

TURKIYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT

**639 kWp/596 kWe Solar Power Plant of
Odunpazarı Municipality**

Stakeholder Engagement Plan

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TABLE OF CONTENTS

| | |
|--|------------|
| TABLE OF CONTENTS | i |
| LIST OF TABLES | ii |
| LIST OF FIGURES | iii |
| LIST OF ABBREVIATIONS | iv |
| EXECUTIVE SUMMARY | 5 |
| 1. INTRODUCTION/PROJECT DESCRIPTION | 7 |
| 1.1. Objectives..... | 7 |
| 1.2. Components of subproject..... | 8 |
| 1.3. Location..... | 8 |
| 1.4. Area of Influence..... | 9 |
| 2. OBJECTIVE/ DESCRIPTION OF SEP | 15 |
| 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS | 16 |
| 3.1. Methodology..... | 16 |
| 3.2. Affected parties..... | 17 |
| 3.2. Other interested parties..... | 18 |
| 3.3. Disadvantaged/ vulnerable individuals or groups..... | 19 |
| 4. STAKEHOLDER ENGAGEMENT PROGRAM | 23 |
| 4.1. Summary of stakeholder engagement done during project preparation..... | 23 |
| 4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement..... | 23 |
| 4.3. Stakeholder engagement plan..... | 24 |
| 4.4. Reporting back to stakeholders..... | 28 |
| 5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES | 31 |
| 5.1. Project Implementation Unit (PIU)..... | 31 |
| 5.2. Resources..... | 31 |
| 5.3. Management functions and responsibilities..... | 31 |
| 6. GRIEVANCE MECHANISM | 33 |
| 6.1. Grievance Mechanism at National Level..... | 33 |
| 6.2. Subproject Level Grievance Mechanism..... | 34 |
| 6.3. Grievance Mechanism for Workers..... | 37 |
| 7. MONITORING AND REPORTING | 40 |
| 7.1. Summary of how SEP implementation will be monitored and reported..... | 40 |
| ANNEXES | 41 |
| Annex-A Sample Grievance Submission Form..... | 41 |
| Annex-B Sample Grievance Closure Form..... | 43 |
| Annex-C Grievance Database Form..... | 44 |
| Annex-D Sample Consultation Form (For Stakeholder Participation Meeting(s))..... | 45 |
| Annex-E Images of the interview..... | 46 |
| Annex-F Images of the Access Road..... | 48 |

LIST OF TABLES

| | |
|---|----|
| Table 1. Türkmentokat Neighborhood vulnerable and disadvantage groups | 17 |
| Table 2. Influence/Interest Table for Stakeholder Prioritization | 18 |
| Table 3. Stakeholder Engagement Plan | 23 |
| Table 4. Sample Table for Stakeholder Engagement Log | 26 |
| Table 5. Roles and Responsibilities | 29 |
| Table 6. Grievance Mechanism Flow Chart | 36 |

LIST OF FIGURES

| | |
|--|----|
| Figure 1. Subproject location..... | 9 |
| Figure 2. Subproject Area of Influence..... | 11 |
| Figure 3. Sub-project Site Access Road..... | 12 |
| Figure 4. Odunpazarı Municipality Grievance Mechanism..... | 34 |

LIST OF ABBREVIATIONS

| | |
|-------------|--|
| AoI | Area of influence |
| CIMER | Presidency's Communication Centre |
| EIA | Environmental Impact Assessment |
| EHS | Environmental Health and Safety |
| ESF | Environmental and Social Framework |
| ESMP | Environmental and Social Management Plan |
| ESMR | Environmental and Social Management Report |
| ESMS | Environmental and Social Management System |
| ESS | Environmental and Social Standard |
| ETL | Energy Transmission Line |
| E&S | Environmental and Social |
| FI | Financial Intermediary |
| GBV | Gender Based Violence |
| GM | Grievance Mechanism |
| GMCP | Grievance Mechanism Contact Person |
| IFC | International Finance Corporation |
| IFI | International Financial Institutions |
| ILBANK | İller Bank Inc. |
| MoEUCC | Ministry of Environment, Urbanization and Climate Change |
| MoM | Minutes of the Meeting |
| NGO | Non-Governmental Organizations |
| OHS | Occupational Health and Safety |
| PAP | Project Affected People |
| PMU | Project Management Unit |
| PIU | Project Implementation Unit |
| PUMREP | Turkiye Public and Municipal Renewable Energy Project |
| PPO | Public Social Organization |
| Project | PUMREP |
| RE | Renewable Energy |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| SCM | Stakeholder Consultation Meeting |
| Sub-Project | 639 kWp / 596 kWe Solar (Photovoltaic) Power Plant Project of Odunpazarı Municipality |
| SPP | Solar Power Plant |
| TurkStat | Turkish Statistical Institute |
| OG | Medium Voltage |
| WB | World Bank |
| WBG | Word Bank Group |
| YIMER | Foreigners Communication Centre |

EXECUTIVE SUMMARY

The Türkiye Public and Municipal Renewable Energy Project (PUMREP) aims to support the Government of Türkiye to scale-up renewable energy use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed Renewable Energy (RE) market in public facilities and help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S policies and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and subprojects financed through International Financial Institutions (IFIs).

The ESMS is aimed at ensuring systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S) risks and impacts of the projects and subprojects financed by the IFIs. This process should be implemented on an ongoing basis throughout their loan duration in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending IFIs (World Bank for the PUMREP). As a critical element of the ESMS, ILBANK has adopted and published¹ an E&S Policy applicable to all ILBANK projects and subprojects financed through IFIs.

The sub-project is categorized as of Moderate Risk as per the Risk Screening conducted under ILBANK ESMS and World Bank ESF. One of the tasks under the scope of the sub-project is the preparation of a Stakeholder Engagement Plan (SEP) in accordance with ILBANK's ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye. The subproject is planned to be built in Eskişehir Province Odunpazarı District Türkmentokat Neighborhood lot 2 of block 4695. The parcel which is 4695/2 has 52,800 m² area. 8,400 m² of the parcel area will be used for the solar power plant. The parcel belongs to the Odunpazarı Municipality since 25.06.2024.

SEP has been developed to ensure that project-affected parties, other interested groups, and vulnerable or disadvantaged stakeholders receive relevant, timely, and accessible information. The SEP establishes a structured approach to stakeholder engagement, enabling Odunpazarı Municipality to identify all stakeholders, understand how they are affected by the sub-project, and ensure its implementation is inclusive and community-oriented. By fostering and maintaining constructive and ongoing relationships, particularly with project-affected parties, SEP supports participatory and socially responsible sub-project execution. This ensures that stakeholder perspectives are incorporated into the sub-project's design and its environmental and social performance.

¹ <https://www.ilbank.gov.tr/sayfa/ilbank-environmental-and-social-policy>

SEP is therefore prepared to identify all stakeholders, inform them about the sub-project and its potential environmental and social risks and impacts, and their interest in the sub-project and to establish an effective communication with stakeholders and to define procedures and principles to improve participation. This Plan aims to create long-term relations between the sub-project and local communities based on mutual trust and transparency. In addition, it is aimed to reduce the negative effects that may arise from the sub-project and increase the positive effects.

This plan includes the legal framework, process of identifying stakeholders, explaining the stakeholder engagement program (comprising purpose and timing, proposed strategy for information disclosure, proposed strategy for consultation, future engagement activities. In addition, specific engagement and disclosure activities targeting vulnerable/disadvantaged groups/individuals identified under the SEP have been defined.

In order to obtain information about the current socio-economic structure of the neighborhood in the subproject area, as well as to determine the level of information about the sub- project, opinions and concerns about the sub-project, a sub-project site visit was organized by CA Engineering on 07.04.2025. Finally, a Grievance Monitoring Table is presented at the end of this SEP and the tools of monitoring activities to be carried out to evaluate the performance and effectiveness of the sub-project are suggested.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1. Objectives

The Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the “Project”) aims to support the Government of Türkiye to scale-up Renewable Energy (RE) use in the public sector by focusing on central government buildings and municipalities. The Project is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities’ energy bills. Odunpazarı Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP. The sub-project involves the establishment and operation of "Odunpazarı Municipality 639 kWp / 596 kWe Solar Power Plant, located within the borders of Türkmentokat Neighborhood in the Odunpazarı District of Eskişehir Province. Therefore, this plan is prepared in line with PUMREP’s Stakeholder Engagement Plan² which is a disclosed framework document on ILBANK’s web site in order to define the stakeholder engagement process including the grievance mechanism.

The sub-project is classified as “Moderate Risk Category” according to the E&S Risk Screening and Classification conducted by ILBANK in line with the ILBANK ESMS. One of the tasks under the scope of the Sub-project is the preparation of subproject specific Environmental and Social Management Plan Checklist (ESMP-Checklist) and Stakeholder Engagement Plan (SEP) in accordance with ILBANK’s ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

This SEP of Odunpazarı Municipality is an action plan which was prepared for the Odunpazarı Municipality 639 kWp/596 kWe Solar (Photovoltaic) Power Plant sub-project and sets out methods for effective communication and interaction with stakeholders.

The ultimate purpose of this SEP is to establish and maintain constructive dialogue with Odunpazarı Municipality and all stakeholder groups which are project affected people (PAP), other interested parties (OIP) and vulnerable/disadvantaged individuals or groups that are essential for the successful management of the Sub-project. Odunpazarı Municipality is fully committed to undertaking necessary engagement activities related to sub-projects in a manner that is consistent with international good practice as outlined in next sections.

SEP provides a roadmap for the Odunpazarı Municipality’s engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to environmental and social assessments, by identifying the stakeholders’ concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

² <https://www.ilbank.gov.tr/uidb/turkiye-kamu-ve-belediye-yenilenebilir-enerji-projesi/accordion/190>

1.2. Components of The Subproject

The sub-project includes the installation of "639 kWp / 596 kWp Solar Power Plant" in the lot 2 of block 4695 in Turkmentokat Neighborhood. There is a solar power plant belonging to Odunpazarı Municipality within the same parcel, and the energy produced within the scope of the sub-project will be transferred to the grid by connecting to the existing transformer. Therefore, Energy Transmission Line (ETL) will not be constructed. In addition, the existing stabilized road will be used as the sub-project access road within the scope of the sub-project. No new road will be constructed.

1.3. Location

The sub-project covers the establishment and operation of "639 kWp / 596 kWe Solar Power Plant" by Odunpazarı Municipality on lot 2 of block 4695 located within the borders of Türkmentokat Neighborhood, Odunpazarı District of Eskişehir Province. The parcel (4695/2) belongs to the Odunpazarı Municipality since 25.06.2024. There is no agricultural or animal husbandry activity area or commercial enterprise on the land. It has not been used as a commercial enterprise by the municipality or 3rd parties before. There is no area around the SPP land where agricultural and animal husbandry activities are carried out. However, there is a livestock farm located approximately 2,500 meters to the south. The sub-project area is shown in Figure 1.



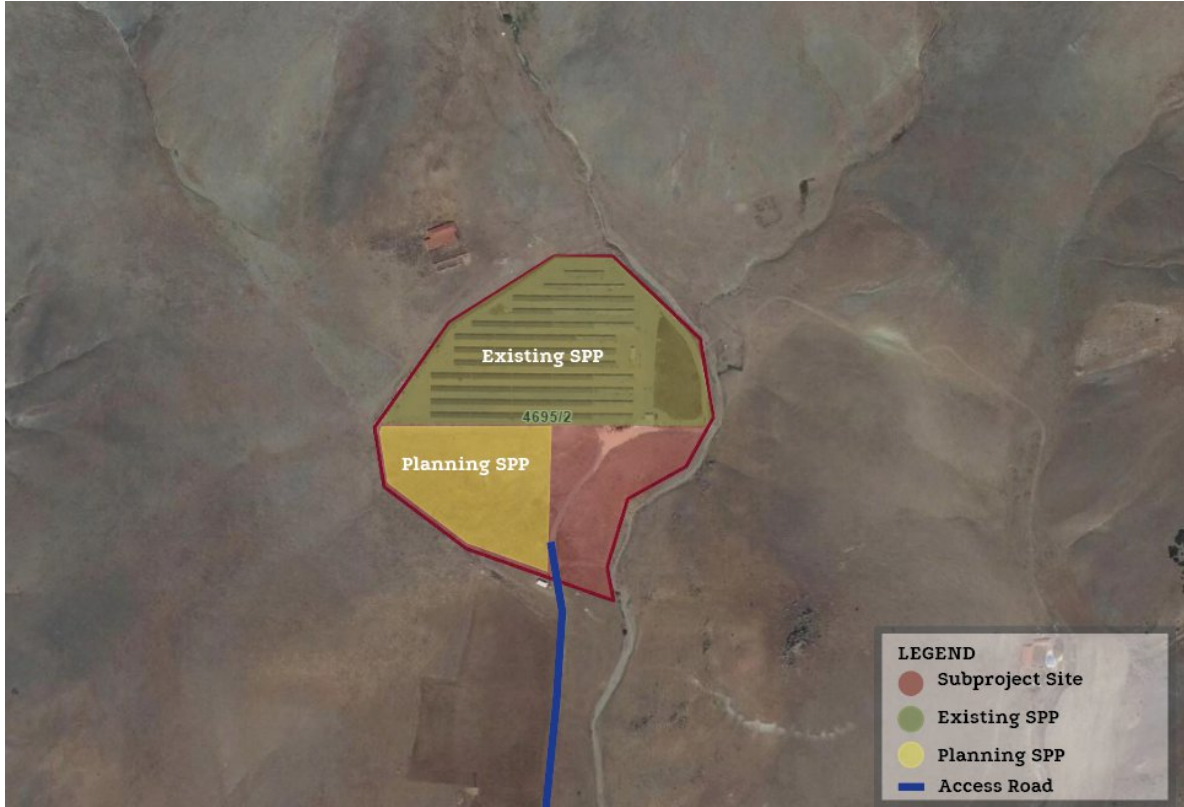


Figure 1. Subproject location

1.4. Area of Influence of the Subproject

The sub-project is located in the Türkmentokat Neighborhood, Odunpazarı District in Eskişehir Province. The subproject site is approximately 3,500 meters away from Türkmentokat neighborhood. Although there are no critical facilities such as schools as health centers, or fire stations along the route, residential buildings are present near the road. Detailed photographs of the access road have been published/shared via Annex-F. Although no vulnerable or disadvantaged households were formally identified through field visit and consultation with the mukhtar, the proximity of residences along the route has been taken into account in the Area of Influence (Aol) definition.

According to WB ESSs, “where the sub-project involves specifically identified physical elements, matters and facilities that are likely to create impacts, environmental and social risks and impacts shall be identified in the context of the sub-project’s Area of influence (Aol)”. Within the scope of sub-project activities, the impact area was determined as a result of interviews with local people and mukhtars during the site visit on 07.04.2025, based on components such as dust emissions, environmental noise, provision of local employment, local people’s opinions about the sub-project, etc. and considering the locations of vulnerable and disadvantaged groups.

According to the construction phase dust emissions and environmental noise calculations explained in detail in the ESMP-Checklist, the noise levels that will occur at the sub-project site are dampened after a distance of 50 m and remain below the 65 dBA noise level limit value

specified in Table 1 of Annex II of the "Environmental Noise Control Regulation" published in the Official Gazette dated 30.11.2022 and numbered 32029. The sub-project area of influence is shown in Figure 2.

The nearest sensitive receptors are the households located on the transportation route and the animal farm, which is also on the transportation route and 2500 meters away from the neighborhood.

Therefore, traffic, dust, and noise impacts are not only assessed for the sub-project site but also along the entire access route. These potential impacts are expected to remain minor; however, due to proximity to households, the route through the neighborhood has been included within the sub-project AoI. Therefore, the noise impacts of the subproject are not expected to exceed significant levels beyond a 50-meter radius. The Area of Influence has been determined by considering these two factors.

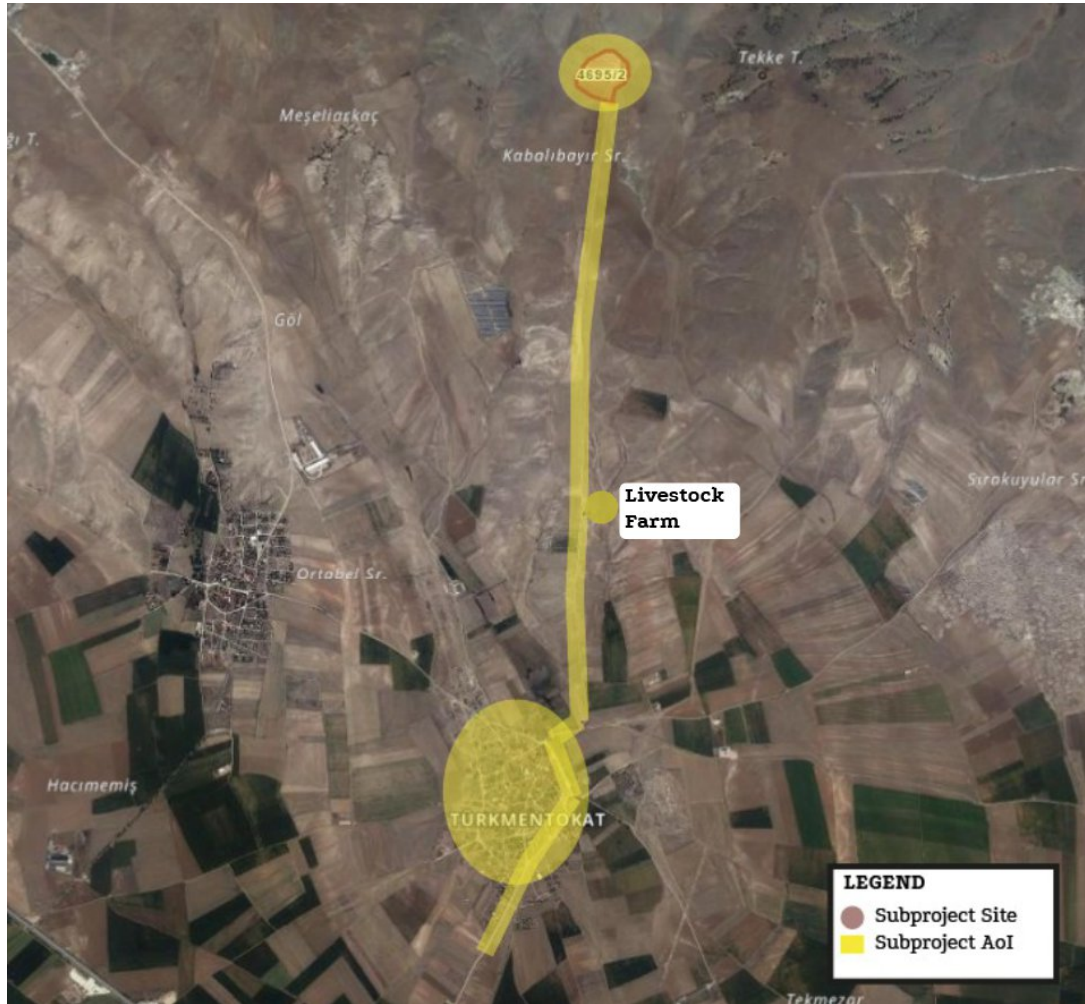
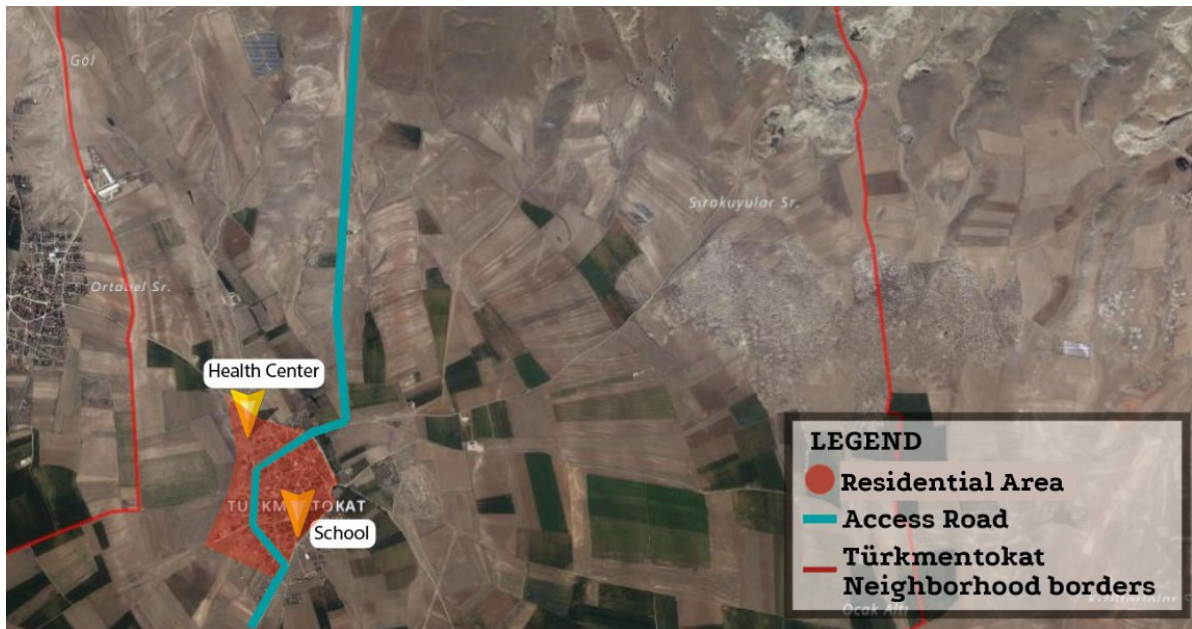
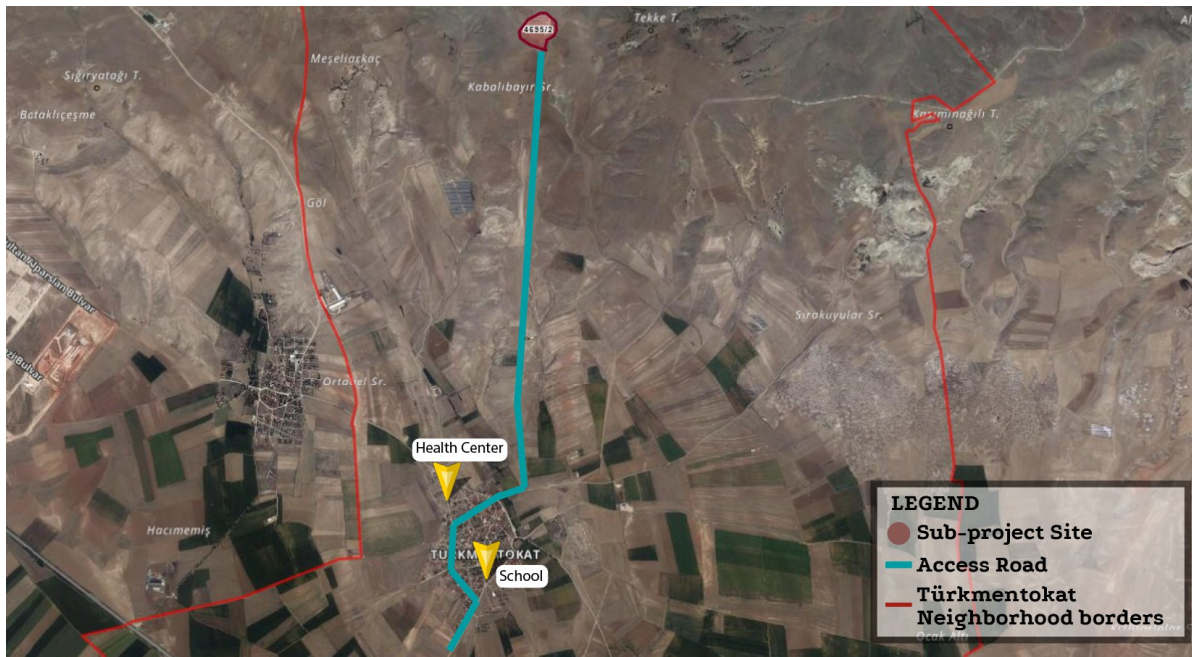


Figure 2. Subproject Area of Influence



2. OBJECTIVE/ DESCRIPTION OF SEP

This Stakeholder Engagement Plan has been formulated to ensure that project-affected parties, other interested parties and vulnerable /disadvantaged individuals/groups that constitute the “stakeholders” are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the sub- project and its impacts. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and grievance mechanism throughout the entire sub-project cycle. The SEP outlines how the Odunpazarı Municipality PIU (Project Implementation Unit) will communicate with stakeholders and includes a grievance mechanism by which people can raise concerns, provide feedback, or make complaints about subproject activities or related issues.

SEP increases awareness of the sub-project, identifies stakeholders’ views, ensures that their opinions and concerns are taken into consideration, and increases trust in the sub-project processes. This SEP aims to support Odunpazarı Municipality in identifying its stakeholders and fostering constructive relationships, particularly with those affected by the sub-project.

SEP promotes effective and inclusive engagement with affected parties throughout the subproject lifecycle, addressing potentially impactful issues. It ensures that information on the subproject and impacts are disclosed in a timely, understandable, and accessible manner. Additionally, the SEP provides affected parties with inclusive tools to voice concerns and grievances, enabling Odunpazarı Municipality to respond and manage these effectively. By creating a transparent and respectful environment, the SEP encourages the inclusion of diverse cultural norms and engagement capacities, fostering fair and open dialogue to address stakeholder concerns engagement.

SEP has been developed to comply with both national legal requirements and World Bank’s Environmental and Social Standard 10 (ESS10). This sub-project-specific SEP is a living document that will be regularly updated based on ongoing discussions and engagement with stakeholders, reflecting their views and input throughout the sub-project.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder engagement is an inclusive process that will be carried out throughout the sub-project life cycle. When professionally designed and implemented, it supports the establishment of strong, constructive and responsive relationships that are essential for the successful management of a sub-project's environmental and social risks.

The purpose of stakeholder identification is to identify which stakeholders may be directly or indirectly affected - positively or negatively - ("project affected parties") or have an interest in the Sub-project ("other interested parties"). Effective stakeholder engagement requires identifying who the stakeholders are, understanding their needs and expectations, and their priorities and goals for the sub-project. This information was then used to tailor the engagement to each type of stakeholder.

3.1. Methodology

To follow best practices in stakeholder engagement, the subproject will apply the following principles:

- **Openness and Life-cycle Approach:** Public consultations will be held throughout the entire subproject life cycle in an open and transparent way, ensuring that there is no outside influence, manipulation, or intimidation.
- **Informed Participation and Feedback:** Relevant information will be shared with all stakeholders in an accessible format; opportunities will be provided for communicating stakeholder feedback and for analysing and addressing comments and concerns.
- **Inclusiveness and Sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the subproject cycle. The participation process for the subprojects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and subproject implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable or disadvantaged individuals/groups that may be at risk of being left out of subproject benefits and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Subproject's subproject's stakeholder communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.

A site visits was conducted by the ÇA Engineering on April 7, 2025 and May 2, 2025. During the site visits, meetings were held with Odunpazarı Municipality officials, and information about the sub-project sites was gathered through on-site inspections. In this regard, meetings were conducted with the mukhtar of Türkmentokat neighborhood. On April 7, 2025 and May 2, 2025, during the site visits, consultations were held with nine (9) local residents living in the sub-project area of influence to gather their views and concerns. Additionally, a meeting was

conducted with the owner or representative of the nearby livestock facility to assess potential impacts and discuss possible mitigation measures. Visual documentation of the meetings is provided in Annex-E.

Based on the feedback obtained from the four residents interviewed, the majority of individuals residing in the area are aware of the sub-project and expressed their support, particularly for its potential to contribute to the development of renewable energy capacity. Residents were informed about the possible environmental impacts during the construction phase, such as dust and noise. In response, the subproject team explained that appropriate mitigation measures will be implemented. These include regular dust suppression activities and adjustments to working hours to minimize noise disturbances. Continuous monitoring will also be carried out throughout the construction phase.

It was also clarified that the sub-project will not cause any road closures or disruptions to infrastructure services during either the construction or operational phases. In addition, a consultation was conducted with the owner of the nearby livestock facility. While the owner did not express concerns about the subproject itself, they requested to be notified in advance in case of potential traffic congestion, given that the facility shares the same access road as the subproject site. Additionally, no negative feedback was received from the municipality or local residents regarding the road passing through the neighborhood settlement.

The stakeholder group was informed about the grievance mechanism established under the subproject. It was emphasized that any complaints or feedback during both construction and operation can be submitted through this mechanism. Contact information and channels for grievance submission will be publicly available and actively managed throughout the subproject lifecycle.

Discussions with the mukhtar included topics such as the demographic status of the neighborhoods, suggestions and concerns regarding the sub-project. Meetings also covered the socio-economic and demographic structures, as well as infrastructure services, of Türkmentokat neighborhood. Additionally, individual consultations were held with four residents of Türkmentokat neighborhood to gather their opinions, suggestions, and concerns about the sub-project. All data specified in the report were processed based on the mukhtar interviews conducted during the site visit and the information received from the local people.

As stated in WB ESS10, stakeholder definition is divided into three groups;

- Are affected or likely to be affected by the project (project-affected parties); and
- May have an interest in the project (other interested parties);
- Vulnerable/disadvantaged groups/individuals.

3.2. Affected parties

The term "project-affected parties" (PAP) refers to individuals or groups who are likely to be affected by the sub-project due to direct impacts or potential risks on their physical environment, health, safety, cultural practices.

The key PAP's who will be cooperated and consulted about and during the sub-project, including individuals, groups and communities are:

- Residents of Türkmentokat Neighborhood: Since the Turkmentokat neighborhood falls within the sub-project's area of Influence, its residents may experience direct and indirect impacts. These may include potential environmental impacts such as dust, noise, and increased traffic, as well as socio-economic changes related to local infrastructure, access to public services, and fluctuations in demand for essential facilities (e.g., healthcare centers, markets, commercial businesses). According to TURKSTAT 2024 data, Turkmentokat Neighborhood has a total population of 283 consisting of 164 men and 119 women.
- Workers to be employed for the subproject (including supply chain workers): Workers engaged in construction, operation, and maintenance activities will be directly involved in subproject-related tasks.

3.2. Other interested parties

Other interested parties (OIP) include individuals, groups and others who may have an interest in the sub-project because of their location, proximity to natural or other resources, or the sector or parties involved in the sub-project. This may include public administrations, local government officials, community leaders, media representatives and non-governmental organizations (NGOs). Non-Governmental Organizations (NGO) were identified as other interested parties due to their roles in facilitating communication across communities, shaping public opinion, and improving outreach to different social groups. Their involvement also contributes to addressing local concerns through direct engagement.

The following NOGs were identified and included in the stakeholder engagement process:

- Türkmentokat Village Irrigation Cooperative
- Eskişehir Civil Society Association
- Eskişehir Environmental Protection and Development Association
- Eskişehir Nature Enthusiasts Association
- Eskişehir Agriculture, Livestock and Beekeeping Solidarity Association

Among these, a face-to-face meeting was conducted with the Türkmentokat Village Irrigation Cooperative, located in Türkmentokat Neighborhood. Consultations with the remaining organizations were carried out via telephone, during which their views on the sub-project were obtained and documented. Türkmentokat Village Irrigation Cooperative has been closely interested in the sub-project as it actively follows the activities in the region. Other civil society organizations have expressed their interest in the project as their fields of activity include social and environmental sustainability elements. Governmental Bodies were determined as OIPs based on their regulatory, supervisory and coordination roles.

- Ministry of Environment, Urbanization and Climate Change, due to their environmental regulation, permitting, impact monitoring and supervision roles,
- Ministry of Labor and Social Security, with their supervisory roles on occupational safety, working conditions, local employment opportunities,

- Eskişehir Governorship and Central District Governorship, as provincial and district level coordination authorities, with their role of ensuring integration into sub-project management frameworks,
- Eskişehir Provincial Civil Society Relations Directorate, with its role of communication with local NGOs and Community Organizations, was determined as OIPs specific to the sub-project.

As Local Administrators;

- Eskişehir Metropolitan Municipality, as it has many authorities such as infrastructure, transportation, environmental management, fire department and zoning throughout the city
- Odunpazarı District Governorship in terms of the execution and coordination of public services at the district level

Mass communication channels at both the national and local levels have been identified as OIP due to their essential roles in disseminating information about the subproject to a broader audience, shaping public opinion and perception, making sub-project developments and updates accessible to non-technical stakeholders, ensuring transparency and increasing public awareness.

The National Press determined for the subproject;

- Anadolu Agency
- Demirören News Agency

Local Press;

- İstikbal Newspaper
- Sakarya Newspaper
- Şehir Newspaper

When research needs to be conducted within the scope of the subproject, universities are one of the key stakeholders. For this reason, Osmangazi University was determined as OIP.

Maintaining regular relationships with media stakeholders is sufficient to provide regular information at local and national level in Odunpazarı District. In all cases, the media plays an important role in informing the public and building public perception of the sub-project. Detailed information on other Interested Parties is provided in Table 3.

3.3. Disadvantaged/ vulnerable individuals or groups

Disadvantaged/Vulnerable individuals and/or groups are persons who may be disproportionately impacted or further disadvantaged by the subproject compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the subproject. Vulnerable/disadvantaged individuals or groups are those who often lack the means to express their concerns, may have difficulties in understanding the impacts of the sub-project, or face challenges in participating in the consultation process.

Vulnerable and disadvantaged individuals and/or groups residing in Türkmentokat Neighborhood, where the sub-project activities will be carried out, may be adversely affected due to their limited ability to express concerns, understand the interests of the sub-project, or access and comprehend project-related information. In Turkmentokat Neighborhood, vulnerable/disadvantaged individuals or groups are including people with chronic diseases, female headed households and people over 70 years of age.

Individuals with chronic diseases are more sensitive to environmental impacts, especially airborne dust and noise, than other people. Possible dust and noise emissions during the transportation of equipment to the site within the scope of subproject construction activities may worsen health conditions or restrict safe movement.

Individuals over the age of 70 may be more affected by environmental impacts due to their reduced mobility and need for stable living conditions.

Female-headed households have more limited access to economic resources, and both household responsibilities and economic responsibilities will limit time flexibility. Therefore, their participation in subproject activities is more limited than other individuals.

Details of vulnerable and disadvantage individuals/groups according to the information obtained from the mukhtar of Türkmentokat Neighborhood are given in Table 1.

Table 1. Türkmentokat Neighborhood vulnerable and disadvantage groups

| Vulnerable and Disadvantage Groups | Number of People |
|--|------------------|
| Chronic diseases | 17 |
| Over 70 years of age and living alone | 9 |
| Female-headed households | 2 |
| Total Vulnerable and Disadvantage Groups | 28 |

Source: Mukhtar Meetings, 2025.

According to the interviews conducted with mukhtar of Türkmentokat neighborhood on 07.04.2025 during the consultations carried out and the information received from the municipality staff, there are no refugee residing in the sub-project area.

There is no language spoken in the region other than Turkish. In order to inform them about stakeholder engagement activities, verbal information will be provided to women parent groups in Quran courses and primary and secondary schools in the neighborhood.

- **People with Chronic diseases:** People with chronic health conditions may have difficulty attending meetings due to mobility limitations or health concerns. Transportation will be arranged to ensure physical participation, and meeting locations will be selected with accessibility and comfort in mind.
- **Over 70 years of age and living alone:** Elderly people, especially those living alone, may have difficulty participating due to mobility or safety concerns. A shuttle will be

provided to take them to and from the stakeholder participation events. Meetings will also be held closer to their place of residence. This can be done in collaboration with neighborhood units and local NGOs to increase participation.

- **Female-headed households:** Women who lead household tasks may face barriers to participation due to care responsibilities or socioeconomic constraints. Meeting schedules will be arranged according to their availability (e.g. evenings or weekends) and alternative methods of feedback (e.g. telephone interviews, home visits) will be provided.

The stakeholders determined as a result of the interviews with the mukhtar of Türkmentokat neighborhood and local people, interviews with non-governmental organizations. Stakeholder groups within the scope of the subproject are as follows in Table 2.

Table 2. Influence/Interest Table for Stakeholder Prioritization

| Stakeholder Group | | Cause of Impact/Risk | Level of Interest | Level of Influence |
|---|--|---|-------------------|--------------------|
| Project Affected Parties | <ul style="list-style-type: none"> • Türkmentokat Neighborhood | Heavy vehicles used during the construction process may create temporary traffic congestion in the neighborhood, but other than that, the sub-project is not expected to have any permanent socio-economic or environmental impact on the neighborhood | High | Medium |
| | <ul style="list-style-type: none"> • Workers (including supply chain) to be employed for the sub-project activities | Potential risks related to working conditions, etc. | High | High |
| Vulnerable/disadvantaged individuals or groups | <ul style="list-style-type: none"> • People over 70 years of age; • People with chronic illnesses or in need of special care; • Female head of households | <ul style="list-style-type: none"> - <i>People Over 70 Years of Age</i> may have difficulty physically attending stakeholder participation meetings or information activities. - <i>People with Chronic Illnesses</i> may have difficulty participating in the stakeholder participation process. - <i>Female Head of Households</i> may have obstacles in terms of time and access to participating in information meetings due to family responsibilities. | High | Medium |

| | | | | |
|---------------------------------|---|--|--------|-----|
| Other Interested Parties | <p>NGOs:</p> <ul style="list-style-type: none"> • Türkmentokat Village Irrigation Cooperative • Eskişehir Civil Society Association • Eskişehir Environmental Protection and Development Association, Eskişehir Nature Lovers Association • Eskişehir Agriculture Animal Husbandry and Beekeeping Solidarity Association | <p>NGOs can submit suggestions on the environmental and social impacts of the sub-project depending on their field of activity; therefore, it is important to effectively manage the information and transparency processes.</p> | Medium | Low |
| | <ul style="list-style-type: none"> • Governmental Bodies <ul style="list-style-type: none"> ◦ Ministry of Environment, Urbanization and Climate Change ◦ Ministry of Labor and Social Security ◦ Eskişehir Governorship ◦ Eskişehir Provincial Directorate of Civil Society Relations Centre District Governorship ◦ Eskişehir Environment, City and Culture Presidency • Local administration <ul style="list-style-type: none"> ◦ Eskişehir Metropolitan Municipality ◦ Odunpazarı District Governorship • National Press <ul style="list-style-type: none"> ◦ Anadolu Agency ◦ Demirören News Agency • Local Press <ul style="list-style-type: none"> ◦ İstikbal Newspaper ◦ Sakarya Newspaper ◦ Şehir Newspaper • Osmangazi University | <p>A positive impact is expected with the energy generated from the sub-project. Government agencies may be involved in the permitting process, land acquisition process or in organizing consultations with communities.</p> | High | Low |

4. STAKEHOLDER ENGAGEMENT PROGRAM

The main objectives of the stakeholder engagement program and the planned schedule for the various stakeholder engagement activities are to define at what stages and at what intervals these activities will be carried out throughout the life of the sub-project. Information is provided on how the public will be made aware of future opportunities to review information and provide their views, if decisions about public meetings, locations and timing of meetings have not yet been made.

4.1. Summary of stakeholder engagement done during project preparation

In order to inform the public about the sub-project, a site visit was carried out on 07.04.2025 to engage with the local community, gather their opinions and suggestions, and provide detailed information about the subproject. As part of this process, an interview was conducted with Türkmentokat neighborhood mukhtar and Odunpazarı Municipality officials about the usage status of the sub-project site and the disadvantaged groups living in the region.

In addition, within the scope of the Stakeholder Engagement Plan, consultation meetings were held with Türkmentokat neighborhood residents (9 people) and the association president by CA Engineering on 07.04.2025 and 02.05.2025. In order to obtain general information about the socio-economic situation of Türkmentokat neighborhood and to learn about their knowledge levels about the sub-project, the mukhtar of a "Community Level Survey" form was filled out by the consultant company as a result of interviews with the mukhtar of Türkmentokat neighborhood.

During consultations with the local community, it was observed that they were aware of the potential environmental and social risks associated with the existing Odunpazarı Municipality SPP but did not have any concerns. They expressed their support for the new SPP Project and emphasized the importance of utilizing renewable energy sources for the development of the region and the country. Information was provided about the Odunpazarı Municipality grievance mechanism, which they can use to share any opinions or complaints during both the construction and operation phases of the sub-project.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Identifying and managing stakeholder needs accurately in sub-project is critically important. Key stakeholder needs include regular updates about the sub-project, stakeholders in decision-making processes, direct or indirect benefits from the sub-project, and an effective communication mechanism. Tools such as surveys and one-on-one interviews will be effectively utilized in information-sharing and engagement processes. Additionally, regular reporting, dashboards, and online communication tools will ensure transparent updates about sub-project progress. Community meetings and feedback mechanisms will help build trust in the sub-project while providing a better understanding of stakeholders' needs and expectations. Through these methods, stakeholder engagement in sub-project will be strengthened, making the projects more inclusive, sustainable, and effectively managed.

Stakeholders have been identified within the scope of the sub-project and consultations or key information meetings have been held with these stakeholders. Stakeholders identified in the region have been informed about the location, components and content of the sub-project.

This plan shows the nature and level of stakeholder interest in the project, how the engagement will be conducted, the frequency of engagement and the responsible unit of Odunpazarı Municipality, and the following matrix provides a tabular version of this program (See Table 4).

The responsible party/person should be determined by the representatives of Odunpazarı Municipality. The SEP will be implemented at the sub-project level. Consultation forms and full meeting minutes of those who participated in the consultations will be recorded, but will be made publicly available as an annex to the SEP. When the SEP is disclosed, relevant data containing personal data will be blurred, taking into account the Personal Data Protection Law.

All supporting documentation for stakeholder activities [newspaper notices, attendee list, full meeting minutes (as an annex), sample brochure] will be included in the SEP.

Stakeholder Consultation Meeting to be held within the scope of the sub-project will be held. A shuttle service will be provided to ensure the participation of vulnerable or disadvantaged individuals and/or groups by Odunpazarı Municipality.

4.3. Stakeholder engagement plan

The main objectives of the stakeholder engagement program are to provide early information, explanation and consultation on various sub-project documents and activities in order to establish a dialogue with project stakeholders from planning to implementation and operation.

Odunpazarı Municipality will ensure that the sub-project is communicated to all stakeholders and that meaningful engagement and consultation activities are carried out. The following information should be included when documenting the stakeholder engagement activities to be carried out within the scope of the sub-project:

- Date(s) and location(s) of the consultation(s) and related notification(s) (newspaper advertisements, screenshots of social media announcements, etc.)
- Participant details (as per the Personal Data Protection Law),
- Meeting schedule/program (as well as information on what was presented and by whom),
- Summary meeting minutes (comments, questions and responses from presenters),

Review of comments, agreed actions, issues requiring follow-up actions and activities, including clarification of how stakeholders were informed about decisions taken.

Odunpazarı Municipality will make the subproject E&S documents available in both Turkish and English on its website³. These documents can also be accessed at the Odunpazarı Municipality. Furthermore, subproject posters and information on the grievance mechanism will be displayed at local points, including the Mukhtar's Office in Türkmentokat Neighborhood.

³ <https://www.odunpazari.bel.tr/>

A Stakeholder Consultation Meeting will be organised to inform the public about the identified environmental and social risks of the subproject. The report will then be updated by adding the information about the meeting to SEP.

The proposed Stakeholder Engagement Schedule is provided in Table 3.

Table 3. Stakeholder Engagement Plan

| Project Stage | Estimated Date/Time Period | Topic of Consultation/ Message | Method Used | Target Stakeholders | Responsibilities |
|------------------|---|---|---|--|--|
| Pre-construction | At least 10 days before the construction phase begins | Information Statement <ul style="list-style-type: none"> General information about the purpose, stages, sub project and E&S impacts/risks Purpose, start date, duration and nature of land preparation, construction and operation activities Implementation of mitigation measures related to relevant social and environmental impacts/risks Grievance Mechanism Information (ESMP-Checklist and SEP) on Odunpazarı Municipality website for review | Stakeholder Consultation Meeting Face to face meetings Odunpazarı Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in work areas, mukhtar's office etc. | Residents of Türkmentokat neighborhood, Local communities, | <ul style="list-style-type: none"> Supervision Consultant, Odunpazarı Municipality, Sub-project Contractors |
| | | Employment and Supply Strategies <ul style="list-style-type: none"> Hiring employees Staff training Purchasing materials and services Grievance Mechanism | Stakeholder Consultation Meeting Odunpazarı Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in Mukhtar's office etc. | Local businesses, All local communities | |
| Construction | once a month | Information Statement <ul style="list-style-type: none"> Monitoring targets and activities to be carried out Monitoring targets and activities and regular reporting of monitoring results to stakeholders | Public Consultation Meeting Odunpazarı Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc. | Resident of Türkmentokat Neighborhood, Local communities, Local government, Local business | Supervision Consultant, Odunpazarı Municipality, Sub-project Contractors |
| | | Traffic and Transportation Management <ul style="list-style-type: none"> Road safety awareness, including safe passage through bypasses and connecting roads Types, number and frequency of vehicles to be used during construction | Face-to-face meetings, Depending on the demands of the stakeholder group, Posters to be hung in work areas, etc., Odunpazarı Municipality website | All communities living in the Turkmentokat Neighborhood Vulnerable/disadvantaged individuals/groups | |

| Project Stage | Estimated Date/Time Period | Topic of Consultation/ Message | Method Used | Target Stakeholders | Responsibilities |
|---------------|----------------------------|---|-------------|---------------------|------------------|
| | | <ul style="list-style-type: none"> • Collaboration with local communities and responsible authorities to improve signage, visibility and overall road safety, especially along roads near schools or other places where children are present, • Planning and timing of construction activities on roads, • Regarding training on traffic and pedestrian safety cooperating with local communities (e.g. school education campaigns) • Traffic measures and sub-project road use sharing with association president • Grievance Mechanism | | | |

4.4. Reporting back to stakeholders

Stakeholder engagement is a continuous process that begins before the development of the SEP and will continue throughout the life of the sub-project. Odunpazarı Municipality will actively communicate with the identified stakeholders throughout the life of the sub-project. In particular, Odunpazarı Municipality will solicit feedback from stakeholders on the E&S performance of the subproject and the implementation of the identified mitigation measures and the Grievance Mechanism. In the event of significant changes in the subproject that lead to risks and impacts that will particularly affect the parties affected by the subproject, Odunpazarı Municipality will provide information on these risks and impacts and consult with the parties affected by the sub-project on how to mitigate these risks and impacts.

Different information methods and tools can be used to increase the level of information for each of the targeted stakeholder groups. In particular, for public consultation meetings, the meeting place(s), time and date will be set and this information will be announced to the public at least ten (10) days before the meeting, ensuring that all community members are informed about the meeting to be held. This announcement will be made through various channels, including posters hung in mukhtars' offices, tea houses, and the municipality building, brochure distribution, and SMS via national and local mass media.

Inclusion of disadvantaged/vulnerable individuals/groups:

Special efforts will be made to ensure that vulnerable and disadvantaged individuals/groups can access information and participate in consultation processes. Measures include:

- Providing materials in large fonts and Braille,
- Holding meetings in accessible venues or providing transportation,
- Small group consultations with necessary support (e.g. sign language interpreter),
- Coordinating with relevant NGOs ,

Scheduling meetings outside working hours or providing alternative feedback channels (web pages, social media, brochures, face-to-face meetings). For those who are unable to attend despite the scheduled time, brochures, an active web page, social media, face-to-face individual meetings, etc. can be organized.

Throughout all stages of the sub-project, comments collected through the website, grievance mechanism, and all stakeholder engagement activities such as public and/or individual meetings will be subject to evaluation and review by the relevant responsible personnel such as the GM Contact Person (GMCP) and the Public Relations Expert to be assigned by the Project Management Unit (PMU).

The contractor and Odunpazarı Municipality officials will be in regular contact. Face-to-face meetings will be held when necessary, and the contractor and Odunpazarı Municipality will meet periodically (monthly).

Depending on their content, comments will be evaluated and reviewed both within the PMU and by the relevant responsible personnel of the contractor(s).

Odunpazarı Municipality will notify Turkmentokat Neighborhood's mukhtar's office located in the impact area two days in advance of any possible temporary road closures caused by construction works. Similarly, Odunpazarı Municipality will inform the affected local people of the future works in Odunpazarı Municipality and Odunpazarı District Governorship buildings and/or on the notice platforms two days in advance.

Odunpazarı Municipality will be responsible for engagement with stakeholders as an on-going process throughout the life of the sub-project. Stakeholder logs will also be filled out for engagement activities (Table 4).

Table 4. Sample Table for Stakeholder Engagement Log

| Sub-Project Phase | Date and Location | Method used | Purpose of Activity | Target Stakeholders | Meeting Summary/ Key Issues Raised | Follow-up Actions | Information Shared/Documents Disclosed and Consulted |
|-------------------|-------------------|-------------|---------------------|---------------------|------------------------------------|-------------------|--|
| | | | | | | | |

A summary of the implementation of the grievance mechanism will be published annually on Odunpazarı Municipality's website⁴ after removing the identity information of the persons to protect their identity.

All stakeholders will be able to share their opinions and grievances via a range of options such as Odunpazarı Municipality's website, letters, and face to face meetings with the implementation of the SEP.

The grievance mechanism will be advertised and announced to affected stakeholders on Odunpazarı Municipality's website so that they are aware of the process, know they have the right to submit a grievance, and understand how the mechanism will work and how their grievance will be addressed.

⁴ <https://www.odunpazari.bel.tr/>

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

PIU will be established within Odunpazarı Municipality and will consist of Odunpazarı Municipality personnel. The duties and responsibilities of PIU are explained in Table 5.

The PIU team will consist of a project coordinator responsible for overall subproject management, interdepartmental coordination and reporting to relevant authorities; a technical expert-engineer responsible for supervising technical implementation and ensuring that construction and infrastructure works comply with standards; an E&S expert responsible for supervising the implementation of environmental and social protection measures, including stakeholder participation and complaints management; a procurement and finance officer to manage procurement procedures and oversee the use of financial resources in accordance with the project budget; and a communication officer who coordinates communication with stakeholders and ensures timely transfer of project-related information to relevant parties.

A sufficient budget will be allocated for communication and grievance mechanism to be established with stakeholders. The budget is included in the sub-project budget.

5.2. Resources

Odunpazarı Municipality is ultimately responsible for the environmental and social performance of the entire sub-project, including the performance of its own contractors and subcontractors. A Project Implementation Unit (PIU) will be established to carry out operational and administrative tasks. The PIU staff will be Odunpazarı Municipality's own staff.

The PIU will be primarily responsible for coordinating stakeholder engagement activities. The collection of grievances, questions and feedback will be the direct responsibility of the PIU's GM contact (GMCP).

The resources to be provided by Odunpazarı Municipality are as follows:

- A sub-project-specific site on the Odunpazarı Municipality's official website,
- A database for grievances,
- Stakeholder engagement records,
- Printed documents (guides, brochures, posters, etc.) to be used in accordance with the SEP requirements.

5.3. Management functions and responsibilities

Odunpazarı Municipality/PIU will be the main party responsible for the implementation of the SEP and coordination with contractors, implementation, monitoring and reporting. Detailed

roles and responsibilities regarding the stakeholder engagement of the sub-project are provided in Table 5.

Table 5. Roles and Responsibilities

| Responsible Entity | Roles and Responsibilities |
|--------------------------------|--|
| PIU of Odunpazarı Municipality | <ul style="list-style-type: none"> • Planning and implementation of the SEP; • Leading stakeholder engagement activities in close collaboration with the ILBANK; • Management and resolution of grievances; • Consultation on specific SEP activities; • Announcing the important construction activities; • Reporting on implementation of SEP activities to ILBANK; • Proper implementation of the grievance mechanism defined in the SEP, and • Executing defined grievance mechanism in the SEP properly and informing ILBANK about the overall implementation status. |
| GMCP | <ul style="list-style-type: none"> • Act as a focal point for the GM in the PIU • Keep records and monitor sub-project-related grievances • Manage and coordinate the resolution process of sub-project related grievances • Review grievance records for relevant non-compliance issues or recurring issues related to stakeholder engagement and other sub-project activities • Coordinate and monitor PIU contacts at the contractor level • Collect sub-project related grievances from all different parties • Inform PIU and management about the resolution process • Prepare compiled PIU reports on the sub-project • Monitor contractors' grievance records and grievance resolution process and report to PIU in monthly progress reports • Maintain communication with PIU to respond/resolve grievances |
| Supervision Consultant | <ul style="list-style-type: none"> • Ensure that the subproject complies with the methodology and other requirements specified in the E&S Documents during the implementation of sub-projects, • Recording and monitoring the resolution of grievances from contractors and reporting them to Odunpazarı Municipality (PIU) in the monthly progress reports, • |
| Contractor | <ul style="list-style-type: none"> • Recording and monitoring resolution of contractor grievances and reporting them to PIUs in monthly progress reports, • Maintaining communication with PIU GM Focal Point to follow up on grievances, • Organizing and conducting Stakeholder Consultation Meetings and related events for public information sharing, • Informing ILBANK (PMU) and Odunpazarı Municipality on all matters related to their relations with stakeholders, • Informing local communities on all environmental and social issues (e.g. noise, vibration, water quality monitoring, community health and safety, etc.) • Developing and implementing a grievance mechanism for both the E&S performance of the project and the workforce, including subcontractors, prior to the commencement of works in accordance Submits monthly Environmental and Social Monitoring Reports (ESMRs) to Odunpazarı Municipality, |

6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of the public grievance mechanism and the workers grievance mechanism is to provide access to a grievance resolution procedure for Subproject affected people, including communities and Subproject workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between SupProject worker's, local communities, and other stakeholders.

In the Sub-Project Level Grievance Mechanism, Public Grievance Mechanism and Worker Grievance Mechanism, grievances will be submitted in Turkish through Turkish forms. In addition, if a stakeholder who does not speak Turkish but have grievances about the environmental and social performance of the subproject or, necessary language support will be immediately provided by Odunpazarı Municipality.

The structured GM will ensure that grievances associated with the Sub-Project are addressed through a transparent and impartial process. The public will be informed about the GM through the disclosure and consultation of the SEP and through the stakeholder engagement activities to be conducted throughout the life of the subproject.

6.1. Grievance Mechanism at National Level

The intake channels for the existing national level GMs are provided below:

Presidency's Communication Centre (CIMER): The Presidency's Communication Centre (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **CIMER Website:** www.cimer.gov.tr
- **CIMER Call Centre:** 150
- **CIMER Phone number:** +90 312 525 55 55
- **CIMER Fax number:** +90 0312 473 64 94
- **Address for Official Letter:** Republic of Türkiye, Directorate of Communications Kızıllırmak Mah. Mevlana Bulvarı No:144 Çankaya/Ankara
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the community relations desks** at governorates, ministries and district governorates

The Foreigners Communication Centre (YIMER): The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **YIMER Website:** www.yimer.gov.tr
- **YIMER Call Centre:** 157
- **YIMER Phone number:** +90 312 5157 11 22

- **YIMER Fax number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No:4 Yenimahalle/Ankara
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

ILBANK Grievance Mechanism: ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Sub-project. Complainants may - if they wish - submit their grievances to ILBANK as a higher authority through the following communication channels:

- **ILBANK Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **ILBANK E-mail:** uidbbilgi@ilbank.gov.tr
- **ILBANK Phone number:** +90 312-508 79 79 / 508 79 80
- **ILBANK Address for Petition Service:** ILBANK Department of Financial Institutions and Investor Relations, GM Team (letters must be marked as personal or confidential)
Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the sub-project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

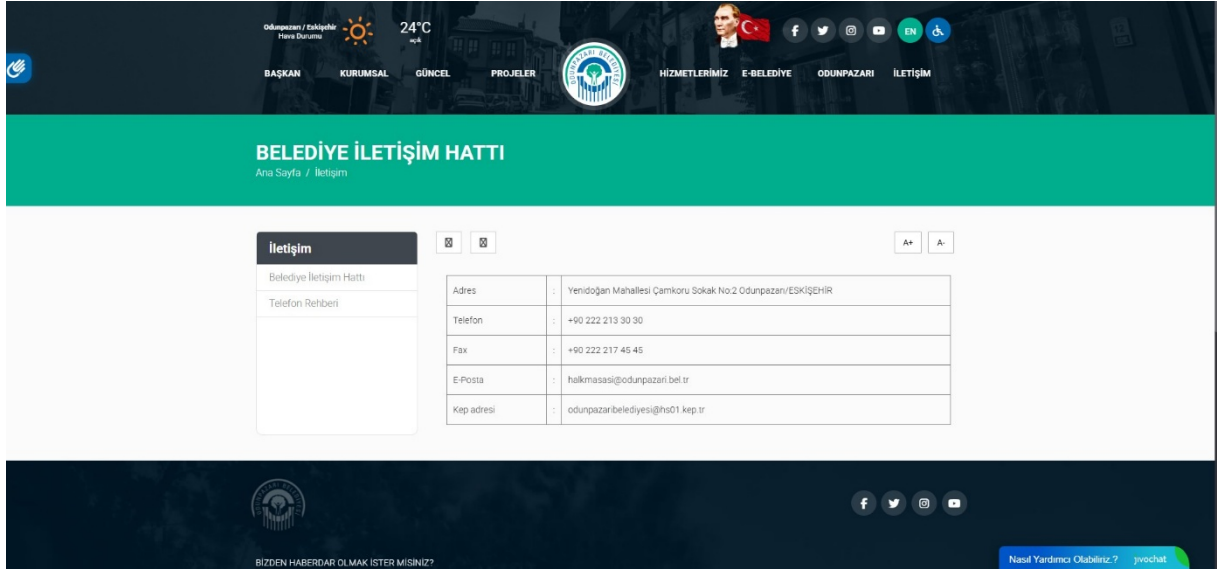
6.2. Subproject Level Grievance Mechanism

As part of the stakeholder engagement, information and consultation process, grievance mechanism stakeholders are required to be informed about project level grievance mechanism. The purpose of the grievance mechanism is to provide channels free from manipulation, coercion and intimidation through which local community members can submit their demands, concerns and complaints regarding the sub-project and its impacts. Responding to and resolving complaints in a timely, proactive, impartial, effective and efficient manner is essential according to international standards and requirements regarding stakeholder engagement. In particular, it provides a transparent and reliable process for fair and sustainable results. In this way, mutual trust and cooperation can be developed between the sub-project stakeholders and Odunpazarı Municipality through corrective actions. The main components of a successful grievance mechanism include the principles of anonymity, confidentiality and transparency.

Odunpazarı Municipality handles public grievances and views through its website and complaint hotlines. This municipal GM system was established to receive grievances and requests from local citizens and intended to produce possible solutions within Odunpazarı Municipality for reported concerns. Odunpazarı Municipality website includes a communication page, which is the mechanism where grievances/requests regarding Odunpazarı Municipality activities are submitted (see Figure 4). In addition, many sections of the homepage of Odunpazarı Municipality website include information about social media accounts and

telephone numbers (such as the Alo 153/444 26 00 line/Belediye İletişim Hattı) to which grievances can be submitted.

- **Odunpazarı Municipality's Website:** <https://www.odunpazarı.bel.tr/iletisim/belediye-iletisim-hatti>
- **Odunpazarı Municipality's Call Centre (hotline):** ALO 153/ 444 26 00
- **Odunpazarı Municipality's Address:** Yenidoğan Neighborhood Çamkoru Street No:2 Odunpazarı/ESKİŞEHİR



| İletişim | |
|------------|---|
| Adres | Yenidoğan Mahallesi Çamkoru Sokak No:2 Odunpazarı/ESKİŞEHİR |
| Telefon | +90 222 213 30 30 |
| Fax | +90 222 217 45 45 |
| E-Posta | halkmasasi@odunpazarı.bel.tr |
| Kep adresi | odunpazarıbelediyesi@hs01.kep.tr |

Figure 4. Odunpazarı Municipality Grievance Mechanism

Apart from the ILBANK Grievance Mechanism and in addition to all existing GMs at national level, a grievance mechanism will be established by Odunpazarı Municipality in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities as sub-project level. Grievance Mechanism (GM) as per WB will be implemented by Odunpazarı Municipality throughout the lifetime of the sub-project including pre-construction, construction, and operation phases. Odunpazarı Municipality PIU and construction contractor will be accessible for the stakeholders and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team. The personnel to be appointed by Odunpazarı Municipality will record the grievances and requests coming from different channels in a single established system and will provide solutions within the time and application framework determined in as described above, within the scope of this subproject, there will be different levels of GMs to be operationalized by different institutions and subproject parties. All GMs to be utilized in this subproject will follow the process flow. Odunpazarı Municipality personnel will record all grievances received through different GM channels presented in this SEP (including all verbal and written grievances even through the grievance boxes installed in the municipal building and any stakeholder engagement event/meeting) in their GM log.

The grievances, requests, suggestions and opinions of the public will be recorded through the GM contact person (GMCP) to be assigned by Odunpazarı Municipality. All grievances are

examined to be classified according to whether they are real or not and whether they are related to sub-project activities. If a grievance is deemed unsuitable for investigation because it is not genuine or not related to sub-project activities, the complainant will be provided with an explanation as to why the grievance could not be followed up. Grievances received within Odunpazarı Municipality are evaluated and forwarded to the relevant units. Appropriate grievances are responded to according to the sub-projects social and environmental requirements defined in SEP.

Any grievances received by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to Odunpazarı Municipality's call center and Odunpazarı Municipality's subproject level grievance mechanism. Samples of grievance form and grievance closure and consultation form prepared for use within the scope of the Sub-Project are given in Annex-A, Annex-B and Annex-D respectively.

All grievances submitted through phone calls, emails, face-to-face meetings, or the Website are recorded upon receipt. Within two (2) business days, the Grievance Mechanism Contact Person (GMCP) shall notify the complainant that the grievance has been received and is under evaluation.

The complainant shall be contacted within ten (10) business days to explain the process and provide an initial response. If needed, consultations with relevant stakeholders will be held, and the complainant will be informed about the methodology used to address the grievance.

Each grievance will be handled with diligence, fairness, and impartiality. If the proposed solution is accepted by the complainant, corrective actions will be taken within 15 business days. The grievance will be closed following implementation, and the complainant will be notified through a third and final communication. All related documentation (Grievance Form, Closure Form, etc.) will be archived.

All grievances other than urgent grievances will be resolved within 15 days. In case of delays, the reasons will be documented and reported. Grievances from contractors or subcontractors will be reported to GMCP by their E&S Specialist and entered into the Grievance Registry and Database on the same day, where they will be accessible to the PMU. The Grievance Tracking Table will include complainant details, dates, communication method, grievance status (open/reviewed/closed/rejected), and relevant explanations.

Throughout the process, all communications will be documented using Consultation Forms (see Annex-D). If a grievance is rejected or not resolved satisfactorily, it will be reconsidered, and revised decisions may be proposed. The Project Implementation Units (PIUs) are responsible for consolidating, monitoring, and reporting grievance data monthly.

Management of Sexual Exploitation and Abuse/Sexual Harassment issues:

Since there are special procedures/principles for handling sensitive content grievances (i.e. sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in Sub-Project areas), these grievances will be handled centrally at İLBANK, not at Odunpazarı Municipality's or Contractor level.

İLBANK's GM procedure has been prepared in accordance with WB ESF/ESS10 and it also complies with the World Bank's environmental and social standards. In case a sensitive complaint is received by the Contractor or Odunpazarı Municipality, they will be responsible for conveying the issue directly to the İLBANK GM focal point. However, Contractor and

Odunpazarı Municipality should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

Odunpazarı Municipality official who will manage the Grievance Mechanism will be knowledgeable about the guidelines prepared by the World Bank to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in negative reactions from the community. It is highly important that the victims raising grievances involving these issues can do so anonymously. In addition, the authorities handling the grievances should address such issues within confidentiality and with an unbiased approach and to ensure this, such grievances should be handled through a separate procedure

All stakeholders who have lodged a grievance may request that their applications be assessed in confidentiality. Odunpazarı Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

6.3. Grievance Mechanism for Workers

The GM for employees (applicable to both Odunpazarı Municipality personnel and contractor and subcontractor employees) has been established in accordance with WB ESS2. The implementation of the GM for employees will be ensured throughout the financing life cycle of the sub-project. PIU requests contractors to develop and implement a grievance mechanism for the workforce, including sub-contractors, before starting work. Sub-contractors will prepare labor management procedures that will include a detailed description of the grievance mechanism for employees.

Employees are informed about employee rights, basic occupational health and safety, the grievance mechanism and its operation at the time they start work. An up-to-date list of contact points is available in employee handbooks and/or bulletin boards. All processes related to the grievance mechanism are conveyed in a language that employees can understand.

When employees detect a hazard or risk for which no precautions have been taken regarding occupational health and safety, they inform the employee representative, occupational safety specialist and/or occupational physician selected by the employees about this hazard or risk. The employee representative shall forward the details of the hazard and risk to the occupational health and safety board, if any, or to the employer/employer's representative, and request an evaluation. If the problem is not resolved, all legal rights are reserved by applying to the contractor/subcontractor level GM contact persons through the grievance boxes located at the workplaces. Requests regarding employee rights and occupational health and safety are collected in grievance boxes placed in areas that employees can easily access.

The collected grievances and suggestions are carried out in accordance with the periods determined in the process of the grievance mechanism.

After the applications are evaluated, if there is an imminent, urgent and vital danger, a notification can be made directly to the Labor Life Communication Center, ALO 170 line or the Provincial Labor and Employment Institutions Directorates operating in the province. Upon receipt of the requests, the workflow grievance mechanism is carried out in accordance with the workflow chart.

The Odunpazarı Municipality/PIU Team will be ready to handle grievances regarding working conditions. The Odunpazarı Municipality/PIU Team will evaluate grievances and suggest solutions for direct and contracted employees using this internal GM, which all sub-project employees can easily access.

Grievance mechanism operation diagram details are given in Table 6.

Table 6. Grievance Mechanism Flow Chart

| Grievance Process | Requirement / Action |
|-------------------------------------|--|
| Submission of a grievance | Receiving the grievance by any communication channel explained above. (At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2 days after receiving of the grievance. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the project sites, the grievance will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”) |
| Registration of grievance | Registering/recording through making an entry in the sample grievance register table. All the grievances will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met. |
| Forwarding of grievance | The grievance is forwarded to relevant persons (site manager on construction sites and experts of the PIU) responsible for handling the grievance in not later than three working days upon receiving the grievance (except for any emergent grievance, which would be handled as appropriate). |
| Evaluation of a grievance | Evaluating the grievances within 10 working days and determining whether the grievance meets the admissibility criteria. If the grievance is not valid, providing relevant explanation to the complainant. |
| Response for a grievance | <p>If the grievance is valid, identifying and taking corrective measures for resolving the grievance in not later than 15 working days upon receiving.</p> <p>All comments and grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.</p> <p>At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the Odunpazarı Municipality website, so that anonymous complainants is informed about their grievance and the results.</p> |
| Recording the result of a grievance | Recording the result of the grievance in register table. |

| Grievance Process | Requirement / Action |
|-------------------|--|
| Right to Appeal | <p>If the grievance cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follow:</p> <ul style="list-style-type: none"> • Civil Courts of First Instance • Administrative Courts • Commercial Courts of First Instance • Labor Courts, and • Ombudsman <p>(https://ebasvuru.ombudsman.gov.tr/)</p> |

7. MONITORING AND REPORTING

7.1. Summary of how SEP implementation will be monitored and reported

It is the responsibility of Odunpazarı Municipality to ensure that the SEP is fully integrated and implemented in all sub-project activities. All stakeholders will be consulted and will be able to use the GM throughout the sub-project lifecycle. On the other hand, the SEP will form part of all tender documents related to the physical works within the scope of the sub-project.


As part of the World Bank ESF requirements, the draft ESMP and draft SEP will be made public when approved for public disclosure and approved by İLBANK, and the disclosure will be the responsibility of the sub-project Implementers and the consultant firm Odunpazarı Municipality. Odunpazarı Municipality will ensure that the SEP is published in hard copy and on its website. Similarly, several copies of all prepared environmental and social documents will be available locally in Odunpazarı Municipality, where affected groups such as the Mukhtar offices operating in the Odunpazarı District of Eskişehir Province and local NGOs can easily access.

The SEP is a dynamic document and will be reviewed, updated and approved by İLBANK when necessary (e.g. changes in the design of sub-project components according to Environmental and Social Monitoring Reports (ESMRs), stakeholders' requests/grievances regarding the sub-project. Implementation of the SEP throughout the implementation of the sub-project, elimination of non-conformities, etc.). Odunpazarı Municipality will be responsible for making a statement through communication channels for each updated version of the SEP.

Odunpazarı Municipality will monitor the sub-project throughout its lifetime considering the stakeholder engagement process. The approved SEP will be reviewed biannually and updated if required according to the project improvements and the unexpected public reactions. The GM established by the Odunpazarı Municipality will be used effectively and the statistical summary of the outputs of GM will be reported to İLBANK together with all the requests received, resolved and unresolved, Grievance Register, Grievance Monitoring Table and Environmental and Social Monitoring Reports (ESMRs) on a monthly basis. With monthly reporting, total number of grievances, monthly number of grievances, distribution of grievances by subject, gender, grievances answered within 1 days, grievances resolved within 30 days, list etc. is necessary.


ANNEXES

Annex-A Sample Grievance Submission Form

| | | |
|--|--|---|
|  | ODUNPAZARI MUNICIPALITY SOLAR POWER PLANT PROJECT | |
| | GRIEVANCE FORM | |
| Person Filling Out the Form: | Date and time: | |
| Interview Agenda: | Reference No: Odunpazari Municipality-Project Code-0001-2. | |
| 1. INFORMATION ABOUT THE COMPLAINANT | | |
| Name surname: <i>If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.</i> | How received the Grievance: | |
| TC Identification number: | Telephone / Toll Free Li <input type="checkbox"/> | |
| Telephone: | Face to Face Meeting <input type="checkbox"/> | |
| Address: | Website / Email <input type="checkbox"/> | |
| Email: | Other (Explain) <input type="checkbox"/> | |
| Stakeholder Type | | |
| Public <input type="checkbox"/> | PAP <input type="checkbox"/> | Private Enterprise <input type="checkbox"/> |
| Trade Association <input type="checkbox"/> | NGO <input type="checkbox"/> | |
| Interest Group <input type="checkbox"/> | Industrial Association <input type="checkbox"/> | Labor Union <input type="checkbox"/> |
| Media <input type="checkbox"/> | University <input type="checkbox"/> | |
| 2. DETAILED INFORMATION ABOUT THE GRIEVANCE | | |
| Description of the grievance: | | |
| Solution method requested by the complainant | | |

| | |
|--|---|
| Registrant Name Surname/Signature | Complainant Name Surname/Signature |
|--|---|


Annex-B Sample Grievance Closure Form

| | |
|--|---|
|  | ODUNPAZARI MUNICIPALITY |
| | SOLAR POWER PLANT PROJECT |
| | GRIEVANCE CLOSE OUT FORM |
| Reference form: | |
| 1. DETERMINATION OF CORRECTIVE ACTION | |
| 1 | |
| 2 | <input type="checkbox"/> |
| 3 | <input type="checkbox"/> |
| 4 | <input type="checkbox"/> |
| 5 | <input type="checkbox"/> |
| 2. CLOSE OUT THE GRIEVANCE | |
| <i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i> | |
| Name Surname / Signature of the Person Closing the Grievance/Date | Name Surname / Signature of Complainant/Date |

Annex-C Grievance Database Form

[illegible]

Annex-D Sample Consultation Form (For Stakeholder Participation Meeting(s))

| | | |
|---|--|---|
|  | ODUNPAZARI MUNICIPALITY SOLAR POWER PLANT PROJECT | |
| | CONSULTATION FORM | |
| Person Filling Out the Form: | | Date timeand place: |
| Meeting Agenda: | | Interview Registration Number: |
| 1. INTERVIEW INFORMATION | | |
| Interviewed Institution: | | Form of Communication |
| Name and Surname of the Interviewee: | | Telephone / Toll Free Li <input type="checkbox"/> |
| Telephone: | | Face to Face Meeting <input type="checkbox"/> |
| Address: | | Website / Email <input type="checkbox"/> |
| Email: | | Other (Explain) <input type="checkbox"/> |
| Stakeholder Type | | |
| State agency <input type="checkbox"/> | PEB <input type="checkbox"/> | Private Enterprise <input type="checkbox"/> |
| Job Room <input type="checkbox"/> | NGO <input type="checkbox"/> | Interest Group <input type="checkbox"/> |
| Industrial Union <input type="checkbox"/> | Labor Union <input type="checkbox"/> | Media <input type="checkbox"/> |
| University <input type="checkbox"/> | | |
| 2. INTERVIEW DETAILS (List of Invitees and actual participants, Summary of presentations made by whom, minutes of meeting will be annexes of this form.) | | |
| Questions about the project: | | |
| Concerns/feedback regarding the project: | | |
| Responses to the views expressed above: | | |

Annex-E Images of the interview





Annex-F Images of the Access Road











