invites its stakeholders to actively participate in making this SEP an interactive and dynamic document. Currently, personnel involved in the SEP are being trained to provide the knowledge and skills necessary to manage environmental and social impacts, and assessments are being conducted to ensure effective SEP management.

Stakeholder engagement is an inclusive process throughout the project lifecycle, supporting the establishment of strong, constructive, and responsive working relationships crucial for successfully managing the project's environmental and social impacts and risks. Stakeholder Engagement Meetings facilitate early, frequent, and open communication throughout the project lifecycle, helping to manage stakeholder expectations that will impact risk, potential disagreements, and project delays.

Stakeholder consultation meetings have been held to provide information to relevant experts on the technical, social, and environmental details of the current project, to answer any questions participants may have about the project, and to gather their opinions. A stakeholder participation meeting will be held on-site. The meeting will be held after ÇEVTAŞ approves and publishes the draft version of this revised SEP.

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Table 9-2 Stakeholder Consultation Meetings (2025)

Stakeholder	Meeting Date/Time	Photos
Sakarya Provincial Directorate of Environment, Urbanization and Climate Change, EIA Branch Manager	September 16, 2025 / 2:00 PM	No photographs were taken during the interview.
Sakarya Metropolitan Municipality Environmental Protection and Control Directorate	September 16, 2025 / 4:00 PM	No photographs were taken during the interview.
Akyazı Municipality	September 17, 2025 / 10:00	
Küçükcek Neighborhood Headman	September 17, 2025 / 1:00 PM	
Yazılıgürgen Neighborhood Headman	September 17, 2025 / 2:00 PM	No photographs were taken during the interview.
Harmanlı Neighborhood Headman	September 17, 2025 / 3:00 PM	No photographs were taken during the interview.

Local People of
Yazılıgürgen and
Kızılbayır
Neighborhood

September 18, 2025 /
10:00



ASAS

September 18, 2025 /
2:00 PM



10 CORPORATE SOCIAL RESPONSIBILITY PROJECTS

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

- **ASAŞ Basketball Club**

Athletes are trained at the basketball school, which was established with the belief that making positive impacts on the lives of children in the region where it operates through sports and education is the best human resources investment for the future.

It is aimed to raise children to be more successful individuals in life through socialization, avoiding bad habits, discipline and a healthy life that the love of sports will provide.

ASAŞ Basketball Club participates with a total of 7 teams, including U10-U11-U12-U14-U16 teams and girls' U16-U18 teams.



Photo 10-1 ASAŞ Basketball Club Activities-(Men)

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



Photo 10-2 ASAŞ Basketball Club Activities-(Girls)

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

- **Golden Ball for Every Home**

The "Golden Ball for Every Home" project covers the in vitro fertilization costs of ASAŞ employees who want to experience the joy of becoming parents each year. To date, numerous prospective parents have been supported.



Figure 10-1Golden Ball Project Poster for Each Home

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

- **TEMA Foundation Seedling Donation**

Saplings are donated to the TEMA Foundation on behalf of newly hired white-collar workers. Certificates for the donated saplings are also included in the welcome kits given to newly hired employees.

- **Environment Day Events**

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

Küçükçek Stream, which flows through our factory campus, contributing to the improvement of the stream bed. We also cleaned up solid waste from the roads surrounding ASAŞ, contributing to the environment.



Photo 10-3 Environment Day Events

- **ASAŞ ART**

ASAŞSANAT to expand its support for the arts and bring them together under one roof. This effort brings together artists, academics, and students to foster mutual synergy in learning, design, and production . By organizing courses and seminars for the spouses and children of all ASAŞ employees, ASAŞSANAT aims to support the transformation art creates in society and the development of the ability to gain diverse perspectives.



Figure 10-2 Art Project

- **Bicycle-Friendly Employer Practices**

As part of its sustainability efforts, ASAŞ has achieved the CFE-approved Gold Level Bicycle-Friendly Employer Certificate by promoting the use of bicycles, an environmentally friendly means of transportation, to reduce its carbon footprint. ASAŞ is the second Turkish employer to receive this certification. In addition to providing 320 bicycles for employee use and ample parking spaces throughout the campus, an 8 km bike path has been constructed on campus, facilitating transportation between the factory's production facilities. ASAŞ is also working to support employees who want to cycle to work by connecting bicycle transportation to the Akyazı district through the project and liaising with relevant institutions.



Photo 10-4 Bicycle-Friendly Employer Practices

- **Energy Savings Week Events**

In line with its principle of efficient and sustainable operation, ASAŞ established Energy Committees to analyze the energy performance of all its processes and develop projects that will use its resources more efficiently. As part of Energy Savings Week events from January 11-18, a quiz on Energy Savings was held throughout the factory on an online platform accessible by participants via their phones.



Photo 10-5 Energy Savings Week Events

- **Science and Technology Week Events**

As part of Science and Technology Week, March 10-12, ASAŞ visited Akyazı Altındere Mehmet Akif Primary School and provided training. Interactive experiments were also included in the training.



Photo 10-6 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 sapling planting event of the Sakarya General Directorate of Forestry in Kaynarca, as part of the March 21 Forest Week.



Photo 10-7 Forest Week Activities

- **World Water Day Events**

ASAŞ carried out an awareness and information campaign within the factory to remind the value of water.

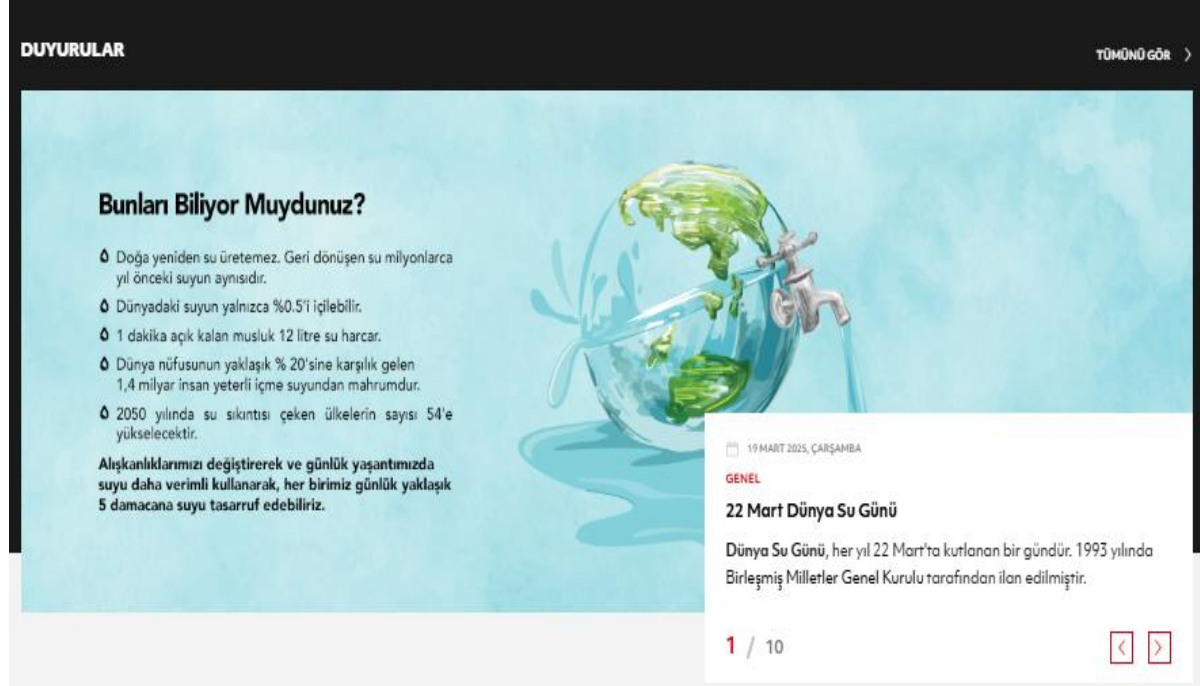


Figure 10-3World Water Day Announcement Image

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 Stray Animals Day Events**

A special awareness campaign was conducted at the factory to raise awareness about the living conditions of stray animals worldwide. Additionally, ASAŞ's planned corporate social responsibility projects include the "Habitat for Stray Animals" project.

Corporate Social Responsibility Projects Planned to be Implemented:

- **Stray Animals Habitat**

In the Akyazı district, and particularly in the factory area, there are plans to create habitats for stray animals, which have become a significant problem for local residents in recent years. The goal is to both ensure the comfort of local residents and create a natural habitat for stray animals. As part of these efforts, a location has been identified within the factory site. A verbal agreement has been reached with the Akyazı Municipality to undertake a joint project on this issue, which was also raised at the Stakeholder Participation Meeting.

Initially planned to accommodate 50 kennels and 100 dogs, the living area, unlike animal shelters, will not be fenced off, creating a natural habitat for stray animals. Organic food waste will be used to feed

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the animals, and their population will be controlled through sterilization and neutering efforts. Project information will be updated once the project is implemented.

- **Energy and Environment Seminars**

ASAŞ creates value in its region and provides employment for thousands. It prioritizes developing its region and supporting solutions to local problems. Due to its area of operation, it has significant experience in the efficient use of energy. It intends to share this experience by conducting seminars on energy and the environment in schools, adhering to the principle of "bend the tree while it's young."

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11 COMPLAINT MECHANISM

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

A Grievance Mechanism (GM) is a mechanism that provides stakeholders with channels to provide feedback and raise complaints about project activities and to identify and resolve issues affecting the project. By increasing transparency and accountability, the GM aims to reduce the risk of project impact on citizens/beneficiaries and acts as an important feedback and learning mechanism to improve project impact.

The SM will be accessible to a wide range of project stakeholders who are likely to be directly or indirectly affected by the project.

The first acceptance of complaints is made by the Complaint Mechanism Officer Zeynep TÜRKYILMAZ TÜRK. The Complaint Mechanism Officer will be responsible for classifying complaints under specific headings and forwarding them to the relevant party based on the subject of the complaint. Detailed information about the Complaint Record is provided in Section 10.2.

The length of time it takes to respond to or review a complaint will depend largely on the complexity of the complaint. Ideally, a resolution should be achieved within 14 calendar days of receiving the complaint.

The methods used to disseminate the Grievance Mechanism must be culturally appropriate and consistent with stakeholders' general methods of information dissemination. For example, vulnerable groups and other stakeholders may access information differently, and equal access to information must be ensured for both groups. Stakeholders will be able to share their views and complaints throughout the Facilities' lifecycle through a range of options, including letters, emails, complaint boxes, and face-to-face meetings.

All stakeholders who submit a complaint may request that their application be handled confidentially. Respondents will ensure that the complainant's name and contact information are not disclosed without their consent.

11.1 Complaint Mechanism Communication Channels

Channels for forwarding complaints and suggestions to ASAŞ are given below.

Table 11-1 Complaint Mechanism Communication Channels

Phone : 0 216 680 07 80
E-mail : info@asastr.com
Feedback form : https://www.talepkutusu.com/ , For posters placed on buildings, please see Annex-3.
Suggestion and Complaint Boxes: Suggestion and complaint boxes placed in buildings
Complaint Mechanism Officer: Zeynep TÜRKYILMAZ TÜRK (Employee Relations Senior Specialist)

In addition to the grievance mechanisms at different levels described above, throughout the Project lifecycle stakeholders will also be able to use the national Grievance Mechanism channels detailed below.

The channels for conveying complaints and suggestions to the Administration, primarily through the national complaint mechanism such as the Presidency of the Republic of Turkey Communication Center and the Foreigners Communication Center are given below:

Presidential Communication Center Communication Channel: Presidential Communication Center provides a centralized complaint system for Turkish citizens, legal entities, and foreigners. Presidential Communication Center will be offered to Project stakeholders as an alternative and well-known channel to convey their Project-related complaints and feedback directly to government officials.

Table 11-2 Presidential Communication Center Communication Channels

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

Foreigners Communication Center Communication Channel: Foreigners Communication Center will be offered to the foreign national stakeholders of the Project as an alternative and well-known channel to convey their complaints and feedback regarding the Project directly to the government authorities.

Table 11-3 Foreigners Communication Center Communication Channels

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

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These communication channels will be promoted through wall posters and project brochures throughout all buildings. Furthermore, all project employees will be responsible for informing stakeholders about the suggestion and complaint mechanisms. All employees will be briefed on this matter prior to the project.

Employee Grievance Mechanism: A list of current contact points is provided in employee handbooks and / or on bulletin boards . All grievance mechanism processes are communicated in a language employees can understand . The grievance mechanism is a training topic in orientation training . When a dispute arises regarding employee rights , the grievance is lodged through the grievance mechanism or through an " Employee Representative , " who is a full - time employee elected by employees and a permanent employee of the workplace . When employees detect any precautions , hazards , or risks that have not been taken in terms of occupational health and safety , they notify the employee representative , occupational safety specialist , and / or occupational physician (appointed by the employer) . The employee representative forwards the details of this hazard and risk to the Occupational Health and Safety Board and requests its evaluation .

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

11.2 Complaint Record

All incoming complaints will be recorded in the Complaint Log by assigning a reference number.

The Complaint Log will also be used to monitor the status of the complaint, determine the frequency of complaint occurrence, analyze the reasons for the complaint, and identify common complaint topics and recurring trends.

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

- Complaint reference number
- Date of complaint
- Where the complaint was received and in what format (for complaint boxes)
- Contact information of the complainant (in case of non-anonymous complaints)
- Content of the complaint
- Parties responsible for handling the matter
- Dates on which the investigation of complaints began and ended
- Results of the investigation
- Information on the proposed corrective actions to be sent to the complainant (if not anonymous) and the date of sending
- Completion date for actions required by facilities personnel

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- Information on whether the corrective action was satisfactory or whether there was a reason why the complaint was not resolved
- Complaint closure
- Actions to be taken for unclosed complaint files

11.3 Duties and Responsibilities

The basic duties and responsibilities defined for carrying out effective stakeholder participation in the facility are listed in Table 5 1 of Section 5. The Stakeholder Participation Plan organization chart is in Annex-7 and the responsible parties are listed in Table 5 2 of Section 5. For the effective implementation of the Stakeholder Participation Plan, the SEP Manager and his/her subordinates;

Complaint Mechanism Officer

-Internal Complaints Officer

-External Complaints Officer

-Ethics Line Supervisor has been determined. The duties of the managers and those responsible for the complaint mechanism are listed below:

Stakeholder Engagement Manager

- Responsible for the stakeholder participation process.
- Responsible for the sustainability report.
- Manages SEP units, appoints new officers or dismisses them.
- Measures the success of the SEP and updates it when necessary.



Complaint Mechanism Officer

- Records all complaints from internal or external stakeholders, regardless of the channel they come from (website, phone, face to face, mailboxes, etc.).
- Directs the recorded complaints to the relevant unit.
- Explains the results about the returns from the relevant unit.
- Implements the complaint closing procedure.



Internal Complaints Officer

- Ensures that internal stakeholders know their rights and recognize the complaint mechanism.
- Manages the worker rights part of the orientation training given to internal stakeholders.
- Holds periodic meetings with internal stakeholders on worker rights.
- If any changes are made to the SEP, it conveys this to internal stakeholders.

External Complaints Officer

- Ensures that external stakeholders know their rights and recognize the complaint mechanism.
- Ensures information sharing with external stakeholders.
- Organizes external stakeholder meetings and writes texts on issues to be disclosed to the public.
- Identifies sensitive groups.
- Provides communication to resolve problems when necessary.

Ethics Line Officer

- Complaints regarding discipline or ethical principles are directed to him/her.
- Transfers the complaint to the relevant board.
- Ensures that the parties are heard
- Shares the outcome of the complaint with the relevant party.
- Receives objections regarding the result.

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11.4 Complaint Procedure

Complaints should be reviewed as quickly as possible to prioritize resolution. Regardless of the overall response and resolution timeframe, certain significant complaints, such as those related to urgent security concerns or livelihoods of local communities, may require urgent intervention. The ASAŞ Complaint Handling Instructions (IK-TA-118), which form the basis of the complaint procedure, are referenced.

There are 10 steps to completing the Grievance Mechanism. This process is outlined below:

Step 1: Identification of the complaint will be done using personal communication channels based on appropriate training and information provided by the Complaint Mechanism Officer.

This complaint can be submitted through the complaint mechanism's communication channels, either in person, by phone, by letter, through complaint boxes, through complaint QR codes, or by email. The complaint mechanism communication channels are listed in Section 10.1.

Step 2: The complaint is recorded in the Complaint Log, both in writing and electronically, within one day of receipt. The complaint log will be managed by the designated Complaint 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: a complaint that is isolated or "one-off" (within a specific reporting period - one year) and primarily local in nature.

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

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

Level 3 Complaint: A one-off complaint or widespread and/or repeated complaints; also complaints resulting in serious breaches of the Facilities' Policies or national legislation, complaints resulting in negative national/international media attention, complaints perceived to have generated negative comment from the media or other key stakeholders (e.g. inadequate waste management).

Where a complaint is considered outside the scope of the Complaint Mechanism, the complaint should be notified to the other party via the preferred method of communication and an alternative resolution should be suggested.

Step 3: Complaints are acknowledged in person or by phone, through complaint boxes, or by mail. The complaint process is expected to be completed within 14 business days of submission (except for Level 3 complaints, which require immediate attention). If the complaint is unclear or additional information is required, clarification will be sought from the complainant at this step.

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Step 4: The level of the complaint is determined by the Grievance Mechanism Officer. All Level 3 complaints are reported to the Facility Manager. ASAŞ senior management supports the Grievance Mechanism Officer in determining who should handle the complaint on a case-by-case basis and consults with them on any additional support needed during the complaint closure process.

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

Step 6: The authorized team will complete the complaint response 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 must include an appropriate resolution, either taking measures to resolve the issue or providing financial compensation for damages incurred during the Facility Operations.

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

Step 8: Communications regarding the response to the complaint must be carefully coordinated. The Grievance Mechanism Officer ensures that an appropriate approach to communicating the response is agreed upon and implemented.

Step 9: The complainant's response is recorded to help assess whether the complaint has been closed correctly or whether further action is required. The Grievance Mechanism Officer uses appropriate communication channels, including a telephone or in-person meeting, to confirm that the complainant has understood and is satisfied with the response.

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

If possible, the complainant's response should be recorded in the Complaint Log, together with notes on redress methods to prevent the complaint from recurring in the future.

If the Grievance Mechanism Officer or other department managers deem a complaint submitted through the grievance mechanism to be outside their area of responsibility, the Grievance Mechanism Officer will provide a detailed explanation/justification for the situation. If the complainant is unsatisfied with the response, further explanation will be provided on how the complainant can proceed with the complaint process.

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Step 10: The complaint is closed with a signature from the Complaint Mechanism Officer. The Complaint Mechanism Officer determines whether a complaint can be closed or requires further review. If further review is required, the Complaint Mechanism Officer must return to Step 2 to reconsider the complaint. After assessing whether the complaint can be closed, the Complaint Mechanism Officer approves the closure. For Level 3 complaints, the Complaint Mechanism Officer will request signatures from the relevant departments to reach an agreement for closure. This agreement can be a signature or an email explaining the agreement. The Complaint Mechanism Officer completes the necessary filings and records the data in the Complaint Log.

Complaint Handling Procedure (PR.KY.10) is used to handle complaints arising from dealer and customer activities, including receiving, tracking, acknowledging receipt, initial evaluation, investigation of the product in question, and subsequent closure of the complaint. There are six steps in the customer complaint handling procedure. This process is described below:

Step 1: Receiving Complaints / Contact: Customers (Dealers) can contact the Sales Directorate, Quality Department, and Technical Departments with their complaints and requests. Customer complaints, including label or inkjet information, can be submitted to team members in the Sales Directorate, Quality Department, and Technical Departments via phone, fax, email, or webmail.

Step 2: Notification of Receipt of Complaint: The unit responsible for customer complaints informs you verbally or in writing within 24 hours at the latest, stating that "we have received your complaint or it has been evaluated by the factory."

Step 3: Complaint Tracking, Initial Assessment, Investigation, and Response: Customer Complaints are recorded on the QDMS and FR.KY.35 Customer Complaint Tracking List Form (*for Response Time*). If there is missing information to identify the complaint or if a sample is required for review, the customer is contacted to complete the missing information and an External Customer Complaint is generated for the relevant unit via QDMS. By notifying the relevant production unit, an Urgent Customer Complaint Meeting is held within the scope of Instant Quality.

Step 4: Return Process After Acceptance of Complaints and Ensuring Customer Satisfaction: If the complainant (Dealer) is found to be justified in his/her complaint, the grievance in question will be resolved according to the mutual agreement to be reached with the complainant.

Step 5: Reporting and Improvement of Customer-Related Processes: Monthly reports are prepared by the Quality System and Customer Relations Specialist to periodically evaluate the distribution of complaints by month, their causes, types of errors, their resolution, and to measure improvement issues.

12 MONITORING

Project monitoring methods will be implemented throughout the Project's lifespan. The Stakeholder Engagement Plan will be reviewed annually and updated as necessary based on Project developments and unexpected public reactions. The grievance mechanism established for the Project will be effectively utilized, and a statistical summary of the grievance 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 12-1

Table 12-1Key Performance Indicators (KPIs) and Monitoring Activities – Stakeholder Participation

No	KPI	Aim	Monitoring Method
1	Number of Stakeholder Complaints	Annual increase and/or decrease data	Database
2	Number of Complaints on Similar Issues	Decrease at an annual rate	Database
3	Number of complaints responded to within the targeted one-month timeline	Target 90%	Database
4	Timeframe for Responses to Complaints	14 calendar days for non-Level 3 complaints. Quickest possible time for Level 3 complaints	Database
5	Providing feedback to stakeholders on the implementation of the Grievance Mechanism	Providing regular reports to stakeholders on the results of the Grievance Procedure	On-site Inspection Reporting
6	Internal Complaint Audit Procedure to ensure that the Grievance Mechanism is implemented and complaints are handled in accordance with the criteria	Annual audit target to close 90% of complaints within one month and to the satisfaction of the complaining party	Audit Report

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ANNEX - 1 Complaint Form (ASAŞ- Form No: IK-FR-219-2019.06-2022.01-04)

	COMPLAINT NOTIFICATION FORM	COMPLAINT NO:			
LOCATION	FLAT FACTORY ☐	PROFILE FACTORY ☐	PVC FACTORY ☐	General Directorate ☐	OTHER ☐
COMPLAINT CATEGORY					
☐ About the assets/properties affected by the facilities			☐ Infrastructure Issues		
☐ Payments (delay, discrimination, lack of information)			☐ Environmental Issues (pollution, noise, dust, etc.)		
☐ Reduction or complete loss of income sources			☐ Job Application		
☐ Damage to Property (products, buildings, land, etc.)			☐ Traffic, Transportation, Other Risks		
☐ Quality of Life (security issues, cultural conflicts)			☐ Community Health		
☐ Other (Please specify).....					
Write your complaint, stating WHAT, WHEN, WHERE, WHY and its effects. Definition of Complaint:					
Have you ever complained about the same issue?		:	  	:	 
Do you know if anyone else is having the same problem?		:	  	:	 
Please indicate if you have any requests or suggestions to resolve your complaint.					
THERE IS NO OBLIGATION TO SPECIFY NAME AND SURNAME.					
History:/...../.....					
☐ I do not want to submit my request by name. (If selected, the lower part will not be filled in.)					
Name Surname		:			

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Please tick how you would like to be contacted (phone, email).	☐ E-Mail: ☐ Personal: ☐ ☐
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THIS SECTION WILL BE FILLED OUT BY THE COMPLAINT OFFICER	
Method of Submitting the Complaint	☐ Complaint Box (specify box number)..... ☐ Other (please explain).....
Complaint Level	:
Complaint Registration Date & System Number	:/...../..... S.No :

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

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ANNEX - 2 Complaint Closure Form (Printed)

Complaint Owner	☐ External Stakeholder ☐ Employee	
Is It an Emergency?	☐ Yes ☐ 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?	☐ Yes ☐ 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?	☐ Yes ☐ No	Comment:

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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.



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ANNEX - 5 Photo of Current Suggestion Complaint Box

NOTE ON THE BOX: COMPLAINT REPORT BOX



NOTE ON THE BOX: COMPLAINT REPORT BOX

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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

