



# Yerköy-Kayseri High-Speed Railway (HSR) Project Stakeholder Engagement Plan

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## DEFINITIONS, ABBREVIATIONS & ACRONYMS

| Definition, Abbreviation or Acronym | Description  |
|-------------------------------------|--|
| ÇEKÜL                               | The Foundation for the Promotion and Protection of the Environment and Cultural Heritage |
| CLO                                 | Public Relations and Communication Officer(s)  |
| COVID-19                            | Coronavirus Disease of 2019  |
| DEIA                                | Diversity, Equity, Inclusion and Accessibility   |
| EIA                                 | Environmental Impact Assessment  |
| ESIA                                | Environmental and Social Impact Assessment   |
| ESMP                                | Environmental and Social Management Plan   |
| ESMU                                | Environmental and Social Management Unit   |
| ESS                                 | Environmental and Social Standard  |
| EU                                  | European Union   |
| FGD                                 | Focus Group Discussions  |
| GM                                  | Grievance Mechanism  |
| GRF                                 | Grievance Register Form  |
| ICP                                 | Informed Consultation and Participation  |
| IFC                                 | International Finance Corporation  |
| MoH                                 | Ministry of Health   |
| MoTI                                | Ministry of Transport and Infrastructure   |
| NGO                                 | Non-governmental Organization  |
| OHS                                 | Occupational Health and Safety   |
| PAP                                 | Project Affected People  |
| PPM                                 | Public Participation Meeting   |
| PSIA                                | Product Social Impact Assessment   |
| PSs                                 | IFC Performance Standards  |
| SEP                                 | Stakeholder Engagement Plan  |
| SMP                                 | Social Management Plan   |
| TCDD                                | General Directorate of the Republic of Türkiye State Railways                            |
| TEMA                                | The Turkish Foundation for Combating Erosion Reforestation and the                       |
| WHO                                 | World Health Organization  |
| WWF                                 | World Wide Fund for Nature   |
| SME                                 | Small and Medium Enterprises   |

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## 1. INTRODUCTION

This Stakeholder Engagement Plan (SEP) is prepared for the Yerköy-Kayseri High-Speed Railway (HSR) Project that will be constructed by Doğuş-Çelikler-Özkar Joint Venture, (“Contractor”, “JV”). Çınar Engineering and Consultancy Inc. (“Çınar”) prepared this SEP within the scope of the Environmental and Social Impact Assessment (“ESIA”) as a public document. The aim of SEP is to organise, record and formalise all engagement and consultation processes with the various stakeholders and corporate their views and concerns and addressed in them in the entire Project life.

Stakeholder engagement is the key process for building strong, inclusive, and responsive relationships necessary for the successful management of the Project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain sustainable relationship with the external stakeholders throughout the lifecycle of the Project. Starting the engagement process at an early stage helps ensure timely public access to all relevant information and allows stakeholders to engage in Project design and impact assessment.

This SEP is developed to ensure the manage the stakeholder engagement activities of the Yerköy-Kayseri High-Speed Railway (HSR) Project, in compliance with the requirements of the Turkish national law/ regulations, International Finance Corporation (IFC) Performance Standards (PSs) and Equator Principles on Social and Environmental Sustainability.

This SEP is developed to enable all processes of interaction with stakeholders who are directly or indirectly affected by the Project or who are interested in the Project results. In accordance with these requirements, this SEP identifies the Project stakeholders, target groups, vulnerable groups and the specific engagement activities required for each group, with an eye on the specific engagement and awareness building on environment, social and gender inclusion in accordance with the IFC PSs.

The SEP also includes a grievance mechanism for community members and other defined stakeholders of the Project to raise any concerns and problems related to the Project. The Grievance Mechanism Procedure (GM), which is one of the most important tools of stakeholder engagement, has also been developed within the scope of the SEP.

Stakeholder engagement is an ongoing process, and the SEP will be regularly monitored and updated throughout the phases of the Yerköy-Kayseri High-Speed Railway (HSR) Project.

### 1.1. Scope of the Project

Stakeholder Engagement Plan has been prepared to define the stakeholder groups, to determine the most appropriate and efficient method and approach for the project's characteristics and needs as a component of the Environmental and Social Management Plan and is in a structure that overlaps with other management plans, together with these plans.

The aims of the SEP are;

- Determining the national and international legal framework for SEP and GM,
- Identifying the stakeholders of the project,
- Identifying the residential areas within the impact area of the Yerköy-Kayseri High Speed Train (HSR) Project and defining the relevant stakeholder activities,
- Identification of PAPs and vulnerable persons,
- Identification of local and international non-governmental organizations,
- Determination of hospitals and emergency institutions,
- Determination of public institutions,
- Identification of other institutions, organizations and individuals,

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- Determining the policy on stakeholder engagement and the implementation of the grievance mechanism,
- Identifying activities that can be carried out with stakeholders
- Identifying stakeholders' approaches to participation in activities
- Determination of appropriate disclosure methods for stakeholders
- Determination of grievance mechanism procedure
- Keeping grievance records and determining the reporting structure

## 1.2. Objective of the Project

The SEP is developed with the aim of explaining how the Project Company will communicate with all stakeholders, including the Project Affected People (PAPs), institutions and organizations who might affect/be affected by or interested in the Project.

The main objective of the SEP is to ensure that all relevant stakeholders (individuals, groups and organizations) affected by and/or interested in the Project are engaged in project activities and information flow with these stakeholders is continuous throughout the project life. Stakeholder engagement is a key activity for such projects; because it enables stakeholders to have information at all stages of the project, to express their expectations and concerns, and to establish an open communication channel with stakeholders in the activities carried out by the investor.

The objectives of the SEP are generally as follows:

- Identification of stakeholders indirectly or directly affected by and/or interested in the project
- To ensure that all project affected groups both women and men, the old and young, vulnerable, and disadvantaged groups are included into the meaningful participation throughout the Project lifecycle in the initial stages of the Project,
- Foster strong project community relationships,
- Defining and planning stakeholder engagement activities that will commence during project preparation and planning and continue in the construction and operation stages of the project
- Determining the frequency of consultation activities, information sharing and level of participation as well as to defining the content of consultation activities
- Ensure a technically and culturally appropriate approach to engagement with all stakeholders,
- Establishment of the Grievance Mechanism, which will create an open communication channel for stakeholders at each stage of the project
- Ensuring that concerns and expectations expressed by stakeholders are addressed in the ESIA and in the decision-making and planning stages of the project.

The SEP is prepared to meet the requirements set forth in the World Bank's Operational Policies and IFC's Performance Standards, Equator Principles as well as national legislation.

## 1.3. Project Background

The construction of the high-speed train lines, are started after the 2000s, which are manufactured with a higher standard than conventional lines. Similar to the 2023 and 2035 transportation network targeted for highways, there are target networks for 2023 and 2035 for the rail system. The subject of the project has been planned by the General Directorate of the Republic of Türkiye State Railways (TCDD) Enterprise in line with these objectives.

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The Project was included in the Investment Programme of the government. The Project's tender process during this period is chronologically explained below.

- The tender for the engineering study of project, which was organized by the General Directorate of the Republic of Türkiye State Railways (TCDD) for the preparation of the 139 kilometers (86 mi) long "Yerköy - Kayseri Application High-Speed Railway Project", was made on November 21, 2014, a contract was signed with Altınok Consulting Firm, which won the tender on August 14, 2015, and on October 13, 2015 Site delivery was made in Türkiye.
- On 16th of December 2021 the tender for the turn key, design, build and finance of Yerköy-Kayseri High Standard Railway Project was held and Doguş-Çelikler-Özkar Joint Venture was awarded the contract on 24th of December 2021. The financing process is currently ongoing. Following the financial close, the construction will commence.

#### 1.4. Project Area and Vicinity

Yerköy-Şefaattli-Kayseri Railway Project is planned by TCDD General Directorate. The project will be connected to the Yerköy-Sivas (Ankara-Sivas) Railway, which is under construction, at the Yerköy Station exit. The Project will pass through Yerköy and Şefaattli Districts, of Yozgat Province, Kozaklı District of Nevşehir Province, , and then passes through Yenifakılı and Boğazlıyan Districts of Yozgat Province, , enters Kocasinan District of Kayseri Province, and ends by connecting to the Kayseri Northern Passage Railway line.

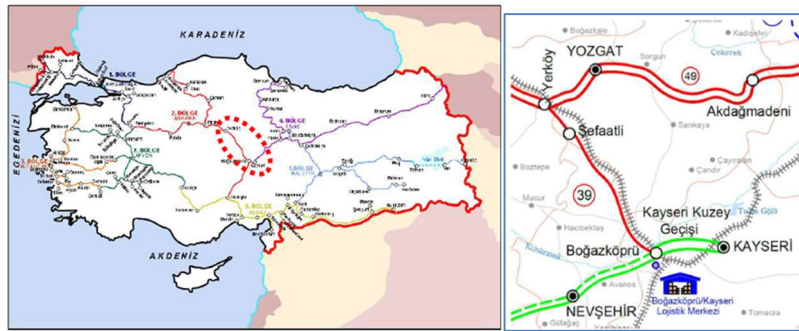
The total length of the project route is approximately 139.5 km m and in addition to the railway 6 escape tunnels are planned within the scope of the Project with a total length of 2.66 km.

The provinces and districts located on the Project route are given below:

- Yozgat Province Yerköy District (0+000 km – 20+200 km)
- Yozgat Province, Sefaattli District (20+200 km + 52+700 km)
- Nevşehir Province, Kozaklı District (52+700 km – 68+300 km)
- Yozgat Province, Yenifakılı District (68+300 km – 91+400 km)
- Yozgat Province, Boğazlıyan District (91+400 km – 94+600 km)
- Kayseri Province, Kocasinan District (94+600 km – 139+545 km)

In the light of the information given above, the Yerköy-Şefaattli-Kayseri Railway Project route;

- The 79,0 km part of the Projecy is located within the borders of Yozgat Province
- 44,945 km is located within the provincial borders of Kayseri; and
- 15.6 km long part passes through the borders of Nevşehir Province.



**Figure 1. Yerköy – Kayseri High-Speed Railway Route Line**

The settlements on the route are given below.

**Table 1 Settlements on the High-Speed Railway (HSR) Route**

| Province | Districts  |
|----------|------------|
| Yozgat   | Yerköy     |
|          | Şefaati    |
|          | Yenifakılı |
|          | Boğazlıyan |
| Nevşehir | Kozaklı    |
| Kayseri  | Kocasinan  |

### 1.5. Industrial and Commercial Areas

The transportation corridors formed by the high-speed train lines, which are being planned in an integrated manner in land transportation, will gain strategic importance in increasing human and goods flows. With the provision of railway connection with the project, the rate of road use will decrease and transportation standards will increase.

With the commissioning of the Ankara-Sivas Railway lines, which are under construction together with the Yerköy-Şefaati-Kayseri Railway Project planned in this context, a fast and reliable transportation network will be available in freight and passenger transportation on the Ankara-Yozgat-Kayseri axis. The connection of the project has been provided by Railway Projects such as Ankara-Eskişehir-Istanbul, and direct transportation of Kayseri to important centers such as Eskişehir and Istanbul will be realized. With the improving transportation standards, economic and commercial relations will be facilitated and increased both on a regional and national scale.

## 2. LEGAL FRAMEWORK

The Stakeholder Engagement Plan (SEP) aims to guide The Project Management Department on how to continuously and constructively involve stakeholders in the project management process. According to this scope, both national and international legal frameworks have a binding force.

### 2.1. National Legislation

The Turkish environmental legislation is prepared to be align the European Union (EU) Legislation due during the Türkiye's harmonization process to EU. The fundamental law for the environmental impact assessment of this Project is the Environmental Law No. 2872 (Official Gazette dated 11.08.1983 and numbered 18132). On the other hand, the Environmental Impact Assessment (EIA) principles and procedures are detailed in the Environmental Impact Assessment Regulation (last version: Official Gazette dated 29.07.2022 and numbered 31907).

### 2.2. The Constitution Of The Republic Of Türkiye

'The Constitution of the Republic of Türkiye' is the main document related to the stakeholder engagement and consultation for the Project. The key articles of the Constitution related to stakeholder engagement are listed below:

**Article 25: Freedom of Thought and Opinion** – Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

**Article 26: Freedom of Expression and Dissemination of Thought** – Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or

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collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

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

**Article 63: Conservation of Historical, Cultural and Natural Wealth** – The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

**Article 74: Right of Petition** – Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning them or the public.

#### **Civil Law No. 4721**

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

#### **Law On The Right To Information No. 4982**

The Law on the Right to Information No. 4982 (Issued 24.10.2003, Official Gazette No. 25269) states that the public has the right to receive information and complain about the progress and implementation of projects. The Act is related to the activities of public institutions and organisations as well as professional organisations with public institution status. The public have to be granted, or denied, access to the requested information or document within 15-30 working days. The Act also contains public grievance procedures in case access is denied. The right to information covers the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

#### **Law on the Use of Right To Petition No. 4982**

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the associated authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of said Law (Issued 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.

#### **Expropriation Law No. 2942**

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

#### **Regulation on Environmental Impact Assessment (Eia Regulation) No. 29186**

The Regulation entered into law in 2014, being amended in 2016, 2017 and 2019. The Regulation sets out the procedures and principles of EIA in Türkiye and the authority of the Ministry of Environment and Urban Planning to determine rule on the status of EIA projects, or delegate this decision to local authorities. The regulation also covers provision on the topics of EIA reports, EIA procedures and processes, monitoring and inspection regimes, and effective EIA and environmental management procedures.

### **2.3. International Standards**

#### **2.3.1. IFC Performance Standards**

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

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

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

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

### 2.3.2. Equator Principles

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

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

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the Eps.

Doğuş-Çelikler-Özkar Joint-Venture is committed to complying with the following Eps:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.

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

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

“To facilitate stakeholder engagement, the Doğuş-Çelikler-Özkar Joint-Venture will, commensurate to the Project’s risks and impacts, make the appropriate assessment documentation readily available to the affected communities, and where relevant other stakeholders, in the local language and a culturally appropriate manner”.

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

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

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<sup>1</sup> <https://equator-principles.com/>

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### 3. ROLES AND RESPONSIBILITIES

In addition to defining the Key Stakeholders, the roles and responsibilities of the main units and/or the persons who assigned as responsible for the implementation of the SEP and the Grievance Mechanism are defined under this heading.

The primary responsibilities of the Project are to coordinate stakeholder engagement activities and to support the stakeholders during the Project activities. The following are core tasks of the Client in the stakeholder engagement process;

- External communication system; to inform the stakeholders about the Project progress,
- Meeting; to public disclosure or information,
- Registration; to follow grievances and complaints,
- Tracking and Monitoring; to ensure fulfillment of the commitments,
- Social management programs; to ensure sustainability of the social benefit,
- Social investment programs; to contribute the PSIA particularly vulnerable groups.

In order to fulfill these roles and responsibilities, an Environmental and Social Management Unit (ESMU) is recommended to assign under Doğuş-Çelikler-Özkar Joint Venture Manager. ESMU can be constituted as a new unit for the management of the social and environmental issues of the Project or eligible employees under the current organization structure of the Doğuş-Çelikler-Özkar Joint Venture can be charged for carrying out the defined tasks in the ESMP and SEP.

Since the JV consists of three different companies, the most appropriate unit personnel should be determined with the contribution of all three companies to form the most functional and role-appropriate team for the ESMU, including all three companies, for the execution of the SEP and GM. ESMU will report to the Project Manager and will carry out its activities under the close supervision of the Project Manager.

Below, the roles and responsibilities defined for the construction period and the structure of the ESMU are presented.

**Table 2 Roles and Responsibilities**

| ROLE                        | RESPONSIBILITIES   |
|-----------------------------|--|
| <b>Project Manager</b>      | <ul style="list-style-type: none"> <li>• To provide the necessary resources for the approval and implementation of this Plan.</li> <li>• To follow up the performance of the Plan by making the necessary assignments.</li> </ul>  |
| <b>ESMU Officer</b>         | <ul style="list-style-type: none"> <li>• To ensure the compliance of the project with the requirements specified in the Plan</li> <li>• Coordination of the project activities related to the Plan,</li> <li>• To monitor the Plan in order to develop and improve and to make relevant audits and revisions.</li> <li>• To provide information to the Project Manager regarding the performance of the plan</li> <li>• To ensure the implementation of the Grievance Mechanism according to the Procedure</li> <li>• To report to the general manager by monitoring the GM</li> <li>• To prepare a practical training plan describing the GM procedure in all its aspects for the employees who have a role and responsibility in the functioning of the GM mechanism.</li> <li>• Identifying and organizing the participants of the training and ensuring that the training is given by the social expert</li> </ul> |
| <b>Public Relations and</b> | <ul style="list-style-type: none"> <li>• To conduct the field studies.</li> </ul>  |

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| <b>Communication Officer(s)-CLO(s)</b> | <ul style="list-style-type: none"> <li>To inform the Social Expert by recording the complaints and notifications received from the stakeholders in the field in the GM.</li> <li>Communication and coordination with all stakeholders within the framework of the plan</li> <li>Coordination of the communication with local people in emergencies,</li> <li>To register the complaints received from the Project hotline and to inform the social expert</li> <li>To carry out the review and evaluation of the actions taken in the Grievance Mechanism, as defined in the SMP, to plan corrective actions, to consult with the stakeholder and to close the complaint</li> </ul>  |
| <b>Social Expert</b>                   | <ul style="list-style-type: none"> <li>To plan the stakeholder engagement activities and ensuring that they are implemented according to their schedule.</li> <li>To inform the employees / sub-employers about this Plan,</li> <li>To monitor the sub-contractors' compliance and to supervise their implementation performance,</li> <li>To identify the deficiencies of the sub-contractors in the implementation of the SEP,</li> <li>To provide the necessary technical support to make the relevant measures / regulations,</li> <li>To monitor the Plan and inform the ESMU Manager/ Officer of any deficiencies identified and improvement suggestions to develop and improve this Plan.</li> <li>In the Grievance Mechanism for social category grievances, as defined in the SEP, to make an assessment, to plan corrective actions, to consult with the stakeholder and to close the complaint</li> <li>To monitor the corrective actions and monitoring the complaint closure process</li> <li>To provide support to the ESMU officer in the preparation of the training for the employees who have a role and responsibility in the operation of the GM mechanism,</li> <li>Developing and delivering training content</li> </ul> |
| <b>Environmental Expert</b>            | <ul style="list-style-type: none"> <li>To provide information to the Social Expert by registering environmental complaints arising from the activities of the project related to this Plan in the complaint mechanism.</li> <li>Investigating complaints in the Grievance Mechanism and planning corrective actions</li> <li>To monitor and inform the ESMU Manager / Officer of any deficiencies identified and improvement suggestions to develop and improve this Plan.</li> <li>To carry out the review and evaluation of the actions taken in the Grievance Mechanism, as defined in the SEP to plan corrective actions, to consult with the stakeholder and to close the complaint</li> </ul>  |
| <b>Health and Safety Specialist</b>    | <ul style="list-style-type: none"> <li>To ensure that the activities carried out within the factory are carried out in accordance with the Plan</li> <li>To evaluate the monitoring of the performance of this Plan and to inform the ESMU Manager / Officer of the identified deficiencies and improvement suggestions in order to ensure continuous improvement.</li> <li>To provide the information to the Social Expert by recording the complaints from the employees.</li> <li>Following up on OHS-related complaints and carrying out necessary studies, planning corrective actions on OHS issues.</li> <li>To carry out the review and assessment of the actions taken in the GM, as defined in the SEP, to plan corrective actions, to consult with the stakeholder and to close the complaint</li> </ul>  |

|  |                                   |  |
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## 4. STAKEHOLDER ENGAGEMENT

### 4.1. Approach

The SEP outlines a systematic approach to stakeholder engagement that will help Client to develop and maintain a constructive relationship with their stakeholders during all phases of the Yerköy-Kayseri High-Speed Railway (HSR) Project.

IFC defines stakeholder engagement as follows: “the term “stakeholder engagement” is emerging as a means of describing a broader, more inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches, and spans the entire life of a project”

*As for the SEP the IFC Sustainability Framework: Policy and Performance Standards on Environmental and Social Sustainability is being followed. It outlines a systematic approach to stakeholder engagement that will help investors build and maintain over time a constructive relationship with their stakeholders, in particular the locally affected communities.*

*As stated in IFC Performance Standard 1 - Environmental and Social Risk and Affect Assessment and Management, stakeholder engagement is the basis for building strong and constructive relationships in the successful management of environmental and social effects of a project.*

*As per the IFC standards, engagement of stakeholders is a continuous process with changing grades, stakeholder engagement consists of analyzing and planning stakeholders, informing stakeholders, establishing consultation and participation, creating a grievance mechanism, and continuously reporting to Affected Communities. The form, frequency and effort level of stakeholder engagement should be appropriate to the development stage with the risks and adverse effects that the project creates.*

In this respect, an ESIA Report has been prepared to meet the requirements of the IFC performance standards.

### 4.2. Identification of Stakeholders

Stakeholder identification is a key step in managing the overall stakeholder engagement process IFC defines stakeholder as follows: “Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses” (IFC,2007:10).

Stakeholder analysis is the first step of the stakeholder engagement process and it should be considered as the basis of stakeholder engagement management. Stakeholder identification is not only a work done at the beginning of the SEP process. When reaching to different phases of the Project or when the Project activities change, it will be necessary to include new stakeholders affected by the project.

This approach reveals that stakeholder identification and updating the studies will take place in all stages of SEP. In this sense, defining the stakeholders is not considered as a completed stage at the beginning of the Stakeholder Engagement Plan, but as a process that is followed up and monitored throughout the Project lifecycle. A stakeholder-oriented approach is adopted in all stages of the pre-construction, construction, and operation maintenance phases of the Project. In addition, while the Stakeholder Engagement Plan is implemented, monitoring and evaluation activities will play a very important role in the process of updating stakeholders and tools.

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The identified stakeholders were reviewed by Project experts, managers, consultants and key stakeholders. At this stage, the geographical impact area of the project has been determined according to the project phases. At this stage, not only the construction area of the Project but also,

- Nearby facilities,
- Other activities ongoing around the project area,
- Transport routes,
- Areas that may be affected by potential cumulative impacts,
- Project results impact area,
- Vicinity settlements,

Area of influence determination methodology used in the Project ESIA, DEIA(Diversity, Equity, Inclusion, and Accessibility) documents have been assessed and stakeholder engagement activities have been carried out to define the geographical impact area are considered to define the Project affected area.

A comprehensive list of stakeholders has been prepared for the Yerköy-Kayseri High-Speed Railway (HSR) Project.

Stakeholders have been identified as the following diagram;

- International organizations,
- National organizations,
- National / regional governmental bodies,
- Local governments or authorities,
- People/ community living in the vicinity of the Project area,
- Farm, mine, business, workplace, industrial or commercial areas in the surrounding area
- National or local NGOs,
- Professional chambers, trade, industry, agriculture chambers, cooperatives, sectoral organizations, labor associations or unions,
- Local and/or national media,
- Vulnerable groups: the elderly, the disabled, female-headed households, poor households and/or persons, illiterate persons, ethnic minorities, immigrants, refugees, etc.
- Suppliers, service providers,
- Sub-contractors,
- Project employees.

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## 5. STAKEHOLDERS

### 5.1. External Stakeholders

External Stakeholders of the Yerköy-Kayseri High-Speed Railway (HSR) Project indicate an external stakeholder who is affected by or influences the activity. Public institutions and local people affected by the activity are also within this scope.

#### Local Communities

Local communities directly affected by the Project were identified and expanded during the expropriation data and ESIA field studies.

The visits made within the scope of ESIA field studies led to the identification of other affected settlements in addition to the expropriation data. These settlements are shown in the table below.

As part of the ESIA, SEP studies, the neighborhoods on both sides of the high-speed railway line in Yozgat, Nevşehir and Kayseri were consulted.

The first phase of the fieldwork was completed according to the schedule below. 283 household surveys with directly (278 household for 463 parcels) and indirectly (5) households, 36 community level surveys with muhtars and 45 catch interviews with PAPs were conducted.

**Table 3 Local Communities around the Project Area**

| Province | District   | Settlement      | App. number of permanent residents | Permanent population | App. number of temporary/seasonal households | Temporary/seasonal population |
|----------|------------|-----------------|------------------------------------|----------------------|--|-------------------------------|
| YOZGAT   | YERKÖY     | YAMUKLAR        | 60                                 | 250                  | 65   | 300                           |
| YOZGAT   | YERKÖY     | CAKCAK          | 13                                 | 50                   | 20   | 75                            |
| YOZGAT   | YERKÖY     | KARAOŞMANOĞLU   | 12                                 | 5                    | 32   | 15                            |
| YOZGAT   | YERKÖY     | YÜZÜNCÜ YIL     | 2000                               | 8000                 | unknown                                      | unknown                       |
| YOZGAT   | YERKÖY     | DELİCE          | 40                                 | 120                  | 50   | 150                           |
| YOZGAT   | ŞEFAATLİ   | BAŞKÖY          | 50                                 | 100                  | 85   | 200                           |
| YOZGAT   | ŞEFAATLİ   | DEDELİ          | 50                                 | 200                  | 50   | 200                           |
| YOZGAT   | ŞEFAATLİ   | KAZLIUŞAĞI      | 35                                 | 175                  | 4  | 15                            |
| YOZGAT   | ŞEFAATLİ   | TAHİROĞLU       | 45                                 | 250                  | 20   | 80                            |
| YOZGAT   | ŞEFAATLİ   | HAMZALI         | 25                                 | 70                   | 30   | 90                            |
| YOZGAT   | ŞEFAATLİ   | KUZAYCA         | 250                                | 654                  | 400  | 2500                          |
| YOZGAT   | YENİFAKILI | YİĞİTLER        | 145                                | 227                  | 200  | 300                           |
| YOZGAT   | YENİFAKILI | FEHİMLİ         | 230                                | 720                  | 40   | 150                           |
| YOZGAT   | ŞEFAATLİ   | MEHMETAKİFERSOY | 600                                | unknown              | 100  | unknown                       |
| YOZGAT   | YENİFAKILI | YAZLAK          | unknown                            | unknown              | unknown                                      | unknown                       |
| NEVŞEHİR | KOZAKLI    | KANLICA         | 150                                | 250                  | 250  | 450                           |

| Province | District   | Settlement   | App. number of permanent residents | Permanent population | App. number of temporary/seasonal households | Temporary/seasonal population |
|----------|------------|--------------|------------------------------------|----------------------|--|-------------------------------|
| NEVŞEHİR | KOZAKLI    | KARASENİR    | 300                                | 500                  | 700  | 5000                          |
| KAYSERİ  | KOCASINAN  | BOĞAZKÖPRÜ   | 60                                 | 125                  | 60   | 125                           |
| KAYSERİ  | KOCASINAN  | BEYDEĞİRMENİ | 20                                 | 100                  | unknown                                      | unknown                       |
| KAYSERİ  | KOCASINAN  | DÜVER        | 120                                | 560                  | 200  | 1000                          |
| KAYSERİ  | KOCASINAN  | ELMALI       | 22                                 | 80                   | 40   | 160                           |
| KAYSERİ  | KOCASINAN  | HİMMETDEDE   | 500                                | 1000                 | 750  | 3000                          |
| KAYSERİ  | KOCASINAN  | MAHZEMİN     | 700                                | 2000                 | 700  | 2500                          |
| KAYSERİ  | KOCASINAN  | OYMAAĞAÇ     | 120                                | 600                  | 20   | 80                            |
| KAYSERİ  | KOCASINAN  | YEMLIHA      | 980                                | 5000                 | 1200   | 8000                          |
| YOZGAT   | YERKÖY     | ESKİYERKÖY   | 10                                 | 30                   | unknown                                      | unknown                       |
| YOZGAT   | YERKÖY     | KAHYA        | 30                                 | 100                  | unknown                                      | unknown                       |
| YOZGAT   | ŞEFAATLİ   | AKÇAKOYUNLU  | 25                                 | 110                  | 5  | unknown                       |
| YOZGAT   | ŞEFAATLİ   | CAFERLİ      | 35                                 | 110                  | 20   | 80                            |
| YOZGAT   | ŞEFAATLİ   | CANKILI      | 25                                 | 110                  | 35   | 230                           |
| YOZGAT   | ŞEFAATLİ   | ÇAYDOĞAN     | 25                                 | 110                  | 35   | 300                           |
| KAYSERİ  | KOCASINAN  | KALKANCIK    | 100                                | 300                  | 50   | 200                           |
| KAYSERİ  | KOCASINAN  | KARAKİMSE    | 50                                 | 200                  | 60   | 300                           |
| KAYSERİ  | KOCASINAN  | MOLU         | 40                                 | 400                  | 100  | 400                           |
| YOZGAT   | ŞEFAATLİ   | ALİFAKILI    | 50                                 | 35                   | 150  | 2                             |
| YOZGAT   | BOĞAZLIYAN | ÖZLER-FETİH  | 260                                | 5000                 | 600  | 3                             |

In the Area of Influence, there are 19 residential buildings on 18 parcels affected by the project's land acquisition. RAP document includes the assessments on parcels with residential building at Table 5-38 under the 5.1.1 Residential buildings and affected houses section.

In addition, there are a total of 10 commercial buildings in 8 parcels affected by the land acquisition of the project. RAP document includes the assessments on parcels with commercial building at Table 5-40 under the 5.1.2 Commercial buildings and affected businesses.

Owners, shareholders and users of all these defined structures are the PAPs of the Project.

### Vulnerable Groups

Additional effort throughout the Project's lifetime to ensure participation of the entire community from the early stages of the Project, regardless of gender, age, literacy, illness, physical or mental disability, poverty, religion, political or other opinions, national or social origin, property, birth or status; and measures will be applied.

Persons with disabilities, women head of households, poor households, elderly households, illiterate, ethnic groups or refugees were considered as vulnerable groups within the Project Aol. Alternative tools will also be used under both SEP and GM to ensure meaningful participation of these groups in the Project process.

In addition to ensuring the meaningful participation of vulnerable groups, measures will be implemented to ensure equal and meaningful participation of male and female PAPs in the Project processes.

### Public Institutions and Organizations

The classification and definition of public institutions and organizations were determined according to the approaches and steps described above.

- Public institutions and organizations are classified under the following categories;
- Public Administrations at National Level
- Public Administrations at Province Level
- Regional Official Bodies
- local stakeholder
- Non-Governmental Organizations at National Level
- Academics Institutions

The classification of institutions according to their impact/interest from the project is also presented in Table 4 Project Stakeholders below.

### Project External Stakeholders

Table 4 Project External Stakeholders

| Stakeholder Categories                   | Stakeholders  | Affected |          | Interested/<br>influenced |
|--|---|----------|----------|---------------------------|
|  |   | Direct   | Indirect |                           |
| Public Administrations at National Level | Ministry of Transport and Infrastructure  | X        |          |                           |
|  | Ministry of Energy and Natural Resources  | X        |          |                           |
|  | Turkish Electricity Transmission Corporation  | X        |          |                           |
|  | Electricity Generation Company  |          | X        |                           |
|  | Ministry of Environment, Urbanization and Climate Change                            | X        |          |                           |
|  | Ministry of Industrial and Technology   | X        |          |                           |
|  | Ministry of Agriculture and Forestry  | X        |          |                           |
|  | Ministry of Treasury and Finance  | X        |          |                           |
| Public Administrations at Province Level | Yozgat/Nevşehir/Kayseri Governorship  | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Governorship Provincial Planning and Coordinate Directorate | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Provincial Directorate of Environmental and Urbanization    | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Provincial Disaster and Emergency Directorate               |          | X        |                           |
|  | Yozgat/Nevşehir/Kayseri Forest Operation Directorate                                |          | X        |                           |
|  | Yozgat/Nevşehir/Kayseri Provincial Directorate of Agriculture and Forestry          | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Provincial Directorate of Industry and Technology           | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Provincial Directorate of Trade                             |          | X        |                           |
|  | State Hydraulic Works 12th Regional Directorate                                     |          |          | X                         |
|  | 6th Regional Directorate of Highways  | X        |          |                           |
|  | Yozgat/Nevşehir/Kayseri Municipality  | X        |          |                           |
| Yozgat Special Provincial Administration | X   |          |          |                           |

|   |  |   |  |   |
|---|--|---|--|---|
|   | Nevşehir Special Provincial Administration   | X |  |   |
|   | ORAN Development Agency  |   |  | X |
|   | Ahiler Development Agency  |   |  | X |
| <b>Regional Official Bodies</b>                         | Yerköy/Şefaati/Yenifakılı/Yüreğir/Boğazlıyan/Kozaklı/Kocasinan District Governorship                     | X |  |   |
|   | Police Department of Yerköy/Şefaati/Yenifakılı/Yüreğir/Boğazlıyan/Kozaklı/Kocasinan                      |   |  | X |
|   | Military of Yerköy/Şefaati/Yenifakılı/Yüreğir/Boğazlıyan/Kozaklı/Kocasinan                               |   |  | X |
| <b>Local Stakeholders</b>                               | Mukhtars of the Project Affected Settlements   | X |  |   |
|   | Local Communities Around the Project Area  | X |  |   |
|   | Vulnerable Groups in the Project Aol   | X |  |   |
|   | Local SMEs   | X |  |   |
| <b>Non-Governmental Organizations at National Level</b> | Worldwide Fund for Nature (WWF)  |   |  | X |
|   | The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA) |   |  | X |
|   | Institution of Nature  |   |  | X |
|   | Miners Association of Türkiye  |   |  | X |
|   | Association of Historical Towns  |   |  | X |
|   | The Foundation for the Promotion and Protection of the Environment and Cultural Heritage (ÇEKÜL)         |   |  | X |
| <b>Academicals Institutions</b>                         | Greenpeace   |   |  | X |
|   | Bozok University (Yozgat)  |   |  | X |
|   | Kapadokya and Nevşehir Hacı bektas Veli Universities (Nevşehir)  |   |  | X |
|   | Erciyes and Abdullah Gül Universities (Kayseri)  |   |  | X |

## 5.2. Internal Stakeholders

Internal Stakeholders are the managers and staff of the Yerköy-Kayseri High-Speed Railway (HSR) Project and the Doğuş-Çelikler-Özkar Joint Venture, to which it is affiliated, as well as the sub-contractor subsidiaries, representatives and suppliers. Communication with internal stakeholders is important in relationships to be established with external stakeholders. The list of internal stakeholders identified is given below.

- Doğuş-Çelikler-Özkar Joint Venture Members of the Board of Directors
- Doğuş-Çelikler-Özkar Joint Venture Yerköy-Kayseri Principal of the High Standard Train Project
- Yerköy-Kayseri High Standard Train Project Executives
- Yerköy-Kayseri High Standard Train Project Personnel
- Sub-contractors
- Suppliers

Stakeholder identification of the Project aim to ensure that all project affected groups both women and men, vulnerable and disadvantaged groups, diverse groups, all organizations and institutions interested in the Project results are included into the meaningful participation throughout the Project lifecycle according to the gender and social inclusion objectives. During the stakeholder defining process a wide approach covering all stakeholders related to the Project will also allow the Project to be evaluated and managed properly in all aspects.

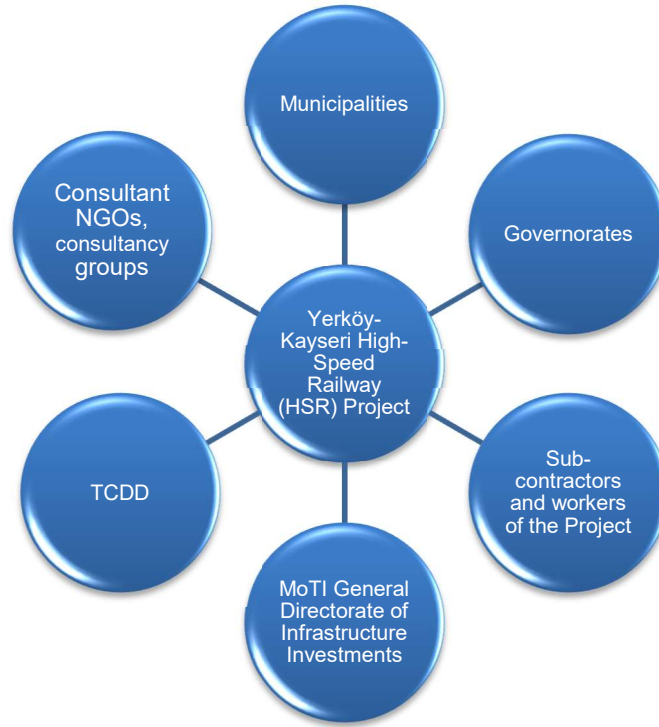
Therefore, vulnerable groups will be a part of the stakeholder identification plan. Vulnerable groups/people in the Project area will be identified through the socio-economic study conducted as part of the ESIA studies. The Project will identify and consult specifically with potentially vulnerable groups such as women headed households, women, poor, disabled and elderly people. Special meetings for vulnerable groups; e.g. women meetings will be held on village level to make sure that their concerns are addressed as well. It is important to note that a special effort will be made to identify who are the most vulnerable among the potentially affected and are special engagement efforts necessary.

## 5.3. Key Stakeholders

Key stakeholders are significantly affected by the project and have a direct and significant impact on the project. Key Stakeholders can consist of both internal and external stakeholders. Identifying key stakeholders is one of the important stages in the stakeholder analysis process. It is important to clearly identify key stakeholders for the success of the social, environmental management and stakeholder engagement process.

During the consultations and/or information meetings with the key stakeholders, the issues, concerns and questions related to the Project, as well as the recording, feedback and consultation activities will be carried out. The diagram below shows the key stakeholders of the Project.

|  |                                   |  |
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**Figure 2 Key Stakeholders of the Project**

## 6. IDENTIFICATION OF COMMUNICATION AND INFORMING CHANNELS

Public disclosure is one of the main steps of stakeholder engagement. Verbal, written and visual sources could be used as the informing tools. The most important verbal sources are meetings, which could be organized in a several periods. Brochures, leaflets, posters and advertisement are both written and visual tools to inform. Besides, the official website could contain different information sources. In this sense, the website is the most useful and effective mechanism of communication, inform and disclosure.

### 6.1. Tools And Methods For Stakeholder Engagement

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the life of the Project. Active communication will be maintained with identified stakeholders throughout the life of the project.

Tools and methods defined for stakeholder engagement; it has been diversified and expanded in order to enable all Stakeholders to access the Project by means of their own preference and most convenient access. The methods and tools of stakeholder engagement of the Project are described below. First of all, the methods and tools that are suitable for the restrictions and measures in the Covid-19 process are explained, then the methods and tools that are recommended to be used when the new normalization process and when the conditions are suitable, are defined.

The tools identified below will be used for both internal and external grievance mechanism. Communication tools and complaint-receiving methods have been diversified so that all stakeholders can easily convey their complaints.

**Project Website:** ([www.yerkoykayseriyht.com](http://www.yerkoykayseriyht.com)) The project website will be one of the tools that are active in the stakeholder engagement process during the operational period. It is used especially for making general information, publishing announcements, sharing documents or reports about the project.

**Consultation Meetings:** Consultation meetings will be held as needed throughout the Project process. Detailed information about the Project will be given and questions and opinions of stakeholders will be evaluated. Consultation meetings will be held as needed during periods or issues that require the Project's consultation with stakeholders.

In cases where consultation is required, consultations will be carried out using online tools during the Covid-19 process.

In these meetings, the current developments of the Project will be explained, information will be given about the resettlement / relocation process, and ideas and expectations will be discussed during these processes.

**In-Depth Interviewing:** In-depth interviewing is a qualitative research technique that involves intensive individual interviews with a small number of participants to examine their perspectives on a particular idea, program or situation. In this case, in-depth interviews will be conducted with stakeholders such as national and local government agencies/organizations, cooperatives etc. to analyze the potential impacts of the Project on management and businesses and to evaluate their expectations/advice through planning.

**Focus Group Discussion:** Focus group interviews can be conducted when there is a need for data collection and qualitative fieldwork during the monitoring process. Focus group studies, which are held in the form of face-to-face meetings, can be carried out online during the Covid-19 process or face-to-face if conditions allow after the new normalization process. FGD is an effective way to bring together people from similar experiences to discuss a specific topic related to the Project.

**Socio-Economic Research:** Economic and social conditions affect each other positively or negatively. There is a direct connection between economic factors such as livelihoods of the society, income level, job and unemployment and social life. Therefore, economic parameters determine social standards.

Within the scope of the Project, research will be carried out in order to reveal the socio-economic status of stakeholder groups.

**Surveys:** Survey studies will be used when data collection is required during the Project process, and it is planned to be carried out online through online tools during the Covid-19 process.

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**Presentations:** Visual material will also be used during the informing phase of the stakeholders. Presentations containing summaries of written documents will be made.

**Project Brochure:** At the first stage, brochures / flyers with communication channels, announcements and information about the Project will be left in the common public areas in the surrounding settlements, in the headman's offices, in the municipalities, in the provincial directorates, and in the professional chambers..

**E-mail addressed to external stakeholders:** Stakeholders can be reached via this e-mail (info@yerkoykayseriyht.com) by the Project authorized persons on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested.

**Notification of Requests of Employees via e-mail address and website:** Notification of Employees' Requests via e-mail address and website: A web communication procedure has been developed as a part/tool of the website (www.yerkoykayseriyht.com) established to provide feedback to all employees. Employees will be notified via info@yerkoykayseriyht.com e-mail address. The feedback received in these areas will be recorded in the Grievance Mechanism and the process will be operated.**Official accounts of the project:** Announcement/information will be made when necessary during the operation phase of the Project with social media accounts that are becoming widespread during the Covid-19 process.

**Online meetings:** In the Covid-19 process, consultation and information meetings will be held especially with Key Stakeholders using online meeting tools.

**Grievance Mechanism:** The GM is an important stakeholder engagement management tool and method to be used throughout the project, which will include the operation of the process where the notifications, feedback, information and complaints of the stakeholders will be kept. The complaints will be evaluated and monitored, and the results will be consulted to the stakeholders with feedback.

It is planned to use the following tools and methods simultaneously to ensure stakeholder participation of disadvantaged groups, illiterate groups, disabled people and refugee groups with language problems, who do not have access to the Internet, smartphones, social media or e-mail.

## **ALTERNATIVE TOOLS**

The following tools and methods are planned to be used in order to ensure equal and meaningful participation of vulnerable groups and disadvantaged groups who do not have access to the internet, smartphones, social media or e-mail to the Project SEP processes and to ensure their access to the grievance mechanism without difficulty.

**Letter/mail:** Project brochures, postings, reports or announcements can be sent by post, courier or letter so that disadvantaged stakeholders who do not have access to the Internet, smartphones, social media or e-mail can access Project information and be an effective part of the Stakeholder engagement process.

**Sharing of general information notices in public spaces or common areas or on bulletin boards:** Announcements and information posters of the communication channels related to the Project will be made available in the common public spaces in the surrounding settlements, in the headman's offices, in the municipalities, in the Provincial directorates, in the boards in the stakeholder professional chambers.

**Posters / brochures / flyers:** Brochures / flyers about the Project will be left in common public areas in the surrounding settlements, headman's offices, municipalities, provincial directorates, professional chambers.

**Publication of announcements/advertisements in the local press:** Announcements and announcements will be published at the stages and situations required by the project.

**Project complaint boxes for external stakeholders:** Complaint boxes, where stakeholders can convey their complaints, suggestions and opinions, will be placed at points accessible to disadvantaged stakeholder groups and vulnerable groups affected by the project.

|  |                                   |  |
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**Questionnaire/feedback forms:** Questionnaires and feedback forms will be posted online on the project website, shared on social media accounts or as links via e-mail, and will also be available in printed form at the points where the complaint boxes are located.

**Hotline:** A hotline has been defined so that project stakeholders can reach the Project and convey their complaints, opinions and suggestions. The phone number of the public relations unit is 0539 935 8461. This phone number is specially designed to enable stakeholders who have problems in accessing the internet to participate more actively in the participation process. The telephone number will be posted on stakeholder institutions such as provincial directorates, municipalities, mukhtars of the affected surrounding settlements and the public spaces they share.

## 7. PREVIOUS ENGAGEMENT ACTIVITIES

### 7.1. Public Participation Meetings

Public Participation Meetings (PPM) were conducted within the scope of the Project to inform the stakeholders on the Project activities and to receive their opinions and suggestions in compliance with the Article-9 of the “EIA Regulation”, dated 25/11/2014 and numbered 29186, were conducted in each affected provinces including Yozgat, Nevşehir and Kayseri Provinces.

The outputs of the PPMs including locations, dates, number of the participants and the general outputs are summarized in Table 5.

**Table 5: Public Participation Meetings**

| Province/<br>District | Meeting Place                                    | Date/ time             | Number of<br>Participant*s* | Outputs*  |
|-----------------------|--|------------------------|-----------------------------|---|
| Kayseri/<br>Kocasinan | Himmedede<br>Neighborhood<br>Republic Square     | 30/10/2017<br>02:00 PM | Approximately 24<br>people  | In Kayseri Province, the project was approved by the General Directorate of Infrastructure Investments. Suggestions were made about the need to pass through the route.   |
| Nevşehir/<br>Kozaklı  | Karasenir Village<br>Coffehouse                  | 31/10/2017<br>10:00 AM | Approximately 19<br>people  | The outputs of the Nevşehir PPM is similar with Kayseri and Yozgat provinces. A station was requested in Nevşehir Province However accordin to the technical works it has been stated that it is not planned to construct a station. Another issue that rose during the PPM in Nevşehir Province is releted with the operation phase of the Project especially community health and safety issues including possible fire and the participants were informed on the applicable mitigation measures. |
| Yozgat/<br>Şefaati    | Şefaati Family<br>Life Center<br>Conference Hall | 31/10/2017<br>02:00 PM | Approximately 26<br>people  | In Yozgat Province, the technical and physical characteristics of the Project, speed limits, and the access points including culverts etc. and the information on the expropriation process were asked and detailed explanations and the mitigation measured were explained to the participants. Also, expropriation questions were asked about the processes.  |

\*References: Yerköy – Sefaattli – Kayseri Railway Project, Final EIA Report, 2019

\*\* Public participation report was not given in the final EIA report. The approximate number of people has been determined from the photographs.

In the first phase of the fieldwork, surveys were conducted directly with (278 households for 463 parcels) and indirectly (5) households with 283 households, 36 surveys with headmen at community level, and 45 capture interviews with PAPs. After the obtained data were checked, in the second stage of the field study, a field study was carried out to fill the gap.

The following engagement activities were carried out with mukhtars, institutions and women living in Project Aol. Details of Stage 2 Social Area studies are given in the table below.

**Table 6 Featured Topics in the Phase 2 Social Field Study**

| Date       | Institution  | Interviewed Unit   | Featured topics   |
|------------|--|--|---|
| 29.07.2022 | Yerköy Irrigation Association  | İsmail Gizlenci/ Expert  | District lands irrigation methods<br>Land qualities   |
| 29.07.2022 | Yerköy Municipality  | Mayor of Yerköy Reconstruction and Urbanization Unit   | The effect of the YHT route on the urban area<br>The effect of the YHT route on the rural area<br>Impact of the Project on workforce and employment<br>Project opportunities and impacts  |
| 29.07.2022 | Yerköy District Directorate of Agriculture and Forestry                              | District Agriculture Manager<br>District Agricultural Experts  | Agricultural products with significant added value locally<br>Distribution of agricultural activities<br>Irrigation<br>agricultural problems<br>Potential impacts of the Project on agricultural activities<br>Potential impacts of the Project on agricultural lands |
| 29.07.2022 | Yenifakılı District Directorate of Agriculture and Forestry                          | District Agriculture Manager<br>District Agricultural Experts  | Agricultural products with significant added value locally<br>Distribution of agricultural activities<br>Irrigation<br>agricultural problems<br>Potential impacts of the Project on agricultural activities<br>Potential impacts of the Project on agricultural lands |
| 29.07.2022 | Şefaattli District Directorate of Agriculture and Forestry                           | District Agriculture Manager<br>District Agricultural Experts  | Agricultural products with significant added value locally<br>Distribution of agricultural activities<br>Irrigation<br>agricultural problems<br>Potential impacts of the Project on agricultural activities<br>Potential impacts of the Project on agricultural lands |
| 30.07.2022 | Yerköy-Yenifakılı-Women's Focus Group meeting  | Yenifakılı -Yiğitler Women's Focus Group meeting   | Concerns and views of women on Project construction and operational process impacts<br>Project opportunities and women's suggestions<br>The place of women in labor and employment<br>Possible impacts of the Project on daily life                                   |
| 30.07.2022 | Interview with the owners/users of residences and workplaces affected by the project | In Yenifakılı Yazlak 442/8, a workplace survey was conducted with the business located in the parcel where the household survey was conducted. | Economic level of livestock commercial activities in the workplace<br>Socio-economic livelihoods of households and workers<br>Evaluation of project impact  |

|            |  |   |  |
|------------|--|---|--|
|            |  | The household was visited and discussed in depth.   |  |
| 30.07.2022 | In-depth interview and workplace survey with the workplace affected by the project   | Yuzuncuyil District passes by taking a part of YHT Pırlanta Wedding Hall parcel. In-depth interviews and workplace surveys were conducted.  | Economic level of business activities in the workplace<br>The owner and operator of the workplace, the household, and the socio-economic livelihoods of the employees<br>Evaluation of project impact  |
| 30.07.2022 | Yerköy-Yenifakılı-Şefaatli workplace and residential site visits in affected districts   | Interviews were held with the owners of the houses in Cakcak 137/1 and 137/2  | Evaluation of the current vulnerability of households over the age of 65<br>Evaluation of the impact of the project impact on households and housing<br>Socio-economic status of the household   |
| 31.07.2022 | Kozaklı-Kocasinan workplace and residential site visits in affected districts<br>Woman depth-interview<br>Kanlıca/ Molu Villages | A workplace/commercial meeting was held with the vineyards directly affected by the project expropriation and with the owner of the production facility, Formation Molu. In-depth interviews were held on women in the company affected by the Project, which has a wide field of activity in women's employment. | Economic and social impacts resulting from the project impact<br>Workplace workers and livelihoods<br>Produced products and added value<br>Women's employment and the role of the workplace in women's labor force participation   |
| 01.08.2022 | Kayseri ORAN Development Agency  | Meeting with Rural and Social Development Unit Manager Yasin Sicin and Institution Specialist Ali Bey.  | Opinions on the railway route<br>The impact of the railway route on the Kayseri workforce<br>Effects on the railway route and urban area<br>Impacts on the railway route and the countryside<br>Project impacts on workforce and employment in Kayseri<br>Possible impacts of the Project on rural development |
| 01.08.2022 | Kocasinan District Directorate of Agriculture and Forestry   | Meeting with the Deputy Director and Experts of Kocasinan District Agriculture and Forestry Directorate   | Agricultural products with significant added value locally<br>Distribution of agricultural activities<br>Irrigation<br>agricultural problems<br>Potential impacts of the Project on agricultural activities<br>Potential impacts of the Project on agricultural lands  |

## 8. STAKEHOLDER ENGAGEMENT PROGRAM

The stakeholder engagement plan should be updated periodically. In addition, it should be included in the studies/surveys that are likely to be carried out in a way to cover the Social Impact Assessment or Settlements that can be carried out within the scope of the Project.

### 8.1. Engagement of the Vulnerable Groups and Women

Many national or international organizations require the support of individuals/ communities who are particularly vulnerable to the negative impacts and risks of the facility.

In the region where the project is to be installed (Yozgat, Nevşehir, Kayseri), a separate work program will be carried out to identify people who often do not have sufficient representation opportunities in public processes, including disabled people, women, people who do not speak Turkish, the elderly, etc.

The methods and tools described under this heading will be implemented in such a way as to ensure that women are included in the Project process as much as men, their meaningful participation in the Project engagement process and that they can easily express their views.

In this context, the following studies will be implemented as Project enhancement activities to be implemented within the scope of Stakeholder Engagement:

- Women who will take part in the project CLO will also provide information about the Project for women.
- Information meetings will be held in places where women's participation will be more comfortable, instead of places such as village cafes and mosques, which play a role in reducing women's participation.
- If the participation of women in the meetings held in local settlements is very low, additional women's meetings will be organized.
- Equal feedback or opinions will be received from men and women on Project issues related to the village.
- By identifying the communication tools that women can access most easily, these tools and methods will be kept active for complaint management and for women to easily convey their complaints.
- For vulnerable groups who are illiterate or have difficulty in communicating in writing, information will be provided by telephone, regular visits and their complaints will be submitted.
- A proactive approach will be taken to ensure that vulnerable groups benefit from the opportunities within the scope of the Project and the supports where they are entitled.
- Facilitating support (transportation, technical support, etc.) will be provided to vulnerable groups when they need application, access to facilities, official institutions or documents.

### 8.2. Policy

There is not currently Public Relations Policy, Environmental Policy and Quality Management System Policy for the Yerköy-Kayseri High-Speed Railway (HSR) Project. The policies to be created together with the project will continue throughout the life of the project. In addition, the policies to be created within the scope of the project will be published on the official website of the project.

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### 8.3. Disclosure Phase

The The Disclosure process is the process that will begin after the plans for the Project are approved. The ESIA package (ESIA, NTS, SEP, RAP, HRIA) is implemented during the ESIA disclosure period, in line with the communication tools defined in the SEP, and covering all project-affected groups, all stakeholders. As part of the disclosure process, the ESIA information package will be published (on behalf of the employer) on the project website ([www.yerkoykayseryht.com](http://www.yerkoykayseryht.com)).

NTS, SEP and management plans will be explained in Turkish using appropriate disclosure methods in line with the relevant requirements of international standards. Hard copies of the ESIA package will be kept at the project site for stakeholder review.

It will be kept especially in mukhtars, NGOs or institutions working with vulnerable groups. During the disclosure process, support will be provided to inform all vulnerable groups within the Project AoI. Methods such as facilitating access to meetings, holding direct private meetings with sensitive groups, and having one-on-one meetings will also be used during the disclosure process.

The social expert/ Public relations specialist who will be involved in the project will be in contact with the local communities and stakeholder engagement activities will be recorded in the stakeholder participation registration list.

The stakeholder engagement program covering the activities to be carried out during the disclosure phase is given in Table 7.

In the post-ESIA phase, the SEP will be implemented throughout the project. Again, the stakeholder engagement program covering the activities to be carried out in the post-ESIA process is given in Table 7. Stakeholder engagement activities and communication tools with key stakeholders for work components under the direct responsibility of the contractor during the operation phase will continue under the responsibility of the relevant project management team. Creditor and creditor communication will be carried out by the contractor's senior management team throughout the construction phase.

|  |                                   |  |
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#### 8.4. E&S Reporting to local communities

E&S Reports will be disclosed to the to local communities.

E&S performance of the Project will be regularly disclosed to local communities.

Reporting will be disclosed as follow.

##### Annual Environmental and Social Reports

- Annual reports will be disclosed in web site of the Project.
- Annual reports will be presented to the key stakeholders of the Project at the end of the Project year, in December or November.
- Annual Environmental and Social Reports will be provided to the local stakeholders as hardcopy, if requested.
- Annual Environmental and Social Reports will be disclosed both in Turkish and English.
- Annual Environmental and Social Report can include an update on any project components, impacts, or mitigation measures and plans that were not envisaged or disclosed as part of the ESIA.

##### Quarterly and Semi-Annual Environmental and Social Reports

- Quarterly and Semi-Annual reports will be disclosed in web site of the Project.
- Quarterly and Semi-Annual reports will be shared to the key stakeholders via e-mail or online/ face to face meetings if needed.

##### Updating Reports or Supplementary Report

If an addendum is made to any report, any part of the SEP, GM or ESIA is revised or improved, the reports are disclosed to the local public.

The hard copy of the updated SEP document is sent to the local authorities and updated versions are shared on the website.

PAPs are informed via headmen that the SEP or GM has been updated.

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### 8.5. Stakeholder Engagement Programme

This program will be revised in accordance with the following flow when the calendar for the phases of the Project is determined, with the clarification of dates and location information, and the implementation process will be updated in accordance with SEP and GM procedures and principles to support Project activities at every stage.

The program of stakeholder consultation activities that the project should fulfill in the pre-construction, construction process and transition phases is given below. The program presents together the stakeholders defined in this document and the consultation methods to be used.

#### Table 7 Stakeholder Engagement Programme

|  |                                   |  |
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| Project stage              | Target stakeholders   | Topic(s) of engagement   | Engagement Tool  | Location  | Frequency                            | Responsibilities |
|----------------------------|---|--|--|---|--------------------------------------|------------------|
| <b>Before Construction</b> | <b>Project Affected People</b> <ul style="list-style-type: none"> <li>PAPs affected by the expropriation (landowners, land users, businesses, physically displaced people)</li> <li>Residents of the settlements in the social area of influence</li> <li>Vulnerable people</li> <li>Women<sup>2</sup></li> </ul> | Land acquisition & Expropriation and compensation process  | Community meetings<br>Face to face meetings  | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas                  | Before construction activities begin | AYGM             |
|                            | <b>Governmental Parties</b> <ul style="list-style-type: none"> <li>Municipalities</li> <li>Governors</li> <li>District authorities</li> <li>Academic institutions</li> </ul>  | Land acquisition & Expropriation and compensation process  | Face to face meetings  | Project office as per the request of the PAPs<br>Key stakeholders in the affected districts<br>Key stakeholders in the affected provinces         | Before construction activities begin | AYGM & JV        |
|                            | <b>Non-governmental Parties</b> <ul style="list-style-type: none"> <li>Press and media;</li> <li>NGOs;</li> <li>Businesses and business organisations;</li> <li>Workers' organisations;</li> </ul>  | Land acquisition & Expropriation and compensation process  | Face to face meetings  | Affected districts and Provinces<br>Project office as per the request of the PAPs<br>NGO's Project offices as per the request of the stakeholders | Before construction activities begin | AYGM & JV        |
|                            | <b>Project Affected People</b> <ul style="list-style-type: none"> <li>PAPs affected by the expropriation (landowners, land users, businesses, physically displaced people)</li> <li>Residents of the settlements in the social area of influence</li> <li>Vulnerable people</li> </ul>                            | <b>SEP and ESIA field studies stakeholder engagements</b><br>Social and environmental impact assessment<br>Stakeholder engagement<br>Grievance mechanism process<br>Employment | Community meetings<br>Face to face meetings<br>Focus Group Meetings<br>In-depth interviews | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas                  | Before construction activities begin | Consultant & JV  |

| Project stage | Target stakeholders  | Topic(s) of engagement  | Engagement Tool   | Location  | Frequency  | Responsibilities |
|---------------|--|---|---|---|--|------------------|
|               | <ul style="list-style-type: none"> <li><b>Women</b></li> </ul>   | Vulnerability and gender issues<br>Community health and safety issues   | Survey  |   |  |                  |
|               | <b>Project Affected People</b> <ul style="list-style-type: none"> <li>PAPs affected by the expropriation (landowners, land users, businesses, physically displaced people)</li> <li>Residents of the settlements in the social area of influence</li> <li>Vulnerable people</li> <li><b>Women</b></li> </ul> | Introduce CLOs of Doğuş-Çelikler-Özkar Joint Venture:<br>Project update<br>Resettlement and livelihoods<br>Disclosure of the SEP and Grievance mechanism process<br>Employment<br>Vulnerability and gender issues<br>Community health and safety issues | Community meetings<br>Face to face meetings<br>Focus Group Meetings<br>In-depth interviews<br>Survey<br>Project brochure<br>Poster / Brochures / flyers | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas          | Before construction activities begin   | JV               |
|               | <b>Governmental Parties</b> <ul style="list-style-type: none"> <li>Municipalities</li> <li>Governors</li> <li>District authorities</li> <li>Academic institutions</li> </ul>   | <b>Disclosure of the ESIA package</b>   | Face to face meetings<br>Project brochure<br>Providing hard copies of the Reports by courier, mail or hand delivery                                     | Project office as per the request of the PAPs<br>Key stakeholders in the affected districts<br>Key stakeholders in the affected provinces | Immediately after the reports are approved, before the construction process begins | JV               |

<sup>2</sup> All methods and tools in the "8.1. Engagement of the Vulnerable Groups and Women" section will be applied in these consultations to ensure that women are as much involved in the Project process as men and that their views are shared equally and meaningfully.

| Project stage | Target stakeholders   | Topic(s) of engagement                | Engagement Tool  | Location  | Frequency  | Responsibilities |
|---------------|---|---------------------------------------|--|---|--|------------------|
|               |   |                                       | Poster / Brochures / flyers  |   |  |                  |
|               | <b>Non-governmental Parties</b> <ul style="list-style-type: none"> <li>Press and media;</li> <li>NGOs;</li> <li>Businesses and business organisations;</li> <li>Workers' organisations;</li> </ul>  | <b>Disclosure of the ESIA package</b> | Face to face meetings<br>Focus Group Meetings (women)<br>Project brochure<br>Providind hard copies of the Reports by courier, mail or hand delivery<br>Poster / Brochures / flyers | Affected districts and Provinces<br>Project office as per the request of the PAPs<br>NGO's Project offices as per the request of the stakeholders | Immediately after the reports are approved, before the construction process begins | JV               |
|               | <b>Project Affected People</b> <ul style="list-style-type: none"> <li>PAPs affected by the expropriation (landowners, land users, businesses, physically displaced people)</li> <li>Residents of the settlements in the social area of influence</li> <li>Vulnerable people</li> <li>Women</li> </ul> | <b>Disclosure of the ESIA package</b> | Community meetings<br>Face to face meetings<br>Focus Group Meetings (women)<br>Project brochure<br>Providind hard copies of the Reports by courier, mail or hand delivery          | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas                  | Immediately after the reports are approved, before the construction process begins | JV               |

| Project stage | Target stakeholders  | Topic(s) of engagement  | Engagement Tool   | Location  | Frequency                               | Responsibilities |
|---------------|--|---|---|---|---|------------------|
|               |  |   | Poster / Brochures / flyers   |   |   |                  |
| Construction  | <b>Governmental Parties</b> <ul style="list-style-type: none"> <li>• Municipalities</li> <li>• Governors</li> <li>• District authorities</li> <li>• Academic institutions</li> </ul>                       | Environmental and Social Impacts of the Project and the mitigation measures<br><br>Disclosure of the Stakeholder engagement process and the grievance mechanism process | Stakeholder visits<br>Online meeting<br>In-depth interviews<br>Face to face meetings<br>E-mail address of the Project<br>Phone calls<br>Poster / Brochures / flyers | Directly affected villages<br><br>Key stakeholders in the affected districts<br><br>Key stakeholders in the affected provinces                            | Before construction activities begin    | JV               |
|               | <b>Non-governmental Parties</b> <ul style="list-style-type: none"> <li>• Press and media;</li> <li>• NGOs;</li> <li>• Businesses and business organisations;</li> <li>• Workers' organisations;</li> </ul> | Environmental and Social Impacts of the Project and the mitigation measures<br><br>Disclosure of the Stakeholder engagement process and the grievance mechanism process | Stakeholder visits<br>Online meeting<br>In-depth interviews<br>Face to face meetings<br>E-mail address of the Project<br>Phone calls<br>Poster / Brochures / flyers | Affected districts and Provinces<br><br>Project office as per the request of the PAPs<br><br>NGO's Project offices as per the request of the stakeholders | In each Project phase and when required | JV               |

| Project stage | Target stakeholders  | Topic(s) of engagement   | Engagement Tool   | Location   | Frequency  | Responsibilities |
|---------------|--|--|---|--|--|------------------|
|               | <b>Project Affected Parties and/or PAPs</b> <ul style="list-style-type: none"> <li>Project Affected People</li> <li>Residents of the people in the Project Aol</li> <li>Vulnerable groups and women</li> <li>Local businesses</li> </ul> | To update information on the updated construction status<br>Receive construction-related grievances<br>Environmental and social awareness<br>Construction phase E&S impacts<br>Community health and safety issues<br>Local employment<br>Impact on livelihoods due to construction<br>Construction updates and construction schedule | Community meetings<br>Face to face meetings<br>Focus Group Meetings<br>In-depth interviews<br>Survey<br>Project brochure<br>Poster / Brochures / flyers             | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas | Before construction activities begin<br>Quarterly meetings in all affected settlements<br>With the start of construction activities, | JV               |
|               | <b>Other Interested Parties</b> <ul style="list-style-type: none"> <li>Governmental intuitions</li> <li>National and local media</li> <li>Non-governmental institutions</li> <li>Business organisations</li> </ul>                       | Environmental and social awareness<br>Construction phase E&S impacts<br>Community health and safety issues<br>Local employment<br>Impact on livelihoods due to construction<br>Construction updates and construction schedule  | Stakeholder visits<br>Online meeting<br>In-depth interviews<br>Face to face meetings<br>E-mail address of the Project<br>Phone calls<br>Poster / Brochures / flyers | Stakeholder's work places<br>Project office as per the request of the stakeholders<br>When Project Milestones are achieved       | Biannual meetings<br>When required   | JV               |

| Project stage | Target stakeholders  | Topic(s) of engagement  | Engagement Tool   | Location   | Frequency   | Responsibilities |
|---------------|--|---|---|--|---|------------------|
|               | <b>Project Affected Parties and/or PAPs</b> <ul style="list-style-type: none"> <li>Project Affected People</li> <li>Residents of the people in the Project Aol</li> <li>Vulnerable groups and women</li> <li>Local businesses</li> </ul> | Community health and safety meetings<br>Transit route of heavy vehicles and Project access roads<br>High traffic times and places<br>Restrictions<br>Land crossings and animal crossings<br>Dust, noise, vibration issues   | Community meetings<br>Face to face meetings<br>Project brochure<br>Poster / Brochures / flyers                    | In each directly affected settlement<br>Project office as per the request of the PAPs<br>Mukhtar offices<br>Village public areas | With the start of construction activities,<br>In a meaningful time before the Project construction activities, that may require precautions regarding community health and safety | JV               |
| Operation     | <b>Project Affected Parties</b> <ul style="list-style-type: none"> <li>Project Affected People</li> <li>Residents of the people in the Project Aol</li> <li>Vulnerable groups and women</li> <li>Local businesses</li> </ul>             | The transition process from the construction and operation phase<br>Introduce operation phase CLOs<br>Introduce the roles for the operation phase grievances<br>Operation phase E&S issues, especially community health and safety<br>Information disclosure on national and local media<br>Brochures and information banners at the stations | Community meetings<br>Community meetings<br>Stakeholder visits<br>Project brochure<br>Poster / Brochures / flyers | In each settlement<br>Project office as per the request of the PAPs  | Following the completion of the construction  | TCDD             |
|               | <b>Other Interested Parties (External)</b> <ul style="list-style-type: none"> <li>Governmental and Non-governmental bodies</li> <li>Local businesses</li> <li>Passengers</li> </ul>  | Information disclosure on national and local media<br>Brochures and information banners at the stations   | Project website<br>Social media<br>Newspaper<br>Information sharing on billboards in                              | Institution visit<br>Project office as per the request of the stakeholders<br>When Project Milestones are achieved               | Following the completion of the construction  | TCDD             |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool  | Location | Frequency | Responsibilities |
|---------------|---------------------|------------------------|--|----------|-----------|------------------|
|               |                     |                        | public places or public areas<br>Poster / Brochures / flyers |          |           |                  |

## 9. GRIEVANCE MECHANISM

The Grievance Mechanism (GM) Procedure is one of the basic elements of stakeholder engagement management.

It is one of the most important tools of the stakeholder engagement management process that enables stakeholders to convey their problems, complaints and concerns about the project to the relevant units of the project, and to resolve the complaints submitted with the right methods and in a healthy communication.

The Grievance Mechanism Procedure aims to ensure that problems, complaints or concerns conveyed by stakeholders are dealt with effectively without delay, and to maintain healthy stakeholder engagement based on trust.

The purpose of the grievance mechanism is primarily to respond the complaints and requests of stakeholders. The grievance mechanism should be open, widespread and public. In addition, an effective grievance mechanism is a written resource for stakeholder management. Therefore, it is important to encourage stakeholders to submit their requests and complaints in writing.

Effectiveness of a grievance mechanism as a management procedure depends on the existence of the following key determinants:

- **Clearness and clarity:** Both visual and written sources used in public disclosure should be prepared with clearest form. For instance, addresses and phone numbers of the assigned person should be in visible form for also elderly and handicapped people.
- **Prevalence and accessibility:** All the visual and written material such as brochures, advertisements, posters should be delivered to all settlements in the PSIA.
- **Privacy and respecting to personal rights:** Throughout all the activities, the collected personal data should be protected in accordance with The Personal Data Protection Law No. 6698.

The Grievance Mechanism Procedure covers all internal and external Project stakeholders and all employees within the Firm.

### 9.1. Procedure

The Grievance Mechanism Procedure describes the implementation of the Grievance Mechanism, the grievance management steps, tools, management of the system, and access tools to the Grievance Mechanism.

GM procedure sets standards and principles for establishing safe and sustainable stakeholder communication.

GM procedure contains,

- Contact address of all stakeholders,
- Workflow of the mechanism according to roles and responsibilities defined in the SEP,
- Complaints, problems and concerns received from stakeholders in a completely accessible, free, and secure system where no information is shared against third parties as data.
- The grievance mechanism is also a tool that supports stakeholder engagement process.
- Stakeholder notifications and opinions are received and recorded.
- Communication, interviews and interactions with stakeholders are kept with location and time information.
- Stakeholder meeting reports are prepared and kept.
- Provide a database for monitoring and reporting of the Project.

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## 9.2. Integration of the Grievance Mechanism

The using of the tools and methods identified above in GM Procedure and SEP implementation process will be supported by capacity building activities and training on the tasks and workflow of the Project related experts. Complaints, suggestions, and opinions received through these tools will be evaluated and finalized according to the Grievance Mechanism management process described in this Grievance Mechanism Procedure.

Each written or verbal complaint or suggestion submitted by the Project representatives or experts will be recorded with the contact information of the stakeholder in the main database. All process will be monitored and finalized in this common used database, within the workflow of the grievance mechanism.

Feedback and result notification for complaints received through this channel will be made to the relevant stakeholder.

## 9.3. Internal (Worker) Grievance Management Process

Employees, who may be direct workers or third party/sub-contractor's workers, are encouraged to submit written complaints, comments and concerns. Since the confidentiality of the complainant should be preserved, grievances are collected in grievance boxes which will be placed in areas workers can easily access, including dining rooms. Through these forms, workers will also be able to make anonymous complaints. Information on how to express complaints, opinions and suggestions to workers will be provided during the orientation training process. Written submissions will not be shared and used in any way to force or intimidate those submitting the complaints.

## 9.4. External Grievance Management Process

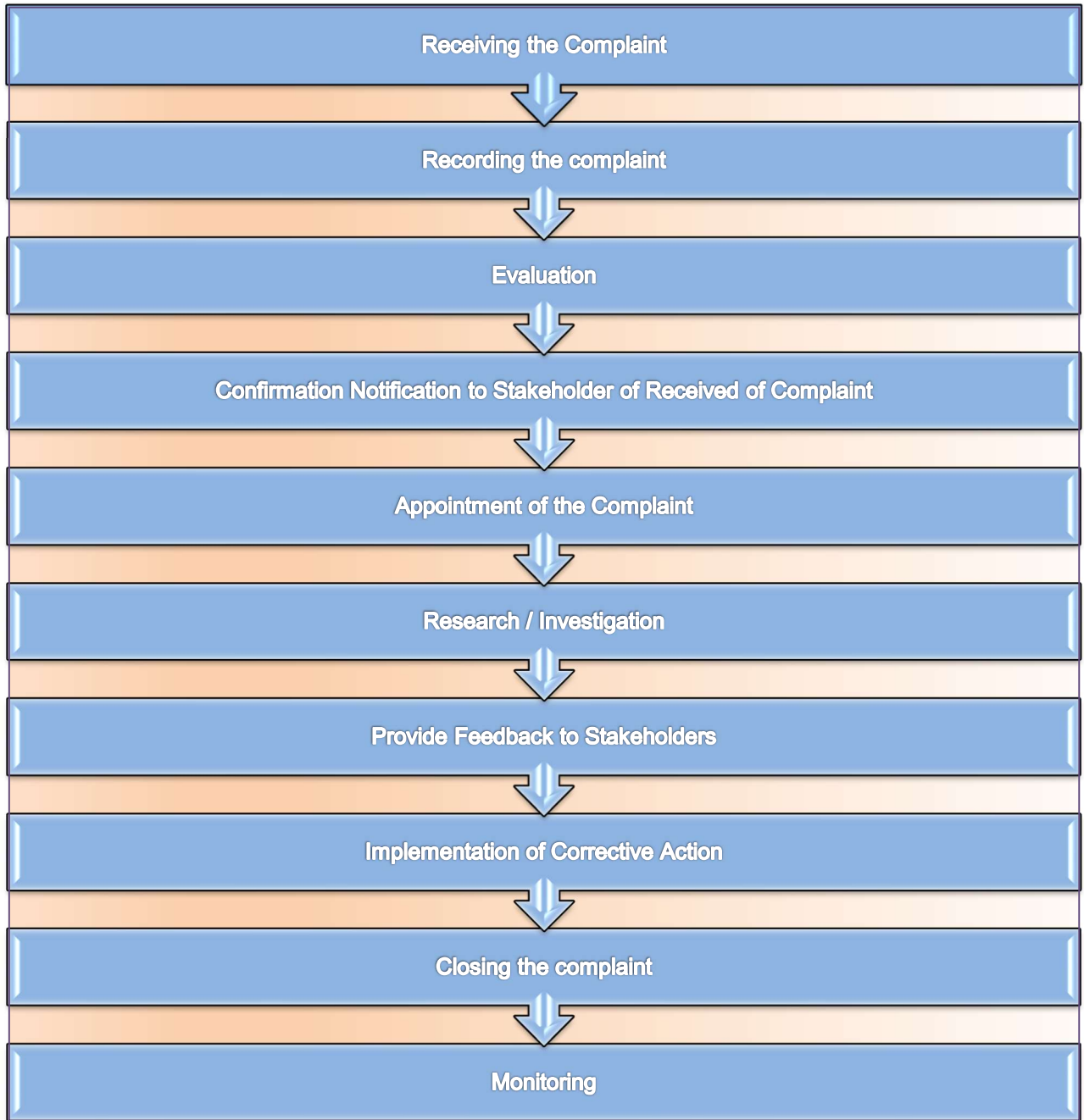
The steps of the grievance management process consist of receiving the grievance, assessing, sending acknowledgment, investigating, feedback to stakeholder, implementing the remediation activities and closeout which process are defined below sections in detail. These steps are also the management process of the internal grievance of the Project.

## 9.5. Flowchart

In order to respond to requests and complaints related to the project, the functioning of the grievance mechanism is illustrated in the following figures.

The functioning of the grievance mechanism is shown in the diagram below.

|  |                                   |  |
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**Figure 3 Grievance Mechanism Workflow Chart**

Details of the running time of the flow chart given above, and the schedule are given in the table below.

**Table 8 Runtime Details and Timeline of Flowchart Chart**

| Workflow steps   |   |
|--|---|
| <b>Receiving the Complaint</b>   | Complaints can be made verbally or in writing using any of the tools described in the section 6. <i>IDENTIFICATION OF COMMUNICATION AND INFORMING CHANNELS</i>  |
| <b>Recording the complaint</b>   | Receiving complaint is recorded within 2 days at the latest.  |
| <b>Evaluation</b>  | The Public Relations and Communications Officer (CLO) or social expert will evaluate and categorize the subject, content of the complaint, which unit it falls under, immediately after the complaint is registered.  |
| <b>Confirmation Notification to Stakeholder of Received of Complaint</b> | The stakeholder will be notified that the grievance has been received and recorded. Feedback will be sent based on the transmission method of the complaint (mail, telephone, etc.).  |
| <b>Appointment of the Complaint</b>                                      | The Public Relations and Communication Officer (CLO) or the social expert will assign the complaint to the relevant unit or person who needs to develop a solution/ corrective action according to the complaint.   |
| <b>Research / Investigation</b>  | The relevant unit, which has taken action, develops solutions and corrective actions within 10 days, obtains the necessary approvals and notifies the Public Relations and Communication Officer (CLO) or social expert of the action result of the complaint evaluation.   |
| <b>Provide Feedback to Stakeholders</b>                                  | Corrective action will be explained to the complainant, consulted and agreed.   |
| <b>Implementation of Corrective Action</b>                               | The existing complaint will be eliminated by applying a solution / corrective action.   |
| <b>Closing the complaint</b>   | It will be determined that the existing problem or complaint has been resolved / approval of the complainant will be obtained, and then the complaint will be closed within 30 days at the latest from the date of registration.  |
| <b>Monitoring</b>  | The source of the complaint<br>The result of corrective action,<br>The effectiveness of the corrective action,<br>Evaluation of residual risks or impacts,<br>Complainant satisfaction will be recorded and the process will be monitored.<br>If it could not be closed or an agreement could not be reached, the evaluation and additional studies planning report will be prepared and submitted to the management. |

The following steps are applied in the complaint resolution process:

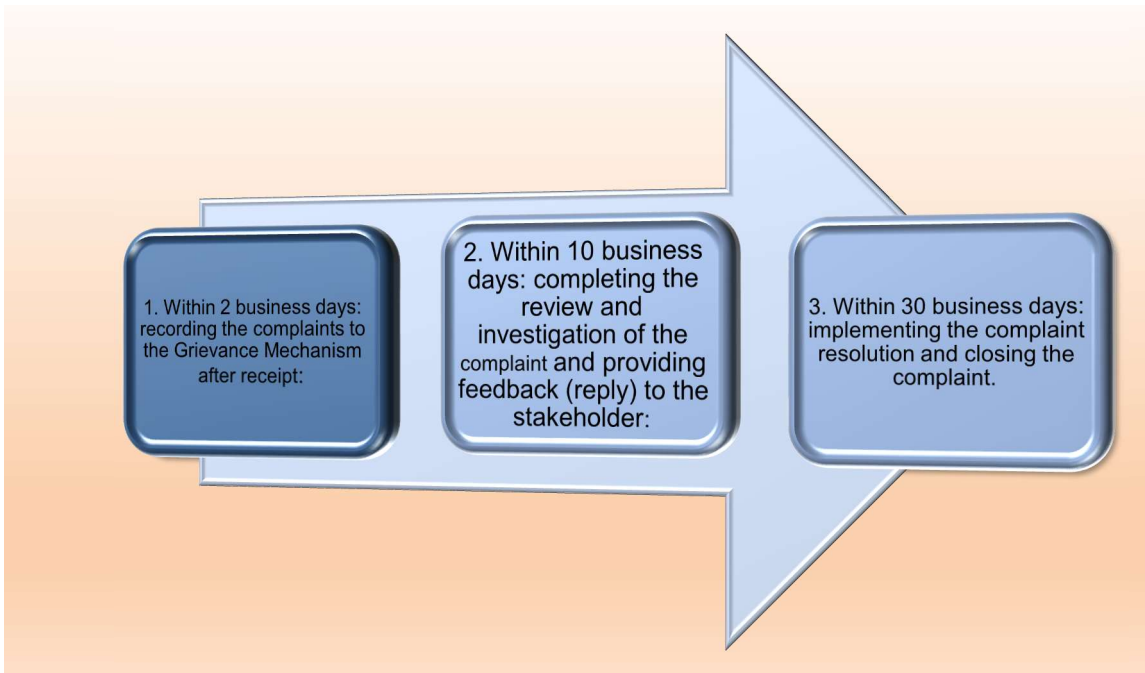
- When a complaint received to the Project by any of the methods and tools described above will be recorded and the complainant will be notified that the record has been received, and the complaint resolution process begins.
- It is aimed to respond to the complaint within 30 days following the notification of the complaint.
- In this process, if there are situations where the 30-day period may be exceeded due to the nature of the corrective action and the timing of the complaint, interim information is given to the complainant.
- The complaint is forwarded to the relevant department.
- At this stage and at all other stages, the protection of the personal information and data of the complainant and the relevant persons is carried out in accordance with the KVKK.

- No information regarding the subject of the complaint, the complainant, and third parties, if any, is shared by violating the privacy and personal space of the persons, and no complaint data is evidence against it.
- The relevant department informs the complaint management unit by determining the reason for the complaint, the corrective action and the application date.
- Depending on the complexity of the complaint, the field senior management, Public Relations Department, relevant department officials and external experts participate in the resolution process when necessary.
- The complaint management officer records the complaint reason, Corrective/Preventive Action, Resolution Timing and responsible employees in the monitoring table (complaint management log/module). If the measure taken is deemed appropriate, the party making the suggestion or complaint is informed and if deemed appropriate, it is implemented.
- Evidence, photographs, supporting documents and statements, if any, etc. added to the complaint records and filed.
- The effectiveness of the corrective action against solving the problem is monitored and the complaint is closed by informing the complainant.
- In cases where the proposed measure is not effective or the complainant is not satisfied with the proposed solution, the complainant has the right to appeal to the Appeal Committee.

One of the standards required for the successful implementation of the grievance mechanism is the completion of the workflow within the defined deadlines.

As seen in the flow chart operation above, in addition to receiving complaints, recording and evaluating them correctly, taking action on time and resolving them without delay was an important component of this process.

The main purpose of GM is not to respond quickly to the complaint or to resolve the complaint quickly. However, complaints that are resolved late or not responded in time may cause new problems. The issue of the complaint may cause more unsolvable issues or the trust problems with the stakeholders.



**Figure 4 Timeline of the GM Process**

|  |                 |  |
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The principles and standards in the implementation process of the steps defined in the workflow chart above are detailed below.

The principles and standards to be followed by all employees, experts and managers who have access to the system in order to standardize the implementation of the GM are explained below within the framework of workflow steps.

**Receiving and assessment of anonymous complaints:** When both external and internal stakeholders experience problems, concerns, or difficulties in providing their contact information, identification information, complaints submitted by stakeholders will be initially evaluated and recorded as anonymous complaints or anonymous suggestions.

Stakeholders can send all their wishes and complaints, without specifying their names, to the wish-complaint boxes placed at specific points for external stakeholders or via hotline.

Grievances are received anonymously and assessed by applying the steps defined in the workflow. Within the scope of the complaint, it will be evaluated through investigation / examination processes and each stage will be recorded in the complaint mechanism system. Third parties will not be informed about complaints that need to be kept confidential.

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

#### 9.6. APPEAL COMMITTEE

If the stakeholders are not satisfied with the complaint resolution, a committee will operate within the scope of the complaint mechanism, where they can appeal the decision regarding their complaints and this objection will be evaluated. Stakeholders can appeal to the Project's independent Appeals Committee with a statement stating that they are appealing the decision on their grievances.

The purpose of the Appeals Committee is as follows;

- The Appeals Committee is to create an alternative tool for re-evaluation of unresolved complaints in case the complaining stakeholder is not satisfied with the suggested corrective action.

- The Appeals Committee examines all unresolved complaints, with the exception of cases subject to law. In this context, the Appeals Committee may consider the following issues:

- Damages to the environment caused by project activities,
- Damages to public assets and infrastructure resulting from project activities,
- Damages to lands, crops, houses caused by project activities,
- Impacts on livelihoods resulting from project activities.

The Appeals Committee will be composed of independent experts who have no role in the Project activity as it should be independent. Experts working in universities, businesses and NGOs in the project area can be defined as suitable experts to form the Appeals Committee.

|  |                                   |  |
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The Appeals Committee independently evaluates all the complaints and then presents the decisions and solution proposals to the relevant parties together with their justifications.

If the resolutions proposed by the Committee cannot be agreed upon, the stakeholders may renegotiate the issue or have the right to take the issue to court.

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## 10. GRIEVANCE FORM

The Client will have a communication tools such as public relation office, Project website. In addition to this, grievances can be filed through the interviews by face-to-face, on-line or telephone. Grievance forms will also be found in easily accessible places such as common usage areas in the settlements, public relation office and Project management office. Templates of complaint and complaint closing forms given in Annex-1 and Annex-2 are given. The Complaint Notification Form will be kept in print where these boxes are located and will be used for the submission of both anonymous and public complaints.

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## 11. TRAINING

Doğuş-Çelikler-Özkar Joint Venture is primarily responsible for the implementation and monitored until the SEP during the Project lifecycle.

The responsibility of the Project management team is to provide the necessary resources for the implementation of the SEP and monitor the implementation of the plan, the management of the request/complaint mechanism, and the evaluation of the submitted feedback. In addition, the subject of the complaint should work with the relevant units to gather accurate information about the problem and ensure that the result reached is conveyed to the senior management and the solution produced to the complainant.

Administrative Affairs Unit and Human Resources Unit will play a leading role in communication with stakeholders. In order for the SEP plan and especially the grievance mechanism to function correctly and in line with the targets, all Project units must be informed of this system.

Internal key units such as the Project Environmental Unit, OHS Unit, and Management Unit, to which direct action will be taken, should be provided with user-level training on the GM procedure and the use of the grievance mechanism. In addition, all employees and sub-contractors of the Project will be informed about SEP and GM through announcements and meetings.

## 12. MONITORING AND REPORTING

This plan needs to be internally audited, reviewed and updated every 6 months in the construction period. In addition, external audits every 1 year during the construction period. During the review process, in any change made in the Stakeholder Engagement Plan, the reason for this change should be documented and presented and should be up to date.

Monitoring process of the SEP and related KPIs of the activities will be included in the monitoring plan of the Project.

Monthly, quarterly or annually monitoring reports will be prepared to assess the effectiveness of the GM.

A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP. The table below summarizes the KPIs and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies. KPI and targets will be updated following the finalize the stakeholder programme.

**Table 9 KPIs of the SEP**

| KPI   | Target   | Verification Measure |
|---|--|----------------------|
| Registration of stakeholder engagement  | Target of 100%   | Database             |
| Number of community grievance records   | Total number reduced year on year                          | GM database          |
| Reporting back to stakeholders on implementation of the Grievance Procedure   | Target of 100%   | Reporting            |
| <ul style="list-style-type: none"> <li>– Consultation Records</li> <li>– number of the meetings held,</li> <li>– number of the participants attended the public consultation meetings,</li> <li>– number of grievances raised per settlement</li> </ul> | Delivery of regular reports on the consultation activities | Reporting            |

|  |                                   |  |
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| KPI   | Target  | Verification Measure   |
|---|---|--|
| <ul style="list-style-type: none"> <li>- types of grievances (complaint/request)</li> <li>- timeline required to solve grievances - status of grievances (open/closed)</li> </ul> |   |  |
| Internal auditing Grievance Mechanism to ensure that it is being implemented and grievances are being adequately addressed  | Target of 90% of grievances closed out to satisfaction of complainant within the defined time/ schedule | Audit report   |
| Disclosure of Project's SEP   | For all affected settlements  | Annual Report<br>Number of the meeting<br>Number of the participants<br>GM and Meeting reports |

## ANNEX-1

## COMPLAINT REGISTRATION DOCUMENT

|  |  |   |
|--|--|---|
| <b>Şikâyetin Alındığı Yer/</b><br>Location Of Complaints Received  |  | <b>Tarih/</b><br>Date   |
| <b>Alan Yetkilinin Adı/</b><br>Name Of Person In Charge  |  | <b>Şikâyet Kayıt No/</b><br>Complaint Register Number                             |
| <b>Şikâyete Konu Alanın Koordinatları/</b><br>Coordinates Of The Area Subject To<br>Complaint  |  |   |
| <b>ŞİKÂYET SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO</b><br>Şikâyet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. / The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond. |  |   |
| <b>Ad Soyad/</b><br>Name Surname   |  | <b>Şikâyetin Geliş Yolu /</b><br>Form of Complaint:                               |
| <b>TC Kimlik No/</b><br>Identification Number  |  | <b>Telefon- Ücretsiz hat /</b><br>Phone –Free phone line <input type="checkbox"/> |
| <b>Telefon/ E-Posta</b><br>Telephone/ E-mail   |  | <b>İstişare Toplantısı/</b><br>Consultation meeting <input type="checkbox"/>      |
| <b>Mahalle-Köy-İlçe-İl/</b><br>Neighborhood-Village –District -<br>Province  |  | <b>Dilekçe /</b> Petition <input type="checkbox"/>                                |
| <b>ŞİKÂYET DETAYLARI / DETAILS OF COMPLAINT</b>  |  |   |
| <b>Şikâyet Konusu /</b><br>Complaint   |  |   |
| <b>Şikâyet sahibi tarafından talep edilen çözüm /</b><br>Solution requested by the Complainant   |  |   |
| <b>Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası / Şikâyet Sahibinin Ad Soyad ve İmzası /</b> Name Surname and<br>Signature of the Registerer Name Surname and Signature of Complainant  |  |   |

ANNEX-2

COMPLAINT-WISH NOTIFICATION FORM FOR THE WISH-COMPLAINT BOXES

|  |  |
|--|--|
| <b>Şikâyet Kapatma Numarası:</b><br>Grievance Closure No:  |  |
| <b>Alınması Gereken Acil Önlemleri Tanımlayın:</b><br>Identify the urgent actions  |  |
| <b>Alınması Gereken Uzun Vadeli Önlemleri Tanımlayın (Gerekli ise):</b><br>Identify the long term actions (if necessary) |  |
| <b>Tazminat Talebi Bulunuyor Mu?</b><br>Is there a claim for compensation?   | <input type="checkbox"/> Evet/Yes <input type="checkbox"/> Hayır/No  |
| <b>DÜZELTİCİ FAALİYETİN KONTROLÜ VE KARARI / CONTROL AND DECISION OF CORRECTIVE ACTION</b>                               |  |
| <b>Düzeltilici Faaliyetin Aşamaları</b><br>Stages of Corrective Action   | <b>Verilen Sürenin Sona Erdiği Tarih ve Yetkili Kuruluşlar</b><br>Date of Expiration of the Given Period and Authorized Institutions |
| 1.   |  |
| 2.   |  |
| 3.   |  |
| 4.   |  |
| 5.   |  |
| 6.   |  |
| 7.   |  |
| 8.   |  |
| 9.   |  |
| 10.  |  |