



VERGO ENERJİ SİSTEMLERİ SAN. VE TİC. A.Ş.
GRIEVANCE REDRESS MECHANISM
CNR-PLN-VRG-GRM-001
OCTOBER 2023
REV.01

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ABBREVIATIONS AND DEFINITIONS

CİMER	The Presidential Communication Center (Cumhurbaşkanlığı İletişim Merkezi)
ÇINAR	Çınar Engineering and Consultancy Inc. – Consultant
CLO	Community Liaison Officers
GRM	Grievance Redress Mechanism
GRS	World Bank Grievance Redress Service
Inc	Incorporated Company
KVKK	The Law on Personal Protection of Data (Kişisel Verilerin Korunması Kanunu)
No.	Number
OHS	Occupational Health and Safety
OIZ	Organized Industrial Zone
PAP	People Affected Person by the Project
Project	Production/manufacturing of solar panel carrier construction system
Project Owner	Vergo Enerji Sistemleri San. ve Tic. A.Ş. (VERGO)
San.	Sanayi
SEP	Stakeholder Engagement Plan
Stakeholder	(a) Parties affected by the project (Those who are affected or likely to be affected by the project) (b) Other interested parties (Those who may be interested in the Project)
TKYB	Development Investment Bank of Türkiye
YİMER	Foreigners Communication Center (Yabancılar İletişim Merkezi)



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1. INTRODUCTION

VERGO Enerji Sistemleri San. ve Tic. A.Ş. ("VERGO"), which is one of the companies that produces and exports solar energy systems in Turkey, focuses on the production/manufacturing of solar panel carrier construction systems (steel) and offers design, projecting, production and on-site assembly services in line with the demands of the customers.

VERGO began its operations in 2015 in Organized Industrial Zone (OIZ) of Halilbeyli at Kemalpaşa district, İzmir province with total facility area of 16 decares. After signing the contract (23.12.2020 with no: 2020/0064/0) with Türkiye Kalkınma ve Yatırım Bankası (Development and Investment Bank of Türkiye – "TKYB") and getting the loan for the construction of new facility to be paid back until 22.06.2028, VERGO has purchased the new industrial area (which has total allocated area of 62,494.59 m² with 17,817 m² closed area) in Salihli Organized Industrial Zone (OIZ)/ Manisa. In January 2021, another consultant firm prepared Management Plans to cover the construction and operation phases of the project.

VERGO fully completed to moving process in August, 2021 from Kemalpaşa, İzmir to Salihli, Manisa. It continues to work in Salihli OIZ with NACE code of 28.99.90. This facility and financed project will hereinafter be referred to as the "Facility" and "Project" respectively. In the facility, the steel rolls are subjected to slitting/cutting, punching (Press Line), bending (by means of press brake and roll form machines) and quality control processes in order to produce pipe&box, profile (C-U) and Wbeam.

As a requirement for obtaining financial support, VERGO is obligated to develop and implement a Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) in compliance with the "Performance Standards (PS) of the International Finance Corporation (IFC) and National Legal Requirements. SEP and GRM were originally crafted for the project's construction phase and was made available on VERGO's website following approval from TKYB. However, due to the transition of the Project into its operational phase in Salihli OIZ and the resultant changes in the external stakeholder list and internal stakeholder relationships, revisions of the SEP and GRM became necessary. This plan outlines the revised stakeholder engagements related to the Project and has been prepared on behalf of VERGO by ÇINAR Engineering and Consultancy Inc. ("ÇINAR").

1.1 Purpose and Scope

The Grievance Redress Mechanism (GRM), created by ÇINAR on behalf of the Project Owner, functions as a guideline for overseeing how communication and interaction processes should be effectively managed throughout the credit period. This involves engagement with stakeholders and interest groups who may be directly or indirectly affected by the Project. The GRM categorizes them into distinct groups, namely internal and external stakeholders. This mechanism is established as one of the tools for implementing the SEP Report (CNR-PLN-VRG-SEP-001). Following approval of the SEP, it will be made available for public access on the company's website.

As one of the implementation tools of SEP, the GRM, which categorizes internal and external stakeholders under separate headings, aims to collect complaints, opinions, suggestions, feedback, and questions related to environmental and social impact in order to serve this purpose.



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The interconnected documents, SEP and GRM, collectively strive to ensure the Project's compliance with human rights in the context of human and environmental health. These established goals can be monitored through regular reporting and third-party oversight.

This GRM has been prepared for stakeholders who may be directly or indirectly affected by the Project, both positively and/or negatively, in environmental and social aspects, as well as for other relevant stakeholders who may have an interest in the Project.

2. CURRENT GRIEVANCE REDRESS MECHANISM

2.1 Internal Grievance Mechanism

The Project Owner has an "Employee Feedback Procedure" in place. According to this procedure, the primary responsible individuals are the Quality Manager and Quality Engineer. Department managers, who are the recipients of complaints, suggestions, or requests, come next in line. Feedback, suggestions, and complaints are regularly evaluated. Priority is given to feedback that requires immediate attention. Based on the findings, necessary improvements are identified, and a plan is developed on how to implement these improvements according to their importance. Feedback is provided to employees who have suggestions, recommendations, or complaints as needed. The procedure covers all personnel working at VERGO.

There are complaint boxes located inside the facility for the internal complaint mechanism. The number of complaint boxes (2) is sufficient for the facility.

The complaint registration forms (see Appendix 1: Complaint Register Form) include an option for suggestions. There are sections designated for problem description, proposed solution, and the contributions it will provide. The content of the complaint forms also includes assessment and acceptance sections. Finally, there is a section confirming that the personnel handling the complaints have received the complaint.

2.2 External Grievance Mechanism

The purpose of this procedure is to outline the principles, standards, methods, and how the complaint management for addressing external complaints will be integrated into operations. It defines the responsibilities and duties within the scope of this procedure and outlines all stages of the mechanism for both external stakeholders and direct/indirect employees.

VERGO's external complaint management procedure has been prepared in line with the Stakeholder Engagement Plan. The procedure defines external stakeholders (customers, suppliers, local communities, Non-Governmental Organizations, etc.) and potential individuals affected by the project (PAPs).

Complaints are addressed according to a specific timeline. The individuals responsible for monitoring complaints are human resources, the quality manager, and department managers. Contact information is provided in the procedure.

Information about recording complaints is provided, and within the records, a historical action timeline is outlined. A target of 14 days is set for responding to and closing complaints.



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There is no specific complaint form for external complaints. Complaints mainly consist of customer complaints submitted via email. The customer complaint registration system appears to follow a systematic approach adequately.

2.3 Contact Channels

The Project Owner has a corporate website, and within the contact page of this website, it can be found the contact information for VERGO's facility in Salihli District, which is financed through TKYB.

Address Salihli OSB Mah. 307 Sok. No:13 Salihli / MANİSA
Phone +90 (232) 880 70 80
Fax +90 (232) 880 70 81
E-mail info@vergo.com.tr

On the same page, contact information for VERGO's other facilities and a contact form also exist. To enhance the Project Owner's visibility, the official logo is shared below in Figure 1.



Figure 1. The Logo Used by the Project Owner

The key stakeholders of the Project are the Development Investment Bank of Türkiye (TKYB) and the World Bank (WB). Both institutions have their own grievance redress mechanisms. In addition to these mechanisms, the following addresses can also serve as alternative channels for stakeholders to submit complaints.

TKYB Grievance Mechanism

Adress : Saray Mahallesi, Dr. Adnan Büyükdeniz Cd. No:10 34768 Ümraniye/İstanbul
Phone : +90 (216) 636 87 00
E-Mail : haberlesme@kalkinma.com.tr

World Bank Grievance Redress Service (GRS):

Online Access : <https://wbgcmsgrs.powerappsportals.com/en-US/new-complaint/>
E-Mail : grievances@worldbank.org

A form¹ that can be submitted by mail or in person to the World Bank Headquarters in Washington, D.C². Or the World Bank Country Office.

¹ docx for GRS: <https://thedocs.worldbank.org/en/doc/743201426857500569-0290022021/original/GrievanceRedressServiceGRScomplaintform.docx>



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The Presidential Communication Center (CİMER)³ and the ALO150 Direct Presidential Line⁴, which operate under the Presidency of the Republic of Türkiye, serve as application centers that stakeholders outside of the Project can utilize. It should be noted that, within the scope of Law No. 4982, dated 2003, on the Right to Access Information⁵, it is possible to use CİMER to communicate complaints in stakeholder relations, and this should be reminded to all relevant stakeholders.

It was founded in 2003 as an Emergency Contact Line for Victims of Human Trafficking, ALO 157, in 2014, was taken over by the Directorate General of Migration Management under the Ministry of Interior of the Republic of Türkiye. Its service network was expanded, and as of August 20, 2015, it began operating under the name "Foreigners Communication Center" (Yabancılar İletişim Merkezi or YİMER)⁶. YİMER provides uninterrupted service to foreigners in seven languages: Turkish, English, Arabic, Russian, Persian, German, and Pashto, 24 hours a day, 7 days a week.

In addition to the communication channels provided above for all stakeholders, opportunities for face-to-face communication should be made available. To achieve this, social experts, and Community Liaison Officers (CLOs) who will be appointed should actively participate in fieldwork.

The Public Relations Office should serve as a workspace where empty complaint forms are provided, and filled forms are received. In addition to this, it should also function as a Project unit that assists individuals in filling out complaint forms through face-to-face communication with those who wish to submit a complaint.

² World Bank Head Office. 1818 H Street, NW Washington, DC 20433 ABD Tel : (202) 473-1000

³ Directorate of Communications Presidential Communications Center. For Access: cimer.gov.tr

⁴ ALO150 Direct Presidential Line. For Access: cimer.gov.tr

⁵ Right to Information Act. The Presidency of the Republic of Türkiye, Information System of Regulations. For Access: <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.4982.pdf>

⁶ Foreigners Communication Center. For Access: <https://yimer.gov.tr/>



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3. GRIEVANCE REDRESS MECHANISM

The main responsibility belongs to the Project Management, including the HR Unit, CLO, and GRM coordinators. The GRM coordinators, who have the primary GRM responsibility, are social experts. In the internal stakeholder GRM, HR employees, and in the external stakeholder GRM, two individuals, one male and one female, serve as CLOs.

The GRM coordinators should organize all upper and lower units in a way that allows subcontracted employees, contract workers, and interns to communicate their views and concerns regarding all internal and external stakeholder complaints.

GRM categorizes both internal and external stakeholders separately, covering all of them. Internal or internal GRM deals with processes such as working conditions, occupational health and safety, human resources management, training, and evaluation among internal stakeholders. It involves recording, categorizing, evaluating, responding to, and analyzing complaints, opinions, suggestions, feedback, and questions conveyed through printed forms, online documents, and/or other verbal/written communication methods. External stakeholders are assessed in the same or similar ways in the external or external GRM. All processes presented within GRM will be applied similarly for both internal and external GRM (see also Appendix 1: Complaint Register Form,



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Appendix 2: Complaint Closure Form, Appendix 3: Internal Grievance Log Example and Appendix 4: Grievance Mechanism Flowchart).

3.1 Information Disclosure Methods

Information and disclosure methods, specific to the operational period, will encompass informative documents and consultation meetings, which will be determined separately for both printed and online formats. These are;

- Brochures, posters, flyers, etc., containing current information about the Project, contractor, and facility, and featuring informative short notes.
- The official website of the Project, where relevant documents are available online.
- Current announcements on the Project's official website.
- Current announcements on the Project's social media accounts.
- Notice boards containing warnings and information regarding occupational health and safety, security, and waste management to be placed within the facility and its surroundings.
- Suggestion, complaint, and feedback boxes to be placed within the facility and its surroundings.
- Collaboration and consultation meetings with stakeholders regarding occupational health and safety, security, and waste management.
- Consultation meetings with local and regional institutions and organizations.
- Collaboration and consultation meetings with relevant local and regional institutions for employment purposes.
- In-depth interviews and interviews.
- Focus group meetings.
- Information and collaboration meetings covering the supply chain and potential buyers.



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3.2 Receiving and Recording Grievances

As the GRM coordinator, it is essential to appoint social experts, and these individuals should collaborate with the HR unit and CLOs.

Complaints can be submitted using all the communication channels mentioned above. Blank complaint forms will be transferred to an online system, where they will be recorded and organized. The initial registration process can be carried out by the social expert, CLO, or HR unit to whom the complaint form is received. In this regard, all communication channels should be structured in a way that allows the complaint form to be forwarded to the relevant units. For example, a complaint sent via email should be appropriately forwarded to the HR unit and then registered in the GRM system. This should also apply to complaints received through phone calls, written letters, CIMER, face-to-face communication, and other methods.

It's important to provide the complainant with a copy or an example of the complaint registration form. This not only ensures transparency but also helps the complainant understand the information and details being recorded. It can serve as a reference for the complainant, helping them to complete the form accurately and comprehensively. Additionally, it demonstrates a commitment to open communication and fairness in addressing concerns.

The complaint registration form should include the following information:

- Complainant's name and contact information.
- An option for anonymous registration if the complainant does not wish to share personal data.
- Date of the complaint.
- Subject of the complaint.
- Complainant's proposed solution.
- Name and contact information of the person receiving the complaint.
- If necessary, contact information for the department and individual to whom the complaint will be forwarded.
- Actions taken to address the complaint.
- Closure date if the complaint is resolved.
- All necessary documents to track the process if the complaint remains open.

If the subject of a complaint involves a public institution or organization outside the facility, guidance should be provided to the complainant on how to forward the complaint to the relevant institution. This guidance should be continued while preserving the complainant's right to anonymous registration, especially in cases where the stakeholder is a victim of harassment, violence, or abuse.

Similarly, in cases involving internal stakeholders and issues such as workplace accidents and labor disputes, support should be provided to the stakeholder in collaboration with the HR and OHS (Occupational Health and Safety) units.

Complaints should be recorded within one (1) business day from the moment they are received. Recording complaints is crucial for monitoring purposes. Even if complaints are conveyed verbally, they should be processed according to the registration forms and workflow diagram outlined in the following sections.

3.3 Evaluation and Redress Process



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Once complaints have been recorded through all communication channels, contact should be established with the complainant within two (2) business days. During this communication, information should be provided to the complainant about the methods that will be applied to resolve the complaint, and it should be conveyed that the evaluation process will be completed within ten (10) business days.

An important aspect to consider here is the requirement to maintain the confidentiality of all recorded data in accordance with Article 20 of the Turkish Constitution and the Personal Data Protection Law⁷ (KVKK). In addition, during the evaluation and resolution process, comprehensive consideration should be given to the ESS, PS, the Turkish Constitution, and the principles of sustainability established by the Bank, as outlined in the SEP. A process that aligns with the SEP should be followed.

The complainant's proposed solution, when submitted along with the complaint form, must be taken into consideration during the resolution and evaluation process.

If the solution is complex process, it may take up to 20 days to propose a solution, and negotiations between parties aim to conclude within 30 business days for an agreement.

During this period, a solution aligned with the complaint should be offered. This solution should uphold individual rights and meet the complainant's satisfaction. After mutual agreement on the proposed solution is reached, corrective actions should begin within 30 days.

If consensus cannot be reached on the proposed solution, the complainer should be informed that they have the right to resort to legal channels, and guidance should be provided to the stakeholder for any subsequent legal processes (see also Appendix 1: Complaint Register Form,

7 Law on Protection of Personal Data. The Presidency of the Republic of Türkiye, Information System of Regulations. For Access: <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.6698.pdf>



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Appendix 2: Complaint Closure Form, Appendix 3: Internal Grievance Log Example and Appendix 4: Grievance Mechanism Flowchart).

3.4 Closure of Grievances

Once the agreed-upon solution proposal is processed, it is recorded in the system along with its outcomes. All documents related to the complaint and copies of the actions taken during the resolution process are provided to the complainant, and the complaint is closed with a mutual agreement. A copy of the signed agreement is also provided to the stakeholder.

3.5 General Evaluation of Grievances

In accordance with Article 20 of the Turkish Constitution and, the data recorded is anonymized and reported, serving as an infrastructure for the management of similar processes. This infrastructure, which can be referred to as a complaint classification or analysis system, will expedite the Project's efforts to reduce environmental and social adverse impacts and enhance positive effects. By streamlining the assessment and implementation processes of complaints and requests on similar issues, the Project can strengthen its relationships with stakeholders.

4. GAP ANALYSIS AND RECOMENDATIONS

When comparing the Project Owner's existing complaint mechanism with the proposed complaint mechanism, the following improvement measures are recommended:

4.1 Internal Grievance Mechanism

- The procedure should recognize the right to anonymous complaints; therefore, it is recommended to add a relevant clause.
- There is no timeline specified in the procedure. It is necessary to clearly outline how long it will take to take specific actions after receiving complaints.
- The procedure does not contain a provision for record-keeping. It is recommended to include a section emphasizing the systematic documentation of grievances in a grievance log.
- The number of complaint boxes within the facility is sufficient. However, it is important to ensure that these boxes are located where security cameras cannot capture them to enable anonymous complaints. This should be taken into consideration.
- Complaint forms emphasize suggestions and improvements. Complaint forms should also be open to complaints in addition to suggestions and requests.
- There are no dates recorded in the complaint registration system regarding the actions taken after receiving complaints. Dates of actions and feedback from complainants should be added to the registration system.
- Encouraging employees to use the complaint mechanism is essential. It should be remembered that verbal complaints should also be documented, and the GRM should be applied.

4.2 External Grievance Mechanism



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- It is recommended to pay attention to the categorization of complaints and product types in the customer complaint registration system. Avoiding data entry errors in a database will provide a more systematic recording approach. For instance, in complaint records, it was observed that products under the "Product type" column were recorded as both "c Profile" and "C Profile," even though they refer to the same product. However, these differences can lead to misunderstandings and incorrect categorizations in Excel spreadsheets.
- It is known that no complaints have been received from local communities. However, it is recommended to inform local authorities (mukhtars) and conduct meetings by visiting residential areas to ensure that complaints also include local communities.



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5. APPENDICES

Appendix 1: Complaint Register Form

Şikayet Kayıt Formu Complaint Register Form			
Kayıt No: <i>Register No</i>		Tarih: <i>Date</i>	
Başvuru Sebebi <i>Reason for Application</i>	Şikayet <input type="checkbox"/>	İstek/Talep <input type="checkbox"/>	Soru <input type="checkbox"/>
	<i>Complaint</i>	<i>Request</i>	<i>Question</i>
Başvuru Alma Yöntemi <i>Reception Channel</i>	Telefon <input type="checkbox"/>	Dilekçe/Form <input type="checkbox"/>	E-Posta <input type="checkbox"/>
	<i>Phone</i>	<i>Petition/Form</i>	<i>E-Mail</i>
Başvuran Bilgileri Applicant Information			
İsim ve Soyisim (Opsiyonel) <i>Name and Surname (Optional)</i>			
İletişim Bilgileri <i>Contact Info</i>			
İletişim Tercihleri <i>Communication Preferences</i>	Telefon <input type="checkbox"/>	Adres <input type="checkbox"/>	E-Posta <input type="checkbox"/>
	<i>Phone</i>	<i>Adress</i>	<i>E-Mail</i>
			Yüzyüze <input type="checkbox"/>
			<i>Face-to-face</i>
Başvuru İçeriği Application Content			
Başvuruya Konu Olan Olayın Detayları <i>Details of the Incident Subject to the Application</i>			
Konu Şikayet ise Şikayetçinin Çözüm Önerisi <i>If the subject is a complaint, the Complainant's Solution Suggestion</i>			
Kayıt Alan Birim Bilgileri <i>Registration Unit Information</i>			



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Appendix 2: Complaint Closure Form

Şikayet Kapatma Formu <i>Complaint Closure Form</i>			
Aksiyon Bilgileri <i>Action Informations</i>			
Tarih <i>Date</i>	Açıklama <i>Explanation</i>	Sonuç <i>Conclusion</i>	Şikayetçinin Geribildirimi <i>Feedback</i>
Kayıt Alan Birim Bilgileri <i>Registration Unit Information</i>			



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Appendix 3: Internal Grievance Log Example

No	Alındığı tarih Reception Date	Öneri/şikayet Bildirim Yolu Suggestion/complaint Submission Way	Öneri / Şikayeti Alan Suggestion / Complaint Receiver	Öneri / Şikayet Konusu Suggestion / Complaint Subject	Yapılan / Yapılacak Faaliyet Activity Done/To Be Done	Üst Yönetimin Görüşü Opinion of Senior Management	Sonuçlanma Tarihi Completion Date	Sonuç Conclusion	Şikayetçinin Geribildirimi Complainant's Feedback	Devam Eden Yasal Süreç Olduysa Ayrıntıları Details if there is ongoing legal action



Appendix 4: Grievance Mechanism Flowchart

