



REPORT

Kınalı Malkara Motorway Project

Stakeholder Engagement Plan

Submitted to:

ÇOK A.Ş.

1915 Çanakkale Ana Kontrol Merkezi Gazi Süleyman Paşa Mahallesi Dumlupınar Caddesi No: 6 17800 Lapseki, Çanakkale

Submitted by:

WSP Danışmanlık ve Mühendislik Ltd. Şti.

Hollanda Cad. 691. Sok. Vadi Sitesi No:4, Yıldız 06550 Ankara, Türkiye

+90 312 4410031

22519766_final draft

March, 2025



Distribution List

1 copy: Lenders

1 copy: ÇOK A.Ş.

1 copy: WSP Danışmanlık ve Mühendislik Ltd. Şti.

Record of Issue

| Version | Date Issued | Method of Delivery |
|-------------|-------------|-------------------------|
| v0 | 18.08.2024 | Word and pdf via e-mail |
| v1 | 05.09.2024 | Word and pdf via e-mail |
| v2 | 28.11.2024 | Word and pdf via e-mail |
| v3 | 10.01.2025 | Word and pdf via e-mail |
| Final Draft | March 2025 | Word and pdf via e-mail |

Table of Contents

| | |
|---|-----------|
| 1.0 INTRODUCTION | 1 |
| 1.1 Purpose and Scope of the Stakeholder Engagement Plan | 1 |
| 2.0 PROJECT DESCRIPTION | 2 |
| 2.1 Project Overview | 2 |
| 2.2 Project Schedule | 5 |
| 2.3 Project Parties | 5 |
| 3.0 REGULATORY REQUIREMENTS | 6 |
| 3.1 Turkish Requirements for Stakeholder Engagement and Public Consultation | 6 |
| 3.1.1 The Constitution of The Republic of Türkiye | 6 |
| 3.1.2 Other main national laws/regulations | 6 |
| 3.2 International Standards | 7 |
| 3.2.1 IFC Performance Standards | 7 |
| 3.2.2 Equator Principles (EP) | 8 |
| 4.0 STAKEHOLDER IDENTIFICATION | 10 |
| 4.1 Project's Stakeholders | 10 |
| 4.2 Identification of Vulnerable Groups | 18 |
| 5.0 STAKEHOLDER ENGAGEMENT TOOLS | 23 |
| 6.0 PREVIOUS STAKEHOLDER ENGEMENT AND CONSULTATION ACTIVITIES | 25 |
| 6.1 Stakeholder Engagement Activities for EIA Phase | 25 |
| 6.2 Stakeholder Engagement Activities for Scoping and ESIA Phase | 25 |
| 6.2.1 Area of Influence | 25 |
| 6.2.2 Field Visits | 27 |
| 7.0 FUTURE STAKEHOLDER ENGAGEMENT AND CONSULTATION ACTIVITIES | 28 |
| 7.1 Stakeholder Engagement Activities for Land Acquisition | 28 |
| 7.2 Stakeholder Engagement Activities for General Information Disclosure | 28 |
| 8.0 STAKEHOLDER ENGAGEMENT PROGRAMME | 28 |
| 8.1 Proposed Programme for Project Phases | 28 |
| 8.2 Proposed Strategy for the Information Disclosure | 36 |
| 8.3 Proposed Strategy for Consultation | 36 |

| | |
|--|-----------|
| 9.0 GRIEVANCE MECHANISM | 36 |
| 9.1 Governmental Grievance Mechanism- all stakeholders | 38 |
| 9.2 Internal Grievance Mechanism – for Workers | 38 |
| 9.3 External Grievance Mechanism – for communities | 38 |
| 9.4 Receiving and Assessment of Anonymous Grievances | 40 |
| 10.0 MONITORING | 40 |
| 11.0 REPORTING | 42 |
| 12.0 ROLES AND RESPONSIBILITIES | 43 |
| 13.0 LIABILITIES | 46 |
| 14.0 REFERENCES | 46 |

TABLES

| | |
|---|----|
| Table 1: Project Parties | 5 |
| Table 2: Project's Stakeholder Classification | 12 |
| Table 3: Vulnerable Groups in the Neighbourhoods | 20 |
| Table 4: Stakeholder Engagement Tools | 23 |
| Table 5: Social Area of Influence of the Project | 26 |
| Table 6: Stakeholder Engagement Programme | 30 |
| Table 7: Key Performance Indicators (KPIs) and monitoring actions – Stakeholder Engagement..... | 41 |
| Table 8: Reporting & Monitoring Time Frame | 43 |
| Table 9: Roles and Responsibilities | 43 |

FIGURES

| | |
|--|----|
| Figure 1: Overview of the Kinalı-Balıkesir Motorway and Kinalı-Malkara Section | 3 |
| Figure 2: Project Layout and Nearest Settlements..... | 4 |
| Figure 3: Grievance Management Workflow | 40 |

APPENDICES

APPENDIX A

Stakeholder Engagement Activity Registration Template

APPENDIX B

ESIA Feedback Form

APPENDIX C

Sample Internal Grievance Form

APPENDIX D

Sample External Grievance Form

APPENDIX E

Grievance Closure Form

APPENDIX F

Grievance Log / Database

DEFINITIONS

Environmental and Social Impact Assessment: The Environmental and Social Impact Assessment (ESIA) process is a way to identify, predict and assess the type and scale of potential environmental and social (“E&S”) risks, impacts, and opportunities to benefit conservation associated with any business activities or projects.

Grievance Mechanism: IFC Good Practice Note defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company’s operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: 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 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 organisations and groups with special interests, the academic community, or other businesses.

Public Consultation: As referred to in this Good Practice Manual, public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups, and organisations with a stake in the Project. This involvement will increase a Project’s long-term viability and benefit locally affected people and other stakeholders.

Stakeholder Engagement Plan: Stakeholder Engagement Plan (“SEP”) is a guidance for stakeholder consultations and communications during the period of the main ESIA studies and other aspects of the project analysis and design. SEP is a living document should be updated toward the end of the ESIA studies to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

Vulnerable People: Vulnerability status may stem from an individual’s or group’s race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

ABBREVIATIONS

| | |
|--------------------|---|
| the Project | 105.3 km Kınalı-Malkara Motorway Project |
| ÇOK A.Ş. | Çanakkale Otoyol ve Köprü İnşaat Yatırım ve İşletme A.Ş. |
| WSP Türkiye or WSP | WSP Danışmanlık ve Mühendislik Ltd. Şti. |
| Aoi | Area of Influence |
| BOT | Build-operate-transfer |
| CIMER | Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi) |
| CLO | Community Liaison Officer |
| EIA | Environmental Impact Assessment |
| EPC | Engineering, Procurement and Construction |
| EPFI | Equator Principles Financial Institutions |
| EPs | Equator Principles |
| ESIA | Environmental and Social Impact Assessment |
| ESMS | Environmental and Social Management System |
| GBVH | Gender-Based Violence and Harassment |
| ICP | Informed Consultation and Participation |
| IFC | International Finance Corporation |
| KGM | General Directorate of Highways (Karayolları Genel Müdürlüğü) |
| KPIs | Key Performance Indicators |
| MoEUCC | Ministry of Environment, Urbanization and Climate Change |
| MoTI | Ministry of Transport and Infrastructure |
| NGOs | Non-governmental organisations |
| PAP | Project Affected People |
| PSs | Performance Standards |
| RAP | Resettlement Action Plan |
| RF | Resettlement Framework |
| SEP | Stakeholder Engagement Plan |
| SPV | Special Purpose Vehicle |

1.0 INTRODUCTION

This Stakeholder Engagement Plan is prepared as part of the Environmental and Social Impact Assessment (ESIA) for 105.3 km Kınalı-Malkara Motorway Project (herein after “the Project”), by WSP Danışmanlık ve Mühendislik Ltd. Şti. (herein after “WSP”) on behalf of Çanakkale Otoyol ve Köprü İnşaat Yatırım ve İşletme A.Ş. (“ÇOK A.Ş.”) which is Türkiye based company (Special Purpose Vehicle – SPV) for implementing the Project in compliance with the national and international requirements.

The Project will be realized with build-operate-transfer (BOT) model. ÇOK A.Ş. will appoint an engineering, procurement, and construction (EPC) Contractor for the main design and construction works of the Project. ÇOK A.Ş. will perform the works via several subcontractors on different sections of the Project. For the future operations and maintenance of the Motorway, ÇOK A.Ş. will appoint a contractor in due course (referred to herein as the “Operation and Maintenance (O&M) Contractor”) or ÇOK A.Ş. will manage the Project directly.

The Project is 105.3 km in length and is part of the larger 324 km Kınalı – Tekirdağ – Çanakkale – Savaştepe Motorway (herein after “Kınalı-Balıkesir Motorway”). In conformance with national regulatory requirements, an Environmental Impact Assessment (EIA) for the entire 324 km Kınalı-Balıkesir Motorway was completed in November 2016 and “EIA Positive Decision” issued by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on 23 November 2016.

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’s outcomes. During the execution of the Project, SEP will be implemented in accordance with the requirements of Turkish national laws/regulations, International Finance Corporation (IFC) Performance Standards (PSs) and Equator Principles (EPs) on Social and Environmental Sustainability.

This SEP identifies the Project stakeholders, target groups and the specific engagement activities required for each group of stakeholders identified in this report.

The SEP is considered as a living document which will be updated on a regular basis to meet the future needs of the Project to comply with international standards (detailed in Section 3).

The Project will be committed to the following principles based on the international best practices to obtain effective stakeholder engagement as:

- Commitment to understand, engage and identify the community at the early stages of the Project,
- Integrity in a way that encourages mutual respect and trust,
- Respect the rights, cultural beliefs, values, and interests of stakeholders and affected communities,
- Transparency in community concerns and respond in a timely, open, and effective manner,
- Establishing an inclusive engagement process by ensuring the meaningful participation of vulnerable groups in the Project affected settlements,
- Ensuring equal participation in all stakeholder engagement processes with a gender-sensitive approach, and,
- Establishment of a Project-specific grievance mechanism (both internal and external) to ensure a technically and culturally appropriate approach for engagement with all stakeholders.

1.1 Purpose and Scope of the Stakeholder Engagement Plan

The purpose of this SEP is to ensure that the Project stakeholders, including the Project affected people and other interested stakeholders, are informed about the Project in a timely manner with consistent,

comprehensive, relevant, accessible, and transparent information. The SEP ensures a participatory approach, and the implementation of the SEP is intended to elicit opinions and concerns regarding the Project and its impacts.

The primary objectives of this document are to:

- Identify stakeholders,
- Outline processes for informing stakeholders about the Project,
- Review current stakeholder engagement activities and outline planned future activities,
- Set up a grievance mechanism, including a process for addressing feedback and concerns,
- Define roles and responsibilities related to engagement activities, and
- Establish a framework for monitoring engagement activities.

2.0 PROJECT DESCRIPTION

2.1 Project Overview

The Kınalı-Tekirdağ-Çanakkale-Savaştepe Motorway (Kınalı-Balıkesir motorway) is one of the components of the broader Marmara Motorway Ring Project announced by the Turkish Government in 2015, which includes İstanbul-İzmir Motorway, the Northern Marmara Motorway, and the Kınalı-Tekirdağ-Çanakkale-Savaştepe Motorway.

The total length of the Kınalı-Balıkesir Motorway is 324.441 km, and the National Environmental Impact Assessment ("EIA") Positive Decision for the Kınalı-Balıkesir Motorway has obtained from MoEUCC on 23.11.2016.

Within the scope of the national EIA report, the Kınalı-Balıkesir Motorway route was divided into two sections considering the Project design technique and regional divisions. The route of Kınalı-Balıkesir Motorway has been divided into further sections since sub divided sections has been assigned to be constructed by different tenders.

According to the national EIA report (2016), the Kınalı-Balıkesir Motorway corridor starts from the Kınalı-1 Interchange area of the existing O-3 (TEM) İstanbul – Edirne Motorway. Then, it continues westward by Marmara Ereğlisi and Çorlu District. It continues from the north of Tekirdağ City Centre and passes through the south of Malkara settlement and north of Şarköy District. Then it turns southwest and reaches the Gelibolu Peninsula from the east of the Evreşe District. Motorway passing through the north of the Gelibolu settlement, reaches the 1915Çanakkale Bridge, which is in the area between Sütluçe and Şekerkaya.

Following the completion of the 1915Çanakkale Bridge, the route veers southeast, bypassing Lapseki District to the south, and proceeds to Çan District. The Motorway skirts the southern edge of Çan District before bending northward around Yenice District, traversing its northern part. Beyond Yenice District, the Motorway shifts southeast towards Balya District. Upon crossing south of Balya District, it redirects towards Balıkesir Province, eventually linking with the Gebze-İzmir Motorway on the western side of Balıkesir Province.

To date, the construction of "Malkara-Çanakkale Section", including the 1915Çanakkale Bridge of the Motorway has been completed and is currently in operation. "Çanakkale-Savaştepe Section" of the Kınalı-Balıkesir Motorway have not been tendered yet. The overview of the Kınalı-Balıkesir Motorway including the Project (Kınalı-Malkara Motorway Section) is shown in Figure 1. The Project layout with nearest settlements is presented in Figure 2.

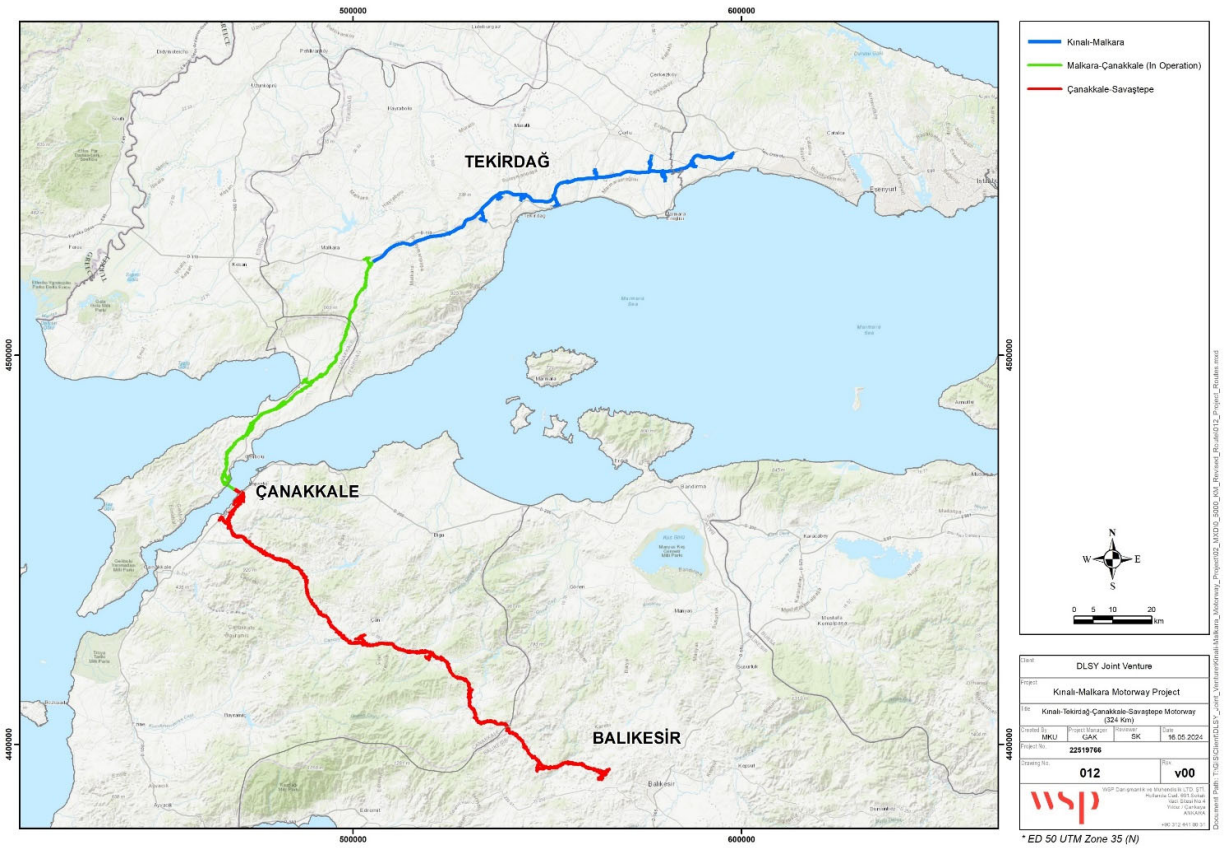


Figure 1: Overview of the Kınalı-Balıkesir Motorway and Kınalı-Malkara Section

2.2 Project Schedule

The design lifetime of the Project has been planned as 100 years. The concession period of the Project has not yet been determined. The total duration of the Project's construction phase will be 45 months. This includes eight months allocated for pre-construction activities, 34 months for the actual construction, and an additional three months for testing and commissioning works.

The current status of the Project schedule are as follows:

- Construction activities have not yet commenced,
- Although the expropriation plans between Project KM 70 and 105 has been completed as of the date of this version of SEP, the land acquisition and expropriation activities have not been initiated yet. The expropriation process will be carried out by General Directorate of Highways ("KGM"),

2.3 Project Parties

The owner of the Kınalı-Malkara Motorway Project is the Republic of Türkiye Ministry of Transport and Infrastructure (MoTI), General Directorate of Highways (KGM). ÇOK A.Ş. will appoint an EPC contractor to implement the main design and construction works of the Project. The Project will be realized with BOT model. A part of the 100-year Project life will be operated by ÇOK A.Ş within the scope of the BOT contract, or an O&M contractor will be appointed. The duration of the operation period will be clarified later in consultation with the MoTI and Undersecretariat of Treasury. An operation and maintenance programme will be developed and implemented by ÇOK A.Ş. as per the BOT Contract to assure that specified conditions are met upon the hand-back of the motorway to KGM at the end of the Concession Period.

Table 1: Project Parties

| Parties | Responsible Party | Main Role & Responsibilities |
|---|---|---|
| Project Owner | General Directorate of Highways (KGM) | Assigning an "Appointed Company" for the Project under the BOT Contract Carrying Expropriation and Land acquisition processes Supervision of the Project Approval of the design of the Project |
| Special Purpose Vehicle | ÇOK A.Ş. | Borrower of the Project finance Appointed Company for the Project Development of Project design Construction of the Project Operation of the Project |
| EPC Contractor | An engineering, procurement, and construction company to be appointed by ÇOK A.Ş. | Development of Project design Conducting pre-construction activities Construction of the Project |
| ESIA Consultant (Independent national and international environmental and social consulting firm) | WSP Türkiye | Development of ESIA Report and other deliverables as specified in the relevant sections of this report |

3.0 REGULATORY REQUIREMENTS

3.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

3.1.1 The Constitution of The Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment: ARTICLE 56. 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.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

3.1.2 Other main national laws/regulations

I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the

Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

V. Environmental Law

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens, and the state bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (29.07.2022, OG No. 31907).

The projects requiring an EIA Report, the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29th, 2022.

The relevant requirements regarding the EIA process have been disclosed to the public in accordance with the Environmental Impact Assessment Regulation of the MoEUCC of the Republic of Turkey.

Project’s status according to Environmental Impact Assessment Regulation

In comply with national regulatory requirements, an Environmental Impact Assessment (EIA) for the entire 324 km long for Kinalı-Balıkesir Motorway was completed in November 2016 and “EIA Positive Decision” issued by the MoEUCC on 23 November 2016.

3.2 International Standards

3.2.1 IFC Performance Standards

IFC’s Sustainability Framework articulates 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:

- 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.

3.2.2 Equator Principles (EP)

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. The list of the EPs presented below:

- Principle 1: Review and Categorisation.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.
- Principle 4: Environmental and Social Management System and EP 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 ÇOK A.Ş./EPC Contractor 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".¹

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".

The IFC defines stakeholders as individuals or groups who are directly or indirectly affected by a project, as well as those who are not directly affected by a project but have an interest in it and the ability to influence its outcome, either positively or negatively. They may include locally affected communities or individuals and their formal and informal representatives, national or local administrations, politicians, religious leaders and special interest groups, academia or businesses, and direct and indirect workers.

Stakeholder engagement encompasses a range of activities throughout a project's life, divided into key components:

- **Stakeholder Identification and Analysis:** Identify and prioritize stakeholders by understanding their interests and concerns.
- **Information Disclosure:** Share relevant information with stakeholders early and consistently, ensuring it's accessible and meaningful.
- **Stakeholder Consultation:** Plan and conduct inclusive consultations, document the process, and communicate outcomes.
- **Negotiation and Partnerships:** Engage in good-faith negotiations on complex issues and form partnerships to add value to mitigation efforts or project benefits.
- **Grievance Management:** Set up accessible systems for stakeholders to raise concerns and grievances throughout the project.

¹ <https://equator-principles.com/>

- **Stakeholder Involvement in Monitoring:** Involve stakeholders in monitoring the project's impacts, mitigation measures, and benefits, while also including external monitors for added transparency.
- **Reporting to Stakeholders:** Provide regular updates on the project's environmental, social, and economic performance.
- **Management Functions:** Ensure the company has the capacity to manage stakeholder engagement, track commitments, and report progress.

4.0 STAKEHOLDER IDENTIFICATION

The first step in stakeholder engagement is identifying who the project stakeholders are, along with their main groups and subgroups. Following this, stakeholder analysis takes a deeper dive into understanding their interests, how they may be impacted, and the level of influence they might have on the project.

The overall objective of stakeholder identification is to identify and prioritise project stakeholders for informed consultation and participation. Stakeholder identification is a continuous process. The list of identified stakeholders should be evaluated and updated according to the results of the grievance mechanism and for the different phases of the project and project updates.

Potential stakeholders will be categorised and prioritised on the basis of stakeholder status, level of interest or ability to influence.

Community Liaison Officers (CLOs), who serve as key points of contact between the project and its stakeholders, will be appointed to manage communication, gather stakeholder feedback, and oversee the grievance mechanism. To support gender-sensitive engagement, female CLOs will be specifically appointed, ensuring inclusive representation and accessibility for all stakeholder groups.

4.1 Project's Stakeholders

In general, stakeholders can be categorised into two groups:

- Primary stakeholders are the individuals and communities directly affected by the Project's impacts; and
- Secondary stakeholders are those who have an interest or influence (negative or positive) on the Project.

Primary stakeholders include:

- International bodies and organisations (e.g. international investors, international financial institutions, international non-governmental organisations ("NGOs"),
- National government agencies,
- Regional government agencies/authorities,
- Local authorities,
- National and local NGOs and organisations,
- Trade Unions and Associations,
- Motorway users,
- Education and training institutions (e.g. universities, colleges, think tanks),
- Industry (e.g. construction and infrastructure trade associations),
- Project Affected People (PAPs),

- Mukhtars/local authorities of Project-affected settlements,
- Local community members,
- Landowners and land users (formal and informal land users), and
- Affected businesses and employees of businesses
- Vulnerable groups: the elderly, the disabled, female-headed households, landless households and/or individuals, ethnic minorities, immigrants, refugees, etc.
- Project workers and workers' representatives,
- Third party suppliers of goods and services, contractors and their subcontractors,
- Social services (e.g. hospitals, local schools and other local community services), and
- Media.

Affected settlement of the Project described by deciding Area of Influence (Aol). From a social viewpoint, the Aol perspective is also influenced by direct and induced socio-economic influences (including resettlement, economic displacement, livelihood, health, and safety aspects), spatial implications, intrusion impacts and stakeholder typology. The detailed list of the settlement in Aol presented in Table 5.

Table 2 given below represents the identified stakeholders in accordance with the stakeholder identification approach.

Table 2: Project's Stakeholder Classification

| Type | Stakeholders | Affected | | Interested/ influenced |
|--|---|----------|----------|------------------------|
| | | Direct | Indirect | |
| Internal Stakeholders | | | | |
| Project Owner | General Directorate of Highways (“KGM”) | X | | |
| Project Company | ÇOK A.Ş. | X | | |
| EPC Contactor | An engineering, procurement, and construction company to be appointed by ÇOK A.Ş. | X | | |
| Subcontractor | Subcontractors will be determined later by ÇOK A.Ş. | X | | |
| Employees | Project employees | X | | |
| Consultants | Project consultants -to be determined. | X | | |
| External Stakeholders | | | | |
| International bodies and organizations | Lenders, potential lenders | | | X |
| National Governmental Authorities | Ministry of Environment, Urbanization and Climate Change Ministry of Transport Ministry of Culture and Tourism Ministry of Energy and Natural Resources Ministry of Food, Agriculture and Livestock Ministry of Forestry and Water Affairs Ministry of Interior Ministry of Family, Labour and Social Services Ministry of National Defense Turkish Armed Forces | | | X |
| Regional/Local Authorities | Istanbul Governorship Tekirdağ Governorate Silivri District Governorate Marmaraeğlisi District Governorate | X | | |

| Type | Stakeholders | Affected | | Interested/ influenced |
|--|--|----------|----------|------------------------|
| | | Direct | Indirect | |
| | Çorlu District Governorate Süleymanpaşa District Governorate Malkara District Governorate Istanbul and Tekirdağ provincial directorates of central government institutions Silivri, Marmaraereğlisi, Süleymanpaşa district directorates of central government institutions Istanbul Development Agency Trakya Development Agency Istanbul and Tekirdağ Metropolitan Municipality Silivri, Marmaraereğlisi, Çorlu, Süleymanpaşa district municipalities Mukhtars of the affected settlements (villages and neighbourhoods) | | | |
| National and Local NGOs and organizations | Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Turkish Yol-İş Union Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) WWF Türkiye Women-specific associations İŞKUR | | | X |

| Type | Stakeholders | Affected | | Interested/ influenced |
|--|---|----------|----------|------------------------|
| | | Direct | Indirect | |
| Trade unions and associations | Turkish Drivers and Automobile Association Çerkezköy Chamber of Commerce and Industry Tekirdağ Chamber of Commerce and Industry Malkara Chamber of Commerce and Industry Çorlu Chamber of Commerce and Industry Süleymanpaşa Chamber of Agriculture Malkara Chamber of Agriculture Silivri Chamber of Agriculture Silivri United Chamber of Artisans and Craftsmen Silivri Drivers And Automobile Association Tekirdağ Drivers and Automobile Association Malkara Drivers And Automobile Association Marmaraereğlisi Chamber of Tradesmen and Craftsmen | X | | |
| Users of the Motorway | | X | | |
| Education and training institutions | Tekirdağ Namık Kemal University İstanbul Rumeli University Tekirdağ Namık Kemal University İstanbul Rumeli University Silivri Vocational Training Centre Silivri Justice Vocational Education Centre | | | X |
| Social services | Çorlu State Hospital Malkara State Hospital Marmara Ereğlisi State Hospital Muratlı State Hospital | | X | |
| Industrial sectors | Çorlu Leather Organized Industrial Zone Marmaraereğlisi OIZ Directorate (MARSAB) Malkara Organized Industrial Zone VELIMESE OSB | X | | |

| Type | | Stakeholders | Affected | | Interested/ influenced |
|-------------|--|---|----------|----------|------------------------|
| | | | Direct | Indirect | |
| | | Çorlu 1 Organized Industrial Zone Directorate Tekirdağ Corlu Airport Operations Directorate BOTAŞ Silivri BOTAŞ LNG Directorate | | | |
| PAPs | Affected settlements, Local community members Mukhtars Vulnerable groups Landowners Formal Land Users Informal Land Users Project affected businesses Employees of businesses | Alipaşa Çanta Balaban Çeltik Danamandır Değirmenköy (Fevzipaşa) Gümüsyaka Semizkuşlar Çanta Sancaktepe Yolçatı Maksutlu Seymen Şahbaz Türkgücü Yenice Aydoğdu Çiftlikönü (Gündoğdu) Gazioğlu Güveçli Husunlu İnecik İstiklal (Eskicami) Karaevli Karahisarlı Kayı Kınıklar Köseilyas Mahramlı | X | | |

| Type | | Stakeholders | Affected | | Interested/ influenced |
|--------------|--|--|----------|----------|------------------------|
| | | | Direct | Indirect | |
| | | Nusratfakı Nusratlı Osmanlı Seymenli Yağcı Zafer Çeşmeli Türkmenli Yakuplu Ahievren Dereköy Hereke Yenice Yukarısirt Tepeköy | | | |
| Media | | Avrupa Newspaper Avrupa Yakası Newspaper Çerkezköy Bakış Newspaper Çerkezköy Haber Newspaper Çorlu Newspaper Devrim Newspaper Haber Trak Newspaper Hayrabolu Sesi Newspaper Marmara Haber Newspaper Medya Batı Newspaper Saray Gözlem Newspaper Saygın Malkara Newspaper Tekirdağ Şafak Newspaper Tekirdağ Yeni İnan Newspaper Trakya Newspaper Trakya Demokrat Newspaper | | | X |

| Type | Stakeholders | Affected | | Interested/ influenced |
|------|---|----------|----------|------------------------|
| | | Direct | Indirect | |
| | Trakya Flaş Haber Newspaper Ayrıntılı Haber Newspaper Bizim Anadolu Newspaper Dokuz Sütun Newspaper Damga Newspaper Günboyu Newspaper Hürhaber Newspaper Hürses Newspaper İstanbul Newspaper İstiklal Newspaper İttifak Newspaper Önce Vatan Newspaper Son An Newspaper Son Saat Newspaper Tünaydın Newspaper Yeni Çağrı Newspaper Yeni Devir Newspaper Yeni Söz Newspaper Yenigün Newspaper Radyo Haber Radio Station Radyo Gündem Radio Station Radyo Şeker Radio Station Radyo Saray Radio Station Çorlu FM Radio Station Radyocan Radio Station Tempo FM Radio Station | | | |

4.2 Identification of Vulnerable Groups

According to the IFC definition, vulnerability refers to an individual or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources. Vulnerable groups include the older population, children, persons with disabilities, minorities, and people living in poverty. Vulnerable groups can be affected by the Project impacts differently than others and do not have equal access to the Project opportunities and benefits.

During the community level surveys, vulnerable groups were identified and included in the Project ESIA (Table 3). The identification of vulnerable groups will be an ongoing process; therefore, the Project CLOs will be responsible of identifying and continuing to engage with vulnerable groups throughout the Project's lifespan.

Social assistance and solidarity foundations linked with the Provincial Governorship provide support to vulnerable groups at the provincial level. Every district in İstanbul and Tekirdağ has a Social Assistance and Solidarity Foundation established to meet the needs of vulnerable groups and people in need and affiliated with The Ministry of Family and Social Services. In addition to social assistance and solidarity foundations, there are also social services centres in every district responsible for the supply and maintenance of social services

While age does not create vulnerability by itself, certain problems experienced commonly by a particular group of people due to their age create social vulnerability. In this case, older adults may be considered a vulnerable group regarding physical, social, economic, and environmental factors. Considering the relatively lower education levels of the older population and their difficulties in adapting to the changes arising from the Project, this group is considered as a vulnerable group.

In cities, assisted living is one of the services provided by public and private institutions. Assisted living is a centre that provides a social life where older adults, who have difficulty sustaining their lives above a certain age, cared for 24 hours a day and life.

In İstanbul, there are nine public institutions located in the Bahçelievler, Beylikdüzü, Üsküdar, Beşiktaş, Çekmeköy, Sarıyer, Maltepe, Sultangazi, Zeytinburnu districts that provide assisted living for older adults affiliated with The Ministry of Family and Social Services İstanbul Provincial Directorate. In Tekirdağ, there are three public institutions located in the Çorlu, Malkara and Süleymanpaşa districts that provide assisted living for older adults affiliated with The Ministry of Family and Social Services Tekirdağ Provincial Directorate.

Metropolitan and district municipalities provide social services for people with disabilities. All municipalities have a unit or directorate responsible for social services provided for vulnerable groups. The type and the scope of these social services vary according to the different numbers and needs of people with disabilities living in the provinces and districts.

Unemployed people and people living in poverty may be other concepts to be considered while discussing vulnerable groups. These unemployment trends highlight the ongoing challenge regarding unemployment among women and young people, which the Project aims to address by creating temporary employment opportunities during the construction phase. By focusing on the high unemployment rates within occupational groups like physical workers, sales consultants, and cleaning officers in İstanbul and Tekirdağ, the Project can provide much-needed employment, even if only for a limited time.

From the early phases of the Project, special consideration and assistance will be provided to people identified as vulnerable to ensure inclusivity on decision making, grievance mechanism and information spread has been established to all targeted stakeholders. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner.

The potential negative impacts on vulnerable groups in the project area can be minimized by providing assistance for:

- the processes required for applying to legal resources,
- accessing compensation,
- finding alternative land/ housing option where necessary,
- helping to access educational opportunities and professional development programs,
- access to essential public services such as water, electricity, and sanitation.

Additional support such as prioritizing them in recruitment, offering travel support especially for accessing healthcare and education services when needed and supporting the individuals who do not speak the local language or have literacy challenges in understanding official documents or communication processes will be considered and implemented if necessary.

Table 3: Vulnerable Groups in the Neighbourhoods

| District | Neighbourhoods | Illiterate | Cannot speak Turkish | Mobile beekeeper | Refugee | Woman household | Living with social aid | At education age but not involved in education | Bedridden Patients | Living alone over 70 years old | People with physical disabilities | People with mental disabilities |
|----------------------|-----------------------|------------|----------------------|------------------|---------|-----------------|------------------------|--|--------------------|--------------------------------|-----------------------------------|---------------------------------|
| Silivri | Değirmenköy Fevzipaşa | 5 | 20 | 15 | 50 | 150 | 0 | 0 | 100 | 11 | 6 | 1 |
| | Alipaşa | 5 | 0 | 0 | 0 | 0 | 0 | 5 | 93 | 0 | 0 | 0 |
| | Çeltik | 10 | 1 | 7 | 10 | 2 | 1 | 0 | 1 | 0 | 1 | 2 |
| | Yolçatı | 2 | 0 | 7 | 7 | 10 | 6 | 5 | 4 | 4 | 1 | 0 |
| | Çanta Sancaktepe | 10 | 0 | 0 | 150 | 250 | 50 | 0 | 150 | 0 | 0 | 0 |
| | Çanta Balaban | 10 | 10 | 0 | 30 | 200 | 18 | 5 | 10 | 50 | 20 | 10 |
| | Gümüşyaka | 0 | 0 | 10 | 0 | 0 | 500 | 0 | 2,000 | 10 | 10 | 10 |
| | Semizkumlar | 20 | 150 | 0 | 0 | 0 | 150 | 0 | 150 | 0 | 0 | 0 |
| | Danamandıra | 0 | 0 | 6 | 40 | 10 | 60 | 0 | 0 | 6 | 0 | 5 |
| Çorlu | Seymen | 0 | 0 | 15 | 12 | 30 | 15 | 0 | 200 | 5 | 7 | 4 |
| | Şahbaz | 0 | 0 | 2 | 8 | 15 | 0 | 0 | 0 | 1 | 1 | 2 |
| | Türkgücü | 0 | 0 | 10 | 0 | 20 | 15 | 0 | 10 | 20 | 10 | 2 |
| | Yenice | 0 | 0 | 20 | 20 | 50 | 20 | 0 | 45 | 25 | 15 | 12 |
| | Maksutlu | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 5 | 0 | 0 | 0 |
| Marmaraeğlisi | Türkmenli | 0 | 0 | 10 | 1 | 0 | 2 | 0 | 0 | 15 | 0 | 0 |
| | Yakuplu | 0 | 2 | 6 | 5 | 20 | 0 | 0 | 0 | 1 | 1 | 2 |
| | Çeşmeli | 0 | 0 | 5 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 |

| District | Neighbourhoods | Illiterate | Cannot speak Turkish | Mobile beekeeper | Refugee | Woman household | Living with social aid | At education age but not involved in education | Bedridden Patients | Living alone over 70 years old | People with physical disabilities | People with mental disabilities |
|---------------------|-----------------------|------------|----------------------|------------------|---------|-----------------|------------------------|--|--------------------|--------------------------------|-----------------------------------|---------------------------------|
| Süleymanpaşa | Aydoğdu | Unknown | Unknown | Unknown | Unknown | Unknown | Unknown | Unknown ² | Unknown | Unknown | Unknown | Unknown |
| | Karaevli | 0 | 0 | 0 | 0 | 3 | 3 | 0 | 0 | 2 | 0 | 0 |
| | Gazioğlu | 1 | 2 | 30 | 0 | 1 | 0 | 0 | 0 | 10 | 2 | 0 |
| | Köseilyas | 0 | 0 | 0 | 10 | 6 | 3 | 0 | 4 | 0 | 1 | 1 |
| | Husunlu | 0 | 0 | 0 | 0 | 25 | 15 | 0 | 10 | 25 | 1 | 0 |
| | Çiftlikönü (Gündoğdu) | 150 | 150 | 0 | 0 | 0 | 150 | 0 | 0 | 0 | 0 | 0 |
| | İstiklal (Eskicami) | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 23 | 0 | 5 | 0 |
| | Karahisarlı | 0 | 0 | 0 | 0 | 2 | 0 | 3 | 0 | 0 | 0 | 0 |
| | Kayı | 0 | 0 | 3 | 10 | 3 | 0 | 0 | 10 | 0 | 1 | 1 |
| | Yağcı | 0 | 0 | 0 | 10 | 8 | 0 | 0 | 80 | 5 | 4 | 1 |
| | Zafer | 200 | 0 | 0 | 0 | 0 | 20 | 0 | 0 | 0 | 0 | 0 |
| | Osmanlı | 0 | 0 | 0 | 27 | 4 | 2 | 0 | 1 | 2 | 2 | 0 |
| | Seymenli | 3 | 0 | 0 | 3 | 5 | 3 | 0 | 7 | 5 | 3 | 0 |
| | Güvençli | 0 | 0 | 0 | 1 | 5 | 1 | 0 | 2 | 0 | 0 | 0 |
| | Nusratfakı | 5 | 0 | 0 | 0 | 6 | 2 | 0 | 10 | 2 | 0 | 0 |
| | İnecik | 0 | 0 | 4 | 0 | 3 | 4 | 0 | 0 | 0 | 3 | 3 |
| | Nusratlı | 5 | 0 | 15 | 1 | 0 | 0 | 7 | 5 | 0 | 0 | 0 |

² During the interview, it was noted that Aydoğdu neighbourhood hosts Roman community with approximately 10,000 people whose literacy levels are lower, and many children do not attend school. The specific numbers are not available.

| District | Neighbourhoods | Illiterate | Cannot speak Turkish | Mobile beekeeper | Refugee | Woman household | Living with social aid | At education age but not involved in education | Bedridden Patients | Living alone over 70 years old | People with physical disabilities | People with mental disabilities |
|----------------|----------------|------------|----------------------|------------------|---------|-----------------|------------------------|--|--------------------|--------------------------------|-----------------------------------|---------------------------------|
| | Mahramlı | 0 | 0 | 3 | 5 | 8 | 1 | 0 | 0 | 0 | 0 | 1 |
| | Kınıklar | 2 | 0 | 2 | 2 | 2 | 2 | 0 | 0 | 0 | 0 | 0 |
| Malkara | Dereköy | 0 | 0 | 0 | 0 | 10 | 1 | 0 | 1 | 1 | 1 | 1 |
| | Yenice | 2 | 0 | 0 | 0 | 16 | 0 | 0 | 0 | 10 | 0 | 0 |
| | Hereke | 0 | 0 | 0 | 0 | 10 | 4 | 4 | 5 | 0 | 0 | 2 |
| | Ahievren | 0 | 15 | 5 | 15 | 10 | 5 | 0 | 0 | 6 | 2 | 0 |
| Şarköy | Tepeköy | 0 | 0 | 15 | 0 | 0 | 0 | 20 | 5 | 0 | 3 | 5 |
| Muratlı | Yukarısirt | 0 | 0 | 10 | 0 | 2 | 1 | 4 | 1 | 0 | 1 | 0 |

5.0 STAKEHOLDER ENGAGEMENT TOOLS

The purpose of the identification of various tools and methods for the stakeholder engagement is; to provide for all stakeholders to access the Project with the means of their choice to ensure meaningful stakeholder participation. The effectiveness of engagement tools will be monitored, and, if necessary, new engagement tools will be developed.

Table 4: Stakeholder Engagement Tools

| Stakeholder Tools | Engagement | Content of the Tools |
|---|------------|--|
| Community meetings | | ÇOK A.Ş./EPC Contractor/KGM will conduct community meetings with the assistance of the Mukhtars in the affected settlements with considering the COVID-19 measures to inform the stakeholder on the environmental and the social impacts of the Project, introduce CLOs to the community members and inform them about the grievance mechanism. |
| Project website | | <p>A Project website will be established and will be the most essential platform/tool for online engagement with stakeholders and it will be used to communicate up to date information related to the Project. The Project related documentation, including ESIA, NTS, SEP and other supporting management plans, will be disclosed through the Project website. It will be ensured that the below listed documents, at minimum level, disclosed on the Project website:</p> <ul style="list-style-type: none"> ▪ Project Information including the purpose of the Project, ▪ Project location and general Project layout, ▪ Permissions/approved EIA reports, ▪ Project progress and timeline, ▪ Environmental and Social Policy of the Project, ▪ Draft ESIA Report ▪ Non- Technical Summary (NTS) ▪ SEP ▪ Grievance mechanism and the grievance forms ▪ Contact details of the CLOs and other relevant key personnel |
| Online meetings | | Online meetings will be conducted with the NGOs, governmental institutions where internet access is available. |
| Phone calls, e-mails text messaging | | The phone number/e-mail address of the CLOs will be widely distributed. CLOs will engage directly with stakeholders through phone calls or emails or text messaging on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested. |
| Project Hotline | | A hotline will be established to allow the project stakeholders convey their grievances (complaints, opinions, and suggestions etc.). This phone number is especially planned to ensure more active participation of vulnerable groups and women who have problems in accessing the internet. The phone number will be posted on stakeholder institutions such as provincial directorates, municipalities, the mukhtars' offices of the affected surrounding settlements, and public spaces. |
| Grievance boxes (Wish and Complaint Boxes) for employees | | For the employees working at the Project will be provided grievance boxes to convey their complaints, concerns, and opinions through these boxes. It should be located in areas that can be easily reached by the employees, such as the cafeteria and resting area. |

| Stakeholder Tools | Engagement | Content of the Tools |
|--|-------------------|--|
| Grievance boxes for external stakeholders | | Grievance boxes, including simple-to-use forms will be placed at points where stakeholders can easily access to share complaints, suggestions, and opinions. Especially the disadvantaged stakeholder groups and vulnerable groups living in the affected settlements will be considered. Project grievance boxes for external stakeholders should be placed in mukhtars' offices, village cafes, and public spaces in the affected settlements. |
| Social media | | Social media accounts will be used to provide information about the Project progress. |
| Project posters / brochures / flyers/billboards | | A brochure for the Project will be developed that includes information about the Project, ESIA process and provides contact information (e-mail, phone, postal address, and fax) of the Public Relations Department and CLOs of the Project for any grievances. Brochures/flyers/poster/billboards with communication channels, announcements and information about the Project will be available in common public areas in surrounding settlements. Mukhtars' offices, municipalities, provincial directorates, stakeholder professional chambers etc. |
| Grievance Mechanism | | A grievance mechanism (including both internal for workers and external for community) will be developed, allowing stakeholders to raise concerns or complaints personally and via post, electronic mail etc. The procedure seeks to address concerns promptly and is readily accessible to all affected stakeholders. A separate grievance mechanism will also be established for the Project workers. |
| Newspaper | | As appropriate, relevant Project information will also be provided to public media. This activity will mainly be undertaken during ESIA disclosure and construction. It will also occur if any significant changes to the Project are envisaged, impacting local communities or land uses. |
| Face to face meetings | | Open and targeted meetings will continue to be held to engage with stakeholders. |
| Survey | | Surveys will be used when data collection is required during Project phases/ processes. Surveys and questionnaires will be conducted to collect information/ feedback on specific topics, such as Resettlement Action Plan (RAP) including Livelihood Restoration. |
| Focus Group Meetings | | Focus group meetings will be held in the form of face-to-face meetings. Focus group meetings can be defined as an in-depth meeting for approximately 1-1.5 hours with an interest group of 6-12 people (with women, vulnerable groups the elderly, the disabled, female-headed households, immigrants, refugees, etc.). During this process, a moderator and, when necessary, an observer or reporter also attend the meeting. Under the direction of the moderator, data is collected from the participants in line with the subject and objectives of the focus group meeting. |
| In-depth interviews | | In-depth interviews will be held face-to-face. In-depth interviews will be used when data collection is required during Project phases/ processes. |
| Household visits | | Household visits will be held for vulnerable people (people who cannot attend meetings due to health conditions, female-headed households etc.), when needed. |

6.0 PREVIOUS STAKEHOLDER ENGAGEMENT AND CONSULTATION ACTIVITIES

6.1 Stakeholder Engagement Activities for EIA Phase

During the national EIA process of the Kınalı-Balıkesir Motorway (2016), General Directorate of Highways undertook initial consultations and briefings with key national governmental agencies relevant to the Kınalı-Balıkesir Motorway Project as per national requirements.

A total of five public consultation meetings were conducted in İstanbul/Silivri, Tekirdağ/Süleymanpaşa, Çanakkale/Gelibolu, Çanakkale/Çan and Balıkesir/Balya within the scope of the EIA. The purpose of these meetings was to introduce the Kınalı-Balıkesir Motorway Project and its aspects to the stakeholders and collect initial opinions of the attended stakeholders in regard to Kınalı-Balıkesir Motorway and its phases.

Based on the national EIA (2016), following associations, chambers and NGOs expressed their opinion towards the Kınalı-Balıkesir Motorway:

- Çanakkale Ticaret ve Sanayi Odası (Çanakkale Chamber of Commerce and Industry),
- TÜRSAB (Association of Turkish Travel Agencies),
- Bursa Ticaret ve Sanayi Odası (Bursa Chamber of Commerce and Industry),
- Tekirdağ Ticaret ve Sanayi Odası (Tekirdağ Chamber of Commerce and Industry),
- Çanakkale Turistik Otelciler, İşletmeciler ve Yatırımlar Birliği Derneği (Association of Çanakkale Touristic Hotel Keepers, Managers and Investors),
- Kaz Dağları Savunması (Defence of Kaz Mountains-NGO),
- İstanbul Kent Savunması (Defence of İstanbul City-NGO),
- Kuzey Ormanları Savunması (Defence of Northern Forests-NGO),
- TMMOB (Union of Chambers of Turkish Engineers and Architects),
- Şehir Plancıları Odası (Chamber of Urban Planners),
- TMMOB Çevre Mühendisleri Odası (TMMOB Chamber of Environmental Engineers),
- TMMOB Ziraat Mühendisleri Odası (TMMOB Chamber of Agriculture Engineers),
- Kaz Dağı Doğal ve Kültürel Varlıkları Koruma Derneği (Society on Protection of Kaz Mountains Natural and Cultural Assets),
- Emek ve Demokrasi Güçleri Çevre Platform (Environmental Platform of Labour and Democracy Forces-NGO).

6.2 Stakeholder Engagement Activities for Scoping and ESIA Phase

6.2.1 Area of Influence

The Area of Influence ("Aol") of the Project is the area in which a direct or indirect impact on the biological, physical, and social components might occur.

As defined by IFC PS1, the Area of Influence encompasses:

- The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts

from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.

- Associated facilities, which are facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.
- Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

The settlements that are included in the social Area of Influence of the Project is presented in Table 5.

Table 5: Social Area of Influence of the Project

| Province | District | Settlements | Project Component |
|----------|--------------|-------------------------|-------------------------------|
| İstanbul | Silivri | Alipaşa | Route |
| | | Çanta Balaban | Route and Associated Facility |
| | | Çeltik | Route and associated facility |
| | | Danamandır | Associated Facility |
| | | Değirmenköy (Fevzipaşa) | Route |
| | | Gümüşyaka | Route and Associated Facility |
| | | Semizkumlar | Route |
| | | Çanta Sancaktepe | Route |
| | | Yolçatı | Route |
| Tekirdağ | Çorlu | Maksutlu | Route |
| | | Seymen | Associated Facility |
| | | Şahbaz | Route |
| | | Türkgücü | Route and Associated Facility |
| | | Yenice | Route |
| Tekirdağ | Süleymanpaşa | Aydoğdu | Route |
| | | Çiftlikönü (Gündoğdu) | Route |
| | | Gazioğlu | Route and Associated Facility |
| | | Güveçli | Route |
| | | Husunlu | Route and Disposal |
| | | İnecik | Route and Associated Facility |
| | | İstiklal (Eskicami) | Route |
| | | Karaevli | Route |
| | | Karahisarlı | Route |
| | | Kayı | Route |
| | | Kınıklar | Route and Associated Facility |
| | | Köseilyas | Route |

| Province | District | Settlements | Project Component |
|-----------------|------------------------|-------------|-------------------------------|
| | | Mahramlı | Route |
| | | Nusratfakı | Route and Associated Facility |
| | | Nusratlı | Route |
| | | Osmanlı | Associated Facility |
| | | Seymenli | Route and Associated Facility |
| | | Yağcı | Route and Associated Facility |
| | | Zafer | Route |
| Tekirdağ | Marmaraereğlisi | Çeşmeli | Route |
| | | Türkmenli | Route and Associated Facility |
| | | Yakuplu | Route |
| Tekirdağ | Malkara | Ahievren | Route |
| | | Dereköy | Associated Facility |
| | | Hereke | Route |
| | | Yenice | Route |
| Tekirdağ | Muratlı | Yukarısırt | Route |
| Tekirdağ | Şarköy | Tepeköy | Associated Facility |

6.2.2 Field Visits

According to preliminary analysis and desktop studies, 49 settlements were determined to be affected by the Project based on land acquisition, physical and economic displacement. Field visits for the socioeconomic baseline studies were first conducted between January 8th and 14th, 2023 for 49 settlements. Community level surveys were conducted with the mukhtars of the settlements and household surveys were performed in the settlements included in the Project Aol.

Following this period, changes were made to the Project route to minimize environmental impacts, particularly on archaeological components. Detailed information regarding the route changes is provided in the Project ESIA. The Project route was finalized in April 2024, resulting in the inclusion of new settlements within the Project Area of Influence (Aol) and the exclusion of certain previous settlements. To evaluate the potential impacts on the newly included settlements, a second socioeconomic baseline field study was conducted from May 2nd to 4th, 2024, covering 13 settlements. The settlements covering the second field study are Alipaşa, Aydoğdu, İstiklal, Çiftlikönü, Hereke, Karahisarlı, Mahramlı, Nusratlı, Semizkuşlar, Zafer, Değirmenköy, Fevzipaşa, Tepeköy and Yukarısırt.

The demographic information of the settlements was collected through the community level surveys, and through the household surveys, both the demographic structure of the households and the anticipated impacts of the Project, including land acquisition, were asked to the participants.

Project and KGM officials were present during the field surveys to inform stakeholders about the Project and address their questions. They also gathered stakeholder inputs to ensure comprehensive feedback.

7.0 FUTURE STAKEHOLDER ENGAGEMENT AND CONSULTATION ACTIVITIES

7.1 Stakeholder Engagement Activities for Land Acquisition

Stakeholder engagement activities in relation to land acquisition and expropriation process will be made accordingly to the national regulations and IFC PS 5. At this stage of the Project, no engagements have been conducted in relations to the land acquisition.

For the Project, a RAP will be prepared in accordance with the IFC PS 5 and other applicable national regulations. Within the scope of RAP, all stakeholders affected by land acquisition and expropriation activities will be identified and engaged.

Within the scope of the SEP, all targeted stakeholders to be affected by the land acquisition of the Project will be engaged and summary of the engagement records will be reflected as the Project progress.

7.2 Stakeholder Engagement Activities for General Information Disclosure

Future stakeholder engagement activities for general information disclosure will focus on enhancing awareness and transparency about the Project. These activities will include public meetings, informational materials, and updates through various communication channels such as the Project website and social media. Scheduled throughout the Project's timeline, they aim to reach all relevant stakeholders, provide key updates, and solicit feedback. Responsibilities for these activities will be assigned to designated team members to ensure effective dissemination of information.

8.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement programme aims to inform, disclose, and consult with all stakeholders using the various engagement tools. Different engagement tools are proposed to ensure Informed Consultation and Participation during the Project implementation in a culturally appropriate manner, respectful of human rights and considering gender inclusion.

8.1 Proposed Programme for Project Phases

The proposed stakeholder engagement programme is presented in Table 6.

Pre-construction activities will focus on disclosure of the Project information, including the Project route, construction schedule, land acquisition and land access issues.

With the preparation of the ESIA, the ESMS and related management plans will be prepared and the ESMS will be structured to mitigate impacts on labour and working conditions, community health and safety, resettlement and economic displacement, and transportation through the implementation of the relevant management plans by contractors and subcontractors, etc. during the construction phase. Engagement activities during the construction phase will focus on minimising project-related construction impacts.

During the transition from the construction phase to the operation phase, the SEP will be updated to address operational activities.

The SEP will undergo annual updates to incorporate the latest Project developments and information. It will also be revised as needed based on feedback received during the disclosure period of the draft ESIA. Stakeholder identification will be reassessed, and the stakeholder list will be updated accordingly.

Regular stakeholder engagement activities will be conducted throughout all Project phases to keep stakeholders informed about Project progress. Special activities during construction, such as energy resource disruptions, or road closures, will be communicated promptly by the Community Liaison Officers (CLOs).

Detailed engagement activities for the operational phase of the Project will be defined six months prior to construction activities. The local communities will be informed about the transition period, the impact of the operational phase, the displacement of local employment and the reduction in demand for goods and services. The CLOs of the Project will be trained on the implementation of the SEP and the contact details of the CLOs will be provided to all affected stakeholders.

Table 6: Stakeholder Engagement Programme

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|----------------------------|---|--|---|---|---|-----------------------------------|
| Before Construction | Project Affected People PAPs affected by the expropriation (landowners, land users, businesses, employees of affected businesses, physically displaced people) Residents of the settlements in the social area of influence Vulnerable groups | Route selection Land acquisition & Expropriation and compensation process | Community meetings Face to face meetings | In each directly affected settlement Project office as per the request of the PAPs Mukhtars' offices Village public areas | Before construction activities begin Monthly | KGM ÇOK A.Ş. EPC Contractor |
| | Governmental Parties Municipalities Governors District authorities Academic institutions | Route selection Land acquisition & Expropriation and compensation process | Face to face meetings | Project office as per the request of the PAPs Key stakeholders in the affected districts Key stakeholders in the affected provinces | Before construction activities begin Monthly | KGM ÇOK A.Ş. EPC Contractor |
| | Non-governmental Parties Press and media NGOs Businesses and business organisations Workers' organisations | Route selection Land acquisition & Expropriation and compensation process | Face to face meetings | Affected districts and Provinces Project office as per the request of the PAPs NGO's Project offices as per the request of the stakeholders | Before construction activities begin Quarterly | KGM ÇOK A.Ş. EPC Contractor |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|---------------|---|---|---|--|---|--|
| | Project Affected People PAPs affected by the expropriation (landowners, land users, businesses, employees of affected businesses, physically displaced people) Residents of the settlements in the social area of influence Vulnerable groups | SEP and ESIA site studies Introduce Project CLOs and subcontractors Stakeholder engagement SEP Grievance mechanism process Employment Vulnerability and gender issues Community health and safety issues Project update Resettlement and livelihoods | Community meetings Face to face meetings Focus Group Meetings In-depth interviews Survey Project brochure | In each directly affected settlement Project office as per the request of the PAPs Mukhtar offices Village public areas | Before construction activities begin Quarterly | ÇOK A.Ş., Consultants of ÇOK A.Ş. EPC Contractor |
| | Governmental Parties Municipalities Governors District authorities Academic institutions | Environmental and Social Impacts of the Project and the mitigation measures Disclosure of the Stakeholder engagement process and the grievance mechanism process | Stakeholder visits Online meeting In-depth interviews Face to face meetings E-mail address of the Project Phone calls Poster / Brochures / flyers | Directly affected villages Key stakeholders in the affected districts Key stakeholders in the affected provinces | Before construction activities begin Quarterly | ÇOK A.Ş. EPC Contractor |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|---------------|--|---|--|--|--|--|
| | <p>Non-governmental Parties</p> <p>Press and media</p> <p>NGOs</p> <p>Businesses and business organisations</p> <p>Workers' organisations</p> | <p>Environmental and Social Impacts of the Project and the mitigation measures</p> <p>Disclosure of the Stakeholder engagement process and the grievance mechanism process</p> | <p>Stakeholder visits</p> <p>Online meeting</p> <p>In-depth interviews</p> <p>Face to face meetings</p> <p>E-mail address of the Project</p> <p>Phone calls</p> <p>Poster / Brochures / flyers</p> | <p>Affected districts and Provinces</p> <p>Project office as per the request of the PAPs</p> <p>NGO's Project offices as per the request of the stakeholders</p> | <p>Before construction activities begin</p> <p>Biannual meetings</p> | <p>ÇOK A.Ş.</p> <p>EPC Contractor</p> <p>Subcontractors of ÇOK A.Ş. / EPC Contractor</p> |
| Construction | <p>Project Affected Parties and/or PAPs</p> <p>Project Affected People</p> <p>PAPs affected by the expropriation (landowners, land users, businesses, employees of affected businesses, physically displaced people)</p> <p>Residents of the people in the Project Aol</p> <p>Vulnerable groups</p> <p>Local businesses</p> | <p>To update information on the updated construction status</p> <p>Receive construction-related grievances</p> <p>Environmental and social awareness</p> <p>Construction phase E&S impacts</p> <p>Community health and safety issues</p> <p>Local employment</p> <p>Impact on livelihoods due to construction</p> | <p>Community meetings</p> <p>Face to face meetings</p> <p>Focus Group Meetings</p> <p>In-depth interviews</p> <p>Survey</p> <p>Project brochure</p> <p>Poster / Brochures / flyers</p> | <p>In each directly affected settlement</p> <p>Project office as per the request of the PAPs</p> <p>Mukhtar offices</p> <p>Village public areas</p> | <p>Before construction activities begin</p> <p>Quarterly meetings in all affected settlements</p> <p>With the start of construction activities</p> | <p>ÇOK A.Ş.</p> <p>EPC Contractor</p> <p>Subcontractors of ÇOK A.Ş. / EPC Contractor</p> |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|---------------|---|---|---|--|--|---|
| | | Construction updates and construction schedule | | | | |
| | Other Interested Parties Governmental intuitions National and local media Non-governmental institutions Business organisations | Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule | Stakeholder visits Online meeting In-depth interviews Face to face meetings E-mail address of the Project Phone calls Poster / Brochures / flyers | Stakeholder's workplaces Project office as per the request of the stakeholders When Project Milestones are achieved | Biannual meetings When required | ÇOK A.Ş. EPC Contractor Subcontractors of ÇOK A.Ş. / EPC Contractor |
| | Project Affected Parties and/or PAPs Project Affected People PAPs affected by the expropriation (landowners, land users, businesses, employees of affected businesses, physically displaced people) Residents of the people in the Project Aol Vulnerable groups | Community health and safety meetings Transit route of heavy vehicles and Project access roads High traffic times and places Restrictions Land crossings and animal crossings Dust, noise, vibration issues | Community meetings Face to face meetings Project brochure Poster / Brochures / flyers | In each directly affected settlement Project office as per the request of the PAPs Mukhtar offices Village public areas | With the start of construction activities, In a meaningful time before the Project construction activities, that may require | ÇOK A.Ş. EPC Contractor Subcontractors of ÇOK A.Ş. / EPC Contractor |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|---------------|---|---|---|---|--|----------------------------|
| | Local businesses | | | | precautions regarding community health and safety Quarterly | |
| Operation | Project Affected Parties Project Affected People PAPs affected by the expropriation (landowners, land users, businesses, employees of affected businesses, physically displaced people) Residents of the people in the Project Aol Vulnerable groups Local businesses | The transition process from the construction and operation phase Introduce operation phase CLOs Introduce the roles for the operation phase grievances Operation phase E&S issues, especially community health and safety Information disclosure on national and local media Brochures and information banners at the stations | Community meetings Community meetings Stakeholder visits Project brochure Poster / Brochures / flyers | In each settlement Project office as per the request of the PAPs | Following the completion of the construction phase Quarterly in operation | ÇOK A.Ş. EPC Contractor |
| | Other Interested Parties (External) Governmental and non-governmental bodies Local businesses | Information disclosure on national and local media Brochures and information banners at the stations | Project website Social media Newspaper | Institution visits Project office as per the request of the stakeholders | Following the completion of the | ÇOK A.Ş. EPC Contractor |

| Project stage | Target stakeholders | Topic(s) of engagement | Engagement Tool | Location | Frequency | Responsibilities |
|---------------|---------------------|------------------------|---|--------------------------------------|--|------------------|
| | Tourists | | Information sharing on billboards in public places or public areas Poster / Brochures / flyers | When Project Milestones are achieved | construction phase Quarterly in operation | |

8.2 Proposed Strategy for the Information Disclosure

Following the approval of the Project documentation the full ESIA, SEP, RAP, and NTS will be published electronically on the Project website and will be available in Turkish and English. The hard copies of the NTS and SEP will be provided to the mukhtars of the affected settlements for the distribution to the PAPs. The NTS will at least cover:

- Brief description of the Project,
- Project timeline,
- Information on environmental and social studies carried out to date,
- Impact summary and mitigation measures,
- Description of public consultation arrangements (time, place),
- Information on RAP, and
- Tools for the submission of grievances, comments, and feedback.

Further announcement regarding the Project updates and awareness, following tools will be used:

- Project website,
- Social media,
- The notice boards of the mukhtars' offices, and
- Leaflets and banners.

It is anticipated that NGOs, associations, and other interested organizations will be notified on the disclosure process and website links for the Project documents will be shared. When requested, hard copies of the disclosure package will be sent via post mail.

During the Project development and construction phase, the CLOs will prepare quarterly reports that present the Project's social performance and the engagement activities, and the grievance mechanism outputs.

8.3 Proposed Strategy for Consultation

This SEP is developed to engage with the stakeholders during the Project's construction and operation phases to inform stakeholders on the Project activities, resolve their grievances, and involve stakeholders during the decision processes in a participatory approach. In order to establish sound stakeholder engagement activities following consultations strategies will be applied from the early phases of the Project as:

- Women CLOs will be hired to encourage the participation of women, receive and report gender-specific grievances, and conduct "Women Only" consultation activities when required.
- Targeted consultations will be carried out with the identified vulnerable people to ensure their participation during the information disclosure, engagement, and grievance management.
- All proposed engagement tools will provide the names of the CLOs, the contact details, and the grievance mechanism.

9.0 GRIEVANCE MECHANISM

A grievance is considered any complaint or opinion (including comments/feedback/questions/suggestions/request) regarding the execution of the Project and impacts from project activities. The Grievance

Mechanism will be developed as a part of the SEP of the Project, explaining the management process that will ensure that the grievances from the stakeholders are resolved in a healthy, correct, and timely manner.

The Grievance Mechanism will cover all internal and external stakeholders and all employees. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies.

The grievance mechanism will be developed in parallel with the grievance mechanism procedure of 1915 Çanakkale Bridge and Motorway project, which is another part of the *Kınalı-Balıkesir Motorway* project, in order to provide convenience and integrity in implementation.

As in the 1915 Çanakkale Bridge and Motorway Project grievance management procedure, PAPs and other relevant stakeholders are involved throughout the entire Project, in line with international good practices.

Grievances can be submitted by PAPs and other stakeholders through the following methods:

- Submitting a grievance in person to Mukhtars and/or grievance form to be submitted via Mukhtar
- By mail (to the postal address of ÇOK A.Ş. or EPC Contractor),
- Via e-mail to ÇOK A.Ş. or EPC Contractor,
- By calling the Project Hotline to be established,
- Submitting a grievance to CLOs by telephone,
- Submitting a grievance in person to CLOs.

The objectives of the grievance mechanism are to:

- Provide affected people with culturally appropriate ways and means of stating their grievances during the Project (from site preparation to decommissioning phase),
- Ensure that grievances are treated confidentially and are not shared outside the process,
- Establish transparent and mutually respectful relations with communities,
- Ensure that corrective actions are identified and taken,
- Verify that affected people are satisfied with the corrective actions taken, and
- Avoid the need for judicial actions; the grievance mechanism, however, does not prevent stakeholders from accessing the judiciary system.

Main steps will be followed for management of grievances are presented below:

- Step 1: receipt of grievance,
- Step 2: assessment,
- Step 3: acknowledgement of grievance,
- Step 4: investigation and resolution of grievance,
- Step 5: closure, and
- Step 6: outcome of the corrective action.

9.1 Governmental Grievance Mechanism- all stakeholders

The public can raise any issues, complaints, and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and state open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints, and requests can be both received and responded to through this national online system.

The CIMER system enables stakeholders to communicate directly with ÇOK A.Ş./EPC Contractor during the Project lifespan. Still, a separate grievance mechanism system will be established for the Project in which the stakeholders can receive their responses locally and communicate their complaints. This Project-level grievance system will be established within ÇOK A.Ş./EPC Contractor, implemented, and followed during the Project lifespan.

Affected communities will be informed of their right to escalate grievances through the Project grievance mechanism and, if the Project GRM response is unsatisfactory, through alternative mechanisms such as CIMER.

9.2 Internal Grievance Mechanism – for Workers

The internal grievance mechanism of ÇOK A.Ş./EPC Contractor will be adopted for the use of Project workers. All direct and indirect Project workers will follow this procedure. The procedure defines grievances as a statement of dissatisfaction over any condition that allegedly harms the employee. A grievance may relate to matters involving internal communication, responsibilities abuse, abuse in the authority line, race, colour, ancestry, national origin, religion, age, sex, sexual orientation, gender identity, sexual harassment, or disability status.

In case requested, all grievance holders will have the right to remain anonymous and maintain their confidentiality. ÇOK A.Ş./EPC Contractor will not disclose any grievance holder's credentials without ensuring their consent first. If such consent is given, only the managers and personnel related to that specific grievance will be informed.

Additionally, the grievance mechanism will incorporate a gender-sensitive approach to address concerns related to Gender-Based Violence and Harassment (GBVH) prior to the construction phase. Details on handling gender-based grievances through the grievance mechanism will be outlined in this SEP and the Project's Employment Policy Document when its developed. The grievance mechanism will ensure confidentiality, sensitivity, and support for affected individuals while allowing for anonymous submissions. The Project will ensure that the design of the worker grievance mechanism to be developed and implemented includes effective methods for addressing the needs of victims of GBVH. Female CLOs will be designated to receive and coordinate gender-related grievances to ensure sensitive and appropriate handling of such matters.

Sample of the Internal Grievance Form is presented in APPENDIX C.

9.3 External Grievance Mechanism – for communities

ÇOK A.Ş./EPC Contractor will develop and implement external grievance mechanism for the Project. The external grievance mechanism will be part of the management system. It will respond to any concerns and complaints, especially from affected stakeholders and communities. Special attention will be given to the training of the designated staff involved in the management of the grievance redressal mechanism. The overall objective of the External Grievance Mechanism is to provide an opportunity for all stakeholders to obtain information about Project activities and facilities, to submit their complaints and concerns in a structured and formal manner, and to receive prompt, fair and effective responses.

Comments or concerns may be made to the ÇOK A.Ş./EPC Contractor verbally, in writing (by post or email) or by completing a Grievance Form. The grievance form will be made available on the Project website, at the Project site, at the mukhtars' office, alongside a description of the grievance mechanism.

Grievance forms will be available at least in the following areas, with explanatory posters, and grievance submissions can be made at these locations. As the number of these areas increases and the address details of locations outside the Muhtar offices become available, the SEP will be updated to include these additions:

- Muhtar offices of the settlements impacted by the project
- Project construction site entrance areas
- Project laydown area entrances
- Project camp site entrances

Grievance forms can then be submitted to the contact points whose details are provided in Liabilities. Grievance channels for the community will include the following:

- **Grievance Forms:** The formal method for submitting written complaints or concerns.
- **Mukhtars:** Mukhtars can receive and communicate grievances to the Project CLOs on behalf of the community.
- **Project CLOs In Person:** CLOs will be available in person to listen to and address grievances.
- **Project CLOs by Telephone:** A phone line will be dedicated to receiving grievances and concerns.
- **Project Email Address:** An official email address will be determined for receiving grievances electronically.

These channels will ensure that community members have various accessible options for raising their concerns and seeking resolutions.

All grievances will be:

- Acknowledged within three days after receipt, and
- Responded no later than within 30 days after receipt.

Specifically, nominated, and trained members of staff will record grievance information in a grievance log.

Female CLOs will be designated to receive and coordinate gender-related grievances to ensure sensitive and appropriate handling of such matters.

The workflow of the grievance mechanism is shown in Figure 3.

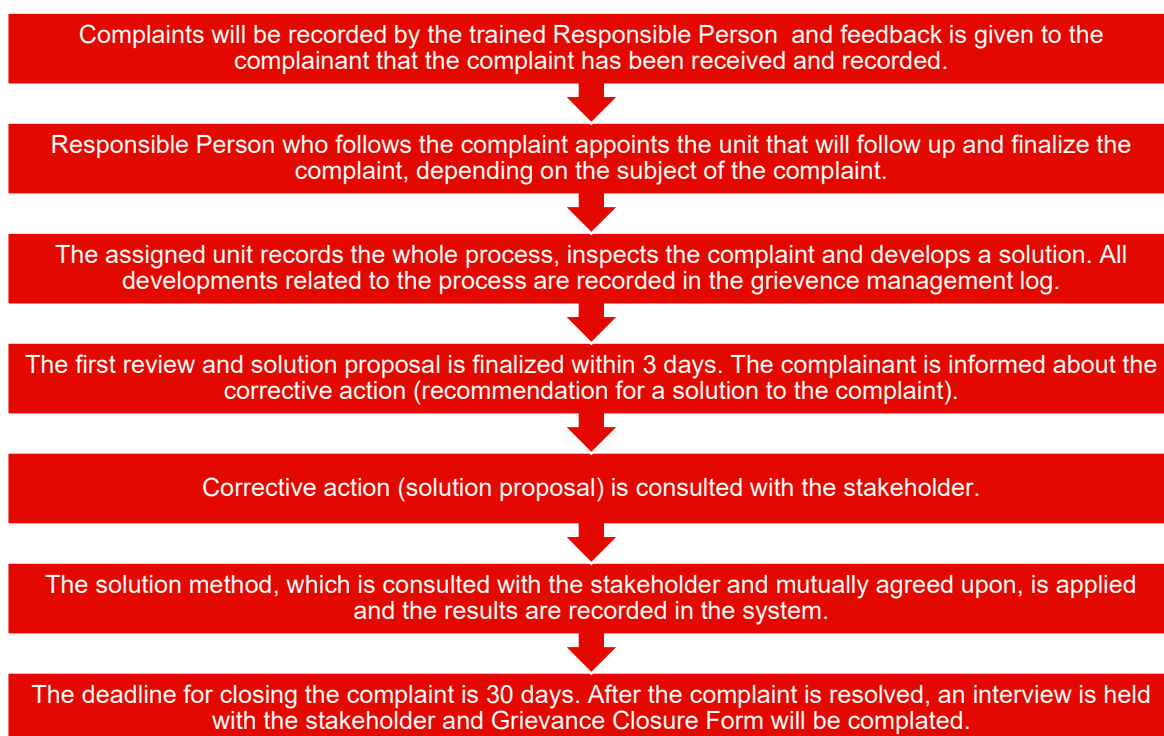


Figure 3: Grievance Management Workflow

The grievance mechanism will be widely announced to the public with stakeholder meetings. Additional meetings will be organized to target women PAPs and vulnerable groups, if needed, for sharing information on grievance mechanism.

Sample of the External Grievance Form is presented in APPENDIX D.

9.4 Receiving and Assessment of Anonymous Grievances

If external and internal stakeholders have difficulties in providing their contact information or/and identification; grievances submitted by stakeholders will be evaluated and recorded as anonymous complaints or anonymous suggestions.

Stakeholders can convey all of their wishes and complaints, without specifying their names, to the grievance boxes placed at specific points for external stakeholders or via hotline which will be provided by the Project.

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 grievance 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.

10.0 MONITORING

The monitoring activities will be carried out throughout the Project phases to assess the compliance of the SEP with the Project standards. In the event that the non-conformance with the Project standards identified through monitoring, these will be investigated, and appropriate corrective actions will be identified.

The Project SEP will be reviewed and updated bi-annually as needed. Grievances will be recorded and collected monthly, with reports submitted to Project Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used for evaluation of:

- transparency and accessibility of the engagement process,
- provision of relevant information,
- timeliness of responses (ongoing communication),
- clarity and simplicity of information provided,
- project impacts, and
- applicability and relevance of the information provided.

A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. The Table 7 below summarizes the KPIs and associated key monitoring actions that will be used to assess the progress and effectiveness of the SEP.

Table 7: Key Performance Indicators (KPIs) and monitoring actions – Stakeholder Engagement

| ID | KPI | Target | Monitoring Measure |
|--|---|--|------------------------------|
| Consultation and Information Disclosure | | | |
| SEP-KPI-01 | Registration of stakeholder engagement activities | Target of 100% | Stakeholder Meeting Register |
| SEP-KPI-02 | <ul style="list-style-type: none"> ■ Consultation records ■ Materials shared with the stakeholders (brochure, presentations) ■ Number of the meetings held ■ Number of the participants who attended the public consultation meetings ■ Visits to local authorities or other local stakeholders ■ Frequency of the visits to the settlements affected by the Project ■ Number of newspapers to share the information ■ Any updates on the Project website ■ Any type of announcements (information banners, calls) | Delivery of regular reports on the consultation activities | Reporting |
| SEP-KPI-03 | <ul style="list-style-type: none"> ■ Disclosure of Project's environmental and social performance reports | Disclosure of reports on an annual basis | Project Website |

| ID | KPI | Target | Monitoring Measure |
|--|--|--|--------------------------------|
| Implementation of Grievance Mechanism | | | |
| SEP-KPI-04 | Number of complaints/grievances received from community | The total number reduced per year | Request and Grievance Register |
| SEP-KPI-05 | Number of complaints/grievances responded to within targeted time frame | The target of 100% | Request and Grievance Register |
| SEP-KPI-06 | Reporting of grievance records summaries | Quarterly | Reporting |
| SEP-KPI-07 | Reporting back to stakeholders in the implementation of the grievance mechanism | Delivery of regular reports to stakeholders on the outcomes of the grievance mechanism | Reporting |
| SEP-KPI-08 | Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed | Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame | Audit report |

11.0 REPORTING

Grievances will be recorded and collected monthly, with reports submitted to Project Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used to assess both the number and nature of complaints/grievances (if any), along with the Project's ability to address grievances in a timely and effective manner.

For transparency and effective stakeholder engagement, the Project will share several key reports on the Project website to adhere to IFC guidelines. These include the ESIA, which details potential impacts and mitigation measures regarding the Project; the SEP, which outlines the engagement process with stakeholders; the NTS, a simplified version of the ESIA for broader accessibility; and periodic Environmental and Social Performance Reports, which provide updates on how environmental and social impacts are managed. Additionally, Grievance Mechanism Reports should be shared, detailing how stakeholder grievances are received, addressed, and resolved, ensuring accountability and trust throughout the Project lifecycle.

To inform external stakeholders, an Environmental and Social Performance Report will be prepared and published on the Project website annually.

The annual performance report will include:

- Details of project progress,
- Status of ESAP implementation,
- Results of environmental monitoring data (waste, air, etc.),
- Resource use and product output,

- Human resource management (number of workers, female workers, local workers, etc.),
- Occupational health and safety,
- Stakeholder engagement,
- Meetings or other initiatives to engage with members of the public or public organisations during the reporting period,
- Information provided to the public and other stakeholders on environmental, social, or safety issues during the reporting period,
- Media coverage,
- Interaction with environmental or other community groups, NGOs, etc., and
- Grievances received by the project from members of the public or civil society organisations during the reporting period.

Reporting requirements are presented in Table 8.

Table 8: Reporting & Monitoring Time Frame

| Monitoring Type | Frequency | For | Content |
|------------------------|-----------|--------------------|--|
| Reporting | Monthly | Project management | Detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance |
| Reporting | Annually | Project management | Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance |
| Performance Monitoring | Biannual | Project management | Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of stakeholders/PAPs consultations/meetings |
| Impact Monitoring | Biannual | Project management | Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions |

12.0 ROLES AND RESPONSIBILITIES

ÇOK A.Ş./EPC Contractor has the overall responsibility in relation to implementation of the SEP. During the construction phase of the Project, the following roles and responsibilities will be implemented by ÇOK A.Ş./EPC Contractor. The roles and responsibilities will be updated for each Project phase where relevant.

Table 9: Roles and Responsibilities

| Role | Detailed Responsibilities |
|------------------------------|--|
| Construction Project Manager | <ul style="list-style-type: none"> ■ Monitoring the correct and effective implementation of the SEP |

| Role | Detailed Responsibilities |
|----------------------------------|--|
| | <ul style="list-style-type: none"> Overall responsible for ensuring the implementation of all environmental and social management plans Ensure the resource for the implementation of Sep and ESMS available Assist the Site Manager and CLOs when required |
| Site Manager | <ul style="list-style-type: none"> Ensure the implementation of all ESMS, including the SEP Ensure the applicable requirements of the SEP is being adopted to all workers Ensure the worker grievance mechanism is being announced and easily accessible to all workers Monitor the performance of the Contractors Monitor the worker grievances and assist Environmental and Social Manager to resolve the grievances when necessary Support CLOs when and/if corrective action of a grievance requires Site Manager's decision/action Monitor the monthly reports of the CLOs and the grievance records |
| Environmental and Social Manager | <ul style="list-style-type: none"> Ensure that the SEP is being adopted and implemented by all relevant departments Ensure the targeted engagement methods for stakeholders are followed by CLOs and monitor the engagement process Ensure all social documentations and engagement records are being kept accordingly by the relevant departments Monitor the efficiency of the grievance mechanism, including the corrective actions When necessary, take accountability and actions to address high level grievances with CLOs Ensure all documentation are well provided for the internal reports Ensure the SEP is being updated accordingly |
| Community Liaison Officers | <ul style="list-style-type: none"> Maintain ongoing relations with the targeted stakeholders and identify new stakeholders as the Project progress Provide Project related information on behalf of ÇOK. A.Ş./EPC Contractor Manage Grievance Mechanism Collect the public views about the Project and answer questions Ensure grievance mechanism is publicly announced and easy to access for all stakeholders |

| Role | Detailed Responsibilities |
|--|--|
| | <ul style="list-style-type: none"> ■ Ensure all grievances are received and addressed within the targeted deadlines. In case the resolution process exceeds the targeted deadline, ensure to communicate with the complainant about the ongoing process ■ Ensure targeted KPIs covered in the SEP are met within the given timeline ■ Keep all records of the stakeholder engagements (formal and/informal) within the data management system ■ When required, work with relative departments to resolve the grievances ■ Ensure all workers are aware of the internal and external grievances ■ Ensure that the SEP is being updated accordingly ■ Provide regular reporting and outcomes of the grievance mechanism ■ Keep records of the types of leaflets, brochures, newsletters prepared and distributed within the scope of Project purposes ■ Ensure employment opportunities are being promoted within the affected communities ■ Ensure all documentation are well provided for the internal reports ■ Ensure to provide all data kept to external auditors when requested. |
| All employees (direct and/or indirect) | <ul style="list-style-type: none"> ■ Adopt and implement all relative requirements covered in the SEP ■ To increase the efficiency of the grievance mechanism, ensure to use the formal grievance mechanism ■ In case complaint from external stakeholders received, ensure to forward the complaint and contact information of the complainant to the CLOs |
| Human Resources | <ul style="list-style-type: none"> ■ Ensure to adopt and implement the SEP for HR related activities ■ Ensure to provide training for the requirements covered in the SEP to all workers ■ Ensure the internal grievance mechanism is in place and efficiently in use for all workers ■ Ensure to keep all data kept from the internal grievances ■ When necessary, work with CLOs to close grievances related to worker behaviours or activities received from external stakeholders ■ Ensure all social management plans, procedures and policies are being trained to all workers ■ Ensure all documentation are well provided for the internal reports ■ Ensure to provide all data kept to external auditors when requested. |

13.0 LIABILITIES

This section will present the assigned experts for stakeholder engagement activities and the grievance mechanism as the Project. The SEP will be updated accordingly to reflect contact information and assigned experts for mentioned tasks.

As stated, the SEP is a live document and will reflect all updates and changes made for the Project.

| | | |
|-------------------------|-----------------------------------|--|
| Çanakkale Office | Site Office CLO: | |
|-------------------------|-----------------------------------|--|

14.0 REFERENCES

- EIA Report of Kınalı-Balıkesir Motorway prepared by AK-TEL Müh. Eğt. Trz. Gd. San. Tic. Ltd. Şti, 2016
- ESIA and SEP for Kınalı-Tekirdağ-Çanakkale-Savaştepe Motorway Project: Malkara-Çanakkale Section (including 1915 Çanakkale Bridge) consultations held by ERM GmbH (ERM) in March 2018
- IFC Performance Standards 2012: [https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance Standards](https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance_Standards)
- Equator Principles 2020
- <https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>

APPENDIX A

**Stakeholder Engagement Activity
Registration Template**

| No | Date | Project Party (EPC, Contractor, SPV etc.) conducted to engagement activity | Name of the stakeholder/participants (if provided) | Type of consultation | Aim of the consultation | Location of the consultation | Summary of the engagement activity |
|----|------|--|--|-------------------------|----------------------------|---------------------------------|---------------------------------------|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

APPENDIX B

ESIA Feedback Form

| ESIA Feedback Form | |
|---|--|
| Name-Surname <i>If you prefer or request not to disclose your identity to third parties without your consent, you can remain anonymous.</i> | |
| Address <i>Province/District/Settlement</i> | |
| Phone Number | |
| Date | |
| Concerns, expectations, questions, or complaints on the ESIA report | |

APPENDIX C

Sample Internal Grievance Form

| EMPLOYEE GRIEVANCE FORM | |
|--|--|
| To be filled out by the employee – Grievance holder | |
| Date of the grievance (complaint/opinion/suggestion/ request) | |
| Full Name of the employee <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i> | <input type="checkbox"/> I request non-disclosure of my identity information <input type="checkbox"/> I would like to submit an ANONYMOUS claim |
| Company Information | |
| Contact Information <i>Please mark how you wish to be contacted</i> | <input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By person:..... <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:..... <input type="checkbox"/> Other:..... |
| The grievance history | Occurred in <input type="checkbox"/> One-time event <input type="checkbox"/> Multiple times (...) <input type="checkbox"/> Continues/on-going |
| Detailed description of the Grievance: <i>Please add if any visual material available (photography video etc.)</i> | |
| Have you ever filed a grievance form on the same issue before? (Please specify) | |
| How can your complaints be resolved? Please provide your suggestions. | |

| | |
|--|---|
| Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives | |
| How was the comment received? <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> By mail <input type="checkbox"/> By grievance box number: (please include the box number) <input type="checkbox"/> Other (please describe) | |
| Grievance registration number and date: | Grievance Recorder: |
| Related Department: | |
| Closing the Grievances | |
| ASSESSMENT and PROPOSED ACTIONS: | |
| ACTIONS TAKEN: | |
| Grievance closure date: | |
| Grievance Holder First-Last Name and Signature | On Behalf of ÇOK A.Ş./ EPC Contractor Title-First Name-Surname and Signature |

APPENDIX D

Sample External Grievance Form

| Introductory Information | |
|---|--|
| Date of the grievance (complaint/opinion/suggestion/ request) | |
| Full Name of the stakeholder <i>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i> | <input type="checkbox"/> I request non-disclosure of my identity information <input type="checkbox"/> I would like to submit an ANONYMOUS claim |
| Province/District/Settlement <i>where the grievance occurred</i> | |
| Contact Information <i>Please mark how you wish to be contacted</i> | <input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By person:..... <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:..... <input type="checkbox"/> Other:..... |
| The grievance history | Occurred in <input type="checkbox"/> One-time event <input type="checkbox"/> Multiple times (...) <input type="checkbox"/> Continues/on-going |
| Information about the Grievance | |
| Detailed description of the Grievance: <i>Please add if any visual material available (photography video etc.)</i> | |
| Have you ever filed a grievance form on the same issue before? (Please specify) | |
| Do you know if any other locals that are experiencing the same issue? (Please provide the names and the contact details) | |

| | | |
|--|--|--|
| How can your complaints be resolved? Please provide your suggestions. | | |
| Please do not fill the following sections of the form. To be filled out by the CLO or Project Representatives | | |
| How was the comment received? <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> By mail <input type="checkbox"/> By grievance box number: (please include the box number) <input type="checkbox"/> Other (please describe) | | |
| Grievance registration number and date: | Grievance Recorder: | |
| Closing the Grievances | | |
| Detailed explanation related to actions taken, date, monitoring of the action etc.: | | |
| Grievance closure date: | | |
| Grievance Holder First-Last Name and Signature | On Behalf of ÇOK A.Ş./EPC Contractor Title-First Name-Surname and Signature | |

APPENDIX E

Grievance Closure Form

| Grievance Closure Form | |
|---|--|
| Date of the grievance (complaint/opinion/suggestion/ request) | |
| Grievance registration number and date: | |
| Province/District/Settlement <i>where the grievance occurred</i> | |
| Grievance Details | |
| Description of the Grievance: | |
| | |
| Actions Taken | |
| Detailed Explanation of Actions Taken: | |
| | |
| Date of Actions Taken: _____ | |
| Monitoring and Follow-up Actions: | |
| | |
| Grievance closure date: | |
| Outcome: | |
| | |
| Grievance Holder First-Last Name and Signature <i>Note: The grievance holder can remain anonymous if they prefer or request not to disclose their identity to the third parties without their consent</i> | On Behalf of ÇOK A.Ş./EPC Contractor Title-First Name-Surname and Signature |

APPENDIX F

Grievance Log / Database

| Grievance ID (Registration No) | Date | Company Representative Who Recorded the Grievance | Internal/External | Grievance Holder | Province/District/Village of the Grievance Holder or Company of the employee | Grievance Subject | Short description of the grievance | Related Department | Suggested Action | Action Taken | The date of the action taken | Grievance Status | Closure date of the grievances |
|--------------------------------------|------|--|-------------------|------------------|--|-------------------|---|-----------------------|---------------------|-----------------|---|------------------|--------------------------------------|
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |



wsp.com