



**TOSYALI OSMANİYE SOLAR POWER PLANT PROJECT  
STAKEHOLDER ENGAGEMENT PLAN**

**January 2026**

**CNR-PLN-TOS-OSM-SEP-001**

**(Final)**

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 2 / 123



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<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 3 / 123

### DOCUMENT REVISION HISTORY SHEET

Rev.	Date	Prepared by	Checked by	Approved by	Description
00	28.03.2025	Sıla TONBUL	Özge ÇELİK Kübra ÖZSOY	Ayşe CANBAZ AKKURT Ali YILMAZ	Draft
01	02.05.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.01
02	23.05.2025	Kübra ÖZSOY	Özge ÇELİK	Ayşe CANBAZ AKKURT	Rev.02
03	16.06.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.03
04	07.11.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.04
05	12.01.2026	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Final

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 4 / 123

## TABLE OF CONTENTS

<b>TABLE OF CONTENTS</b> .....	4
<b>LIST OF TABLES</b> .....	6
<b>LIST OF FIGURES</b> .....	7
<b>ABBREVIATIONS/DEFINITIONS</b> .....	8
1 INTRODUCTION.....	11
1.1 Project Overview.....	11
1.2 Scope and Objectives of SEP .....	15
2 REGULATORY FRAMEWORK .....	16
2.1.1 National Legislation.....	16
2.1.2 International Requirements .....	17
2.1.3 Requirements of IFC’s PS1 in line with Stakeholder Engagement.....	19
2.1.4 Applicable Policies and Practices of the Project Company .....	20
3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES .....	21
3.1 National EIA Process .....	21
3.2 Scoping Studies .....	22
4 STAKEHOLDER IDENTIFICATION.....	25
4.1 Social Impact Area.....	25
4.2 Identification of Stakeholders .....	28
4.3 Disadvantaged/Vulnerable Individuals or Groups (DVI).....	29
5 STAKEHOLDER ENGAGEMENT PROGRAM .....	31
5.1 Proposed Strategy for Information Disclosure .....	31
5.2 Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups .....	34
5.2.1 Yörüks.....	37
5.2.2 The High School.....	39
6 RESOURCES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES..	46
6.1 Implementation Arrangements .....	46
6.2 Roles and Responsibilities .....	46
7 GRIEVANCE MECHANISM .....	57
7.1 Purpose and Scope .....	57
7.2 GM contact information .....	57
7.3 Principles of Grievance Mechanism .....	59
7.4 Workers’ Grievance Mechanism .....	60

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 5 / 123

8	MONITORING and REPORTING .....	66
8.1	Monitoring Reports in the Course of the Project.....	66
8.2	Involvement of Stakeholders in Monitoring Activities .....	66
8.3	Reporting Back to Stakeholder Groups .....	66
9	APPENDICES .....	73
	Appendix 1 Grievance Registration Form.....	73
	Appendix 2 Grievance Closeout Form .....	75
	Appendix 3 Grievance Evaluation Form (F.01.07.06) and PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration (F.01.07.05).....	76
	Appendix 4 List of stakeholders .....	81
	Appendix 5 Photographs taken during the meeting.....	84
	Appendix 6 Documents related to public participation meeting , 28.01.2025.....	102
	Appendix 7 Findings of Realized Consultations & Interviews .....	107
	Appendix 8 Stakeholder Engagement Activities Undertaken by Tosyalı for the Tosyalı SPP Project .....	117
	Informative Brochure_Project Information (Page 1).....	117
	Informative Brochure_Project Information (Page 2).....	118
	Informative Brochure_Livelihood Restoration Plan (Page 1).....	119
	Informative Brochure_Livelihood Restoration Plan (Page 2).....	120
	Informative Brochure_Code of Conduct.....	121
	Suggestion QR Code Poster .....	122
	Complaint Box and QR Code in Toprakkale Türkmen Town Municipality .....	123

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 6 / 123

## LIST OF TABLES

Table 1. Osmaniye ETL Expropriation Area.....	13
Table 2. National Legislation Relevant to Stakeholder Engagement.....	16
Table 3. Stakeholder consultations prior to scoping activities .....	22
Table 4. Stakeholder consultations prior to livelihood restoration activities .....	24
Table 5. Proposed Strategy for DVIG .....	35
Table 6. Stakeholder Engagement Plan .....	42
Table 7. General Roles and Responsibilities for the Implementation of the ESMP .....	47
Table 8. Roles and Responsibilities for the Implementation of the SEP.....	52
Table 9. Current locations of communication tools .....	58
Table 10. Monitoring Plan.....	69

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 7 / 123

## LIST OF FIGURES

Figure 1: Social Impact Area of the Project.....	26
Figure 2: Satellite Image of the Project Area and ETL to be constructed .....	27
Figure 3. Organizational Structure of the Project Owner.....	47
Figure 4: Grievance Mechanism Flowchart.....	65

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 8 / 123

## ABBREVIATIONS/DEFINITIONS

<b>A.Ş.</b>	Incorporated Company
<b>AC</b>	Alternating Current
<b>Aol</b>	Area of Influence
<b>AQMP</b>	Air Quality Management Plan
<b>BAT</b>	Best Available Techniques
<b>BBVA</b>	Banco Bilbao Vizcaya Argentaria
<b>BMP</b>	Biodiversity Management Plan
<b>BREF</b>	Best Available Techniques Reference Document
<b>CESCE</b>	Spanish Export Credit Agency
<b>CHMP</b>	Cultural Heritage Management Plan
<b>CHSS</b>	Community Health, Safety and Security
<b>CHSSMP</b>	Community Health, Safety and Security Management Plan
<b>ÇİMER</b>	Presidential Communication Center
<b>ÇINAR / Consultant</b>	Çınar Mühendislik Müşavirlik A.Ş.
<b>CLO</b>	Community Liaison Officer
<b>CMP</b>	Contractor Management Plan
<b>DC</b>	Direct Current
<b>DVIG</b>	Disadvantaged/Vulnerable Individuals or Groups
<b>E&amp;S</b>	Environmental and Social
<b>EHS</b>	Environment, Health and Safety
<b>EIA</b>	Environmental Impact Assessment
<b>EIGE</b>	European Institute for Gender Equality
<b>EP</b>	Equator Principles
<b>EPC</b>	Engineering, Procurement and Construction
<b>EPRP</b>	Emergency Preparedness and Response Plan
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESS</b>	Environmental and Social Standard
<b>ETL</b>	Energy Transmission Line
<b>EU</b>	European Union
<b>FI</b>	Financial Intermediaries
<b>FRA</b>	European Union Agency for Fundamental Rights
<b>GBIF</b>	Global Biodiversity Information Facility
<b>GBV</b>	Gender-Based Violence
<b>GHG</b>	Greenhouse Gas
<b>GM</b>	Grievance Mechanism
<b>GMP</b>	Good Manufacturing Practices
<b>GRC</b>	Grievance Redressal Committee
<b>GRM</b>	Grievance Redress Mechanism

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 9 / 123

<b>HR</b>	Human Resources
<b>HSE</b>	Health, Safety and Environmental
<b>ICCPR</b>	United Nations International Covenant on Civil and Political Rights
<b>ICESCR</b>	United Nations International Covenant on Economic, Social and Cultural Rights
<b>IFC</b>	International Finance Corporation
<b>İnojen</b>	İnojen Enerji Teknolojileri ve Yatırımları Anonim Şirketi
<b>İŞKUR</b>	Turkish Employment Agency
<b>ISMS</b>	Information Security Management System
<b>ISO</b>	International Organization for Standardization
<b>JHSU</b>	Joint Health and Safet Unit
<b>km</b>	Kilometers
<b>Kocabey</b>	Kocabey Hafriyat Nak. ve İnş. Taah. Tic. Ltd. Şti.
<b>KPI</b>	Key Performance Indicator
<b>KVKK</b>	Personal Data Protection Law
<b>kWh</b>	Kilowatt-hour
<b>LMP</b>	Labor Management Plan
<b>LRP</b>	Livelihood Restoration Plan
<b>Mast Enerji</b>	Mast Enerji ve Teknolojileri A.Ş.
<b>MoM</b>	Minutes of Meetings
<b>NGO</b>	Non-Governmental Organization
<b>No.</b>	Number
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>OHS</b>	Occupational Health and Safety
<b>OHSMP</b>	Occupational Health and Safety Management Plan
<b>OIP</b>	Other Interested Parties
<b>OIZ</b>	Organized Industrial Zone
<b>OOSB</b>	Osmaniye Organized Industrial Zone
<b>PAP</b>	Project Affected Parties
<b>Project</b>	Tosyalı Osmaniye Solar Power Plant Project
<b>PS</b>	Performance Standards
<b>PV</b>	Photovoltaic
<b>QMS</b>	Quality Management System
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SEA / SH</b>	Sexual Exploitation and Abuse / Sexual Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>SH</b>	Sexual Harassment
<b>SPP</b>	Solar Power Plant
<b>TBD</b>	To be determined later
<b>TBMM</b>	Grand National Assembly of Türkiye
<b>TC</b>	Transformer Center

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 10 / 123

<b>TEİAŞ</b>	Turkish Electricity Transmission Company
<b>TİHEK</b>	The Human Rights and Equality Institution of Türkiye
<b>TOPCon</b>	Tunnel Oxide Passivated Contact
<b>Tosyalı Owner</b> / <b>Project</b>	Tosyalı Demir Çelik Sanayi A.Ş.
<b>WB</b>	World Bank
<b>WGM</b>	Workers' Grievance Mechanism
<b>YİMER</b>	Foreigners Communication Center

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 11 / 123

## 1 INTRODUCTION

Engaging with stakeholders forms the foundation for cultivating robust, positive, and responsive relationships crucial to effectively managing the environmental and social impacts of the project. The goal of stakeholder engagement is to disclose and consult with stakeholders about the environmental and social risks and impacts of the project and to establish and sustain positive connections with diverse external stakeholders throughout the project's lifecycle. Initiating the engagement process early on ensures timely public access to pertinent information, allowing stakeholders to participate in project design and impact assessment.

The Stakeholder Engagement Plan (SEP) will consistently facilitate communication between the Investor and various stakeholders. Regular sharing of project details, environmental and social risks, mitigation strategies, and the grievance mechanism will occur. The SEP will involve identifying stakeholders to be engaged during land preparation, construction, and operation phases, along with specifying communication tools, the grievance mechanism, and responsible parties. Recognizing that stakeholder engagement is an ongoing process, it is crucially updated and integrated into the Environmental and Social Impact Assessment (ESIA) Report.

### 1.1 Project Overview

The Project, titled "Tosyalı Osmaniye Solar Power Plant (SPP)," is planned to be developed and operated by Tosyalı Demir Çelik Sanayi Anonim Şirketi ("Tosyalı" or "Project Owner") in Osmaniye Province, Toprakkale District, Türkmen/Büyüktüysüz Village, on Parcel 246/2.

Tosyalı is expecting to secure financing for the Osmaniye SPP Project from the Spanish Export Credit Agency (CESCE) and the Project is expected to be financed by Banco Bilbao Vizcaya Argentaria (BBVA). Therefore, the Project must comply with the environmental and social policies of CESCE and BBVA. In this regard, an agreement was signed, between the Project Owner and ÇINAR Engineering Consulting Inc. (ÇINAR / Consultant) for the preparation of environmental and social reports. This agreement defines the tasks to be carried out by ÇINAR.

The Project aligns with Türkiye's Environmental Impact Assessment (EIA) Regulation, and an "EIA Positive Certificate" is obtained on 23.01.2025 with the decision no of 8155.

The Project site, officially reclassified as non-agricultural land by the Osmaniye Provincial Directorate of Agriculture and Forestry, was allocated to the Project Owner by the Ministry of Industry and Technology.

With a planned capacity of 120.56 MWp/88 MWe over an area of 147.28 hectares, the Project aims to generate approximately 245 million kWh of electricity annually.

The Project supports Türkiye's energy transition policies and contributes to climate change mitigation by reducing reliance on fossil fuels and lowering greenhouse gas emissions.

Within the scope of the Project, pre-construction, mobilization and temporary construction site establishment works, land preparation works, construction activities, installation of mounting structures and solar panels, installation of switchgear center, electrical connections, connections to the national grid system and transition to operation/commissioning will be carried out.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 12 / 123

The construction and installation phase of the Project is expected to take 12 months, with an anticipated economic lifespan of 25 years. During the construction phase, it is expected to employ 350 workers, while 25 personnel will be working during the operation phase.

In Tosyalı Osmaniye SPP Project, Monocrystalline Half-Cut Photovoltaic Modules will be used to generate direct current (DC) electricity. The generated energy will be converted into alternating current (AC) through high-efficiency inverters and integrated into the national grid. A total of 166,292 tracker panels (725 Wp each) are planned to be installed under the proposed Project.

The solar modules to be used in the Project are designed with a movable structure to maximize sunlight capture.

The tracker system enables the panels to follow the sun's rays, is an Infinity model and has a self-powered structure.

Monocrystalline cells are typically dark black in color with a distinctive smooth appearance. They are made from single crystal silicon, which provide higher energy efficiency compared to other types of cells. These panels can generate energy even under low light conditions and are a preferred choice for sustainable energy production due to their long economic lifespan.

The Project will involve the installation of 166,292 Photovoltaic modules (725 W) TOPCon tracker panels. The term "TOPCon" refers to "Tunnel Oxide Passivated Contact," a type of solar cell technology. N-TOPCon solar cells are made from a special silicon wafer that provides more electrons than regular silicon and are phosphorus-doped. There are two main types of solar cells: P-type and N-type. N-TOPCon cells, like those used in this Project, perform better at high temperatures and show less degradation over time compared to P-type cells. Additionally, they perform better under low light conditions.

The Tosyalı Osmaniye SPP Project, with a total installed capacity of 120.56 MWp / 88 MWe, will include a dedicated switchyard and substation facility to ensure the reliable and safe transmission of the electricity generated by the photovoltaic system into the national grid.

For the Project, 166,292 PV modules (TOPCon-725 Wp) will be utilized. The modules which will be used within the scope of the Project will be produced in Tosyalı Solar Module Factory in Osmaniye province.

According to the information provided during the Kick-Off Meeting held on 30 January 2025, the product type of the Solar Module Factory is G12 TOPCon 210×210 HCB 725 W. The module efficiency is specified as 23.2%, and the facility has an annual production capacity of 600 MW.

Associated facilities within the scope of the Project include the 1.6 km 154 kV Electricity Transmission Line (ETL). The mobilization areas, temporary construction site consisting of rest, dining and break areas for workers, social facilities, offices, and other support units are considered as ancillary facilities. Those facilities will be within the Project's allocated parcel. There will be no worker accommodation within the Project area. Current information regarding accommodation is presented in Section 5.12.7 Accommodation Management of ESIA.

The length of the ETL will be 1.6 km input and output (3.2 km in total). Apart from the removal of an existing high-voltage pylon on the current 154 kV İközler Transformer Center (TC) – Osmaniye OIZ TC transmission line and the installation of two new pylons to accommodate the input and output connections, the Project's ETL will include a total of 12 new pylons—6 located to the south and 6 to the north.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 13 / 123

The Project design of the ETL route has been completed and Project Approval was secured on 08.04.2025 by Ministry of Energy and Natural Resources, Turkish Electricity Transmission Company (TEİAŞ) Transmission Lines Installation Department.

ETL of the Project is out of scope of the national EIA regulation, and the official letter of "EIA Out of Scope" was obtained on 21.04.2025 for the ETL.

For the construction of the transmission lines required by Tosyalı, a contractor company has been engaged. Although the process is formally managed by TEİAŞ, Tosyalı maintains limited oversight over the progress and implementation. Therefore, the ETL will be considered as an associated facility in relation to the main project.

Mast Enerji ve Teknolojileri A.Ş. (Mast) responsible for the construction (foundation excavation, lower and upper installation, conductor pulling) of the ETL of the Project. However, the specific ETL route was typically not finalized at the time of this agreement and evolved during the permitting and design process. This iterative optimization process ensures continuous refinement for technical and environmental suitability, while fostering transparency with stakeholders.

Total area for ETL line is given in Table 1.

**Table 1. Osmaniye ETL Expropriation Area**

	<b>Erzin Municipality</b>	<b>Osmaniye Toprakkale District</b>	<b>Total ETL</b>
<b>Pylon Area</b>	841.08 m <sup>2</sup>	2,507.93 m <sup>2</sup>	3,349 m <sup>2</sup>
<b>Expropriation Area</b>	841.08 m <sup>2</sup>	2,507.93 m <sup>2</sup>	3,349 m <sup>2</sup>
<b>Easement Area (for pasture lands)</b>	5,363.28 m <sup>2</sup>	88,663.21 m <sup>2</sup>	94,026.49 m <sup>2</sup>
<b>Number of Poles</b>	2	12	14
<b>Clearance Area (Easement + Pole)</b>	6,204.36 m <sup>2</sup>	91,171.14 m <sup>2</sup>	97,790.21 m <sup>2</sup>

Given that TEİAŞ has formally granted land use rights to Tosyalı under easement rights for the ETL corridor, temporary access routes required for construction are considered to fall within the scope of this permission framework and therefore do not trigger any additional land acquisition actions. The existing easement rights already cover the access and usage requirements necessary for the construction and operation of the ETL. Accordingly, the temporary use of public lands such as pasture or treasury land does not require separate expropriation or permitting procedures. While temporary access across privately owned or cultivated land could, in principle, necessitate additional permits or compensation arrangements, such circumstances are not anticipated. Therefore, preparation of a RAP/LRP or a RAP/LRP addendum for ETL-related land acquisition is not required. In the area where the Osmaniye ETL line is currently under development, existing service and maintenance routes of the current ETL network will be prioritized for access. If new access routes are needed, temporary roads will be opened within the ETL corridor and levelled or smoothed only as required for safe vehicle access; no grading or permanent alterations will be undertaken. Following the completion of tower erection and conductor installation works, all temporary access areas will be restored to their original condition and left to return to their natural state.

STAKEHOLDER ENGAGEMENT PLAN		CNR-PLN-TOS-OSM-SEP-001
Final	Date: January 2026	Page 14 / 123

The Project parties are listed below:

Project Owner: Tosyalı Demir Çelik Sanayi Anonim Şirketi (Tosyalı)

- Engineering, Procurement and Construction (EPC): İnojen Enerji Teknolojileri ve Yatırımları Anonim Şirketi (İnojen) responsible for engineering, procurement and construction until the end of the construction phase.
- Turkish Electricity Transmission Company (TEİAŞ): A state-owned company manages electricity transmission, including planning and establishing new facilities. TEİAŞ assumes ownership and operational control from the transmission system's connection point. If a facility connects through another facility's switchyard, TEİAŞ retains authority over the connected feeder but may delegate its operation and maintenance to the relevant facility for a fee.
- Subcontractor for the Energy Transmission Line (ETL): Mast Enerji ve Teknolojileri A.Ş. (Mast) responsible for the construction of the ETL under İnojen, the main contractor of the Project.
- Subcontractor for land leveling and excavation: Kocabey Hafriyat Nak. ve İnş. Taah. Tic. Ltd. Şti. (Kocabey) responsible for the land leveling and excavation under İnojen, the main contractor of the Project.

The Project location map is given in Figure 1, a satellite image is given in Figure 2 (please refer to also ESIA Section 2.2 and Section 5.9).

No formal or informal land users, including Yörüks, have been identified in the ETL area. Therefore, Project activities in this area are not expected to have any direct impact on either the Yörüks or other PAPs in the region. Nevertheless, measures will be implemented to ensure that Yörük families and the local community are not prevented from carrying out activities in these areas in the future. These measures can be listed as;

- Use the same designated Project access road as the main entry point for the ETL to minimize land disturbance.
- Plan and construct only temporary service roads, avoiding permanent alterations to pastureland for the ETL.
- Rehabilitate and restore pasture areas after construction activities are completed for the ETL.
- Provide safe crossings or controlled passage for community members, especially Yörüks, during periods of heavy vehicle movement for the ETL construction.

As a result, there is no additional physical or economic resettlement impact associated with land use for the ETL, and the Livelihood Restoration Plan does not cover ETL areas.

Impacts associated with the ETL were considered during the process of identifying vulnerable groups; however, as previously noted, no impacts are expected on any specific community.

If formal or informal use is identified, it will be addressed within the scope of the LRP as Resettlement Action Plan (RAP)/LRP or RAP/LRP addendum. The LRP to be implemented at the Project site will be extended to cover the ETL within RAP/LRP or RAP/LRP addendum.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 15 / 123

## 1.2 Scope and Objectives of SEP

The overarching goal of this SEP is to establish a comprehensive program for engaging stakeholders, encompassing public information disclosure regarding the project and its potential environmental and social risks and adverse impacts and consultation throughout the entire project life cycle. The SEP delineates the strategies through which the project team will communicate with stakeholders and incorporates a mechanism for individuals to express concerns, provide feedback, or register complaints related to project activities.

The primary objective of the SEP is to ensure a consultative process with all relevant parties, including individuals, groups, and organizations impacted by or interested in the project. It aims to maintain a continuous exchange of information between these stakeholders and project activities throughout its duration. Stakeholder engagement is pivotal in these projects as it enables stakeholders to stay informed at every stage, articulate their expectations and concerns, and establish an open communication channel with the project's investor.

The initial aspect of the SEP is meaningful consultation. A meaningful consultation;

- starts early in the project planning phase to gather initial opinions on the project proposal and guide project design.
- promotes stakeholder feedback, especially to inform project design and involve stakeholders in identifying and addressing environmental and social risks and impacts.
- continues regularly as risks and impacts emerge.
- relies on the prior disclosure and distribution of adequate, relevant, clear, unbiased, meaningful, and easily accessible information within a period that allows meaningful consultations with stakeholders. This information is presented in a culturally appropriate format, in relevant local language(s), and is understandable to stakeholders.
- takes stakeholders' concerns, questions into account, and responds to feedback.
- SEP includes the establishment of a Grievance Mechanism through which stakeholders can submit their grievances or concerns, and which will be responded to in a timely and adequate manner.
- actively supports inclusive engagement with project-affected parties.
- is devoid of external manipulation, interference, coercion, discrimination, and intimidation.
- is recorded and disclosed by the Project Owner.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 16 / 123

## 2 REGULATORY FRAMEWORK

As the financing for the Project is provided by international lenders, it must align with good international practice, including Environmental and Social (E&S) Policies, Environmental, Health and Safety (EHS) Guidelines, International Finance Corporation (IFC) Performance Standards (PSs), Equator Principles (EPs), Banco Bilbao Vizcaya Argentaria (BBVA) and Spanish Export Credit Agency (CESCE) Standards, and national Environment, Health and Safety (EHS) legislation as well as best practice documents. This section identifies the international standards applicable to the management of environmental, social, health, and safety aspects of the Project.

International financial institutions follow certain policies and procedures regarding assessment and management of environmental and social impacts of the projects to be financed. As requirements of international extent of the Project, environmental and social database and impact assessment studies will also guarantee that Project's design, construction and operation will be satisfactory for international environmental standards alongside national legislation.

### 2.1.1 National Legislation

The relevant national legislation on SEP is summarized in Table 2.

**Table 2. National Legislation Relevant to Stakeholder Engagement**

Regulation	Date	Number	Relevance
<b>The Constitution of the Republic of Türkiye</b>	09.11.1982	2709	-
Freedom of Thought and Opinion	-	Article 25	Everyone has freedom of thought and opinion, no one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions.
Freedom of Expression and Dissemination of Thought	-	Article 26	Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities.
Health, the Environment and Housing	-	Article 56	Everyone has the right to live in a healthy and balanced environment. It is the duty of the State and citizens to improve the natural environment, to protect environmental health and to prevent environmental pollution.
Conservation of Historical, Cultural and Natural Wealth	-	Article 63	The State shall ensure the protection of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.
Right of Petition	-	Article 74	Citizens and foreigner resident in Türkiye, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye (TBMM) regarding the requests and complaints concerning themselves or the public.
Law on the Commission for Equal Opportunity	24.03.2009	5840	This law stipulates the establishment of a specialized commission within TBMM of Türkiye to ensure equal opportunities between women and men in Türkiye. The main duties of the commission include monitoring the implementation of legislation related to gender equality, developing policy recommendations, preparing

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 17 / 123

Regulation	Date	Number	Relevance
between Women and Men			reports based on collected data, and promoting public awareness.
Law on the Human Rights and Equality Institution of Türkiye	06.04.2016	6701	The Law aims to protect human rights, promote equality, and combat discrimination. The law prohibits discrimination based on race, language, religion, gender, disability, and similar grounds. The Human Rights and Equality Institution of Türkiye (TİHEK) was established to enforce the law, address discrimination complaints, and raise public awareness. Complaints are free of charge, and administrative fines may be imposed for violations.
Prime Ministry Circular No. 2010/14 on Increasing Women's Employment and Promoting Equal Opportunities	24.05.2010	14	The circular aims to increase women's employment and promote equal opportunities in Türkiye. It encourages public institutions and private sector organizations to take measures supporting gender equality in the workplace and improving women's participation in the labor market.
Notification Law	19.02.1959	7201	It is the law that regulates how notifications regarding legal and administrative transactions are made. This law determines the procedures and principles of notifications, and ensures that notifications are made correctly, and on time.
Law on Right to Information	24.10.2023	4982	Adopted on October 24, 2003, the Right to Information Act regulates the right of citizens and legal entities to request information and documents from public institutions and organizations. The primary purpose of the law is to promote a democratic and transparent administration by ensuring public access to information and increasing accountability in public services.
Law on Use of the Right to Petition	01.11.1984	3071	Citizens of the Turkish Republic are entitled to apply TBMM and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition No.4982 (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

## 2.1.2 International Requirements

International standards relevant to SEP are as follows:

### Equator Principles

The Equator Principles are a globally recognized risk management framework utilized by financial institutions to assess and manage E&S risks in project financing. Financial institutions that have adopted the Equator Principles require project developers and their contractors to adhere to the EPs for E&S risk management throughout the project lifecycle. These requirements encompass a broad range of issues, including labor rights, environmental protection, community health and safety, and stakeholder engagement. The Equator Principles are provided below:

- Principle 1: Review and Categorization
- Principle 2: Environmental and Social Assessment
- Principle 3: Applicable E&S Standards
- Principle 4: E&S Management System and Equator Principles Action Plan

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 18 / 123

- Principle 5: Stakeholder Engagement
- Principle 6: Grievance Mechanism
- Principle 7: Independent Review
- Principle 8: Covenants
- Principle 9: Independent Monitoring and Reporting
- Principle 10: Transparency and Reporting

### **IFC Performance Standards**

IFC has established Environmental and Social Performance Standards to define its customers' responsibilities for managing their environmental and social risks. Throughout the investment period, the borrower must comply with these standards. The IFC Performance Standards (2012) are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Conservation of Biodiversity and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

### **Banco Bilbao Vizcaya Argentaria (BBVA) Environmental and Social Standards**

BBVA supports projects that align with internationally recognized environmental and social standards. The bank's due diligence framework is grounded in compliance with the Equator Principles<sup>1</sup>, which are themselves based on the IFC Performance Standards on Environmental and Social Sustainability and the World Bank Group Environmental, Health and Safety Guidelines.

In addition to these global frameworks, BBVA has developed its own Environmental and Social Framework, including Sector Norms that define the bank's expectations for clients in high-impact industries<sup>2</sup>. These norms apply to corporate clients and project finance operations, ensuring both new and ongoing activities are aligned with BBVA's E&S risk management criteria.

### **Spanish Export Credit Agency (CESCE) Standards**

CESCE incorporates risk assessment protocols aligned with international frameworks such as the Organisation for Economic Co-operation and Development (OECD) Common Approaches and the IFC Performance Standards. These frameworks ensure that CESCE's operations promote sustainable economic growth while maintaining robust E&S safeguards.<sup>3</sup>

<sup>1</sup> BBVA. (2022). *Statement on BBVA Sector Norms*. Retrieved from: <https://www.bbva.com/en/statement-bbva-sector-norms/>

<sup>2</sup> BBVA. (2021). *BBVA tightens financing restrictions on sectors with significant environmental and social impacts*. Retrieved from: <https://www.bbva.com/en/sustainability/bbva-tightens-financing-restrictions-on-sectors-with-significant-environmental-and-social-impacts/>

<sup>3</sup> Source: CESCE, [Who we are - Cesce Spain](#)

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 19 / 123

The OECD Council Recommendation on Officially Supported Export Credits and Environmental and Social Due Diligence (Common Approaches, 2016<sup>4</sup>) provides guidelines for assessing and managing the E&S impacts of projects financed by official export credits. The OECD Common Approaches are given below:

- Screening
- Classification
- Environmental and Social Review
- Evaluation, Decision and Monitoring
- Exchange and Disclosure of Information
- Reporting and Monitoring of The Recommendation

#### **Other Applicable International Guidance**

- World Bank Group (WBG) General EHS Guidelines
- WBG EHS Guidelines: Electric Power Transmission and Distribution
- WBG EHS Guidelines: Construction and Decommissioning
- European Union (EU)
  - Best Available Techniques (BAT) Reference Document (BREF) Notes
  - European Convention for the Protection of Human Rights and Fundamental Freedoms
  - European Institute for Gender Equality (EIGE)
  - European Union Agency for Fundamental Rights (FRA)
- United Nations (UN) Guiding Principles on Business and Human Rights
  - United Nations International Covenant on Economic, Social and Cultural Rights
  - United Nations Text on Increasing Women's Employment and Promotion of Equality in Opportunities
  - United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR)
  - United Nations International Covenant on Civil and Political Rights (ICCPR)
- ILO Conventions
  - ILO Convention No. 87 Right to Organize and Collective Bargaining Convention,
  - ILO Convention No. 100 on Equal Remuneration
  - ILO Convention No. 105 Abolition of Forced Labor Convention,
  - ILO Convention No. 111 on Discrimination (Employment and Occupation)
  - ILO Convention No. 118 on Equality of Treatment (Social Security Convention)
  - ILO Employment Policy Convention No. 122
  - ILO Convention No. 138 Minimum Age and Child Labor
  - ILO Termination of Service Relationship Convention No. 158
  - ILO Convention No. 182 Worst Forms of Child Labor Convention

#### **2.1.3 Requirements of IFC's PS1 in line with Stakeholder Engagement**

IFC PS1, under "Stakeholder Analysis and Engagement Planning" (paragraphs 26–27), sets out the requirement to develop a project-specific SEP. In line with this requirement, a SEP has been prepared specifically for this Project. This SEP has also been structured to include the

<sup>4</sup> Source: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0393>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 20 / 123

documentation of engagement activities, as referenced in the same paragraphs. The relevant evidences are provided in Section 5 Stakeholder Engagement Program and included in the 9 Appendices.

IFC PS1, under the part stakeholder analysis and engagement planning, paragraph 26, highlights the identification of Affected Communities and other stakeholders, with a specific reference to the inclusion of vulnerable groups. The stakeholders specific to this Project are defined under Section 4.2. Identification of Stakeholders.

Under paragraph 25 of IFC PS1, within the requirements for Information Disclosure and Consultation, it is stated that clear and understandable information must be provided regarding project risks, impacts, and mitigation measures, and that ongoing, two-way communication must be established. For this SEP, project risks and mitigation measures have been presented in the ESIA, and stakeholders identified based on these risks are described under Section 4.2.

The Section 5 Stakeholder Engagement Program has been developed to meet the requirements of paragraph 34 of IFC PS1. In addition, Table 6 have been prepared to describe disclosure and consultation methods by project phase in a structured manner.

The requirement to provide an accessible and understandable grievance mechanism for external stakeholders is outlined in paragraph 25, and the project-specific grievance mechanism, along with the workers' grievance mechanism, is described under Section 7.

The requirements in paragraph 25 regarding ongoing engagement throughout the project lifecycle, including re-engagement as impacts change, have been addressed through sections of the SEP that commit to updates, particularly Table 6.

Paragraphs 26 and 27, which refer to monitoring the effectiveness of engagement activities and regular reporting, have been addressed in this SEP under Section 8 Monitoring and Reporting, with Table 10 providing the relevant details.

#### **2.1.4 Applicable Policies and Practices of the Project Company**

The Project Standards are established through the intersection of relevant national legislation and international standards. In instances where different criteria exist, the more stringent requirement is adopted, to ensure compliance with both national and international standards.

In this context, the Project Standards take into consideration all relevant national regulations, the IFC PSs, the EP 4, CESCE Standards, and any pertinent international agreements to which Türkiye is a signatory. These standards establish the legal framework for E&S and OHS management of the Project, ensuring the protection of workers, the environment, and the local community.

The Project Owner and all contractors engaged in the Project are required to comply with the Project Standards. The Project Owner will ensure compliance with the Project Standards, including both national legislation and international standards outlined in this chapter, through contractual obligations, inspections, and performance monitoring.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 21 / 123

### 3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

#### 3.1 National EIA Process

The purpose of the Public Information and Participation Meeting is to inform the local population living in nearby settlements that are likely to be affected by the project activities and to listen to and evaluate their opinions and views on the matter.

A public notice indicating the date, time, venue, and subject of the Public Information and Participation Meeting was published at least ten (10) calendar days prior to the meeting date in a local periodical circulated in the project area, as well as in a widely circulated national newspaper classified as a general periodical publication.

In accordance with Article 9 of the EIA Regulation, a public information and consultation meeting was held to inform the public and receive their opinions and suggestions. The meeting took place at a centrally located settlement near the project site, deemed appropriate by the Provincial Directorate of Environment, Urbanization and Climate Change in terms of proximity and population (Osmaniye Organized Industrial Zone Directorate Meeting Hall / on 24.09.2024 at 14:00<sup>5</sup>). The date, time, venue, and subject of the meeting were announced in a nationally circulated newspaper and a local newspaper published in the region, at least ten days prior to the meeting date.

The purpose of the Public Participation Meeting was to inform the local population living in nearby settlements potentially affected by the project activities and to listen to and consider their opinions and views on the matter.

During the meeting, the public was informed about the basic definition and significance of the activity, the reasons for selecting this particular location, and the environmental measures to be taken. Feedback and suggestions from participants were collected.

The primary group to be affected by the planned project will be the local residents living near the project site. The local population, who reside in the region and depend on it for their livelihood, will be the first and foremost affected stakeholders. People living in surrounding villages/neighborhoods are expected to be indirectly affected.

Participants of the meeting included:

- Officials from the Osmaniye Provincial Directorate of Environment, Urbanization and Climate Change,
- Representatives of TOSYALI DEMİR ÇELİK SAN. A.Ş. (the Investor Company),
- Representatives of EN-ÇEV Enerji Çevre Yatırımları ve Danışmanlığı Haritacılık İmar İnş. A.Ş. (the Consultant Company),
- Members of the local community.

At the Public Information and Participation Meeting, the consultant company gave a presentation providing detailed information about the planned activity. During the meeting, questions posed by local residents were answered by the project proponent. These included:

- Residents of Büyüktüysüz Neighborhood asked about the exact location of the project and its potential impacts on Büyüktüysüz.

<sup>5</sup> <http://www.toprakkale.gov.tr/kurumlar/toprakkale.gov.tr/belgeler/DUYURULAR/2024-YILI-DUYURULAR/Halkin-Bilgilendirilmesi0001.pdf>

- In response, company representatives explained that the project involves the development of a Solar Power Plant, that it would not have any negative impact on the settlement and clarified its location in relation to the neighborhood.

Participants also expressed complaints about some existing industrial facilities located in the Organized Industrial Zone but noted that they had no objections to the construction of the Solar Power Plant.

It was publicly announced by the Ministry and the Governorship—through means such as public announcements, posted notices, and internet platforms—that the application for the Project had been submitted, the EIA process had commenced, the EIA Application File had been made available for public review, and that opinions and suggestions regarding the Project could be submitted to the Governorship or the Ministry until the EIA process is concluded<sup>6</sup>

The EIA Positive Certificate was issued on 23.01.2025 under decision number 8155<sup>7</sup>.

### 3.2 Scoping Studies

A preliminary site visit and consultations was performed on November 14, 2024 during the Scoping Studies. During this visit, several Yörüks living in the region, representatives of Yolbulan-Baştuğ Vocational and Technical Anatolian High School and Osmaniye OIZ Directorate and Mukhtar of Büyüktüysüz Neighborhood were consulted. After these discussions, information has been gathered about the potential risks of the project and its potential stakeholders. The details of the interviews are given in Table 3. Besides, photographs taken during the site visit are given via Appendix 5 Photographs taken during the meeting.

**Table 3. Stakeholder consultations prior to scoping activities**

Name of Stakeholders	Identification of Stakeholders	Impact level	Type of stakeholder	Type of interviews	Date	Location
Yörüks living in vicinity of the project area	PAP	Direct	Local people	Face to face in depth interview	14.11.2024	Project area
Yolbulan-Baştuğ Vocational and Technical Anatolian High School	PAP	Direct	Local educational institution	Face to face in depth interview	14.11.2024	Nearby project area
Mukhtar of Büyüktüysüz Neighborhood	PAP	Indirect	Local representatives	Face to face in depth interview	14.11.2024	Adjacent project area
Osmaniye OIZ Directorate	OIP	-	Industrial organization	Face to face in depth interview	14.11.2024	Adjacent project area

It has been determined that Yörük families are temporarily staying around and near the project area. Families may have different travel dates, but most leave in August-September, return in November, and do livestock farming until September.

Following this, a second field visit was conducted to meet with these families and gather their opinions about the process. After the field visit conducted on the 14<sup>th</sup> of November, 2024, a follow-up field visit, on the 28<sup>th</sup> of January, 2025, was made to have detailed discussions with Yörük families identified as being in a vulnerable situation.

The details of the interviews are given in Table 4.

<sup>6</sup> <https://osmaniye.csb.gov.tr/cevresel-etki-degerlendirmesi-halkin-gorusu-karari-31.12.2024-duyuru-455131>

<sup>7</sup> <http://toprakkale.gov.tr/kurumlar/toprakkale.gov.tr/belgeler/DUYURULAR/2025-YILI/tosprojelolumlukarar.pdf>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 23 / 123

Comprehensive assessments on the subject will be presented within the Livelihood Restoration Plan (LRP). For further details, please refer to the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) documents.

A participation meeting was held on January 28, 2025, to promote the project and gather feedback and suggestions regarding the LRP (please refer to Appendix 6).

The meeting was announced by posting announcement document at the OIZ building and at public transportation stops in nearby settlements. Additionally, a poster containing details about the project's location, objectives, components, and the grievance mechanism was presented along with this announcement (please refer to Appendix 5 Photographs taken during the meeting). The meeting was attended by 3 representatives from the Yörük families, along with other household members (please refer to Appendix 5 Photographs taken during the meeting).

The most important outcome of the meeting was the Yörük's statement that, should the company provide support for their relocation and transportation, they would voluntarily leave the area where they are currently staying informally. Therefore, they have not signed any commitment or consent forms regarding leaving the land until the relocation process is completed.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 24 / 123

**Table 4. Stakeholder consultations prior to livelihood restoration activities**

Name of Stakeholders	Identification of Stakeholders	Impact level	Details of participant			Vulnerability condition	Date	Location
			Age	Gender	Household size			
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to the Law on the Protection of Personal Data (KVKK)</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 25 / 123

## 4 STAKEHOLDER IDENTIFICATION

### 4.1 Social Impact Area

When determining the social impact area of the project, two levels were taken into consideration: the primary and secondary social impact areas.

The primary social impact area includes communities located within a distance of 0–500 meters from the project area. These communities are identified as the primary social impact area because all PAPs and DVIGs within this zone are considered directly impacted by project-related activities.

The secondary social impact area comprises communities located within a corridor of 500 meters to 3 kilometers from the project area. While some PAPs and DVIGs in this area may be both directly and indirectly impacted by the project, the majority are considered to experience indirect impacts.

In defining the Area of Influence (Aoi) for the Project, a distance of 3 kilometers from the project area will be considered to include sensitive receptors and nearby settlements. The ESIA studies will cover at least the Aoi, ensuring that the study area is sufficiently comprehensive to address all environmental and social components.

As a summary;

- 1st Social Impact Area, 0-500 m, Primary Social Impact Area, Direct impacts of the Project: Center of the social impact area is the Project components. Project employees, Yörüks, and high school are at the very core of this impact area. Additionally, this social impact area also includes the settlements around the Project area, which are located within the 500 m corridor.
- 2nd Social Impact Area, 500 m -3 km buffer, Secondary Social Impact Area, Indirect impacts of the Project. This social impact area includes the settlements within the Aoi,

The map illustrates the area of social impact is given with Figure 1.

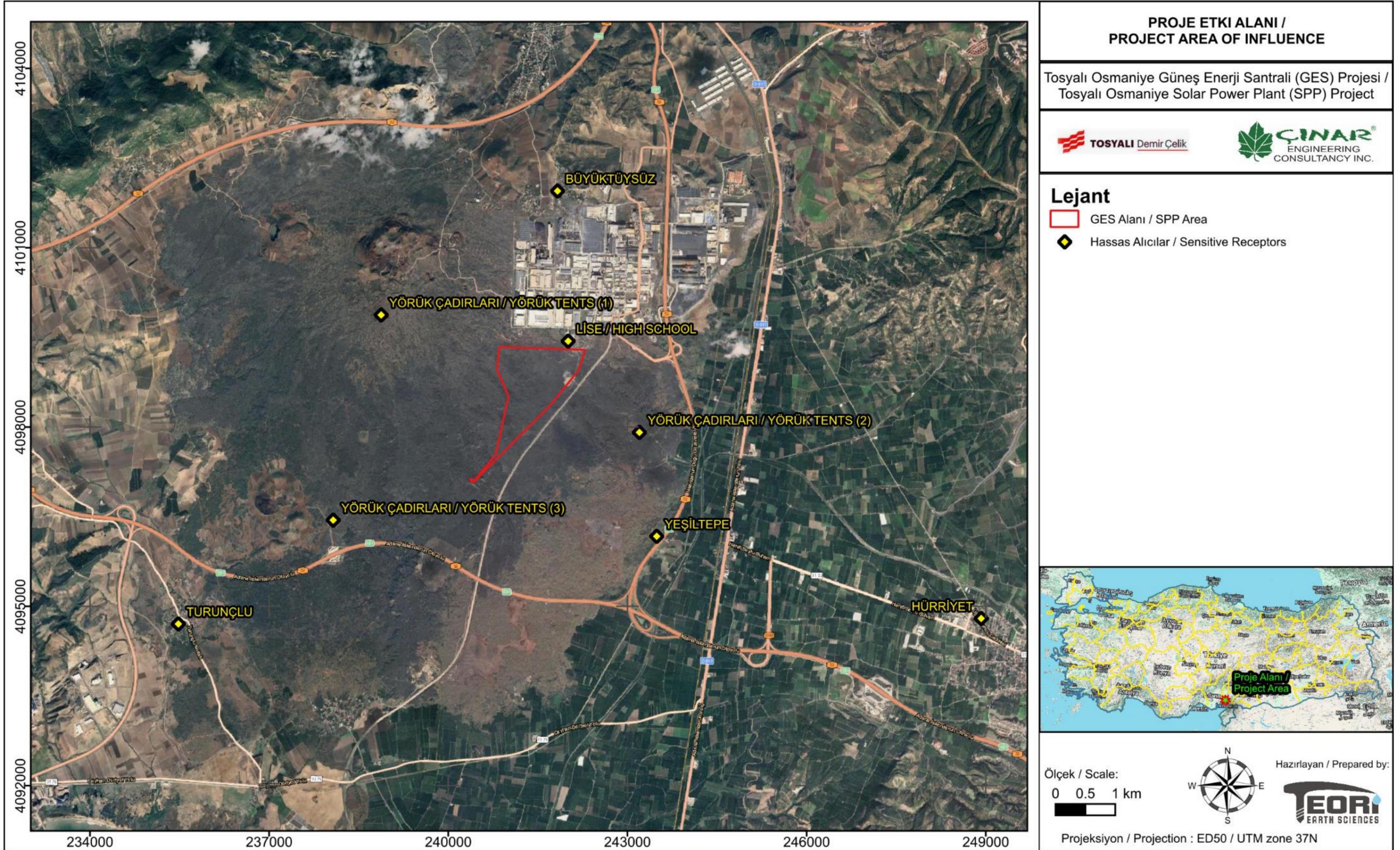


Figure 1: Social Impact Area of the Project

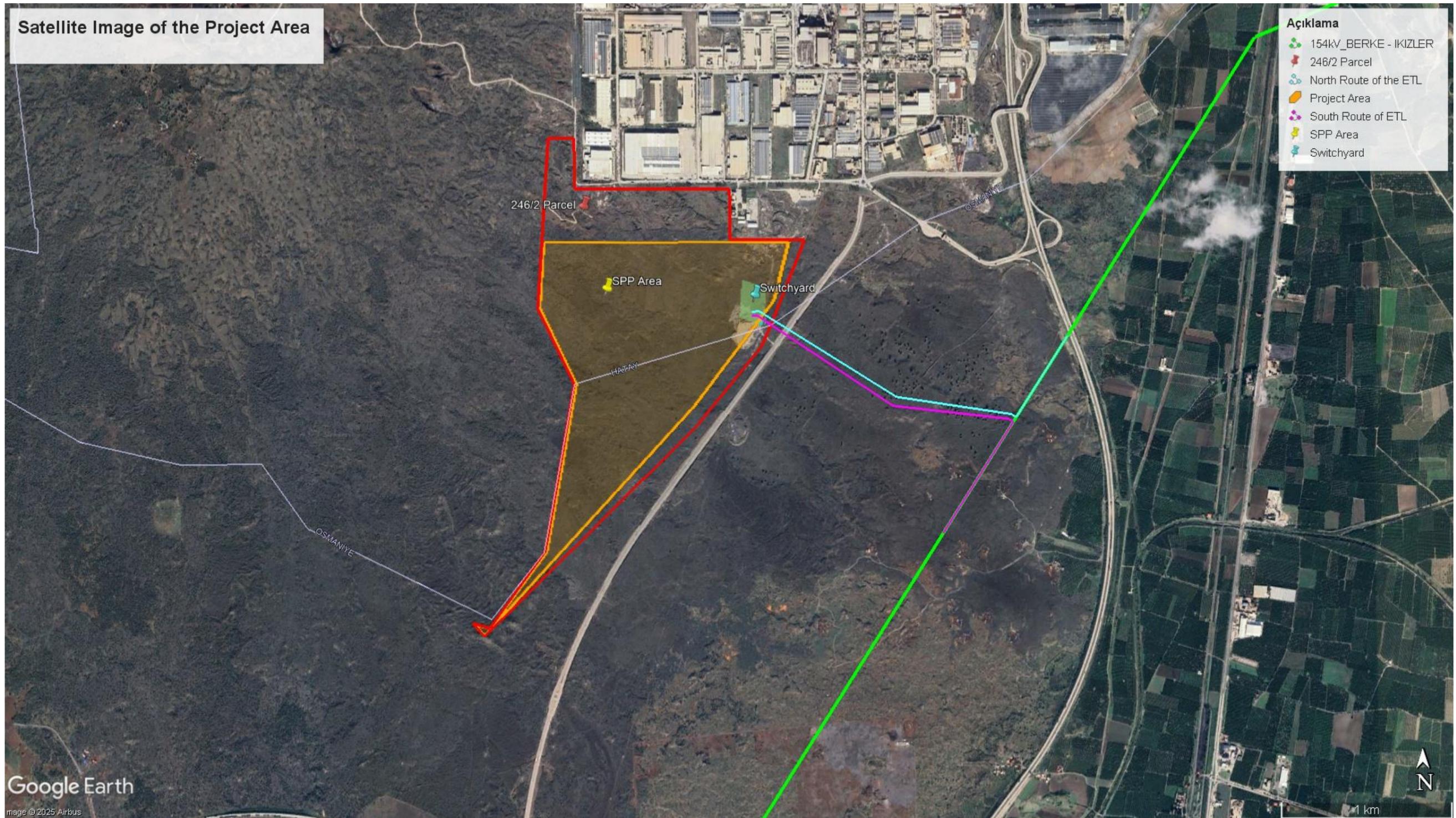


Figure 2: Satellite Image of the Project Area and ETL to be constructed

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 28 / 123

## 4.2 Identification of Stakeholders

In the context of IFC, the Stakeholder Identification process is primarily guided by the IFC Performance Standards on Environmental and Social Sustainability, particularly Performance Standard 1 (PS1).

PS1 addresses stakeholder engagement and specifically covers the identification of stakeholders, planning of engagement processes, and management of stakeholder interactions. It outlines the fundamental principles and methods to be considered when identifying stakeholders.

Additionally, the IFC's "Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets" serves as an essential resource during stakeholder identification. This handbook provides guidance on how to identify stakeholders, develop engagement strategies, and implement good practices.

According to PS1, affected parties may include:

**Project-Affected Communities (or Project affected parties (PAP)):** Local communities that are subject to risks or adverse impacts on their environment, health, livelihoods, or socio-economic conditions as a result of project activities.

**Disadvantaged or Vulnerable Groups (Disadvantaged/Vulnerable Individuals or Groups (DVIGs)):** Individuals or groups that may face particular challenges in accessing project information, participating in consultations, or benefiting from project opportunities. This may include women, children, elderly individuals, ethnic minorities, or those with disabilities.

**Other Relevant Stakeholders (or Other Interested Parties (OIP)):** These can include local authorities, non-governmental organizations (NGOs), civil society organizations, and other groups that may have an interest in the project or could be impacted indirectly.

The primary basis of the stakeholder identification strategy is the location of the project area and its associated facilities.

These areas of activity constitute the core of the social area of influence, which has been designed to identify the Project's environmental and social impacts. Within the Project's social area of influence, which is explained in detail in Social Impact Area, both quantitative and qualitative research techniques were applied to collect baseline information. The findings indicate that Yörük families and the High School are expected to have a high level of interaction with the Project.

Three Yörük family who temporarily settled in the Project area during its implementation phase have experienced both physical and economic resettlement impacts as a result of land acquisition. Land use need of ETL was also taken into consideration in line with resettlement; however, no formal or informal users were identified in that area.

The High School, located in close proximity to the Project area, is at the center of both environmental and community health impacts. The environmental impacts include dust, noise, and vibration. In order to minimize these impacts and limit potential interaction with the High School, this sensitive receptor has been classified as a vulnerable group under the SEP. Although traffic-related impacts were not explicitly raised by the High School, the High School will remain a focal point for information disclosure activities under the CHS framework, and will be addressed as a DVIG.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 29 / 123

The settlements located around the Project site and the ETL have been assessed in terms of both residential areas and sources of livelihood. Accordingly, due to the proximity of settlements as well as agricultural and livestock activities, all local residents and local authorities within “1st Social Impact Area, 0-500 m, Primary Social Impact Area” have been classified as PAPs expected to be directly affected by the Project impacts. Similarly, settlements within “2nd Social Impact Area, 500 m -3 km buffer, Secondary Social Impact Area” have been considered as PAPs expected to be indirectly affected by the Project impacts, again based on their proximity to residential areas and agricultural-livestock activities.

Within both 1st and 2nd social impact area, vulnerable groups anticipated to experience greater levels of impact from the Project, as well as groups with potentially lower participation in Project information disclosure activities, have been categorized as DVIG. Further details on this assessment are provided in Disadvantaged/Vulnerable Individuals or Groups (DVIG), and Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups.

All groups that may have an interest in the Project due to its environmental and social impacts have been considered under the OIP category. These include public institutions, local government bodies, organizations related to agriculture and livestock, cooperatives, NGOs, women’s groups, representatives of other potentially culturally sensitive or disadvantaged groups, as well as local media outlets and other relevant stakeholders.

The stakeholders who need to be prioritised over the life of the SPP may change based on the comparison of their level of interest with their level of impact. Therefore, the Project Company should conduct detailed stakeholder analysis throughout the life cycle of the Osmaniye SPP to identify stakeholders who can best assist with and facilitate the Project.

Full stakeholder list is given via Appendix 4 List of stakeholders.

#### **4.3 Disadvantaged/Vulnerable Individuals or Groups (DVIG)**

This project defines vulnerable groups based on characteristics that might limit their access to project-related information, participation in consultations, and access to announcements. Consequently, non-Turkish-speaking individuals, the elderly, and people with disabilities are identified as vulnerable groups for this project.

The identified vulnerabilities are given in alphabetical order;

- Disabled people
- Earthquake victims
- Elderly people
- Female household heads
- Illiterate adults
- Non-Turkish speaker people
- Refugees, and/or asylum seekers
- Vocational high school students, teachers and other staff providing access via pedestrian and public transportation
- Yörüks

Although all these groups are considered as DVIGs within the scope of the project, the Yörüks are recognized as the main group due to the impact of the physical and economic resettlement. Detailed evaluation of Yörüks is illustrated within the ESIA report, and LRP, too.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 30 / 123

The other significant groups are the students, teacher, and other staff of the High School (Yolbulan - Bařtuę Vocational and Technical Anatolian High School<sup>8</sup>). Due to the extremely close distance of the High School to the Project area forced to evaluation of the members of the High School among vulnerable groups.

The section Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups has been prepared specifically for both Yörüks, and the High School.

Full stakeholder list is given via Appendix 4 List of stakeholders.

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<sup>8</sup> <https://yolbulanbastugmeslis.meb.k12.tr/tema/index.php>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 31 / 123

## 5 STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1 Proposed Strategy for Information Disclosure

This strategy encompasses the details of what information will be disclosed, the formats in which it will be presented, and the methods used to communicate this information to different stakeholder groups (see Table 6).

The information to be shared with stakeholders on a priority basis relates to the Project's risks and impacts. This information should be communicated to all stakeholders prior to the commencement of Project activities. For example, informative brochures and posters can be used as tools at this stage to facilitate the dissemination of key information. Some of the documents prepared for this step are provided in Appendix 8 Stakeholder Engagement Activities Undertaken by Tosyalı for the Tosyalı SPP Project.

Due to the land acquisition impacts of the Project, priority for information disclosure activities was given to the Yörük families. The first Project meeting, brochures, and other informational materials were prepared within this scope. Similar measures were applied to the school as well. A meeting was organized with the school, which is the nearest neighbor to the Project, to gather feedback regarding risks related to traffic and access roads within the context of the Project's environmental and social impacts. The school was also provided with information regarding the relocation of the Yörük families. During these activities, follow-up visits to institutions were conducted within the OOSB to implement cooperation practices. The information disclosure activities conducted to date, along with their timing, also provide guidance on the content of future activities. For any Project activity that may affect a stakeholder's well-being, consultations with that stakeholder will be conducted prior to the commencement of the activity. Project activities will only proceed once mutual agreements have been reached during these consultations and the stakeholder's well-being has been safeguarded.

Information and documents explaining the Project's risks and impacts should be published on the Project's website in both Turkish and English prior to the commencement of Project activities. Accordingly, the ESIA will be disclosed on the Project website in both Turkish and English for the duration of the Project, in line with EP4 requirements on transparency and reporting.

Tosyalı commits to disclosing online, and making available to the Financing Parties for their online disclosure, the ESIA, SEP, HRIA, CCRA, and grievance mechanism details in Turkish and English. Hard copies of the ESIA, NTS, SEP, and HRIA summary will be made available to local stakeholders in Turkish. The LRP will be disclosed in a redacted manner to avoid the disclosure of any personal information of the PAPs. During disclosure, Tosyalı will put in place a process to allow stakeholders to provide feedback via email.

The Project has a general community grievance mechanism in place, through which livelihood restoration and land acquisition-specific grievances can be addressed. The Project will update the grievance mechanism to explicitly specify that land acquisition and LRP-related grievances will be processed through the general community grievance mechanism.

Documents such as the LRP should be presented to the Yörük communities, together with other Project-related documents, before the Project becomes operational. Tosyalı commits to sharing the measures to be implemented through updates to the LRP brochure, including specific actions aligned with the Entitlement Matrix. Upon finalization and approval of the LRP,

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 32 / 123

Tosyalı will share these measures, together with the approach to and timeline for their implementation, with the affected parties.

The school administration should be informed of the relevant measures before the Project's traffic impacts are addressed. If the school provides additional feedback on the measures, these should also be considered prior to the implementation of the actions.

Similarly, stakeholders should be informed in advance about periods when the Project's dust, noise, and vibration impacts are expected to be most significant, allowing sufficient time to prepare and implement necessary mitigation measures. For the school, this preparation period may include informing students and parents, adjusting class schedules, and other relevant arrangements.

For Project activities that may affect public services in the area, local authorities should be informed. Actions related to the activity can only be taken after the information has been disseminated by the relevant public institutions and feedback has been collected. Such activities may include, for example, power outages, road closures, or water supply interruptions.

At this stage, questions and suggestions received from stakeholders will also help guide the Project's information disclosure activities. In this regard, the Project's GM and social staff are required to actively participate in the process.

Ensuring the regular dissemination of project-related risks and emergency procedures to highly vulnerable groups (Yörük families), sensitive receptors (the High School) and other external stakeholders (local residents of nearby settlements) through information meetings, awareness sessions, and communication materials.

The Project will conduct informative activities to engage local communities on emergency preparedness and response. These activities will include regular meetings with Yörüks, representatives of the High School, and local residents of nearby settlements. Awareness sessions will be conducted by distribution of brochures and information sheets, and delivering of visual materials at community gathering points, such as coffeehouse. Information shared will cover potential emergency risks, preventive measures, evacuation routes, and assembly points. Feedback and concerns raised by communities will be collected through the CLO and registered under Project-specific GM. The outputs will be integrated into the continuous improvement of the EPRP.

Details regarding which information will be shared with which stakeholders and when are provided in Table 6.

#### Proposed Strategy for Consultation

Proposed strategy for consultation involves specifying what information will be shared, the formats in which it will be presented, and the methods used to facilitate consultation with each stakeholder group (see Table 6).

Baseline findings which guide to facilitate Stakeholder Engagement Program were collected during the stakeholder consultations. All the outputs of the completed interviews are given in Appendix 7 Findings of Realized Consultations & Interviews.

Based on the findings obtained from these consultations, actions to be implemented across all stakeholder engagement activities have been identified. The concerns and requests of the Yörük families who have been critical of the Project (highly vulnerable group), as well as those

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 33 / 123

of another vulnerable group, the High School, have been elaborated to comprehensively address all PAP, OIP, and DVIG groups.

The steps defined under the SEP have been initiated, and project-specific stakeholder engagement activities are being carried out by Tosyalı. Details of these activities and the used materials for these activities are presented in Appendix 8 Stakeholder Engagement Activities Undertaken by Tosyalı for the Tosyalı SPP Project.

The strategy defines the types of information that will be shared with stakeholders during the consultation process. All the Environmental and Social (E&S) management plans will be subject to consultation and disclosure. These management plans can be listed as the following;

- Environmental and Social Impact Assessment (ESIA),
- Environmental and Social Management Plan (ESMP),
- Stakeholder Engagement Plan (SEP),
- Contractor Management Plan (CMP)
- Livelihood Restoration Plan (LRP)
- Labor Management Plan (LMP)
- Occupational Health and Safety Management Plan (OHSMP)
- Community Health, Safety and Security Management Plan (CHSSMP)
- Emergency Preparedness and Response Plan (EPRP)
- Traffic Management Plan (TMP)
- Air Quality Management Plan (AQMP)
- Waste and Wastewater Management Plan (WWMP)
- Cultural Heritage Management Plan (CHMP)
- Chance Find Procedure (CFP)
- Biodiversity Management Plan (BMP)

In the context of the Project, “Private Sector Responsibilities Under Government-Led Stakeholder Engagement” aspect of IFC Performance Standard 1 is not applicable. Stakeholder engagement is the responsibility of Project Company, and will be undertaken by the Project Company as opposed to being reliant on a national authority

There is no anticipated potentially significant adverse impacts on any other Affected Communities that would trigger the need for a process of Informed Consultation and Participation as defined in PS1 paragraph 31.

The critical parts of the ESIA related to Human Rights Impact Assessment section will be emphasized disclosure process including contractor / sub-contractor, and supply chain components. As part of ESIA disclosure, Tosyalı will consult relevant stakeholders (e.g. cultural heritage protection authorities and civil society organisations) on the results of the ESIA, in particular on the adequacy of the mitigation measures proposed.

In line with the requirements of IFC PS1 and EP4, the Osmaniye SPP is required to publicly disclose the ESIA, including information summarizing human rights and climate change risks and impacts. EP4 refers to disclosure in local language and the EP Association Implementation Note for EP4 states “Assessment Documentation should be made readily available to Affected Communities, and where relevant Other Stakeholders, in the local language and, if available it may be published in English”.

LRP will be finalised and approved, the measures in line with EP4, and approach to and timeline of their implementation will be shared with affected parties by Tosyalı. LRP will be disclosed in a redacted manner to avoid disclosure of any personal information of the PAPs.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 34 / 123

During disclosure, put in place a process to allow stakeholders to provide feedback via email. Entitlement Matrix will be included in the LRP brochure, too. Specific dates for disclosure will be determined and will be disclosed for Yörük families. Tosyalı commits to sharing the measures to be implemented through updates to the LRP brochure, including specific actions aligned with the Entitlement Matrix. Upon finalisation and approval of the LRP, Tosyalı will share these measures, together with the approach to and timeline for their implementation, with the affected parties.

As a minimum, disclose online (and make available to Financing Parties for their online disclosure) the ESIA, SEP, HRIA, and grievance mechanism details in Turkish and English; hard copies of ESIA NTS, SEP and HRIA summary will be made available to the local stakeholders in Turkish for the duration of the Project, in line with EP4 requirements on transparency and reporting.

During the ESDD process, Tosyalı provided evidences that grievance mechanism boxes have been placed in Büyüktüysüz Municipality and one of the Osmaniye SPP subcontractor's offices. Complaint forms have been disseminated in Turunçlu, Yeşiltepe, and Hürriyet, where they were located at local grocery stores and tea house announcement boards. Additionally, the Osmaniye SPP developed 2 QR codes to submit complaints electronically (for workers and local communities), which have been also shared via posters (see Appendix 8)

All the details about the prepared documents and their disclosure periods are given in Table 6.

Formats of information outlines the formats in which information will be presented to stakeholders during the consultation. This could involve public meetings, workshops, written documents, visual presentations, or online platforms, depending on the preferences and needs of the various stakeholder groups. As an example, to address concerns of the stakeholder, or to provide accurate information about the project, it is important to hold informational meetings and collaborate with local authorities.

The strategy details the methods that will be used to communicate information during the consultation. Methods may include town hall meetings, focus group discussions, surveys, online forums, and one-on-one interviews. Each method is chosen based on its effectiveness in engaging specific stakeholder groups and promoting meaningful dialogue.

## **5.2 Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups**

In terms of Project impacts, Yörüks are considered a highly sensitive group. Other vulnerable groups, as previously noted, include the High School, female household heads, elderlies, disabled people including home-bound bedridden individuals, illiterates, non-Turkish speakers, and earthquake victims.

To elaborate, each of these vulnerable groups demonstrates distinct vulnerabilities in response to specific types of potential Project impacts.

Yörüks demonstrate particular vulnerability with respect to land acquisition and livelihood sources. In addition, due to their distinct cultural characteristics, they are considered highly sensitive in relation to the impacts on their livelihoods.

The High School may be affected by project-related traffic and road safety issues, although current assessments indicate no direct intersection between project routes and school access roads. Nevertheless, effective communication with the school must be maintained when assessing community health and safety issues. Impacts such as vibration, noise, and dust

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 35 / 123

should be specifically considered for this group. Similarly, Yörüks should be taken into account due to their proximity to the Project area. The High School may also be affected by the project-related environmental impacts such as noise and dust, and these have been addressed within the relevant sections of this Report and project-specific management plans.

The classification of female-headed households as a vulnerable group reflects the limited employment opportunities available to women in the area and underscores the time-management constraints faced by female heads of households due to their multiple responsibilities. Consequently, their participation in consultation processes may be hindered, necessitating the adoption of a tailored and inclusive engagement approach.

Elderly individuals and persons with disabilities may face disadvantages in terms of participation in Project engagement activities. Additionally, when assessing impacts such as noise, dust, and vibration on the local population, these vulnerable groups should also be taken into consideration.

In terms of Project engagement activities, individuals who speak languages other than Turkish may also experience vulnerabilities related to access and participation.

In the region, earthquake-affected populations may face challenges in accessing economic resources. This situation, together with migrant workers, can create vulnerabilities regarding informal employment, uninsured work, and insecure working conditions. Accordingly, the Project's local employment processes should consider groups experiencing economic hardship, such as migrants and earthquake-affected individuals, in relation to potential exposure to inappropriate working conditions.

Provided that vulnerable groups are prioritized, it is anticipated that community health and safety issues, including road usage, vibration, noise, and dust, may affect the local population and local structures.

Yörüks and the High School have been examined in more detail under a separate section (please refer to the following sub-section as 5.3.1 and 5.3.2), and the identified DVIGs along with the proposed strategies for them are given in Table 5.

The information provided through Table 5 has also been presented in a more comprehensive manner via Table 6. Although no dedicated project-level activities have been conducted to date beyond Yörüks and the High School, both Table 5 and Table 6 have contributed relevant information for these future activities.

**Table 5. Proposed Strategy for DVIG**

Identified DVIG	Identified Barriers / Risks	Proposed strategy
Female household head	Effective participation in publicly accessible consultation	Adjustment of consultation meeting schedules to ensure the effective participation of working women
Female household head	Difficulty in accessing meetings	organizing separate consultation meetings to ensure the participation of women
Female household head	Access to local employment announcements	securing support from local authorities and disseminating announcements widely
Elderlies	Effective participation in publicly accessible consultation	organizing settlement-specific meetings in locations with a high concentration of elderly residents
Elderlies	Difficulty in accessing meetings	Provision of transportation support to facilitate access to meeting venues
Elderlies	Difficulty in accessing meetings	Organizing separate consultation meetings to ensure the participation of elderlies

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 36 / 123

Identified DVIG	Identified Barriers / Risks	Proposed strategy
Disabled people including home-bound bedridden individuals <i>Persons with physical disabilities</i>	Effective participation in publicly accessible consultation	Selecting easily accessible venues for meetings, preferably those providing facilities for persons with disabilities (e.g., ramps, elevators)
Disabled people including home-bound bedridden individuals <i>Persons with physical disabilities</i>	Difficulty in accessing meetings	Organizing dedicated consultation meetings in settlements with a high concentration of individuals with physical disabilities
Disabled people including home-bound bedridden individuals <i>Persons with visual impairments</i>	Difficulty in accessing meetings	Providing information through face-to-face consultations
Disabled people including home-bound bedridden individuals <i>Persons with visual impairments</i>	Inability to utilize visual materials presented during information sessions	Disseminating meeting information to individuals through audio recordings or similar methods
Disabled people including home-bound bedridden individuals <i>Persons with visual impairments</i>	Inability to utilize visual materials presented during information sessions	Producing and distributing key informational materials in Braille
Disabled people including home-bound bedridden individuals <i>Persons with hearing impairments</i>	Inability to access audio announcements and calls	Supporting announcements with visual materials
Disabled people including home-bound bedridden individuals <i>Persons with hearing impairments</i>	Inability to participate in information sessions conducted during meetings	Providing support from experts proficient in sign language
Disabled people including home-bound bedridden individuals <i>Home-bound bedridden individuals</i>	Difficulty in accessing meetings	Organizing home visits for home-bound bedridden individuals
Illiterates	Difficulty in understanding written informational materials	Supporting written informational materials with visual aids
Illiterates	Difficulty in understanding written informational materials	Providing additional explanations of content during face-to-face meetings
Non-Turkish speakers	Inability to comprehend documents containing critical information	Ensuring that printed informational materials are made available in additional languages in settlements where required
Non-Turkish speakers	Being excluded from oral and written information	Providing interpreters for meetings in settlements where needed
Non-Turkish speakers	Being excluded from oral and written information	Coordinating with local authorities in advance to identify and address anticipated language needs
Migrants	Tendency to engage in inappropriate or unsafe working conditions	Organizing dedicated meetings to provide information on the project's recruitment and working conditions
Earthquake victims	Access to local employment announcements	Securing support from local authorities to ensure these individuals have access to employment announcements
Earthquake victims	Tendency to engage in inappropriate or unsafe working conditions	Organizing dedicated meetings to provide information on the project's recruitment and working conditions

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 37 / 123

Identified DVIG	Identified Barriers / Risks	Proposed strategy
All DVIG	Being disproportionately affected by the project's adverse impacts, such as traffic, noise, vibration, and dust	Preparing informational materials on the project's risks that may particularly affect DVIG and the corresponding mitigation measures
All DVIG	Being disproportionately affected by the project's adverse impacts, such as traffic, noise, vibration, and dust	Separately communicating CHS measures

### 5.2.1 Yörüks

The strategy developed for the Yörüks based on these principles is formulated by the following items;

- The Yörük community is included within the scope of this LRP as one of the disadvantaged groups identified in the project area. No physical or economic resettlement impacts are expected on other groups.
- There is no local language for the Yörük people. Therefore, all information dissemination processes will be conducted in Turkish.
- The Yörük people do not require a culturally adapted approach. For their access and participation, the period when they are in the project area seasonally should be utilized. Therefore, all activities will be completed before they leave the area.
- Face-to-face meetings will be the primary method of information dissemination. Written documents need to be provided; however, there are representatives who are illiterate. Therefore, support will be provided to ensure the understanding of written documents. To maintain transparency, an illiterate representative will be accompanied by a literate household member or a literate representative from other households to assist or guide them.
- The Yörüks in the project area are in agreement on the matter. All representatives are in consensus regarding the provision of relocation support in-kind as part of the LRP. Therefore, there was no need to create separate sessions for different opinion groups to express themselves. As a result, special meetings such as focus groups will not be used during this process.
- The initial information meeting, as well as other meetings, will be held face-to-face at the Project site. All processes will be completed before the Yörük community migrates from the area. If they migrate, communication will be conducted via phone instead of face-to-face meetings. For the Yörük community, phone calls will be the most effective participation method, apart from face-to-face meetings.
- There are no individuals with disabilities among the representatives of the Yörük families in the project area. Although there are individuals with disabilities and bedridden persons in their households, their participation in the information dissemination process is not required. Therefore, special measures for individuals with disabilities will not apply to the Yörük community.
- If the Yörük families request the participation of all household members, the elderly, and those in need of care will be visited in their homes in the Toprakkale district center.
- All activities, including meetings conducted remotely via phone, will be recorded.
- The most effective communication method for the Yörüks will currently be those held face-to-face in the area where they are temporarily staying. Efforts will be made to ensure the participation of all members at the same time. In cases where this is not possible, families will be asked to provide the days and times that are suitable for them.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 38 / 123

- In all meetings, the steps to apply for the LRP will be explained.
- Feedback will be collected for the support strategy defined within the scope of the LRP. Access to this feedback will be provided to all household representatives. For illiterate individuals, the consent form will be provided with the assistance of one of the family members.
- At the meetings, the information previously provided in the posters and announcement texts (see Appendix 6 Documents related to public participation meeting , 28.01.2025) will be left as written copies. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed. The entire LRP document will be distributed to them in printed form. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed
- The Non-Technical Summary of the Project and Project specific SEP document will also be distributed in print. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed.
- Besides, the ESIA document including the human rights impact assessment section and Labor Management Plan will be submitted during the disclosure process.
- One of the copies of the mentioned printed documents also delivered to Mukhtarship offices, and common areas such as coffee houses in nearby settlements.

The Yörüks can be considered a disadvantaged group within the context of the project because several factors make them more vulnerable. Specifically, the presence of groups such as the elderly, disabled individuals, bedridden people, illiterate adults, and women who are household heads on their own within Yörük families creates a greater need for social and economic support and protection.

Besides, Yörüks are well-integrated in Turkish society, their traditional seminomadic livelihoods are highly sensitive to development activities and hold specific cultural traits, and therefore Yörüks are also considered as a highly vulnerable group.

In this regard, a meeting has been organized in which the Yörük families will also participate. It was announced that a consultation meeting would be held at point Project area on 28.01.2025, and in accordance with the announcement, the consultation meeting was held on the specified date and location. Representatives of the Yörük households, the Project Owner's representative, the OIZ director and OIZ staff, the ÇINAR social team, and some individuals who come to the area to purchase livestock from the Yörük families attended the meeting. In the meeting held for its intended purpose, the expectations of the Yörük families regarding the improvement of their livelihoods were collected by the Project owner.

The fundamental principles of livelihood restoration aim to protect and, if possible, improve the living standards of individuals who have lost their livelihoods.

During the consultations held at the consultation meeting dated 28.01.2025 it was learned that the Yörük households requested relocation support to move out of the project area and material support for the new tents they would set up at their new location. Their views and suggestions regarding possible relocation areas were gathered, and the relevant areas were visited after the meeting. Following the meeting and site visit, a suitable area was identified, and work has begun to make it livable for the Yörük families. The materials for the tents were purchased by the Project Owner and delivered to the Yörük households.

After the relocation of all the Yörük households, the Project activities will begin, and the entry of the Project Owner and its Contractor / sub-contractor into the site will be initiated.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 39 / 123

On 12 August 2025, a meeting was held at the association building in Osmaniye/Toprakkale with the presidents and vice presidents of the Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association. A total of eight participants attended the meeting, including the association leaders, their vice presidents, the ÇINAR team, and the Tosyalı team. When asked about institutions, organizations, or associations that could be consulted regarding the Yörüks, it was stated that the Yörük Türkmen Foundation (YÖKTÜRK) headquarters in Ankara does not have a direct connection with the region, whereas the Türkiye Yörük Türkmen Federation is more widely recognized locally.

During the meetings held with the Toprakkale Yörük Turkmen Association and the Osmaniye Yörük-Turkmen Association, questions were asked on issues such as the living conditions of Yörüks, the main challenges they face, the impacts of surrounding facilities, the state of cultural activities, relations with associations, and expectations for the future. The association presidents stated that the main problems faced by Yörüks living in the region include the lack of pastures and grazing lands, the non-allocation of forest areas, settlement issues, and the lack of basic infrastructure services such as water and electricity.

It was emphasized that Yörüks, who sustain their livelihoods through traditional livestock breeding, are forced to turn to alternative income sources due to the shrinking of these areas and difficulties in accessing resources. Industrial facilities operating in the region directly affect the living areas of Yörüks, which in turn causes changes in their lifestyle. It was expressed that risks may increase in areas overlapping with projects such as solar power plants; therefore, in such projects, Yörüks should be directly consulted during decision-making processes, and progress should be made without disrupting their existing way of life.

It was noted that Yörüks maintain this lifestyle under challenging conditions, and that improving their opportunities would enhance both their living standards and cultural continuity. It was further indicated that while there is communication with companies and no direct complaints have been received against them, Yörüks maintain relations with associations, follow these institutions on social media, and although there are approximately 156,000 Yörüks in Osmaniye, only 300–400 people continue the traditional lifestyle.

In addition, it was reported that each year in October, after the return from the highlands, a large-scale festival called “Yörük-Turkmen Gatherings” is organized, featuring performances by local artists, troubadours, and folk dance groups, along with the offering of traditional dishes. It was also shared that, alongside livestock breeding, weaving is still practiced by some Yörük groups.

### 5.2.2 The High School

The High School presents itself<sup>9</sup> as a model institution contributing to the development of the industrial and service sectors by training students as qualified, skilled professionals with a strong sense of entrepreneurship. According to information obtained from the official website of the High School, the school has a total of 25 classrooms, 46 teachers, and 478 students<sup>10</sup>.

Additionally, the school has a dormitory with a total capacity of 160 male students. The dormitory operates between 08:00 in the morning and 16:10 in the evening.

<sup>9</sup> [https://yolbulanbastugmeslis.meb.k12.tr/80/07/760347/okulumuz\\_hakkinda.html](https://yolbulanbastugmeslis.meb.k12.tr/80/07/760347/okulumuz_hakkinda.html)

<sup>10</sup> <https://yolbulanbastugmeslis.meb.k12.tr/tema/index.php>

STAKEHOLDER ENGAGEMENT PLAN		CNR-PLN-TOS-OSM-SEP-001
Final	Date: January 2026	Page 40 / 123

The school also has an internal Complaint Procedure in place<sup>11</sup>.

The current contact information of the High School is as follows<sup>12</sup>:

**Website:** <https://yolbulanbastugmeslis.meb.k12.tr>

**e-mail:** [https://yolbulanbastugmeslis.meb.k12.tr/tema/eposta/eposta\\_gonder.php](https://yolbulanbastugmeslis.meb.k12.tr/tema/eposta/eposta_gonder.php)

**Phone:** 03288020616

**Address:** Türkmen Beldesi Büyüktüysüz Mah. Bilinmeyen1 Sk. No 11 Toprakkale / Osmaniye

On 24 June 2025, an additional meeting was conducted at the school, focusing primarily on potential project impacts and the risks associated with road usage for students, as well as measures to mitigate these risks. The meeting was attended by the school principal and vice principals. The school has a total of 327 registered students, while Vocational Training Center hosts 137 students who attend classes one day per week and work in the Osmaniye Organized Industrial Zone during the weekdays. The number of students at the school varies each academic term; therefore, it is appropriate to consider these figures as averages.

The majority of students are aged 14–15, although Vocational Training Center also includes Syrian students over 30 years old. The boarding facility accommodates 120 students, who have study hours without formal instruction. School hours are 08:00–16:00 on weekdays, while Vocational Training Center operates 08:00–17:00 to prevent overlap with regular school activities. Approximately 180 students attend via the school bus system, served by a total of 12 buses. There are no reported traffic-related issues at the school, and no risks to student safety have been identified. Due to the school's location, there are no concerns regarding odor, noise, dust, or similar environmental factors. In fact, the Project will implement the mitigation measures for those environmental impacts on the school as given in the relevant chapters of ESIA Report as well as the Project-specific environmental and social management plans (such as Air Quality Management Plan, Noise Management Plan, Traffic Management Plan, etc.).

The determined communication strategy developed for the High School will be based on the following items;

- Communication with the school administration will be established during pre-construction phase process using the communication tools clearly and understandably presented.
- Contact must be made with the individuals in the school's management.
- In order to provide information about the Project and explain the anticipated risks and impacts during the construction phase, printed copies of the Project's NTS document, SEP document, and draft ESMP document will be delivered to them.
- A short note explaining the communication channels with the Project will be provided to the stakeholder along with the SEP document.
- To gather the views of students and parents, the head of the parent-teacher association will be included in these meetings.

<sup>11</sup>

[https://yolbulanbastugmeslis.meb.k12.tr/meb\\_iys\\_dosyalar/80/07/760347/dosyalar/2018\\_11/26212131\\_Yikayet\\_prosedYrY.pdf?CHK=1837260b4647ebd19289b406d9fb628a](https://yolbulanbastugmeslis.meb.k12.tr/meb_iys_dosyalar/80/07/760347/dosyalar/2018_11/26212131_Yikayet_prosedYrY.pdf?CHK=1837260b4647ebd19289b406d9fb628a)

<sup>12</sup> <https://yolbulanbastugmeslis.meb.k12.tr/tema/iletisim.php>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 41 / 123

- Attention will be paid as well to the stakeholders who have been identified as providing access via pedestrian and public transportation, potentially impacted by transport of personnel and materials, especially heavy machinery, along the local roads
- During this process, the CLO will actively participate in the meetings under the coordination of the E&S Team.
- Conducting all meetings face-to-face is favorable in terms of facilitating communication.
- Visual tools such as presentations and photographs may be included during meetings and consultations.
- A site visit may be organized with a school administrator representing the school management and the head of the parent-teacher association.
- Their views must also be taken into account regarding the relocation of the Yörüks to a location near the school area.
- All meetings must be documented and the records will be properly maintained.

Table 6. Stakeholder Engagement Plan

Timing	Main Topic	Management Plans	Point and Purpose of the activity	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
Pre-Construction	Yörüks	Turkish and English versions of the following documents; Livelihood Restoration Plan Stakeholder Engagement Plan Non-Technical Summary	<b>Timing</b> Prior to land entry <b>Purpose</b> Fully disclosing the project and ensuring that all grievance mechanism tools for collecting feedback are fully operational <b>Scope</b> The project's scope, risks, and mitigation measures are communicated to all stakeholders.	Yörüks	Public participation meeting Face to face interview Delivering printed copies of the Project documents Presentations Brochure, leaflet and visual documents	Support for illiterate individuals	Project area	Whenever requested	Tosyalı General Manager & Energy Director E&S Team Project Manager Social Expert & CLO
Pre-Construction	High School	Turkish and English versions of the following documents; Stakeholder Engagement Plan Non-Technical Summary Draft ESMP Draft ESIA Draft LMP Community Health and Safety risks relevant to the high school	Employees and the local community are informed, and feedback is collected and addressed through the grievance mechanism. Stakeholder feedback is collected and incorporated into the relevant plans. <b>Targeted Group(s)</b> Highly vulnerable groups (Yörüks) Sensitive receptors (the High School)	Students, teacher, and other staff of the High School	Face to face interview Delivering printed copies of the Project documents Presentations Brochure, leaflet and visual documents	Additional consultation	The High School Project area	Whenever requested	Tosyalı General Manager & Energy Director E&S Team Project Manager Social Expert & CLO
Pre-Construction	Local people	Turkish and English versions of the following documents; Stakeholder Engagement Plan Non-Technical Summary Draft ESMP	Local residents and local representatives within the 1 <sup>st</sup> social impact area Local residents and local representatives within the 2 <sup>nd</sup> social impact area OIPs including OOSB OIPs including Yörüks' NGO OIPs including governmental institutions	PAPs & OIPs Osmaniye Organized Industrial Zone (OOSB)	Public participation meeting	Additional consultation	Project area	Once	Tosyalı General Manager & Energy Director E&S Team Project Manager Social Expert & CLO
Pre-Construction	Local people	Turkish and English versions of the following documents; Stakeholder Engagement Plan Non-Technical Summary Draft ESMP Draft LMP Draft BMP		PAPs & OIPs Local people who engaged in ecosystem services Local governmental institutions related to agriculture, and husbandry	Face to face interview Focus Group Discussions Presentations Brochure, leaflet and visual documents	Additional consultation	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Continuous	Tosyalı General Manager & Energy Director E&S Team Project Manager Social Expert & CLO
Land preparation and Construction	Environmental and Social (E&S) and OHS risks and disclosure of precautions Final E&S documents	Turkish and English versions of the following Final versions of the E&S documents ESIA ESMP LRP SEP CMP LMP OHSMP CHSSMP EPRP TMP AQMP	<b>Timing</b> Immediately after land entry <b>Purpose</b> Ensuring that all final documents are published in both Turkish and English <b>Scope</b> Monitoring, auditing, and reporting on whether the steps described in the published documents are being implemented <b>Targeted Group(s)</b>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution Vulnerable group	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Bilingual document meet local language, if demanded Having an interpreter during meeting Access support for disabled people & elderly	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Annual	Tosyalı General Manager & Energy Director İnojen E&S Team Social Expert & CLO Contractor's (İnojen) CLO HSE Lead Contractor's (İnojen) HSE Contractor's (İnojen) Environmental Specialist Contractor/Subcontractors' (İnojen, Mast and Kocabey) OHS Specialists and Support Staff (HSE Team) QMS Team

Timing	Main Topic	Management Plans	Point and Purpose of the activity	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
		WWMP CHMP CFP BMP	<i>Project workforce Highly vulnerable groups (Yörüks) Sensitive receptors (the High School) Local residents and local representatives within the 1<sup>st</sup> social impact area</i>			Technical assistance for illiterates			
Land preparation and Construction	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> SEP GM	<i>Local residents and local representatives within the 2<sup>nd</sup> social impact area OIPs including OOSB OIPs including Yörüks' NGO OIPs including governmental institutions</i>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution Vulnerable group	Announcement of approved SEP	Technical assistance for illiterates	Official website	Once	Tosyalı İnojen E&S Team Social Expert & CLO Contractor's (İnojen) CLO
Land preparation and Construction	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> SEP GM		PAPs Project workers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents QR code application designed for the Project	Not applicable	Construction area	Monthly	Worker representative(s) of İnojen
Land preparation and Construction	Discrimination and harassment SEA / SH GBV	<i>Turkish and English versions of the following documents;</i> ESIA and SEP LMP ESMP CMP		PAPs Project workers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Not applicable	Worker accommodation area / camp site, if available Construction area	Annual	Tosyalı Project Manager İnojen E&S Team Social Expert & CLO Contractor's (İnojen) CLO
Operation	E&S and OHS risks and disclosure of precautions Draft and final E&S documents.	<i>Turkish and English versions of the following documents;</i> ESIA LMP SEP ESMP CHSSMP EPRP TMP WWMP	<b>Timing</b> <i>In the final year of construction, prior to operation</i>  <b>Purpose</b> <i>Updating all documents used during the land preparation and construction for the operational phase and incorporating stakeholder feedback into these documents</i>  <b>Scope</b> <i>Monitoring, auditing, and reporting on whether the steps described in the published documents are being implemented</i>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution Vulnerable group	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents QR code application designed for the Project	Having an interpreter during meeting  Access support for disabled people & elderly	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Annual	Tosyalı Project Manager / (O&M Manager for the operation phase) E&S Team HSE Lead QMS Team
Operation	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> SEP	<b>Targeted Group(s)</b> <i>Project workforce Highly vulnerable groups (Yörüks) Sensitive receptors (the High School)</i>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution Vulnerable group	Announcement of revised SEP, if required	Technical assistance for illiterates, and elderly	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Once	Tosyalı

Timing	Main Topic	Management Plans	Point and Purpose of the activity	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
Operation	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> ESIA SEP LMP ESMP		PAPs	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents QR code application designed for the Project	Not applicable	Worker accommodation area / camp site, if available Construction area	Semi annual	Worker representative(s) of Tosyalı
Operation	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> ESIA SEP LMP		PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution <b>Vulnerable group</b> Yörüks Vocational high school students providing access via pedestrian and public transportation Non-Turkish speaker people Illiterate adults Disabled people Elderly people Female household heads Refugees, and/or asylum seekers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents QR code application designed for the Project	Technical assistance for illiterates	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Annual	Tosyalı
Decommissioning	Environmental and Social (E&S) and OHS risks and disclosure of precautions Draft and final E&S documents.	<i>Turkish and English versions of Final versions of the E&amp;S documents</i>  ESIA ESMP SEP CMP LMP OHSMP CHSSMP EPRP TMP AQMP WWMP CHMP CFP BMP LRP	<b>Timing</b> <i>In the final year of operation, prior to decommissioning</i>  <b>Purpose</b> <i>Updating all documents used during the operation for the decommissioning phase and incorporating stakeholder feedback into these documents</i>  <b>Scope</b> <i>Monitoring, auditing, and reporting on whether the steps described in the published documents are being implemented</i>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution <b>Vulnerable group</b> Yörüks Vocational high school students providing access via pedestrian and public transportation Non-Turkish speaker people Illiterate adults Disabled people Elderly people Female household heads Refugees, and/or asylum seekers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Bilingual document meet local language  Having an interpreter during meeting  Access support for disabled people & elderly  Technical assistance for illiterates	Büyüktüysüz neighborhood of Toprakkale district Turunçlu neighborhood of Erzin district Hürriyet neighborhood Erzin district Yeşiltepe neighborhood Erzin district	Annual	Tosyalı Contractor
Decommissioning	Grievance mechanism	<i>Turkish and English versions of the following documents;</i> Final version of SEP including outputs of public consultations	<i>Local residents and local representatives within the 1<sup>st</sup> social impact area</i>  <i>Local residents and local representatives within the 2<sup>nd</sup> social impact area</i>	PAPs, OIPs, DVIG Local residents and local representatives Local and regional governmental institution <b>Vulnerable group</b>	Announcement of approved SEP	Technical assistance for illiterates	Official website	Once	Tosyalı Contractor

Timing	Main Topic	Management Plans	Point and Purpose of the activity	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
			<i>OIPs including OOSB OIPs including Yörüks' NGO OIPs including governmental institutions</i>	Yörüks Vocational high school students providing access via pedestrian and public transportation Non-Turkish speaker people Illiterate adults Disabled people Elderly people Female household heads Refugees, and/or asylum seekers					
Decommissioning	Grievance mechanism	<i>Turkish and English versions of the Final versions of the E&amp;S documents (see 5.2 Proposed Strategy for Consultation)</i>		PAPs,	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents QR code application designed for the Project	Not applicable	Worker accommodation area / camp site, if available Construction area	Weekly	Worker representatives of Contractor
Decommissioning	Discrimination and harassment SEA / SH GBV	<i>Turkish and English versions of Final version of SEP including outputs of public consultations LMP ESMP CMP</i>		<u>PAPs</u> Project workers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Not applicable	Worker accommodation area / camp site, if available Construction area	Annual	Contractor's social staff

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 46 / 123

## 6 RESOURCES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 6.1 Implementation Arrangements

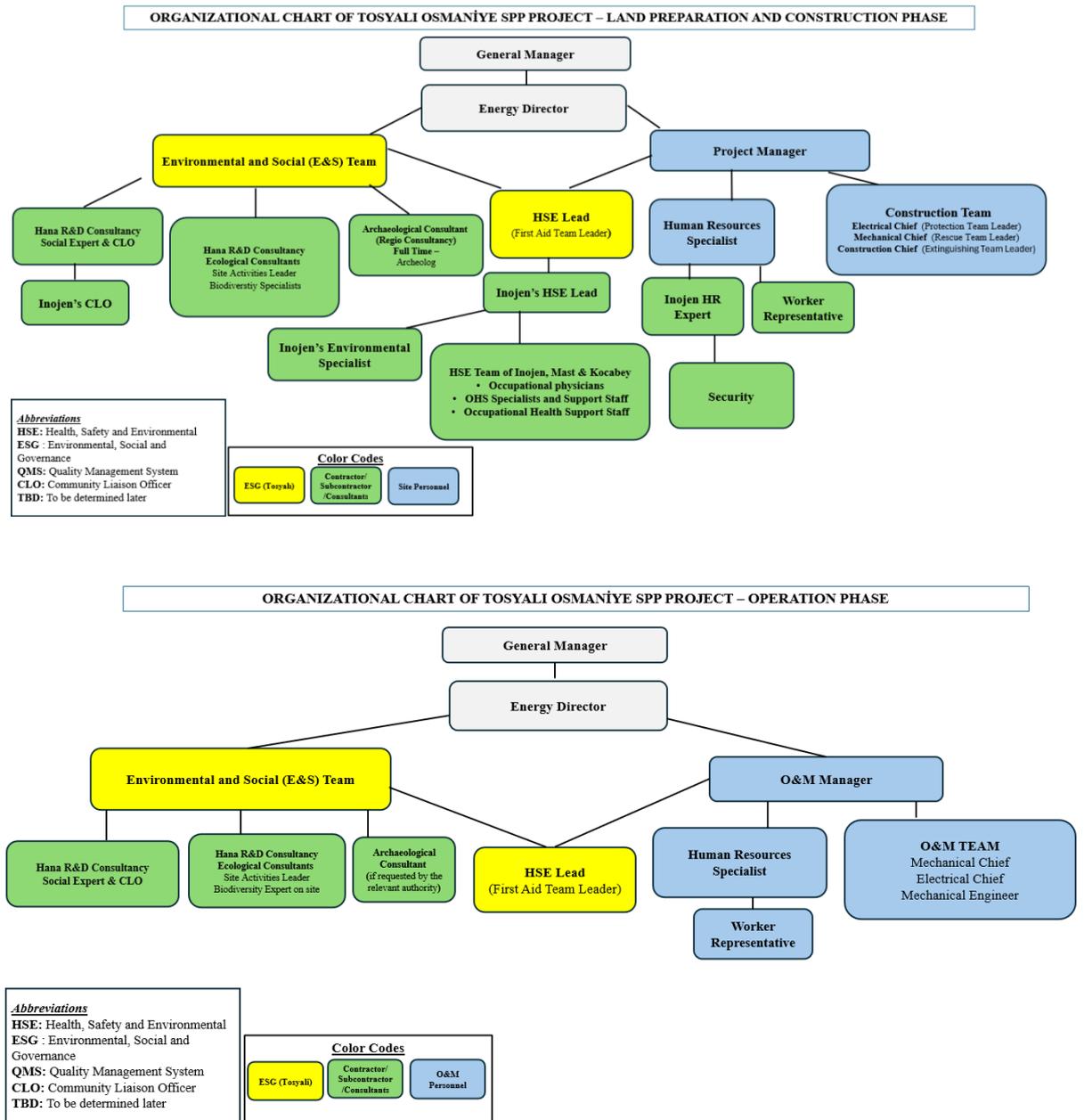
The expenditures associated with the SEP activities will be financed using the budget provided by the institution referred to as Tosyalı. The responsibilities linked to SEP, and the necessary funds for these tasks, will be sourced from the budgets allocated by Tosyalı for this specific purpose. The methods for information and disclosure encompass various channels both in print and online, as well as consultation meetings. These may include materials such as:

- Brochures, posters, flyers, etc., containing current information about the project, contractor/subcontractors, and facility in the form of introductory documents with informative short notes.
- The official website of the Project, where relevant documents are accessible online.
- Up-to-date announcements on the official website of the project.
- Current announcements on the Project's social media accounts.
- Bulletin boards placed inside and around the facility with warnings and information notes on occupational and environmental health, safety, security, and waste management.
- Request, complaint, and suggestion boxes located in and around the facility.
- Regular collaboration and consultation meetings with stakeholders on occupational and environmental health, safety, and waste management.
- Regular consultation meetings held with local and regional institutions and organizations.
- Collaboration and consultation meetings with relevant local and regional institutions for employment.
- In-depth interviews and discussions.
- Focus group meetings.
- Information and collaboration meetings covering the supply chain and potential buyers.

### 6.2 Roles and Responsibilities

The general organizational chart of the Project is given in Figure 3, and overall, they will be responsible for the appropriate implementation of ESIA Report, ESMP and other relevant sub-management plans as per the requirements of IFC PSs to ensure the fully performance compliance of the Project.

These roles and responsibilities also defined under the Project-specific Grievance Mechanism Procedure (Please refer to REQUEST / COMPLAINT / SUGGESTION MANAGEMENT SYSTEM PROCEDURE Doc No: P.01.07.02. dated 03.09.2025). Tosyalı commits to ensuring that this procedure is aligned with the scope of the SEP and is revised in line with any updates to the content of the SEP.



**Figure 3. Organizational Structure of the Project Owner**

The roles identified within the Project Owner and responsible for the implementation, monitoring and recording of the ESMP and related sub-management plans and procedures are outlined in Table 7.

**Table 7. General Roles and Responsibilities for the Implementation of the ESMP**

Roles	Responsibilities
<b>General Manager &amp; Energy Director</b>	<ul style="list-style-type: none"> <li>• Making strategic decisions regarding E&amp;S and OHS management and ensuring the implementation of the Project documents including the ESMP.</li> <li>• Ensuring that the Project is executed in accordance with the Project Standards, ESIA commitments, ESMP, SEP and other sub-management plans and procedures, and contractual obligations.</li> </ul>

Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Oversee contractor performance and ensure that all contracted entities adhere to the required environmental, social, and health &amp; safety (EHS) standards.</li> <li>Guaranteeing the provision of necessary financial, technical, and operational resources for effective E&amp;S and OHS management.</li> <li>Approve high-level corrective actions for non-compliances identified in E&amp;S and OHS management.</li> </ul>
<b>Project Manager</b> (O&M Manager for the operation phase)	<ul style="list-style-type: none"> <li>Oversee the HSE and social management and QMS performance of the Project.</li> <li>Monitor and evaluate E&amp;S and OHS compliance with project timelines, budgets and quality standards.</li> <li>Ensure effective coordination between different teams (environmental, social, OHS, and contractors/subcontractors) for compliance with the Project Standards.</li> <li>Supervise the overall E&amp;S and OHS performance.</li> <li>Ensure that E&amp;S and OHS risks, challenges, and corrective actions are reported to the Board of Directors.</li> <li>Oversee the implementation of corrective measures and enforce compliance with contractual requirements.</li> <li>Facilitate regular audits and inspections to verify contractor adherence to contractual and regulatory requirements.</li> <li>Act as the primary point of escalation for major E&amp;S and OHS issues and disputes.</li> </ul>
<b>Environmental and Social (E&amp;S) Team</b>	<ul style="list-style-type: none"> <li>Consists of an E&amp;S Chief and an E&amp;S Expert, with responsibilities shared between the two roles through task-based allocation and mutual review, rather than strict role separation.</li> <li>Oversee compliance with E&amp;S and OHS requirements outlined in the Project Standards and relevant management plans.</li> <li>Implement and monitor the ESMP to ensure contractors'/subcontractors adherence to environmental and social commitments.</li> <li>Conduct regular inspections and audits to identify non-compliances and ensure corrective actions are taken.</li> <li>Manage stakeholder engagement and community relations related to E&amp;S management, including contractor/subcontractors' activities.</li> <li>Oversee the implementation of grievance mechanisms for E&amp;S concerns.</li> <li>Provide technical guidance on environmental protection measures and regulatory requirements.</li> <li>Review and approve the management plans covering environmental, social, and occupational health and safety issues, prepared by the Contractor—primarily the Contractor's Environmental and Social Management Plan (C-ESMP)—based on the ESIA Report.</li> <li>Review all environmental, social, health and safety performance data, reports, and recommendations for continuous improvement delivered by HSE Lead and Social Expert and CLO.</li> <li>Ensure that emergency response plans related to environmental and social risks are in place and tested regularly.</li> <li>Monitor and ensure contractors'/subcontractors' compliance with labor rights, human rights, and workplace safety in alignment with the Project Standards.</li> </ul>
<b>Health, Safety and Environment (HSE) Lead</b>	<ul style="list-style-type: none"> <li>Implement and monitor the ESMP to ensure contractors'/subcontractors' adherence to environmental and social commitments.</li> <li>Conduct regular inspections and audits to identify non-compliances and ensure corrective actions are taken.</li> <li>Assist all HSE-related issues on-site and report to E&amp;S Team.</li> <li>Ensure coordination between contractors, subcontractors, regulatory bodies, and internal teams to maintain compliance with national and international HSE standards.</li> <li>Develop and deliver training programs for the Project personnel, including contractors/subcontractors, on HSE best practices, including pollution prevention, biodiversity conservation, and community engagement.</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 49 / 123

Roles	Responsibilities
<b>Social Expert &amp; CLO</b>	<ul style="list-style-type: none"> <li>• Analyze HSE performance data, prepare reports, and provide recommendations for continuous improvement to E&amp;S Team.</li> <li>• Ensure that contractors/subcontractors comply with social requirements outlined in the ESMP, SEP and other sub-management plans and other relevant documents.</li> <li>• Manage Project-related social issues, including stakeholder engagement, community relations, and social risk mitigation.</li> <li>• Oversee the implementation of the grievance mechanism for Project-related concerns and ensure timely resolution.</li> <li>• Conduct social assessments and monitor contractor/subcontractors' activities to identify and address potential social risks.</li> <li>• Develop and implement training programs for contractors/subcontractors on social responsibility, community engagement, and cultural sensitivity together with the İnojen's CLO.</li> <li>• Analyze social performance data, prepare reports, and provide recommendations for continuous improvement to E&amp;S Team.</li> <li>• Ensure the effective implementation of social risk assessments and the development of mitigation plans for identified social risks.</li> <li>• Facilitate dialogue between contractors/subcontractors and local communities to address concerns and improve relations together with İnojen's CLO.</li> <li>• Ensure compliance with international standards on human rights, gender equality, and labor rights in all Project activities.</li> <li>• Monitor and report on Project's adherence to non-discrimination policies and ensure inclusiveness in stakeholder engagement.</li> </ul>
<b>Contractor's (İnojen) CLO</b>	<ul style="list-style-type: none"> <li>• Assist Social Expert and CLO regarding implementation of ESMP, SEP and other related plans and procedures.</li> <li>• Report to Social Expert and CLO regarding the contractor-related social issues, grievances, actions taken, etc.</li> <li>• Ensure contractor/subcontractor personnel comply with the social requirements specified in the ESMP, SEP and other social plans and procedures.</li> <li>• Manage contractor-related social issues, including stakeholder engagement, community relations, and social risk mitigation.</li> <li>• Oversee the implementation of the grievance mechanism for Contractor-related concerns and ensure timely resolution.</li> <li>• Monitor and report on contractor/subcontractors' activities to ensure compliance with Project Standards.</li> <li>• Ensure compliance with international standards on human rights, gender equality, and labor rights in all contractor/subcontractors' activities.</li> <li>• Monitor and report on contractor/subcontractors' adherence to non-discrimination policies and ensure inclusiveness in stakeholder engagement.</li> <li>• Participate in contractor-related social inspections and audits.</li> <li>• Record and report non-conformities or violations of social requirements.</li> <li>• Assist in implementing corrective actions for identified non-compliances.</li> <li>• Identify and report non-compliance or violations of social requirements</li> <li>• Oversee day-to-day contractor/subcontractors' compliance with social obligations.</li> <li>• Ensure that records and documents related to social performance and compliance with Project Standards are kept up to date.</li> </ul>
<b>Contractor's (İnojen) HSE Lead</b>	<ul style="list-style-type: none"> <li>• Ensure compliance with HSE requirements on-site, including the implementation of safety measures.</li> <li>• Conduct HSE risk assessments and enforce corrective actions related to contractor/subcontractors' operations.</li> <li>• Provide HSE training and awareness to contractor/subcontractors' personnel.</li> <li>• Monitor workplace conditions and report HSE incidents and near misses.</li> <li>• Ensure that contractor/ subcontractors' workplaces adhere to all relevant HSE regulations and standards.</li> </ul>

Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Oversee day-to-day contractor/subcontractors' compliance with HSE obligations.</li> <li>Ensure that records and documents related to HSE performance and compliance with Project Standards are kept up to date.</li> <li>Monitor and report on contractor/subcontractors' activities to ensure compliance with Project Standards.</li> <li>Participate in contractor-related inspections and audits.</li> <li>Record and report non-conformities or violations of HSE requirements.</li> <li>Assist in implementing corrective actions for identified non-compliances.</li> <li>Identify and report non-compliance or violations of HSE requirements</li> </ul>
<b>Contractor's (İnojen) Environmental Specialist</b>	<ul style="list-style-type: none"> <li>Ensure that contractors and subcontractors comply with environmental management procedures.</li> <li>Implement the ESMP and other environmental-related management plans.</li> <li>Ensure the implementation of mitigation measures given in the management plans.</li> <li>Conduct monitoring to ensure compliance with environmental management standards and identify/report non-conformities to İnojen's HSE Lead.</li> <li>Implement corrective actions for identified non-compliances.</li> <li>Coordinate environmental management efforts.</li> <li>Prepare management compliance reports and submit to İnojen's HSE Lead.</li> </ul>
<b>Contractor/Subcontractors' (İnojen, Mast and Kocabey) OHS Specialists and Support Staff (HSE Team)</b>	<ul style="list-style-type: none"> <li>Oversee contractor/subcontractors' compliance with OHS standards and requirements.</li> <li>Conduct workplace inspections and risk assessments to ensure contractors/subcontractors adhere to OHS procedures.</li> <li>Ensure that contractors/subcontractors provide adequate OHS training to their workforce and implement necessary protective measures.</li> <li>Investigate and report OHS incidents involving contractors/subcontractors and ensure corrective actions are implemented.</li> <li>Monitor contractors related OHS risks and implement corrective measures when necessary.</li> <li>Ensure that contractor-provided worker health and safety conditions align with the Project Standards.</li> <li>Ensure that contractors/subcontractors have emergency response plans in place and conduct regular emergency drills to test preparedness.</li> <li>Advise and guide contractors/subcontractors on OHS best practices, ensuring that all necessary preventive measures are implemented.</li> <li>Collaborate with project teams to integrate OHS requirements into project planning, design, and execution stages.</li> <li>Track OHS performance metrics, analyze trends, and provide recommendations for continuous improvement.</li> </ul>
<b>Contractor/Subcontractors' (İnojen, Mast and Kocabey) Occupational Physicians and Occupational Health Support Staff (HSE Team)</b>	<ul style="list-style-type: none"> <li>Conduct health surveillance and periodic medical examinations for employees.</li> <li>Evaluate health screening results and inform employees about necessary precautions.</li> <li>Perform pre-employment and return-to-work medical assessments.</li> <li>Contribute to training activities on health and hygiene topics.</li> <li>Conduct pre-employment and periodic health checks for contractor/subcontractor personnel.</li> <li>Analyze health risks and provide necessary information to employees.</li> <li>Support training efforts on hygiene and health-related topics.</li> <li>Reports to the İnojen's HSE Lead.</li> </ul>
<b>Ecological Consultant</b>	<ul style="list-style-type: none"> <li>Implement the BMP of the Project.</li> <li>Train internal staff to be able to provide advice to contractors/subcontractors with input and advice, if required, and enable an informed overview of the biodiversity input from the contractors/subcontractors.</li> <li>Train the workers in the ecological sensitivities of the areas, mitigation for unforeseen events, including the presence of uncommon habitats and species.</li> <li>Check of <i>Cyclamen persicum</i> population in the Aol.</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 51 / 123

Roles	Responsibilities
	<ul style="list-style-type: none"> <li>• Implement the Invasive Alien Species Procedure.</li> <li>• Remove and re-locate <i>Testudo graeca</i> specimen outside the construction area and record this re-location.</li> <li>• Observe during bird migration periods and evaluate the effects on breeding species. After observation and evaluation, define and implement the necessary mitigation measures.</li> <li>• Carry out annual invasive species monitoring for one year after the construction phase to determine whether there are any impacts resulting from the project.</li> </ul>
<b>Archaeological Consultant</b> (during the land preparation and construction phase and if requested by the relevant authority, during the operation phase)	<ul style="list-style-type: none"> <li>• Implementation/supervision of the salvage excavation in case of a significant importance chance find upon the requirement/request of the relevant Museum Directorate.</li> <li>• Monitor and supervise construction activities, especially for the ETL line near the ancient waterway.</li> <li>• Implement the Cultural Heritage Management Plan and Chance Find Procedure.</li> </ul>
<b>QMS Team</b>	<ul style="list-style-type: none"> <li>• Ensure the all the Project activities including contractors are implemented in line with the Quality Management System of the Project.</li> <li>• Report on the Quality Management System Performance to Project Manager.</li> </ul>
<b>Human Resources (HR) Specialist</b>	<ul style="list-style-type: none"> <li>• Ensure that all Project personnel are recruited and managed in accordance with applicable labor laws, international standards (e.g., ILO Core Conventions), and the Project's Labor Management Plan (LMP).</li> <li>• Oversee implementation of the Project's employment policies including non-discrimination, equal opportunity, and prevention of child or forced labor.</li> <li>• Coordinate closely with İnojen HR Expert to ensure contractor/subcontractors workforce compliance with Project Standards.</li> <li>• Support onboarding processes including worker orientation on labor rights, grievance mechanisms, and code of conduct.</li> <li>• Participate in audits and inspections related to labor and working conditions.</li> <li>• Monitor workforce composition and ensure proper documentation of employment status, contracts, and benefits.</li> <li>• Provide input on corrective actions related to labor non-compliances.</li> </ul>
<b>Contractor's (İnojen) HR Lead</b>	<ul style="list-style-type: none"> <li>• Ensure that all İnojen personnel and subcontracted workers are hired and managed in accordance with the national and international standards.</li> <li>• Maintain up-to-date records of worker documentation including identity verification, contracts, wages, and working hours.</li> <li>• Support implementation of the workers' grievance mechanism, and ensure concerns are addressed in a timely and fair manner.</li> <li>• Coordinate with the HR Specialist for compliance reporting and audits.</li> <li>• Monitor and report on contractor's/subcontractors' compliance with working conditions, overtime, rest hours, insurance coverage, and accommodation standards (if provided).</li> <li>• Raise alerts on any suspected cases of child labor, forced labor, discrimination, or harassment.</li> </ul>
<b>Worker Representative</b>	<ul style="list-style-type: none"> <li>• Share workers' complaints, suggestions, and feedback on environmental and social issues with project management and / or the E&amp;S team.</li> <li>• Inform workers about the measures in the ESMP and raise awareness.</li> <li>• Join and encourage participation in trainings and information sessions on environment, occupational health and safety, and social impacts.</li> <li>• Inform workers about the grievance mechanism and the workers' grievance mechanism.</li> <li>• Support the functioning of the workers' grievance mechanism.</li> <li>• Attend meetings related to environmental and social issues.</li> <li>• Communicate with subcontractor worker representatives.</li> </ul>

Roles	Responsibilities
<b>Security</b>	<ul style="list-style-type: none"> <li>• Implement site-level security in accordance with the Voluntary Principles on Security and Human Rights (VPSHR) and IFC Performance Standard 4.</li> <li>• Ensure respectful conduct of security personnel toward workers and community members.</li> <li>• Maintain access control and respond to incidents in a lawful and proportionate manner.</li> <li>• Inform the HSE and Social teams of any security-related grievances or conflicts.</li> <li>• Support enforcement of PPE use, restricted area access, and site safety protocols.</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>• Follow all E&amp;S and OHS procedures and regulations set forth in the ESMP.</li> <li>• Participate in training sessions related to health, safety, and environmental protection.</li> <li>• Report any non-conformities, unsafe conditions, or contractor-related concerns to supervisors.</li> <li>• Adhere to PPE requirements and workplace safety rules.</li> </ul>

The entity overseeing the project will disseminate information regarding the project to all entities impacted by it, with particular emphasis on affected communities, residents, nearby establishments, and local government bodies. The project owner will actively engage in collaborating with these parties to identify crucial aspects of the project. The roles associated with the outlined administrative main responsibilities and their corresponding stakeholders are succinctly presented in Table 8 during stakeholder participation engagement activities.

**Table 8. Roles and Responsibilities for the Implementation of the SEP**

Responsible Party	Role	Responsibility
<b>General Manager &amp; Energy Director</b>	To ensure stakeholder engagement and grievance mechanisms are aligned with international standards and project commitments	<ul style="list-style-type: none"> <li>• Making strategic decisions regarding stakeholder engagement and grievance mechanism processes, and ensuring the implementation of the Project documents such as the ESMP and SEP.</li> <li>• Ensuring that the Project is executed in accordance with the Project Standards, ESIA commitments, contractual obligations, and stakeholder engagement requirements.</li> <li>• Oversee contractor performance and ensure that all contracted entities adhere to stakeholder engagement standards, including proper functioning of grievance mechanisms</li> <li>• Guaranteeing the provision of necessary financial, technical, and operational resources for effective, stakeholder engagement, and grievance mechanism</li> <li>• Approve high-level corrective actions for non-compliances identified in stakeholder engagement and grievance redress processes.</li> <li>• To establish an internal communication system to update senior management and staff, overseeing the Tosyalı team for effective grievance mechanism implementation, coordinating with relevant parties, and conducting consultations on specific SEP.</li> <li>• To lead engagement activities with identified stakeholders, organizing Public Consultation Meetings and disclosure events, supporting Tosyalı in stakeholder interactions.</li> <li>• To regularly update the SEP.</li> <li>• To share information with local communities and representatives.</li> <li>• To reach out to PAPs and stakeholders for site-specific project issues.</li> <li>• To conduct outreach at the regional and provincial levels.</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 53 / 123

Responsible Party	Role	Responsibility
		<ul style="list-style-type: none"> <li>• To report on the implementation of SEP activities to the Tosyali.</li> <li>• To execute the defined grievance mechanism in the SEP effectively.</li> <li>• To keep Tosyali informed about the overall implementation status.</li> <li>• To consult with and engage vulnerable groups in the vicinity.</li> </ul>
<b>Project Manager</b>	Coordinate day-to-day project activities and ensure stakeholder-related requirements are implemented on the site	<ul style="list-style-type: none"> <li>• Oversee the HSE and social management and QMS performance of the Project, including activities related to stakeholder engagement and grievance management.</li> <li>• Monitor and evaluate E&amp;S and OHS compliance with project timelines, budgets, and quality standards, ensuring that stakeholder consultation schedules and grievance response deadlines are met.</li> <li>• Ensure effective coordination between different teams (environmental, social, OHS, and contractors) for compliance with the Project Standards, to align stakeholder engagement and grievance mechanism responsibilities.</li> </ul>
<b>Environmental and Social (E&amp;S) Team</b>	Lead the planning and implementation of SEP & GM	<ul style="list-style-type: none"> <li>• Consists of an E&amp;S Chief and an E&amp;S Expert, with responsibilities shared between the two roles through task-based allocation and mutual review, rather than strict role separation.</li> <li>• Oversee compliance with E&amp;S and OHS requirements outlined in the Project Standards and SEP &amp; GM.</li> <li>• Implement and monitor the SEP to ensure contractors' adherence to environmental and social commitments, with a focus on stakeholder engagement and timely response to grievances.</li> <li>• Conduct regular inspections and audits to identify non-compliances, including issues raised by stakeholders or through the grievance mechanism, and ensure corrective actions are taken.</li> <li>• Manage stakeholder engagement and community relations related to E&amp;S management, including coordination of consultations, and public disclosures.</li> <li>• Oversee the implementation and effectiveness of grievance mechanisms for E&amp;S concerns, ensuring grievances are addressed in a timely, transparent, and culturally appropriate manner.</li> <li>• Provide technical guidance on social performance, and regulatory requirements relevant to stakeholder engagement and grievance mechanism.</li> <li>• Review and approve the management plans (based on the ESIA Report), including sections related to stakeholder engagement and grievance mechanism, prepared by the Contractor.</li> <li>• Review all environmental, social, health and safety performance data, stakeholder feedback, grievance logs, reports, and recommendations for continuous improvement delivered by HSE Lead and Social Officer and CLO.</li> <li>• Ensure that emergency response plans related to environmental and social risks are in place and tested regularly, and that communities are informed of relevant procedures.</li> <li>• Monitor and ensure contractors' compliance with labor rights, human rights, workplace safety, and community engagement practices including implementation of Grievance Mechanism in alignment with the Project Standards</li> </ul>

Responsible Party	Role	Responsibility
<b>Social Expert &amp; CLO</b>	Representing the project to stakeholders, ensuring clear communication and ongoing engagement	<ul style="list-style-type: none"> <li>• Ensure that contractors comply with social requirements outlined in the ESMP, SEP and other sub-management plans and other relevant documents.</li> <li>• Ensure that contractors comply with social requirements outlined in the ESMP, SEP and other sub-management plans and other relevant documents.</li> <li>• Manage Project-related social issues, including stakeholder engagement, community relations, and social risk mitigation.</li> <li>• Oversee the implementation of the grievance mechanism for Project-related concerns and ensure timely resolution.</li> <li>• Conduct social assessments and monitor contractor activities to identify and address potential social risks.</li> <li>• Develop and implement training programs for contractors on social responsibility, community engagement, and cultural sensitivity together with the Contractor's Social Staff.</li> <li>• Analyze social performance data, prepare reports, and provide recommendations for continuous improvement to E&amp;S Team.</li> <li>• Ensure the effective implementation of social risk assessments and the development of mitigation plans for identified social risks.</li> <li>• Facilitate dialogue between contractors and local communities to address concerns and improve relations together with Contractor's Social Staff.</li> <li>• Ensure compliance with international standards on human rights, and gender equality, in all Project activities.</li> <li>• Monitor and report on Project's adherence to non-discrimination policies and ensure inclusiveness in stakeholder engagement.</li> </ul>
<b>Worker Representative</b>	Representing the project to all Project workforce, ensuring clear communication and ongoing engagement	<ul style="list-style-type: none"> <li>• Communicate workers' complaints, suggestions, and feedback related to environmental, social, and labor issues to the project management and E&amp;S team</li> <li>• Inform and raise awareness among workers about the labor-related measures and requirements in the LMP</li> <li>• Encourage and participate in training sessions and awareness activities on occupational health and safety, environment, and social impacts</li> <li>• Inform workers about the workers' grievance mechanisms available to them and support their effective use</li> <li>• Assist in the proper functioning of the workers' grievance mechanism, ensuring timely reporting and resolution of issues</li> <li>• Maintain communication with subcontractor worker representatives to ensure consistent information flow and address shared concerns</li> </ul>
<b>Contractor's (Inojen) CLO</b>		<ul style="list-style-type: none"> <li>• Assist Social Officer and CLO regarding implementation of ESMP, SEP and other related plans and procedures.</li> <li>• Report to Social Officer and CLO regarding the Contractor-related social issues, grievances, actions taken, etc.</li> <li>• Ensure contractor personnel comply with the social requirements specified in the ESMP, SEP and other social plans and procedures.</li> <li>• Manage Contractor-related social issues, including stakeholder engagement, community relations, and social risk mitigation.</li> <li>• Oversee the implementation of the grievance mechanism for Contractor-related concerns and ensure timely resolution.</li> </ul>

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 55 / 123

Responsible Party	Role	Responsibility
		<ul style="list-style-type: none"> <li>• Monitor and report on Contractor activities to ensure compliance with Project Standards.</li> <li>• Ensure compliance with international standards on human rights, gender equality, and labor rights in all Contractor activities.</li> <li>• Monitor and report on Contractor adherence to non-discrimination policies and ensure inclusiveness in stakeholder engagement.</li> <li>• Participate in Contractor-related social inspections and audits.</li> <li>• Record and report non-conformities or violations of social requirements.</li> <li>• Assist in implementing corrective actions for identified non-compliances.</li> <li>• Identify and report non-compliance or violations of social requirements</li> <li>• Oversee day-to-day Contractor compliance with social obligations.</li> <li>• Ensure that records and documents related to social performance and compliance with Project Standards are kept up to date.</li> </ul>

The most appropriate step for the inclusion of the CLO in the project is the pre-construction phase. Therefore, Tosyalı has taken action for the CLO appointment. As illustrated in the diagram labeled Figure 3, a CLO (Community Liaison Officer) has been appointed.

The CLO's most critical role in this project during the pre-construction phase is the Livelihood Restoration Plan (LRP) process.

Throughout the LRP process, consultation activities within this organizational chart structure will be carried out under the coordination of the E&S Team with the participation of the CLO.

The period following the Pre-Construction (PC) phase will be the Land Preparation (LP) phase. In this Project İnojen Enerji Teknolojileri ve Yatırımları Anonim Şirketi (İnojen) will be responsible for engineering, procurement and construction (EPC) until the end of the construction phase.

The EPC will establish an internal social team, which will include a CLO and a social staff. Once construction begins, the EPC's social team will start working in coordination with Tosyalı's social team and will report to them. The coordination of the EPC's social team will be managed by Tosyalı. The EPC social team will, in all circumstances, be accountable to Tosyalı.

During the operation phase, which will begin after the completion of construction, only a social team reporting to the Project Owner will be active. As in all previous phases, the CLO will continue to serve as the focal point during this period as well.

The CLO's responsibilities in the stakeholder engagement process will be as follows in detail:

- Tosyalı commits to ensuring that the CLO remains in an easily accessible position at all times.
- The CLO will be actively present in the field.
- The CLO will report hierarchically to the E&S Team within Tosyalı.
- Face-to-face meetings, consultations, presentations, and other participation methods to be carried out with stakeholders will be led by the CLO.
- All consultation processes will be documented by the CLO.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 56 / 123

- The CLO will be responsible for the functioning of the grievance mechanism.
- The CLO will initiate the resolution process, follow up on it, and communicate the outcome to the stakeholder
- In the case of unresolved complaints, the CLO will provide support to the complainant in legal processes, if required.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 57 / 123

## 7 GRIEVANCE MECHANISM

### 7.1 Purpose and Scope

SEP document, developed for the project, delineated the project stakeholders, and established methods and schedules for engaging with them. The SEP outlines a comprehensive strategy for communication and engagement to ensure the fulfillment of project objectives and to execute the project in a transparent, participatory, responsive, and cooperative manner. Additionally, it sets up a mechanism for addressing grievances from stakeholders.

This grievance mechanism is established to promptly receive, and address complaints and concerns expressed by all stakeholders.

Stakeholders will be informed about the guide prepared by the IFC regarding the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV). Complaints related to GBV and SEA may lead to a culture of silence due to societal stigma. To counter this, stakeholders will be aware of the option to anonymously report such project-related complaints concerning these issues.

### 7.2 GM contact information

The primary responsibility of Tosyalı is to record and monitor complaints. In addition to Tosyalı, the social staff of the contractor will also be present on-site, following the guidelines in the SEP. Their duties include the recording and management of complaints. These designated personnel will adhere to the Grievance Mechanism to document and address all complaints from stakeholders, overseeing the specified mitigation measures. To enhance stakeholder awareness and facilitate transparent complaint submissions, project contact information will be disseminated via information meetings, project brochures, and the project website. Various official channels are available for stakeholders to voice their complaints.

Ethical issues will be reported to the Holding's ethics email address or relevant personnel via verbal communication. Contact details are provided below.

External stakeholders include local communities, neighboring organizations, national or local government institutions, non-governmental organizations, suppliers, academic institutions, media outlets, and other entities.

External stakeholders can initiate the grievance/feedback mechanism through the following channels. They may file grievances or provide feedback anonymously or by willingly sharing their personal information, free of charge:

#### Tosyalı Holding

- Website: <https://www.tosyaliholding.com.tr/>
- Address: Barbaros, Sütçü Yolu Cd. No:72, 34746 Ataşehir/İstanbul
- E-mail: [ges.projelistirme@tosyaliholding.com.tr](mailto:ges.projelistirme@tosyaliholding.com.tr)
- Phone: 0216 544 36 00
- For ethical issues: [etik@tosyaliholding.com.tr](mailto:etik@tosyaliholding.com.tr)

#### Tosyalı Demir Çelik

- Website: <https://www.tosyalidemircelik.com.tr/>
- Address: Organized Industrial Zone, Sarıseki/Hatay
- Phone: 0326 656 21 30 (1735)

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 58 / 123

## Project

- Address: Osmaniye İli Toprakkale İlçesi Türkmen Büyüktüysüz Köyü 246 Ada 2 Parsel
- Contact person of Tosyalı: Duygu Sena KOLUÇOLAK (Social Expert & CLO)
- Phone number of contact person: 0530 930 2546
- Contact person of İnojen Selin Teke (CLO)
- Appendix 1 Grievance Registration Form: PAPs have the opportunity to complete grievance registration forms available at the construction site and other accessible public locations such as village coffeehouse.
- Project specific Grievance and Feedback Submission Page: <https://hedef360.com/seclink/>

Within the scope of the information disclosure activities carried out during previous periods, the locations where Project-related information materials were made available are listed below (see Table 9).

**Table 9. Current locations of communication tools**

Locations of informative documents	Address	Locations of Complaint Box and QR Code	Address
Büyüktüysüz Mukhtarship, Auxiliary Service Building	Büyüktüysüz Mah. Büyüktüysüz Köyü Yolu No:128 Tüysüz Beldesi 80950 Toprakkale Osmaniye	Büyüktüysüz Mukhtarship, Auxiliary Service Building	Büyüktüysüz Mah. Büyüktüysüz Köyü Yolu No:128 Tüysüz Beldesi 80950 Toprakkale Osmaniye
Turunçlu village coffeehouse	Turunçlu Köyü, Turunçlu Mah. 2304 sokak Erzin, Hatay	Tosyalı SPP Unit	Osmaniye HSAW Fabrika Organize Sanayi Bölgesi P.K. 80950 Toprakkale / Osmaniye
Hürriyet village coffeehouse	Hürriyet Mahallesi Uğur Mumcu Caddesi No:58C Erzin, Hatay	Tosyalı SPP Project Area (Kocabey)	Türkmen Beldesi Büyüktüysüz Köyü 246/2 parsel Osmaniye/Toprakkale
Yeşiltepe village coffeehouse	Yeşiltepe, 31960 Erzin/Hatay		
Yolbulan - Baştuğ Vocational and Technical Anatolian High School	Türkmen Beldesi Büyüktüysüz Mah. Bilinmeyen1 Sk. No 11 Toprakkale / Osmaniye		
Tosyalı SPP Unit	Osmaniye HSAW Fabrika Organize Sanayi Bölgesi P.K. 80950 Toprakkale / Osmaniye		

Other channels;

### Presidency's Communication Center (CIMER)

CIMER serves as a platform for citizens to report various issues, lodge complaints, and make requests. CIMER has been actively utilized by citizens since its inception. This system operates through dedicated software and a web page developed by the Presidential Department of Communications, facilitating communication between citizens and the government, allowing applications to be submitted at any time and from anywhere.

In addition to its general use, the CIMER system will also be employed at the Project level to receive and address complaints from individuals affected by the Project or other concerned parties. As per the Right to Information Act, every individual has the right to access information, following the procedures and principles outlined in written regulations. This can be done by

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 59 / 123

submitting a written request through the Right to Petition or online at <https://www.icisleri.gov.tr/bilgi-edinme>.

### Foreigners Communication Center (YİMER)

The Republic of Türkiye Ministry of Interior, under the Presidency of Migration Management, is committed to providing accurate, rapid, and reliable information in accordance with the law 24/7 through YİMER 157 and other service channels for those seeking assistance. YİMER 157 provides continuous assistance to foreigners 24/7, 7 days a week, helping them with questions related to visas, residence permits, international protection, temporary protection, and more. It plays a crucial role in identifying victims of human trafficking and conducting rescue operations for those affected by migrant smuggling at sea. YİMER 157 serves as a lifeline for foreigners, aiming to be their primary source for information and assistance, accessible both within Türkiye and abroad.

### **7.3 Principles of Grievance Mechanism**

Within the Grievance Mechanism, TOSYALI will be responsible for receiving, logging, and monitoring all grievances related to the Project. TOSYALI will forward contractor-related grievances to the relevant Contractor for resolution and will ensure that responses are provided within the specified timeframe. Contractors will be responsible for directly addressing and resolving grievances related to their activities in line with the Project's Grievance Mechanism. Contractors' CLO contact information will be included in the grievance mechanism communication materials to ensure stakeholders can submit complaints directly, if preferred. Contractors will report back to TOSYALI on the status and resolution of grievances, and TOSYALI will maintain oversight to ensure timely and satisfactory closure of all cases.

Grievances related to livelihood restoration and land acquisition will be handled through the community grievance mechanism.

Establishing a widely adopted grievance mechanism is crucial for resolving issues. The failure to address concerns in various projects often stems from affected persons lacking adequate information on how to utilize the grievance mechanism. A common grievance mechanism necessitates informing both affected individuals, and the development of suitable tools that enable diverse groups to access this mechanism. Hence, it is crucial to create appropriate tools that facilitate the accessibility of the mechanism for women, youth, the elderly, other vulnerable groups, and those who are illiterate.

The prompt reception of complaints is linked to the openness and accessibility of complaint channels. Complaints must be documented by the mechanism within 2 days, and the resolution process will be promptly initiated. The sample forms for registration are illustrated by Appendix 1 Grievance Registration Form, and Appendix 2 Grievance Closeout Form.

Detailed information about grievance mechanism implementations also defined Project-specific Grievance Mechanism Procedure (Please refer to REQUEST / COMPLAINT / SUGGESTION MANAGEMENT SYSTEM PROCEDURE Doc No: P.01.07.02. dated 03.09.2025). TOSYALI commits to ensuring that this procedure is aligned with the scope of the SEP and is revised in line with any updates to the content of the SEP.

The grievance mechanism will be structured to accommodate the submission and resolution of anonymous complaints. Submitting a grievance will not necessitate personal information or physical presence; however, stakeholders have the option to include personal details if they choose to do so. All stakeholders will have the option to raise their complaints or concerns

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 60 / 123

anonymously. This especially provides confidence to vulnerable individuals that they will not encounter any obstacles when expressing concerns. All grievances when received are logged into a GM database (Appendix 3 Grievance Evaluation Form (F.01.07.06) and ) to facilitate tracking and monitoring.

Following thorough investigations, if resolving the issue falls under the responsibility of another unit, the complaint must be forwarded to the relevant unit within 2 business days. Depending on the importance of requests, suggestions and complaints, major complaints are responded to within 2 business day and minor complaints within month.

The remedies and corrective actions proposed need to meet the satisfaction of the Complainant. It is essential that all involved parties reach an agreement on corrective actions during the resolution process. In scenarios where a satisfactory solution cannot be reached, a meeting will be arranged with the complainant, and holding consultation sessions with contractor. However, it will be understood by all parties involved that complainants who are not content with the resolution can seek legal recourse.

Should the complainant feel that the grievance has not been satisfactorily addressed by the Tosyalı and specialists of contractor, they may request the matter to be escalated to the next level. A Grievance Redressal Committee (GRC) will be established, comprising local representatives and relevant institutional representatives. Independent experts will be selected from local universities, institutes, or non-governmental Organizations (NGOs). The GRC will be activated if a resolution cannot be reached at the initial level.

The complainant has the option to request Tosyalı or Community Liaison Officer (CLO) at the site to forward their grievances to the GRC. This allows complaints previously considered by Tosyalı or Construction Contractors/subcontractors, yet unresolved, to be re-evaluated by the Committee. Tosyalı is tasked with updating the GRC on the discussions from the first stage of redressal and presenting the perspectives of both involved parties.

At the conclusion of the 30-day period allocated for resolving the complaint, the decision or outcome must be communicated to the complainant formally in writing. The date of this feedback will be documented in the Grievance Mechanism (GM) as the official closing date of the complaint. Actions taken to resolve the closed complaint will be monitored. A sample complaint closure form is provided in Appendix 2 Grievance Closeout Form

World Bank's "Prevention of SEA, SH and GBV guideline prepared to inform Borrowers", and Tosyalı about how to handle complaints.

To see all the steps of the grievance mechanism please refer to Figure 4.

#### 7.4 Workers' Grievance Mechanism

All Project workers will be informed about Workers' Grievance Mechanism (WGM) at the time of their recruitment, and their employment contracts will involve detailed information of WGM including the ways they can convey their grievances and how these grievances will be recorded, handled, and monitored. The contractors will also ensure that the workers of their subcontractors are aware and can utilize the established WGM. The following principles on which the contractors/subcontractors will base their WGM will also be written in the relevant section of employment contracts:

- **Awareness.** WGM will be introduced to the workers at the workplace, through on-the-job training and other communication tools and participation methods. This introduction

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 61 / 123

will explain the procedure, including the steps to be followed to convey complaints and requests, the channels of reception to be used, etc.

- **Accessibility.** The WGM will be established such that it can be accessed by workers easily, i.e. grievance boxes, e-mail, petition, QR code.
- **Anonymity.** Workers will have the right to submit their requests anonymously and these anonymous grievances will be treated equally with other complaints such as those of known origin.
- **Traceability.** The applications received from different channels of reception will be subject to a standard grievance mechanism operation procedure to be developed by Tosyalı.
- **Confidentiality.** The identities of complainants (if they do not prefer to be anonymous) will not be disclosed without obtaining their consent and their communication details will not be shared with third persons.
- **Archiving.** All complaints sent from application channels (written, verbal, etc.) will be recorded together with their supporting documents and will not be used for purposes other than the project implementation purposes, nor shall they be shared with third persons.

The WGM will be established according to the procedure below:

- **Step 1. Informal discussion:** Managers and workers are encouraged to use informal methods of resolving disagreements or disputes. If employees have a reasonable grievance or complaint regarding their work or the people they work with they will, wherever possible, start by talking it over with their manager. If discussions with line managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure, i.e., a human resources (HR) manager could host an informal meeting or discussion.
- **Step 2. Formal grievance:** If the matter is serious and/or the employee wishes to raise the matter formally, they will set out the grievance in writing to their manager. Where the grievance is against the employee's manager and the employee feels unable to approach them, the employee will address the grievance to another manager or the HR department. If there is a trade union at the workplace, the employee may wish to ask a union representative for advice and support.
- The contractor will provide appropriate channels to uptake formal grievances for the worker, i.e., e-mail, telephone, suggestion boxes. Especially, suggestion boxes will be placed so that anonymous grievances can be made. Anonymous complaints can be submitted through complaint boxes or the QR code complaint reporting software.
- **Step 3. Grievance hearing:** A designated manager (normally from the HR department, hereafter the "grievance manager") will call the employee to a meeting, within a determined period after receiving the complaint, to discuss the employee's grievance. The employee will have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. After the meeting, the grievance manager will give the employee a decision in writing, within a determined period.
- **Step 4. Appeal:** If the employee is unhappy with the grievance decision and wishes to appeal, then the employee will be invited to an appeal meeting within a defined period and the appeal will be heard by a more senior manager, ombudsman or a grievance committee. The members of grievance committee will consist of at least the grievance manager, employee's manager (responsible from the work definition of the employee), one manager from the upper management and the aggrieved party/worker representative. The employee will normally have the right, upon request, to be

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 62 / 123

accompanied by a colleague or trade union representative at this meeting. Every effort will be made to secure a resolution in the best interests of the worker(s) and the company. After the meeting, the senior manager, ombudsman or grievance committee will give the employee a decision. This decision is final within the terms of the company's internal grievance mechanism. If the worker is not satisfied, he or she will have the right to judicial or administrative channels.

If the construction contractors/subcontractors have an already established WGM, they can utilize that WGM provided that it is in line with the principles and procedures described in this section and records regarding the Project are kept separately. The requirements for contractor to establish WGM before the mobilization phase and to operate and maintain throughout the subproject activities will be incorporated in the bid documents.

For any complaint that has been forwarded or directly submitted—given that the contact details of the complainant are provided—the complainant will be informed, within two days that the complaint has been received. If the complaint is conveyed through suggestion boxes—provided that suggestion boxes at workplaces will be opened on a weekly basis—the complainant will be informed within two days after the suggestion box is opened. The social staff of the Contractor and the relevant staff will investigate within two weeks and try to resolve the complaint. After two weeks, the aggrieved complainant would be given the status of resolution of his grievance.

Detailed information about grievance mechanism implementations also defined Project-specific Grievance Mechanism Procedure (Please refer to REQUEST / COMPLAINT / SUGGESTION MANAGEMENT SYSTEM PROCEDURE Doc No: P.01.07.02. dated 03.09.2025). Tosyalı commits to ensuring that this procedure is aligned with the scope of the SEP and is revised in line with any updates to the content of the SEP.

Contractors will be required to establish worker grievance mechanism in line with the principles of the Tosyalı's mechanism, before the mobilization phase and to operate and maintain throughout the project activities.

Contractors will keep the written copies and a written list of complaints submitted to them. In addition, to facilitate analysis, monitoring and reporting, these complaints will be logged into a database, indicating contractor/subcontractor, type of complaint and solution. Contractors will send a copy of this database to the Social Officer of Tosyalı once a month, within the framework of standard reporting. The Social Officer of Tosyalı will maintain a master database of all complaints during the Project.

The contact person's information, who has a responsibility for the implementation of Project's Worker Grievance Mechanism (in addition to the above-mentioned channels: see Section 7.2) is as follows:

#### Worker representatives

- Address: Osmaniye İli Toprakkale İlçesi Türkmen Büyüktüysüz Köyü 246 Ada 2 Parsel
- Contact person: Diyar LAVENT (Worker representative)
  - Phone number of contact person:+90 545 122 02 17
- All the tools included in grievance mechanism will be adopted for Workers' Grievance Mechanism. Complaint boxes, Grievance Registration Form for Employee's, ethic channel, phone numbers, addresses, and online communication pages will be available for all Project's employees.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 63 / 123

## **Sexual Exploitation and Abuse / Sexual Harassment**

Project WGM will have a dedicated section for grievances related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) in case a worker prefers to raise this grievance through WGM. The process for filing a grievance must be simple and easy to understand and clearly prohibit any kind of reprisal against workers who file grievances, including those relating to sexual harassment. Without adequate safeguards in place, there are risks of stigmatization and reprisals against workers who make allegations of sexual harassment.

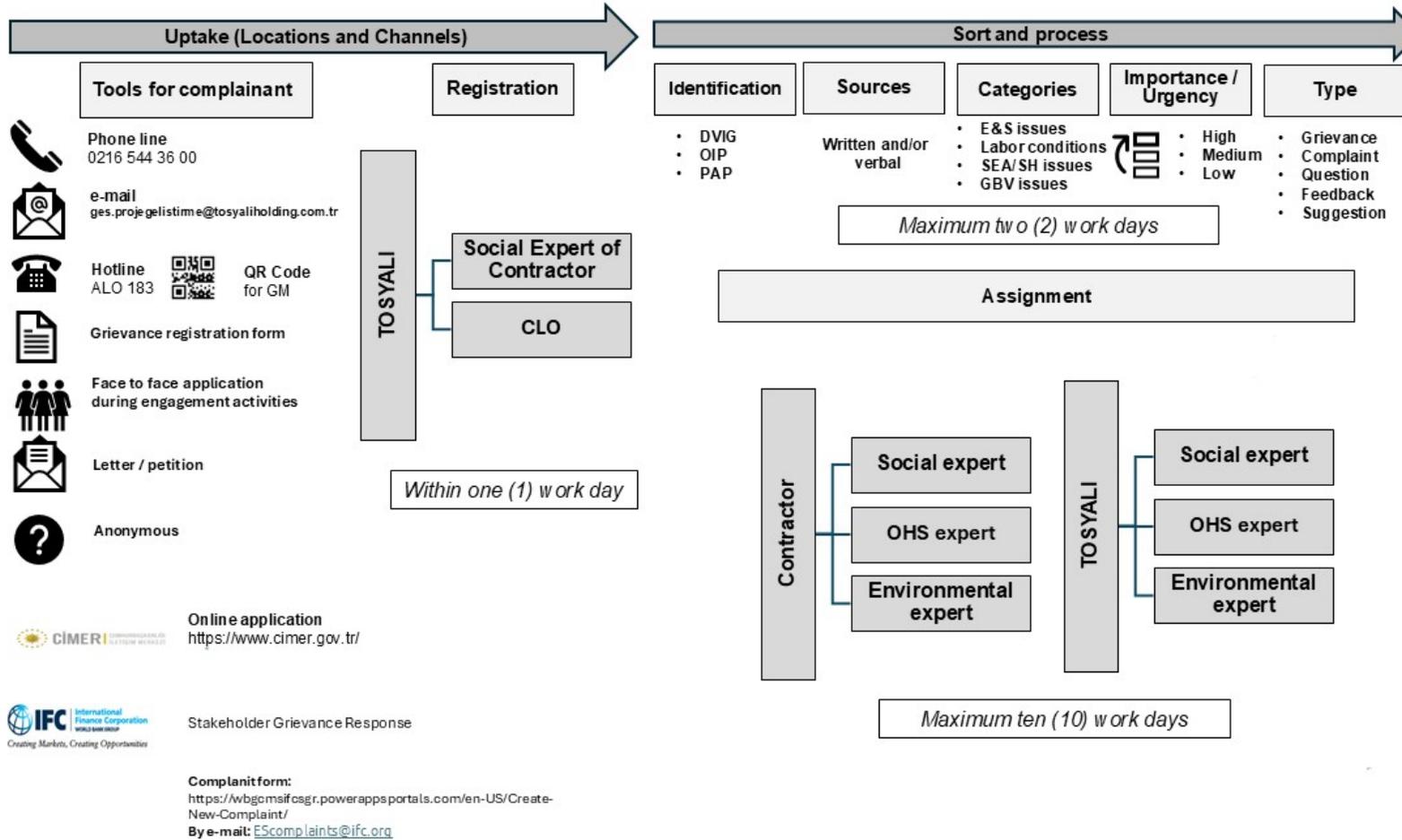
The grievance receiving party will ensure that the case is dealt with through a survivor-centric approach respecting confidentiality and anonymity of the person and survivors are referred to service providers. Opinions of experts and consultants can be obtained in the solution to these problems in accordance with the national legislation and IFC requirements.

The protocols and procedures will be based on the following principles:

- All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.
- Criminal cases will be referred to the public prosecutor.

Handling grievances that are sensitive will be treated in full confidentiality. To enable female work force to safely access the WGM, labor trainings will include information on the various channels of the raising grievances and confidentiality of doing so. The gender specialist of Tosyalı will ensure that contractors/subcontractors provide such training to workers, and to train contractors/subcontractors on how to collect grievances confidentially.

Türkiye already has a national referral system for SEA/SH, and workplace related harassment, bullying, and violence, and there are provisions in both the Labor Law and the Penal Code for this type of behavior that is deemed unacceptable. In addition, psycho-social support is also provided and available for survivors. When necessary, the social expert will refer the survivors to the Ministry of Family and Social Services call center (ALO 183) for SEA/SH, and to the Ministry of Labor and Social Security call center (ALO 170) for workplace-based psychological harassment-mobbing, violence, and bullying, etc. and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues.



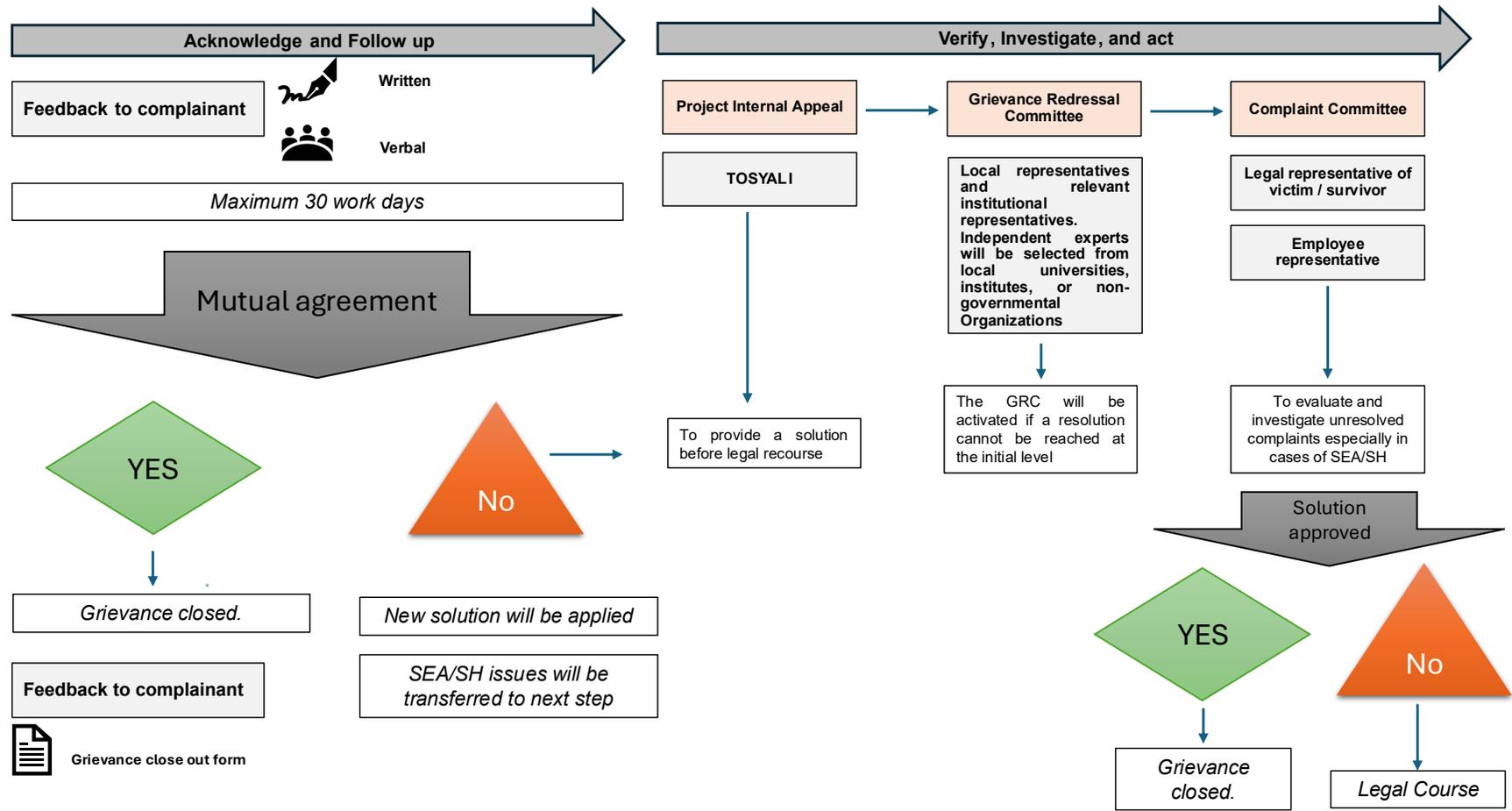


Figure 4: Grievance Mechanism Flowchart

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 66 / 123

## 8 MONITORING AND REPORTING

### 8.1 Monitoring Reports in the Course of the Project

In the role of Tosalı, a systematic monitoring process will be established for the Grievance Mechanism (GM). This approach involves the methodical collection of feedback from a diverse range of sources, including communities, local governmental bodies, other corporate entities, non-governmental organizations (NGOs), the media, academic institutions, and other interest groups. The effectiveness of this process will be ensured through purposeful consultations and the use of the Grievance Mechanism. If necessary, a comprehensive report summarizing all stakeholder engagement activities, including grievance tracking, will be compiled and presented to the relevant regulatory agency.

Additionally, the project owner pledges to maintain transparent communication channels with relevant stakeholders as dictated by the situation. Any newly identified stakeholders will be promptly added to the stakeholder list, with communication initiated accordingly. In the case of significant changes or updates to the project, the project owner will persist in addressing and disseminating information about environmental and social concerns to the relevant stakeholders. Notifications regarding improvements, upgrades, and issues related to the environment and society will be conveyed promptly following the procedures outlined in this SEP.

The SEP, which delineates the project's social and environmental framework, will undergo periodic revisions, especially when significant changes to the project occur. These revisions will provide concise summaries of concerns, issues, and inquiries that have arisen over the past year, along with details about any deviations from the initially planned activities or events.

### 8.2 Involvement of Stakeholders in Monitoring Activities

Table 10 has been crafted to outline the key performance indicators (KPIs) and designates the responsible parties tasked with overseeing this endeavor.

KPI-01 entails comprehensive recording and analysis of all written and verbal feedback, including anonymous complaints, alongside documentation of open and closed complaint numbers, actions taken for closed complaints, and efforts to reduce open complaints. Additionally, it involves recording minutes of meetings, capturing photographs if permissions are granted, maintaining grievance logs, reviewing documentation, and evaluating social compliance conditions of project implementations. KPI-02 involves the appointment of CLOs, including female CLOs, the assignment of grievances to relevant departments, and the institution of a PR office on-site. KPI-03 focuses on the meticulous recording of all written and verbal feedback, including anonymous complaints. Lastly, KPI-04 revolves around the monitoring of contractor/subcontractors' activities engaged in grievance management.

### 8.3 Reporting Back to Stakeholder Groups

The SEP will undergo regular updates as deemed necessary throughout the project. Team members responsible for this task will compile periodic reports on stakeholder complaints and inquiries, detailing the status of corrective actions. These reports, whether on a quarterly basis or at other intervals, will assist in evaluating the number and nature of issues and the project's effectiveness in addressing them. Information about the project's public engagement activities will be communicated to stakeholders through various channels as required. This will include reporting to stakeholders on progress, implementation of E&S mitigation measures, and

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 67 / 123

updates on any reported concerns which is usually presented through an Annual Report to the Affected Communities.

Tosyalı will undertake ongoing reporting in line with the requirements of IFC PS1 Paragraph 36. Regular reporting will be conducted throughout the life of the Project to ensure transparency and continuous stakeholder engagement. In line with IFC Performance Standard 1, paragraph 36, the Project will ensure ongoing and timely disclosure of relevant environmental, social and occupational health and safety (OHS) risks and impacts to affected stakeholders throughout the land preparation & construction, and operation phases.

Such disclosure will be conducted at least on an annual basis and whenever there are material changes to Project activities, risk profiles, mitigation measures or emergency preparedness and response procedures. Reporting will, at a minimum, include information on Project progress, implementation of environmental and social mitigation measures, Community Health, Safety and Security (CHSS) performance, emergency preparedness arrangements, and a summary of grievances received and their resolution status.

Regular monitoring will be conducted in and around the Osmaniye SPP area, including sensitive receptors, in relation to Community Health, Safety and Security (CHSS) risks. The outcomes of these monitoring activities will be documented through monthly activity reports. Information derived from CHSS monitoring and reporting will be shared with affected stakeholders through appropriate and accessible communication channels such a web site, including meetings, information boards, , brochures, QR codes and other suitable places for public.. Besides, regular dissemination of Project related risks and emergency procedures will be shared and reporting will be in line with IFC Performance Standard 1, paragraph 36, but does not indicate the content of the reports. Relevant information about risks and emergency response procedures must be disclosed to those stakeholders that would be involved in preparedness or response, or that could be impacted by potential emergency scenarios.

Project will not have negative impacts to Yörüks' intangible cultural heritage; however, this topic will be added in future regular consultations as per the updated CHMP. As part of ESIA disclosure, Tosyalı will consult relevant stakeholders (e.g. cultural heritage protection authorities and civil society organisations) on the results of the ESIA, in particular on the adequacy of the mitigation measures proposed.

Principle 10 recommends projects to 'to share commercially non-sensitive Project-specific biodiversity data with the Global Biodiversity Information Facility (GBIF) and relevant national and global data repositories, using formats and conditions to enable such data to be accessed and re-used in future decisions and research applications.' In line with this recommendation Project will share such information (e.g. biodiversity baseline) with either the GBIF or any national repositories.

Project-documents as mentioned ESIA and LRP will be disclosed on Project website and made available in Turkish and English, and hard copies will be accessible at agreed local disclosure points (e.g., Municipality, Mukhtar's office) to ensure accessibility for all stakeholders. Accordingly, the ESIA will be disclosed on the Project website in both Turkish and English for the duration of the Project, in line with EP4 requirements on transparency and reporting.

Ensuring the regular dissemination of project-related risks and emergency procedures to highly vulnerable groups (Yörük families), sensitive receptors (High School) and other external stakeholders (local residents of nearby settlements) through information meetings, awareness sessions, and communication materials.

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 68 / 123

The Project will conduct informative activities to engage local communities on emergency preparedness and response. These activities will include regular meetings with Yörüks, representatives of the High School, and local residents of nearby settlements. Awareness sessions will be conducted by distribution of brochures and information sheets, and delivering of visual materials at community gathering points, such as coffeehouse.

Information shared will cover potential emergency risks, preventive measures, evacuation routes, and assembly points.

Feedback and concerns raised by communities will be collected through the CLO and registered under Project-specific GM. The outputs will be integrated into the continuous improvement of the EPRP.

**Table 10. Monitoring Plan**

Key Performance Indicator	Target / Threshold	Method of measurement	Responsibility	Project phase
Number of informative documents	Preparation of documents containing summary information about the project with contact information and sharing it with stakeholders	Visual document such as posters, brochure, FAQ document.	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry
Number of announced Project documents including SEP on official website	Timely and publicly accessible sharing	Official website of Tosyali	<u>Implementation:</u> E&S Team	Prior to land entry
Number of stakeholder consultation with local governmental institutions	Consultation with 90% of local government bodies identified in the stakeholder list	Consultation log Minutes of Meeting (MoM) Photograph Submitted project information documents Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry
Number of stakeholder consultation with NGOs (especially Yörüks')	Consultation with 80% of NGOs identified in the stakeholder list	Consultation log MoM Photograph Submitted project information documents Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry
Number of community level consultation meeting with local representatives	At least one meeting with the mukhtar or council member of each settlement	Consultation log MoM Photograph Leaving printed copies of project documents at the mukhtar's office or common area Submitted project information documents Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry
Number of community level consultation meeting with local residents	Organizing meetings with at least 10-20 participants, including the participation of disadvantaged groups, in each of the settlements	The fulfillment of accessible venue and convenient scheduling condition Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry
Number of consultation with identified highly vulnerable groups (Yörüks) and sensitive receptors	Organizing a focus group meeting with the identified vulnerable groups in each settlement	The fulfillment of accessible venue and convenient Scheduling condition Consultation log MoM Photograph Submitted project information documents Attendance list	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Prior to land entry

Key Performance Indicator	Target / Threshold	Method of measurement	Responsibility	Project phase
		Grievance logbook		
Number of household level consultation activities	Conducting interviews with a number of households representing the total households identified within the primary and secondary social impact area	Conducting face-to-face interviews Reaching women household heads Contacting a number of individuals representing the sample Completed survey forms Photograph Submitted project information documents	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	Land preparation and construction
Consultations with Yörüks, formal & informal user of ETL areas, if will be available	Organizing at least one meeting with Yörük families & identified formal & informal user of ETL areas, if will be available	The fulfillment of accessible venue and convenient scheduling condition Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	Land preparation and construction
% of grievances resolved through GM within target timeframe	Timely registration and resolution of grievances, and regular dissemination of GM performance information to stakeholders	Grievance logbook, periodic GM reports	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	All project phases
% of updated informative documents prepared and shared	Preparation of updated informational documents according to the project status	Visual document such as posters, brochure	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	Land preparation and consultation
% of updated project documents published on official website	Timely and publicly accessible sharing	Official website of the Project	<u>Implementation:</u> E&S Team	Land preparation and consultation
Number of annual meetings with local governmental institutions	Organizing at least two meetings annually with the participation of local authorities.	Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	Land preparation and consultation
# of annual meetings with NGOs (especially Yörüks')	At least two annual meetings with NGOs that continue to show interest in the project.	Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO İnojen's CLO	Land preparation and consultation
# of quarterly meetings with mukhtars	The CLO holds meetings with the mukhtar of each settlement identified around the primary	Consultation log	<u>Supervision:</u> E&S Team	Operation

Key Performance Indicator	Target / Threshold	Method of measurement	Responsibility	Project phase
	and secondary social impact area every three months	MoM Photograph Leaving printed copies of project documents at the mukhtar's office or common area Submitted project information documents Grievance logbook	<u>Implementation:</u> Social Expert & CLO	
Consultations with Yörüks, formal & informal user of ETL areas, if will be available	Organizing at least one meeting with Yörük families & identified formal & informal user of ETL areas, if will be available	The fulfillment of accessible venue and convenient scheduling condition Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO Inojen's CLO	Land preparation and construction
% of grievances resolved through GM within target timeframe	Timely registration and resolution of grievances, and regular dissemination of GM performance information to stakeholders	Grievance logbook, periodic GM reports	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO Inojen's CLO	All project phases
% of updated informative documents prepared and shared	Preparation of updated informational documents according to the project status	Visual document such as posters, brochure	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Operation
% of updated project documents published on official website	Timely and publicly accessible sharing	Official website of the Project	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Operation
Number of annual meetings with local governmental institutions	Organizing at least two meetings annually with the participation of local authorities.	Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Operation
# of annual meetings with NGOs (especially Yörüks')	At least two annual meetings with NGOs that continue to show interest in the project.	Consultation log MoM Photograph Submitted project information documents Attendance list Grievance logbook	<u>Supervision:</u> E&S Team  <u>Implementation:</u> Social Expert & CLO	Operation
# of quarterly meetings with mukhtars	The CLO holds meetings with the mukhtar of each settlement identified around the primary	Consultation log	<u>Supervision:</u> E&S Team	Operation

Key Performance Indicator	Target / Threshold	Method of measurement	Responsibility	Project phase
	and secondary social impact area every three months	MoM Photograph Leaving printed copies of project documents at the mukhtar's office or common area Submitted project information documents Grievance logbook	<u>Implementation:</u> Social Expert & CLO	

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 73 / 123

## 9 APPENDICES

### Appendix 1 Grievance Registration Form

#### - Stakeholder Communication Form

	<b>PAYDAŞ, DİLEK, ŞİKAYET İLETME FORMU</b>	<b>Doküman No</b>	F.01.07.03
		<b>Dok.Tarih:</b>	05.04.2024
		<b>Revizyon:</b>	0
		<b>Sayfa:</b>	1 / 1
<b>İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ:</b> (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)			
Tarih :			
İrtibat Bilgisi : (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz. Posta yolu ile:..... Telefonla : ..... E- Posta yolu ile : .....			
Tepkinizi belirtin : <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet		Şikayet Doldurulmuş iletişim formu suretinin alındığını teyit eden imza.....	
Kaydeden : Yorum / şikayet sunan kişi <input type="checkbox"/> Diğer ( lütfen kim olduğunu belirtin)			
<b>PROJE HAKKINDAKİ YORUMLARINIZ</b> (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
<b>YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER</b>			
Yorum/ Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
Yorum / Şikayet İlgili Olay Tarihi <input type="checkbox"/> Tek seferli olay / şikayet (Tarih : .....) <input type="checkbox"/> Bir defadan fazla mı oldu (Kaç Kez?.....) <input type="checkbox"/> Devam ediyor ( Problem halen yaşanıyor)			
Problemi çözmek için ne öneriyorsunuz ? (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
Bu kısım proje yönetimi tarafından doldurulacaktır.			
<b>YORUM DURUMU</b>			
Yorum Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Gerekli Tepki (E/H)	Müdahale tarihi:		
<b>ŞİKAYETÇİ DURUMU</b>			
Şikayet Kayıt (E/H):	Sunum Tarihi :	Kaydeden:	
Cevap Gönderim Tarihi :	Şikayet Kapatıldı (E/H) :	Kapatma Tarihi / İmzası :	
<b>İRTİBAT NUMARASI : 0530 930 2546 (DUYGU SENA KOLUÇOLAK)</b>			

STAKEHOLDER ENGAGEMENT PLAN		CNR-PLN-TOS-OSM-SEP-001
Final	Date: January 2026	Page 74 / 123

- Employee Grievance Form

	.....GES PROJESİ ÇALIŞAN DİLEK, ŞİKAYET İLETME FORMU	Doc. No: F.01.07.04 Doc.Date: 3.09.2025 Rev. No: 0
REFERANS NO: (Sorumlu kişi tarafından doldurulacaktır.		
ANONİM <input type="checkbox"/>	Kimliğinizi beyan etmek istemiyorsanız, bu formu doldururken, yanında 'Anonim' yazılı kutuyu işaretleyebilir veya izniniz olmadan kimlik bilgilerinizin üçüncü taraflarla paylaşılmamasını talep edebilirsiniz.	
ANONİM DEĞİL <input type="checkbox"/>	'Anoni' kutusu işaretlendiğinde, istek/ şikayet doğrudan yanıtlanmayabilir.	
İSİM SOYİSİM		
ADRES		
İLETİŞİM		
<b>Olay ve şikayetin tanımı:</b> Ne oldu ? Nerede oldu ? Kimin başına geldi ? Sorunun sonucu nedir ?		
Olay /Şikayet Tarihi:		
Bir seferli olay <input type="checkbox"/>	Birden fazla (kaç kez): ..... <input type="checkbox"/>	Devam Eden : <input type="checkbox"/>
Sizce bu sorunu nasıl çözmemiz gerekir ?		

<b>STAKEHOLDER ENGAGEMENT PLAN</b>		<b>CNR-PLN-TOS-OSM-SEP-001</b>
Final	Date: January 2026	Page 75 / 123

## Appendix 2 Grievance Closeout Form

	<b>GRIEVANCE CLOSEOUT FORM</b>	Doc. No: F.01.07.10 Doc.Date: 3.09.2025 Rev. No: 0
Grievance Closeout number:		
Reference No of Grievance		
Define long term action required (if necessary)		
Compensation Required ?		
<b>CONTROL OF REMEDIATE ACTION AND DECISION</b>		
Stages of the remediate Action		Deadline and Responsible Instutions
1.		
2.		
3.		
4.		
5.		
This part will be filled amd signed by the complainant after S/he receives the compensation fees and /or his/her complaint has been remediated.		
Full Name		Signature
Date		
Of the Complainant:		
Full Name		Signature
Date		





## Information About the Complainant

Complaint Number Şikayet Numarası	Project	Location	Created By Oluşturan	Complaint Date Şikayet Tarihi	Create Date Oluşturma Tarihi	Gender Male Female Cinsiyet Erkek Kadın	Contact information - Adress İletişim Bilgileri-Adres
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## WISHES, SUGGESTIONS, COMPLAINTS, FOLLOW-UP EVALUATION FORM

Information Regarding the Complaint								
Subject	Summary	Major / Minor	Priority Low Medium High Öncelik Düşük Orta Yüksel	Stakeholder Categories -PAPs -Mukhtars or other community representatives -Project Workers -Project Subcontractor -Sivil Society -Governmental Institution -Public Institutions Paydaş Katagorisi -Muhtarlar ve diğer topluluk temsilcileri -Proje Çalışanları -Proje Taşeronu -Sivil Toplum -Devlet Kurumu -Kamu Kurumu -Medya	Vulnerability (Yes/No) Please Specify	Category Katagori	Submission Type	

RM

Çözümüne ait Bilgiler/Information about the Solution									
Responsibility Tosyalı Supervision Construction Contractor Sorumlu Tosyalı Müşavir İnojen Alt Yüklenici	Yanıt Tarihi / Response Date	Solution Proposal	Status	Action / (Actions Taken to Resolve the Grievance) Aksiyon / (Şikayetin çözümüne yönelik yapılan işlemler)	Final Condition	Assigned Team	Attached a grievance Clouse out form İlgili çözüm formu	Comments	Attached photos if available Varsa ekli fotoğraflar

Doc. No:/ Dok. No: F. 01.07. 06 Doc. Date/ Yayın Tarihi :02.03.2025 Rev. Date / Rev. Tarihi :		
<b>KPI</b>		
Kapanış Süresi / Closure time (days)	Frequency/Şikayetin Sıklığı	Root Cause/Kök Neden

PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration (F.01.07.05) is given as follows. Close-up visuals are also given after the form visual.

PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration																		Doc. No/ Doküman No: F. 01.07. 05 Date of Issue / Yayın Tarihi : 19.04.2025 Rev. Date / Rev. Tarihi :	
Consultation Number Görüşme Numarası	Impact Area	Due Date	Actual Date	Explanation/Açıklama	Consultation Type/ Görüşme Türü	Tosyalı adına İletişim Kuran Kişi / Contact Person on Behalf of Tosyalı	Date	Project	Location / Institution	Stakeholder Categories Paydaş Kategorisi	Participant Detail	Category	Sub Category Alt Kategorisi	Number of Participants	Priority / Öncelik	Project Phase Proje Aşamaları	Gender	Age	Name and Surname
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			

		<b>PAP and Stakeholder MEETING PLAN&amp;</b>				
Consultation Number Görüşme Numarası	Impact Area	Due Date	Actual Date	Explanation/Açıklama	Consultation Type/ Görüşme Türü	Tosyalı adına İletişim Kuran Kişi / Contact Person on Behalf of Tosyalı

<b>PAP and Stakeholder MEETING PLAN&amp;PAP and Stakeholder Meeting Stakeholder Registration</b>											
Tosyalı adına İletişim Kuran Kişi / Contact Person on Behalf of Tosyalı	Date	Project	Location / Institution	Stakeholder Categories Paydaş Katagorisi	Participant Details	Category Kategori	Sub Category Alt Katagori	Number of Participants	Priority / Öncelik	Project Phase Proje Aşaması	

						Doc. No:/ Doküman No: F. 01.07. 05 Date of Issue/ Yayın Tarihi :19.04.2025 Rev. Date / Rev. Tarihi :
Sub Category Alt Katagori	Number of Participants	Priority / Öncelik	Project Phase Proje Aşaması	Gender	Age	Name and Surname

#### Appendix 4 List of stakeholders

Region	Stakeholder Group	Name of Stakeholder
	Project affected parties (PAP)	
OSMANİYE	Local residents and local representatives	Büyüktüysüz neighborhood of Toprakkale district
HATAY	Local residents and local representatives	Turunçlu neighborhood of Erzin district
		Hürriyet neighborhood Erzin district
		Yeşiltepe neighborhood Erzin district

Region	Stakeholder Group	Name of Stakeholder
OSMANİYE & HATAY	Disadvantaged/Vulnerable Individuals or Groups (DVIG)	Yörüks
		Vocational high school students providing access via pedestrian and public transportation
		Non-Turkish speaker people
		Illiterate adults
		Disabled people
		Elderly people
		Female household heads
		Refugees, and/or asylum seekers

Region	Stakeholder Group	Name of Stakeholder
	Other Interested Parties (OIP)	
OSMANİYE	Governmental Institution	•Governorship of Osmaniye
		•Osmaniye Municipality
		•Osmaniye Organized Industrial Zone
		•Osmaniye Provincial Directorate of Culture and Tourism
		•Osmaniye Provincial Directorate of Environment, Urbanization, and Climate Change
		•Osmaniye Regional Directorate of Forestry
		•Osmaniye Provincial Directorate of Commerce
		•Osmaniye Chamber of Commerce and Industry
		•Turkish Employment Agency (İŞKUR) Osmaniye Provincial Directorate
		•Osmaniye Provincial Directorate of Family and Social Services
		•Osmaniye Provincial Directorate of Disaster and Emergency
		•Osmaniye Provincial Special Administration
		•64th Branch Directorate of DSİ
		•Toprakkale District Governorship
		•Toprakkale Municipality
		•Toprakkale Rural Service Delivery Union
		•Toprakkale District Police Department
		•Toprakkale District Gendarmerie Command
		•Toprakkale Social Solidarity and Aid Foundation
	•Toprakkale District Directorate of Agriculture and Forestry	
•Toprakkale Agricultural Credit Cooperative		
•Türkmen Municipality		
Education	•Osmaniye Provincial Directorate of National Education	

Region	Stakeholder Group	Name of Stakeholder
	Other Interested Parties (OIP)	
		•Osmaniye Korkut Ata University
		•Toprakkale District Directorate of National Education
		•Mehmet Cevlani Önal Primary School
		•Büyük Tüysüz Primary School
		•Tüysüz Şehir Bekir Evirgen Primary School
		•Tüysüz Şehit Mehmet Gaser Secondary School
		•Yolbulan-Baştuğ Vocational and Technical Anatolian High School
	Health	•Osmaniye State Hospital
		•Osmaniye Yeni Hayat Hospital
		•Osmaniye Provincial Health Directorate
		•Toprakkale District Health Group Presidency
		•Toprakkale District State Hospital
	Agriculture, Livestock and Fishery	•Osmaniye Provincial Directorate of Agriculture and Forestry
		•Toprakkale District Directorate of Agriculture and Forestry
		•Toprakkale Chamber of Agriculture Presidency
		•Toprakkale Agricultural Credit Cooperative
	Energy	•Toroslar Elektrik Dağıtım A.Ş.
	Development Agency	•Doğu Akdeniz Development Agency (DOĞAKA)
	NGOs / Cooperatives and Unions	•Toprakkale Merkez Irrigation Cooperative
		•Toprakkale Yörük-Türkmen Association
		•Toprakkale Women's Initiative Production and Management Cooperative
		•Toprakkale Kilim Cooperative
		•Osmaniye Entrepreneur and Producing Women Association
	Media	•Akdeniz Gazetesi
•Başak Gazetesi		
•Osmaniye Yurt Gazetesi		
•Aydın Osmaniye Gazetesi		
•Sabır Gazetesi		
•Haber Osmaniye		
Nearby Energy Investment	•Erzin-1 SPP	
	•Erzin-2 SPP	
HATAY	Governmental Institution	•Governorship of Hatay
		•Hatay Metropolitan Municipality
		•Hatay Erzin Organized Industrial Zone
		•Hatay Provincial Directorate of Culture and Tourism
		•Hatay Regional Directorate for the Protection of Cultural Assets
		•Hatay Provincial Directorate of Environment, Urbanization, and Climate Change
		•Hatay Regional Directorate of Forestry
		•Hatay Provincial Directorate of Commerce
		•Hatay Chamber of Commerce and Industry
		•Turkish Employment Agency (İŞKUR) Hatay Provincial Directorate
		•Hatay Provincial Directorate of Family and Social Services
		•Hatay Provincial Special Administration

Region	Stakeholder Group	Name of Stakeholder
	Other Interested Parties (OIP)	
		•63rd Branch Directorate of DSI
		•Erzin District Governorship
		•Erzin Municipality
		•Erzin Rural Service Delivery Union
		•Erzin District Police Department
		•Erzin District Gendarmerie Command
		•Erzin Social Solidarity and Aid Foundation
	Education	•Hatay Provincial Directorate of National Education
		•Hatay Mustafa Kemal University
		•Erzin District Directorate of National Education
		•Erzin Zekiye Cavidan Özmen Primary School
		•Erzin Secondary School
	Health	•Erzin Yeşilkent Anatolian High School
		•Hatay Education and Research Hospital
		•Mustafa Kemal University Research and Application Hospital
		•Hatay Provincial Health Directorate
		•Erzin District Health Group Presidency
	Agriculture, Livestock and Fishery	•Erzin State Hospital
		•Erzin Family Health Center
		•Hatay Provincial Directorate of Agriculture and Forestry
		•Erzin District Directorate of Agriculture and Forestry
		•Erzin Chamber of Agriculture Presidency
	Energy	•Erzin Agricultural Credit Cooperative
		•Erzin Forest Management Directorate
	Development Agency	•Hatay 53rd Branch Directorate of State Highways
		•Toroslar Elektrik Dağıtım A.Ş.
	NGOs / Cooperatives and Unions	•Doğu Akdeniz Development Agency (DOĞAKA)
		•Erzin Dört Yol Irrigation Union
		•Erzin Yeşilkent Irrigation Cooperative
		•Erzin Kültür ve Düşünce Initiative Association
		•İssos Archaeological, Cultural and Natural Heritage Protection Association
		•Erzin Environment Protection Association
•Erzin Environmental and Historical Assets Protection Association		
•Erzin Women Solidarity Association		
•Erzin Kadın Eli Cooperative		
•Turunçlu Giritliler Association		
Media	•Hatay Asi Gazetesi	
	•Hatay Söz Gazetesi	
	•Atayurt Gazetesi	
	•Özyurt Gazetesi	
	•Gazete Erzin	
	•Erzin Kent Haber	
	•Erzin'in Sesi	

## Appendix 5 Photographs taken during the meeting

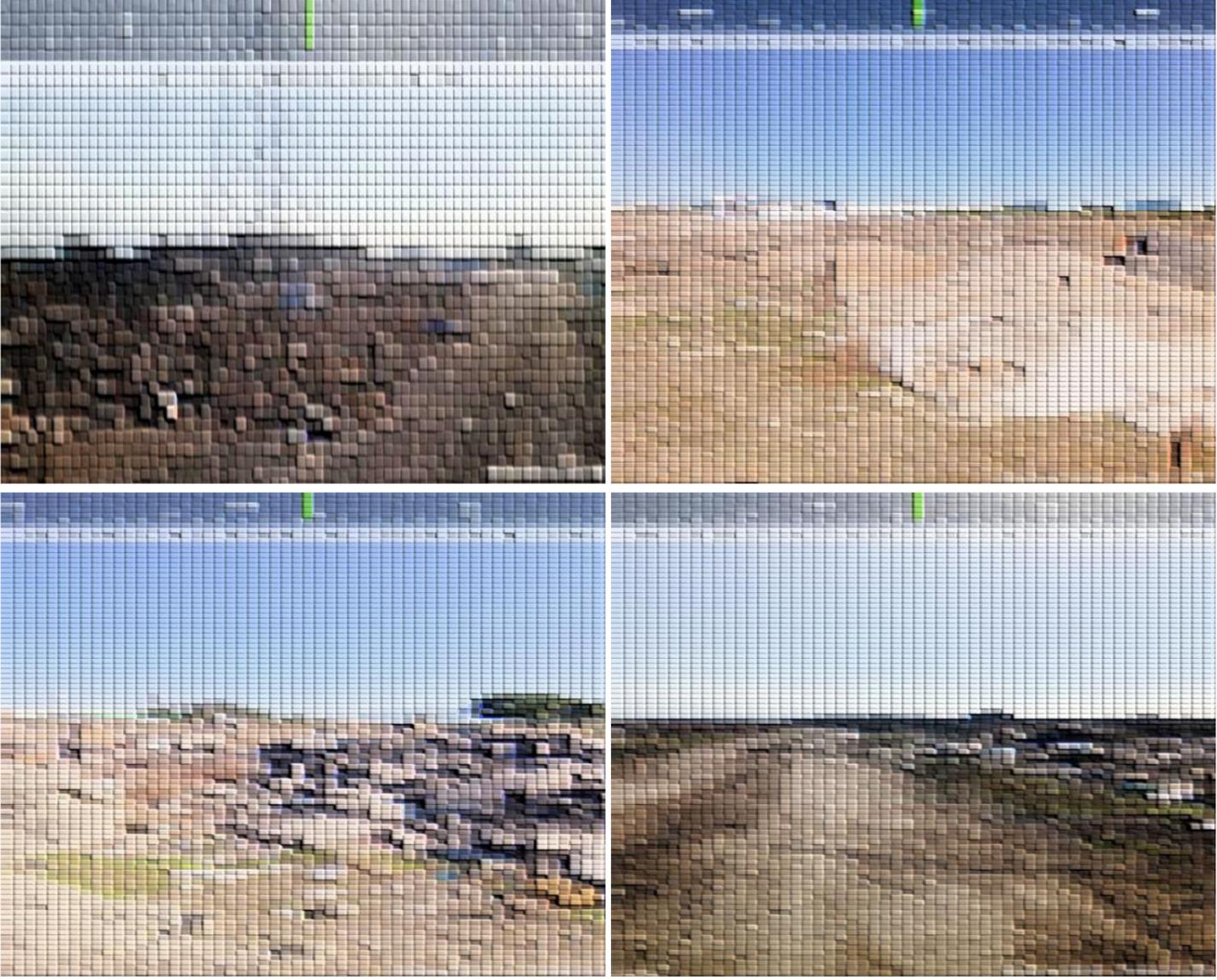
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
14.11.2024	Osmaniye / Toprakkale	Yörüks living in vicinity of the project area	Face-to-face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph	
					
14.11.2024	Osmaniye / Toprakkale	Yolbulan-Baştuğ Vocational and Technical Anatolian High School	Face-to-face Interview		

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
14.11.2024	Osmaniye / Toprakkale	Mukhtar of Büyüktüysüz Neighborhood	Face-to-face Interview	
14.11.2024	Osmaniye / Toprakkale	Osmaniye OIZ Directorate		

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
28.01.2025	Osmaniye / Toprakkale	Yörüks living in vicinity of the project area	Face-to-face Interview	 <p>The photograph column contains four images arranged in a 2x2 grid. The top-left image shows a wide view of a coastal town with a blue sea in the background. The top-right image shows a close-up of a person in a red shirt standing near a structure. The bottom-left image shows a person in a pink shirt sitting on a bench. The bottom-right image shows a person in a red shirt standing near a structure, similar to the top-right image.</p>

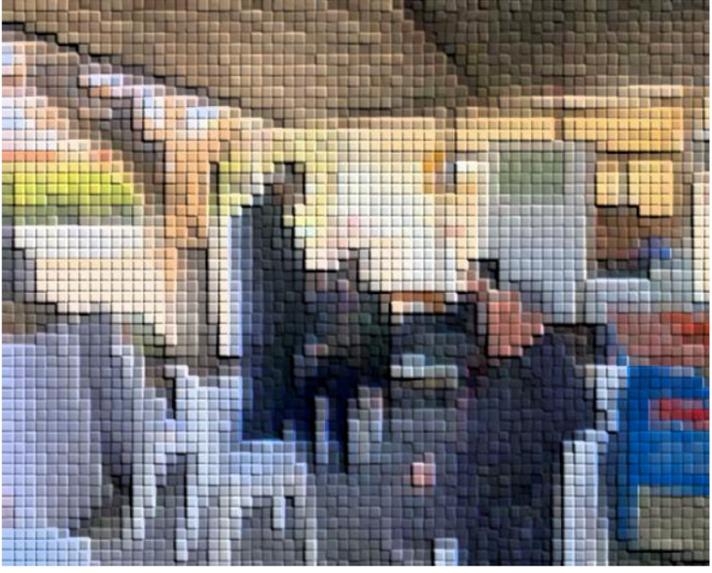
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				

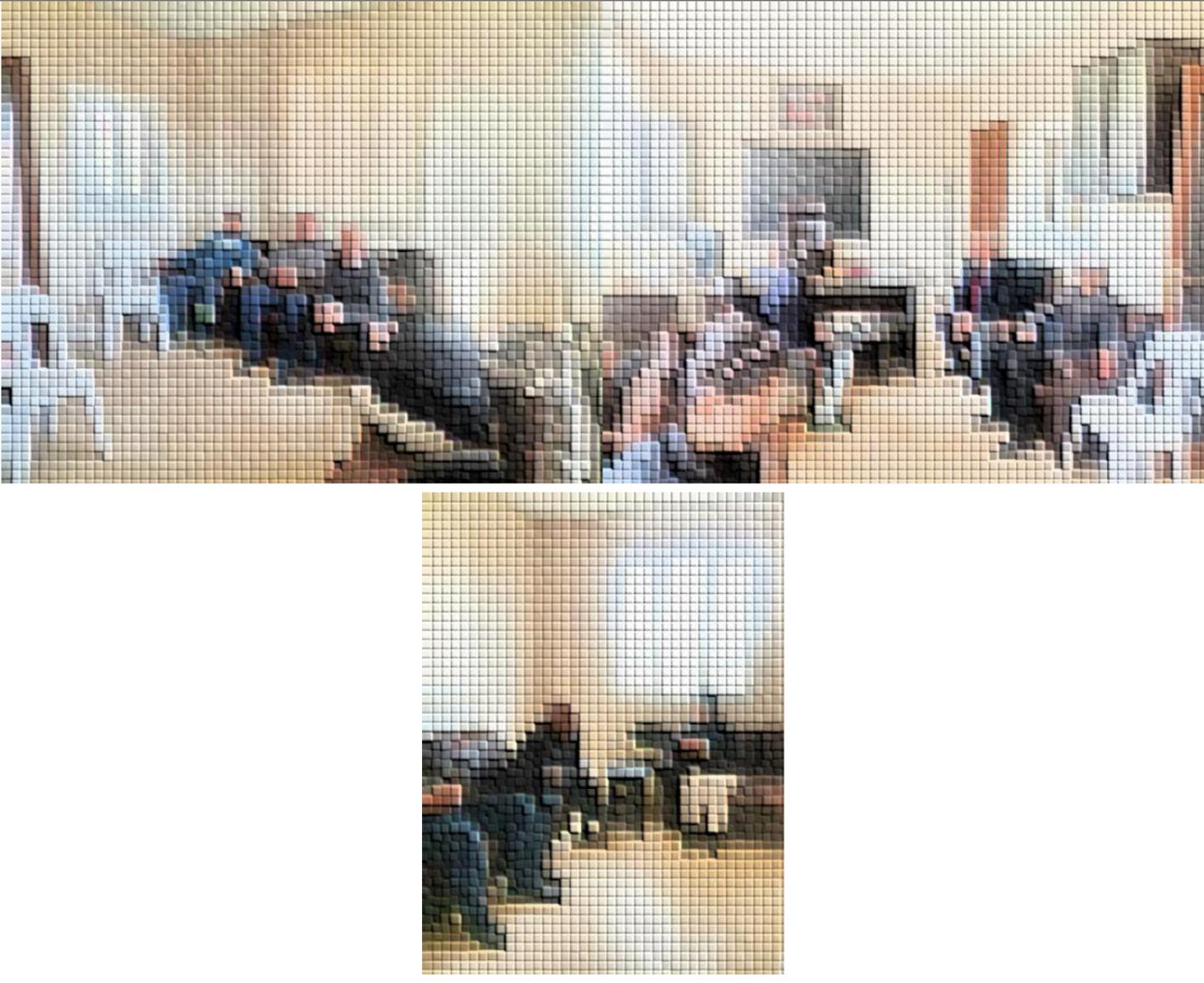
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				
26.02.2025	Osmaniye / Toprakkale Büyüktüysüz Neighborhood	Büyüktüysüz / Türkmen Neighborhood Mukhtar	Mukhtar Interview Face-to-face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
26.02.2025	Osmaniye / Toprakkale Büyüktüysüz Neighborhood	Büyüktüysüz / Türkmen Local Community	Household Interview Face-to-face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				 
27.02.2025	Hatay / Erzin Hürriyet Neighborhood	Hürriyet Neighborhood Mukhtar	Mukhtar Interview Face-to- face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
27.02.2025	Hatay / Erzin Hürriyet Neighborhood	Hürriyet Neighborhood Local Community	Household Interview Face-to- face Interview	
27.02.2025	Hatay / Erzin Turunçlu Neighborhood	Turunçlu Neighborhood Mukhtar	Mukhtar Interview Face-to- face Interview	
27.02.2025	Hatay / Erzin Turunçlu Neighborhood	Turunçlu Neighborhood Local Community	Household Interview Face-to- face Interview	
27.02.2025	Hatay / Erzin Yeşiltepe Neighborhood	Yeşiltepe Neighborhood Mukhtar	Mukhtar Interview Face-to- face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
27.02.2025	Hatay / Erzin Yeşiltepe Neighborhood	Yeşiltepe Neighborhood Local Community	Household Interview Face-to- face Interview	
27.02.2025	Osmaniye / Toprakkale	Toprakkale Municipality	Institution Interview Face to Face Interview	NA
27.02.2025	Osmaniye / Toprakkale	Toprakkale District Directorate of Agriculture and Forestry	Institution Interview Face to Face Interview	NA

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
27.02.2025	Osmaniye / Toprakkale	Toprakkale Agricultural Credit Cooperative	Institution Interview Face to Face Interview	
27.02.2025	Osmaniye / Toprakkale	Türkmen Municipality	Institution Interview Face to Face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
27.02.2025	Osmaniye / Toprakkale	Toprakkale Women's Initiative Production and Management Cooperative and Toprakkale Kilim Cooperative	NGO / Cooperative / Association Meeting Face to Face Interview	
27.02.2025	Osmaniye / Toprakkale	Toprakkale Women	Focus Group Interview Face to Face Interview	NA
27.02.2025	Hatay / Erzin	Turunçlu Giritliler Association	Focus Group Interview Face to Face Interview	NA
27.02.2025	Hatay / Erzin	Turunçlu Giritliler Association	NGO / Cooperative / Association Meeting Face to Face Interview	NA
28.02.2025	Hatay / Erzin	Erzin Municipality	Institution Interview Face to Face Interview	NA
28.02.2025	Hatay / Erzin	Erzin District Directorate of Agriculture and Forestry	Institution Interview Face to Face Interview	NA

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
28.02.2025	Hatay / Erzin	Erzin Environmental Protection Association	NGO / Cooperative / Association Meeting Face to Face Interview	
28.02.2025	Hatay / Erzin	Erzin Kadın Eli Cooperative	NGO / Cooperative / Association Meeting Face to Face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
28.02.2025	Hatay / Erzin	Erzin Yeşilkent Irrigation Cooperative	NGO / Cooperative / Association Meeting Face to Face Interview	
28.02.2025	Hatay / Erzin	Erzin Kent Haber	Media Organ Meeting Face to Face Interview	

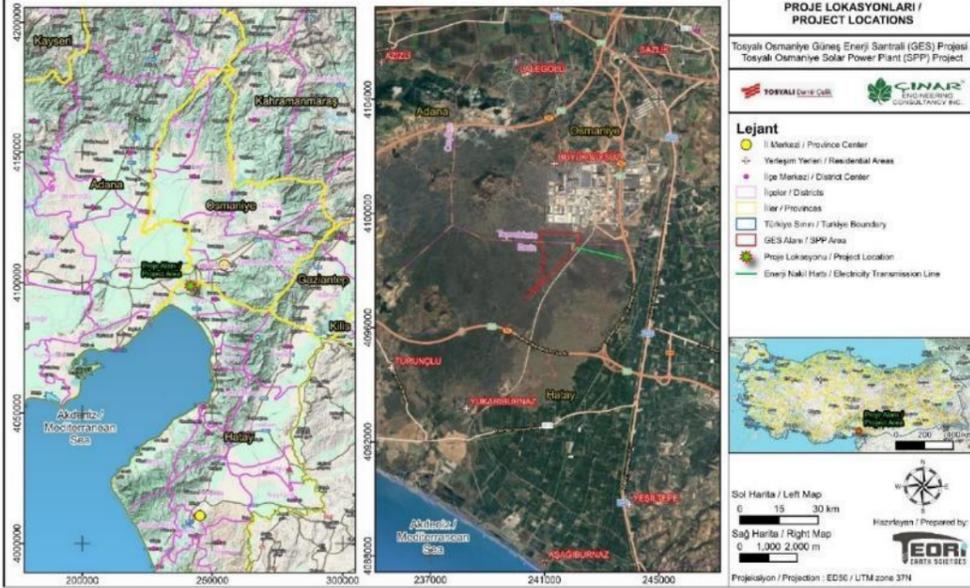
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
24.06.2025	Osmaniye Toprakkale Türkmen Town	Mukhtar of Büyüktüysüz Neighborhood and Mayor of Türkmen Town Municipality	Face-to-face Interview	
24.06.2025	Osmaniye Toprakkale	Osmaniye OIZ Directorate	Face-to-face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
24.06.2025	Osmaniye Toprakkale	Yolbulan-Baştuğ Vocational and Technical Anatolian High School	Face-to-face Interview	
12.08.2025	Osmaniye Toprakkale	Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association	NGO / Cooperative / Association Meeting Face to Face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				

## Appendix 6 Documents related to public participation meeting , 28.01.2025





**PROJE LOKASYONLARI / PROJECT LOCATIONS**

Tosyalı Osmaniye Güneş Enerji Santrali (GES) Projesi / Tosyalı Osmaniye Solar Power Plant (SPP) Project

**Lejant**

- İl Merkezi / Province Center
- Yerleşim Yerleri / Residential Areas
- İlçe Merkezi / District Center
- İlçeler / Districts
- İller / Provinces
- Türkiye Sınırı / Türkiye Boundary
- GES Alanı / SPP Area
- Proje Lokasyonu / Project Location
- Enerji Nakli Hattı / Electricity Transmission Line

Proje alanı 246/2 Nolu Parselde yer almakta olup Cebelibereket Erzin Enerji İhtisas Endüstri Bölgesi sınırları içerisindedir. Proje alanı, Lisanssız Elektrik Üretim Yönetmeliğinin 5.1.h maddesi kapsamında 02.07.2024 tarihli ve 32590 sayılı Resmî Gazete'de yayımlanan Cumhurbaşkanlığı Kararnamesi ile Yenilenebilir Enerji Kaynak Alanları'ndan (YEKA) çıkarılmıştır. 246/2 Nolu Parsel'in ön tahsisi Tosyalı'ya yapılmıştır.

Proje kapsamındaki yardımcı tesisler; 1.755 m uzunluğundaki 154 kV Elektrik İletim Hattı (EİH), geçici şantiye (işçiler için dinlenme, yemek ve mola alanı, sosyal tesisler, ofisler vb.) ve bitkisel toprak depolama alanını içermektedir. Proje alanında işçi konaklaması yapılmayacaktır.

Yapılacak EİH, Türkiye Elektrik İletim Anonim Şirketi'ne (TEİAŞ) ait mevcut 154 kV İkiizler EİH'sine bağlanacaktır.

**Proje Tanımı ve Amacı**

Tosyalı tarafından planlanan "Tosyalı Osmaniye Güneş Enerjisi Santrali (GES) Projesi (Proje)", Osmaniye İli, Toprakkale İlçesi, Türkmen/Büyüktüysüz Köyü sınırları içerisinde, 246/2 Nolu Parsel üzerinde hayata geçirilecek ve işletilecektir. Proje 147,28 hektarlık bir alanı kaplamaktadır ve toplam 120,56 MWp /88 MWe kurulu güce sahip olacak şekilde tasarlanmıştır.

Proje kapsamında; inşaat öncesi mobilizasyon ve geçici şantiye kurulum çalışmaları, arazi hazırlama çalışmaları, montaj yapıları ve güneş panellerinin montajı, şalt merkezi montajı, elektrik bağlantıları, ulusal şebeke sistemine bağlantılar ve işletmeye alma/devreye alma işlemleri gerçekleştirilecektir.

**Şikayet Mekanizması ve İrtibat Kişisi**

**Ecevit Türedi (GES SAHA MÜDÜRÜ)**  
**Cep Telefonu:** 0533680737  
**Mail Adresi:** [ges.proje@tosyaliholding.com.tr](mailto:ges.proje@tosyaliholding.com.tr)  
**Sabit Telefon:** 0216 544 36 00  
**Adres:** Barbaros, Sütçü Yolu Cd. No:72, 34746 Ataşehir/İstanbul  
**Resmî internet sayfası** <https://www.tosyaliholding.com.tr/>

## DUYURU



## Halkın Katılım Toplantısı

Tosyalı tarafından planlanan Tosyalı Osmaniye Güneş Enerjisi Santrali (GES) Projesi hakkında bilgilendirme toplantısı düzenlenecektir. Proje, Osmaniye ili Toprakkale ilçesi Türkmen/Büyüktüysüz Köyü sınırları içerisinde, 246/2 nolu parsel üzerinde yer alan 147,28 hektarlık alanda gerçekleştirilecek ve işletilecektir. Toplamda 120,56 MWp /88 MWe kurulu güce sahip olacak şekilde tasarlanan bu projeyi hakkında detaylı bilgi paylaşılacak olan toplantımıza tüm ilgililer davetlidir.

Halkımıza saygı ile duyurulur.

**Toplantı Yeri** : Osmaniye İli Toprakkale İlçesi Türkmen  
Büyüktüysüz Köyü 246 Ada 2 Parsel

**Toplantı Yerinin Adresi:** Osmaniye Organize Sanayi Bölgesi Mevkii

**Toplantı Tarihi** : 28.01.2025 Salı

**Toplantı Saati** : 12:00

**Proje Sahibi** : Tosyalı Holding

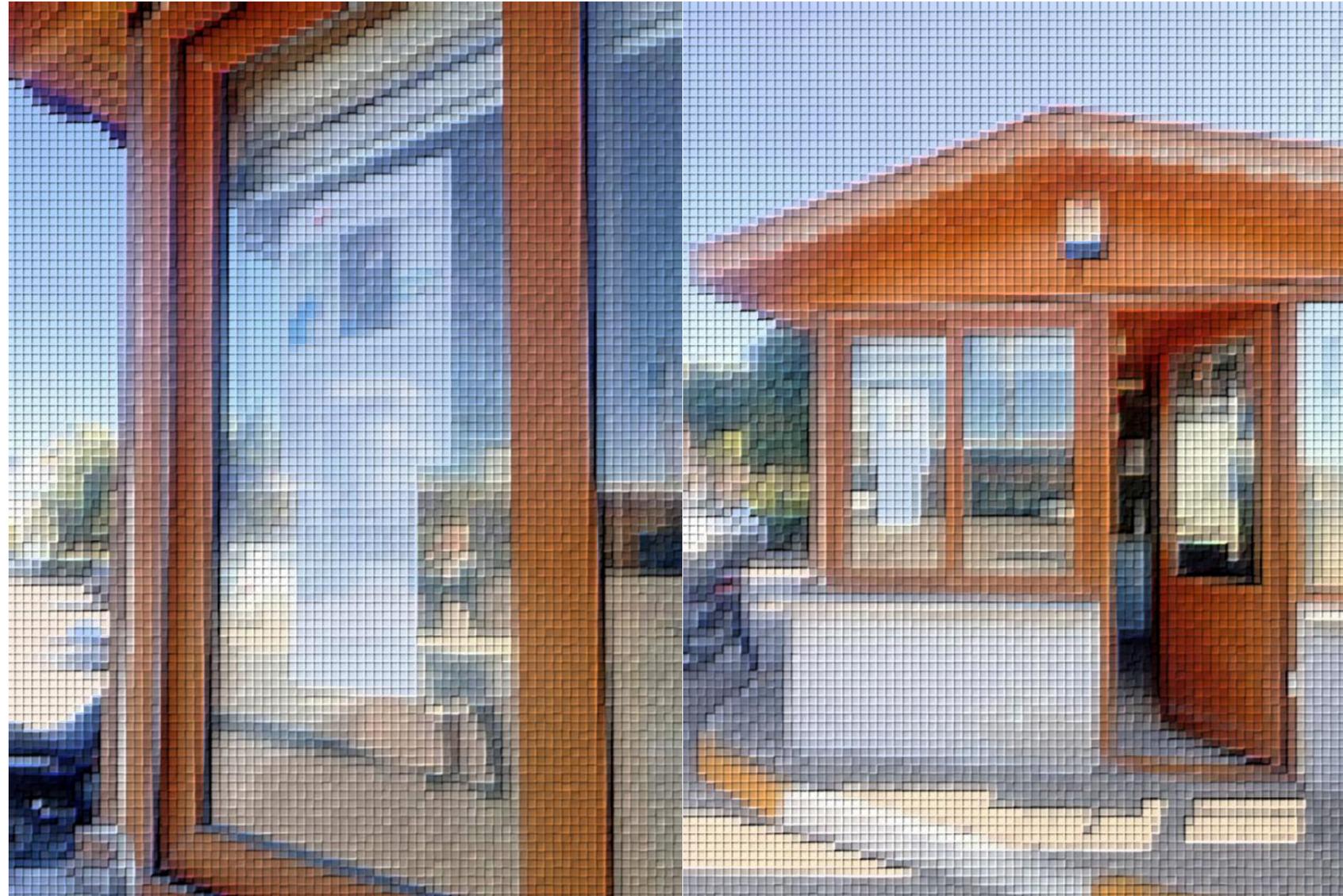
<https://www.tosyaliholding.com.tr/>

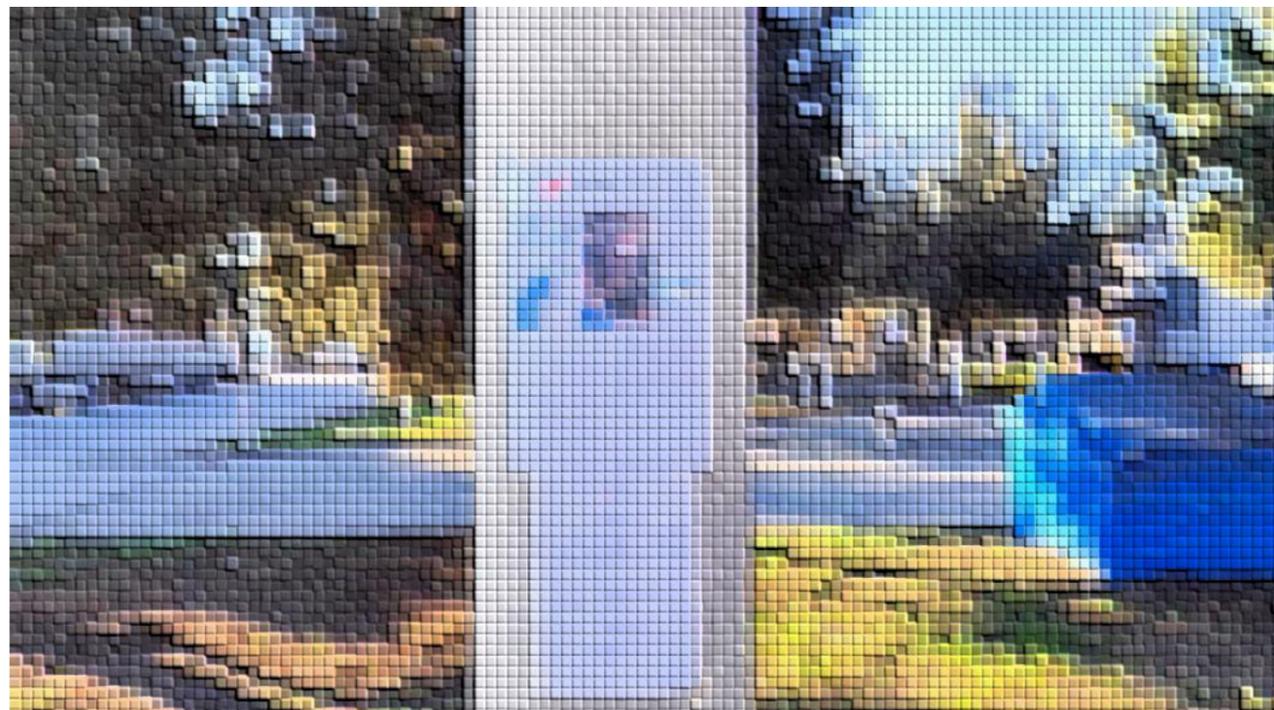
**Çevresel ve Sosyal Yönetim Dokümanlarını Hazırlayan Kuruluş:**

Çınar Mühendislik Müşavirlik A.Ş.

**Tel** : 0 (312) 472 38 39

**Faks** : 0 (312) 472 39 33









## Appendix 7 Findings of Realized Consultations &amp; Interviews

Stakeholder (Group or Individual)	Stakeholder	Date of Interview (dd.mm.yyyy)	Interview Summary	Type of Interview	Key Outcomes / Actions Identified	Follow-up Required
PAP & DVI	Yörüks living in vicinity of the project area	14.11.2024	<ul style="list-style-type: none"> <li>Yörüks have been visiting the pasturelands around the project site for at least five to nine years. During the summer, they change this temporary location to transfer another grazing areas. According the result of the interview there are approximately 500 animals belonging to the local communities around of the project area.</li> </ul>	Field Visit Face to Face Interview	Yörüks depend on local pasturelands for livestock. Awareness of number of animals and grazing patterns established.	Monitor grazing patterns Ensure pasture access during project activities.
PAP & DVI	Yolbulan-Baştuğ Vocational and Technical Anatolian High School	14.11.2024	<ul style="list-style-type: none"> <li>It is thought by the school management that there will be no problems (traffic, noise, dust, etc.) arising from the Project.</li> </ul>	Field Visit Face to Face Interview	Project impact on school is minimal No immediate mitigation required.	Periodic checks during construction to verify no issues arise
PAP Local representative	Mukhtar of Büyüktüysüz Neighborhood	14.11.2024	<ul style="list-style-type: none"> <li>The mukhtar who was interviewed is curious about how there is a relationship between the solar panels and climate change. Additionally, they would like to gather more information about the grievance mechanism.</li> </ul>	Field Visit Face to Face Interview	Provide information on solar panels, and grievance mechanism.	Share detailed project information and grievance procedures with Mukhtar.
OIP Local government bodies	Osmaniye OIZ Directorate	14.11.2024	<ul style="list-style-type: none"> <li>OIZ Directorate needs more intensive communication.</li> </ul>	Field Visit Face to Face Interview	Establish more frequent communication channels.	Plan regular updates and meetings with OIZ Directorate.
OIP Local government bodies / Project Owner	Osmaniye OIZ Directorate / Tosyalı SPP Site Manager	28.01.2025	<ul style="list-style-type: none"> <li>It has been determined that Yörük families are temporarily staying around and near the project area. Following this, a second field visit was conducted to meet with these families and gather their opinions about the process.</li> <li>On the same day, a field visit was made with the President of Osmaniye Organized Industrial Zone (OOSB). The opinions of the Yörüks were listened to, and alternative location suggestions were gathered from them. They requested that their tents be moved and properly set up at a new location. OOSB informed them that they would provide support in terms of relocation, tent setup, and the provision of materials and labor. During these discussions, no requests other than the proper setup of the tents were made. It was learned that the undertakings would not be signed until the tents were moved and completed.</li> <li>There are 3 Yörük families in the area, all of whom are engaged in animal husbandry. It was observed that trash was being dumped haphazardly in the area by unknown users. In addition to household waste, plastic, cotton remnants, and other manufactured products such as paper were also being dumped in a wild manner. It is believed that these wastes were thrown into the area haphazardly by unknown users when the Yörük left the site.</li> <li>Immediately next to the area where the trash is located, there is a school site.</li> </ul>	Field Visit / Site observations	Address Yörük relocation and tent setup	Follow up on relocation completion, tent setup
PAP & DVI	Yörüks living in vicinity of the project area / Family 1	28.01.2025	<ul style="list-style-type: none"> <li><b>Redacted pursuant to KVKK.</b></li> </ul>	Field Visit Face to Face Interview	Assess animal health risks; Plan for safe transportation in March–April.	Provide veterinary support and relocation preparation for animals.
PAP & DVI	Yörüks living in vicinity of the project area / Family 2	28.01.2025	<ul style="list-style-type: none"> <li><b>Redacted pursuant to KVKK.</b></li> </ul>	Field Visit Face to Face Interview	Prepare relocation area before animal movement; Coordinate safe winter handling.	Confirm readiness of relocation site; Schedule animal transport.
PAP & DVI	Yörüks living in vicinity of the project area / Family 3	28.01.2025	<ul style="list-style-type: none"> <li><b>Redacted pursuant to KVKK.</b></li> </ul>	Field Visit Face to Face Interview	Respect timing for relocation; Prevent stress on newborn animals.	Monitor animal welfare.
PAP Local representative	Büyüktüysüz Neighborhood Mukhtar	26.02.2025	<ul style="list-style-type: none"> <li>The number of households living in the neighborhood is 259 and the number of people is 900. The neighborhood population has not changed in the last 5 years.</li> <li>Information about the project was received at a meeting organized by the Provincial Directorate of Environment and Urbanization.</li> </ul>	Field Visit Face to Face Interview	Baseline socio-economic data collected	No

Stakeholder (Group or Individual)	Stakeholder	Date of Interview (dd.mm.yyyy)	Interview Summary	Type of Interview	Key Outcomes / Actions Identified	Follow-up Required																																											
			<ul style="list-style-type: none"> <li>No one comes/goes to work as a seasonal worker.</li> <li>There are no people of working age who cannot work because they cannot find a job.</li> <li>The main livelihoods of the settlement can be listed as construction and industrial labor, agriculture and animal husbandry.</li> <li>Agriculture activities:                             <table border="1"> <thead> <tr> <th>Products</th> <th>Quantity Produced (kg)</th> </tr> </thead> <tbody> <tr> <td>Wheat</td> <td>100,000</td> </tr> <tr> <td>Sunflower Seeds</td> <td>80,000</td> </tr> <tr> <td>Olive</td> <td>150,000</td> </tr> </tbody> </table> </li> <li>Livestock activities:                             <table border="1"> <thead> <tr> <th>Animal type</th> <th>Number of households with animals</th> <th>Total number of animals in the neighborhood</th> <th>Number of households selling animals</th> </tr> </thead> <tbody> <tr> <td>Cattle</td> <td>50</td> <td>150</td> <td>20</td> </tr> <tr> <td>Small Cattle</td> <td>5</td> <td>20</td> <td>-</td> </tr> <tr> <td>Fowl</td> <td>150</td> <td>500</td> <td>-</td> </tr> <tr> <td>Beehive</td> <td>2</td> <td>30 (hive)</td> <td>-</td> </tr> </tbody> </table> </li> <li>Animal Products:                             <table border="1"> <thead> <tr> <th>Product</th> <th>For sale</th> <th>Household consumption</th> </tr> </thead> <tbody> <tr> <td>Milk products</td> <td>Yes</td> <td>Yes</td> </tr> <tr> <td>Egg</td> <td>Yes</td> <td>Yes</td> </tr> <tr> <td>Honey</td> <td>Yes</td> <td>Yes</td> </tr> <tr> <td>Milk</td> <td>Yes</td> <td>Yes</td> </tr> </tbody> </table> </li> <li>There are experienced people who have worked in construction before.</li> <li>There are cooks, security guards, health workers, heavy vehicle operators, drivers, metal and welding masters and bricklayers in the neighborhood.</li> <li>There is no area where local people gather for festivals, celebrations or for various reasons.</li> <li>There are no known tombs, etc. in the immediate vicinity, which are sacred and visited by the public.</li> <li>There are no festivals, etc. in which the public participates.</li> <li>Folkloric practices do not continue.</li> <li>There are no cultural, ethnic or religious groups in the region.</li> <li>Sunflower seeds, wheat and olives are sold in the region. The products are also used for household consumption.</li> <li>It is supposed that the establishment of the OIZ has led to a decrease in the areas where fuel (wood) is obtained in the region.</li> </ul>	Products	Quantity Produced (kg)	Wheat	100,000	Sunflower Seeds	80,000	Olive	150,000	Animal type	Number of households with animals	Total number of animals in the neighborhood	Number of households selling animals	Cattle	50	150	20	Small Cattle	5	20	-	Fowl	150	500	-	Beehive	2	30 (hive)	-	Product	For sale	Household consumption	Milk products	Yes	Yes	Egg	Yes	Yes	Honey	Yes	Yes	Milk	Yes	Yes			
Products	Quantity Produced (kg)																																																
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Honey	Yes	Yes																																															
Milk	Yes	Yes																																															
PAP Local representative	Hürriyet Neighborhood Mukhtar	27.02.2025	<ul style="list-style-type: none"> <li>The number of households living in the neighborhood permanently is 1,600 and the number of people is 4,670. In summer, the number of households is 2,000 and the population increases up to 6700. The neighborhood population has not changed in the last 5 years.</li> <li>Information about the project was received from the Provincial Directorate of Agriculture.</li> <li>No one goes to work as seasonal laborers. People from Diyarbakır, Osmaniye, Kahramanmaraş and Syria come to the region as seasonal workers. It was informed that they usually come to work in citrus fruits between October and January. An average of 2000 people come annually, 50% of whom are women and 35% are children under the age of 16.</li> <li>There are 150 people of working age who cannot work because they cannot find a job.</li> <li>The main livelihoods of the settlement can be listed as agriculture, construction and industrial labor and animal husbandry.</li> <li>Agriculture activities:                             <table border="1"> <thead> <tr> <th>Products</th> <th>Quantity Produced (kg)</th> </tr> </thead> <tbody> <tr> <td>Citrus</td> <td>480,000</td> </tr> </tbody> </table> </li> </ul>	Products	Quantity Produced (kg)	Citrus	480,000	Field Visit Face to Face Interview	Document seasonal worker patterns and cultural practices.	Ensure project does not disrupt cultural events; Monitor local employment.																																							
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PAP Local representative	Turunçlu Neighborhood Mukhtar	27.02.2025	<ul style="list-style-type: none"> <li>The number of households living in the neighborhood is 230 and the number of people is 1000. In summer, the number of households is 350 and the population increases up to 1750. The population of the neighborhood has increased in the last 5 years, especially after the earthquake. In addition, people who migrated abroad settled in the neighborhood again after their retirement.</li> <li>Information about the project was received from the District Directorate of Agriculture.</li> <li>No one comes/goes to work as a seasonal worker.</li> <li>There are 10 people who are of working age but cannot work because they cannot find a job.</li> <li>The main livelihoods of the settlement can be listed as agriculture, animal husbandry and pensions.</li> <li>Agriculture activities: <table border="1"> <thead> <tr> <th>Products</th> <th>Quantity Produced (kg)</th> </tr> </thead> <tbody> <tr> <td>Wheat</td> <td>2,000,000</td> </tr> <tr> <td>Olive</td> <td>1,400,000</td> </tr> </tbody> </table> </li> <li>Livestock activities: <table border="1"> <thead> <tr> <th>Animal type</th> <th>Number of households with animals</th> <th>Total number of animals in the neighborhood</th> <th>Number of households selling animals</th> </tr> </thead> <tbody> <tr> <td>Cattle</td> <td>5</td> <td>20</td> <td>-</td> </tr> </tbody> </table> </li> </ul>	Products	Quantity Produced (kg)	Wheat	2,000,000	Olive	1,400,000	Animal type	Number of households with animals	Total number of animals in the neighborhood	Number of households selling animals	Cattle	5	20	-	Field Visit Face to Face Interview	Identify pasture areas	Engage in land use planning																			
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PAP Local representative	Yeşiltepe Neighborhood Mukhtar	27.02.2025	<ul style="list-style-type: none"> <li>The number of households living in the neighborhood is 450 and the number of people is 1260. In summer, the number of households is 400 and the population increases up to 1000. The population of the neighborhood has decreased in the last 5 years, although not drastically, as the tenants engaged in agriculture have left.</li> <li>Information about the project was received from District Governorate meetings.</li> <li>No one goes to work as a seasonal worker. Seasonal workers come to the region from Kahramanmaraş, Şanlıurfa and Diyarbakır. It was informed that they usually come to work in citrus fruits between October and January. An average of 200 people come annually and 50% of them are women and 30% are children under 16 years of age.</li> <li>There are 50 people of working age who cannot work because they cannot find a job.</li> <li>The main sources of livelihood in the settlement are agriculture, construction and industrial labor and pensions.</li> <li>Agriculture activities: <table border="1"> <thead> <tr> <th>Products</th> <th>Quantity Produced (kg)</th> </tr> </thead> <tbody> <tr> <td>Citrus</td> <td>300,000,000</td> </tr> <tr> <td>Olive</td> <td>100,000</td> </tr> </tbody> </table> </li> <li>Livestock activities: <table border="1"> <thead> <tr> <th>Animal type</th> <th>Number of households with animals</th> <th>Total number of animals in the neighborhood</th> <th>Number of households selling animals</th> </tr> </thead> <tbody> <tr> <td>Cattle</td> <td>10</td> <td>50</td> <td>-</td> </tr> <tr> <td>Small Cattle</td> <td>5</td> <td>200</td> <td>5</td> </tr> <tr> <td>Fowl</td> <td>400</td> <td>2,000</td> <td>-</td> </tr> <tr> <td>Beehive</td> <td>3</td> <td>150</td> <td>-</td> </tr> </tbody> </table> </li> <li>Animal Products:</li> </ul>	Products	Quantity Produced (kg)	Citrus	300,000,000	Olive	100,000	Animal type	Number of households with animals	Total number of animals in the neighborhood	Number of households selling animals	Cattle	10	50	-	Small Cattle	5	200	5	Fowl	400	2,000	-	Beehive	3	150	-	Field Visit Face to Face Interview	Agricultural training required; Support women's cooperative activities	Organize training and support programs	
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OIP Local government bodies	Toprakkale Municipality	27.02.2025	<ul style="list-style-type: none"> <li>Information about the project was received with the permission letter sent for the power lines.</li> <li>It was stated that official letters, announcements and social media can be used to inform about the project.</li> <li>It was stated that the project would not have a negative impact on the municipality, could provide employment and would have a positive impact in terms of electricity savings.</li> <li>If any pollution is caused in the region, especially on the Büyüktüysüz side, there will be a negative situation, so it is recommended to take measures for dust and air pollution.</li> <li>It was stated that there is an odor problem because the municipality does not have a treatment plant and that a joint project could be carried out in this regard. In addition, air pollution may also occur as some companies do not use filters.</li> <li>It was emphasized that special attention should be paid to pollution, and measures should be taken especially for dust. It was stated that the dust problem also affects agricultural activities, which is one of the livelihoods of the region.</li> </ul>	Field Visit Face to Face Interview	Dust and pollution mitigation required	Implement dust control measures												
OIP Local government bodies	Toprakkale District Directorate of Agriculture and Forestry	27.02.2025	<ul style="list-style-type: none"> <li>Partial information was received about the project.</li> <li>It was stated that official correspondence could be used to inform about the project.</li> <li>It was stated that SPP projects are intensive in the region and are harmless in terms of energy production. It is also considered positive in terms of creating employment.</li> <li>The proximity of industrial areas and residential areas causes concerns among the local population regarding issues such as product yield. Some farmers have requested that these concerns be investigated and reported.</li> <li>In order to mitigate the negative impacts of the project, it has been proposed to reduce dust, to impose filtering requirements on factory chimneys and to separate the perimeter of the OIZ from agricultural areas with a wall.</li> </ul>	Field Visit Face to Face Interview	Reduce dust	Monitor air quality												
OIP	Toprakkale Agricultural Credit Cooperative	27.02.2025	<ul style="list-style-type: none"> <li>No information was received about the project.</li> <li>It is considered that the Project will benefit the Project owner company and the region in terms of employment opportunities.</li> <li>It was stated that there is a contraction in agricultural areas in the region and livestock breeding activities continue. It was stated that farmers earn income through land sales.</li> </ul>	Field Visit Face to Face Interview	Communicate project information; Support cooperative financially.	Schedule info sessions; Assess impact on agriculture.												
OIP Local government bodies	Türkmen Municipality	27.02.2025	<ul style="list-style-type: none"> <li>Information was received from Tosyalı Holding about the project.</li> <li>It was stated that industrial activities gain weight in the region rather than agriculture and animal husbandry.</li> <li>It was stated that the Municipality would not be able to receive any electricity share after Tosyalı Holding started generating its own electricity.</li> <li>It was stated that the decrease in pasture areas would negatively affect families engaged in animal husbandry. In order to prevent this situation, it was suggested that the remaining pasture areas should be improved, and alternative pasture areas should be created.</li> <li>It has been reported that project activities will reduce livestock production and will have a negative impact on agricultural activities if the climate changes.</li> </ul>	Field Visit Face to Face Interview	Alternative pasture areas; Mitigate negative impact on livestock.	Coordinate pasture improvement and alternative sites for animal husbandry.												
OIP & DVIG	Toprakkale Women's Initiative Production and	27.02.2025	<ul style="list-style-type: none"> <li>Partial information about the project was received from the District Governorate.</li> <li>It was stated that meetings could be organized, and social media could be used to inform about the project.</li> </ul>	Field Visit	Support cooperatives; Clarify misinformation;	Organize information sessions;												

Stakeholder (Group or Individual)	Stakeholder	Date of Interview (dd.mm.yyyy)	Interview Summary	Type of Interview	Key Outcomes / Actions Identified	Follow-up Required
NGO / Cooperatives / Associations	Business Cooperative and Toprakkale Kilim Cooperative		<ul style="list-style-type: none"> <li>It was stated that there are frequent power cuts in Toprakkale, and that the realization of this Project could be beneficial for the region if it could be a solution to power cuts. It was emphasized that they need to be supported as a cooperative and that the cooperation of the Project company with the cooperative would benefit the women in the region. In addition, the Project could have a positive impact in terms of employment.</li> <li>There are rumors that the electricity generated by SPP emits radiation and increases the temperature, but there is no detailed information on the subject.</li> <li>It was emphasized that air pollution is intense in the region and that measures should be taken.</li> <li>It was emphasized that cooperative activities would not be affected by the Project, but that the Project company should cooperate with the cooperative to ensure a positive contribution.</li> </ul>	Face to Face Interview	Improve employment. local	Provide employment support; Monitor project impacts.
OIP	Toprakkale Women	27.02.2025	<ul style="list-style-type: none"> <li>It was stated that there are rumors that SPP projects emit radiation and increase the temperature, but there is no definite information. It was stated that if the electricity generated will support the region, it will be positive for the region because there are frequent power cuts in the region. In addition, it was emphasized that the region should be supported in terms of employment.</li> <li>It was stated that one of the main problems for women in the region is the inclusion of women in production. It was stated that by supporting cooperatives, more women will be reached. It was emphasized that when cooperatives are supported, women will have financial power, which will increase participation in cooperatives.</li> <li>It was suggested that cooperation is very important, and women should be supported. It was emphasized that women are the ones who suffer the most from power cuts.</li> <li>It was said that everyone in the region would be affected by the negative impacts of SPPs.</li> <li>It was said that clean energy is emphasized for SPP, but there are also rumors about negative impacts. The importance of the authorities providing information was emphasized.</li> <li>If the energy is cleaner and the people of the region will benefit from the energy obtained, it will be beneficial for the region.</li> <li>One of the main problems is that women do not have the opportunity to earn economic income and support the household while working and producing voluntarily, childcare is a major problem for mothers with young children, while women with school-going children have difficulties in time management. Therefore, it was emphasized that women should have the opportunity to work closer to home and supportive solutions for childcare should be developed.</li> <li>It was stated that it would be positive for the region if employment opportunities increased.</li> <li>It was suggested that women's initiatives in the region should be supported even if women are not employed within the scope of SPP.</li> <li>It was stated that women want to earn a small income and contribute to the household by participating in production. It was stated that they could work after dropping their children off at school and that it was a great opportunity to have a workshop close to home where they could both learn and produce together. It was emphasized that many women are interested in such opportunities, but the support and opportunities are insufficient.</li> </ul>	Field Visit Focus Group Interview	Provide income-generating opportunities close to home; Support childcare solutions.	Develop women-focused programs; Monitor participation and satisfaction.
OIP	Turuçlu Giritliler Association	27.02.2025	<ul style="list-style-type: none"> <li>The conservation of the decreasing green areas in the region was emphasized in terms of the continuation of agricultural and livestock activities. They prefer that the existing green areas be used for agriculture and livestock.</li> <li>There is an area in the region where the Yörükler Festival is held, and the presence of shepherd caves, arches, and wells in the surroundings has been mentioned. Concerns about the future of livestock activities in the region have been raised due to the narrowing of land use. It has been conveyed that the local people have officially expressed themselves by collecting signatures against projects they do not approve.</li> <li>It has been conveyed that pasture areas need to be preserved for livestock in the region. It has been communicated that individuals whose only source of livelihood is agriculture and livestock are sensitive about pasture areas.</li> </ul>	Field Visit Focus Group Interview	Protect pasture and green areas; Involve community in land-use decisions.	Monitor project adherence to pasture conservation; Maintain community consultation.

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OIP NGO / Cooperatives / Associations	Turunçlu Giritliler Association	27.02.2025	<ul style="list-style-type: none"> <li>Information about the project was obtained through the District Directorate of Agriculture and Forestry.</li> <li>It was suggested that one-on-one meetings should be held to inform about the project.</li> <li>It is supposed that investments in the region generally restrict pasture areas. These restrictions are associated with climate change.</li> <li>The fact that the local people are engaged in livestock farming has created sensitivity regarding the grazing areas in the region.</li> <li>Whether in the vicinity or not, the region's olive trees, laurel trees, and St. John's wort are considered important, and they want these plants to be preserved under all circumstances.</li> <li>In general, industrial areas are considered risky for agriculture and livestock, which are the main sources of livelihood for the people.</li> </ul>	Field Visit Face to Face Interview	Ensure preservation of important plant species; Manage industrial impact.	Conduct environmental assessment; Implement protective measures.
OIP Local government bodies	Erzin Municipality	28.02.2025	<ul style="list-style-type: none"> <li>Information was received about the project.</li> <li>It was stated that the official letter method could be used for informing about the project.</li> <li>It is supposed that industrial investments hinder the development of livestock activities.</li> <li>It has been assumed that sensitive agricultural products, such as olives, are affected by industrial investments.</li> <li>Although investments are generally thought to create employment, it has been said that the contribution to the local population's employment is low because companies provide short-term employment.</li> <li>In this sense, the municipality also cannot benefit from the investments.</li> <li>As a recommendation, it has been stated that, first, the local people need to know the impact of the project on the ecosystem. Secondly, it has been suggested that alternative areas for livestock breeding should be identified.</li> </ul>	Field Visit Face to Face Interview	Provide project impact information; Identify alternative livestock areas.	Conduct awareness and land-use planning sessions.
OIP Local government bodies	Erzin District Directorate of Agriculture and Forestry	28.02.2025	<ul style="list-style-type: none"> <li>Information was received about the project. The process of renting the pasture area is carried out through the District Directorate of Agriculture and Forestry.</li> <li>It was stated that official correspondence could be used to inform about the project.</li> <li>According to environmental information, glass and metal collect heat. It is not known how much this will affect the climate. It was stated that there is a need for research on the impact on agriculture.</li> <li>Since livestock activities will be restricted, the needs of people living on livestock need to be met. There are also Yörük tents in the vicinity. It was stated that their routines should not be harmed.</li> <li>It was emphasized that livestock breeders should be supported. It was stated that there is no water in the region and agricultural activities are carried out with transported water and that support should be provided for this problem. Making pasture roads usable and protecting Yörük tents are among the suggestions.</li> <li>Since the cost of water drawn from the well is very high, it was suggested that Tosyalı should support the cooperative with a small portion of the cost of energy or a small panel system should be installed for the cooperative.</li> </ul>	Field Visit Face to Face Interview	Support livestock breeders; Provide water and energy assistance	Implement support measures; Monitor livestock and water usage
OIP NGO / Cooperatives / Associations	Erzin Environmental Protection Association	28.02.2025	<ul style="list-style-type: none"> <li>Information about the project was received.</li> <li>It was stated that social media could be used to inform about the project and that information meetings could be organized.</li> <li>There are concerns about the preservation of the region's pastures.</li> <li>The area also contains pastures, water caves, and archaeological sites. There are concerns about the future of pastures and irrigation areas, and worries about livestock farmers facing difficulties.</li> </ul>	Field Visit Face to Face Interview	Protect pastures, water, and cultural sites.	Ensure environmental monitoring; Community engagement on protection measures.
OIP & DVI NGO / Cooperatives / Associations	Erzin Kadın Eli Cooperative	28.02.2025	<ul style="list-style-type: none"> <li>Information about the project was received through Whatsapp groups.</li> <li>It was stated that social media could be used to inform about the project.</li> <li>It was emphasized that projects should be built in places open to industry, not in nature areas.</li> <li>It was stated that such projects damage nature and limit the range of products in the region. It was emphasized that the region has important soils for citrus fruits and is not suitable for such projects.</li> <li>The Project is evaluated negatively as it restricts the areas where agriculture and animal husbandry activities can be carried out.</li> </ul>	Field Visit Face to Face Interview	Avoid sensitive natural areas; Provide alternative sites for production.	Guide project planning to prevent negative impact on natural areas.
OIP NGO / Cooperatives / Associations	Erzin Yeşilkent Irrigation Cooperative	28.02.2025	<ul style="list-style-type: none"> <li>Partial information was received about the project.</li> <li>It was stated that meetings could be organized to inform about the project.</li> <li>The exact benefits and harms of the project are not fully known. Concerns have been raised about the work due to the region being a water basin. Additionally, there are historical monuments in the region. There are concerns that the project may affect the air and temperature. It was also suggested that there are pastures and protected areas in the region, and these areas should be especially protected.</li> <li>It is considered that the project activities will not benefit the people of the region, farmers and those engaged in animal husbandry.</li> <li>There are concerns about the protection of wells and groundwater resources.</li> </ul>	Field Visit Face to Face Interview	Protect water and pasture areas; Clarify project benefits.	Provide information environmental measures.
OIP	Erzin Kent Haber	28.02.2025	<ul style="list-style-type: none"> <li>Information was received about the project.</li> </ul>	Field Visit	Increase transparency;	Conduct community awareness campaigns;

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Media organ			<ul style="list-style-type: none"> <li>It was stated that social media could be used to inform about the project and that information meetings could be organized.</li> <li>It was stated that SPP projects are not as harmful as thermal power plants etc., but the effects of spreading over a large area are not known. It was stated that there are underground water resources and water basins in the Leçe region and it is important to carry out studies on how it will affect these areas.</li> <li>It has been suggested that there will be limited employment within the scope of the project, and that the people of the region should be employed in different positions other than security personnel.</li> <li>It was suggested that the region should be supported, the number and quality of employment should be increased, and the question marks in people's minds should be eliminated through analysis.</li> <li>It was suggested that the region should be supported, the number and quality of employment should be increased and analyzes should be conducted.</li> <li>It was informed that there are water resources and a protected area in the region. It was emphasized that the sources should be disturbed in line with the ecological balance.</li> <li>It was stated that pasture and water resources are in the region and if adequate measures are not taken, it will restrict livestock activities.</li> </ul>	Face to Face Interview	Enhance employment; Protect water and ecological resources.	Monitor ecological impact.
PAP Local representative	Mukhtar of Büyüktüysüz Neighborhood and Mayor of Türkmen Town Municipality	24.06.2025	<ul style="list-style-type: none"> <li>The residents' primary complaints relate to facilities that generate dust. Discussions regarding the status of these facilities are ongoing.</li> <li>There are additional concerns regarding the reduction of agricultural and grazing areas.</li> <li>Dissatisfaction exists due to the Organized Industrial Zone (OSB) having expanded up to the residential boundaries.</li> <li>Livestock farming has ceased in the village since the establishment of the OSB.</li> <li>There are cancer patients in the village. Residents are troubled by dust. Citizens suggested organizing a march to the police station and the OSB to address facilities generating dust.</li> <li>It is reported that the cement factory may also close.</li> <li>Complaints have been formally submitted to the Provincial Environmental Directorate and the Provincial Health Directorate regarding dust, and a solution is awaited.</li> <li>Authorities intend to acquire the agricultural lands currently held by villagers to incorporate them into the OSB.</li> <li>Facilities are located along the highway. There is a Type-T Prison. Within one year, three facilities were approved at the Erzin boundary.</li> </ul>	Field Visit Face to Face Interview	Address dust and pollution complaints; Assess land acquisition impact; Monitor health and agricultural impacts.	Follow up on dust mitigation, land acquisition procedures, and community health concerns.
OIP Local government bodies	Osmaniye OIZ Directorate	24.06.2025	<ul style="list-style-type: none"> <li>Residents have expressed complaints regarding emissions from chimneys.</li> <li>Improvement measures to address pollution are being implemented.</li> <li>As an institution, a tree-planting buffer zone has been designated along the boundary of Türkmen Town; however, it has not yet been put into operation.</li> </ul>	Field Visit	Implement pollution control	Monitor pollution reduction
PAP & DVI	Yolbulan-Baştuğ Vocational and Technical Anatolian High School	24.06.2025	<ul style="list-style-type: none"> <li>There are 327 registered students. Additionally, 137 students attend MESEM, coming to school one day per week while working in the OSB on other weekdays. Students are generally aged 14–15, while MESEM also includes Syrian students over 30.</li> <li>The boarding facility accommodates 120 students. Study hours are provided, but no formal education takes place during these periods.</li> <li>Weekday school hours are from 08:00 to 16:00.</li> <li>MESEM schedules are arranged to avoid overlap with the regular school, operating from 08:00 to 17:00.</li> <li>Approximately 180 students use the transportation system, served by a total of 12 buses.</li> <li>No issues have been reported regarding school traffic, and there are no safety risks for students.</li> <li>Due to the school's location, there are no concerns related to odors, noise, or dust.</li> <li>In Grade 12, students participate in vocational training. Around 10 students in the Automation Unit could potentially be considered for internships, specifically in mechatronics and control systems. The school hosts the region's only automation system. Coordination with HR could be explored.</li> <li>This is the school's most valuable section, consisting of intelligent and well-behaved students. Currently, students are in Grades 9, 10, and 11; Grade 12 will be established for the first time this year. If these students can undertake internships, student enrollment in the department is likely to continue. Teachers are highly qualified and well-equipped.</li> </ul>	Field Visit Face to Face Interview	Confirm no impact on students; Internship opportunities in automation unit.	Follow up on potential internship placements; Ensure ongoing safety monitoring.
OIP NGO / Cooperatives / Associations	Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association	12.08.2025	<ul style="list-style-type: none"> <li>A meeting was held at the association building in Osmaniye/Toprakkale with the presidents and vice presidents of the Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association. A total of eight participants attended the meeting, including the association leaders, their vice presidents, the ÇINAR team, and the Tosyalı team. When asked about institutions, organizations, or associations that could be consulted regarding the Yörüks, it was stated that the Yörük Türkmen Foundation (YÖKTÜRK) headquarters in Ankara does not have a direct connection with the region, whereas the Turkey Türkiye Yörük Türkmen Federation is more widely recognized locally.</li> </ul>	Field Visit Face to Face Interview	Document Yörük cultural practices; Consider consultation in project decision-making;	Maintain engagement with Yörük associations; Monitor cultural and livelihood impacts.

Stakeholder (Group or Individual)	Stakeholder	Date of Interview (dd.mm.yyyy)	Interview Summary	Type of Interview	Key Outcomes / Actions Identified	Follow-up Required
			<ul style="list-style-type: none"> <li>During the meetings held with the Toprakkale Yörük Turkmen Association and the Osmaniye Yörük-Turkmen Association, questions were asked on issues such as the living conditions of Yörüks, the main challenges they face, the impacts of surrounding facilities, the state of cultural activities, relations with associations, and expectations for the future. The association presidents stated that the main problems faced by Yörüks living in the region include the lack of pastures and grazing lands, the non-allocation of forest areas, settlement issues, and the lack of basic infrastructure services such as water and electricity.</li> <li>It was emphasized that Yörüks, who sustain their livelihoods through traditional livestock breeding, are forced to turn to alternative income sources due to the shrinking of these areas and difficulties in accessing resources. Industrial facilities operating in the region directly affect the living areas of Yörüks, which in turn causes changes in their lifestyle. It was expressed that risks may increase in areas overlapping with projects such as solar power plants; therefore, in such projects, Yörüks should be directly consulted during decision-making processes, and progress should be made without disrupting their existing way of life.</li> <li>It was noted that Yörüks maintain this lifestyle under challenging conditions, and that improving their opportunities would enhance both their living standards and cultural continuity. It was further indicated that while there is communication with companies and no direct complaints have been received against them, Yörüks maintain relations with associations, follow these institutions on social media, and although there are approximately 156,000 Yörüks in Osmaniye, only 300–400 people continue the traditional lifestyle.</li> <li>In addition, it was reported that each year in October, after the return from the highlands, a large-scale festival called “Yörük-Turkmen Gatherings” is organized, featuring performances by local artists, troubadours, and folk dance groups, along with the offering of traditional dishes. It was also shared that, alongside livestock breeding, weaving is still practiced by some Yörük groups.</li> <li>Yörük Turkmen Association and the Osmaniye Yörük Turkmen Association also compiled information on the intangible cultural heritage elements of the Yörüks. The following findings, presented in a question-and-answer format, constitute a summary of this meeting.</li> <li>Is the area where the Project is located a place where local people gather for festivals, celebrations, or other purposes? Yörük festivals were held 10–15 years ago. Currently, festivals have been organized in the stadium for the past 15 years.</li> <li>Are there any known tombs, shrines, or other sacred sites in the vicinity that are visited by the public? If such sites exist, are they near the Project area or affected by the Project? Süleyman Dede Tomb (Toprakkale, Askeriye Üstü, Karataş Neighborhood).</li> <li>Are there festivals attended by the local population? If festivals are held, are they organized in provincial/district centers? What types of festivals are these? Do performers such as singers participate? Do people attend to showcase and/or sell products? Yörük-Türkmen gatherings are held in October, after the return from the highland pastures. Festivals take place in the stadium with performances by singers, local bards, aşık performers, mehter bands, and folk dance groups. Traditional dishes such as kavurma, sıkma, and börek are served. About 60 women participate in food preparation, and some events are sponsored.</li> <li>Do folkloric practices common in Anatolia—such as bride-seeking rituals, placing the bride on a horse, fasting during Ramadan, collective iftars, men gathering separately at weddings, Hıdırellez, spring festival celebrations, or burying wishes under rose trees—continue? If so, which ones? Are there additional traditional practices specific to your community? Bride-seeking rituals, fasting, collective iftars (community meals), and festivals continue. Previously, brides would arrive on camels and light the tent fire; now these old customs are only performed during festivals. Currently, flag-raising ceremonies occur, meals are served from Friday, rams are sacrificed, and dishes such as kavurma, pilav, and desserts are prepared and distributed. Weddings begin Friday at noon and end Sunday, lasting three days. When entering the house, the bride’s mother-in-law scatters rice.</li> <li>For how many generations has your community lived in this region? Yörüks were present before the Republic. Initial settlements date back to 1944. They moved to the Aydın region in 1918 and returned to the Osmaniye area in the 1960s. Turkish Identity cards were issued to Yörüks in 1934.</li> <li>Do you still practice traditional Yörük rituals, holidays, or celebrations today? (For example, migration onset, highland migration, wedding rituals, etc.) Festivals continue. The migration fire is lit in April when flowers bloom. Highland stays last until the end of August. Customs such as tying horse tails and wearing colored keyfiyes are maintained.</li> <li>Are traditional handicrafts (felt, kilim, weaving, copperwork, etc.) still practiced within families? Chuls (rug-like mats) are made from goat hair.</li> <li>Do you still maintain the traditional Yörük tent culture (goat-hair tents, obas), or have you transitioned to more modern forms of housing? Obas exist, but goat-hair tents do not. However, the culture continues.</li> </ul>		<p>Support cultural preservation.</p>	

Stakeholder (Group or Individual)	Stakeholder	Date of Interview (dd.mm.yyyy)	Interview Summary	Type of Interview	Key Outcomes / Actions Identified	Follow-up Required
			<ul style="list-style-type: none"> <li>Are there sacred sites, shrines, or visited places along your highland and migration routes? Are they related to the Project area? There are no such sites along the migration route, but mountains and forests are considered sacred.</li> <li>Are folk tales, ditties, laments, folk songs, or lullabies still preserved within families? They exist in some villages and larger families, including areas of Osmaniye Toprakkale such as Aslanpınarı, Sayık, and Tüysüz.</li> <li>Will the planned Project in the region affect your traditional migration routes or highlands? It will not.</li> <li>Could Project activities negatively impact your traditional production methods (livestock raising, handicrafts, migration)? Our sacred areas are forests and mountains. As long as forests are not damaged, there is no issue. Yörüks do not have grazing rights; no risks or damages are anticipated.</li> <li>Do you still use handicrafts as a source of income? Weaving and the production of souvenirs continue. There is a necklace-like souvenir called "Çıtlık".</li> <li>Do you have any requests to the Project owners regarding the protection of your cultural heritage? Requests include support for the festival, creation of employment, and ensuring that Yörüks are not disadvantaged.</li> <li>Are there cultural heritage sites related to your ancestors, such as graves, sacred trees, stones, or fountains? There are highland pastures and graves, but no other sites.</li> <li>What are your expectations in case these heritage sites are damaged by external factors? There are no expected damages.</li> </ul>			

## Appendix 8 Stakeholder Engagement Activities Undertaken by Tosyalı for the Tosyalı SPP Project

## Informative Brochure\_Project Information (Page 1)

Tosyalı	Tosyalı Demir Çelik San. A.Ş. Proje sahibi ve yatırımcısıdır.
EPC	İnojen Enerji Teknolojileri ve Yatırımları A.Ş., Projenin inşaat aşamasında mühendislik çalışmaları, malzeme tedariki, iletim hattı ve inşaatından sorumludur.
TEİAŞ	Türkiye Elektirik İletim A.Ş. kamu kurumu olarak, üretim tesislerinin ulusal iletim sistemine entegrasyonundan sorumludur.

## Projenin amaçları nelerdir?

- Temiz ve yenilenebilir bir enerji olan güneş enerjisi santralının kurulmasıyla fosil yakıtlara olan bağımlılığı azaltmak ve sera gazı emisyonlarının azaltılmasıyla iklim değişikliği etkilerini hafifletmek,
- Türkiye'de yenilenebilir enerji konularında teknoloji transferinin ve Araştırma-Geliştirme (Ar-GE) faaliyetlerinin geliştirilmesine katkı sağlamak,
- Türkiye'nin sürdürülebilirlik hedeflerine katkı sağlamak,
- Çevresel sorumluluğu teşvik etmek,
- Karbon emisyonlarını azaltarak daha temiz ve daha sürdürülebilir bir enerji geleceğine geçişte katkıda bulunurken ekonomik faydalar sunmak.
- Öz tüketim modeliyle enerji maliyetlerini düşürmek,
- Yerel istihdam ve ekonomik katkı sağlamak,
- Uluslararası çevresel ve sosyal standartlara uygunluk sağlamak,
- Türkiye'nin iklim değişikliği ile mücadele hedeflerine katkıda bulunmak.



## TOSYALI OSMANİYE GES PROJESİ TANITIM BROŞÜRÜ

### Proje etki alanı içindeki yerleşim yerleri hangileridir?

Proje etki alanı içerisinde Osmaniye ili Toprakkale ilçesi Büyüktüysüz/ Türkmen , Hatay ili Erzin ilçesi Turunçlu, Hürriyet ve Yeşiltepe köy/beldeleri yer almaktadır.

### Projenin Özellikleri

"Tosyalı Osmaniye Güneş Enerjisi Santrali (GES)" başlıklı Proje, Tosyalı Demir Çelik Sanayi Anonim Şirketi tarafından Osmaniye İli, Toprakkale ilçesi, Türkmen/Büyüktüysüz Köyü, 246/2 Parsel'de geliştirilmesi ve işletilmesi planlanmaktadır.

147,28 hektarlık bir alanda 120,56 MWp/88 MWe planlanan kapasiteye sahip Proje, yılda yaklaşık 245 milyon kWh elektrik üretmeyi hedeflemektedir.

Projenin inşaat ve montaj aşamasının 12 ay sürmesi, ekonomik ömrünün ise 25 yıl olması öngörülmüştür.

Tesisin ana bileşenleri güneş panelleri, tracker (güneş takip sistemi) ve PV modül taşıyıcı sistemi, DC Birleştirici Kutusu, evirici istasyonları ve trafo merkezinden oluşmaktadır.

## Informative Brochure\_Project Information (Page 2)

**Çevresel ve Sosyal Etki Değerlendirme**

Proje için ulusal ÇED Yönetmeliği gereklilikleri uyarınca Çevresel Etki Değerlendirmesi (ÇED) raporu hazırlanmış olup 23.01.2025 tarihinde "ÇED Olumlu" kararı alınmıştır (Karar no: 8155).

Ayrıca, IFC (International Finance Corporation – Uluslararası Finans Kurumu) Standartları, Ekvator Prensipleri, Ekonomik İş birliği ve Kalkınma Örgütü'nün (OECD) Ortak Yaklaşımları ve Kılavuzları ve sektördeki en iyi uygulamalar ile uyumlu bir Çevresel ve Sosyal Etki Değerlendirme (ÇSED) çalışması yürütülmektedir.

ÇSED çalışmalarının amacı, projeden etkilenen paydaşları tespit etmek, bu paydaşların katılımları ile projeden kaynaklanabilecek olumsuz etkileri minimum düzeye indirmek ve olumlu etkileri güçlendirmektir.

Projeden etkilenen paydaşların görüş ve önerilerinin alınarak halkın katılımının sağlanması ÇSED çalışmalarının temel hedefidir.

**Toprak ve Arazi Kullanımı:** Proje için iki farklı lokasyondan toprak numunesi alınarak analizler gerçekleştirilmiş ve ulusal ve uluslararası standartlarda belirlenen limit değerlere göre mevcut toprak kalitesi belirlenmiştir.

**Su Kalitesi:** Hidrojeolojik Değerlendirme Ön Raporu için izlemeyi desteklemek ve gerekli önlem tedbirlerini uygulamak için DSİ tarafından belirlenen yerlerde kuyular açılacaktır. Bu kuyular kurulduktan sonra yeraltı suyu akış yönlerine göre yeraltı suyu analizi için örnekleme noktaları belirlenecektir. Yeraltı suyu ölçümleri ve analizleri, sondaj tamamlandıktan sonra bu kuyulardan toplanan numuneler kullanılarak yapılacaktır.

**Jeolojik ve Jeomorfolojik Değerlendirme:** Proje alanında mühendislik çalışmaları kapsamında jeoteknik etütler yapılmıştır.

**Gürültü ve Titreşim:** Proje çalışmaları kapsamında gürültü ve titreşim ölçümleri gerçekleştirilmiştir.

**Biyoçeşitlilik:** Proje için tüm proje bileşenlerini içerecek şekilde bir biyoçeşitlilik yerel çalışma alanı belirlenmiştir ve ilgili uzmanlar tarafından saha çalışmaları gerçekleştirilmektedir.

**Sosyal Bileşenler:** Sosyal saha çalışması kapsamında proje etki alanı içinde bulunan mahalle ve köyler ziyaret edilmekte ve proje tanıtımı yapılmaktadır.

**Kültürel Miras ve Arkeoloji:** Proje etki alanı içinde bulunan taşınır ve taşınmaz arkeolojik ve kültür varlıklarının tespiti için detaylı arkeolojik yüzey araştırması yapılmış, kurum görüşleri alınmış herhangi bir uygunsuzluğa rastlanmamıştır.

**İşgücü ve Çalışma Şartları:** Projenin inşaat aşamasında 350, işletme aşamasında ise 25 kişi istihdam edilecektir. İşe alım ve çalışma koşullarında 4857 sayılı İş Kanunu ve uluslararası standartlar uygulanacaktır.

**Topluluk Temsilcisi (CLO):**

**Tufan Enes YUMUŞAKER – 0530 930 2546**  
**ges.projelistirme@tosyaliholding.com.tr**

Görüşme Noktası: Saha ziyaretleri sırasında sosyal uzmanlardan birebir bilgi alabilirsiniz.

Şikayet/Dilek Kutuları: Camiye, muhtarlığa yerleştirilen kutulara yazılı olarak başvuru yapılabilir.



## Informative Brochure\_Livelihood Restoration Plan (Page 1)



## TOSYALI OSMANİYE GES PROJESİ GEÇİM KAYBINI ÖNLEME VE DESTEK PROGRAMI BİLGİLENDİRME BROŞÜRÜ



### Proje Nedir ?

Tosyalı Holding, demir-çelik sektöründe Türkiye'nin ve dünyanın önde gelen üreticilerinden biridir. Sürdürülebilirlik hedefleri doğrultusunda enerji ihtiyacını yenilenebilir kaynaklardan karşılamak amacıyla Osmaniyeye'de Güneş Enerji Santrali (GES) yatırımı gerçekleştirmektedir. Bu proje, çevresel etkileri en aza indirmenin yanı sıra yerel toplulukların yaşam koşullarını korumayı ve geliştirmeyi hedeflemektedir.

Tosyalı Osmaniyeye Güneş Enerji Santrali (GES) Projesi, Osmaniyeye İli Toprakkale Bölgesi'nde gerçekleştirilen bir yenilenebilir enerji yatırımdır. Proje sahasında geçici olarak konaklayan Yörük ailelerinin geçim kaynaklarından etkilenmemesi için özel destek planları uygulanmaktadır.

### LRP nedir ?

Geçim Kaybı Önleme Planı (Livelihood Restoration Plan - LRP), projeden doğrudan veya dolaylı olarak etkilenebilecek bireylerin mevcut yaşam standartlarının korunması ve sürdürülebilir geçim kaynaklarına erişimlerinin güvence altına alınması amacıyla hazırlanmıştır. IFC Performans Standardı 5 (Arazi Edinimi ve Zorunlu Yer Değişiklikleri) ile uyumlu olarak, geçim kaynaklarını etkileyen her türlü durum için telafi edici, destekleyici ve yönlendirici önlemler alınmaktadır.

### Kimler Bu Broşürden Yararlanabilir?

- Hayvancılıkla uğraşan Yörük aileleri
- Göçer yaşam tarzını sürdüren topluluklar
- Kadın hane reisleri
- Yaşlı bireyler
- Okula devam eden çocuklar ve gençler
- Okuma yazma bilmeyen bireyler



### Bilgilendirme ve Destek Konuları

- Taşınma ve yer seçim süreçlerine ilişkin birebir bilgilendirme
- Yeni alanların uygunluğuna dair kamu kurumlarıyla iş birliği
- Tekrar taşınma riskini azaltacak planlama
- Barınma ve hayvan muhafazası için uygun yaşam alanlarının belirlenmesi
- Kadınlar, yaşlılar, çocuklar ve okuryazarlığı olmayan bireylerle uygun yöntemlerle görüşme
- Görsellerle desteklenmiş toplantılar ve rehberlik uygulamaları
- Toplum Temsilcisi (CLO) aracılığıyla sürekli bilgi akışı
- Düşünce, öneri ve şikayetlerin doğrudan iletebileceği mekanizmalar
- Yazılı, sözlü ve mobil başvuru yöntemleri



### Nasıl Bilgi Alabilirim ?

Topluluk Temsilcisi (CLO):

**Tufan Enes YUMUŞAKER – 0530 930 2546**

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- Görüşme Noktası: Saha ziyaretleri sırasında sosyal uzmanlardan birebir bilgi alabilirsiniz.
- Şikayet Kutuları: Camiye, muhtarlığa yerleştirilen kutulara yazılı olarak başvuru yapılabilir.



## Informative Brochure\_Livelihood Restoration Plan (Page 2)

**Şikayetlerinizi Nasıl Bildirebilirsiniz?**

- Şikayet ve önerileriniz en geç 15 iş günü içinde değerlendirilir ve size geri dönüş yapılır.
- Başvurular gizli tutulur.
- İsim belirtmeden de kutular aracılığıyla yazılı bildirim yapabilirsiniz.
- Her şikayet kayıt altına alınır ve izlenir.

**Haklarınızı Biliyor Musunuz?**

- Şikayet ve önerileriniz en geç 15 iş günü içinde değerlendirilir ve size geri dönüş yapılır.
- Başvurular gizli tutulur.
- İsim belirtmeden de kutular aracılığıyla yazılı bildirim yapabilirsiniz.
- Her şikayet kayıt altına alınır ve izlenir.

**Ne zaman Bilgilendirileceğim ?**

- Her ay sahada sosyal uzmanlar tarafından yüz yüze ziyaretler yapılmaktadır.
- Toplantı ve bilgilendirme günleri cami, muhtarlık ve yayla noktalarında ilan edilecektir.
- Saha ziyaretleri sırasında özel görüşme talep edebilirsiniz.



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## Informative Brochure\_Code of Conduct

**TOSYALI Demir Çelik**

## TOSYALI OSMANİYE GES PROJESİ - DAVRANIŞ KURALLARI ÖZETİ



Tosyalı Demir Çelik Sanayi A.Ş. olarak yürütülen Osmaniye Güneş Enerji Santrali (GES) Projesi kapsamında, tüm proje çalışanlarının ve alt yüklenicilerinin uyması gereken Davranış Kuralları belirlenmiştir. Bu kurallar, hem çalışanların hem de yerel toplulukların güvenliği, sağlığı ve refahını korumayı amaçlamaktadır.

### Temel İlkelerimiz

- Tüm çalışanlar görevlerini dürüst, dikkatli ve saygılı bir şekilde yerine getirecektir.
- Yerel topluluğa, özellikle de hassas ve kırılgan gruplara karşı saygılı olmalı, ayrımcılık yapmamalıdır.
- Cinsel taciz, sömürü veya toplumsal cinsiyete dayalı şiddet kesinlikle kabul edilmez.
- Proje alanında çocuk işçi çalıştırılmaz; çocukların korunmasına özen gösterilir.
- Uyuşturucu ve alkol kullanımı yasaktır.
- Tüm ekipmanlar ve malzemeler dikkatli ve amacına uygun şekilde kullanılmalıdır.
- Rüşvet, yolsuzluk ve yasa dışı finansal faaliyetlere kesinlikle izin verilmez.

### Endişelerin Bildirilmesi

Projeye ilgili herhangi bir uygunsuz davranış fark edilirse ya da bir endişe oluşursa; Topluluk Temsilcimiz ile irtibata geçebilir endişelerinizi /önerilerinizi dile getirebilirsiniz. Erişilebilir noktalara bıraktığımız paydaş iletişim formu aracılığıyla dilek / Şikayet ve davranış kurallarına ilişkin önerileriniz var ise bildirilebilirsiniz. Bu formlar aracılığıyla bu durum gizli şekilde (anonim seçeneği ile ) bildirilebilir. İsim ile gelen bildirimler 3. şahıslarla paylaşılmaz ve misilleme yapılmaz.

**TOSYALI Demir Çelik**

**TOSYALI Demir Çelik**



### İletişim

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## Suggestion QR Code Poster



## TOSYALI OSMANİYE GES

 **KAZA RAMAK KALA OLAY VE TEHLİKE  
UYGUNSUZLUK BİLDİRİMLERİ İLE  
DİLEK, ŞİKAYET VE ÖNERİLERİNİZİ  
BİZİMLE PAYLAŞIN.**



**SENİ VE GÖRÜŞ/ÖNERİLERİNİ  
ÖNEMSIYORUZ.**

## Complaint Box and QR Code in Toprakkale Türkmen Town Municipality

