



**VERGO ENERJİ SİSTEMLERİ SAN. VE TİC. A.Ş.**  
**STAKEHOLDER ENGAGEMENT PLAN**  
**CNR-PLN-VRG-SEP-001**  
**OCTOBER 2023**  
**REV.01**

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 2 / 37



**Bağlıca Mah. Çambayırı Cad. Çınar Plaza No:66/5 06790 Etimesgut/ ANKARA**

**Tel: +90 312 472 38 39 Fax: +90 312 472 39 33**

**Web: cinarmuhendislik.com**

**E-mail: cinar@cinarmuhendislik.com**

**All rights of this report are reserved.**

All or part of this report cannot be reproduced, copied, electronically reproduced, traded, transmitted, sold, rented, used for any purpose, or used in any form and method in digital and/or electronic media without written permission from ÇINAR Engineering Consultancy Inc. as per the Law No. 5846 on Intellectual and Artistic Works amended with the Law No. 4110.



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 3 / 37

### DOCUMENT REVISION HISTORY SHEET

Rev.	Date	Prepared by	Controlled by	Approved by	Explanation
01	October 2023	M.Ç.	Ö.Ç.	A.C.A.	Rev.01



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 4 / 37

## TABLE OF CONTENTS

<b>TABLE OF CONTENTS.....</b>	<b>4</b>
<b>LIST OF TABLES .....</b>	<b>5</b>
<b>LIST OF FIGURES.....</b>	<b>5</b>
<b>APPENDICES .....</b>	<b>5</b>
<b>ABBREVIATIONS AND DEFINITIONS .....</b>	<b>6</b>
<b>1. INTRODUCTION .....</b>	<b>7</b>
1.1. Overview.....	7
1.1.1. Location .....	7
1.2. The Purpose and Scope.....	9
<b>2. NATIONAL AND INTERNATIONAL REQUIREMENTS .....</b>	<b>10</b>
2.1. The Requirements of Development and Investment Bank of Türkiye.....	10
2.2. The Constitution of the Republic of Türkiye .....	13
2.3. International Requirements .....	17
2.3.1. International Finance Corporation Performance Standards.....	17
2.3.2. World Bank Environmental and Social Standards.....	18
<b>3. STAKEHOLDER ENGAGEMENT PLAN .....</b>	<b>22</b>
3.1. Stakeholder Identification .....	22
3.1.1. Internal Stakeholders.....	22
3.1.2. External Stakeholders .....	23
3.1.3. Disadvantaged / Vulnerable Individuals or Groups .....	24
1.1.1 Other Interested Parties .....	24
3.2. Information Disclosure Methods.....	24
3.3. Roles and Responsibilities .....	25
3.4. Previous Stakeholder Engagement Activities.....	28
3.4.1. Information Disclosure .....	28
3.4.2. Review of the Documents.....	29
3.4.3. Grievance Redress Mechanism .....	29
3.4.4. Training Programs and Seminars.....	30
3.4.5. Field Studies .....	31
3.5. Grievance Redress Mechanism .....	33
<b>4. MONITORING AND REPORTING .....</b>	<b>34</b>
<b>5. REVIEW AND UPDATE.....</b>	<b>37</b>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 5 / 37

## LIST OF TABLES

Table 1. Distances of the Nearest Settlements .....	8
Table 2. Sustainability Principles of TKYB .....	10
Table 3. The Constitution Requirements and Extent of Stakeholder Engagement Dimension .....	14
Table 4. World Bank ESS and IFC Performance Standards.....	19
Table 5. Internal Stakeholder List.....	22
Table 6. External Stakeholder List .....	23
Table 7. Roles and Responsibilities .....	25
Table 8. Trainings and Seminar Subjects .....	30
Table 9. Internal Stakeholder Interviews .....	32
Table 10. External Stakeholder Interviews.....	32
Table 11. Stakeholder Action Plan .....	35

## LIST OF FIGURES

Figure 1. Project Location.....	8
Figure 2. Corporate Logo of VERGO .....	28
Figure 3. GRM Flowchart .....	33

## APPENDICES

**Appendix-1** HR Policy and Procedure Documents

**Appendix-2** Other Policies

**Appendix-3** Grievance Redress Procedures



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 6 / 37

## ABBREVIATIONS AND DEFINITIONS

<b>A.Ş.</b>	Incorporated company (Anonim Şirketi)
<b>ÇINAR</b>	Çınar Engineering and Consultancy Inc. – Consultant
<b>CLO</b>	Community Liaison Officer
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESS</b>	Environmental and Social Standards
<b>FI</b>	Financial Intermediaries
<b>GRM</b>	Grievance Redress Mechanism
<b>HR</b>	Human Resources
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labor Organization
<b>NGO</b>	Non-Governmental Organizations
<b>No.</b>	Number
<b>OHS</b>	Occupational health and Safety
<b>OIZ</b>	Organized Industrial Zone
<b>OSBÜK</b>	Organized Industrial Zones Superior Institute (Organize Sanayi Bölgeleri Üst Kuruluşu)
<b>Project</b>	Production/manufacturing of solar panel carrier construction system
<b>Project Owner</b>	Vergo Enerji Sistemleri San. ve Tic. A.Ş. (VERGO)
<b>PS</b>	Performance Standards
<b>San.</b>	Industrial (Sanayi)
<b>SEP</b>	Stakeholder Engagement Plan
<b>Stakeholder</b>	(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)
<b>Tic.</b>	Trade (Ticaret)
<b>TKYB</b>	Türkiye Kalkınma Yatırım Bankası (Development Investment Bank of Türkiye)
<b>WB</b>	World Bank
<b>WBG</b>	World Bank Group



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 7 / 37

## 1. INTRODUCTION

### 1.1. Overview

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 m<sup>2</sup> with 17,817 m<sup>2</sup> 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.

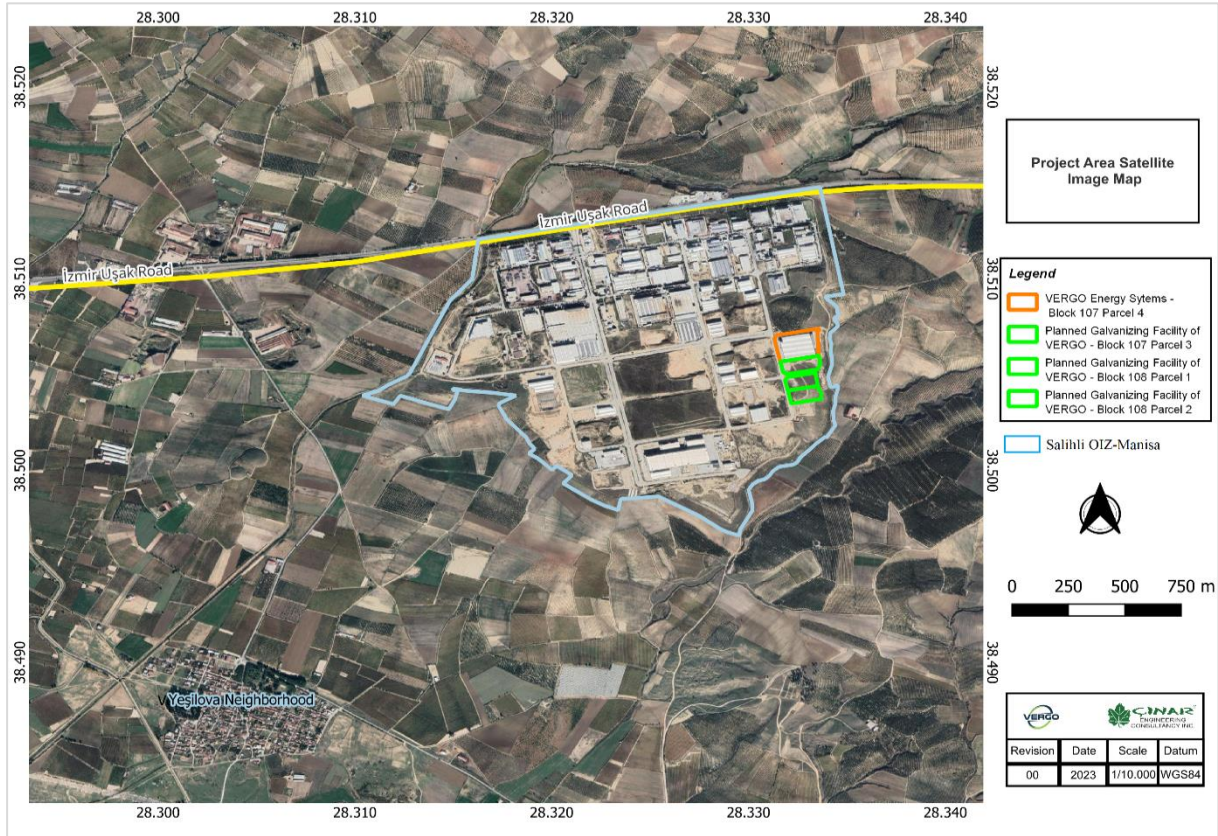
As a requirement for obtaining financial support, VERGO is committed to prepare and implement a Stakeholder Engagement Plan (SEP) in accordance with the "Performance Standards (PS) of the International Finance Corporation (IFC) and National Legal Requirements. A SEP had been developed for the construction phase of the project and was published on VERGO's website after approval from TKYB. However, with the transition of the Project into the operational phase in Salihli OIZ and the resulting changes in external stakeholder list and internal stakeholder relationships, a revision of the SEP became necessary. In line with this requirement, TKYB gave a directive to the Project Owner to revise the SEP. This plan presents the revised stakeholder engagements related to the Project and has been prepared on behalf of VERGO by Çınar Engineering and Consultancy Inc. ("ÇINAR").

#### 1.1.1. Location

VERGO's previous facility was in the Halilbeyli OIZ in Kemalpaşa, İzmir. The project involves establishing a new production complex on the land purchased by VERGO in Salihli OIZ and relocating its operations from the previous location in Kemalpaşa to Salihli OIZ.

The new production complex, situated within the boundaries of Salihli OIZ in Salihli district of Manisa province, occupies a total area of 62,494.59 square meters and is officially registered as an industrial parcel in the records. The image of the area where the facility is located is shown in Figure 1.





**Figure 1. Project Location**

The information regarding the settlements in the project area is provided in Table 1. Within the scope of field studies, an assessment of the livelihoods of settlements and the evaluation of potential positive and adverse impacts of the project is presented in Table 10 under the heading "3.4.5. Field Studies."

**Table 1. Distances of the Nearest Settlements**

Neighborhood	Direction	Distance	2022 Population <sup>1</sup>
Torunlu	South	2 km	646
Yeşilova	Southwest	3 km	201
Mersinli	East	3.8 km	1,592
Durasıllı	West	4 km	7,075

<sup>1</sup> Turkish Statistical Institute, Address Based Population Registration System. <https://biruni.tuik.gov.tr/medas/?kn=95&locale=en>  
Access date: September, 2023



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 9 / 37

## 1.2. The Purpose and Scope

This SEP has been prepared by ÇINAR to guide the management of communication and interaction processes that need to be established during the financing period among institutions, organizations, entities, and other stakeholders who may be directly or indirectly affected by the Project, and it is being carried out by VERGO.

Additionally, the SEP aims to contribute, through effective engagement of internal and external stakeholders, to minimize the environmental and social impacts of the Project and enhance its positive effects.

This SEP has been created in response to the need to revise the previously established SEP due to changes in the project's external stakeholder list and internal stakeholder relationships.

The SEP is a live document that will be regularly monitored, reviewed, and updated by the Project Owner. Once the SEP is approved by TKYB, it will be published on the company's website.

This SEP has been prepared to encompass all stages of the project and aims to comply with the following requirements (see Section 2 for details):

- The Constitution of the Republic of Türkiye
- World Bank's Environmental and Social Standards (ESS)
- International Finance Corporation (IFC) Performance Standards (PS)
- Environmental and Social Action Plan (ESAP) created by the Development and Investment Bank of Türkiye and
- The TKYB's Sustainability Principles.

The Grievance Redress Mechanism (GRM) is one of the implementation tools of the SEP and serves the purpose of gathering grievances, opinions, suggestions, feedback, and questions related to expected environmental and social impacts by covering internal and external stakeholders under separate subjects.

The SEP and GRM, created in accordance with the ESAP, have been developed as interconnected documents, with both aiming to ensure the Project's compliance with human rights and stakeholder engagement in terms of community health and environment. The established goals can be monitored through regular reporting and third-party oversight.

The Project Owner commits to implement the information, explanations, and practices outlined in this SEP, as well as in the report approved by TKYB, throughout all stages of the Project.



## 2. NATIONAL AND INTERNATIONAL REQUIREMENTS

In the subsections of this section, the relationship between national regulations and the international standards conveyed will be presented in conjunction with the stakeholder engagement dimension of the Project. The methods of stakeholder engagement that are necessary and appropriate, how they will be implemented, and the frequency of monitoring and reporting for these methods according to all phases of the Project are presented in Chapter 3: Stakeholder Engagement Plan.

### 2.1. The Requirements of Development and Investment Bank of Türkiye

The ESAP prepared by TKYB and outlining the credit requirements, budget, and timeline evaluation criteria for the entire financing period of the Project, complies with the Environmental and Social Risk Assessment Procedures, IFC Performance Standards, International Labour Organization (ILO) conventions, especially ratified ones, and national regulations. It also establishes the environmental and social monitoring plan for the Project.

The mission of TKYB is to work towards sustainable development priorities<sup>2</sup> by meeting the financing and advisory needs of investors, helping facilitate structural transformation, and contributing to the broadening of capital. In line with this purpose, TKYB's sustainability principles and their relationship with the Project are presented in Table 2.

**Table 2. Sustainability Principles of TKYB**

No	Principles	Extent of the Stakeholder Engagement
1	Taking into consideration potential direct and indirect environmental and social impacts.	<ul style="list-style-type: none"> <li>▪ Ensuring timely information to stakeholders about environmental and social risks during construction and operation phases.</li> <li>▪ Informing stakeholders in the event of potential pollution incidents.</li> <li>▪ Engaging in consultations with stakeholders on reducing risks and increasing positive activities in the information processes.</li> </ul>
2	The necessity for environmental and social risk assessment to be an integral part of routine decision-making processes for all investment and credit applications.	<ul style="list-style-type: none"> <li>▪ Informing stakeholders about environmental and social risks in a timely manner during construction and operation phases.</li> <li>▪ Notifying stakeholders in the event of potential pollution incidents.</li> <li>▪ Engaging in consultations with stakeholders regarding risk reduction and the enhancement of positive activities in the information processes.</li> </ul>
3	Regularly monitoring adverse environmental and social impacts and increasing positive environmental and social activities while minimizing them.	<ul style="list-style-type: none"> <li>▪ Stakeholders are being informed in a timely manner about environmental and social risks during construction and operation phases.</li> <li>▪ Notifying stakeholders in the event of potential pollution incidents.</li> <li>▪ Engaging in consultations with stakeholders on risk reduction and increasing positive activities in the information processes.</li> </ul>

<sup>2</sup> TKYB, Sustainability Principles. June 2020. For Access; <https://kalkinma.com.tr/bizi-taniyin/cevreci-kalkinma/cevresel-ve-sosyal-politikalar> Access Date: September 2023.

No	Principles	Extent of the Stakeholder Engagement
4	Supporting capacity development as a sustainability requirement.	<ul style="list-style-type: none"> <li>▪ Involving all stakeholders in the process during both the construction and operation phases.</li> <li>▪ Engaging in consultations with stakeholders on risk reduction and increasing positive activities in the information processes.</li> </ul>
5	Recognizing the need for collaboration with all stakeholders and developing collaboration opportunities for sustainable success.	<ul style="list-style-type: none"> <li>▪ Creating the necessary environment for stakeholders to access the information they need about the Project during stakeholder interactions.</li> <li>▪ Involving all stakeholders in the process during both the construction and operation phases.</li> <li>▪ Engaging in consultations with stakeholders on risk reduction and increasing positive activities in the information processes.</li> </ul>
6	Setting goals to regularly measure, monitor greenhouse gas emissions, resource consumption, and increase resource and energy efficiency.	<ul style="list-style-type: none"> <li>▪ Construction and operation phases should involve timely informing of stakeholders about environmental and social risks.</li> </ul>
7	Commitment to the United Nations Sustainable Development Goals.	<ul style="list-style-type: none"> <li>▪ Involving all stakeholders in the process during both the construction and operation phases.</li> <li>▪ Timely informing stakeholders about environmental and social risks during construction and operation phases.</li> </ul>
8	Embracing climate change mitigation and sharing it with stakeholders through the Climate Change Adaptation Policy.	<ul style="list-style-type: none"> <li>▪ Involving all stakeholders in the process during both the construction and operation phases.</li> <li>▪ Timely informing stakeholders about environmental and social risks during both the construction and operation phases.</li> </ul>
9	Providing a work environment that respects human rights, promotes justice, equality, and trust, and creating awareness among customers about this.	<ul style="list-style-type: none"> <li>▪ Maintaining the principles of equality and social justice in stakeholder engagement.</li> <li>▪ Acting against all forms of discrimination in stakeholder engagement.</li> <li>▪ Preventing any discrimination against stakeholders when expressing themselves and ensuring equal and fair opportunities for all stakeholders.</li> <li>▪ Conducting encouraging and reminder actions to encourage stakeholders to express their thoughts and opinions, especially reminding internal stakeholders of their constitutional rights and freedoms and promoting freedom of expression.</li> <li>▪ Organizing special meetings for women, the poor, and disabled segments and developing different information methods for these vulnerable groups.</li> <li>▪ Recognizing equal opportunities locally and regionally in announcing recruitment and working conditions.</li> <li>▪ Informing, educating, and involving all internal stakeholders during both the construction and operation phases.</li> <li>▪ Informing all stakeholders about the Grievances Redress Mechanism (GRM) during both the construction and operation phases and ensuring their access to the GRM.</li> </ul>
10	Providing fair and equal opportunities in accordance with Human Resources Regulations.	<ul style="list-style-type: none"> <li>▪ Informing internal stakeholders about occupational health and safety.</li> <li>▪ Recognizing equal opportunities locally and regionally in announcing recruitment and working conditions.</li> <li>▪ Informing, educating, and involving all internal stakeholders during both the construction and operation phases.</li> <li>▪ Establishing an employee code of conduct and creating awareness on this matter.</li> <li>▪ Informing all internal stakeholders during both the construction and operation phases about the prevention of forced labor and child labor.</li> <li>▪ Informing and providing the appropriate environment for all internal stakeholders during both the construction and</li> </ul>

No	Principles	Extent of the Stakeholder Engagement
		<p>operation phases regarding freedom of association and collective bargaining principles.</p> <ul style="list-style-type: none"> <li>▪ Informing all internal stakeholders about the internal GRM and ensuring their access to it during both the construction and operation phases.</li> </ul>
11	Adopting a zero-tolerance policy against bribery and corruption and operating within the framework of the Anti-Bribery and Anti-Corruption Policy.	<ul style="list-style-type: none"> <li>▪ Implementing an open and transparent management system.</li> </ul>
12	Providing employees with a healthy and safe working environment in accordance with legal regulations and practices related to occupational health and safety.	<ul style="list-style-type: none"> <li>▪ Informing internal stakeholders about occupational health and safety.</li> </ul>
13	Following a fair and transparent communication policy in communication activities.	<ul style="list-style-type: none"> <li>▪ Involving all stakeholders in the process during both the construction and operation phases.</li> <li>▪ Recognizing equal opportunities locally and regionally in announcing recruitment and working conditions.</li> <li>▪ Organizing special meetings for women, the poor, and disabled segments and developing different information methods for these vulnerable groups.</li> <li>▪ Informing, educating, and involving all internal stakeholders during both the construction and operation phases.</li> </ul>
14	Creating communication channels (written, visual, and social media) to deliver timely and accurate information to stakeholders, obtain feedback from key stakeholders, and understand their priorities and needs.	<ul style="list-style-type: none"> <li>▪ The stakeholders of the Project, their interests, and support levels have been defined in the Scope section.</li> <li>▪ Informing stakeholders about environmental and social risks in a timely manner.</li> <li>▪ Consultations with stakeholders on risk reduction and increasing positive activities in the information processes have been defined under the GRM and detailed separately within the Grievance Redress Mechanism (CNR-PLN-VRG-GRM-001) report.</li> </ul>
15	Adopting an effective management model for developing, implementing, managing, and monitoring sustainability activities and supporting the implementation and continuous improvement of corporate sustainability management at the level of international sustainability standards.	<ul style="list-style-type: none"> <li>▪ Timely informing stakeholders about environmental and social risks during both the construction and operation phases.</li> <li>▪ Engaging in consultations with stakeholders on risk reduction and increasing positive activities in the information processes.</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 13 / 37

## 2.2. The Constitution of the Republic of Türkiye

According to the Constitution of the Republic of Türkiye<sup>3</sup>, and the Environmental Impact Assessment (EIA) Regulation<sup>4</sup> dated 29.07.2022 and numbered 31907, fundamental rights and freedoms, as well as the right to access information, awareness of ongoing projects, and stakeholder participation, are guaranteed.

The EIA Regulation, Article 4, defines "Informing the public and involving them in the process" as any activity specified in the stakeholder participation plan to inform the public about the project and to gather their views and suggestions regarding the project throughout the entire EIA process (such as brochures, promotional films, official announcements, meetings, information offices, and similar activities). Additionally, it defines "Public Participation Plan" as a plan that explains how communication will be established and information will be provided to legal/natural persons (stakeholders) who may be affected by or may affect the project or have a connection with the project, using which methods and tools, at all stages of the planned project.

According to Article 9 under "Informing the public and involving them in the process" of the EIA Regulation, a Public Participation Plan (which can be regarded as SEP) is prepared by competent institutions/organizations accredited by the Ministry to inform the public about the project and its impacts and to gather the public's views and suggestions regarding the project. The prepared stakeholder engagement plan is submitted as part of the EIA Application File. In cases deemed necessary by the Ministry, additional activities related to informing the public may be requested from accredited institutions/organizations throughout the EIA process. These activities may include distributing informative brochures, conducting surveys, seminars, or sharing project-related information through a website. Additionally, if requested by the Ministry, this plan can be updated during the EIA process.

Although this project is not within the scope of the EIA, compliance with national regulations under the Environmental and Social Standards (ESS1) is important.

The requirements of the Constitution in relation to stakeholder participation and information processes of the Project have been presented in Table 3.

---

3 Ministry of Interior. Constitution of Republic of Türkiye. For Access; <https://www.icisleri.gov.tr/kurumlar/icisleri.gov.tr/lcSite/illeridairesi/Mevzuat/Kanunlar/Anayasa.pdf> Access Date: September 2023

4 Presidency of the Republic of Türkiye. Information System of Regulations. Environmental Impact Assessment Regulation. For Access; <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=39647&MevzuatTur=7&MevzuatTertip=5> Access Date: September 2023



**Table 3. The Constitution Requirements and Extent of Stakeholder Engagement Dimension**

Article	Requirements	Extent of Stakeholder Engagement
<b>Preamble</b>	Every Turkish citizen is inherently entitled and empowered to lead a dignified life within the framework of national culture, civilization, and legal order by benefiting from the fundamental rights and freedoms specified in this Constitution, in accordance with the requirements of equality and social justice, and to develop their material and spiritual existence in this direction.	<ul style="list-style-type: none"> <li>▪ Stakeholder engagement should prioritize the preservation of equality and social justice principles.</li> </ul>
<b>Article 10</b>	Everyone is equal in front of the law, without distinction as to language, race, color, sex, political opinion, philosophical belief, religion, sect, or similar reasons. Women and men have equal rights.	<ul style="list-style-type: none"> <li>▪ Involvement of stakeholders should be carried out against all forms of discrimination.</li> </ul>
<b>Article 12</b>	Everyone possesses inherent, inviolable, inalienable, and irrevocable fundamental rights and freedoms.	<ul style="list-style-type: none"> <li>▪ Protection of personal rights in stakeholder relations.</li> </ul>
<b>Article 17</b>	Everyone has the right to life and the right to protect and develop their material and spiritual existence.	<ul style="list-style-type: none"> <li>▪ Protection of individual rights in stakeholder relationships.</li> </ul>
<b>Article 20</b>	Everyone has the right to demand respect for their private and family life. The privacy of private and family life cannot be violated. Everyone has the right to protect their personal data, including being informed about personal data related to themselves, accessing this data, requesting its correction or deletion, and learning whether it is being used for its intended purposes. Personal data can only be processed in cases prescribed by law or with the explicit consent of the individual. The principles and procedures for the protection of personal data are regulated by law.	<ul style="list-style-type: none"> <li>▪ Protection, confidentiality, and, when necessary, anonymization of personal data obtained in stakeholder relations.</li> <li>▪ Information should only be requested in stakeholder relations with the consent of the individual and the organization.</li> <li>▪ Preventing the unauthorized recording or photographing of individuals and/or organizations and their publication without consent.</li> </ul>
<b>Article 22</b>	Everyone has freedom of communication. The confidentiality of communication is essential.	<ul style="list-style-type: none"> <li>▪ Creating the necessary environment for stakeholders to access the information they desire about the project in stakeholder interactions.</li> <li>▪ Keeping the communication details where requests, suggestions, grievances, and questions from stakeholders are received confidential.</li> </ul>
<b>Article 24</b>	Everyone has freedom of conscience, religious belief, and conviction.	<ul style="list-style-type: none"> <li>▪ Preventing any discrimination against stakeholders when they express themselves and ensuring equal and fair opportunities for all stakeholders.</li> </ul>
<b>Article 25</b>	Everyone has the freedom of thought and opinion.	<ul style="list-style-type: none"> <li>▪ Preventing any form of discrimination when stakeholders express themselves and granting equal and fair chances to all stakeholders.</li> </ul>
<b>Article 26</b>	Everyone has the right to express and disseminate their thoughts and opinions in speech, writing, print, or other media individually or collectively.	<ul style="list-style-type: none"> <li>▪ Encouraging and reminding actions to facilitate stakeholders in expressing their thoughts and opinions, especially reminding internal stakeholders of their constitutional rights and freedoms and promoting freedom of expression.</li> </ul>
<b>Article 27</b>	Everyone has the right to freely learn and teach science and the arts, to express, disseminate, and conduct all kinds of research in these fields.	<ul style="list-style-type: none"> <li>▪ Creating the necessary environment in stakeholder interactions for stakeholders to access the information they desire about the project.</li> </ul>
<b>Article 40</b>	Everyone whose constitutional rights and freedoms are violated has the right to apply to the competent authority without delay for the	<ul style="list-style-type: none"> <li>▪ Providing information to stakeholders so that they can submit their grievances about the project to both the project owner through the internal GRM and directly</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 15 / 37

Article	Requirements	Extent of Stakeholder Engagement
	establishment of his/her rights.	<p>to the relevant authorities.</p> <ul style="list-style-type: none"> <li>▪ Especially in the case of grievances from internal stakeholders, reminding them that legal avenues for recourse outside of the internal GRM are also available.</li> </ul>
<b>Article 48</b>	Everyone has the freedom to work and conclude contracts in the field of their choice.	<ul style="list-style-type: none"> <li>▪ Ensuring equal information opportunities when announcing employment opportunities.</li> <li>▪ Consultations with stakeholders on promoting equal opportunities and preventing discrimination in employment.</li> <li>▪ Providing information to all internal stakeholders about their contractual and labor rights.</li> </ul>
<b>Article 50</b>	No one shall be employed in work unsuitable for their age, sex, and capacity.	<ul style="list-style-type: none"> <li>▪ Implementation of internal GRM activities to prevent forced labor, child labor, and modern slavery, including subcontractors and sub-contractors.</li> <li>▪ Informing stakeholders about the concepts of forced labor, child labor, and modern slavery.</li> <li>▪ Providing information to all Project employees, including subcontractors and sub-contractors, about their contractual and labor rights (all internal stakeholders).</li> </ul>
<b>Article 51</b>	Employees and employers have the right to establish unions and federations, and to become a member of these organizations or withdraw from them freely, without prior permission, to protect and improve their economic and social rights and benefits in their employment relationships. No one can be compelled to join or leave a union.	<ul style="list-style-type: none"> <li>▪ Providing information to all internal stakeholders about contractual, labor, and union rights.</li> <li>▪ Implementing internal GRM activities to eliminate barriers that restrict contractual and union rights.</li> </ul>
<b>Article 53</b>	Workers and employers have the right to conclude collective labor agreements with the aim of regulating their economic and social status and working conditions.	<ul style="list-style-type: none"> <li>▪ Informing both employers and employees about their rights.</li> <li>▪ Implementing internal GRM activities to protect both employers and employees.</li> </ul>
<b>Article 55</b>	Salary is the remuneration for labor. The state takes necessary measures to ensure that workers receive a fair wage appropriate to the work they perform and benefit from other social aids.	<ul style="list-style-type: none"> <li>▪ Implementation of internal GRM activities to prevent forced labor and modern slavery, including subcontractors and sub-contractors.</li> <li>▪ Ensuring equal job and working conditions among employees without allowing discrimination.</li> <li>▪ Informing subcontractors and sub-contractors about working hours, wages, overtime, compensation, and social benefits to prevent forced labor and modern slavery.</li> </ul>
<b>Article 56</b>	Everyone has the right to live in a healthy and balanced environment.	<ul style="list-style-type: none"> <li>▪ Providing equal jobs and working conditions that do not tolerate discrimination among employees.</li> <li>▪ Informing subcontractors and sub-contractors about working hours, wages, overtime, compensation, and social benefits to prevent forced labor and modern slavery.</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 16 / 37

Article	Requirements	Extent of Stakeholder Engagement
<b>Article 60</b>	Everyone has the right to social security.	<ul style="list-style-type: none"> <li>▪ Ensuring equal job and working conditions that do not permit discrimination among employees.</li> <li>▪ Informing both employers and employees about their rights.</li> </ul>
<b>Article 74</b>	Citizens and foreigners residing in Türkiye, subject to reciprocity, have the right to submit their requests and grievances about themselves or the public to the competent authorities and the Grand National Assembly of Türkiye in writing.	<ul style="list-style-type: none"> <li>▪ Encouraging and reminding actions to facilitate stakeholders in expressing their thoughts and opinions, especially reminding internal stakeholders of their constitutional rights and freedoms and promoting freedom of expression.</li> </ul>
<b>Article 148</b>	Everyone, who claims that one of the fundamental rights and freedoms guaranteed by the Constitution and within the scope of the European Convention on Human Rights has been violated by public authority, has the right to apply to the Constitutional Court.	<ul style="list-style-type: none"> <li>▪ Providing information to stakeholders that they can submit their grievances about the project to both the project owner through the GRM and directly to the relevant authorities.</li> <li>▪ Especially in the case of grievances from internal stakeholders, reminding them that legal avenue for recourse outside of the internal GRM are also available.</li> </ul>





<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 17 / 37

## 2.3. International Requirements

### 2.3.1. International Finance Corporation Performance Standards

The performance standards of IFC within the World Bank Group (WBG) follow the World Bank's Environmental and Social Framework. Therefore, the scope will be presented in conjunction with the World Bank standards. The relevant Performance Standards (PSs) are listed below.

- **PS 1:** Assessment and Management of Environmental and Social Risks and Impacts
- **PS 2:** Labor and Working Conditions
- **PS 3:** Resource Efficiency and Pollution Prevention
- **PS 4:** Community Health, Safety, and Security
- **PS 5:** Land Acquisition and Involuntary Resettlement
- **PS 6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- **PS 7:** Indigenous Peoples
- **PS 8:** Cultural Heritage

Within the context of IFC PS, involvement of stakeholders is mandated as a prerequisite for establishing the Environmental and Social Management System under PS1 (PS1.5). In the same standard, Stakeholder Engagement, as defined in PS1.25, asserts that "Stakeholder engagement is essential for the effective management of a project's environmental and social impacts. Stakeholder engagement is an ongoing process. It encompasses stakeholder analysis and planning, provision of stakeholder information, consultation and participation, establishment of grievance mechanisms, and regular reporting to Affected Communities. The form, frequency, and level of effort involved in stakeholder engagement may vary significantly based on the project's risks, adverse impacts, and its developmental stage." PS1.26 and PS1.27 lay out the requirements pertaining to stakeholder analysis and planning for engagement.

PS1.29 and PS1.30 delineate meaningful and effective information sharing processes, while PS1.35 provides the standards for a grievance mechanism for Affected Communities. The grievance mechanism is defined as follows: "Concerning Affected Communities, the client will establish a grievance mechanism to learn about and assist in addressing concerns and grievances of Affected Communities regarding the client's environmental and social performance. The grievance mechanism should be proportional to the risks and adverse impacts of the project and serve the Affected Communities. It should aim to promptly address concerns through a culturally appropriate, accessible, understandable, and transparent consultation process. The party raising a concern or grievance should not face any costs or sanctions. The grievance mechanism should not hinder recourse to legal or administrative remedies. The client will inform Affected Communities about the grievance mechanism during the stakeholder engagement process."

In projects where land acquisition is implemented, PS5.10 outlines Stakeholder Engagement, and for projects where biodiversity conservation is necessary, stakeholders benefiting from ecosystem services and affected communities are defined in accordance with PS6.6 and PS6.24.

The term "local communities" defined in PS7.5 is not applicable to Türkiye and falls outside the scope.



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 18 / 37

### 2.3.2. World Bank Environmental and Social Standards

The requirements of the Environmental and Social Standard<sup>5</sup> (ESS), detailed within the WB Environmental and Social Framework (ESF), have been presented in relation to the stakeholder participation and disclosure processes of the Project.

The stakeholder participation process detailed in "ESS10: Stakeholder Engagement and Information Disclosure" contains the following items in summary:

ESS10 is valid for all projects supported through investment project financing.

- ESS10 should be considered together with "ESS1: Assessment and Management of Environmental and Social Risks and Impacts" and "ESS2: Labor and Working Conditions".
- The requirements for interaction with workers are included in the ESS2, and special provisions related to emergency preparedness and responses are included in the ESS2 and ESS4: Community Health and Safety.
- Stakeholder participation is an inclusive process carried out throughout the project lifecycle.
- Stakeholder participation is implemented in the most effective way when it is initiated at an early stage of the Project.
- It ensures the development of strong, constructive, and sensitive relationships, which are important for the successful management of the environmental and social risks of the project when properly designed and implemented.
- Effective stakeholder participation improves the environmental and social sustainability of projects, increases the acceptance of the project, and makes an important contribution to successful project design and implementation.
- Open and transparent participation between the project and the stakeholders is the basic element of a good practice.

IFC Performance Standards and World Bank Environmental and Social Standards have been presented in Table 4 in relation to the Project's stakeholder engagement and information disclosure processes.

---

<sup>5</sup> World Bank Environmental and Social Framework .For Access: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards> Access Date: September 2023



**Table 4. World Bank ESS and IFC Performance Standards**

No	ESS / PS	Requirements	Extent of Stakeholder Engagement
<b>ESS1 PS1</b>	Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> <li>▪ Identifying, assessing, and managing the environmental and social risks and impacts of the project.</li> <li>▪ Taking differentiated measures for disadvantaged or vulnerable segments and including them in opportunities.</li> <li>▪ Using national-level environmental and social regulations and procedures when appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Timely informing stakeholders about environmental and social risks during the construction and operational phases.</li> <li>▪ Organizing special meetings for women, the poor, and disabled groups and developing different methods of information dissemination for these vulnerable groups.</li> <li>▪ Fulfilling the requirements, especially those expressed under Article 9 of the current EIA Regulation, related to "Informing the public and participation in the process" as outlined in the regulation.</li> </ul>
<b>ESS2 PS2</b>	Labor and Working Conditions	<ul style="list-style-type: none"> <li>▪ Promoting safety and health in the workplace.</li> <li>▪ Encouraging fair treatment, freedom, and equal opportunities among project employees.</li> <li>▪ Protecting vulnerable, disadvantaged, and at-risk project workers, including migrant workers, contract workers, community workers, and those in the primary supply chain (e.g., women, persons with disabilities).</li> <li>▪ Preventing the use of all forms of forced labor and child labor.</li> <li>▪ Supporting the freedom of association and the principles of collective bargaining for project employees in accordance with national law.</li> <li>▪ Providing accessible means for project employees to voice workplace concerns.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Informing internal (in-house) stakeholders about occupational health and safety.</li> <li>▪ Recognizing equal opportunities at the local and regional levels when announcing recruitment and working conditions.</li> <li>▪ Establishing employee behavior rules and promoting awareness in this regard.</li> <li>▪ Informing and involving all internal stakeholders in communication, training, and participation processes during both the construction and operational phases.</li> <li>▪ Educating and raising awareness among all internal stakeholders about the prevention of forced labor and child labor during both the construction and operational phases.</li> <li>▪ Informing and raising awareness among all internal stakeholders about workplace harassment and discrimination during both the construction and operational phases.</li> <li>▪ Informing and raising awareness among all internal stakeholders about discrimination and harassment based on gender at the workplace during both the construction and operational phases.</li> <li>▪ Informing all internal stakeholders about freedom of association and the principles of collective bargaining during both the construction and operational phases and ensuring an appropriate environment for it.</li> <li>▪ Informing all internal stakeholders about internal grievance mechanisms (internal GRM) and providing access to it during both the construction and operational phases.</li> </ul>
<b>ESS3 PS3</b>	Resource Efficiency and Pollution	<ul style="list-style-type: none"> <li>▪ Promoting the sustainable use of resources, including energy, water, and raw materials.</li> <li>▪ Preventing or minimizing adverse effects on human health and</li> </ul>	<ul style="list-style-type: none"> <li>▪ Timely informing stakeholders about environmental and social risks.</li> <li>▪ Consultations with stakeholders on reducing risks and</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 20 / 37

No	ESS / PS	Requirements	Extent of Stakeholder Engagement
	Prevention	<p>the environment by preventing or minimizing pollution resulting from project activities.</p> <ul style="list-style-type: none"> <li>▪ Preventing or minimizing emissions related to short and long-lived climate pollutants associated with the project.</li> <li>▪ Minimizing and managing risks and effects associated with pesticide use and reducing or minimizing the generation of hazardous and non-hazardous waste.</li> </ul>	<p>increasing positive activities in the information processes.</p> <ul style="list-style-type: none"> <li>▪ Informing stakeholders in the event of potential pollution incidents.</li> <li>▪ Informing stakeholders in the event of potential risks related to chemical usage.</li> </ul>
ESS4 PS4	Community Health, Safety, and Security	<ul style="list-style-type: none"> <li>▪ Anticipating and mitigating adverse effects on the health and safety of communities affected by the project throughout the project's lifecycle.</li> <li>▪ Promoting quality, safety, and climate-related considerations in the design and construction of infrastructure.</li> <li>▪ Preventing or minimizing community exposure to traffic and road safety risks, diseases, and hazardous substances related to the project.</li> <li>▪ Implementing effective measures to address emergency incidents.</li> <li>▪ Ensuring the protection of personnel and property is carried out in a manner that minimizes risks for the communities affected by the project.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Timely informing stakeholders about environmental and social risks.</li> <li>▪ Engaging in consultations with stakeholders on reducing risks and enhancing positive activities in the information processes.</li> </ul>
ESS5 PS5	Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> <li>▪ Preventing involuntary resettlement and, if necessary, evaluating project design alternatives to minimize involuntary resettlement.</li> </ul>	<ul style="list-style-type: none"> <li>▪ There will be no land use outside the designated project area.</li> <li>▪ There will be no economic or physical resettlement carried out as part of the project.</li> <li>▪ If the project falls within the scope of Land Use Restrictions and Involuntary Resettlement, the SEP will need to be revised in accordance with the requirements of ESS5.</li> </ul>
ESS6 PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> <li>▪ Applying the hierarchy of mitigation and a precautionary approach in the design and implementation of projects that may have an impact on biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>▪ There will be no land use outside the boundaries defined within the scope of the project.</li> <li>▪ There is no study conducted within the project to identify biodiversity, living organisms, and natural resources. If areas compliant with the requirements outlined in ESS6 are identified through specific research, institutional opinions, literature reviews, or remote sensing methods, the SEP will need to be revised in accordance with ESS6.</li> </ul>
ESS7 PS7	Indigenous Peoples	<ul style="list-style-type: none"> <li>▪ Ensuring that the development process promotes full respect for the human rights, dignity, identity, culture, and livelihoods based on natural resources of Indigenous Peoples / Historically</li> </ul>	<ul style="list-style-type: none"> <li>▪ Since there are no communities within the country borders that possess the characteristics defined under ESS7, this standard is not applicable to projects implemented in Türkiye.</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 21 / 37

No	ESS / PS	Requirements	Extent of Stakeholder Engagement
		Underserved Traditional Local Communities in Sub-Saharan Africa.	
<b>ESS8 PS8</b>	Cultural Heritage	<ul style="list-style-type: none"> <li>▪ Protecting cultural heritage from the adverse impacts of project activities and supporting its preservation.</li> <li>▪ Addressing cultural heritage as an integral part of sustainable development.</li> <li>▪ Encouraging meaningful consultations with stakeholders related to cultural heritage.</li> <li>▪ Promoting the equitable sharing of benefits derived from the use of cultural heritage.</li> </ul>	<ul style="list-style-type: none"> <li>▪ There will be no land use outside the boundaries defined within the scope of the project.</li> <li>▪ There is no study conducted within the project to identify portable or immovable (concrete) and/or intangible cultural heritage elements. If areas as specified in ESS8 are identified through specialized research, institutional opinions, and literature reviews in the future, the SEP will need to be revised in accordance with ESS8.</li> </ul>
<b>ESS9</b>	Financial Intermediaries (FI)	<ul style="list-style-type: none"> <li>▪ Determining how to assess and manage the environmental and social risks and impacts associated with projects funded by FI.</li> <li>▪ Promoting good environmental and social management practices in FI-funded sub-projects.</li> <li>▪ Encouraging sound environmental and human resource management within FI.</li> </ul>	<ul style="list-style-type: none"> <li>▪ This project is not conducted by intermediary banks (Financial Intermediaries), so the relevant standard is not applicable to this project.</li> </ul>
<b>ESS10</b> <i>PS1.5</i> <i>PS1.25</i> <i>PS1.26</i> <i>PS1.27</i> <i>PS1.29</i> <i>PS1.30</i> <i>PS1.35</i> <i>PS5.10</i> <i>PS6.6</i> <i>PS6.24</i> <i>PS7.5</i>	Stakeholder Engagement and Information Disclosure	<ul style="list-style-type: none"> <li>▪ Identifying project stakeholders.</li> <li>▪ Determining the level of interest and support among stakeholders.</li> <li>▪ Taking into account the views of stakeholders in environmental and social practices.</li> <li>▪ Encouraging stakeholder engagement throughout the project cycle.</li> <li>▪ Ensuring that stakeholders are informed about environmental and social risks and impacts in a timely, understandable, accessible, and appropriate manner.</li> <li>▪ Providing accessible and inclusive tools for raising issues and grievances and facilitating their response and management.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The stakeholders of the project and their levels of interest and support are defined in the Scope section.</li> <li>▪ Stakeholders being informed in a timely manner about environmental and social risks.</li> <li>▪ Consultations with stakeholders regarding the reduction of risks and the increase of positive activities in the information processes are defined under the GRM and detailed separately in the "Grievance Redress Mechanism (CNR-PLN-VRG-GRM-001)" report.</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 22 / 37

### 3. STAKEHOLDER ENGAGEMENT PLAN

The obligations to be followed for internal and external stakeholders are presented in Table 2, Table 3 and Table 4 within the context of the SEP developed specifically for the project. The Stakeholder Action Plan, generated based on these obligations, outlines the relationship with stakeholders through information disclosure methods. Within the framework of this mentioned action plan, the information and disclosure methods detailed in the subheadings will be implemented for the identified stakeholders.

#### 3.1. Stakeholder Identification

##### 3.1.1. Internal Stakeholders

Internal stakeholders, or the primary stakeholders of the Project, are considered as the "affected parties" who are directly affected by or have a high probability of being affected by the Project. In this Project, internal stakeholders encompass all employees, including the Project's subcontractors and supply chain workers. In short, the internal stakeholders of the Project include directly employed workers, contract employees, employees involved in facility-related service procurement, and interns.

VERGO employs "Proservice Global Tesis Yönetim Hizmetleri A.Ş." as a subcontractor in its production process. The subcontractor provides unskilled labor supply during periods of high production. Also, the facility receives catering, security, and transportation services. The employees of service providers within the facility are also defined as internal stakeholders.

The internal stakeholders of the Project are presented in Table 5.

**Table 5. Internal Stakeholder List**

Stakeholder	Relevance to the Project
All VERGO Employees	All employees of the facility where the project will take place.
"Yıldırım Özel Güvenlik Hizmetleri"	It is the service provider that provides security services.
Mesut Erdem (Sole Trader)	It is the service provider that provides transportation services.
"Kimyon Ev Yemekleri & Catering"	It is the service provider that provides catering services.
"Proservice Global Tesis Yönetim Hizmetleri A.Ş."	Subcontractor that provides labour.

The distribution of employees within the facility is as follows:

- The Facility Owner employs 196 people, consisting of 173 blue-collar workers, and 23 white-collar employees.
- Among the white-collar employees, 5 are female and 18 are male, including 1 disabled (women) employee.
- There are no female employees among the blue-collar workers, and 4 out of 173 workers have disabilities.
- Additionally, 26 subcontractor and service staff members work at the facility, including:
  - ◆ 1 female cleaner and 1 male baseman from CS Industrial Cleaning.
  - ◆ 6 male staff members from Yıldırım Private Security.
  - ◆ "Proservice Global Tesis Yönetim Hizmetleri A.Ş." (Subcontractor) employs 18 male staff, regularly. During periods of high production, this number increases. External workers supplied to the facility are on a seasonal basis, ranging from 1 to 3 months. The supplied workers are male blue-collar employees.



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 23 / 37

- Meal delivery services are outsourced to “Kimyon Ev Yemekleri & Catering”, who provides two (2) workers for meal delivery. These employees are present at the facility during food distribution.
- The facility has internship agreements with the Ministry of National Education for two (2) trainees, one of whom completed an internship in the Production-Maintenance Department.

### 3.1.2. External Stakeholders

External stakeholders are considered as "other parties who may be interested in the project" and are stakeholders in the project. Suppliers of raw materials and service providers in the supply chain, buyers in the market, as well as other projects/facilities/companies in similar sectors involved in production and/or sales, universities, non-governmental organizations (NGOs), and media organizations are among the external stakeholders. The list of external stakeholders recognized by VERGO and the list of stakeholders that ÇINAR deems necessary to consider are provided in Table 6.

**Table 6. External Stakeholder List**

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<b>Local Communities</b>		
<ul style="list-style-type: none"> <li>▪ Neighboring facilities in Salihli Organized Industrial Zone</li> <li>▪ Neighboring Vocational Schools</li> </ul>		x
<b>Settlements</b>		
<ul style="list-style-type: none"> <li>▪ Yeşilova Neighborhood</li> <li>▪ Torunlu Neighborhood</li> <li>▪ Mersinli Neighborhood</li> </ul>	x	
<b>Supply Chain Firms</b>	x	x
<b>Potential Customers and Clients</b>	x	x
<b>Government / Authorities</b>		
<ul style="list-style-type: none"> <li>▪ Republic of Türkiye Ministry of Energy and Natural Resources</li> <li>▪ Republic of Türkiye Ministry of Industry and Technology</li> <li>▪ Republic of Türkiye Ministry of Labour and Social Security</li> <li>▪ Manisa Governorship</li> <li>▪ Salihli District Governorate</li> <li>▪ Manisa Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>▪ Manisa Chamber of Commerce and Industry</li> <li>▪ Salihli District Directorate of Ministry of Health</li> <li>▪ Manisa Provincial Directorate of National Education</li> <li>▪ Organized Industrial Zones Superior Institute (OSBÜK)</li> </ul>		x
<b>Lenders</b>		
<ul style="list-style-type: none"> <li>▪ TKYB (Financial Intermediary)</li> <li>▪ World Bank (WB)</li> </ul>	x	x
<b>Municipalities</b>		
<ul style="list-style-type: none"> <li>▪ Salihli Municipality</li> <li>▪ Manisa Metropolitan Municipality</li> </ul>		x
<b>Employees</b>	x	x



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 24 / 37

### 3.1.3. Disadvantaged / Vulnerable Individuals or Groups

In the project, sensitive groups that can exist among both internal and external stakeholders may have disadvantages in terms of economics, education, health, social, and cultural aspects. These groups may include:

- Individuals and families with low income
- Men and women with low levels of education and/or illiteracy
- Men and women with physical and/or mental disabilities
- Men and women in the elderly age group
- Women who are heads of households on their own
- Minorities, refugees, and asylum seekers

It may be necessary to use special and different communication methods within the framework of SEP for individuals in these groups. Therefore, disadvantaged groups should be taken into consideration in ensuring that printed and written documents are inclusive, meaningful, and clear.

#### 1.1.1 Other Interested Parties

Other persons or communities associated with the project are defined as “other interested parties”. National and local government institutions and organizations are accepted as other interested parties of the project. The inclusion of these unforeseen impact groups in the communication network during the project’s credit periods may necessitate the activation of SEP’s different implementation tools.

## 3.2. Information Disclosure Methods

During the operational period, information and explanation methods for communication include informative documents and consultation meetings, both in print and online. These methods for informing and explaining during the operational period include:

- Informative documents such as brochures, posters, leaflets, etc., containing current information about the Project, the contractor, and the facility, including brief informative notes.
- The official Project website where relevant documents are available online.
- Up to date announcements on the official Project website.
- Current announcements on the official social media accounts of the Project.
- Information boards containing warnings and information on occupational health and safety, environment, and waste management to be placed within and around the facility.
- Suggestions, complaints, and feedbacks to be collected via complaint boxes within and around the facility.
- Regular collaboration and consultation meetings with stakeholders on occupational health and safety, environment, and waste management.
- Regular consultation meetings with local and regional institutions and organizations.
- Collaboration and consultation meetings with local and regional relevant institutions regarding employment.
- In-depth interviews and interviews.
- Focus group meetings.
- Information and collaboration meetings covering the supply chain and potential clients.





<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 25 / 37

The details of communication methods and tools can be found within the Grievance Redress Mechanism (CNR-PLN-VRG-GRM-001) document.

### 3.3. Roles and Responsibilities

The Project Owner is committed to informing all affected parties by the Project, especially the impacted communities, local residents, neighboring facilities, and local government authorities, as well as the direct and subcontractor workers about all the processes of significant Project issues. Similarly, the Project Owner has committed to improving direct and indirect employment management in line with the World Bank Environmental and Social Standards (ESS) and International Finance Corporation Performance Standards (PS) as outlined in Table 4 to enhance the participation of both internal and external stakeholders.

An organizational chart illustrating administrative roles and responsibilities within the relevant facility has been shared. The Project Owner will make appointments or assignments for administrative personnel and units included in the organizational chart as part of stakeholder engagement activities. The titles that the Project Owner will appoint or assign according to the organization chart provided in the attachment are listed below, and the information detailing their roles and responsibilities has been shared in Table 7.

- Administrative Affairs
- Human Resources (HR)
- Community Liaison Officer (CLO)
- Workers' Representatives
- Internal GRM Responsibility
- Occupational Health and Safety (OHS) Specialist
- Biodiversity Specialist (if needed)
- Archeologist (if needed)

It should be noted that the intersections of roles and responsibilities outlined in Table 7 in which different tasks may require different methods. Similarly, different stakeholder groups may require different communication methods. Therefore, the designated VERGO employees should share information with stakeholders based on the most suitable communication channels.

The roles and responsibilities specified in Table 7 have been used to create the action table presented in Table 11. This action table should clearly indicate which stakeholders will carry out specific tasks and when. In this way, effective communication and collaboration among project stakeholders can be ensured.

**Table 7. Roles and Responsibilities**

Relevant Units	Roles and Responsibilities	Methods	Stakeholder Groups
<b>Administrative Affairs</b> <b>HR</b> <b>CLO</b> <b>Internal GRM Responsibility</b> <b>OHS Specialist</b>	<ul style="list-style-type: none"> <li>▪ The current status of the project.</li> <li>▪ Recent developments regarding the project.</li> <li>▪ Measures taken to mitigate the environmental and social risks and impacts of the project.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Notice boards</li> <li>▪ In-depth interviews</li> <li>▪ Focus group meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Government Authorities</li> </ul>



Relevant Units	Roles and Responsibilities	Methods	Stakeholder Groups
			(Municipalities, District Governorships) ▪ Lenders (TKYB, WB)
<b>HR</b>	<ul style="list-style-type: none"> <li>▪ The impact of changes in the project on employees</li> <li>▪ Changes in employee rights</li> <li>▪ Informing about working hours and shift systems</li> <li>▪ Prevention of forced labor and child labor</li> <li>▪ Informing about harassment and discrimination in the workplace</li> <li>▪ Informing about gender-based discrimination and harassment in the workplace</li> <li>▪ Sharing opportunities for internal employment within the company and internship opportunities</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Notice boards</li> <li>▪ In-depth interviews</li> <li>▪ Focus group meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> </ul>
<b>OHS Specialist</b>	<ul style="list-style-type: none"> <li>▪ Informing regarding occupational health and safety</li> <li>▪ Informing about emergency intervention procedures</li> </ul>	<ul style="list-style-type: none"> <li>▪ Regular meetings</li> <li>▪ Trainings, Seminars</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Interns</li> <li>▪ Procurement Service Employees</li> </ul>
<b>Administrative Affairs</b> <b>HR CLO</b> <b>Internal GRM Responsibility</b>	<ul style="list-style-type: none"> <li>▪ Informing about environmental and social risks and impacts</li> <li>▪ Informing about resource efficiency and sustainable use of resources</li> <li>▪ Informing about waste management, air quality, and water usage</li> <li>▪ Informing about project-related traffic and road usage data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Notice boards</li> <li>▪ In-depth interviews</li> <li>▪ Focus group meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Interns</li> <li>▪ Procurement Service Employees</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Government Authorities (Municipalities, District Governorships)</li> <li>▪ Lenders (TKYB, WB)</li> </ul>
<b>Workers' Representatives</b>	<ul style="list-style-type: none"> <li>▪ The impact of changes in the project on employees</li> <li>▪ Changes in employee rights</li> <li>▪ Informing about working hours and shift systems</li> <li>▪ Informing about preventing forced labor and child labor</li> <li>▪ Informing about harassment and discrimination in the workplace</li> <li>▪ Informing about gender-based discrimination and harassment in the workplace</li> <li>▪ Informing about anti-corruption and anti-bribery efforts</li> </ul>	<ul style="list-style-type: none"> <li>▪ Bulletin boards</li> <li>▪ Employees' official email accounts</li> <li>▪ Regular meetings</li> <li>▪ Trainings, Seminars</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> </ul>
<b>Administrative</b>	<ul style="list-style-type: none"> <li>▪ The current progress status of the project</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 27 / 37

Relevant Units	Roles and Responsibilities	Methods	Stakeholder Groups
<b>Affairs</b> <b>HR Workers' Representatives</b> <b>Internal GRM Responsibility</b>	<ul style="list-style-type: none"> <li>▪ Recent developments regarding the project</li> <li>▪ The existence and utilization methods of the Internal Grievance Mechanism</li> <li>▪ The existence and utilization methods of the External Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Corporate Magazines</li> <li>▪ Bulletin boards</li> <li>▪ In-depth interviews</li> <li>▪ Focus group meetings</li> <li>▪ Complaint boxes</li> </ul>	<ul style="list-style-type: none"> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Government Authorities (Municipalities, District Governorships)</li> <li>▪ Lenders (TKYB, WB)</li> </ul>
<b>Internal GRM Responsibility</b>	<ul style="list-style-type: none"> <li>▪ The existence and utilization methods of the Internal Grievance Mechanism</li> <li>▪ The existence and utilization methods of the External Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Bulletin boards</li> <li>▪ Intranet</li> <li>▪ Employees' official email accounts</li> <li>▪ Routine meetings</li> <li>▪ Trainings, Seminars</li> <li>▪ Request, grievance, and suggestion boxes placed within the facility and its surroundings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Government Authorities (Municipalities, District Governorships)</li> <li>▪ Lenders (TKYB, WB)</li> </ul>
<b>Administrative Affairs</b>	<ul style="list-style-type: none"> <li>▪ Relationships with supply chain and raw material providers, as well as potential buyers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Brochures, Posters, Presentations</li> <li>▪ Official website</li> <li>▪ Official social media accounts</li> <li>▪ Notice boards</li> <li>▪ In-depth interviews</li> <li>▪ Focus group meetings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> </ul>
<b>Biodiversity Specialist (if needed)</b>	<ul style="list-style-type: none"> <li>▪ Informing about the preservation of living and natural resources, biodiversity (if applicable).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Routine meetings</li> <li>▪ Trainings, Seminars</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> </ul>
<b>Archeologist (if needed)</b>	<ul style="list-style-type: none"> <li>▪ Providing information about cultural heritage assets (if applicable).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Routine meetings</li> <li>▪ Trainings, Seminars</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project Managers</li> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> <li>▪ Interns</li> <li>▪ Nearby Settlements</li> <li>▪ Salihli OIZ Authorities</li> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 28 / 37

### 3.4. Previous Stakeholder Engagement Activities

In this section, the evaluation of the Project Owner's engagement activities for internal and external stakeholders has been carried out. Firstly, information disclosure activities regarding the project have been assessed. Subsequently, the evaluation of the necessary documents for internal stakeholder participation, the grievance mechanism developed to both internal and external stakeholders, and the training activities have been examined. The stakeholder activities during the construction phase at the Salihli Facility lays the groundwork for the Project's operational period.

#### 3.4.1. Information Disclosure

VERGO has its own website<sup>6</sup> which enables digital corporate visibility and adequate information disclosure of the Project. The website provides information about the location, area, and history of the production facility. It also includes a list of the administrative staff. In addition, the website offers necessary information about products and services. VERGO displays the quality standards required for the production process on the same website. Due to its international trade potential, it provides the option of 5 language preferences. The Project Owner's website provides contact information for its offices in İzmir and İstanbul, as well as for the facility located in Salihli OIZ:

**Adress** 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

The Project Owner has also published the previous period's SEP on its website<sup>7</sup>. This file, which is a revision work and the complementary GRM document will be easily accessible to website visitors on the same website. The official logo of the company owner is displayed below.



Figure 2. Corporate Logo of VERGO

<sup>6</sup> Corporate webpage: <http://www.vergo.com.tr/>

<sup>7</sup> <http://www.vergo.com.tr/files/Vergo-SEP-tr.pdf>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 29 / 37

### 3.4.2. Review of the Documents

Documents presented during the monitoring visit by the Project Owner and evaluated in stakeholder engagement processes are listed in below:

- Definite Term Employment Contract (see Appendix 1)
- Employment Document List (see Appendix 1)
- Ethics Policy (see Appendix 1)
- HR Policy in Compliance with IFC PSs (see Appendix 1)
- Indefinite Term Service Contract (see Appendix 1)
- Personnel Wage Calculation Procedure (see Appendix 1)
- Responsible Business Association Policy (see Appendix 1)
- Environment Policy (see Appendix 2)
- Occupational Health and Safety Policy (see Appendix 2)
- Quality Policy (see Appendix 2)
- Employee Feedback Procedure (see Appendix 3)
- External Grievance Management Procedure (see Appendix 3)
- Request, Grievance and Suggestion Form (see Appendix 3)

When examining the Project Owner's HR Policy, it is noted that among the policy's focal points is the commitment to compliance with the Performance Standards set forth by the International Finance Corporation. This commitment entails the regulation of working conditions necessary to prevent child labor, forced labor, and modern slavery.

Personnel hourly wages are calculated by dividing the monthly salary by 225. Overtime hours are defined as exceeding 45 hours per week, and overtime wages are provided at a rate of 150%, in accordance with Article 41 of the Labor Law<sup>8</sup>.

RBA sets standards for ethical behavior, working conditions, and safety in the industry and supply chains. It declares that employees are treated with respect and dignity, and that business operations are conducted in an environmentally responsible and ethical manner.

### 3.4.3. Grievance Redress Mechanism

VERGO has developed separate grievance management procedures for both internal and external stakeholders (see Appendix-3). The procedure outlines the principles, standards, methods, and integration of the grievance management process for resolving external grievances. It defines the roles and responsibilities within the scope of this procedure and outlines all stages of the mechanism for both external stakeholders and direct/indirect employees. The level of the grievance is determined by the CLO, and responsibilities are allocated based on the nature of the received grievance.

In the grievance mechanism for internal stakeholders, feedback, suggestions, and grievances are regularly evaluated. The goal is to determine what improvements are necessary based on the findings obtained. Improvements are planned according to their level of importance. Feedback is provided to the employee who submitted feedback, suggestions, or grievances as needed. Responsibilities for internal grievances have been assigned to the Quality Manager, Quality Engineer, and department managers.

---

<sup>8</sup> National Labor Law No: 4857 <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.4857.pdf> Access Date: September 2023.



ÇINAR has updated the grievance mechanism owned by VERGO to enhance its functionality and ensure effective monitoring during the operational period. This updated mechanism has been presented as a separate document (see CNR-PLN-VRG-GRM-001), and necessary instructions have been added to the Stakeholder Action Plan (see Table 11) within this SEP.

### 3.4.4. Training Programs and Seminars

VERGO has shared its training calendar for the year 2023 with ÇINAR and is actively monitoring it. VERGO has scheduled a series of training sessions throughout the year aimed at improving customer satisfaction and production standards. These training sessions have been prepared for all personnel, including the production unit, and are being managed accordingly.

Recommended training sessions aimed at improving the Project’s social compliance to the Performance Standards and enabling VERGO to make significant progress during the operational phase with the engagement of internal stakeholders are primarily focused on internal stakeholders. These training sessions are detailed in Table 8.

**Table 8. Trainings and Seminar Subjects**

Respective Units	Subject
<b>Administrative Affairs</b> <b>HR</b> <b>CLO</b> <b>Internal GRM Responsibility</b>	<ul style="list-style-type: none"> <li>▪ World Bank Environmental and Social Framework</li> <li>▪ United Nations Sustainable Development Goals</li> <li>▪ Environmental and Social Risk Assessment Procedure in the Lending Process</li> <li>▪ Project management</li> <li>▪ Management of Environmental and Social Risks</li> <li>▪ Quality System</li> <li>▪ Sustainable Development</li> <li>▪ Data security</li> </ul>
<b>HR</b> <b>CLO</b> <b>Internal GRM Responsibility</b> <b>Workers’ Representatives</b>	<ul style="list-style-type: none"> <li>▪ Employee Rights</li> <li>▪ Human Resources Policy and Procedure</li> <li>▪ World Bank Environmental and Social Framework</li> <li>▪ Preventing Discrimination and Harassment Incidents in Workplaces</li> <li>▪ Preventing Gender-Based Violence and Harassment</li> <li>▪ Preventing Forced Labor, Child Labor, and Modern Slavery</li> <li>▪ Fighting Bribery and Corruption</li> </ul>
<b>OHS Specialist</b>	<ul style="list-style-type: none"> <li>▪ Occupational health and Safety</li> <li>▪ Emergency Response</li> </ul>
<b>CLO</b>	<ul style="list-style-type: none"> <li>▪ Waste and Wastewater Management</li> <li>▪ Air Quality Management</li> <li>▪ Noise Management</li> <li>▪ Resource Efficiency</li> <li>▪ Sustainable Resource Management</li> </ul>
<b>HR</b> <b>CLO</b> <b>Internal GRM Responsibility</b> <b>Workers’ Representatives</b>	<ul style="list-style-type: none"> <li>▪ World Bank Environmental and Social Framework</li> <li>▪ United Nations Sustainable Development Goals</li> <li>▪ sustainable development</li> <li>▪ Internal and External CGM Procedure</li> <li>▪ Stakeholder Engagement Plan</li> </ul>
<b>Biodiversity Specialist (if needed)</b>	<ul style="list-style-type: none"> <li>▪ Protection of Living and Natural Resources and Biodiversity</li> </ul>
<b>Archeologist (if needed)</b>	<ul style="list-style-type: none"> <li>▪ Cultural Heritage Management</li> </ul>



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 31 / 37

### **3.4.5. Field Studies**

As stated in the ESAP and in line with the contract, environmental and social monitoring studies should be carried out twice a year during the operation period. Monitoring activities performed by ÇINAR has allowed for regular tracking of corporate interactions.

#### **November 3, 2022**

The worker's representative interviewed during the site visit was asked to share additional views regarding the stakeholder engagement performance of the Project, and the feedback was quite positive. The representative stated that VERGO regularly holds consultations with employees and makes efforts to find solutions for their concerns and grievances.

#### **May 16, 2023**

As part of the stakeholder engagement and Grievance Redress Mechanism evaluations, a meeting was held with the Human Resources Department on May 16, 2023. During this meeting, key topics discussed included the status of the Project and credit processes, stakeholder engagement and GRM, employee numbers, union activities, employee benefits such as meals, accommodation, and transportation, shift systems, fringe benefits, overtime, and wage payment conditions, increasing women's participation in employment, preventing child labor, and forced labor, and promoting the employee grievance mechanism. Practices related to interns were also addressed.

The worker's representatives provided information about working conditions, the protection of worker rights, the presence of child workers (under 18 years old), and interns. Additionally, insights were sought regarding the functioning of the internal employee grievance mechanism, along with supplementary perspectives on the internal key performance indicators for implementing stakeholder engagement within the Project.

#### **August 7, 2023**

Telephone interviews were carried out by phone with the mukhtars (local neighborhood representatives) from the three closest settlements, namely Torunlu, Yeşilova, and Mersinli neighborhoods, on August 7, 2023. These discussions aimed to collect information about the socio-economic characteristics of the neighborhoods and assess the favorable or unfavorable interactions between the Project and the OIZ.

#### **September 15, 2023**

On September 15, 2023, interviews were conducted with 5 blue-collar (male) employees to gather supplementary information regarding working conditions and management. The content of these interviews included discussions about working hours, wage and fringe benefit determination, employment processes, overtime practices and charges, worker's representatives, unionization, the use of grievance boxes, disadvantaged groups, on-site facilities, and information about supply chain workers.

The highlighted details from the interviews in 2023 with internal (employees) and external stakeholders (especially nearby settlements) are explained in the subheadings indicated in Table 6 and Table 9.



**Table 9. Internal Stakeholder Interviews**

<b>Subjects</b>	<b>Findings</b>
<b>Announcement of Employment Opportunities</b>	<ul style="list-style-type: none"> <li>Employees are typically recruited from nearby local communities.</li> <li>All blue-collar workers interviewed have submitted individual (face-to-face) job applications. Applications can also be made through the website.</li> </ul>
<b>Working Conditions</b>	<ul style="list-style-type: none"> <li>Employees have not expressed any negative comments regarding the determination of wages and benefits. Sufficient information is provided at the beginning of employment on these matters.</li> <li>Blue-collar employees work in two (2) shifts per day (8:00 AM-4:00 PM and 4:00 PM-12:00 AM) for six days a week, with Sunday as their day off. White-collar employees work in a single day shift.</li> <li>Overtime rates have been set at 150% for weekdays and 200% for weekends.</li> </ul>
<b>OHS Implementations</b>	<ul style="list-style-type: none"> <li>Employees are well-versed in the necessary Personal Protective Equipment (PPE), and VERGO provides all required equipment for its employees.</li> <li>Health and Safety experts are consistently involved in monitoring procedures.</li> <li>It has been stated that great care is taken in maintaining records of workplace accidents and near-miss incidents.</li> </ul>
<b>Employee Rights and Wages</b>	<ul style="list-style-type: none"> <li>There is one (1) worker's representative at the facility. Employees primarily relay their grievances to their foremen, who then communicate them to the worker's representative.</li> <li>Employees do not have unions. Information has been received about a unionization application, but negotiations between VERGO and the union have not yet commenced.</li> </ul>
<b>Protecting Workforce</b>	<ul style="list-style-type: none"> <li>No child labor has been observed at the facility, and employees have confirmed that there are no workers under the age of 18.</li> <li>It has been stated that there is no physical or psychological coercion experienced in the workplace.</li> <li>There are no female employees among the blue-collar workers. There are no obstacles to employing women.</li> <li>There have been no cases of collective dismissals.</li> </ul>
<b>Internal GRM</b>	<ul style="list-style-type: none"> <li>An internal GRM has been developed for employees. Employees are generally trained to verbally communicate their grievances. (Recommendations for the internal GRM are detailed in CNR-PLN-VRG-GRM-001.)</li> </ul>
<b>Workers Engaged by Third Parties</b>	<ul style="list-style-type: none"> <li>The employees of the procurement service and supply-chain firms within the facility have equal rights as the employees of the Project Owner.</li> </ul>
<b>Trainings</b>	<ul style="list-style-type: none"> <li>Basic HR training is provided to employees. External training is only provided for the quality unit.</li> </ul>

**Table 10. External Stakeholder Interviews**

<b>Subjects</b>	<b>Findings</b>
<b>Opinions about the Project</b>	<ul style="list-style-type: none"> <li>External stakeholders view the project positively and believe it will support regional development.</li> <li>There have been no disputes or similar issues within the Organized Industrial Zone.</li> </ul>
<b>Information Disclosure</b>	<ul style="list-style-type: none"> <li>It has been determined that there is insufficient information regarding the progress of the project and the implementation of internal and external GRM.</li> </ul>
<b>External GRM</b>	<ul style="list-style-type: none"> <li>At the corporate level, external grievances or requests are conveyed via email.</li> <li>Settlements prefer face-to-face communication through telephone or local representatives (mukhtars).</li> </ul>
<b>Potential Impacts</b>	<ul style="list-style-type: none"> <li>There are no grievances related to air, water, or noise pollution. The roads used by the project do not intersect with residential areas. The employment opportunities provided by the project are positively evaluated.</li> </ul>





### 3.5. Grievance Redress Mechanism

The primary objective of the Grievances Redress Mechanism is to gather grievances, opinions, suggestions, feedback, and questions related to environmental and social impacts and create a guide on how necessary actions will be taken. In line with this objective, there will be separate collection and evaluation processes for internal stakeholders through the Internal Stakeholder GRM and for external stakeholders through the External Stakeholder GRM. A general GRM flowchart is shown below (see Figure 3).

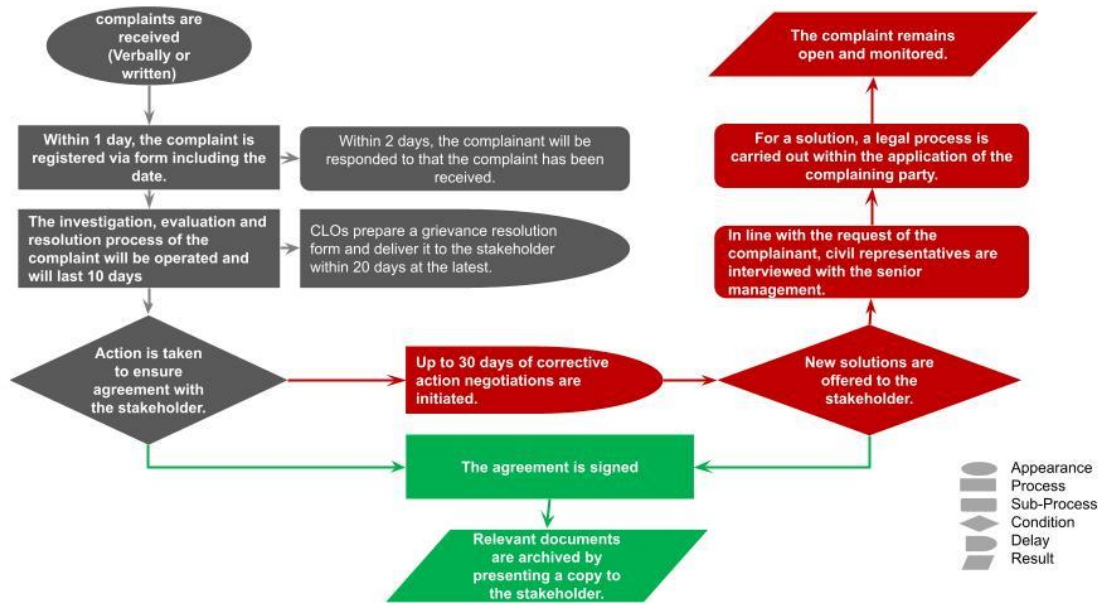


Figure 3. GRM Flowchart

The main responsibilities lie with teams consisting of Project management, the Human Resources Department, the Community Liaison Officer, and the GRM implementers. The GRM implementers, as a team of social experts, take on the primary responsibility for the overall GRM. Internal Stakeholder GRM implementers are HR employees, while External Stakeholder GRM implementers can be two individuals, preferably one male and one female, from the Community Liaison Officer's team.

For details regarding both internal and external Grievance Redress Mechanisms, please refer to the separate document titled CNR-PLN-VRG-GRM-001.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 34 / 37

#### 4. MONITORING AND REPORTING

Monitoring and reporting activities will be conducted in accordance with national and international requirements as outlined in Table 2, Table 3 and Table 4. These requirements will serve as the basis for the Stakeholder Action Plan's monitoring and reporting sections, presented in Table 11, which have been developed based on the alignment of these requirements with the Stakeholder Engagement Dimension of the Project. The actions identified within the framework of stakeholder engagement dimensions set by national and international requirements, along with the monitoring and reporting periods and responsible parties, are detailed in the action table below (see Table 11).

In stakeholder engagement activities, the stakeholders are defined in Table 5 and Table 6. And the roles and responsibilities of the designated administrative leads and relevant stakeholders are summarized in Table 7. The specifics of the relevant data are provided in the Stakeholder Action Plan (see Table 11) below. This Stakeholder Action Plan serves as a comprehensive guide for monitoring and reporting activities, ensuring compliance with the established requirements and the involvement of relevant stakeholders in the Project's various dimensions.

The roles and responsibilities specified in Table 7 have been used to create the action table presented in Table 11. This action table should clearly indicate which stakeholders will carry out specific tasks and action frequency. In addition, the actions deemed necessary to be implemented are the practices determined to increase engagement with internal and external stakeholders during the operation phase of VERGO. In this way, effective communication and collaboration among project stakeholders can be ensured.



Table 11. Stakeholder Action Plan

No	Respective Units	Stakeholder Engagement Activity	Information and Methods	Disclosure Development	Stakeholder Groups	Implementation Frequency	Monitoring/Reporting Method	Key Performance Indicators	Monitoring Frequency	Monitoring Responsible	Reporting Responsible
SEP-01	Administrative Affairs HR Internal GRM Responsibility Workers' Representatives	Internal Stakeholder Information Disclosures: <ul style="list-style-type: none"> <li>Current status of the project</li> <li>Effect of changes in the project on employees</li> <li>Establishing employee code of conduct and raising awareness on this issue</li> <li>Information about occupational health and safety</li> <li>Preventing forced labor and child labor</li> <li>Information about harassment and discrimination in the workplace</li> <li>Information about discrimination and harassment based on gender in the workplace.</li> <li>Sharing in-company employment opportunities and internship opportunities</li> <li>Information about the Internal Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>Notice boards</li> <li>Informational meetings and trainings</li> </ul>		<ul style="list-style-type: none"> <li>Direct Project Employees</li> <li>Subcontractor Employees</li> <li>Procurement Service Employees</li> <li>Interns</li> <li>TKYB and WB</li> </ul>	Once in a year	Minutes of publications, papers and/or meetings (date, subject, number of participants)	<ul style="list-style-type: none"> <li>Informed internal stakeholders on relevant issues</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /
SEP-02	Administrative Affairs CLO	External Stakeholder Information Disclosures: <ul style="list-style-type: none"> <li>Content and current status of the project</li> <li>Potential impacts of the project on local livelihoods, consultations on solutions (if any)</li> <li>Sharing local employment opportunities and internship opportunities</li> <li>Informing about the external grievance mechanism.</li> <li>Providing information about TKYB and DB's grievance redressal services.</li> </ul>	<ul style="list-style-type: none"> <li>Conducting meaningful and inclusive consultations by organizing the internal Stakeholder Engagement Meeting</li> <li>Publication on the website of SEP and GRM</li> <li>Bulletin Boards</li> <li>Website and social media posts</li> </ul>		<ul style="list-style-type: none"> <li>Nearby Settlements</li> <li>Salihli OIZ Authorities</li> <li>Supply Chain and/or Raw Material Suppliers</li> <li>Potential Customers / Clients</li> <li>Government Authorities (Municipalities, District Governorships)</li> <li>TKYB and WB</li> </ul>	Once in a year	Minutes of publications, papers and/or meetings (date, subject, number of participants)	<ul style="list-style-type: none"> <li>Increased awareness of stakeholders about the project's timeline, impacts and benefits,</li> <li>Informing about the external grievance mechanism</li> <li>Priority is given to local residents in new recruitments.</li> <li>While complaints decrease, the number of questions-opinions-suggestions increases</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /
SEP-03	HR Internal GRM Responsibility Workers' Representatives	Internal GRM Enhancements and Implementations: <ul style="list-style-type: none"> <li>Revision of the existing internal GRM according to the GRM prepared by ÇINAR.</li> <li>Disclosure and Implementation of Internal Grievance Mechanism</li> <li>Grievance form</li> <li>Reception channel of grievances</li> <li>Grievance Mechanism timeline</li> <li>Corrective action activities</li> <li>Grievance Log tracking</li> <li>Providing information about TKYB and DB's grievance redressal services</li> </ul>	<ul style="list-style-type: none"> <li>Notice boards</li> <li>Informational meetings and trainings organized by the HR unit</li> <li>Routine internal company meetings</li> </ul>		<ul style="list-style-type: none"> <li>Direct Project Employees</li> <li>Subcontractor Employees</li> <li>Procurement Service Employees</li> <li>Interns</li> </ul>	Once in 6 months	Enhancement and implementation of a registration system for internal grievances	<ul style="list-style-type: none"> <li>Implementation of the project grievance mechanism,</li> <li>Recording and tracking of every stage of grievances in order to redress them.</li> <li>Necessary actions have been taken for grievances</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /
SEP-04	CLO	External GRM Enhancements and Implementations: (It should be open to Local communities	<ul style="list-style-type: none"> <li>Conducting meaningful and inclusive consultations by organizing the external</li> </ul>		<ul style="list-style-type: none"> <li>Nearby Settlements</li> <li>Salihli OIZ Authorities</li> <li>Supply Chain and/or</li> </ul>	Once in a year	Enhancement and implementation of a registration system for external grievances	<ul style="list-style-type: none"> <li>Implementation of the project specific grievance mechanism,</li> <li>Recording and tracking</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /



No	Respective Units	Stakeholder Engagement Activity	Information Disclosure and Development Methods	Stakeholder Groups	Implementation Frequency	Monitoring/Reporting Method	Key Performance Indicators	Monitoring Frequency	Monitoring Responsible	Reporting Responsible
		and neighboring facilities etc.) <ul style="list-style-type: none"> <li>▪ Revision of the existing external GRM according to the GRM prepared by ÇINAR. In particular, providing anonymous grievance opportunities, improving the recording, and tracking system, and providing training to ensure employee awareness of use.</li> <li>▪ Disclosure and Implementation of external Grievance Mechanism</li> <li>▪ Grievance form</li> <li>▪ Reception channel of grievances</li> <li>▪ Grievance Mechanism timeline</li> <li>▪ Corrective action activities</li> <li>▪ Grievance Log tracking</li> <li>▪ Providing information about TKYB and DB's grievance redressal services</li> </ul>	<ul style="list-style-type: none"> <li>▪ Stakeholder Engagement Meeting</li> <li>▪ Publication on the website of SEP and GRM,</li> <li>▪ Bulletin Boards</li> <li>▪ Website and social media posts</li> </ul>	<ul style="list-style-type: none"> <li>▪ Raw Material Suppliers</li> <li>▪ Potential Customers / Clients</li> <li>▪ Government Authorities (Municipalities, District Governorships)</li> <li>▪ TKYB and DB</li> </ul>			<ul style="list-style-type: none"> <li>▪ of every stage of grievances to resolve them,</li> <li>▪ Necessary actions have been taken for grievances,</li> <li>▪ Grievances have decreased over time.</li> </ul>			
<b>SEP-05</b>	<b>Administrative Affairs</b>	It is suggested that the following clauses be included in the business agreements (Supply Chain, Procurement Services, and Sub-Contractors) to be drafted by the Project Owner, in alignment with the IFC's Performance Standards which is adopted in its HR Policy: <ul style="list-style-type: none"> <li>▪ Equal Working Conditions, Wages and Fringe Benefits</li> <li>▪ Non-Discrimination and Equal Opportunities</li> <li>▪ Retrenchment</li> <li>▪ Access to Grievance Mechanism</li> <li>▪ Preventing child labour</li> <li>▪ Preventing Forced Labor and Modern Slavery</li> </ul>	<ul style="list-style-type: none"> <li>▪ The updating of service procurement or subcontractor contracts for future business operations.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Supply Chain and/or Raw Material Suppliers</li> <li>▪ Subcontractors</li> <li>▪ Procurement Service Providers</li> </ul>	Once after SEP is approved	Revised Contract Samples	<ul style="list-style-type: none"> <li>▪ Supply Chain and/or Raw Material Supplier Contract Update</li> <li>▪ Subcontractors</li> <li>▪ Procurement Service Providers' Contract Update</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /
<b>SEP-6</b>	<b>HR</b>	Workers' representatives must be in number in accordance with national regulations <sup>9</sup> . Considering VERGO's total employees, it is recommended to elect three (3) representatives.	<ul style="list-style-type: none"> <li>▪ Minutes of Workers' Representative Elections</li> <li>▪ Worker's Representative Appointment Letter</li> </ul>	<ul style="list-style-type: none"> <li>▪ Direct Project Employees</li> <li>▪ Subcontractor Employees</li> <li>▪ Procurement Service Employees</li> </ul>	Once in a year	Adequate amount of Workers' Representative	<ul style="list-style-type: none"> <li>▪ Adequate amount of Workers' Representative</li> </ul>	Once in six (6) months	TKYB Consultant /	VERGO Consultant /

<sup>9</sup> Communiqué on the Qualifications and Selection Procedures and Principles of Worker's Representatives related to Occupational Health and Safety. <https://www.resmigazete.gov.tr/eskiler/2013/08/20130829-5.htm> Access Date: September 2023



<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-VRG-SEP-001</b>
REV.01	Date: OCTOBER 2023	Page 37 / 37

## 5. REVIEW AND UPDATE

This Stakeholder Engagement Plan is a living document and will be updated based on foreseeable and unforeseeable new impacts and stakeholders that may arise in different stages of the Project. Possible scenarios that could necessitate the restructuring of the Stakeholder Engagement Plan are listed below:

**New Land Acquisition:** New land acquisitions may lead to direct or indirect impacts on the region's living standards and livelihoods.

**Cultural Heritage:** If movable or immovable tangible cultural heritage assets or intangible cultural heritage resources are identified or affected during Project activities, the plan should be updated.

**Biodiversity:** The identification of biodiversity elements, the need to protect and relocate endemic and sensitive species during Project activities may require plan revisions.

**Environmental Sensitivity:** Issues that could alter environmental sensitivity, such as resource efficiency practices, greenhouse gas emissions, and carbon footprint studies, should prompt plan updates.

**Sociodemographic Changes:** The effects of sociodemographic and socioeconomic changes in the region should be considered when revising the plan.

**Current Stakeholder Groups:** New stakeholder groups that may gain visibility at different stages of the Project, particularly in the supply chain, potential customer base, and collaborations with other institutions, should be taken into account.

**Natural Disasters:** The plan should be updated due to the pressures of natural disasters like earthquakes, floods, or forest fires on public services, infrastructure, and housing.

**Security and Pandemics:** Revisions may be necessary in response to security deficiencies (e.g., terrorism, sabotage, cyberattacks) or restrictions and regulations resulting from pandemics (e.g., Covid-19).

**State of Emergency:** Plan should be updated considering any restrictions and regulations that may be imposed by authorities due to states of emergency affecting the region or the entire country.

These scenarios emphasize the need for a flexible and responsive approach to managing the Stakeholder Engagement Plan, ensuring that any changes can be implemented swiftly when necessary. This way, effective communication and collaboration can be sustained throughout the Project.

