



KIYIKOY WIND POWER PLANT CAPACITY EXTENSION PROJECT

Stakeholder Engagement Plan (SEP)

ALENKA Enerji Uretim ve Yatirim A.Ş.

October 2019

Project	Details	
Reference	E19_002	
Name	Stakeholder Engagement Plan (SEP) for Kiyikoy Wind Power Plant Capacity Extension Project	
Submitted to (Client)	Borusan EnBW	
Prepared by	GEM Sustainability Services and Consultancy Inc. www.gemtr.com SRM Consulting http://www.srmdanismanlik.com/	
Revision No.	Revision Date	Revision Detail
01	8 October 2019	SEP for Public Disclosure

This document has been prepared by GEM Sürdürülebilirlik Hizmetleri ve Danışmanlık A.Ş. ("GEM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles and the terms of reference agreed between GEM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by GEM, unless otherwise explicitly stated in this document. No third party may rely upon this document without the prior and written agreement of GEM.

© 2019 GEM Sürdürülebilirlik Hizmetleri ve Danışmanlık A.Ş. All Rights Reserved.

Table of Contents

1. INTRODUCTION	7
1.1. Objectives of the SEP	8
1.2. Structure of the SEP	9
2. PROJECT DESCRIPTION.....	10
2.1. Project Background	10
2.2. Project Location.....	11
2.3. Social Context	12
3. NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS APPLICABLE TO STAKEHOLDER ENGAGEMENT	16
3.1. National Legislation	16
3.2. EBRD's Policy and PRs (2014) Principles	17
3.3. Corporate Policies and Procedures	18
4. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES.....	20
4.1. Stakeholder Engagement in the Pre-ESIA Process	20
4.2. Stakeholder Engagement as part of the ESIA Process	23
5. STAKEHOLDER IDENTIFICATION	27
6. ROLES AND RESPONSIBILITIES.....	30
7. STAKEHOLDER ENGAGEMENT PLAN.....	34
7.1. External Stakeholders.....	34
7.1.1. ESIA Disclosure	34
7.1.2. ESIA Disclosure Meetings.....	38
7.1.3. Post ESIA Period	38
8. GRIEVANCE MECHANISM	43
8.1. Grievance Mechanism for Public	43
8.2. Grievance Mechanism for Internal Stakeholders.....	46
9. MONITORING AND REPORTING	47
10. CONTACT INFORMATION FOR THE STAKEHOLDERS	48
APPENDICES.....	49
APPENDIX A. CONTACT INFORMATION OF STAKEHOLDERS.....	49
APPENDIX B. SAMPLE STAKEHOLDER ENGAGEMENT LOG	51
APPENDIX C. GRIEVANCE/COMMENT FORMS.....	52
C.1. GRIEVANCE/COMMENT FORM (NOTIFICATION AND COMMUNICATION OPENING FORM)	52
C.2. GRIEVANCE/COMMENT CLOSE OUT FORM (NOTIFICATION AND COMMUNICATION OPENING FORM)	54

List of Tables

Table 2-1. Settlements Located near the License Area.....	11
Table 4-1. Governmental Stakeholders Involved in the Scoping, Review and Evaluation of the national EIA Process.....	20
Table 4-2. Governmental Stakeholders Involved in the Zoning Process.....	21
Table 4-3. Summary of the Stakeholder Engagement Activities Conducted as part of the ESIA	23
Table 4-4. Field Study Summary (see Table 4-5 for the detailed specific stakeholders consulted)	24
Table 4-5. List of the Stakeholders Consulted.....	25
Table 5-1. Project Stakeholder Groups	27
Table 6-1. Roles and Responsibilities of the Project ESMS Team related to SEP and Grievance Mechanism Implementation	31
Table 7-1. Stakeholder Engagement Plan for the ESIA Disclosure Period (Prior to Start of Construction)	36
Table 7-2. Stakeholder Engagement Plan during the Construction and Operation Phases (Post ESIA Period).....	39
Table 9-1. SEP Monitoring Framework for Kiyikoy WPP	47

List of Figures

Figure 2-1. Project Location	14
Figure 2-2. Social Study Area	15
Figure 3-1. Stakeholder Engagement and Disclosure Requirements as per the Turkish EIA Regulation.....	16
Figure 3-2. Social Issues Process Diagram Applied at Project Level (Applicable to Kiyikoy WPP)	19
Figure 6-1. Kiyikoy WPP Project ESMS Team	30

ABBREVIATIONS

Abbreviation	Definition
ALENKA	ALENKA Enerji Üretim ve Yatırım A.Ş.
asl	Above Sea Level
BD	Borusan Danışmanlık Ortak Hizmetleri A.Ş.
BEE	Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. and Borusan Danışmanlık Ortak Hizmetleri A.Ş.
CLO	Community Liaison Officer
E&S	Environmental and Social
EBRD	The European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ETL	Energy Transmission Line
GEM	GEM Sustainability Services and Consultancy Inc.
GIP	Good Industry Practice
HQs	Headquarters
ISO	International Standards Organisation
KBA	Key Biodiversity Area
LRP	Livelihood Restoration Plan
MoEU	Ministry of Environment and Urbanization
NGO	Non-governmental Organisation
NTS	Non-technical Summary
PAP	Project Affected Person
PDF	Project Description File
PR	Public Relations
Project Company	ALENKA Enerji Üretim ve Yatırım A.Ş.
SAP	Systems, Applications and Products
SEP	Stakeholder Engagement Plan
SMC	Social Monitoring Committee
SMS	Short Message Service
SRM	Social Risk Management Consultancy Limited Company
SPV	Special Purpose Vehicle
The Bank	The European Bank for Reconstruction and Development
TEIAS	Turkish Electricity Transmission Company
WPP	Wind Power Plant

1. INTRODUCTION

Kiyikoy Wind Power Plant ("Kiyikoy WPP" or the "Plant") is located in Vize district of Kırklareli province in the northwestern part of Turkey. ALENKA Enerji Üretim ve Yatırım A.Ş. ("ALENKA" or the "Project Company"), a special purpose vehicle (SPV) established for the development of the Project by the previous owner of the Project, has been operating the first phase of the Kiyikoy WPP with an installed capacity of 28 MWm/27 MWe (14 turbines, 2 MWm each) since August 2014.

On 1 December 2017, Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. ("BEE") and Borusan Danışmanlık Ortak Hizmetleri A.Ş. ("BD") (jointly referred to as "Borusan" or "BEE") acquired the Kiyikoy WPP from its previous owner, AKSA Enerji Üretim A.Ş., and became the sole owner of the Project.

BEE, through the Project Company, considers increasing the total installed capacity of the Project to 100 MWm/99 MWe as part of the Kiyikoy WPP Capacity Extension Project (the "Capacity Extension Project"). Accordingly, the Project Company plans to construct and operate an additional capacity of 72 MWm/72 MWe. The Project Company initially considered 21 turbines, but the technological advancements have allowed the Company to build and operate this additional capacity with 20 turbines, each having a capacity of 3.6 MWm. Following the construction and commissioning of the Capacity Extension Project, the Kiyikoy WPP will have a total installed capacity of 100 MWm/99 MWe to be provided by a total of 34 turbines (including the existing 14 turbines and the 20 new turbines to be built and operated as part of the Capacity Extension Project)¹.

BEE is considering international and national finance for the implementation of the Project. The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") as the potential lender of the Project, has assigned the Kiyikoy WPP Capacity Extension Project as Category A as it involves further expansion and development of a greenfield WPP located close to a major bird migratory route (via Pontica).

GEM Sustainability Services and Consultancy Inc. ("GEM") has been retained in March 2019 to undertake a comprehensive Environmental and Social Impact Assessment (ESIA) process for the Project. The social baseline, assessment and reporting studies have been conducted by the Social Risk Management (SRM) Consultancy Limited Company ("SRM") contracted by GEM. This Stakeholder Engagement Plan (SEP) has been prepared for the Kiyikoy WPP as part of the ESIA process.

This SEP has been developed as a public document, to present plans for stakeholder engagement, consultation and disclosure in line with the requirements of the applicable national legislation, EBRD's E&S Policy and PRs (2014) and environmental and social policies of BEE and the Project Company.

This SEP will be applicable throughout the Project life including the construction (of Capacity Extension Project units), operation and closure phases. It is a living document, which is to be reviewed and updated by the Project Company as needed, at least annually. It should be read in conjunction with the ESIA Report and the E&S Management Plans developed for the Project.

¹ As of September 2019, the Company is in the process of selecting the ultimate 20 turbines to be built and operated as part of the Project; as such one of the 21 turbines considered in the initial Capacity Extension Project will be eliminated before the finalisation of the Project design.

1.1. Objectives of the SEP

The objectives of this SEP for the Kiyikoy WPP Project are to ensure that Project Affected Persons (PAPs), internal stakeholders (direct and contracted workers of the Project) and other interested stakeholders are provided with relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its potential E&S impacts.

The stakeholder engagement process under the SEP has been designed to help:

- identify and involve all potentially affected and interested stakeholders,
- generate a good understanding of the Project among those that will be affected,
- identify issues early in the Project cycle that may pose risks to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective and efficient),
- establish a system for long-term communication between the Project and communities that is of benefit to all parties.

Specifically, the SEP aims to:

- define a consultation approach for stakeholders in relation to land preparation, construction, operation, and closure phases of the Project to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's environmental and social impacts,
- identify resources and responsibilities for implementation and monitoring of the consultation program,
- set up a grievance mechanism for the external stakeholders, including a process to address views and concerns,
- provide an effective grievance mechanism for the Project's internal stakeholder (direct and contracted workers) to raise their workplace concerns.

The SEP will guide the Project Company towards implementing a structured stakeholder consultation and engagement during all stages of the Project implementation. In line with the SEP, the Project Company is committed to engaging openly and actively with the local communities, governmental/non-governmental organisations and Project workers (direct and contracted) on all Project-related subjects and activities including the existing operations, Capacity Extension construction works and operation of the WPP at full capacity after the commissioning of Capacity Extension Project units in a manner that is consistent with the EBRD's E&S Policy and PRs (2014) and other applicable good international practice (GIP) as outlined in next sections.

1.2. Structure of the SEP

Contents of this SEP include the following:

- Chapter 2: Project Description
- Chapter 3: National Legislation and International Standards Applicable to Stakeholder Engagement
- Chapter 4: Previous Stakeholder Engagement Activities
- Chapter 5: Stakeholder Identification
- Chapter 6: Roles and Responsibilities
- Chapter 7: Stakeholder Engagement Plan
- Chapter 8: Grievance Mechanism
- Chapter 9: Monitoring and Reporting
- Chapter 10: Contact Information for the Stakeholders

2. PROJECT DESCRIPTION

2.1. Project Background

The Energy Market Regulatory Authority (EMRA) granted an Energy Generation License ("License") to the Project on 4 April 2007 ("License Date") on behalf of the Project Company. This License (License No: EU/1149-3/823) has authorized the Company for electricity generation for 49 years ("License Duration") starting from the License Date.

The Project Description File (PDF) was prepared in line with the Environmental Impact Assessment (EIA) Regulation in force for the first phase of the Project ("existing Kiyikoy WPP Project") with an installed capacity of 28 MWm/27 MWe provided by 18 turbines (each turbine with a capacity of 1.5 MW). An "EIA not Required" Decision was secured from the Kırklareli Provincial Directorate of Environment and Urbanization (the provincial organisation of the Ministry of Environment and Urbanization – MoEU) on 8 May 2009 (Decision No: 2009/07).

Following the "EIA not Required" Decision, the site wind measurements continued leading to the optimization of the Project design. The final design completed by the Project Company based on the optimisation analyses included 14 turbines (2 MWm each) providing the same total installed capacity of 28 MWm/27 MWe. The Project Company applied to the MoEU and obtained an official letter on 2 May 2013 confirming that the "EIA not Required" Decision granted on 8 May 2009 is valid for the final design with 14 turbines (2 MWm each) as the total installed capacity of the Project has not changed.

In August 2014, the existing Kiyikoy WPP Project started commercial operation. Following this, the potential for a capacity extension was assessed by the Project Company and it was concluded that the installed capacity of the WPP can be extended up to 100 MWm/99 MWe with the construction and operation of 20 additional turbines (3.6 MWm each) making a total of 34 turbines.

The EIA Regulation in force required an EIA Report to be prepared for the Capacity Extension Project. The Project Company made an EIA application to the MoEU. Upon completion of the EIA process, the MoEU granted an "EIA Positive Decision" on 14 September 2017 (Decision No: 4763) to the Kiyikoy WPP Capacity Extension Project. The "EIA Positive Decision" has allowed the Company to increase the existing capacity of the Kiyikoy WPP from 28 MWm/27 MWe to 100 MWm/99 MWe.

Following the "EIA Positive Decision", the coordinates and/or codes of certain turbines have changed as a result of the Project development and ongoing license amendment process with the EMRA. The Project Company applied to the MoEU and obtained an official letter on 25 January 2019 confirming that the "EIA Positive Decision" granted for the Capacity Extension Project on 14 September 2017 is valid for the revised coordinates of the turbines and a total capacity of 100.45 MWm/99.45 MWe.

As of September 2019, pre-construction planning and final design and engineering studies as well as national permitting process are ongoing for the Project. According to the current schedule, the construction phase is planned to be started in Q4 2019. The Capacity Extension Project is planned to be taken into operation in Q4 2020.

It is anticipated that there will be 100 personnel working on site at the peak period of construction activities, of which 35% is anticipated to be unskilled. Contractors will be contractually required to maximise use of local workforce, especially by utilising the experienced and qualified workforce available in Kiyikoy. There will be no on-site accommodation of the construction workforce.

2.2. Project Location

Kiyikoy WPP Project is located within the administrative borders of Vize district of Kırklareli province. The License Area, specified in the Energy Generation Licenses issued by the EMRA, covers 2,453.3 ha.

The License Area is located approximately 65 km (air distance) southeast of the Kırklareli city centre and 25 km northeast of the Vize district centre. The License Area, turbine locations and the surrounding settlements and roads are shown in Figure 2-1.

The closest settlement to the License Area is Kiyikoy town, which comprises Cumhuriyet, Kale and Guven neighbourhoods. The settlements located in the surroundings of the License Area (within a 10 km radius) and the distance of the settlement centres to the License Area boundary are listed in Table 2-1.

Table 2-1. Settlements Located near the License Area

Settlement	District	Air Distance of the Settlement Centre to the License Area Border (km)	Direction of the Settlement with Respect to the License Area
Kiyikoy town	Vize	2.2	Southeast
Hamidiye town	Vize	3.6	West
Aksicim town	Vize	4.2	Southwest
Kislacik town	Vize	5.2	West-northwest
Balkaya town	Vize	8.1	Southwest

Access to the Project site is provided through the centre of Saray district located in Tekirdag province. From Saray district centre, the Saray-Kiyikoy road is followed for about 25 km, which diverges to the north in the direction of the existing Kiyikoy WPP. From this point, the stabilised forest road is followed for about 12 km to access the site through the existing main access road of the operational Kiyikoy WPP.

The License Area is located at the coast of Black Sea. The elevations (above sea level - asl) within the License Area range between 135 m (north-western part) and 20 m (southern part). The majority of the License Area is situated on state forest land, where there are patches of parcels registered as agricultural, pasture, raw soil.

There are few buildings/structures located within the Project License Area. The closest building/structure to the turbines is located approximately 200 m north of T15, which is situated on a registered agricultural parcel outside the Project's land acquisition area according to the current design.

The License Area falls within the boundaries of Istranca Mountains Key Biodiversity Area (KBA) and located on the "Via Pontica" bird migration corridor along the west coast of the Black Sea. Via Pontica is a major route for raptors in the region. This said, there are no migratory soaring birds that qualify the Istranca Mountains KBA.

2.3. Social Context

The social studies and assessment of potential social impacts of the Kiyikoy WPP Project as part of the ESIA was based on a combination of secondary research (desktop study) and field data. The social study area and the key social elements relevant to the Project are delineated in Figure 2-2.

A comprehensive field study program comprising key informant meetings, interviews with the Project Affect Persons (PAPs) focus group meetings and meetings with the local governmental and non-governmental stakeholders as well as internal stakeholders of the Project has been undertaken within the social study area. The key findings of the social field surveys and the socio-economic assessments conducted for the Project as part of the ESIA are summarised below as they are relevant to the stakeholder engagement process developed for the Project in this SEP:

- The Project-related land acquisition will affect the parcels registered in Kiyikoy town (Population in 2018: 2,180) and Kislacik village (Population in 2018: 650). The mukhtar of Hamidiye stated that the existing and planned turbines are located in the forest land registered in Kiyikoy and Kislacik settlements. This was confirmed by the mukhtars of neighbourhoods.
- Total forest area of Kiyikoy and Kislacik is 12,139 hectares (*Kiyikoy Forestry Sub-district Directorate, 2019*), which consists of mainly oaks. According to the related Forestry Management Plan, the Kiyikoy WPP License Area corresponds to mainly Forest Products Production Function, which serve for forestry product production.
- The forest area that will be impacted by the construction of the units for the new turbines consists of 1% of the total License Area and 0.2% of the total forest area of Kiyikoy and Kislacik settlements. Thus, the Project's impact on forest resources is very limited. The land to be acquired for the Project will not impede or restrict PAPs' access to common resources as the License Area or the Project units except the existing substation site will not be fenced.
- The number of privately-owned parcels to be affected by the Project-related land acquisition is three (3):
 - Parcel no. 129/27 registered in Kiyikoy and located along the main access road of the Project,
 - Parcel no. 129/31 registered in Kiyikoy and located along the main access road of the Project,
 - Parcel no.101/206 registered in Kislacik and located at the footprint of the foundation of T15.
- The legal owner of the house located 200 m north of T15 (on a registered agricultural parcel with the Parcel no. 101/205) resides in Kislacik village. A vulnerable person is currently using this house for accommodation with the permission of the legal owner (without paying rent).
- The primary source of income in Kiyikoy and Kislacik is forestry. Fishery, animal husbandry, tourism and mushroom selling are other sources of income in these settlements.
 - There are three types of income generated from forestry activities:
 - Oak charcoal production, market sale by villagers (allowed by forest management) and planted tree sale (allowed by forest management) are the three types of income generated from forestry activities in Kiyikoy and Kislacik.
 - Livestock breeding and beekeeping are practices in Kiyikoy and Kislacik settlements. The total size of the Kiyikoy pasture area is 429 decares, consisting of 19 parcels (*Vize Regional Directorate of Forestry, 2019*). Among this, only 1 pasture parcel (Parcel no. 319/1) will be affected by the Project (26% of the total parcel area will be affected). There is no pastureland in Kislacik village. There is no grazing prohibition for bovine and ovine animals in the forest areas.

- Mushroom gathering is only practiced in the village of Kislacik and the Boletus type of mushrooms are gathered and sold. It is mainly regarded as women's job.
 - Fishery is among the most important sources of income in Kiyikoy. There is one aquaculture cooperative in Kiyikoy.
 - Tourism is an increasingly developing sector in the Kiyikoy town. There are two beaches (Municipality Beach and Servez Beach) in the region, which are visited by local and foreign tourists frequently.
- The Project is not anticipated to have a negative impact on the livelihoods of the PAPs sourced from forestry activities as the forest area to be acquired by the Project is very limited. The forest area that is outside the area affected by the Project is large enough to sustain ongoing forestry activities such as firewood supply.
 - Beekeeping is carried out both in Kiyikoy and Kislacik. The ESIA studies identified that there are no active beehives and beekeeping activities within Project's License Area. The closest beehives are located outside the License Area, around 1.7 km south of T34, adjacent to an existing forest road in the vicinity of the Turk Stream project site.
 - There is one disabled vulnerable person identified within the License Area. He is living in the house located in the north of T15. The house he is residing in is owned by another PAP, who is living in Kislacik. This vulnerable PAP is on Government aid and also receives disability aid. The legal owner of the building allows the vulnerable PAP to stay without paying any rent as he does not have sufficient income. The house will not be affected directly from the Project-related land acquisition. On the other hand, the construction related effects including dust emissions and noise generation might temporarily affect this receptor during the period of construction activities to be conducted at the location of T15. Upon completion of the construction works at this location, construction related impacts will cease. In the operation period, there is potential for this household for being affected by the noise and shadow flicker impact and risk of blade/ice throw. The Project Company will further engage with the vulnerable PAP living in the setback distance of T15 regarding relocation, inform the PAP on the potential impacts of the Project (e.g. noise, shadow flicker, ice throw) based on the findings of the ESIA and obtain confirmation of his unwillingness or willingness to relocate on condition that the Project Company provides him with a shelter with security of tenure, where he would feel himself comfortable to stay (considering his vulnerability). In case the vulnerable PAP confirms his willingness to relocate, a Resettlement Action Plan (RAP) will be developed and implemented within the timeframes specified in the Project Environmental and Social Action Plan (ESAP) Otherwise, relevant impact mitigation and monitoring measures will be developed and implemented in consultation with the PAP and the legal owner (if required) of the building for the management of noise, shadow flicker impact and blade/ice throw risk with a mutually agreed method that will be approved by Lenders.
 - There are multiple existing and future WPP Projects in the wider region (within 30 km from the boundaries of the License Area).
 - The Turk Stream Project located partly in the southern part of the License Area is a stakeholder of the Project (local business). The Landfall Terminal and the associated facilities of the Turk Stream Project are located between the Kiyikoy WPP and Kiyikoy town centre. As of September 2019, construction works of the Turk Stream Project are ongoing and almost 95% completed.



Figure 2-1. Project Location

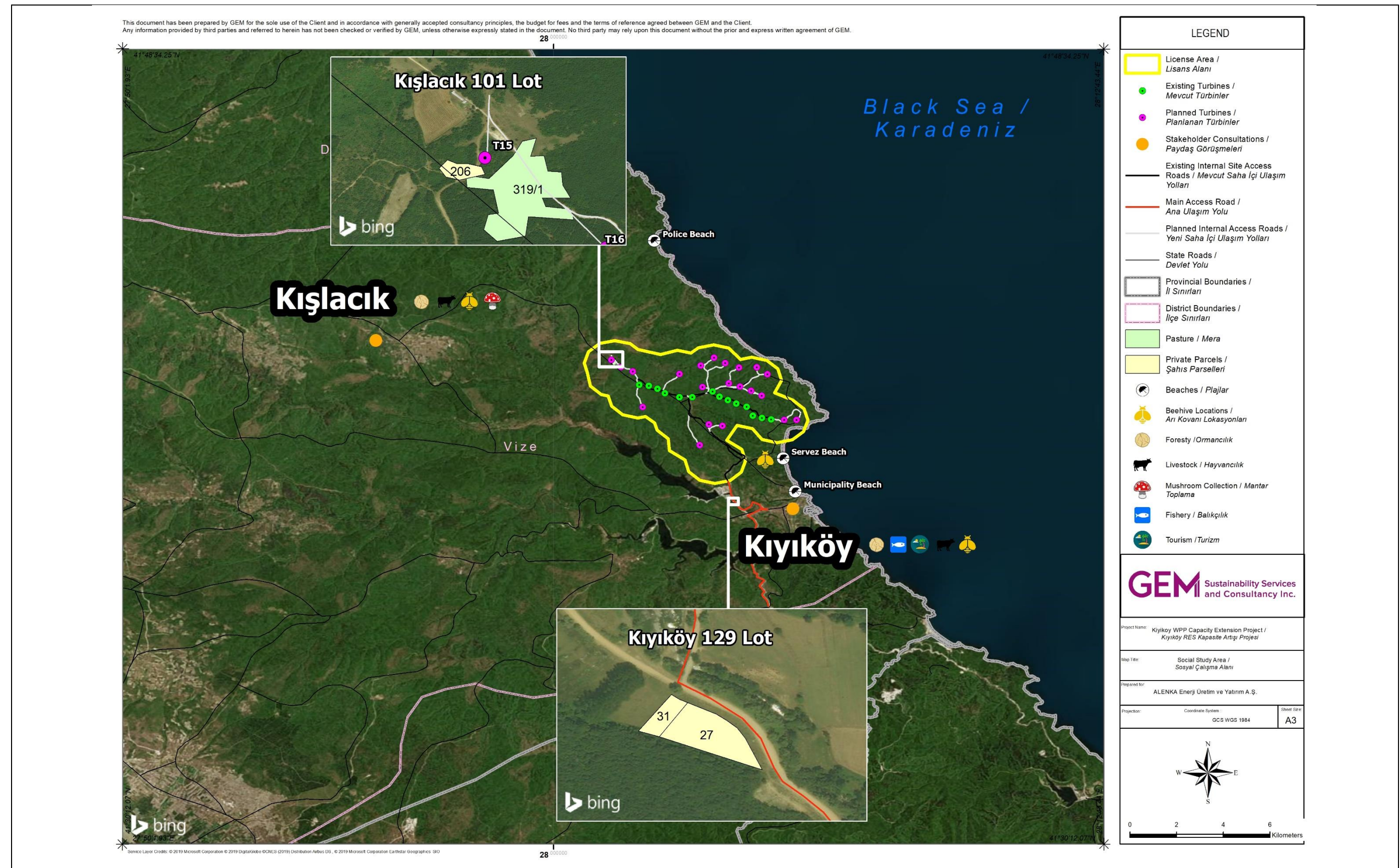


Figure 2-2. Social Study Area

3. NATIONAL LEGISLATION AND INTERNATIONAL STANDARDS APPLICABLE TO STAKEHOLDER ENGAGEMENT

The SEP itself has been prepared in compliance with the following:

- Relevant Turkish legislation
- EBRD's Environmental and Social Policy and the associated PRs, particularly PR10 (2014)

Further details of the relevant Turkish legislation and applicable international requirements are provided in the following sections.

3.1. National Legislation

Under the scope of the current Turkish EIA Regulation (published in the Official Gazette dated 25 November 2014 and Numbered 29186), several references are made to information disclosure and stakeholder participation. Public participation to EIA process is a legal obligation for the project owner as per the 1st clause of Article 9 of the EIA Regulation (see Figure 3-1).

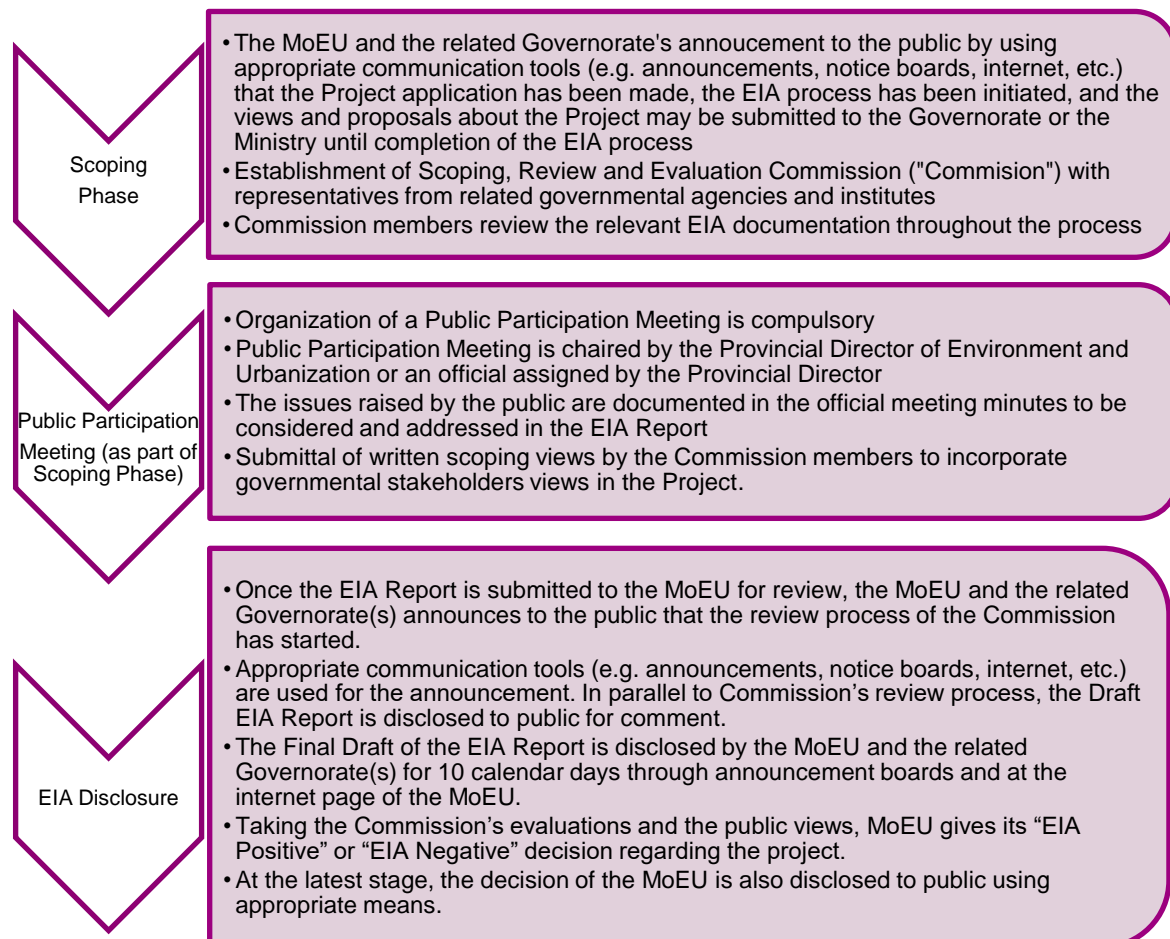


Figure 3-1. Stakeholder Engagement and Disclosure Requirements as per the Turkish EIA Regulation

3.2. EBRD's Policy and PRs (2014) Principles

The main applicable international standard for the Project, EBRD's PRs, agree with the approach of the United Nations Economic Commission for Europe (UNECE) Aarhus Convention, which identifies the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

In addition, EBRD requires that the project it supports conforms to the purpose and goals of the Aarhus Convention. This Convention assures the rights of access to information, public participation in decision-making, and access to justice in environmental matters, therefore protecting people's rights to a healthy environment.

Within this scope, The Project Company will conform to EBRD disclosure and stakeholder engagement requirements as outlined in EBRD's PR 1 and 10:

PR 1: Assessment and Management of Environmental and Social Impacts and Issues

- The Project Company will, as an integral part of the assessment process, identify the Project's stakeholders and design a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project in accordance with PR 10 (below). Dynamic process of performance monitoring and evaluation, including the monitoring of stakeholder feedback, the local community or inspections by regulatory authorities; and
- The Project Company will undertake regular reporting to EBRD on stakeholder engagement during Project implementation.

PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement

- From the earliest stages and through all resettlement activities, the Project Company will involve affected men and women, including host communities. This will facilitate their early and informed participation in decision-making processes related to resettlement, and in PR 10:
- The Project Company has established a grievance mechanism as part of this SEP. It is consistent with PR 5 and with the objectives and principles of PR 10 in order to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities.
- As the land acquisition is the responsibility of the host government, the Project Company will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of PR5. As necessary, the Project Company will play an active role during resettlement planning, implementation and monitoring. The Project Company has prepared a Livelihood Restoration Plan (LRP) that together with the documents prepared by the responsible government agency, aims to meet the requirements of PR5.

PR10: Information Disclosure and Stakeholder Engagement

- The Project Company will conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.
- Stakeholder engagement will involve stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The nature and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment and the level of public interest. The requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under international law, will be met.
- The Project Company will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

3.3. Corporate Policies and Procedures

At the corporate level, BEE has a Social Impact Assessment and Stakeholder Communication Procedure in place. This procedure defines the approach of BEE towards below processes in all corporate investments, including Kiyikoy WPP:

- Social Due Diligence including socio-economic desktop studies and surveys
- Stakeholder Analysis including stakeholder listing and analysis and baseline studies
- Planning including the SEP, Project info kits, social budget determination
- Execution of stakeholder engagement processes, social monitoring and grievance mechanism

For each project that is developed by BEE or taken under the portfolio, if BEE Investment Committee finds it necessary, preparations are made for analysing social dynamics. In this context, socio-economic pre-studies and socio-economic anonymous surveys are conducted.

The list of the stakeholders that can be affected from BEE energy power plants/projects is prepared with input from the Public Relations (PR) Unit or directly prepared by PR Unit.

As per the corporate social policies, a PR strategy is developed for each project following the projects' investment decision and during the planning phase. A Stakeholder Engagement Plan and project information kits are prepared, and social budget is determined. These studies are being updated in the operation period of the plants as well.

SEP is a document which needs to be constantly revised in line with the dynamics of the stakeholders. General update is made by the PR Unit Manager in the last month of each year in the light of projects' requirements.

Stakeholder management is implemented during Project life cycle in line with the Project Annual Communication Plan prepared based on the SEP covering all kinds of press information, stakeholder meetings and activities.

Figure 3-2 provides a summary of the corporate social issues process applicable to all BEE investments including Kiyikoy WPP.

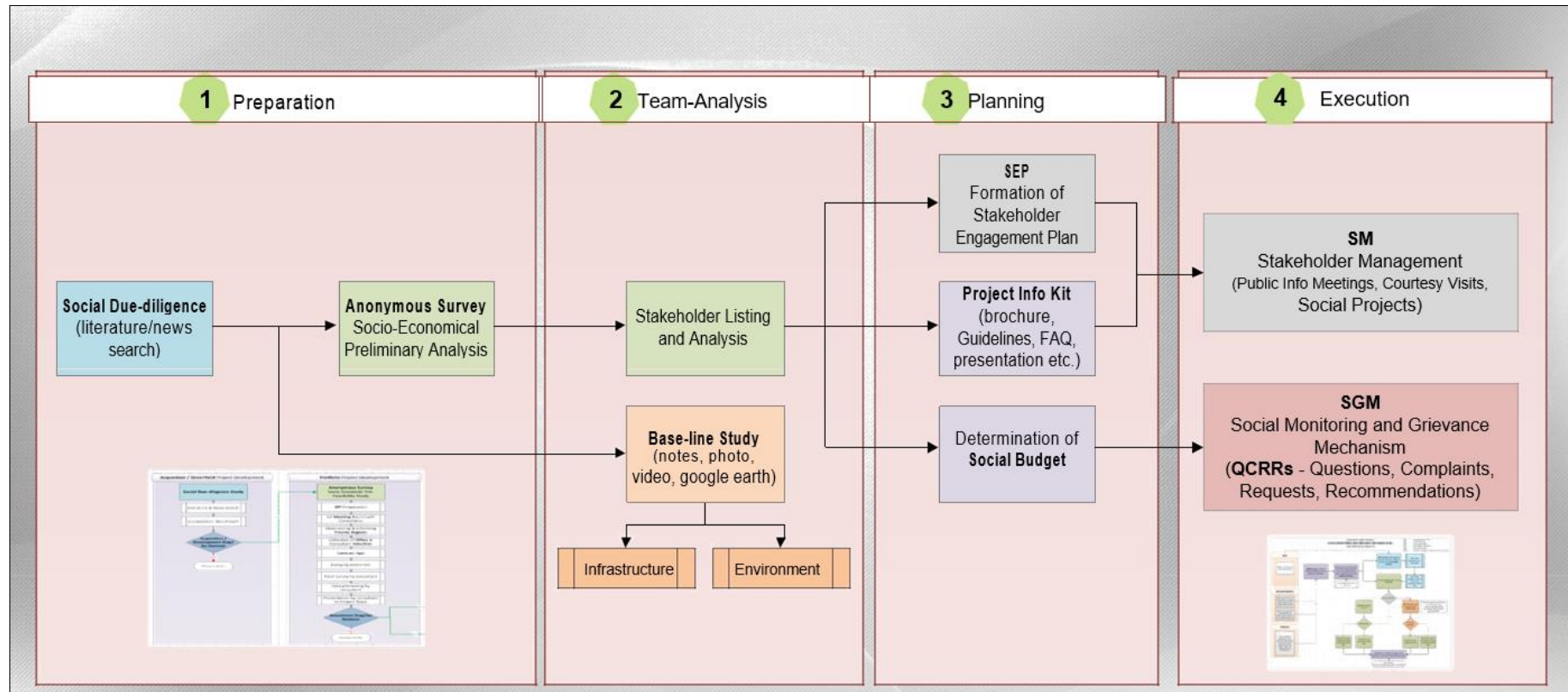


Figure 3-2. Social Issues Process Diagram Applied at Project Level (Applicable to Kiyikoy WPP)

4. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1. Stakeholder Engagement in the Pre-ESIA Process

The Kiyikoy WPP is in operation since August 2014. The Project is well known in the region and engagement with the stakeholders have been conducted conventionally by the operations team until the involvement of the Project Company. The current operations team include 8 personnel from Kiyikoy town, who have acted as a bridge in conveying Project information to the local people residing in Kiyikoy.

The stakeholder engagement activities specific to the Capacity Extension Project have started at the time of the national EIA process. In this context, the formal stakeholder engagement (public participation) meeting, a requirement of the Turkish EIA Regulation, was held on December 4th, 2015 at the Kiyikoy Municipality as part of the scoping stage of the national EIA process. The meeting was announced in the local newspapers per the regulatory requirements. The meeting comprised of presentation of the Project details such as construction and operation activities, recording of comments and suggestions and distribution of handouts with Project information to the attendees.

The EIA Review and Evaluation Commission set up by the MoEU, General Directorate of EIA, Permit and Inspection at the scoping stage of the national EIA processes included the governmental stakeholders listed in Table 4-1.

Table 4-1. Governmental Stakeholders Involved in the Scoping, Review and Evaluation of the national EIA Process

Organisation	Directorate/Administration
Ministry of Culture and Tourism	Edirne Regional Directorate of Cultural Assets Preservation Board
	General Directorate of Investments and Enterprises
Ministry of Energy and Natural Resources	General Directorate of Mining
Ministry of Environment and Urbanization	General Directorate of Spatial Planning
	Kirklareli Provincial Directorate of Forestry and Urbanization
Ministry of Food, Agriculture and Livestock (current Ministry of Agriculture and Forestry)	Kirklareli Provincial Directorate of Food, Agriculture and Livestock
Ministry of Forestry and Water Affairs (current Ministry of Agriculture and Forestry)	General Directorate of Forestry
	General Directorate of Meteorology
	General Directorate of Nature Conservation and National Parks
	General Directorate of State Hydraulic Works Department of Survey, Planning and Consecration
Ministry of Health	Kirklareli Provincial Directorate of Public Health
Ministry of Interior	Kirklareli Provincial Directorate of Disaster and Emergency
Kirklareli Provincial Special Administration	Directorate of Reconstruction and Urban Improvement

The EIA Report for the Capacity Extension Project was prepared taking the comments and opinions of the local communities raised during the Public Participation Meeting and the official views of the governmental stakeholders that formed the EIA Review and Evaluation Commission. Following the finalisation of the report, the EIA was disclosed to public for a period of 10 days at the MoEU and the Provincial Directorate of the Environment and Urbanization as per the requirements of the national EIA Regulation in force. Upon completion of the EIA process, the MoEU granted an “EIA Positive Decision” on 14 September 2017 (Decision No: 4763) to the Kiyikoy WPP Capacity Extension Project.

BEE completed acquisition of the Kiyikoy WPP from its previous owner on 1 December 2017. Prior to acquisition, the senior management of the Company initiated preliminary stakeholder consultations on 30 October 2017 with the meeting held with the President of Kiyikoy Culture and Tourism Association. Following the field consultations, on 1 November 2017, a follow-up meeting was held with the President of Kiyikoy Culture and Tourism Association at the BEE HQs in Istanbul in order to exchange general information on the socio-economic profile of Kiyikoy town, livelihoods of local people and potential cumulative impacts in the region.

As part of the zoning process being conducted as per the relevant national legislation, official views of the related governmental stakeholders were collected in 2017 and 2018 from the governmental authorities listed in Table 4-2.

Table 4-2. Governmental Stakeholders Involved in the Zoning Process

Organisation	2017	2018
Petroleum Pipeline Corporation (BOTAS) Department of Survey and Project	√	
BOTAS General Directorate of Natural Gas Exploitation and Market Operations		√
Electricity Generation Company (EUAS) Department of Environment and Expropriation Directorate of Real Estate and Expropriation	√	√
Thrace Region Gas Distribution Company (GAZDAS)	√	√
General Directorate of Highways	√	√
<i>First Regional Directorate</i>		
General Directorate of State Airports Authority	√	√
<i>Directorate of Construction and Real Estate</i>		
General Directorate of State Railways Turkish State Railways (TCDD) <i>First Regional Directorate of Real Estate Services</i>	√	√
General Directorate of Turkish Electricity Conduction Corporation		√
<i>20th Regional Directorate of Facility and Control</i>		
Kirklareli Provincial Directorate of Culture and Tourism	√	√
Kirklareli Provincial Directorate of Disaster and Emergency	√	√
Kirklareli Provincial Directorate of Financial Office Natural Real Estate		√
Kirklareli Provincial Directorate of Health		√
Kirklareli Provincial Directorate of Public Health	√	
Kirklareli Provincial Directorate of Science, Industry and Technology	√	√
Kirklareli Special Provincial Administration	√	√
<i>Directorate of Zoning and Urban Development</i>		
Ministry of Culture and Tourism	√	
<i>Edirne Regional Directorate of Cultural Assets Preservation Board</i>		
Ministry of Culture and Tourism	√	√
<i>General Directorate of Investments and Enterprises</i>		
Ministry of Energy and Natural Resources	√	
<i>General Directorate of Mineral Research and Exploration</i>		
Ministry of Energy and Natural Resources		√
<i>General Directorate of Mining</i>		
Ministry of Energy and Natural Resources		√
<i>General Directorate of Mineral Research and Exploration Dep. of Geology Survey</i>		
Ministry of Environment and Urbanization		√
<i>General Directorate of Environmental Impact Assessment, Permit and Inspection</i>		
Ministry of Environment and Urbanization	√	√

Organisation	2017	2018
<i>General Directorate of Preservation of Natural Heritage</i>		
Ministry of Environment and Urbanization	√	√
<i>General Directorate of Spatial Planning</i>		
Ministry of Forestry and Water Affairs		√
<i>First Regional Directorate</i>		
Ministry of Forestry and Water Affairs		√
<i>Kirklareli Branch Directorate</i>		
Ministry of Forestry and Water Affairs		√
<i>General Directorate of Forestry Istanbul Forestry District Office Vize Forestry Dep.</i>		
Ministry of Forestry and Water Affairs	√	√
<i>General Directorate of Nature Conservation and National Parks</i>		
Ministry of Forestry and Water Affairs	√	
<i>General Directorate of State Hydraulic Works 11th Regional Directorate</i>		
Ministry of Transport, Maritime Affairs and Communications	√	
<i>General Directorate of Civil Aviation</i>		
Ministry of Transport, Maritime Affairs and Communications		√
<i>General Directorate of Infrastructure Investments</i>		
General Directorate of Turkish Electricity Distribution Company (TEDAS)	√	√
<i>Department of Investments Monitoring Directorate of Renewable Energy Projects</i>		
Thrace Electricity Distribution Company	√	
<i>Directorship of Investments Directorate of Real Estate and Expropriation</i>		
Thrace Regional (Trakya) Electricity Distribution Company (TREDAS)		√
<i>Kirklareli Provincial District Engineering</i>		
TREDAS Directorate of Administration Management Engineering	√	
Telecommunication Company	√	√
<i>Turk Telekom</i>		

The Project team continued engagement with the stakeholders through field interviews conducted on 3 January 2019. Two stakeholder interviews (one resident of Kislacik and one resident of Kiyikoy) were conducted in Kislacik and Kiyikoy. General information regarding the socio-economic conditions of the settlements and level of knowledge of local people on the Project and their Project-related concerns, comments, and expectations were discussed in the interviews. One employee interview was also conducted as an internal stakeholder engagement and information on the past and existing working conditions was obtained.

4.2. Stakeholder Engagement as part of the ESIA Process

Stakeholder engagement activities as part of the ESIA process were conducted through three separate field visits held by the senior social specialists of SRM ("social team") as summarised in Table 4-3. A scoping (reconnaissance) site visit was conducted by the social team on 18 April 2019 with the participation of the representatives from the Project Company and the ESIA team. Based on the outcomes of the preliminary desk-based research and the scoping site visit, the social study area for the Project was identified and further desk-based research was conducted to design the field study program. As summarised below, the field study program involved key informant meetings, interviews with the PAPs, focus group meetings and meetings with the local governmental and non-governmental stakeholders as well as internal stakeholders of the Project.

Table 4-3. Summary of the Stakeholder Engagement Activities Conducted as part of the ESIA

Tasks	Date of the Field Study	Scope of the Field Study
Scoping study	18 April 2019	<ul style="list-style-type: none"> -Meeting with the existing site operations team and obtaining information on the Project background and current operations including social activities -Visiting the License Area, turbine locations, parcels to be affected by Project-related land acquisition, nearby structures and the main access road route
Key stakeholder meetings	2-3 May 2019	<ul style="list-style-type: none"> -Meetings with the public stakeholders at provincial level, district level and neighbourhood level -Preliminary face to face meetings with the mukhtars of five (5) settlement (three neighbourhoods in Kiyikoy town, and Kislacik and Hamidiye villages)
In-depth interviews and focus group meetings	6-9 May 2019	<ul style="list-style-type: none"> -In-depth interviews with the mukhtars (mukhtar surveys) of five (5) settlements (three neighbourhoods in Kiyikoy town, and Kislacik and Hamidiye villages) -Four (4) focus group discussions (including women meetings) -Four (4) in-depth interviews (including resident and owner of the building near T15) -Interviews with Vize Municipality, Vize District Directorate of Agriculture, Forest Sub-District Directorate of Kiyikoy, Provincial Directorate for Agriculture-Pasture Division; - -Interviews with other local business (representatives of the Turk Stream Project located partially within the southern part of the License Area) -Nine (9) NGOs

In parallel to the ESIA studies, the Company has started negotiations with the shareholders of the privately-owned parcels to be acquired for the Project in Kiyikoy and Kislacik. Three meetings were held with the available households affected from Project-related land acquisition in Kiyikoy and Kislacik on 9 July, 25 July and 26 September 2019. Besides, the Project Company has been engaging with the vulnerable PAP living 200 m north of T15 (within the setback distance of T15). The last meeting with the vulnerable PAP was held on 26 September 2019. Through these meetings, the PAP has been provided general information about the Project.

Field methodology followed an inclusive and participatory approach. The social team on the field comprised of male and female social experts. The number of the meetings and stakeholder consulted as part of the field surveys is summarised in Table 4-4.

Table 4-4. Field Study Summary (see Table 4-5 for the detailed specific stakeholders consulted)

No	Consulted Stakeholders	Number of Institutions / Meetings	Number of Consulted Stakeholders
A. Consultations with Governmental Organisations (Total)		12	14
1	Kirklareli Governorate	1	1
2	Provincial Directorate of Environmental and Urbanization	1	1
3	Provincial Directorate of Agriculture	2	3
4	Vize Directorate of Forestry	2	4
5	Kiyikoy Sub-district Directorate of Forestry	1	1
6	Vize District Directorate of Agriculture	2	1
7	Vize Sub-governorate	1	1
8	Vize Municipality	1	1
9	Public Education Center	1	1
B. Consultations with Non-governmental Organisations (NGOs)		9	11
C. Socio-economic Field Research (Total)		20	36
1	Preliminary Face to Face Meetings with the Mukhtars	5	5
2	In-depth Interviews with the Mukhtars	5	5
3	In-depth interviews with the Community	4	4
4	Focus group discussions	4	19
5	Household surveys	1	1
6	Other Local Business	1	2
Total		41	61

Source: SRM Field Study, May 2019.

The list of the stakeholders consulted is provided in Table 4-5.

Table 4-5. List of the Stakeholders Consulted

Stakeholder	Position	Stakeholder Type	Location	Date	Method
A. Consultations with Governmental Organisations					
1 Governorate	Deputy Governor	Public Inst.	Kırklareli province	2.5.2019	Face to face meeting
2 Provincial Directorate of Agriculture, Pasture Department	Agricultural Engineer	Public Inst.	Kırklareli province	2.5.2019	Face to face meeting
3 Provincial Directorate of Environment and Urban Planning, Brach of EIA and Env. Permissions	Unit Head	Public Inst.	Kırklareli province	2.5.2019	Face to face meeting
4 Vize Directorate of Forestry	Manager, Assistant Manager and Chief of Kiyikoy Forestry Man.	Public Inst.	Vize district	2.5.2019	Face to face meeting
5 Vize District Directorate of Agriculture	Manager	Public Inst.	Vize district	3.5.2019	Face to face meeting
6 Vize Sub-governorate	District Governor	Public Inst.	Vize district	3.5.2019	Face to face meeting
7 Public Education Center	Manager	Public Inst.	Vize district	6.5.2019	Face to face meeting
8 Forest Sub-district Directorate of Kiyikoy	Officer	Public Inst.	Kiyikoy town	7.5.2019	Face to face meeting
9 Vize District Directorate of Agriculture	Manager	Public Inst.	Vize district	8.5.2019	Face to face meeting
10 Vize Municipality	Mayor	Municipality	Vize district	8.5.2019	Face to face meeting
11 Vize Directorate of Forestry	Chief	Public Inst.	Vize district	8.5.2019	Face to face meeting
12 Provincial Directorate of Agriculture Pasture	Agricultural Engineers	Public Inst.	Kırklareli province	9.5.2019	Face to face meeting
B. Consultations with Non-governmental Organisations (NGOs)					
1 Association for the Preservation of Farmers' Assets	Head	NGO	Vize district	6.5.2019	Face to face meeting
2 Association of Cattle Breeders	Technician	NGO	Vize district	6.5.2019	Face to face meeting
3 Association of Honey Producers	Head	NGO	Vize district	6.5.2019	Face to face meeting
4 Association of Hunters	Head	NGO	Vize district	6.5.2019	Face to face meeting
5 Union of Chamber of Tradesmen and Artisans	Head	NGO	Vize district	6.5.2019	Face to face meeting
6 Development Cooperative of Kiyikoy	Vice-president	NGO	Kiyikoy town	7.5.2019	Face to face meeting
7 City Council of Kırklareli (<i>Kent Konseyi</i>)	Head of Env. Assembly and Mem. of the Thracian Platform; Member of the BoD of Env. Assembly	NGO	Kırklareli province	8.5.2019	Face to face meeting
8 Thracian Platform	Head of Uzunkopru City Council Environment Assembly; Head of Edirne Medical Chamber	NGO	Edirne	8.5.2019	Face to face meeting
9 Chamber of Agriculture	Secretary General	NGO	Vize district	9.5.2019	Face to face meeting

Stakeholder		Position	Stakeholder Type	Location	Date	Method
C. Socio-economic Field Research						
Mukhtar Meetings and Questionnaires						
1	Cumhuriyet Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	3.5.2019	Face to face meeting
2	Cumhuriyet Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	7.5.2019	Mukhtar Questionnaire
3	Guyen Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	3.5.2019	Face to face meeting
4	Guyen Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	7.5.2019	Mukhtar Questionnaire
5	Hamidiye Village	Mukhtar	Mukhtar	Kiyikoy town	3.5.2019	Face to face meeting
6	Hamidiye Neighbourhood	Mukhtar	Mukhtar	Hamidiye village	9.5.2019	Mukhtar Questionnaire
7	Kale Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	3.5.2019	Face to face meeting
8	Kale Neighbourhood	Mukhtar	Mukhtar	Kiyikoy town	7.5.2019	Mukhtar Questionnaire
9	Kislacik Village	Mukhtar	Mukhtar	Kislacik town	3.5.2019	Face to face meeting
10	Kislacik Village	Mukhtar	Mukhtar	Kislacik village	6.5.2019	Mukhtar Questionnaire
In-depth Interviews with the Community						
1	The person who resides at the building located in the north of T15	Vulnerable Group/Person (PAP)	Community	Kislacik village	3.5.2019	In-depth Interview
2	Owner of the house resided by the vulnerable person in the north of T15	Kislacik Village Resident	Community	Kislacik village	7.5.2019	In-depth Interview
3	Buffalo breeder (1 person)	Kislacik Village Resident	Community	Kislacik village	7.5.2019	In-depth Interview
4	Bovine and ovine owner (1 person)	Kiyikoy Neighbourhood Resident	Community	Kiyikoy town	7.5.2019	In-depth Interview
Focus Group Meetings						
1	Kislacik Village (Men)	Members of the Cooperative, stock breeders and beekeepers residing in the village (5 people)	Community	Kislacik village	6.5.2019	Focus Group
2	Kislacik Village (Women)	Kislacik residents (5 women)	Community	Kislacik village	7.5.2019	Focus Group
3	Kiyikoy Beekeepers (Stationary)	Kiyikoy residents (5 beekeepers)	Community	Kiyikoy town	7.5.2019	Focus Group
4	Kiyikoy WPP Employees	Kiyikoy WPP Employees (4 people)	Community	Kiyikoy town	9.5.2019	Focus Group
Household Questionnaires						
1	User of the Parcel No. 129-31 which is affected from the Project-related Land Acquisition (parcel is located on the route of WPP main access road	Successor and user (Son of one of the five share holders of parcel to be acquired)	Community	Kiyikoy town	7.5.2019	Household Questionnaire
Other Local Business						
1	Turk Stream Project	Social Expert: Consultant	Private Sector	Kiyikoy town	7.5.2019	Face to face

Source: SRM Field Study, May 2019.

5. STAKEHOLDER IDENTIFICATION

In line with the definitions of international standards, this SEP recognises a stakeholder as any individual, organization or group that is potentially affected by the Project or that has an interest in the Project and its impacts.

The purpose of stakeholder identification is to determine and prioritise Project stakeholders for consultation that may be affected (either directly or indirectly in positive or negative way) by the Project or that have an interest in the Project but are not necessarily directly impacted by it. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.

The stakeholders that have been identified as being affected by or potentially interested in the Project are listed in Table 5-1, whereas a detailed list including contact details of the key stakeholders is given in Appendix A. Organisations or groups which are not listed and wish to be informed about the Project, are invited to contact Project Company (see Chapter 10 for contact details for the stakeholders) to add their contact information to the list. The list of stakeholders will be updated and revised as part of the SEP update.

Table 5-1. Project Stakeholder Groups

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
External Stakeholders		
National Governmental Organizations	<p>Primary:</p> <ul style="list-style-type: none"> - Energy Market Regulatory Authority - Ministry of Agriculture and Forestry - Ministry of Energy and Natural Resources - Ministry of Environment and Urbanization <p>Secondary:</p> <ul style="list-style-type: none"> - Ministry of Culture and Tourism - Ministry of Labour and Social Security - Ministry of Transport and Infrastructure - Ministry of National Education 	<ul style="list-style-type: none"> -National and regional planning and development -Policy formulation -Permitting -Cumulative impacts
Local Governmental Organizations	<p>Primary:</p> <ul style="list-style-type: none"> - Governorship of Kırklareli - Provincial Directorate of Environment and Urbanization - Provincial Directorate of Agriculture and Forestry - Kızılköy Municipality - Kızılköy Forestry Sub-District Directorate - Vize District Governorate - Vize District Directorate of Agriculture - Vize Directorate of Forestry <p>Secondary:</p> <ul style="list-style-type: none"> - Vize Gendarmerie - Local Police Force - Local Emergency and Health Services - Provincial Directorate of Health - Provincial Directorate of Culture and Tourism - Vize Municipality 	<ul style="list-style-type: none"> -Community development -Management of environmental impacts (e.g. wastes, wastewater) -Permitting
Public Economic Enterprises	<ul style="list-style-type: none"> - Turkish Electricity Transmission Company (TEİAŞ) 	<ul style="list-style-type: none"> -Implementation of infrastructure services -Operation and maintenance of Project ETLs

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
Mukhtars/Local Communities/ Residents (incl. landowners and/or users)	<ul style="list-style-type: none"> - Vize district - Kiyikoy town - Cumhuriyet neighbourhood - Guven neighbourhood - Kale neighbourhood - Kislacik village - Users of the forests located within the License Area of the Project 	<ul style="list-style-type: none"> -Environmental and social impacts -Cumulative impacts -Land acquisition -Employment -Community development
Vulnerable persons/groups	<p>The poor/elderly/people with disabilities, women headed households in;</p> <ul style="list-style-type: none"> - Cumhuriyet neighbourhood - Güven neighbourhood - Kale neighbourhood - Kışlacık village - Vulnerable person living in the house located in the north of T15 	<ul style="list-style-type: none"> -Environmental and social impacts -Cumulative impacts
Women PAPs	<p>Women mushroom collectors, etc. in</p> <ul style="list-style-type: none"> - Kışlacık village (mushroom collectors) - Cumhuriyet neighbourhood - Güven neighbourhood - Kale neighbourhood 	<ul style="list-style-type: none"> -Environmental and social impacts -Cumulative impacts -Land acquisition -Employment
Local Businesses	<ul style="list-style-type: none"> - Local Enterprises 	<ul style="list-style-type: none"> -Procurement and service provision opportunities -Inward investment
Non-governmental Organizations (NGO's) – international, national and local	<p>Primary:</p> <ul style="list-style-type: none"> - Development Cooperative of Kiyikoy - Development Cooperative of Kislacık - Kiyikoy Culture and Tourism Association - Kırklareli City Council – Environmental Assembly - Vize Association of Mukhtars - Vize Union of Chamber of Merchants and Craftsmen - TEMA Vize Branch - The Thracian Platform - Vize Beekeepers Association - Vize Cattle Breeders Association <p>Secondary:</p> <ul style="list-style-type: none"> - Environment Foundation of Turkey - National - Nature Association (Doğa Derneği) - National - World Wildlife Fund (WWF) Turkey – National - TEMA Kırklareli Branch - Kırklareli Beekeepers Association - Kırklareli Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB) - Kırklareli Branch Office of Chamber of Electrical Engineers - Kırklareli Branch Office of Chamber of Environmental Engineers 	<ul style="list-style-type: none"> -Environmental and social impacts -Sustainable development -Cumulative impacts

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
	<ul style="list-style-type: none"> - Kırklareli Bar Association (including Environmental Commission) - Kiyiköy Fisheries Cooperative - The Northern Forests Defense (Kuzey Ormanları Savunması) - Vize Chamber of Agriculture - Vize Association for the Preservation of Farmers' Assets - Vize Hunters Association - Women associations 	
Academic/Educational Institutions	<ul style="list-style-type: none"> - Kırklareli University - Vize Vocational School - Vize Public Education Centre - Other universities (as necessary) 	<ul style="list-style-type: none"> -Technical Consultancy -Corporate Social Responsibility activities
Local Media	<ul style="list-style-type: none"> - Local newspapers, local television channels, etc. (e.g. Vize Haber newspaper) 	<ul style="list-style-type: none"> -Relaying correct, transparent and timely Project information to communities -Advertisements
Other Projects (wind power and other sectors)	<ul style="list-style-type: none"> - TurkStream Project - Other WPPs in the wider area 	<ul style="list-style-type: none"> -Cumulative environmental and social impacts -Community Development
Lenders	<ul style="list-style-type: none"> - International finance institutions (including private banks) 	<ul style="list-style-type: none"> -Project finance -Environmental and social risks -Project's environmental and social performance
Internal Stakeholders		
Company	<ul style="list-style-type: none"> - Employees - Contractors and Sub-contractors and their Employees 	<ul style="list-style-type: none"> -Growth and development -Environmental and social management -Stable employment and opportunity -Occupational health and safety
Company Shareholders	<ul style="list-style-type: none"> - All shareholders 	<ul style="list-style-type: none"> -Reputation with regard to environmental and social performance of the Project -Business growth and shareholder value

6. ROLES AND RESPONSIBILITIES

The ESMS Team of the Project will be responsible from implementation of this SEP and the Project grievance mechanism. The planned organisational structure of the ESMS Team, including the Senior Management and the Project level ESMS roles of the Company and the contractors, is presented for the construction and operation phases in Figure 6-1. The roles and responsibilities of the ESMS Team in terms of implementation of this SEP as well as the Project grievance mechanisms are provided in Table 6-1

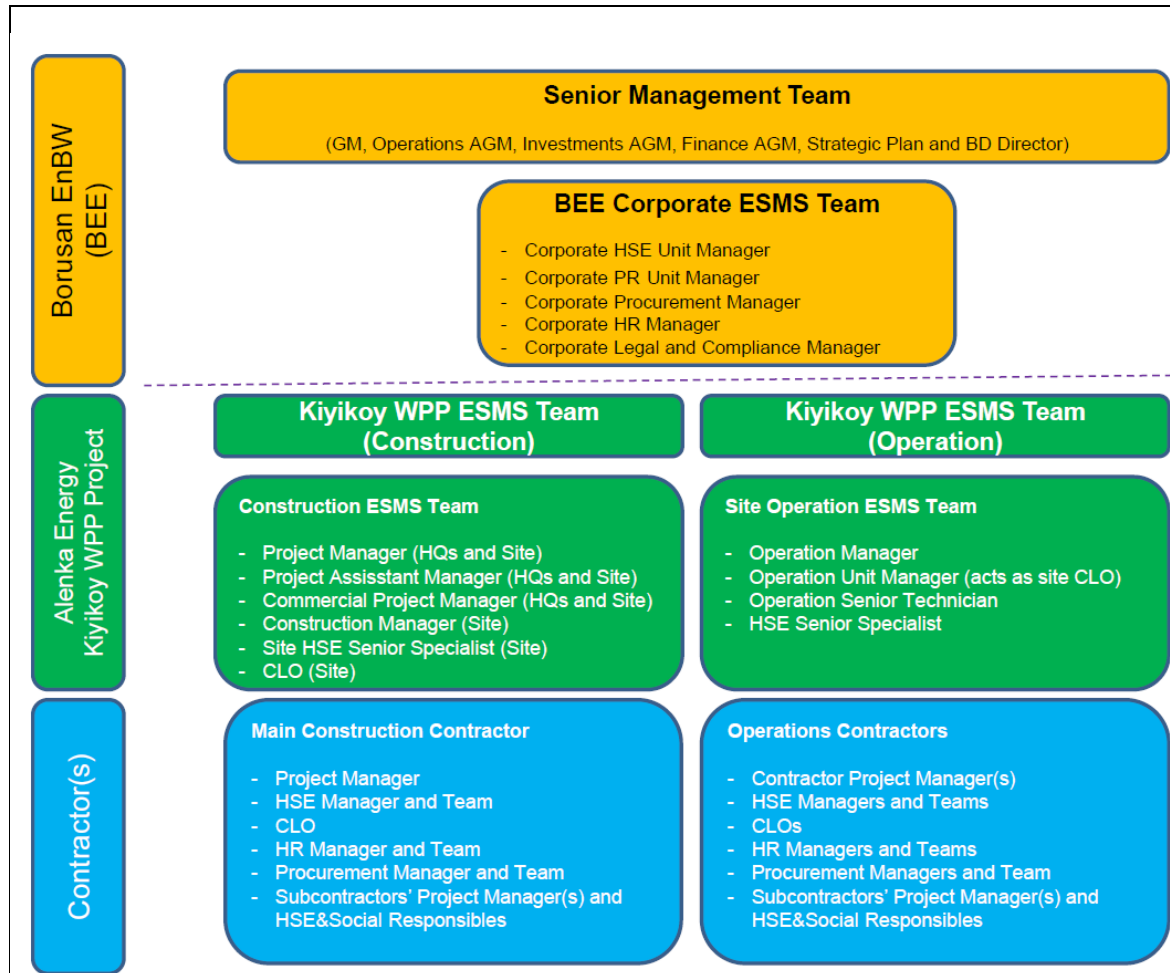


Figure 6-1. Kiyikoy WPP Project ESMS Team

At the corporate level, BEE has a Social Monitoring Committee composed of following BEE personnel;

- BEE Investments Assistant General Manager
- BEE Operations Assistant General Manager
- Relevant Project Manager/Operation Manager
- BEE PR Unit Manager
- BEE Management Systems Manager (in case of grievances/comments related to the environmental concerns dictated by ISO 14001)

Table 6-1. Roles and Responsibilities of the Project ESMS Team related to SEP and Grievance Mechanism Implementation

ESMS Team Member	Roles and Responsibilities
Corporate Roles for Construction and Operation	
Corporate PR Unit Manager	<ul style="list-style-type: none"> Oversee compliance of Project implementations with the EBRD PR1, PR5 and PR10 requirements concerning stakeholder engagement and grievance as well as Approve SEP updates and training documents on the implementation of the SEP and grievance mechanism Ensure effective and periodic communication with the external stakeholders. Ensure community grievances are collected, registered and responded by the Project Company as well as contractors and subcontractors as per the Project SEP. Keep the database of public grievances. In coordination with the contractors and subcontractors as required, develop and implement additional measures for resolving community related issues, including measures aimed at resolving non-closed grievances. Review budgetary limits and develop Project-specific strategies in coordination with the Project Manager/Operation Manager. Ensure coordination and consistency across all stakeholder facing activities by all parties.
Corporate HSE Unit Manager	<ul style="list-style-type: none"> Evaluate the capacity of the site HSE teams for SEP and grievance mechanism implementation Report to the Senior Management Team on Project's E&S Performance including implementation of SEP and management of grievances Review the database of internal grievances shared by the Corporate HR Unit for E&S reporting purposes. Review Project-related grievances and ensure/verify that the site teams address the grievances/corrective actions in responsive timeframes.
Corporate Procurement Manager	<ul style="list-style-type: none"> Ensure engagement with stakeholders in line with Project SEP regarding Project's procurement requirements
Corporate HR Manager	<ul style="list-style-type: none"> Ensure engagement with internal stakeholders adhere to Project SEP. Ensure that all Project employees, including direct and contracted employees, are informed and provided with guidance about the use of Project grievance mechanism at the time of hiring. Ensure contractors implement the Project grievance mechanisms, through review of grievance records reports. Keep the database of internal grievances, which will be accessible to Corporate HSE Unit. Compile the grievances/comments to be presented to the SMC monthly meetings.
SMC Committee	<ul style="list-style-type: none"> Meets on ad hoc basis based on the need. Evaluate all submitted grievances/comments in terms of cost/benefit, monetary requirement, doability, and strategy. Report the results of the meeting to General Manager.
Construction Phase	
Project Manager/ Project Assistant Manager/ Commercial Project Manager	<ul style="list-style-type: none"> Ensure adequate resources are allocated for the implementation of the SEP and Project grievance mechanism during the construction phase. Full ownership of the implementation of SEP and Project grievance mechanism. Ensure contractors and subcontractors are fully aligned with the SEP and implement the internal grievance mechanisms through contractual requirements as relevant. Ensure maximisation of the local employment and procurement to the extent possible.

ESMS Team Member	Roles and Responsibilities
	<ul style="list-style-type: none"> Periodic reporting to the Company Senior Management on SEP implementation. Sending the grievance/requests (to the PR Unit Manager) that are to be submitted to the SMC in 3 working days before the SMC meeting.
Construction Site Manager	<ul style="list-style-type: none"> Coordinate and oversee the implementation of SEP by the contractor and subcontractor teams. Report to the Project Management regarding the grievances received from the communities and their management in line with SEP. Support Site HSE Senior Specialist and the Site CLO in the management of internal and external grievances by planning and implementing technical and administrative measures as required.
Site HSE Senior Specialist	<ul style="list-style-type: none"> Ensure SEP implementation and management of grievances in line with EBRD PR1, PR5 and PR10. Conduct internal HSE reporting including SEP and Project grievance mechanism implementation, for the Corporate ESMS managers and the Senior Management Team. Ensure trainings on SEP and Project grievance mechanism are conducted by the contractors and the Project Company, through review of training records and related training documents. Oversee contractors' compliance with SEP. Ensure internal grievances are registered and responded as per the Project SEP.
CLO (Site)	<ul style="list-style-type: none"> Act as the Project Social Officer as per corporate procedures Ensure effective and periodic communication with the external stakeholders during the construction phase. In coordination with the HR team and Site HSE Senior Specialist, ensure all Project personnel (direct and contracted) receives trainings on the implementation of the internal and external grievance mechanism developed for the Project (e.g. how to submit internal grievances, how to manage external grievances, etc.) at the time of employment. Ensure community grievances are registered and responded as per the Project SEP. Support HSE Senior Specialist in the management of internal grievances as required.
Main Construction Contractor and Sub-contractors (Project Managers and ESMS Teams including HSE/HR/Procurement Managers and Teams)	<ul style="list-style-type: none"> Ensure compliance with the Project SEP through contractual requirements. Ensure competent and trained HSE staff is allocated to implement SEP and Project grievance mechanism. Ensure adequate resources are allocated for the implementation of the SEP and grievance mechanism. Ensure grievances are recorded and responded to appropriately and shared with the Project Company CLO Prepare periodic HSE reports (Main Contractor to submit to the Project Company) including SEP implementation and management of grievances.
Operation Phase	
Operation Manager	<ul style="list-style-type: none"> Ensure adequate resources are allocated for the implementation of the SEP and Project grievance mechanism during the operation phase. Full ownership of the implementation of SEP and Project grievance mechanism. Periodic reporting to the Company Senior Management on SEP implementation. Sending the grievance/requests (to the PR Unit Manager) that are to be submitted to the SMC in 3 working days before the SMC meeting.
Operation Unit Manager	<ul style="list-style-type: none"> Act as the CLO (Project Social Officer as per corporate procedures) during the operation phase and ensure effective and periodic communication with the external stakeholders.

ESMS Team Member	Roles and Responsibilities
	<ul style="list-style-type: none"> • Coordinate and oversee the implementation of SEP by the operation team. • Report to the Project Management regarding the grievances received from the communities and their management in line with SEP. • Support Site HSE Senior Specialist and the Site CLO in the management of internal and external grievances by planning and implementing operational and administrative measures as required. • Ensure community grievances are registered and responded as per the Project SEP during the operation phase. • Support HSE Senior Specialist in the management of internal grievances of the operation workforce as required.
HSE Senior Specialist	<ul style="list-style-type: none"> • Ensure SEP implementation and management of grievances in line with EBRD PR1, PR5 and PR10. • Implement, review, update and monitor the SEP. • Conduct internal HSE reporting including SEP and Project grievance mechanism implementation, for the Corporate ESMS managers and the Senior Management Team. • Ensure trainings on SEP and Project grievance mechanism are conducted. • Identify the training requirements of the operation workforce together with the HR Manager and ensure implementation of the training program as identified. • Ensure internal grievances are registered, transmitted to the Corporate HSE and HR units and responded as per the Project SEP.
Main Operations Contractor and Sub-contractors (Project Managers and ESMS Teams including HSE/HR/Procurement Managers and Teams)	<ul style="list-style-type: none"> • Ensure compliance with the Project SEP through contractual requirements. • Ensure competent and trained HSE staff is allocated to implement SEP and Project grievance mechanism. • Ensure adequate resources are allocated for the implementation of the SEP and grievance mechanism. • Ensure grievances are recorded and responded to appropriately and shared with the Project Company CLO • Prepare periodic HSE reports (Main Contractor to submit to the Project Company) including SEP implementation and management of grievances.

7. STAKEHOLDER ENGAGEMENT PLAN

In this section of the SEP, the Project Company's plan for stakeholder engagement is introduced, and disclosure process and timetable are presented in detail. Following this, the stakeholder engagement methods and frequencies of Kiyikoy WPP are presented and finally stakeholder engagement action plan for construction and operation phases is given.

A sample stakeholder engagement log is provided in Appendix B.

7.1. External Stakeholders

To ensure effective and meaningful engagement with different stakeholder groups, the Project Company will use various appropriate methods of communication and information throughout construction and operation phases of the Project.

Above all, electronic copies of the Disclosure Package documents (in Turkish and English) and the national EIA will be disclosed to public on the Borusan EnBW website, as well as the EBRD website (<http://www.ebrd.com>) for the 60 day disclosure period) to allow stakeholders to view information about the planned development and to initiate their involvement in the public consultation process. It is envisaged that electronic copies of the Disclosure Package documents, including this SEP, will remain in the public domain for the duration of the Project and that this SEP will be updated periodically (at least annually) and will remain publicly available on the web-site.

In addition to electronic copies, hard copies of the documents comprising the Disclosure Package and the national EIA will also be available at the following locations:

- BEE HQs in Istanbul
- BEE office in Ankara
- The administrative building located at the existing Kiyikoy WPP substation site
- The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kisilacik village)

Periodical reports on the Project's environmental and social performance will be prepared and submitted to the Lenders (i.e. EBRD) based on periodical monitoring. Particularly during consultation with stakeholders and for information dissemination to the local communities, mukhtars will play an important role by maintaining communication between communities and external stakeholders from outside their localities. Periodical meetings will be conducted with the mukhtars and community representatives to inform them about the Project progress.

The contact details of the Company are provided in Section 10 of this SEP.

7.1.1. ESIA Disclosure

The Kiyikoy WPP Capacity Extension Project has been assigned by EBRD as a Category A development. As per the E&S Policy and related Performance Requirements (2014) of the EBRD, the following documents have been prepared by GEM as part of the Project ESIA Disclosure Package:

- ESIA Report
- Environmental and Social Management and Monitoring Plan (ESMMP)
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)
- Livelihood Restoration Plan (LRP)

The ESIA Disclosure Package will be disclosed at BEE and EBRD websites for 60 days in order to provide the stakeholders with detailed information on the Project activities, impact assessment and planned mitigation measures as well as the monitoring activities and collect public comments on the Project and disclosure documents.

Hard copies of the ESIA Disclosure Package will also be made available at the following locations:

- BEE HQs in Istanbul
- BEE office in Ankara
- The administrative building located at the existing Kiyikoy WPP substation site
- The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kislacik village)

An ESAP will also be disclosed as part of the the ESIA disclosure package.

The PR Unit representative of BEE will be responsible for ensuring that the comments, questions and suggestions are duly addressed in line with the Project SEP.

Table 7-1. Stakeholder Engagement Plan for the ESIA Disclosure Period (Prior to Start of Construction)

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
All relevant stakeholder groups including village/neighbourhood headmen, local communities, governmental and non-governmental agencies, media, internal stakeholders, media, universities, lenders, local businesses, etc.	<ul style="list-style-type: none"> To provide information on the Project, ESIA study, impacts assessment findings and the Project-specific E&S management system including the management and action plans (SEP, LRP, BAP, etc.) 	<ul style="list-style-type: none"> ESIA Disclosure Package (disclosed during the ESIA disclosure phase) <ul style="list-style-type: none"> ESIA Report ESMMP NTS SEP LRP 	<ul style="list-style-type: none"> Publishing digital copies of the ESIA documentation 	<ul style="list-style-type: none"> Project Company website (Lenders may also publish on their websites) 	<ul style="list-style-type: none"> Senior Management Team BEE PR Unit Manager BEE HSE Unit Manager 	Q4 2019
Related central and local governmental agencies	<ul style="list-style-type: none"> To provide information on the Project and ESIA study findings in a timely, transparent and efficient manner To collect comments, questions and suggestions of the stakeholders for consideration in the ESIA documentation and during Project implementation To invite the stakeholders to the disclosure meetings 	ESIA Disclosure Package <ul style="list-style-type: none"> ESIA Report ESMMP NTS SEP LRP 	<ul style="list-style-type: none"> Publishing digital copies of the ESIA documentation Face to face meetings 	<ul style="list-style-type: none"> Project Company website (Lenders may also publish on their websites) Ankara Istanbul Kirklareli (Vize district and local settlements) Project site Other locations as necessary 	<ul style="list-style-type: none"> BEE PR Unit Manager BEE Senior Management (as required) BEE PR Unit Manager BEE Legal and Compliance Manager BEE HSE Unit Manager BEE Administrative Affairs Manager Project Manager Assistant Project Manager 	Q4 2019
Headmen (mukhtars) of the local communities: <ul style="list-style-type: none"> Kiyikoy town (Cumhuriyet, Güven, Kale neighbourhoods) Kislacik village 	<ul style="list-style-type: none"> To provide/exchange up-to-date information on the Project status, current activities, potential E&S impacts of the current activities (according to Project phase), Project E&S Management System, community health and safety management, emergency preparedness and response, community development projects, planned stakeholder engagement events, employment and procurement opportunities, etc. in a timely, transparent, understandable, and efficient manner 	<ul style="list-style-type: none"> Information packages including brochures, booklets, posters, flyers, maps summarising the key up-to-date Project information in a non-technical and comprehensible language/format 	<ul style="list-style-type: none"> Regular or on-demand face to face meetings with Mukhtars at their offices or public places, as appropriate 	<ul style="list-style-type: none"> The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Güven and Kale neighbourhoods of Kiyikoy town and Kislacik village) 	<ul style="list-style-type: none"> BEE PR Unit Manager Project Manager Assistant Project Manager Site Manager CLO 	Q4 2019
Local communities: <ul style="list-style-type: none"> Kiyikoy town (Cumhuriyet, Güven, Kale neighbourhoods) Kislacik village Owners and users of the privately-owned parcels acquired by the Project The owner of house in the north of T15 	<ul style="list-style-type: none"> To provide information on the Project, ESIA study findings (including community health and safety), Project SEP and Grievance Mechanism in a timely, transparent, understandable and efficient manner To collect comments, questions and suggestions of the stakeholders for consideration in the ESIA documentation and during Project implementation 	<ul style="list-style-type: none"> Non-technical presentations, Project maps, etc. ESIA Disclosure Package <ul style="list-style-type: none"> ESIA Report ESMMP NTS SEP LRP Brochures/flyers summarising the key Project information and E&S issues relevant to the lay members of the public 	<ul style="list-style-type: none"> ESIA Disclosure meetings (presentations and question and answer sessions) Distribution of the hard copies of the ESIA documentation 	<ul style="list-style-type: none"> Kiyikoy town Kislacik village BEE HQs in Istanbul BEE office in Ankara The administrative building located at the existing Kiyikoy WPP substation site The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Güven and Kale neighbourhoods of Kiyikoy town and Kislacik village) 	<ul style="list-style-type: none"> BEE PR Unit Manager Project Manager Assistant Project Manager Site Manager Project Company CLO External consultants appointed by the Project Company 	Q4 2019

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
			<ul style="list-style-type: none"> Face to face meetings with PAPs and community members 	<ul style="list-style-type: none"> The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kislacik village) 		
Local communities: <ul style="list-style-type: none"> Women (e.g. mushroom collectors in Kislacik) Vulnerable PAPs (e.g. vulnerable person living in the house in the north of T15) 	<ul style="list-style-type: none"> To provide information on the Project, ESIA study findings (including community health and safety), Project SEP and Grievance Mechanism, LRP in a timely, transparent, understandable and efficient manner To collect comments, questions and suggestions of the stakeholders for consideration in the ESIA documentation and during Project implementation 	<ul style="list-style-type: none"> Brochures/flyers summarising the key Project information, E&S issues relevant to the specific stakeholder group, SEP and Grievance Mechanism and related measures defined in the LRP 	<ul style="list-style-type: none"> Distribution of the hard copies of brochures/flyers Non-technical presentations Face to face meetings Focus group discussions 	<ul style="list-style-type: none"> Kiyikoy town Kislacik village The building located in the north of T15 	<ul style="list-style-type: none"> BEE Communications and PR Unit Manager Project Manager Assistant Project Manager Site Manager Project Company CLO External consultants appointed by the Project Company 	Q4 2019
Local and international NGOs and CSOs	<ul style="list-style-type: none"> To provide information on the Project and ESIA study findings in a timely, transparent and efficient manner To respond to specific concerns regarding the Project or local and regional E&S issues 	ESIA Disclosure Package <ul style="list-style-type: none"> ESIA Report ESMMP NTS SEP LRP 	<ul style="list-style-type: none"> E-mail correspondence Face to face meetings with local primary NGOs in Kiyikoy and Kislacik; with other NGOs/CSOs on demand Telephone calls Special engagement methods to be developed based on regular media search 	<ul style="list-style-type: none"> Kiyikoy town Kislacik village Other locations based on demand from NGOs/CSOs (e.g. NGO/CSO offices) 	<ul style="list-style-type: none"> Senior Management BEE HSE Unit Manager (as required) BEE Communications and PR Unit Manager Project Manager (construction phase) Operation Manager (in Operation phase) 	Q4 2019
Media	<ul style="list-style-type: none"> To convey public Project information to wider interested parties in a timely, transparent and efficient manner 	<ul style="list-style-type: none"> Visual materials/ advertisements related to key Project information 	<ul style="list-style-type: none"> Sharing visual materials to be published with local and national media agencies 	<ul style="list-style-type: none"> Internet Newspapers Project Company website 	<ul style="list-style-type: none"> BEE PR Unit Manager BEE Legal and Compliance Manager 	Q4 2019
Internal Stakeholders (including direct and contracted employees)	<ul style="list-style-type: none"> To share information on the Project, workers' rights, working conditions, occupational health and safety requirements, Project-specific E&S policy and ESMS documentation (e.g. E&S man. plans) Ensure successful implementation of the Project SEP including the grievance mechanism 	<ul style="list-style-type: none"> Employee contracts E&S management plans and procedures Announcements related to H&S, grievance mechanism, etc. 	<ul style="list-style-type: none"> Induction and orientation trainings Sharing relevant written documentation with the Project employees 	<ul style="list-style-type: none"> Project Company website Project site 	<ul style="list-style-type: none"> Project Manager Site Manager Assistant Project Manager Project Company HR Unit Manager Project Company Procurement Manager Project Company CLO Project Company Site HSE Manager Contractor and subcontractor Project Managers 	Q4 2019

7.1.2. ESIA Disclosure Meetings

As part of the ESIA disclosure process, community disclosure meetings will be conducted within three-four weeks following the start of the ESIA disclosure process in order to allow sufficient time for the communities to review the Disclosure Package and provide feedback during the meetings. The meetings will be conducted at the following locations:

- Kiyikoy town centre (to cover all the three neighbourhoods)
- Kislacik village

In addition to the community meetings, meetings will be held with the following PAPs in order to inform them about the relevant findings of the ESIA and the planned LRP/RAP processes:

- Owner and users of the privately-owned parcels to be acquired (preferentially through willing-buyer-seller method)
- Vulnerable PAP living in the north of T15 (within setback distance of T15) and owner of the house being used by the vulnerable PAP

The Project Company will announce exact dates and venues of these meetings at least two weeks prior to the meetings dates by using appropriate methods (e.g. announcements to be posted at the offices of headmen, mosques, teahouses, public places visited by women). These announcements will also provide information on the means that can be used to access the ESIA Disclosure Package.

During the ESIA disclosure meetings, the Project Company will present up-to-date information on the Project and the E&S studies as well as their findings in a non-technical context. The Project team will address the questions, comments and suggestions raised/voiced by the participants during the meetings.

The PR Unit Manager and Project Manager of the BEE will be responsible for ensuring that the comments, questions and suggestions are duly addressed in line with the Project SEP. To this end, the questions and comments of the stakeholders will also be incorporated to the final ESIA Disclosure Package in consultation with the lenders, as applicable.

7.1.3. Post ESIA Period

The Project Company will continue to implement the SEP throughout the construction and operation phases of the Project. The Stakeholder Engagement Plan for the Post ESIA period, covering both the external and internal stakeholders, is presented in Table 7-2.

Table 7-2. Stakeholder Engagement Plan during the Construction and Operation Phases (Post ESIA Period)

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
All stakeholder groups including village/neighbourhood headmen, local communities, governmental and non-governmental agencies, media, internal stakeholders, etc.	<ul style="list-style-type: none"> To provide information on the Project, ESIA study and its findings (including community health and safety), Project E&S Management System, Project SEP and Grievance Mechanism in a timely, transparent, understandable and efficient manner 	<ul style="list-style-type: none"> ESIA Disclosure Package (disclosed during the ESIA disclosure phase) <ul style="list-style-type: none"> ESIA Report ESMMP NTS SEP LRP 	<ul style="list-style-type: none"> Keeping digital copies of the ESIA documentation in the public domain 	<ul style="list-style-type: none"> Project Company website (Lenders may also publish on their websites) 	<ul style="list-style-type: none"> Senior Management Team BEE PR Unit Manager BEE HSE Unit Manager 	Start Q4 2019
	<ul style="list-style-type: none"> To provide public with updated information on the Project progress and E&S performance 	<ul style="list-style-type: none"> Public Project Progress E&S Performance Update Reports including key information on Project activities and E&S Performance Announcements/news/feedback on key Project milestones/updates (as needed) 	<ul style="list-style-type: none"> Publishing digital copies on Project website 	<ul style="list-style-type: none"> Project Company website 	<ul style="list-style-type: none"> Senior Management Team BEE PR Unit Manager BEE HSE Unit Manager 	Start Q4 2019 (will continue semi-annually for the construction phase; annually for the operation phase)
	<ul style="list-style-type: none"> To collect feedback, grievances, suggestions related with the Project and current activities on an on-going basis 	<ul style="list-style-type: none"> Grievance form and guidance documents (digital) 	<ul style="list-style-type: none"> Publishing digital copies of the grievance form and guidance on Project website Checking grievances on a daily basis and managing as per the timescales defined in SEP 	<ul style="list-style-type: none"> Project Company website 	<ul style="list-style-type: none"> Senior Management Team BEE PR Unit Manager 	Start Q4 2019 (grievances will be checked on a daily basis throughout the Project construction and operation phases)
Related central governmental agencies	<ul style="list-style-type: none"> To provide up-to-date information on the Project status, current activities To consult with the authorities on permitting, community health and safety management, collaboration mechanisms for emergency preparedness and response, community development 	<ul style="list-style-type: none"> Project Progress Update Reports including key information on Project activities and E&S Performance Information packages including brochures, booklets, posters, flyers, maps summarising the key up-to-date Project information Any specific documentation required by the authorities 	<ul style="list-style-type: none"> Face to face meetings 	<ul style="list-style-type: none"> Ankara Istanbul 	<ul style="list-style-type: none"> BEE Senior Management (as required) BEE PR Unit Manager BEE Legal and Compliance Manager Project Manager (during the construction phase) Operation Manager (during the operation phase) BEE HSE Unit Manager BEE Administrative Affairs Manager Assistant Project Manager 	<ul style="list-style-type: none"> Q4 2019 (as required for the construction period; annually for the operation period)
Related local (provincial, regional or district-level) governmental agencies	<ul style="list-style-type: none"> To provide up-to-date information on the Project status, current activities To consult with the authorities on permitting, community health and safety management, collaboration mechanisms for emergency preparedness and response, community development 	<ul style="list-style-type: none"> Project Progress Update Reports including key information on Project activities and E&S Performance Information packages including brochures, booklets, posters, flyers, maps summarising the key up-to-date Project information Any specific documentation required by the authorities 	<ul style="list-style-type: none"> Face to face meetings 	<ul style="list-style-type: none"> Kirklareli province Vize district Project site Other locations as necessary 	<ul style="list-style-type: none"> BEE Senior Management (as required) BEE HSE Unit Manager (as required) BEE PR Unit Manager (as required) BEE Legal and Compliance Manager (as required) BEE Administrative Affairs Manager (as required) 	<ul style="list-style-type: none"> Q4 2019 (as required for the construction period; semi-annually for the operation period)

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
		<ul style="list-style-type: none"> Summary of monitoring results (including bird and bat monitoring by Independent Ornithology Expert) if requested from the Company by related institutions 	<ul style="list-style-type: none"> E-mail correspondence or other means preferred by the authorities 		<p>During Construction Phase:</p> <ul style="list-style-type: none"> Project Manager Project Assistant Manager Construction (Site) Manager Project Company CLO (Site) Site HSE Senior Specialist <p>During Operation Phase:</p> <ul style="list-style-type: none"> Operation Manager Operation Unit Manager HSE Senior Specialist 	
Headmen (mukhtars) of the local communities: <ul style="list-style-type: none"> Kiyikoy town (Cumhuriyet, Guyen, Kale neighbourhoods) Kislacik village 	<ul style="list-style-type: none"> To provide/exchange up-to-date information on the Project status, current activities, potential E&S impacts of the current activities (according to Project phase), Project E&S Management System, community health and safety management, emergency preparedness and response, community development projects, planned stakeholder engagement events, employment and procurement opportunities, etc. in a timely, transparent, understandable, and efficient manner 	<ul style="list-style-type: none"> Information packages including brochures, booklets, posters, flyers, maps summarising the key up-to-date Project information in a non-technical and comprehensible language/format 	<ul style="list-style-type: none"> Regular or on-demand face to face meetings with Mukhtars at their offices or public places, as appropriate 	<ul style="list-style-type: none"> The headmen offices or other public places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kislacik village) 	<p>During Construction Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Project Manager Project Assistant Manager Construction (Site) Manager Project Company CLO (Site) <p>During Operation Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Operation Manager Operation Unit Manager Chief Technician 	Start Q4 2019 (will continue bi-weekly for the construction phase; monthly for the operation phase)
Local communities: <ul style="list-style-type: none"> Kiyikoy town (Cumhuriyet, Guyen, Kale neighbourhoods) Kislacik village 	<ul style="list-style-type: none"> To provide/exchange up-to-date information on the Project status, current activities, potential E&S impacts of the current activities (according to Project phase), Project E&S Management System, community health and safety management, emergency preparedness and response, community development projects, planned stakeholder engagement events, employment and procurement opportunities, etc. in a timely, transparent, understandable, and efficient manner 	<ul style="list-style-type: none"> Information packages including brochures, booklets, posters, flyers, maps summarising the key up-to-date Project information in a non-technical and comprehensible language/format 	<ul style="list-style-type: none"> Distribution of the information packages and posting/keeping available at public places Periodical community meetings 	<ul style="list-style-type: none"> The headmen offices or other public or private places (e.g. mosques, teahouses) at the affected villages/ neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kislacik village) The administrative building located at the existing Kiyikoy WPP substation site 	<p>During Construction Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Project Manager Project Assistant Manager Construction (Site) Manager Project Company CLO (Site) <p>During Operation Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Operation Manager Operation Unit Manager Chief Technician 	Q4 2019 (will continue quarterly for the construction phase; annually for the operation phase)
	<ul style="list-style-type: none"> To collect feedback, grievances, suggestions related with the Project and current activities on an on-going basis 	<ul style="list-style-type: none"> Information on the communication channels related to submittal of the grievances and their management Grievance forms and guidance documents 	<ul style="list-style-type: none"> Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women) Checking grievances on weekly daily basis and managing as per the timescales defined in SEP 	<ul style="list-style-type: none"> The headmen offices or other public or private places (e.g. mosques, teahouses and places commonly visited by women) at the affected villages/ neighbourhoods (Cumhuriyet, Guven and Kale neighbourhoods of Kiyikoy town and Kislacik village) 	<ul style="list-style-type: none"> Senior Management Team BEE PR Unit Manager Project Company CLO (Site) Operation Unit Manager Chief Technician 	Start Q4 2019 (grievances will be checked on a weekly basis throughout the Project construction and operation phases)
Local communities: <ul style="list-style-type: none"> Women (e.g. mushroom collectors in Kislacik) Vulnerable groups/PAPs 	<ul style="list-style-type: none"> To provide/exchange up-to-date information on the Project status, current activities, potential E&S impacts of the current activities (according to Project phase), Project 	<ul style="list-style-type: none"> Brochures, flyers, materials designed for informing women and vulnerable groups/PAPs on key Project information, E&S issues relevant to the specific stakeholder group, SEP and Grievance 	<ul style="list-style-type: none"> Distribution of the hard copies of brochures, flyers, materials Non-technical presentations Face to face meetings 	<ul style="list-style-type: none"> Kiyikoy town (public or private places where women would feel comfortable to engage with the Project team) 	<p>During Construction Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Project Manager Project Assistant Manager Construction (Site) Manager 	Q4 2019 (will continue quarterly for the construction period; semi-

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
	<p>E&S Management System, community health and safety, access within License Area, emergency preparedness and response, community development projects, special measures considered/ developed for women and vulnerable people etc. in a timely, transparent, understandable, and efficient manner</p> <ul style="list-style-type: none"> To receive feedback, grievances, suggestions related with the Project and current activities on an on-going basis 	Mechanism and related measures defined in the LRP	<ul style="list-style-type: none"> Focus group discussions/ separate informative meetings 	<ul style="list-style-type: none"> Kislacik village (public or private places where women would feel comfortable to engage with the Project team) The building located in the north of T15 	<ul style="list-style-type: none"> Project Company CLO (Site) Qualified women employees/ CLO/external consultants for women meetings <p>During Operation Phase:</p> <ul style="list-style-type: none"> BEE PR Unit Manager Operation Manager Operation Unit Manager Qualified women employees/ CLO/external consultants for women meetings Chief Technician 	annually for the operation period)
Local businesses	<ul style="list-style-type: none"> To share/exchange information on local procurement and service provisions requirements and opportunities 	<ul style="list-style-type: none"> Specially designed information, reports, etc. related to required goods and services 	<ul style="list-style-type: none"> Face to face meetings with the local business in Kiyikoy and Kislacik (serving the tourism sector) E-mail correspondence Telephone calls 	<ul style="list-style-type: none"> Kirklareli Vize district Kiyikoy town Kislacik village Other surrounding districts and local settlements 	<p>Corporate Procurement Manager (as required)</p> <p>During Construction Phase:</p> <ul style="list-style-type: none"> Project Manager Project Assistant Manager Construction (Site) Manager Project Company CLO (Site) <p>During Operation Phase:</p> <ul style="list-style-type: none"> Operation Manager Operation Unit Manager Chief Technician 	<ul style="list-style-type: none"> Q4 2019 (as required)
Local, regional, national and international NGOs and CSOs; universities	<ul style="list-style-type: none"> To respond to specific concerns regarding the Project 	<ul style="list-style-type: none"> Specially designed information materials, reports, etc. in consideration of the specific concerns regarding the project Summary of monitoring results (including bird and bat monitoring by Independent Ornithology Expert) if requested from the Company by related organisations 	<ul style="list-style-type: none"> Face to face meetings with NGOs in Kiyikoy and Kislacik; with other NGOs/CSOs on demand E-mail correspondence Telephone calls Special engagement methods to be developed based on regular media search E-mail correspondence or other means preferred by the authorities 	<ul style="list-style-type: none"> Kiyikoy town Kislacik village Other locations based on demand from NGOs/CSOs (e.g. NGO/CSO offices, universities) 	<ul style="list-style-type: none"> Senior Management BEE HSE Unit Manager (as required) BEE Communications and PR Unit Manager Project Manager (construction phase) Operation Manager (operation phase) 	<ul style="list-style-type: none"> Q4 2019 (as required based on NGO feedback, information requests, etc.)
Media	<ul style="list-style-type: none"> To convey public Project information to wider interested parties in a timely, transparent and efficient manner 	<ul style="list-style-type: none"> Visual materials/ advertisements related to key Project information (may be specially designed depending on public concerns, if there is any) Video/audio records 	<ul style="list-style-type: none"> Sharing visual materials to be published with local and national media agencies 	<ul style="list-style-type: none"> Internet Newspapers Television Radio Project Company website 	<ul style="list-style-type: none"> BEE PR Unit Manager BEE Legal and Compliance Manager 	<ul style="list-style-type: none"> Q4 2019 (as required)
Other Projects (wind power and other sectors)	<ul style="list-style-type: none"> To exchange information/ideas about local employment, local procurement, baseline E&S data, community development opportunities, etc. To collaborate for the management of cumulative impacts 	<ul style="list-style-type: none"> Specially designed data, reports, etc. 	<ul style="list-style-type: none"> Face to face meetings E-mail correspondence Telephone calls 	<ul style="list-style-type: none"> Kiyikoy WPP Project Site Other Project Sites 	<p>During Construction Phase:</p> <ul style="list-style-type: none"> Project Manager Project Assistant Manager Construction (Site) Manager Site HSE Senior Specialist 	<ul style="list-style-type: none"> Q4 2019 (as required)

Stakeholder	Purpose of Engagement	Documents/Materials to be Used for Engagement	Engagement Method	Location	Responsible Party	Timetable for Implementation
					<ul style="list-style-type: none"> Project Company CLO (Site) <p>During Operation Phase:</p> <ul style="list-style-type: none"> Operation Manager Operation Unit Manager HSE Senior Specialist Chief Technician 	
Lenders	<ul style="list-style-type: none"> To inform/update the Lenders about Project's E&S Performance To fulfil the requirements of EBRD PRs 	<ul style="list-style-type: none"> Periodical Post Financial Close E&S Monitoring Reports Summary of monitoring results (including bird and bat monitoring by Independent Ornithology Expert) if requested from the Company by Lenders 	<ul style="list-style-type: none"> Face to face meetings E-mail correspondence Telephone calls 	<ul style="list-style-type: none"> Project site Other locations as required 	<p>Senior Management Team</p> <p>BEE Corporate HSE Unit Manager</p> <p>BEE Corporate PR Unit Manager</p> <p>Project Manager (during construction)</p> <p>Operation Manager (during operation)</p>	<ul style="list-style-type: none"> Q4 2019 (at frequencies to be determined by lenders; might be quarterly during the construction phase; semi-annual during the first two years of the operation phase; annual in the rest of operation phase throughout the financing period)
Internal Stakeholders (including direct and contracted employees)	<ul style="list-style-type: none"> To share information on the Project, workers rights, working conditions, occupational health and safety requirements, Project-specific E&S policy and ESMS documentation (e.g. E&S man. plans) Ensure successful implementation of the Project SEP including the grievance mechanism 	<ul style="list-style-type: none"> Employee contracts Code of Conduct Company bulletin boards Through worker representatives selected by the employees E&S management plans and procedures Announcements related to H&S Grievance forms and guidance Training materials/presentations 	<ul style="list-style-type: none"> Sharing relevant written documentation with the Project employees (at the time of hiring) Induction and orientation trainings (at the time of hiring) Toolbox trainings (daily before start of shift during the construction phase) Job-specific trainings (at the time of hiring and quarterly for refreshment) Trainings on E&S Management System (including internal grievance mechanism and specific trainings for security personnel as per EBRD PR4) (at the time of hiring and quarterly for refreshment during the construction; annually for refreshment during the operation) Emergency Preparedness Drills (frequencies to be specified in the Project-specific Emergency Preparedness and Response Plan) Periodical (e.g. monthly) H&S Committee Meetings 	<ul style="list-style-type: none"> Project Company website Project site 	<p>During Construction Phase:</p> <ul style="list-style-type: none"> BEE HR Unit Manager BEE PR Unit Manager Project Manager Project Assistant Manager Construction (Site) Manager Site HSE Senior Specialist Project Company CLO (Site) External HSE Consultancy Companies to be appointed by Project Company <p>During Operation Phase:</p> <ul style="list-style-type: none"> BEE HR Unit Manager BEE PR Unit Manager Operation Manager Operation Unit Manager HSE Senior Specialist External HSE Consultancy Companies to be appointed by Project Company 	<ul style="list-style-type: none"> Q4 2019 (frequencies specified for each engagement methods)

8. GRIEVANCE MECHANISM

At the corporate level, BEE has the following procedure, guidelines and forms documentation related to the grievance mechanism, which are applicable to all projects of the Company including Kiyikoy WPP:

- Corporate Social Impact Assessment and Stakeholder Communication Procedure,
- Corporate Social Monitoring and Grievance Mechanism Procedure,
- Social Guidelines for Borusan EnBW Site Personnel,
- Notification and Communication Opening and Closure Forms.

BEE has a grievances/comments database (i.e. BEE Systems, Applications and Products -SAP- Portal as per the Corporate Social Monitoring and Grievance Mechanism Procedure) in place for the recording and management of grievances/comments received from the stakeholders.

The Project Company will activate and operate a grievance mechanism for the Kiyikoy WPP in line with the corporate procedures and guidelines as well as EBRD PR1 and PR10.

The planned organisational structure of the ESMS Team and detailed descriptions of the roles and responsibilities with regard to SEP and Project grievance mechanism implementation is provided in Chapter 6. During the construction phase, the Project Company will employ a CLO, who will be responsible from the management of grievances in line with this SEP. During the operation phase the Operation Unit Manager will act as the CLO and have the responsibility for managing grievances.

8.1. Grievance Mechanism for Public

The existing Kiyikoy WPP has adopted the Corporate Social Monitoring and Grievance Mechanism Procedure for the management of potential grievances/comments from the public. Based on the corporate procedure, the grievance mechanism that will be provided for the external stakeholders as part of the Capacity Extension Project is presented below:

- External stakeholders can initiate the grievance/comment mechanism by using the following methods:
 - Grievance/comment boxes and forms² (see Appendix C) to be placed at public places including places commonly/comfortably visited by women)
 - Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. site chiefs/managers, CLOs)
 - Telephone (the contact numbers that can be used to submit grievances/comments) of the CLO will be shared with the local communities in due course)
 - E-mail (the e-mail address for the submittal of grievances/comments will be shared with the local communities in due course)
 - Website (the contact number of the CLO will be shared with the local communities in due course)

² As per the Corporate Social Monitoring and Grievance Mechanism Procedure, BEE has in place the "Project Notification and Communication Opening Form" and "Project Notification and Communication Closing Form", is are specially designed to collect questions, complaints, requests and recommendations and give feedback to the questions, complaints, requests and recommendations. Project Notification and Communication Opening Form is referred to as grievance/comment form in this SEP.

- A guidance note (signed by a Project representative) will be posted next to the grievance boxes to guide the grievance/comment holders on how to fill the form. This guidance will specify that all sections of the grievance/comment form should be filled out by the grievance/comment holder.
- If the grievance/comment holder would like to fill the form anonymously, the form will allow the grievance/comment holder to file it without any personal contact information.
- For grievances/comments received verbally in person, the Project representatives will request the grievance/comment holder to fill the form himself/herself by providing required guidance, where necessary. If the grievance/comment holder wishes the form to be filled out by the Project representatives, they will fill the form on behalf of the grievance/comment holder. In such cases, the grievance/comment holder will be required to read the filled form and both the grievance/comment holder and the Project representative who filled the form will be required to approve and sign the form. The Project representative will provide a copy of the filled form to the grievance/comment holder stakeholder.
- The Site CLO (construction)/Operation Unit Manager (operation) will ensure that the grievance/comment forms are collected from the grievance/comment boxes on a weekly basis.
- Within maximum 3 days (at the same day whenever possible) of collecting/receiving the form (from the boxes or in person), the CLO will record the form in the grievance/comments database (i.e. BEE SAP Portal) and initiate the evaluation process.
- The CLO, at the same time, will upload the original copy of the grievance/comment form and his/her pre-assessment into the grievance/comments. In addition, the CLO will add into the database all other documents and visuals (photos, videos etc.) which s/he deems necessary in her/his opinion. In the pre-assessment, the CLO evaluates the following issues in collaboration with concerned units whenever needed:
 - - its priority degree (considering the dynamics of the Project site/location among the other grievance/comment launched);
 - the action items to be followed to solve the grievance;
 - if applicable its approximate cost;
 - the opinion of the highest-ranking local authority (e.g. village/neighbourhood headmen)
- Upon saving of the grievance, its appendices and CLO opinion in the database, grievance/comment holder will be informed by an automatic short message service (SMS) within 3 days of receiving the grievance, indicating that the request has been taken into consideration. The SMS will contain the subject of the grievance/comment Form and the proposed feedback time, if needed/possible.
- The CLO will inform the PR Unit Manager and Project/Operation Manager about the grievance/comment and the on-going resolution process.
- Following the PR Unit Manager's evaluation of the grievance/comment;
 - If it is a question or recommendation, PR Unit Manager, in consultation with CLO and Project Manager/Operation Manager, will prepare the feedback right away.
 - If it is a complaint or request, the PR Unit Manager or the expert assigned by him/her will make the initial evaluation in collaboration with the Project Manager/Operation Manager and the CLO. The PR Unit Manager, Project Manager/Operation Manager and the CLO will make the final decision regarding the action to be taken for the management/resolution of the grievance/comment by taking the following criteria into consideration and enter the final decision into the grievance/comment database:

- cost/benefit analysis of the proposed action;
 - monetary requirements;
 - doability in practice;
 - efficiency (on stakeholder).
- The CLO will inform the stakeholder about the feedback of the Company for the grievance/comment through the grievance/comment close out form³ within maximum 30 days of receiving grievance/comment (see Appendix C).
- Grievances/comments submitted to other BEE/Project personnel verbally during face-to-face meetings or through telephone calls or e-mails will be transmitted by the receiver of the grievance/comment to the Site CLO (construction)/Operation Unit Manager (operation) for recording.
- Grievances/comments submitted through the website (the grievance/comment form presented in Appendix C will be uploaded to a designated website (to be activated prior to disclosure) and kept in the public domain throughout the Project) will be checked and coordinated by the Corporate PR Unit. They will also be transmitted to the Site CLO (construction)/Operation Unit Manager (operation) for site records.

Contractors/subcontractors will be responsible for providing their personnel with access to the grievance mechanism defined in this SEP, collect the grievances/comments accordingly, inform the Project Company site/operation managers and CLOs immediately upon receipt and take the actions for the management/resolution of the grievance with approval from the Project Company site/operation managers and in coordination with the CLOs.

³ Referred to as Notification and Communication Closing Form in the corporate procedures.

8.2. Grievance Mechanism for Internal Stakeholders

Internal stakeholders are the workers, managers, representatives and suppliers who work for the Project Company and its contractors/subcontractors. The grievance mechanism that will be provided for the internal stakeholders is presented below:

- Internal stakeholders can initiate the grievance/comment mechanism by using the following methods:
 - Grievance/comment boxes and forms (Located at the operations building and the construction site of the contractor)
 - E-mail
 - Telephone
 - Petition
 - Verbally (directly or through site chiefs/managers, CLOs, corporate HR Manager/Experts)
 -
- While filing the grievance/comment, the workers will have an option for anonymous filing.
- The grievances/comments received by the site personnel will be transmitted to the Site CLO (construction)/Operation Unit Manager (operation) for recording.
- After being recorded, the grievance/comment will be transmitted to the Corporate HR Unit within three days. The Corporate HR Unit will coordinate with the relevant unit for the management/resolution of the grievance.
- A database of all internal grievances/comments received through different channels will be kept by the Corporate HR Unit.
- Upon saving of the grievance, its appendices and HR Expert opinion in the database, grievance/comment holder will be informed by an automatic short message service (SMS) within 3 days of receiving the grievance, indicating that the request has been taken into consideration. The SMS will contain the subject of the grievance/comment Form and the proposed feedback time, if needed/possible.
- The concerned unit will provide the HR Unit with their evaluation and suggestions for the resolution of the respective grievance/comment in writing on the grievance/comment form, within 7 days after being contacted by the HR Expert.
- HR Expert will prepare the draft response and submits it to the approval of the Corporate HR Unit Manager, who would consult with the Senior Management Team, as appropriate. The Senior Management Team will decide on the content of the response and approve it within 14 days of receiving grievance.
- The written response will be transmitted to the applicant/complainant by the HR Unit within maximum 30 days of receiving grievance/comment. For all records, excluding those requiring confidentiality, Corporate HR Unit Manager will be informed.
- Following the response, grievance/comment database is updated depending on the acceptance of the resolution by the applicant/complainant.

Contractors/subcontractors will be responsible for providing their personnel with access to the grievance mechanism defined in this SEP, collect the grievances/comments accordingly, inform the Project Company site/operation managers and CLOs immediately upon receipt and take the actions for the management/resolution of the grievance with approval from the Project Company site/operation managers and in coordination with the CLOs.

9. MONITORING AND REPORTING

The SEP will be periodically (at least annually) reviewed and updated, as necessary, during the course of the Project implementation. The Company will record all incoming grievances in the corporate grievance/comment database (i.e. SAP Portal).

Quarterly summaries will be used to assess both the number and nature of grievances/comments (if any), along with the Company's ability to address grievances/comments in a timely and effective manner during the construction phase. The SEP Monitoring Framework for Kiyikoy WPP is described below in Table 9-1.

Table 9-1. SEP Monitoring Framework for Kiyikoy WPP

Monitoring Focus	Monitoring Indicator	Project Phase	Monitoring Frequency	Parties Responsible for the Monitoring
Public consultation process	<ul style="list-style-type: none"> -Number of stakeholder meetings (e.g. public consultation meetings, governmental authority visits, focus group meetings, face to face meetings, etc.) -Location of stakeholder events -Number of participants to the meetings, persons consulted, etc. - Frequency of the visits paid to the settlements affected by the Project 	Construction	Quarterly	Project Manager PR Unit Manager
		Operation	Semi-annually in the first two years; Annually afterwards	Operation Manager PR Unit Manager
External grievance mechanism	<ul style="list-style-type: none"> -Number of grievances/comments raised per settlement - Categories of the grievances/comments (e.g. land access, noise, air quality, etc.) - Response timescales for each grievance - Status of grievances (open/closed) -Number of grievances that are on hold/ or disagreed 	Construction	Quarterly	Project Manager PR Unit Manager
		Operation	Semi-annually in the first two years; Annually afterwards	Operation Manager PR Unit Manager
Internal grievance mechanism	<ul style="list-style-type: none"> -Number of grievances/comments raised by direct employees -Number of grievances/comments raised by contracted employees - Categories of the grievances/comments (e.g. working conditions, hygiene, health and safety, etc.) - Response timescales for each grievance - Status of grievances (open/closed) -Number of grievances that are on hold/or disagreed 	Construction	Quarterly	Project Manager HR Manager
		Operation	Semi-annually in the first two years; Annually afterwards	Operation Manager HR Manager

In addition, SMC Committee of BEE will also monitor and evaluate the SEP implementations as necessary. Summaries of grievances raised by internal and external stakeholders, queries and related incidents together with the implementation status of corrective/preventive actions will be referred the Company's senior management through ad hoc SMC Committee meetings.

The Project Company will undertake on-going reporting to public on Project's E&S performance with periodical report published on Project Company's website. The frequency of the reporting will be done semi-annually in construction and annually in operation.

10. CONTACT INFORMATION FOR THE STAKEHOLDERS

Project Company website	https://www.alenkaenerji.com.tr/
Borusan EnBW Istanbul Office	Address: Pürtelaş Hasan Efendi Mah. Meclisi-Mebusan Cad. No:35/7 Salıpazarı Beyoglu Istanbul /Türkiye Tel: +90 212 340 27 60
Borusan EnBW Ankara Office	Address: Kızılırmak Mah. 1450.Sok. No:3, Ankara Ticaret Merkezi A Blok Kat: 5 No:31 Çukurambar-Çankaya, Ankara / Türkiye Tel: +90 312 447 96 19
Alenka Enerji	Address: Kiyıkoy, Vize / Kırklareli Tel +90 288 213 15 45 E-mail: info@alenkaenerji.com Contact details of the CLO will further be provided.

APPENDICES

APPENDIX A. CONTACT INFORMATION OF STAKEHOLDERS

Stakeholder Groups	Stakeholders	Contact Details
External Stakeholders		
National Governmental Organizations and Public Enterprises	Ministry of Energy and Natural Resources	Address: Turkocagi Cad. No:2 Pk: 06100 Cankaya/ANKARA Telephone: +90 (312) 212 6420
	Ministry of Agriculture and Forestry	Address: Bestepe Mah. Alparslan Turkes Cad. No: 71 - Yenimahalle/ANKARA Telephone: +90 (312) 207 5000
	Ministry of Environment and Urbanization	Address: Mustafa Kemal Mahallesi Eskisehir Devlet Yolu 9. km. No: 278 Cankaya / ANKARA Telephone: 0312 410 1000 E-mail: cevrevesehirclilikbakanligi@hs01.kep.tr
	Ministry of Labor and Social Security	Address: Emek Mahallesi, 17. Cadde No:13 Çankaya / ANKARA Telephone: +90 (312) 296 6000
	Energy Market Regulatory Authority	Address: İşçi Blokları Mahallesi Muhsin Yazıcıoğlu Caddesi No:51/C Yüzüncüyıl/Çankaya/ANKARA Telephone: 0312 201 4000
	State Hydraulic Works	Address: Devlet Mahallesi , İnönü Bulvarı No: 16 Çankaya / ANKARA Telephone: 0312 454 5454
	Turkish Electricity Transmission Company (TEIAS)	Address: Nasuh Akar Mah. Turkocagi Cad. No:12 Balgat/ANKARA Telephone: +90 (312) 222 8160
	Governorship of Kırklareli	Address: Karakaş Mahallesi, 39020 Kırklareli Merkez/Kırklareli Telephone: 0288 212 51 73
	Vize District Governorate	Address: Devlet Mah. Mahmut Erbil Cad. Kaymakamlık Binası Vize Telephone: 0288 318 10 26
	Vize Municipality	Address: Devlet Mah. Atatürk Cad. Belediye Binası Vize Telephone: 0288 318 10 21
	Kıyıköy Municipality	Address: Kıyıköy belediye Başkanlığı Telephone: 0288 388 60 03
	Vize District Directorate of Agriculture	Address: Devlet Mahallesi, 39460 Vize/Kırklareli Telephone: 0288 318 10 15
	Vize Directorate of Forestry	Address: Devlet Mahallesi, 39460 Vize/Kırklareli Telephone: 0288 318 10 84
	Kıyıköy Forestry Sub-District Directorate	Address: Cumhuriyet Mah.No:1/2 PK. 39480 Kıyıköy/Vize/KIRKLARELİ Telephone: 0288 388 60 13
	Vize Gendarmerie	Address: Mimar Sinan Mh., Karakol Cd., 39400 Vize/Kırklareli
	Vize District Police Headquarters	Address: Devlet Mahallesi, 39460 Vize/Kırklareli
	Local Emergency and Health Services	Various
	Kırklareli City Council	Telephone: 0288 214 69 93
Non-governmental Organizations	Nature Association	Address: Kızılay Mahallesi, Menekşe-2 Sk. 33/5 Çankaya/Ankara Telephone: +90 312 481 25 45

Stakeholder Groups	Stakeholders	Contact Details
	Environment Foundation of Turkey	Address: Tunali Hilmi Cad. No:50/20 Cankaya/ANKARA Telephone: +90 (312) 425 55 08 E-mail: cevre@cevre.org.tr
	WWF Turkey	Address: Buyuk Postane Cad. No: 19 Kat: 5 Bahcekapi Fatih/ISTANBUL Telephone: +90 (212) 528 2030 E-mail: info@wwf.org.tr
	TEMA Vize	Address: Mimar Sinan Mah. Kale Cad. 23/B Vize Telephone: 0537 239 16 44
	Kırklareli Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB)	Address: ARACAİBRAHİM MAH. MUSTAFA KEMAL BULVARI NO:13 TAŞKIN APT. K.1 MERKEZ - KIRKLARELİ Telephone: 0 288 2125455
	Kırklareli Branch Office of Chamber of Environmental Engineers	
	Kırklareli Branch Office of Chamber of Electrical Engineer	
	Kırklareli Branch Office of Chamber of Medical Doctors	Address: Karakaş Mahallesi Fevzi Çakmak Bulvarı, Yenigün Gül Apt. No:22 Kat : 1 Kırklareli Telephne: 0288 212 49 45
	The Thracian Platform	Telephone: 0288 214 69 93
	Kırklareli Bar Association	Address: Kocahıdır Mahallesi, Paşa Çeşme Cd. No:3, 39100 Kırklareli Merkez/Kırklareli Telephone: 0288 214 13 16
	Vize Chamber of Agriculture	Address: Devlet Mah. Çukurçeşme Sok. Vize Telephone: 0288 318 10 95
	Vize Cattle Breeders Association	Telephone: 0530 230 13 30
	Kıyıköy Fisheries Cooperative	Telephone: 0533 636 61 88
	Vize Beekeepers Association	Address: Vize Municipality square Telephone: 0530 933 65 87
	Kırklareli Beekeepers Association	Address: Tarım İl Müdürlüğü /Kırklareli Telephone: 0288 214 35 47
	Women associations	Various
	Vize Association of Mukhtars	Telephone: 0288 368 94 75
	Vize Association for the Preservation of Farmers' Assets	Telephone: 0537 681 98 78
	Vize Union of Chamber of Merchants and Craftsmen	Address: Devlet Mahallesi, Değirmen Sk., 39400 Vize /Kırklareli Telephone: 0288 318 07 30
	Development Cooperative of Kıyıköy	Telephone: 05446876284
	Development Cooperative of Kışlacık	Telephone: 05352230901
	Vize Hunters Association	Address: Devlet Mah. Haliçi Belediye Pasajı No: 9 Telephone: 0288 318 23 09
Local Communities/ Residents	Kışlacık mukhtar Cumhuriyet mukhtar Güven mukhtar Kale mukhtar	Various
Education Institutions	Kırklareli University	Address: Kayalı Kampüsü Merkez / KIRKLARELİ Telephone: 444 40 39
	Vize Vocational School	Address: Devlet Mah. 8 nolu Cad. No:30 Vize Telephone: 0288 318 34 44
	Vize Public Education Center	Address: Devlet Mahallesi, Orman Cad. No:3, 39400 Vize/Kırklareli Telephone: 0288 318 11 30
Local Media	Vize Haber newspaper	Address: Evren Mah. Bağlar Cad. Vize Telephone: 0288 318 31 91

APPENDIX B. SAMPLE STAKEHOLDER ENGAGEMENT LOG

[illegible]

APPENDIX C. GRIEVANCE/COMMENT FORMS

C.1. GRIEVANCE/COMMENT FORM (NOTIFICATION AND COMMUNICATION OPENING FORM)

FORM INFORMATION				
Form Number				
Date				
Record taken by:				
STAKEHOLDER INFORMATION				
Name Surname (stakeholder can remain anonymous if preferred or request not to disclose his/her identity to the third parties without his/her consent)				
ID Number:				
Cell phone:				
Address				
E-mail (<i>optional</i>)				
Project/ Power Plant				
Issue	Question	Complaint	Request	Recommendation/ Other

<p>Brief Information</p>												
<p>Degree of Influence (lowest 1; highest 10)</p>	<table border="1"> <tr> <td>0</td> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>7</td> <td>8</td> <td>9</td> <td>10</td> </tr> </table>	0	1	2	3	4	5	6	7	8	9	10
0	1	2	3	4	5	6	7	8	9	10		

Request Owner Signature

Recorded by - Signature:

C.2. GRIEVANCE/COMMENT CLOSE OUT FORM (NOTIFICATION AND COMMUNICATION OPENING FORM)

FORM INFORMATION				
Form Number				
Date				
Closed by:				
QUESTION/COMMENT/REQUEST/RECOMMENDATION (QCRR) INFORMATION				
Project/ Power Plant Name				
Issue	Question	Complaint	Request	Recommendation/ Other
QCRR Explanation				
Solution / Implementation Actions and Costs				

Conditions and Other Measures	
Visual List	

Request Owner Signature
Recorded by - Signature

GEM

www.gemtr.com