TOSYALI Demir Çelik

ÇINAR ENGINEERING CONSULTANCY INC.

# TOSYALI OSMANIYE SOLAR POWER PLANT PROJECT

## NON-TECHNICAL SUMMARY

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**(Final)**

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# ABBREVIATIONS & DEFINITIONS

| | |
|---|---|
| **AMP** | Accommodation Management Plan |
| **AoI** | Area of Influence |
| **AQMP** | Air Quality Management Plan |
| **BAP** | Biodiversity Action Plan |
| **BAR** | Biodiversity Assessment Report |
| **BMP** | Biodiversity Management Plan |
| **CCRA** | Climate Change Risk Assessment |
| **CFP** | Chance Find Procedure |
| **CHMP** | Cultural Heritage Management Plan |
| **CHSSMP** | Community Health, Safety and Security Management Plan |
| **CİMER** | Presidency's Communication Center |
| **ÇINAR or Consultant** | ÇINAR Engineering Consulting Inc. |
| **CLO** | Community Liaison Officer |
| **CMP** | Contractor Management Plan |
| **E&S** | Environmental and Social |
| **EPC** | Engineering, Procurement and Construction |
| **EPRP** | Emergency Preparedness and Response Plan |
| **ESIA** | Environmental and Social Impact Assessment |
| **ESMP** | Environmental and Social Management Plan |
| **ESMS** | Environmental and Social Management System |
| **ETL** | Energy Transmission Line |
| **GHG** | Greenhouse Gas |
| **HMMP** | Hazardous Materials Management Plan |
| **HRIA** | Human Rights Impact Assessment |
| **IASMP** | Invasive Alien Species Management Procedure |
| **IFC** | International Finance Corporation |
| **İnojen** | İnojen Enerji Teknolojileri ve Yatırımları Anonim Şirketi |
| **IPCC** | International Panel on Climate Change |
| **Kocabey** | Kocabey Hafriyat Nak. ve İnş. Taah. Tic. Ltd. Şti. |
| **LMP** | Labor Management Plan |
| **LRP** | Livelihood Restoration Plan |
| **Mast** | Mast Enerji ve Teknolojileri A.Ş. |
| **NNL** | No Net Loss |
| **NNLP** | No Net Loss Plan |
| **NTS** | Non-Technical Summary |
| **NVMP** | Noise and Vibration Management Plan |

| | |
|---|---|
| **OHS** | Occupational Health and Safety |
| **OHSMP** | Occupational Health and Safety Management Plan |
| **PAP** | Project Affected Persons |
| **PPE** | Personal Protective Equipment |
| **Project** | Tosyalı Osmaniye Solar Power Plant Project |
| **PV** | Photovoltaic |
| **SEP** | Stakeholder Engagement Plan |
| **SMP** | Soil Management Plan |
| **SPP** | Solar Power Plant |
| **TCFD** | Task Force on Climate-related Financial Disclosures |
| **TEİAŞ** | Turkish Electricity Transmission Company |
| **TMP** | Traffic Management Plan |
| **Tosyalı or Project Owner** | Tosyalı Demir Çelik Sanayi Anonim Şirketi |
| **WMP** | Water Management Plan |
| **WWMP** | Waste and Wastewater Management Plan |
| **YİMER** | Foreigners Communication Center (Yabancılar İletişim Merkezi) |

# 1 INTRODUCTION & PURPOSE OF THIS DOCUMENT

This document presents the Non-Technical Summary (NTS) of the Environmental and Social Impact Assessment (ESIA) prepared for the Tosyalı Osmaniye Solar Power Plant (SPP) Project and its associated Energy Transmission Line (ETL). The NTS has been developed to provide a clear, accessible and comprehensive overview of the Project, its environmental and social context, the potential impacts identified, and the measures proposed to avoid, minimize and manage those impacts.

The NTS is intended for a broad audience, including local communities, public authorities, financing institutions, and other interested stakeholders who may not be familiar with technical ESIA documentation. Accordingly, it summarizes key findings and commitments in non-technical language, while remaining consistent with the conclusions of the full ESIA Report and the supporting specialist studies prepared for the Project.

The Project has been subject to an extensive environmental and social assessment process due to the presence of sensitive environmental and social receptors within the wider Project Area. These include biodiversity values, land use patterns associated with seasonal and traditional livelihoods, cultural heritage features, and a protected groundwater context. In addition, the Project comprises both a solar power generation facility and a linear transmission component, which required a comprehensive assessment of spatially distributed and potentially permanent impacts.

This NTS follows a structure, whereby the key elements of the ESIA are presented in a logical sequence covering project description, baseline conditions, impact assessment, mitigation measures, management systems, and stakeholder engagement. Dedicated sections include Human Rights Impact Assessment, Climate Change Risk Assessment, cumulative impacts, and grievance mechanisms, reflecting good international practice and lender requirements.

The NTS has been prepared in line with applicable national legislation and international standards, including the Environmental and Social Performance Standards of the International Finance Corporation (IFC), as well as the requirements of the Project's financing institutions. It is designed to support transparency and informed stakeholder engagement by enabling readers to understand how environmental and social risks have been identified and how the Project commits to managing these risks throughout construction and operation.

# 2 PROJECT DESCRIPTION

## 2.1 Project Overview

The Tosyalı Osmaniye Solar Power Plant Project (the Project) is being developed by Tosyalı Demir Çelik Sanayi Anonim Şirketi (Tosyalı) in Osmaniye Province, Türkiye. The Project comprises the development of a Solar Power Plant (SPP) and its associated Energy Transmission Line (ETL), which is required for the evacuation of electricity to the national grid.

The Project is being financed by international financial institutions, and the Environmental and Social Impact Assessment (ESIA) has been prepared in line with national legislation and applicable international standards.

The Project area is in Türkmen/Büyüktüysüz Village, Toprakkale District, Osmaniye province. It is approximately 15 km away from the center of Osmaniye province and about 8 km from the center of Toprakkale district. The Project area is approximately 60 km away from the center of Hatay province, measured as air distance. The spatial context of the Project has been defined and illustrated in Figure 1 and provides an overview of the Project location.

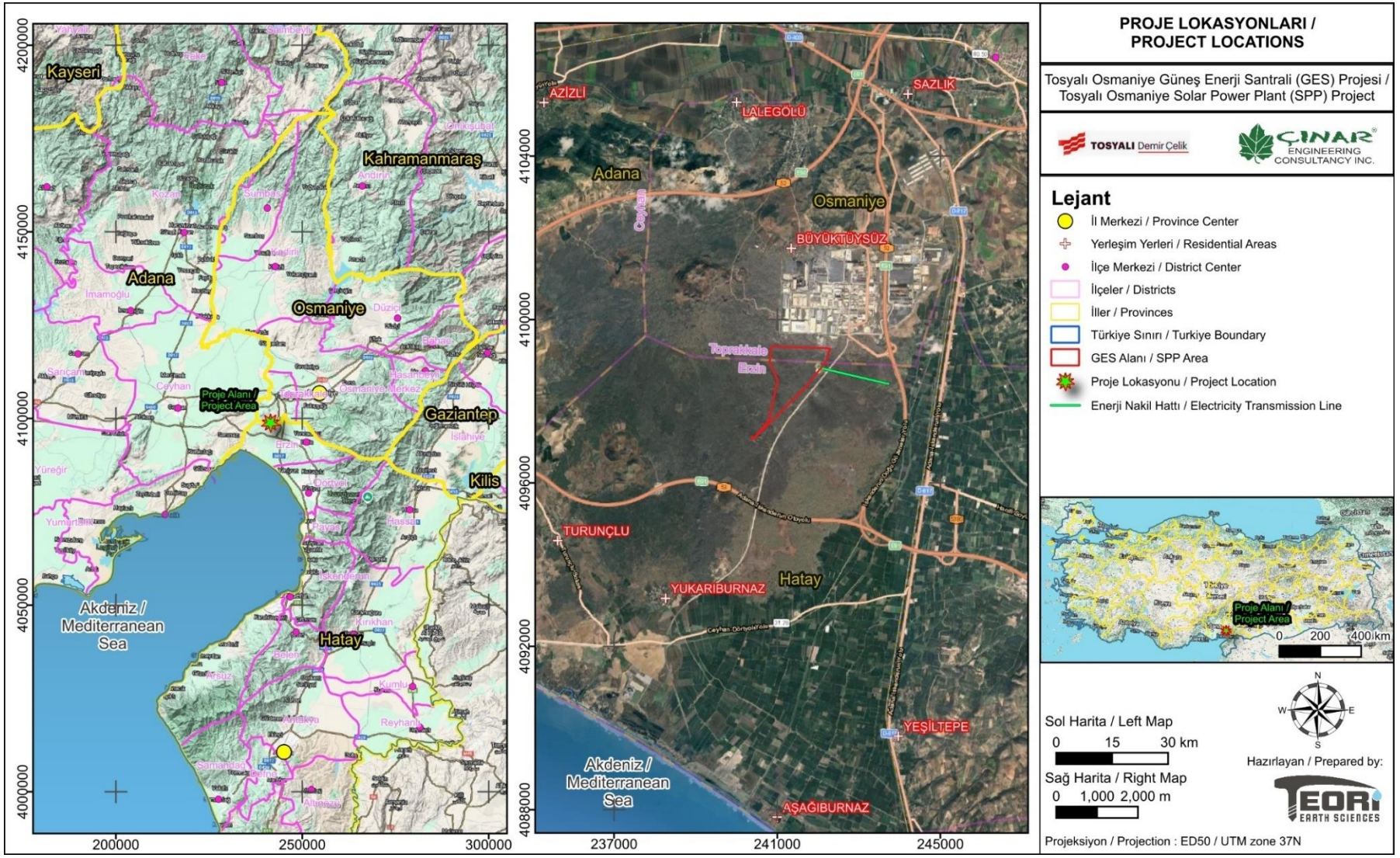


*Figure 1. Project Location Map*

## 2.2 Solar Power Plant (SPP)

The Project involves the development and operation of a utility-scale SPP located in Osmaniye Province, Türkiye. The SPP is designed to generate electricity from renewable solar energy and contribute to national energy supply and decarbonization targets. The Project Area has been selected based on technical feasibility, land availability, and proximity to existing infrastructure, while taking into account environmental and social constraints identified during the ESIA process.

The SPP will consist primarily of photovoltaic (PV) panels mounted on support structures, inverters, internal access roads and auxiliary electrical equipment. Electricity generated by the SPP will be transmitted to the national grid via the associated Energy Transmission Line (ETL). The layout of the SPP has been optimized to minimize land take, avoid sensitive features where practicable, and reduce potential environmental and social impacts.

Construction activities within the SPP area will include site preparation, installation of PV panels and electrical equipment, and development of internal access routes. During operation, the SPP will function with limited on-site personnel and minimal routine activities, primarily related to maintenance and monitoring.

### 2.2.1 Ancillary Facilities

In addition to the main SPP components, the Project will require a number of ancillary facilities to support construction activities. These ancillary facilities form part of the Project but are generally temporary or support-related in nature and are distinct from associated facilities.

Ancillary facilities are expected to include temporary construction laydown areas, storage zones for materials and equipment, site offices, temporary access arrangements, and other supporting infrastructure necessary for safe and efficient construction. Where applicable, temporary worker welfare facilities (break areas, sanitary facilities etc.) may also be used in accordance with national regulations and international standards.

The locations and layouts of ancillary facilities have been selected to avoid environmentally and socially sensitive areas and within the Project land. Their use will be time-limited, and affected areas will be reinstated following completion of construction activities in line with the Project's environmental and social management commitments.

## 2.3 Energy Transmission Line (ETL) – Associated Facility

Electricity generated by the SPP will be evacuated to the national electricity network through an Energy Transmission Line (ETL). The ETL is considered an Associated Facility to the Project, as it is essential for the transmission and use of electricity generated by the SPP, although it may be developed and operated by entities other than the Project Company.

The ETL comprises a linear infrastructure extending beyond the SPP footprint and includes transmission towers and associated access arrangements. Due to its linear nature, the ETL interacts with a range of environmental and social receptors, including land uses, habitats, and existing infrastructure.

The alignment of the ETL has been determined through technical and environmental considerations, with efforts made to minimize land take, avoid sensitive features, and reduce potential impacts. While the ETL footprint at each tower location is relatively small, its spatial

extent has required dedicated assessment within the ESIA to address localized and, in some cases, permanent impacts.

The ETL is considered an associated facility under international lender requirements, as is necessary for the evacuation of electricity generated by the Project. The ETL has therefore been assessed within the scope of the ESIA, including its environmental and social impacts.

Figure 2 provides an overview of the Project's spatial arrangement of the SPP and ETL within the broader project area.

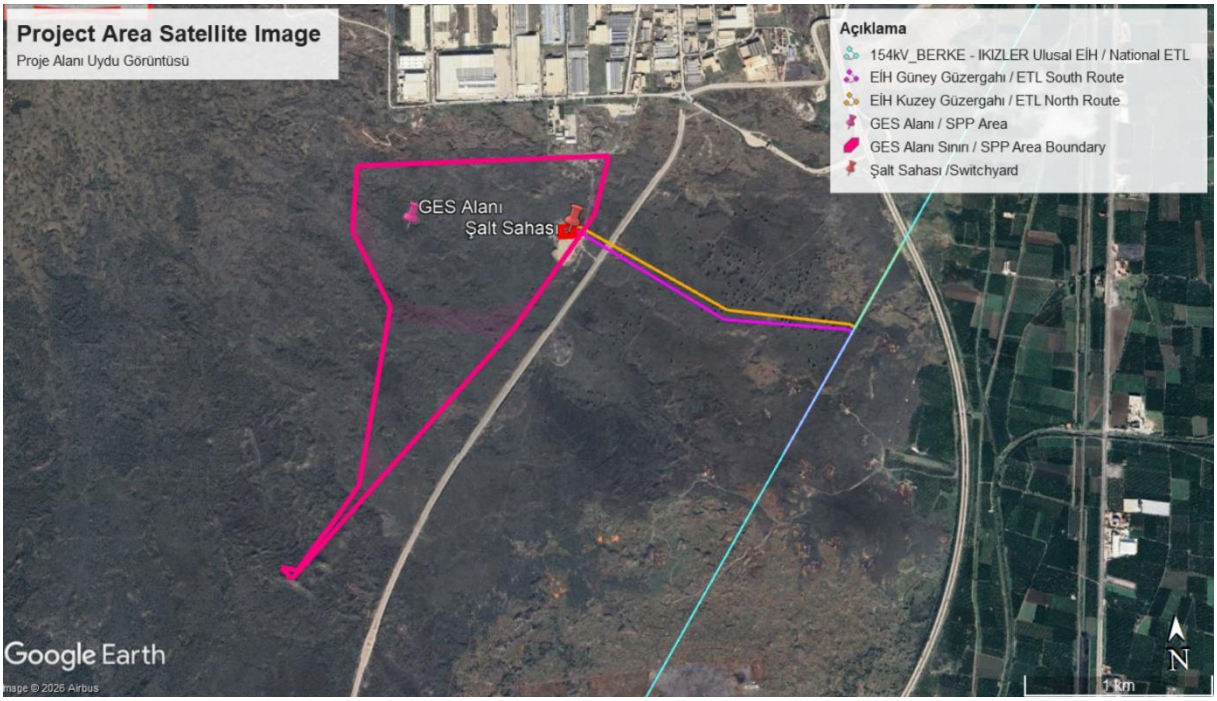


***Figure 2. Satellite Image Showing SPP and Associated ETL***

## 2.4 Project Activities and Schedule

The Project will be implemented through two main phases: land preparation and construction phase and operation phase. Project activities are planned to be implemented in sequential phases, including site preparation, construction, installation, and operation.

The land preparation and construction phase will involve site preparation, installation of SPP components, construction of ETL towers, stringing of conductors, and commissioning activities. Construction activities are temporary in nature but may give rise to short-term environmental and social impacts, particularly related to land disturbance, noise, dust, traffic, and workforce presence. The entire land preparation and construction are planned to be completed within a total duration of 12 months.

The operation phase will involve the long-term operation (approximately 25 years) and maintenance of the SPP and ETL. Operational activities are expected to be limited in scale and frequency and are not anticipated to generate significant ongoing environmental or social impacts when managed in accordance with the Project's environmental and social management system.

The overall Project schedule has been developed to optimize construction efficiency while allowing for the implementation of mitigation measures and monitoring requirements identified through the ESIA.

## 2.5 Workforce Requirements

The Project will require a workforce during both construction and operation phases, with peak employment occurring during construction. The construction workforce will include skilled and unskilled personnel, contractors, and subcontractors. During operation, staffing requirements will be significantly lower and will focus on technical maintenance and monitoring roles. During the construction phase 350 workers and during the operation phase 25 personnel are planned to be employed. The staff will work 8 hours per day.

The Project aims, where feasible, to prioritize local employment opportunities and to ensure that all workers are employed under conditions consistent with national labor legislation and international standards. Workforce accommodation, welfare facilities, occupational health and safety measures, and worker grievance mechanisms will be implemented in line with the Project's Labor and Working Conditions framework.

## 2.6 Alternative Analysis

An analysis of alternatives was undertaken as part of the ESIA process to identify and evaluate feasible options related to Project location, layout, design, and technical configuration. This analysis considered environmental, social, technical, and economic factors.

Alternatives assessed included different layout configurations within the SPP area, variations in the ETL alignment, and design measures aimed at reducing land take and avoiding sensitive receptors. The selected Project configuration represents a balance between technical feasibility and the minimization of environmental and social impacts, informed by the findings of baseline studies and stakeholder inputs.

# 3 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

The ESIA for the Project has been prepared in accordance with the applicable national legislation of Türkiye and relevant international standards and guidelines. This framework provides the basis for the identification, assessment, and management of environmental and social risks and impacts associated with the Project.

At the national level, the Project is subject to Turkish environmental, social, occupational health and safety, and labor legislation, including regulations governing environmental impact assessment, land use, protection of water resources, waste management, cultural heritage, occupational health and safety, and community safety. Relevant permits, approvals, and licenses required for construction and operation have been obtained from the competent authorities in line with these regulations.

In addition to national requirements, the ESIA has been developed to align with international standards, reflecting the expectations of the Project's financing institutions. In this context, the assessment has been carried out in line with the Environmental and Social Performance Standards of the International Finance Corporation (IFC), which provide a comprehensive framework for managing environmental and social risks, including labor and working

conditions, resource efficiency and pollution prevention, community health and safety, land acquisition and involuntary resettlement, biodiversity conservation, and cultural heritage.

The ESIA also takes into account relevant international conventions and guidelines to which Türkiye is a party, as well as international good practice applicable to large-scale renewable energy projects. Where differences exist between national legislation and international standards, the Project has adopted a gap-filling approach to ensure that environmental and social risks are addressed in a manner consistent with lender requirements.

Institutionally, the Project Company holds primary responsibility for ensuring compliance with the applicable environmental and social framework. This responsibility extends to contractors and subcontractors engaged during construction and operation, who will be required to comply with Project-specific environmental and social requirements as part of their contractual obligations. Oversight, monitoring, and reporting arrangements have been established to ensure effective implementation of these requirements throughout the Project lifecycle.

# 4 ENVIRONMENTAL AND SOCIAL BASELINE CONDITIONS

## 4.1 Area of Influence

The Project's area of influence (AoI) has been defined to capture the geographical extent within which environmental and social baseline conditions and potential Project-related impacts may occur. The AoI includes the SPP footprint, the ETL corridor, associated access routes, and nearby settlements that may be affected during construction and operation activities.

The project area, AoI, and the close sensitive receptors around the project area are shown in the map given with Figure 3 and Figure 4.

The nearest settlements and/or sensitive receptors approximate air distances to the project area are given with Table 1. Additionally, Yörüks, who engage in livestock farming to sustain their livelihoods visit the areas located on vicinity of the Project during particular times meet grazing seasons. This situation is part of the evaluation of baseline conditions to provide insight into planning and implementation processes.

***Table 1. Distance to the Nearest Sensitive Receptors***

| Name of the Sensitive Receptor | Air distance (m) |
|---|---|
| Yolbulan-Başтuğ Vocational and Technical Anatolian High School | 125 |
| Yörük Tents (1) | 2,025 |
| Yörük Tents (2) | 1,465 |
| Yörük Tents (3) | 2,360 |
| Büyüktüysüz Neighborhood | 2,200 |
| Yeşiltepe Neighborhood | 2,765 |

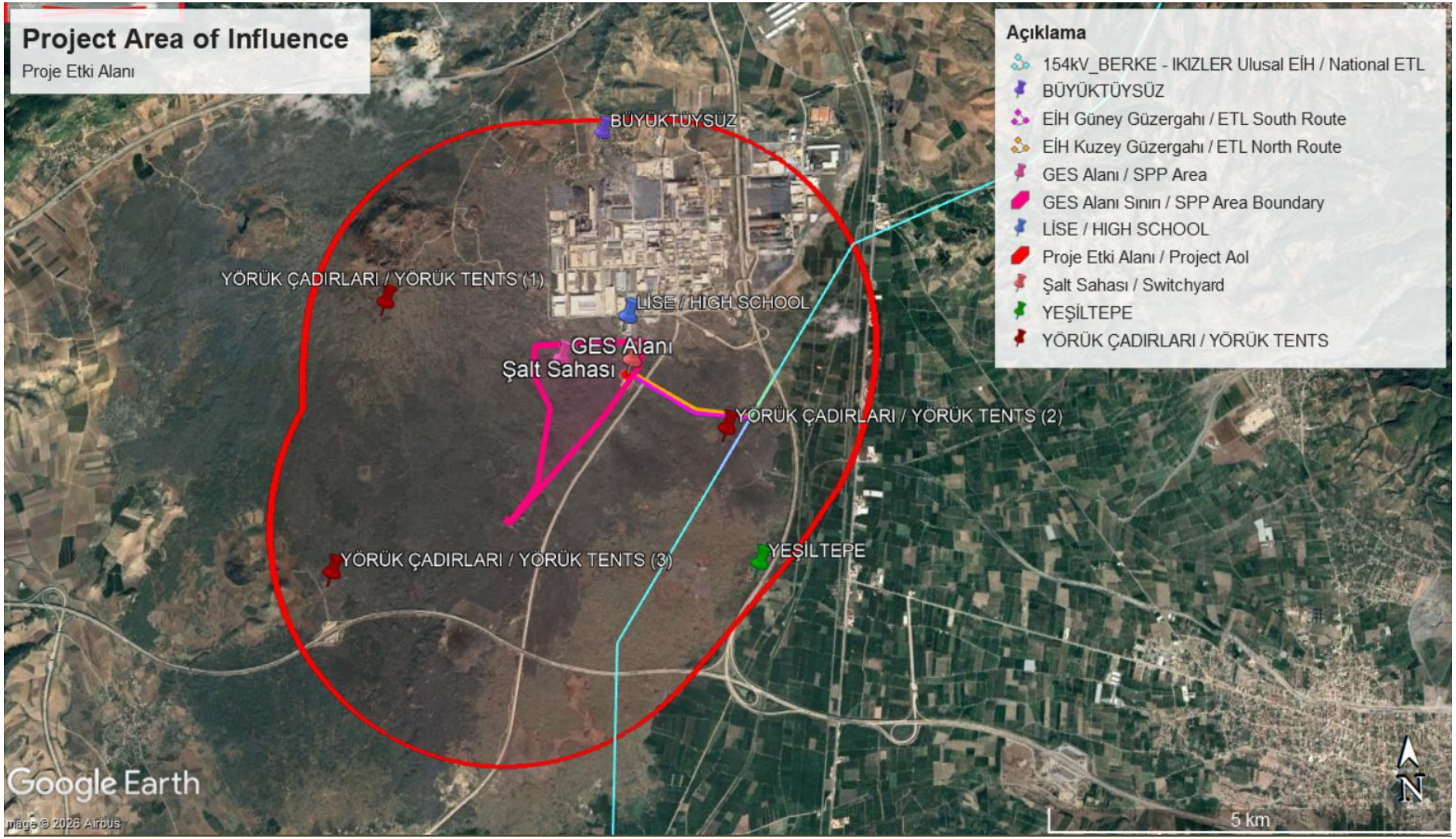


*Figure 3. Project Environmental Area of Influence*

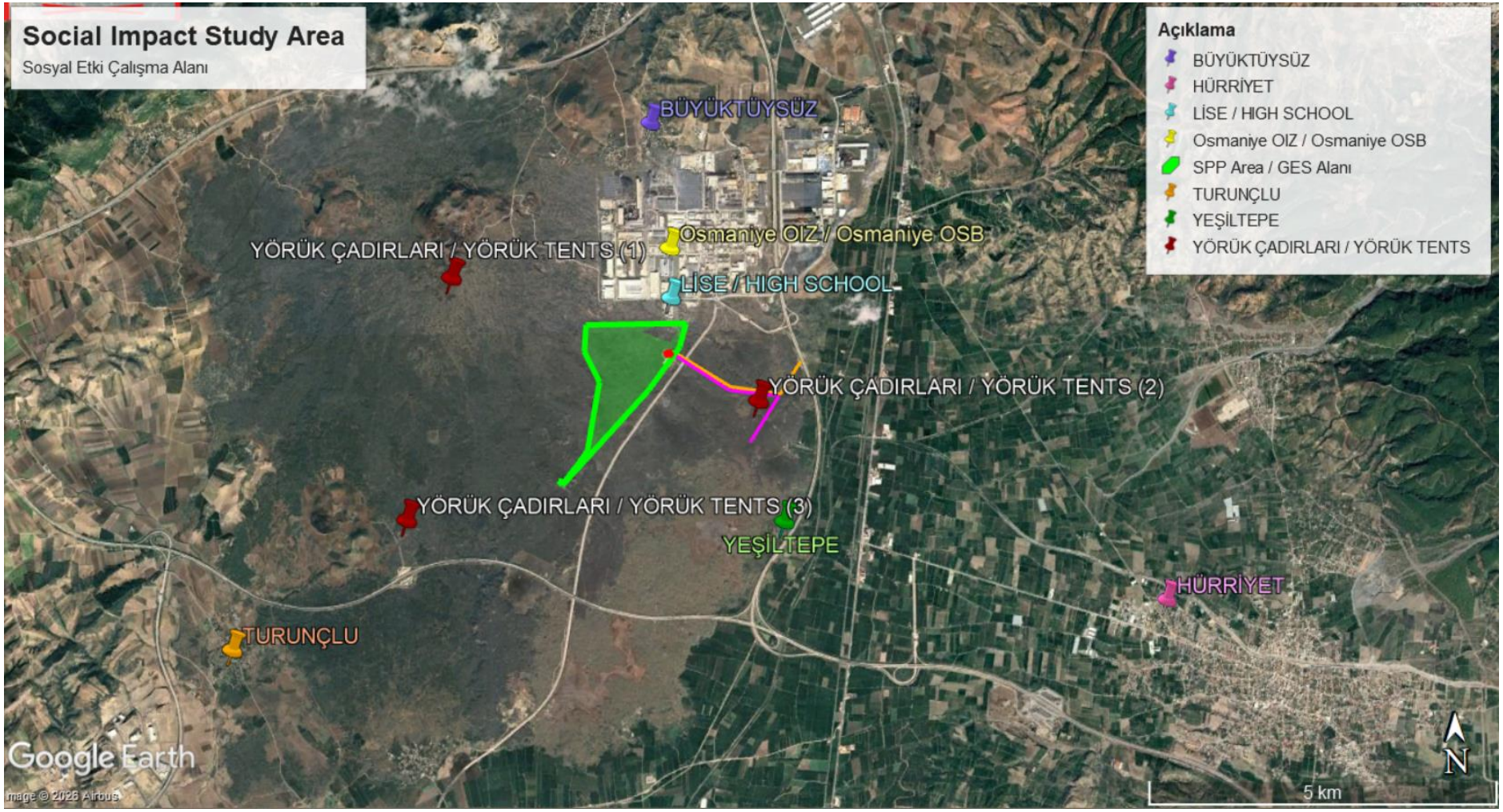


*Figure 4. Project Social Impact Study Area*

## 4.2 Physical Environment

### 4.2.1 Land Use, Geology, Soil and Natural Hazard Potential

The project area is located within the boundaries of Toprakkale district, Osmaniye province, and the ETL passes through the boundaries of Erzin district, Hatay province. Although the project area is defined as "field" in the land registry records, it has been classified as a non-agricultural area in accordance with the official opinion of the Osmaniye Provincial Directorate of Agriculture and Forestry. The ETL route passes through areas classified as "pastureland." The project area has been allocated to the project owner by the Ministry of Industry and Technology, and the necessary legal permits and allocation processes are being carried out.

According to land use assessments, the entire project area is covered with natural scrub-like vegetation (sclerophyllous vegetation). Although there are different types of land use around the project area, such as agricultural fields, settlements, industrial facilities, and transportation infrastructure, the project site itself is entirely a natural area.

In terms of soil characteristics, the Project area consists entirely of basaltic soils, formed through the weathering of volcanic rocks. These soils are generally not suitable for cultivated agriculture. Land capability and classification studies indicate that the area falls within a class with limited agricultural potential and higher sensitivity to erosion, and that the current land use is associated with pasture conditions.

Erosion assessments indicate that, in general terms, the Project area may have high susceptibility to both water and wind erosion. However, these assessments represent indicative classifications. Project-specific geological and geotechnical investigations did not identify any evidence of landslides, mass movement processes, or active erosion-prone geomorphological features within the site. The terrain is underlain by stable basaltic formations and is considered suitable from an engineering perspective.

A baseline soil quality study was conducted by an accredited laboratory, and the analytical results were compared against relevant national and international reference values. The results indicate that no contamination exceeding applicable guideline values was detected, and the soil conditions do not present an environmental or human health concern. Elevated concentrations of certain elements (e.g., selenium), where observed, are considered to be associated with natural geological background conditions rather than project-related contamination sources.

Geologically, the Project area is located on the Quaternary-aged Delihalil Basalt unit. The region has been influenced by historic volcanic activity and is currently characterized by competent basaltic rock with generally favourable engineering properties and bearing capacity. During drilling investigations, no groundwater table was encountered within the investigated depths, and the site conditions were assessed as suitable for construction.

With respect to natural hazards, the Project area is located in one of Türkiye’s seismically active regions. While regional seismic hazard is significant, no site-specific risks related to flooding/flash floods, landslides or avalanches were identified for the Project area. Project design and implementation will comply fully with the applicable seismic design criteria and Turkish regulations. In addition, appropriate surface water management, drainage, and erosion

control measures will be applied to enhance resilience against intense rainfall events and other climate-related stressors.

### 4.2.2 Hydrology, Hydrogeology and Water Resources

Surface water resources within the Project Area are limited, and no major permanent surface water bodies are located within the immediate SPP footprint. The hydrological regime is primarily influenced by seasonal precipitation patterns, with surface runoff occurring during periods of intense rainfall.

The Project Area is located within a hydrogeological context that includes groundwater resources of local and regional importance. Certain parts of the wider area fall within a protected groundwater setting (Burnaz Spring), which has been identified as a sensitive environmental receptor. Baseline studies indicate that groundwater quality is generally suitable for existing uses, provided that potential contamination sources are effectively managed.

Water use for the Project is expected to be limited, particularly during operation. Baseline conditions highlight the importance of preventing pollution and managing construction-related activities to ensure that both surface water and groundwater resources remain protected.

### 4.2.3 Air Quality

Baseline air quality conditions in the Project Area are characteristic of a rural environment, with limited industrial activity and low background levels of air pollutants. Existing sources of air emissions are primarily related to local traffic, agricultural activities, and small-scale settlements.

No significant air quality exceedances were identified under baseline conditions. Sensitive receptors, including nearby settlements, are located at a distance that limits exposure to existing emission sources. These baseline conditions provide a favorable context for managing temporary air quality impacts during construction through standard mitigation measures.

### 4.2.4 Greenhouse Gas Emissions

Baseline greenhouse gas (GHG) emissions within the Project Area are low and are mainly associated with existing land use activities, organized industrial zone, transportation, and limited local energy consumption.

The development of the SPP represents a renewable energy investment that will contribute to the reduction of GHG emissions at a national level by displacing electricity generated from fossil fuel sources. Baseline conditions provide a reference against which Project-related emissions during construction and operation can be assessed.

### 4.2.5 Noise and Vibration

The baseline noise environment in the Project Area reflects typical rural background conditions, characterized by low ambient noise levels. Existing noise sources are mainly related to local road traffic, agricultural machinery, and settlement-related activities.

No significant vibration sources were identified under baseline conditions. Sensitive receptors, such as residential areas, are present within the wider Project Area but are generally exposed

to low background noise levels. These conditions are relevant for assessing potential temporary noise impacts during construction activities.

### 4.2.6 Waste and Resource Management

Waste management in Osmaniye Province is implemented in accordance with national legislation through licensed waste management facilities. Due to the proximity of the Project area to Erzin District of Hatay Province, licensed waste facilities in Hatay have also been considered within the baseline assessment.

Municipal solid waste management is carried out by the Osmaniye Solid Waste Disposal and Infrastructure Services Municipalities Union, with waste being disposed of at a licensed sanitary landfill facility. The facility is authorized for municipal and non-hazardous waste disposal, medical waste sterilization, and the processing of biodegradable waste through mechanical sorting and composting. In addition, waste transfer stations operate within the province.

Licensed facilities and designated areas are available for the management of excavation soil and construction and demolition waste, in line with applicable regulations. Packaging waste is collected, sorted, and recovered through licensed facilities. The province also hosts licensed recovery and disposal facilities for hazardous waste, waste oils, waste batteries and accumulators, waste vegetable oils, end-of-life tires, and waste electrical and electronic equipment.

Medical waste generated within the province is treated at a licensed medical waste sterilization facility and managed in compliance with regulatory requirements. Overall, Osmaniye Province and its surrounding region have adequate licensed waste management infrastructure to ensure that all waste types potentially generated during the Project can be managed in an environmentally sound and legally compliant manner.

### 4.2.7 Landscape & Visuality

The landscape of the Project Area is shaped by natural topography and long-established land use patterns, resulting in a predominantly rural visual character. Views are generally open, with a landscape that reflects agricultural use, pastureland and scattered infrastructure elements.

The visual sensitivity of the area varies depending on location and viewpoint. While certain parts of the Project Area are visible from surrounding roads and settlements, the baseline assessment indicates that the landscape does not include formally designated scenic or visually protected areas. These baseline characteristics provide the context for evaluating potential visual changes associated with the SPP and ETL.

## 4.3 Biodiversity and Ecosystem

The Biodiversity Assessment for the Tosyalı Osmaniye Solar Power Plant Project was carried out in line with national legislation and international standards, including IFC Performance Standard 6. The assessment is based on desk studies, multi-season field surveys, international databases screening, expert judgment, and previously conducted biodiversity studies in the surrounding area.

The Project Area of Influence is dominated by natural Mediterranean garrigue vegetation, classified as EUNIS F6.2 (Eastern Garrigues). This habitat type is widespread in the region and represents natural habitat but does not qualify as Critical Habitat. No legally protected areas, Key Biodiversity Areas, or Highly Threatened or Unique Ecosystems were identified within the Project area or its immediate surroundings.

Flora and fauna surveys identified species typical of Mediterranean semi-natural ecosystems. Species listed under international and national conservation frameworks were screened in accordance with IFC PS6 Critical Habitat criteria. The assessment confirmed that none of the species recorded or potentially occurring within the Area of Influence meet the quantitative or qualitative thresholds required to trigger Critical Habitat designation. Threatened bird species were identified as irregular or low-density passage migrants, occurring well below globally significant population thresholds.

Key biological receptors, including *Testudo graeca* (Tortoise) and *Cyclamen persicum* (Cyclamen), were identified within the wider area and have been considered in the impact assessment. Potential impacts on biodiversity are associated with habitat loss, disturbance, and limited collision risks related to Project infrastructure. These impacts are localized and assessed through the application of the mitigation hierarchy.

Ecosystem services provided by garrigue habitats, such as soil stabilization, erosion control, microclimate regulation, and habitat provision for native species, were identified as relevant to the Project area. These ecosystem functions are not expected to be significantly affected, provided that mitigation measures are effectively implemented.

A project-specific Biodiversity Management Plan will be implemented to manage biodiversity risks and impacts during construction and operation. In accordance with IFC Performance Standard 6 requirements for natural habitats, the Project is committed to achieving No Net Loss of biodiversity through the implementation of mitigation, restoration of temporarily disturbed areas, and ongoing monitoring.

Detailed findings of the biodiversity baseline and impact assessment are provided in the Biodiversity Assessment Report (BAR), which supports the ESIA.

## 4.4 Socio-Economic Environment

### 4.4.1 Demography

The Project is located within the administrative boundaries of Toprakkale District of Osmaniye Province, with nearby settlements in both Osmaniye and Hatay provinces. The settlements within the primary and secondary social impact areas exhibit predominantly rural characteristics. Population data indicate moderate population density, with household sizes slightly above national and provincial averages. The population structure is dominated by working-age individuals, while the proportion of elderly residents is notable in some settlements. Seasonal population movements occur, particularly due to agricultural labor and post-earthquake mobility.

### 4.4.2 Economy

The local economy is characterized by a mixed livelihood structure. Permanent wage employment, public sector jobs, pensions, and agriculture constitute the main income sources across settlements. Agricultural activities are more pronounced in rural settlements, while wage-based employment is more common in areas closer to the organized industrial zone. Livestock farming exists at a limited scale and is primarily barn-based. Income levels are generally clustered around middle-income ranges, with household expenditures largely focused on basic needs.

### 4.4.3 Education and Health

Education levels in the area are consistent with provincial averages, with high school education being the most common attainment level. Gender-based differences exist in educational duration, with women having shorter average schooling years. Health conditions indicate a high prevalence of chronic diseases within households, particularly among elderly populations. Access to healthcare services is provided through state hospitals located within reasonable distance from the Project area.

### 4.4.4 Vulnerable Groups

Identified vulnerable groups include female-headed households, elderly individuals, persons with disabilities, illiterate individuals, non-Turkish speakers, seasonal agricultural workers, earthquake-affected populations, and Yörük households. Yörük families residing temporarily within the Project area rely primarily on small-scale livestock herding and supplementary activities. These groups may face increased sensitivity to livelihood disruption, access to information, and participation in engagement processes.

### 4.4.5 Technical Infrastructure

Technical infrastructure conditions vary across settlements. Key issues include drinking water shortages, inadequate sewage systems, electricity supply interruptions, and limited road quality. Residents also highlighted the lack of social, recreational, and green spaces. Energy and transportation infrastructure deficiencies are among the most frequently raised local concerns.

### 4.4.6 Ecosystem Services

Ecosystem services in the surrounding settlements include agricultural production, collection of wild plant products, and small-scale use of natural resources. These services support household consumption and limited local trade. No ecosystem service use or related activities were identified within the Project site itself, and Yörük households reported no agricultural use of the Project area.

### 4.4.7 Labor and Working Conditions

Baseline labor conditions in the Project Area reflect the characteristics of rural employment, with a predominance of informal, seasonal, or family-based work related to agriculture and

livestock activities. Formal employment opportunities are limited, and income levels are closely tied to seasonal productivity.

This baseline context provides the reference point for the Project's labor and working conditions framework, which aims to ensure fair employment practices, safe working conditions, and access to grievance mechanisms for Project workers in accordance with national legislation and international standards.

## 4.5 Land Acquisition, Resettlement and Livelihoods

The Project is located within land allocated to the Project. The Project site is registered as non-agricultural land and is owned by the Project Owner. Therefore, the Project does not require land acquisition through expropriation for the solar power plant footprint.

Within the Project area, three Yörük households were identified as informally and temporarily residing on the site and deriving part of their livelihoods from small-scale livestock herding and related activities. These households do not have formal land ownership or usage rights over the Project land. No formal or informal land users were identified along the ETL corridor; therefore, no land acquisition, physical displacement, or economic displacement is expected in relation to the ETL.

As a result of the Project, the three Yörük households will no longer be able to continue their temporary use of the Project area. To address livelihood impacts, a Livelihood Restoration Plan (LRP) has been prepared in accordance with IFC Performance Standard 5. The LRP focuses exclusively on the affected Yörük households and aims to restore their livelihoods to pre-project levels.

The LRP includes measures for voluntary relocation, provision of materials for new shelters, support for livestock-related needs, and continued engagement throughout the relocation and restoration process. Consultations with the affected households have been conducted, relocation areas have been jointly identified, and implementation of livelihood restoration measures has commenced.

No physical resettlement involving permanent housing structures is required. There is no need for a Resettlement Plan, as impacts are limited to temporary livelihood use of land by a small number of households. Monitoring and grievance mechanisms related to land use and livelihoods are implemented as described in the LRP and the Project-specific Stakeholder Engagement Plan.

## 4.6 Cultural Heritage

The Project Area is located within a region with a long history of human settlement, and the presence of cultural heritage assets has therefore been considered as part of the ESIA baseline assessment. Cultural heritage in the wider area includes known archaeological features, historical structures, and areas with potential for previously unidentified subsurface remains.

Baseline studies and consultations with relevant authorities were undertaken to identify known cultural heritage assets within and around the SPP footprint and along the ETL corridor. These assessments informed the Project design and the routing of linear infrastructure, with the objective of avoiding direct impacts on known cultural heritage features wherever practicable.

Despite these measures, the potential for chance finds during construction activities cannot be fully excluded, particularly in areas involving excavation or ground disturbance. Accordingly, cultural heritage has been identified as a sensitive receptor requiring appropriate management during construction.

To manage potential risks, the Project has incorporated cultural heritage considerations into its environmental and social management framework. A Chance Find Procedure (CFP) has been established to ensure that any previously unidentified cultural heritage encountered during construction is appropriately protected, reported, and managed in coordination with the competent authorities. This approach aims to safeguard cultural heritage values while enabling Project activities to proceed in a controlled and responsible manner.

## 4.7 Occupational Health and Safety

Baseline occupational health and safety (OHS) conditions within the Project Area reflect the characteristics of rural economic activities, where employment is predominantly informal or seasonal and largely associated with agriculture, livestock grazing, and small-scale services. Formal occupational health and safety management systems are generally limited outside regulated industrial activities.

Existing risks related to occupational health and safety primarily arise from agricultural practices, use of machinery, animal handling, and road traffic. Access to emergency response services and healthcare facilities is available through nearby settlements and district centers, although response times may vary depending on location.

These baseline conditions provide the context for assessing Project-related occupational health and safety risks, particularly during the construction phase, when the presence of construction equipment, heavy vehicles, and a larger workforce may introduce new or elevated risks. The baseline assessment informs the development of Project-specific OHS measures aligned with national legislation and international standards.

## 4.8 Community Health, Safety and Security

### 4.8.1 Existing Infrastructure

Communities within the Project Area rely on existing local infrastructure, including rural road networks, electricity distribution systems, water supply facilities, and basic public services. Infrastructure capacity is generally adequate for current levels of use but may be sensitive to increased demand during construction activities, particularly in relation to traffic and access routes.

Baseline conditions indicate that existing infrastructure plays an important role in daily community life and supports agricultural and livestock-related activities. These conditions have been considered in evaluating potential Project interactions with community infrastructure.

### 4.8.2 Traffic and Transportation

Traffic conditions within the Project Area are characterized by low to moderate vehicle volumes, primarily associated with local residents, agricultural machinery, and limited

commercial transport. Road infrastructure consists mainly of rural and secondary roads, some of which may have limited capacity or safety features.

Baseline traffic conditions provide a relatively calm environment for communities. Any increase in vehicle movements associated with Project construction has therefore been identified as a potential community health and safety consideration.

### 4.8.3 Hazardous Materials Management

Under baseline conditions, the use and storage of hazardous materials within the Project Area are limited and mainly related to agricultural inputs such as fuels, fertilizers, and pesticides. There are no known large-scale hazardous material storage or handling facilities within the immediate vicinity of the Project.

These baseline characteristics inform the assessment of potential risks associated with the introduction of fuels, oils, and other hazardous materials during Project construction and operation.

### 4.8.4 Emergency Preparedness and Response

Emergency preparedness and response within the Project Area are primarily managed through local and regional authorities, including emergency medical services, fire brigades, and law enforcement agencies. Communities rely on these services for response to accidents, fires, and other emergencies.

Baseline assessments indicate that while emergency response services are available, coordination and response times may vary depending on location and access. These conditions provide the baseline context for evaluating the Project's emergency preparedness and response requirements and the need for coordination with local authorities.

# 5 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

## 5.1 Land Use, Geology, Soil and Natural Hazard Potential

Construction of the SPP, ancillary facilities, and the ETL will result in temporary and permanent interactions with land use and soil resources. Permanent land take will be limited to the SPP footprint and discrete ETL tower foundation areas, while temporary land use may occur along access roads and construction working areas.

Ground disturbance associated with foundation works and site preparation may result in localized soil compaction, loss of topsoil, and increased erosion risk if not appropriately managed. However, no large-scale excavation or activities affecting deep geological structures are anticipated. The Project Area is located in a seismically active region; nevertheless, no site-specific geological constraints have been identified that would prevent safe construction and operation when appropriate design standards are applied.

**Key Potential Impacts**

- Temporary disturbance of land use during construction activities.
- Permanent loss of limited land areas within the SPP footprint and ETL tower locations.

- Localized soil compaction, erosion, and loss of topsoil during earthworks.
- Increased sensitivity to natural hazards (e.g. seismic activity) if construction and design standards are not properly applied.

**Key Mitigation Measures**

- Minimization of land take through optimized layout of the SPP and careful sitting of ETL towers.
- Restriction of construction activities to designated areas to avoid unnecessary land disturbance.
- Implementation of erosion control measures, particularly during periods of earthworks.
- Application of engineering design standards that account for seismic conditions and local ground characteristics.
- Rehabilitation of temporarily disturbed areas following completion of construction activities.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Soil Management Plan (SMP).*

## 5.2 Hydrology, Hydrogeology and Water Resources

Project construction and operation activities may interact with surface water and groundwater resources through ground disturbance, use of machinery, storage of fuels and hazardous materials, and temporary water consumption during construction. The Project Area does not contain major permanent surface water bodies within the SPP footprint; however, groundwater resources are recognized as a sensitive receptor, particularly given the protected groundwater setting identified within the wider area.

Construction-phase impacts may arise from accidental spills, improper handling of fuels and lubricants, and increased surface runoff from disturbed areas. If not properly managed, such events could pose risks to surface water and groundwater quality. Water demand during construction will be temporary and limited, mainly related to workforce needs, dust suppression, and equipment cleaning. During operation, water use will be minimal and restricted to routine maintenance activities.

The Project does not foresee long-term abstraction of groundwater resources. Water required during construction and operation will be sourced in a controlled manner to avoid adverse effects on local water availability.

**Key Potential Impacts**

- Temporary risk of surface water and groundwater contamination due to accidental spills during construction.
- Localized changes in surface runoff patterns associated with ground disturbance.
- Temporary pressure on local water resources due to construction-phase water demand.
- Increased sensitivity of groundwater resources if hazardous materials are not properly managed.
- Direct discharge of wastewater into the receiving environment.

**Key Mitigation Measures**

- Implementation of spill prevention and response procedures for fuels, oils, and hazardous materials.
- Storage of fuels and hazardous substances in designated, bunded, and controlled areas.
- Regular inspection and maintenance of machinery to prevent leaks and spills.
- Controlled management of construction activities to minimize disturbance and runoff.
- Sourcing of construction water in a manner that avoids pressure on local groundwater resources.
- Immediate cleanup and remediation measures in the event of accidental spills.
- Training of construction personnel on water protection and spill response procedures.
- Collection of wastewater in leak-proof septic tanks and sent to a licensed wastewater treatment plant.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Water Management Plan (WMP), Waste and Wastewater Management Plan (WWMP).*

## 5.3 Air Quality

Potential impacts on air quality are mainly associated with the construction phase of the Project and are expected to be temporary and localized. Construction activities within the SPP area and along the ETL corridor may generate dust emissions due to earthworks, vehicle movements on unpaved roads, material handling, and operation of construction machinery.

Baseline air quality conditions in the Project Area are characteristic of a rural environment with industrial emission sources due to the organized industrial zone. As such, even relatively limited construction-related emissions may be perceptible if not adequately managed, particularly in dry and windy conditions. Sensitive receptors may include nearby settlements, agricultural land users, and seasonal land users.

During the operation phase, air quality impacts are expected to be negligible, as the SPP does not involve combustion processes and operational activities are limited to routine maintenance and occasional vehicle movements.

**Key Potential Impacts**

- Temporary increase in dust levels during construction activities.
- Localized deterioration of air quality near construction areas and access roads.
- Short-term nuisance effects for nearby receptors if dust control measures are not implemented.

**Key Mitigation Measures**

- Application of dust suppression measures, such as water spraying on unpaved roads and active construction areas, particularly during dry conditions.
- Covering of transported materials to prevent dust emissions during transport.
- Limitation of vehicle speeds within the Project Area.
- Regular maintenance of construction machinery to ensure efficient operation and minimize emissions.
- Avoidance of unnecessary idling of vehicles and equipment.

- Adjustment of construction activities during adverse weather conditions, where practicable.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Air Quality Management Plan (AQMP), Occupational Health and Safety Management Plan (OHSMP), Community Health, Safety and Security Plan (CHSSMP).*

## 5.4 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions associated with the Project are expected to arise primarily during the construction phase, mainly from fuel consumption by construction machinery, on-site equipment, and vehicle movements related to material transport and workforce commuting. These emissions are temporary and limited to the duration of construction activities.

During the operation phase, direct GHG emissions from the SPP are expected to be negligible, as electricity generation is based on renewable solar energy and does not involve fuel combustion. Indirect emissions associated with routine maintenance activities and limited vehicle movements are expected to be minimal.

The Project contributes positively to climate change mitigation by generating renewable electricity and displacing electricity generated from fossil fuel-based sources within the national grid. Over its operational lifetime, the Project is therefore expected to result in a net reduction of GHG emissions at the system level.

**Key Potential Impacts**

- Temporary GHG emissions during construction due to fuel consumption by machinery and vehicles.
- Minor indirect emissions during operation associated with maintenance activities.

**Key Mitigation Measures**

- Optimization of construction logistics to minimize vehicle movements and fuel consumption.
- Regular maintenance of construction machinery to ensure efficient fuel use.
- Avoidance of unnecessary idling of vehicles and equipment.
- Preference for efficient equipment and vehicles, where practicable.
- Integration of climate change considerations into Project design and operation, consistent with the Climate Change Risk Assessment.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Air Quality Management Plan (AQMP), Climate Change Risk Assessment (CCRA), Occupational Health and Safety Management Plan (OHSMP), Community Health, Safety and Security Plan (CHSSMP).*

## 5.5 Noise and Vibration

Noise and vibration impacts associated with the Project are expected to occur primarily during the construction phase as a result of earthworks, operation of construction machinery, vehicle movements, and activities related to the installation of the SPP components and ETL towers.

The Project Area is characterized by low baseline ambient noise levels due to its predominantly rural setting. As a result, construction-related noise may be perceptible at nearby sensitive receptors, including settlements, agricultural land users, and seasonal land users, particularly during periods of intensive construction activity. These impacts are expected to be temporary, intermittent, and localized.

Vibration impacts are expected to be limited, as the Project does not involve high-vibration activities such as blasting. Any vibration generated by construction equipment is anticipated to dissipate rapidly with distance and is not expected to affect nearby structures.

During the operation phase, noise and vibration impacts are expected to be negligible. Operational noise sources are limited to inverters and infrequent vehicle movements for maintenance purposes and are not anticipated to cause disturbance to surrounding receptors.

**Key Potential Impacts**

- Temporary increase in noise levels during construction activities.
- Short-term nuisance effects at nearby sensitive receptors if construction activities are not properly managed.
- Minor vibration impacts associated with construction equipment operation.

**Key Mitigation Measures**

- Limitation of construction activities to daytime working hours where practicable.
- Proper maintenance of construction machinery to minimize noise emissions.
- Use of well-maintained and, where feasible, low-noise equipment.
- Implementation of buffer distances between construction activities and sensitive receptors, where feasible.
- Planning and management of vehicle movements to reduce noise impacts on nearby communities.
- Prompt investigation and response to noise-related complaints received from local communities.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Noise and Vibration Management Plan (NVMP), Occupational Health and Safety Management Plan (OHSMP), Community Health, Safety and Security Plan (CHSSMP).*

## 5.6 Waste and Resource Management

Waste generation associated with the Project will occur primarily during the construction phase and will include non-hazardous wastes such as excavated soil, packaging materials, construction debris, and domestic waste generated by the workforce. Limited quantities of hazardous waste, including waste oils, oily rags, spent filters, and contaminated materials, may also be generated during construction and maintenance activities.

During the operation phase, waste generation is expected to be low and largely limited to domestic waste from on-site personnel and small quantities of waste arising from routine maintenance activities. No significant waste streams are anticipated during normal operation of the SPP.

Potential impacts related to waste and resource management may arise if wastes are not properly segregated, stored, transported, and disposed of. Improper waste handling could

result in soil and water contamination, health and safety risks, and visual nuisance, particularly in a rural environment.

**Key Potential Impacts**

- Generation of non-hazardous and hazardous wastes during construction activities.
- Risk of soil and water contamination due to improper handling or storage of hazardous wastes.
- Localized nuisance effects if waste storage and disposal are not adequately managed.
- Inefficient use of resources if waste minimization practices are not applied.

**Key Mitigation Measures**

- Implementation of waste segregation, storage, transport, and disposal procedures in line with the Waste and Wastewater Management Plan (WWMP).
- Separate handling and storage of hazardous wastes in accordance with the Hazardous Materials Management Plan (HMMP).
- Use of licensed contractors and authorized facilities for the transport and disposal of all waste streams.
- Regular inspection of waste storage areas to prevent leaks, spills, or uncontrolled disposal.
- Application of waste minimization, reuse, and recycling principles where practicable.
- Management of wastewater generation and disposal in accordance with the Waste and Wastewater Management Plan (WWMP).
- Training of workers on proper waste handling, segregation, and reporting procedures.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Waste and Wastewater Management Plan (WWMP), Hazardous Materials Management Plan (HMMP), Community Health, Safety and Security Plan (CHSSMP).*

## 5.7 Landscape and Visuality

The Project will introduce new built elements into a predominantly rural landscape, including photovoltaic panel arrays within the SPP area and transmission towers along the ETL. As a result, changes to the existing landscape character and visual environment are anticipated, particularly during the construction phase and the early stages of operation.

Within the SPP footprint, visual impacts will be associated with the presence of solar panels, mounting structures, and ancillary facilities. Given the scale of the Project and the surrounding land use characteristics, these elements may be visible from nearby roads and agricultural areas. However, the visual influence of the SPP will remain largely confined to the immediate Project Area and will not result in widespread landscape transformation.

The ETL, due to its linear nature, may create more dispersed visual effects across the wider area. Transmission towers may be visible from multiple viewpoints along the route, including local access roads and agricultural land. Visual impacts related to the ETL are expected to be localized at individual tower locations and consistent with existing linear infrastructure in the region.

During construction, temporary visual disturbance may occur due to the presence of construction equipment, materials, and workforce activities. These effects are expected to be short-term and will diminish following completion of construction works and site reinstatement.

**Key Potential Impacts**

- Permanent visual change within the SPP footprint.
- Localized visual impacts associated with ETL towers along the transmission corridor.
- Temporary visual disturbance during construction activities.

**Key Mitigation Measures**

- Limitation of construction footprints and temporary working areas to reduce unnecessary visual disturbance.
- Implementation of good housekeeping practices at construction sites to minimize visual clutter.
- Rehabilitation of temporarily disturbed areas following completion of construction activities.
- Management of construction activities to reduce visual disturbance to nearby receptors.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP).*

## 5.8 Biodiversity and Ecosystem

Potential impacts on biodiversity and ecosystems are primarily associated with habitat loss and disturbance resulting from the construction of the SPP, ancillary facilities, and the associated ETL. The scale and nature of these impacts differ between the compact footprint of the SPP and the linear nature of the ETL corridor.

Within the SPP area, construction activities will result in the permanent loss of modified natural habitats. Baseline assessments indicate that these habitats are common at the regional level and do not qualify as Critical Habitat. Nevertheless, the loss is considered permanent and has therefore been treated as a material biodiversity impact within the ESIA.

The ETL represents a linear source of impact extending across a wider area. While the physical footprint of individual transmission towers is limited, localized and permanent habitat loss will occur at tower foundation locations, along with temporary disturbance in access and working areas. The ETL may also result in limited habitat fragmentation effects; however, these are expected to be minor due to the discrete and dispersed nature of the infrastructure.

A Critical Habitat Assessment was undertaken as part of the Biodiversity Assessment process. The assessment confirmed that no Critical Habitat is present within the Project Area. However, in recognition of the permanent habitat loss associated with the Project, a precautionary and proactive approach to biodiversity management has been adopted.

**Key Potential Impacts**

- Permanent loss of modified natural habitats within the SPP footprint.
- Localized permanent habitat loss at ETL tower locations.
- Temporary disturbance to habitats during construction activities.
- Limited risk of habitat fragmentation associated with linear infrastructure.

**Key Mitigation Measures**

- Application of the mitigation hierarchy, prioritizing avoidance and minimization of impacts where practicable.

- Limitation of construction footprints and access routes to reduce unnecessary habitat disturbance.
- Rehabilitation of temporarily disturbed areas following construction.
- Implementation of biodiversity protection and monitoring measures in line with the Biodiversity Management Plan (BMP).
- Management of risks related to invasive alien species in accordance with the Invasive Alien Species Management Procedure (IASMP).
- Implementation of biodiversity enhancement and management actions defined under the Biodiversity Action Plan (BAP).
- Adoption of a No Net Loss (NNL) approach to address permanent habitat loss, implemented through the No Net Loss Plan (NNLP) and Framework.

***Relevant plans and procedures:*** *Biodiversity Management Plan (BMP), Invasive Alien Species Management Procedure (IASMP), Biodiversity Action Plan (BAP), No Net Loss Plan (NNLP) and Framework.*

## 5.9 Socio-Economic Environment

### 5.9.1 Demography, Economy and Employment

The Project Area is characterized by a predominantly rural socio-economic structure, with livelihoods largely dependent on agriculture, livestock grazing, and seasonal land use activities. Employment opportunities outside land-based activities are relatively limited at the local level. As such, the Project is expected to interact with local socio-economic conditions mainly during the construction phase.

Temporary positive effects may arise from short-term employment opportunities and demand for local goods and services during construction. These benefits are expected to be limited in duration and scale. During the operation phase, employment requirements will be minimal and ongoing socio-economic interactions will be limited.

### 5.9.2 Vulnerable Groups

Certain groups within the Project Area are considered more vulnerable to Project-related changes due to their reliance on land-based livelihoods and limited access to alternative income sources. This includes households dependent on agriculture and livestock grazing, as well as Yörük communities whose livelihoods are based on seasonal practices and mobility.

Temporary or permanent restrictions on land access, if not appropriately managed, may disproportionately affect these groups. Vulnerable groups have therefore been identified as a key social sensitivity within the ESIA.

### 5.9.3 Land Use

Construction of the SPP and ETL will require permanent land take within the SPP footprint and at ETL tower locations, as well as temporary land use restrictions during construction. These requirements may affect existing agricultural activities and grazing practices on a localized basis.

Potential land use impacts are expected to be limited and manageable, provided that mitigation measures are implemented and access restrictions are minimized in duration and scope, and that affected land users are adequately informed.

### 5.9.4 Infrastructure, Social Services and Ecosystem

Construction activities may result in temporary pressure on local infrastructure, particularly rural roads and access routes. However, significant impacts on social services such as education and healthcare are not anticipated, given the limited scale and temporary nature of construction activities.

Ecosystem services, including pastureland and agricultural production, may be temporarily affected by land take and access restrictions. These impacts are closely linked to land use and livelihood considerations and are addressed through land and livelihood management measures.

### 5.9.5 Labor and Working Conditions

Socio-economic impacts related to labor and working conditions are expected to arise primarily from the employment of construction workers. Potential risks include working conditions, occupational health and safety, and access to grievance mechanisms.

These risks are managed through Project-specific labor and accommodation arrangements and are further assessed under the Human Rights Impact Assessment (HRIA).

**Key Potential Impacts**

- Temporary disruption to land-based livelihoods during construction.
- Sensitivity of vulnerable groups, including Yörük communities, to land access restrictions.
- Localized impacts on agriculture and grazing activities.
- Short-term positive effects through temporary employment.

**Key Mitigation Measures**

- Early and continuous stakeholder engagement in line with the Stakeholder Engagement Plan (SEP) including Grievance Mechanism.
- Clear communication on construction schedules and land access arrangements.
- Minimization of land access restrictions and timely restoration of access.
- Implementation of livelihood-related mitigation measures in accordance with the Livelihood Restoration Plan (LRP).
- Provision of accessible grievance mechanisms for affected communities through the SEP including Grievance Mechanism.
- Management of labor-related risks in line with the Labor Management Plan (LMP) and Accommodation Management Plan (AMP), where applicable.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP) including Grievance Mechanism, Livelihood Restoration Plan (LRP), Labor Management Plan (LMP), Accommodation Management Plan (AMP).*

## 5.10 Land Acquisition, Resettlement and Livelihood

Land acquisition and land use requirements associated with the Project relate to the development of the SPP, ancillary facilities, and the installation of towers along the ETL. These requirements may result in permanent land take within the SPP footprint and at discrete ETL tower locations, as well as temporary land use restrictions during construction activities.

The ESIA confirmed that the Project does not involve physical displacement of residential structures. However, economic displacement may occur where land is used for agricultural production, grazing, or other livelihood activities. Temporary access restrictions during construction may also affect land users if not carefully managed.

Land-based livelihoods, including traditional and seasonal practices associated with Yörük communities, have been identified as particularly sensitive to changes in land access and use. Even localized or temporary restrictions may have implications for such livelihoods if not appropriately mitigated.

**Key Potential Impacts**

- Permanent loss of land within the SPP footprint and at ETL tower locations.
- Temporary restriction of access to land used for agriculture and grazing.
- Economic impacts affecting land-based livelihoods.
- Increased sensitivity of Yörük communities and other land-dependent households to changes in land access.

**Key Mitigation Measures**

- Minimization of permanent land take through optimized Project layout and ETL tower siting.
- Limitation of temporary land use restrictions to the shortest feasible duration.
- Early identification of affected land users and transparent communication regarding land access requirements.
- Provision of compensation and livelihood restoration measures, where applicable, in accordance with the Livelihood Restoration Plan (LRP).
- Ongoing engagement with Project affected persons (PAP) through the Stakeholder Engagement Plan (SEP) including Grievance Mechanism.
- Provision of accessible and responsive grievance mechanisms to address land- and livelihood-related concerns.

***Relevant plans and procedures:*** *Livelihood Restoration Plan (LRP), Stakeholder Engagement Plan (SEP) including Grievance Mechanism.*

## 5.11 Cultural Heritage

Potential impacts on cultural heritage are primarily associated with ground-disturbing activities during the construction of the SPP, ancillary facilities, and particularly the ETL. Due to its linear nature and the need for tower foundations, the ETL corridor presents a higher likelihood of interaction with cultural heritage resources compared to the compact SPP footprint.

Baseline studies and consultations with relevant authorities were undertaken to identify known cultural heritage assets within and around the Project Area. These assessments informed Project design and routing decisions, with the objective of avoiding direct impacts on identified

cultural heritage assets wherever practicable. As a result, no direct impacts on known cultural heritage assets are anticipated under normal Project implementation.

However, given the historical context of the region, the possibility of encountering previously unidentified archaeological remains during excavation works cannot be fully excluded. Such chance finds could occur particularly during foundation works and other activities involving soil disturbance.

**Key Potential Impacts**

- Risk of disturbance to previously unidentified cultural heritage during construction.
- Temporary interruption of construction activities in the event of chance finds.
- Potential reputational and regulatory risks if cultural heritage is not properly managed.

**Key Mitigation Measures**

- Implementation of cultural heritage protection measures in accordance with the Cultural Heritage Management Plan (CHMP).
- Application of a Chance Find Procedure (CFP) to ensure that any unexpected discoveries are promptly identified, protected, and reported to the competent authorities.
- Suspension of works in the vicinity of chance finds until appropriate assessment and clearance are obtained.
- Training of construction personnel on cultural heritage awareness and chance find procedures.
- Coordination with relevant authorities to ensure compliance with national legislation and good international practice.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Cultural Heritage Management Plan (CHMP), Chance Find Procedure (CFP).*

## 5.12 Occupational Health and Safety

Occupational health and safety (OHS) risks associated with the Project are expected to arise primarily during the construction phase, due to the nature of construction activities, including operation of heavy machinery, working at height, electrical works, manual handling, and increased vehicle movements. These risks are typical for large-scale infrastructure projects and are not considered unusual in nature.

During the operation phase, OHS risks are expected to be significantly lower, as the SPP and ETL will require a limited number of personnel for routine operation and maintenance activities. Operational risks are mainly related to electrical safety, maintenance works, and occasional site access.

**Key Potential Impacts**

- Risk of occupational accidents and injuries during construction activities.
- Exposure of workers to physical hazards associated with machinery, electrical works, and working at height.
- Health and safety risks during operation if maintenance activities are not properly managed.

**Key Mitigation Measures**

- Implementation of occupational health and safety controls in line with the Occupational Health and Safety Management Plan (OHSMP).
- Conduct of task-specific risk assessments prior to construction and maintenance activities.
- Provision and mandatory use of appropriate personal protective equipment (PPE).
- Delivery of OHS training and induction programs for all workers prior to commencement of work.
- Implementation of safe working procedures for high-risk activities, including electrical works and working at height.
- Monitoring and reporting of incidents and near misses, with corrective actions implemented as necessary.

***Relevant plans and procedures:*** *Occupational Health and Safety Management Plan (OHSMP), Emergency Preparedness and Response Plan (EPRP).*

## 5.13 Community Health, Safety and Security

### 5.13.1 Existing Infrastructure

Project construction activities may interact with existing community infrastructure, including rural roads, access routes, and local utilities. Increased use of access roads and temporary changes to traffic patterns may affect infrastructure that is primarily designed for low traffic volumes.

Potential impacts on existing infrastructure are expected to be temporary and localized, provided that construction activities are appropriately planned and managed.

**Key Mitigation Measures**

- Planning of construction activities and access routes to minimize pressure on existing infrastructure.
- Coordination with local authorities where necessary to manage temporary infrastructure-related issues.
- Implementation of community safety measures in accordance with the Community Health, Safety and Security Management Plan (CHSSMP).

### 5.13.2 Traffic and Transportation

Increased traffic during the construction phase, including heavy vehicles transporting materials and equipment, may pose risks to community health and safety, particularly along rural roads used by local residents, agricultural vehicles, and livestock.

Traffic-related risks are expected to be most pronounced during peak construction periods and are temporary in nature.

**Key Mitigation Measures**

- Implementation of traffic safety and routing measures in line with the Traffic Management Plan (TMP).

- Use of designated transport routes and scheduling of vehicle movements to reduce disruption.
- Installation of warning signage and communication with local communities regarding construction traffic.
- Coordination with local authorities as required.

### 5.13.3 Hazardous Materials Management

The use, storage, and transport of fuels, oils, and other hazardous materials during construction and operation may pose risks to community health and safety if not properly managed. Potential impacts include accidental spills and uncontrolled exposure to hazardous substances.

**Key Mitigation Measures**

- Management of hazardous materials in accordance with the Hazardous Materials Management Plan (HMMP).
- Storage of hazardous materials in designated and controlled areas.
- Implementation of spill prevention and response measures.
- Training of personnel on safe handling and emergency response procedures.

### 5.13.4 Community Exposure to Diseases

The temporary presence of construction workers may increase interaction between workers and local communities. While no significant health risks are anticipated, there is potential for increased exposure to communicable diseases if preventive measures are not implemented.

**Key Mitigation Measures**

- Implementation of health and hygiene measures for workers in line with the Community Health, Safety and Security Management Plan (CHSSMP).
- Provision of health awareness information to workers.
- Coordination with local health authorities where necessary.
- Management of worker accommodation arrangements, where applicable, in line with the Accommodation Management Plan (AMP).

### 5.13.5 Security Management

Security risks associated with the Project are expected to be limited. However, construction sites, equipment, and materials may require basic security arrangements to prevent unauthorized access and ensure community safety.

Security measures will be designed to be proportionate and respectful of local communities.

**Key Mitigation Measures**

- Implementation of security arrangements in line with the Community Health, Safety and Security Management Plan (CHSSMP).
- Training of security personnel on appropriate conduct and interaction with communities.
- Avoidance of excessive or force-based security practices.

### 5.13.6 Emergency Preparedness and Response

Potential emergency situations related to the Project may include traffic accidents, fires, hazardous material spills, and other incidents that could affect workers and surrounding communities.

**Key Mitigation Measures**

- Establishment and implementation of emergency response procedures in accordance with the Emergency Preparedness and Response Plan (EPRP).
- Coordination with local emergency services and authorities.
- Training of workers on emergency response actions and communication protocols.
- Regular review and updating of emergency response arrangements as required.

***Relevant plans and procedures:*** *Environmental and Social Management Plan (ESMP), Community Health, Safety and Security Management Plan (CHSSMP), Traffic Management Plan (TMP), Hazardous Materials Management Plan (HMMP), Accommodation Management Plan (AMP), Emergency Preparedness and Response Plan (EPRP).*

# 6 HUMAN RIGHTS IMPACT ASSESSMENT (HRIA)

The Human Rights Impact Assessment (HRIA) has been conducted as an integral component of the ESIA to identify and assess potential human rights risks associated with the Project. The assessment places particular emphasis on labor rights, working conditions, occupational health and safety, and supply chain–related considerations. The HRIA has been prepared in line with applicable international standards, including the United Nations Guiding Principles on Business and Human Rights.

The HRIA focuses primarily on potential risks related to Project workers, including those employed by contractors and subcontractors, as well as workers within the Project's supply chain. Potential human rights impacts on local communities are addressed under other relevant sections of the ESIA, including socio-economic conditions, land acquisition and livelihoods, community health and safety, and stakeholder engagement.

The scope of the HRIA includes labor and working conditions, occupational health and safety, non-discrimination and equal opportunity, prohibition of child labor and forced labor, freedom of association and collective bargaining, and access to effective grievance mechanisms. These issues have been assessed for both the construction and operation phases of the Project, with particular attention to the construction phase, during which workforce size and subcontractor involvement are highest.

During the construction phase, the engagement of multiple contractors and subcontractors may give rise to risks related to working conditions, occupational health and safety practices, and effective oversight of subcontracted labor. These risks are typical for large-scale infrastructure projects and are addressed through Project-specific management systems and contractual requirements. Supply chain–related risks were also reviewed, particularly with respect to the sourcing of construction materials, equipment, and services. While no Project-specific high-risk supply chains have been identified, the HRIA recognizes the importance of ongoing due diligence and monitoring in line with international good practice.

**Key Human Rights Risks Identified**

- Potential risks related to labor and working conditions of construction workers, including contracted and subcontracted personnel.
- Occupational health and safety risks associated with construction activities, including machinery operation, electrical works, and working at height.
- Potential gaps in oversight and monitoring of contractors, subcontractors, and suppliers if not adequately managed.
- Risks related to awareness of and access to effective grievance mechanisms for Project workers.

**Key Management Measures**

- Implementation of labor standards and employment conditions in accordance with the Labor Management Plan (LMP).
- Management of occupational health and safety risks in line with the Occupational Health and Safety Management Plan (OHSMP) and applicable national legislation.
- Contractual requirements and monitoring mechanisms to ensure that contractors and subcontractors comply with Project labor, health, safety, and human rights requirements.
- Provision of accessible, confidential, and non-retaliatory grievance mechanisms for workers, in line with the Labor Management Plan and the Stakeholder Engagement Plan (SEP) including Grievance Mechanism.
- Integration of human rights considerations into procurement and supply chain management processes, supported by ongoing due diligence and supervision.
- Management of worker accommodation–related risks, where applicable, in accordance with the Accommodation Management Plan (AMP).

***Relevant plans and procedures:*** *Labor Management Plan (LMP), Occupational Health and Safety Management Plan (OHSMP), Stakeholder Engagement Plan (SEP) including Grievance Mechanism, Accommodation Management Plan (AMP).*

# 7 CLIMATE CHANGE RISK ASSESSMENT

A Climate Change Risk Assessment (CCRA) has been carried out to assess the Project's exposure to physical climate risks and to evaluate its resilience under current and future climate conditions. The assessment has been prepared in line with international good practice, including the requirements of Equator Principles IV, the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), and the physical risk framework of the Intergovernmental Panel on Climate Change (IPCC).

The scope of the CCRA focuses on physical climate risks, as the Project's combined Scope 1 and Scope 2 greenhouse gas emissions are well below the threshold requiring an assessment of climate transition risks. Climate-related hazards relevant to the Project Area were identified based on observed climate data and future climate projections and assessed in relation to both the SPP and the ETL.

The assessment considered key climate hazards relevant to the region, including increasing temperatures and heatwaves, drought and water scarcity, heavy rainfall and flooding, strong winds and storms, hail events, wildfires, and localised soil erosion. These hazards were

evaluated by considering their probability of occurrence, the exposure of Project components and workers, and their vulnerability over the Project's operational lifetime.

**Key Climate Risks Identified**

- Increased temperatures and more frequent extreme heat events, which may affect equipment performance and worker health and safety.
- Prolonged dry periods and drought conditions, potentially increasing dust accumulation on solar panels and placing pressure on local water resources.
- Heavy rainfall events that may cause localised flooding, runoff, or temporary disruption to access roads and drainage systems.
- Strong winds, storms, and hail events that may pose risks to structural components if not adequately designed and maintained.
- Low-probability but potentially impactful hazards such as fires and localised soil erosion.

**Key Adaptation and Management Measures**

- Selection of photovoltaic modules, electrical equipment, and structural components designed to withstand high temperatures, wind loads, and extreme weather conditions.
- Implementation of water-efficient and dry panel cleaning methods to reduce reliance on freshwater resources under drought conditions.
- Application of occupational health and safety measures, including heat-stress management, adaptive work planning, and suspension of works during extreme weather events.
- Integration of climate resilience considerations into operation, maintenance, and emergency preparedness planning, with periodic review of climate risks over the Project lifetime.

In addition to addressing physical climate risks, the Project contributes positively to climate change mitigation by generating renewable electricity and reducing reliance on fossil fuel-based power generation. Greenhouse gas emissions associated with the construction phase are temporary and limited, while the operational phase is expected to deliver long-term climate benefits.

***Relevant plans and procedures:*** *Climate Change Risk Assessment (CCRA), Environmental and Social Management Plan (ESMP), Emergency Preparedness and Response Plan (EPRP).*

# 8 CUMULATIVE IMPACTS

Cumulative impacts may arise where the Project interacts with other existing or reasonably foreseeable developments within the wider area. As part of the ESIA, a cumulative impact assessment was undertaken to evaluate the combined environmental and social effects of the SPP, the ETL, and other activities in the surrounding region.

The assessment considered cumulative effects in relation to land use, biodiversity, traffic, and community health and safety, taking into account existing infrastructure, energy facilities, industrial areas, agricultural activities, and grazing practices within the wider Project Area.

Potential cumulative impacts on biodiversity were assessed with particular focus on habitat loss and fragmentation associated with linear infrastructure. While cumulative pressures on

modified natural habitats were identified, no Critical Habitat is present within the Project Area. With the implementation of mitigation measures, including the Biodiversity Management Plan and the No Net Loss approach, cumulative biodiversity impacts are not expected to be significant.

Cumulative impacts related to traffic, dust, noise, and community health and safety were also considered, particularly during the construction phase. These impacts are expected to be temporary and manageable through appropriate planning, traffic management measures, and ongoing stakeholder engagement.

Overall, the cumulative impact assessment concluded that the Project, when considered together with other existing and foreseeable developments, is not expected to result in significant adverse cumulative environmental or social impacts, provided that the mitigation measures identified in the ESIA are effectively implemented.

Figure 5 shows the cumulative impact area and other facilities considered in the ESIA.

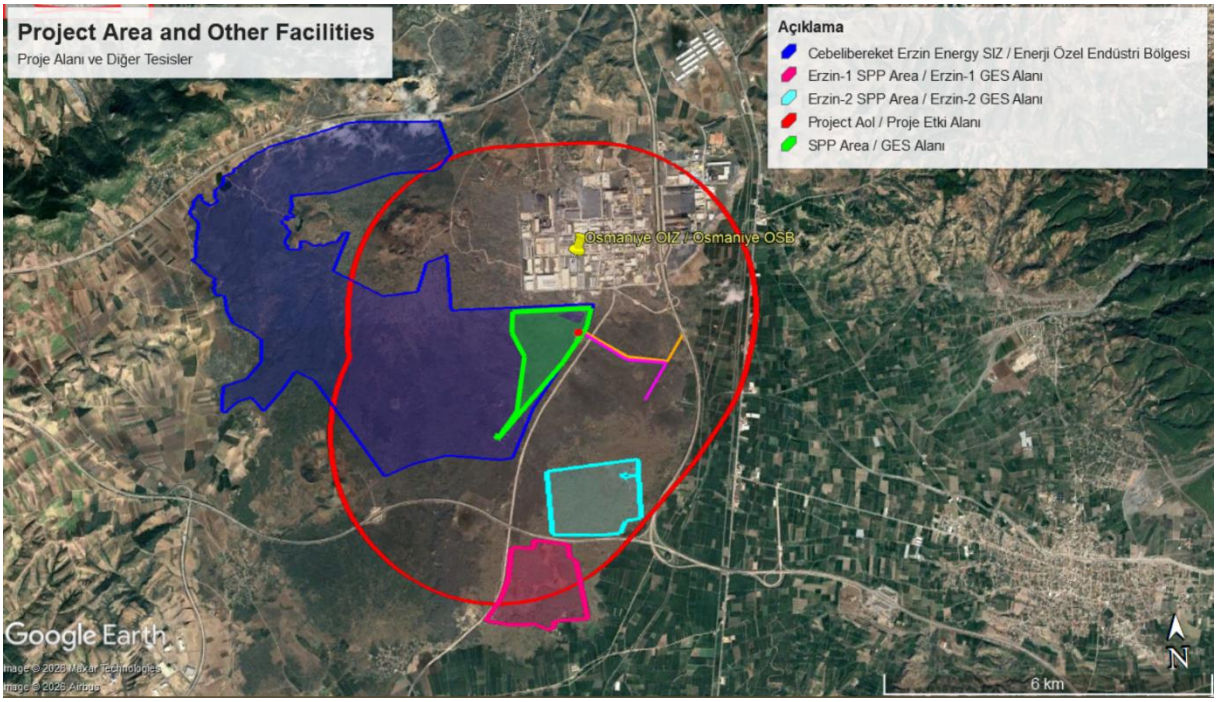


*Figure 5. Cumulative Impact Area of the Project and Other Facilities*

# 9 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

## 9.1 ESMS Overview

An Environmental and Social Management System (ESMS) has been established for the Project to ensure that environmental and social risks and impacts identified in the ESIA are effectively managed throughout the construction and operation phases. The ESMS provides a structured framework for implementing mitigation measures, monitoring performance, and ensuring compliance with national legislation and applicable international lender requirements.

The ESMS is designed to be a dynamic system, allowing for adaptive management and continuous improvement based on monitoring results, stakeholder feedback, and changes in Project activities.

## 9.2 ESMS Structure and Responsibilities

The ESMS is implemented through a clearly defined organizational structure involving the Project Company, the Engineering, Procurement and Construction (EPC) Contractor, the associated facility operator, and subcontractors. Roles and responsibilities are aligned with contractual arrangements and reflect the governance framework defined in the ESIA.

- **Project Company – Tosyalı Demir Çelik Sanayi Anonim Şirketi (Tosyalı)**
  - Overall responsibility for implementation of the ESMS and compliance with national legislation and applicable lender requirements.
  - Oversight of environmental, social, occupational health and safety performance during construction and operation phases.
  - Coordination with financing parties, authorities, and key stakeholders.
- **Engineering, Procurement and Construction (EPC) Contractor – İnojen Enerji Teknolojileri ve Yatırımları Anonim Şirketi (İnojen)**
  - Responsible for engineering, procurement, and construction activities until the end of the construction phase.
  - Day-to-day implementation of environmental, social, and occupational health and safety requirements under the ESMS.
  - Supervision and coordination of subcontractors.
  - Reporting of environmental and social performance, incidents, and corrective actions to the Project Company.
- **Associated Facility Operator – Türkiye Elektrik İletim Anonim Şirketi (TEİAŞ)**
  - State-owned entity responsible for electricity transmission, including planning, establishment, ownership, and operational control of transmission facilities.
  - Assumes ownership and operational responsibility from the transmission system connection point.
  - Where connection is made via another facility's switchyard, retains authority over the connected feeder and may delegate operation and maintenance to the relevant facility for a fee.
  - Coordinates with the Project Company to ensure consistency with ESIA commitments and relevant lender requirements for the Energy Transmission Line (ETL), as an associated facility.
- **Subcontractor for the Energy Transmission Line (ETL) – Mast Enerji ve Teknolojileri A.Ş. (Mast)**
  - Responsible for the construction of the Energy Transmission Line of the Project.
  - Implements applicable environmental, social, and occupational health and safety measures under the supervision of the EPC Contractor and in coordination with TEİAŞ, where relevant.

- **Subcontractor for Land Leveling and Excavation – Kocabey Hafriyat Nak. ve İnş. Taah. Tic. Ltd. Şti. (Kocabey)**
    - Responsible for land leveling and excavation works under the supervision of the EPC Contractor.
    - Compliance with Project ESMS requirements and applicable management plans during construction activities.
- **Environmental and Social Team**
    - Monitoring of Project activities against ESIA commitments and management plans.
    - Support to reporting, corrective actions, and continuous improvement of ESMS implementation.

The detailed organizational charts for the land preparation and construction phase are given in Figure 6 and for the operation phase is provided in Figure 7.

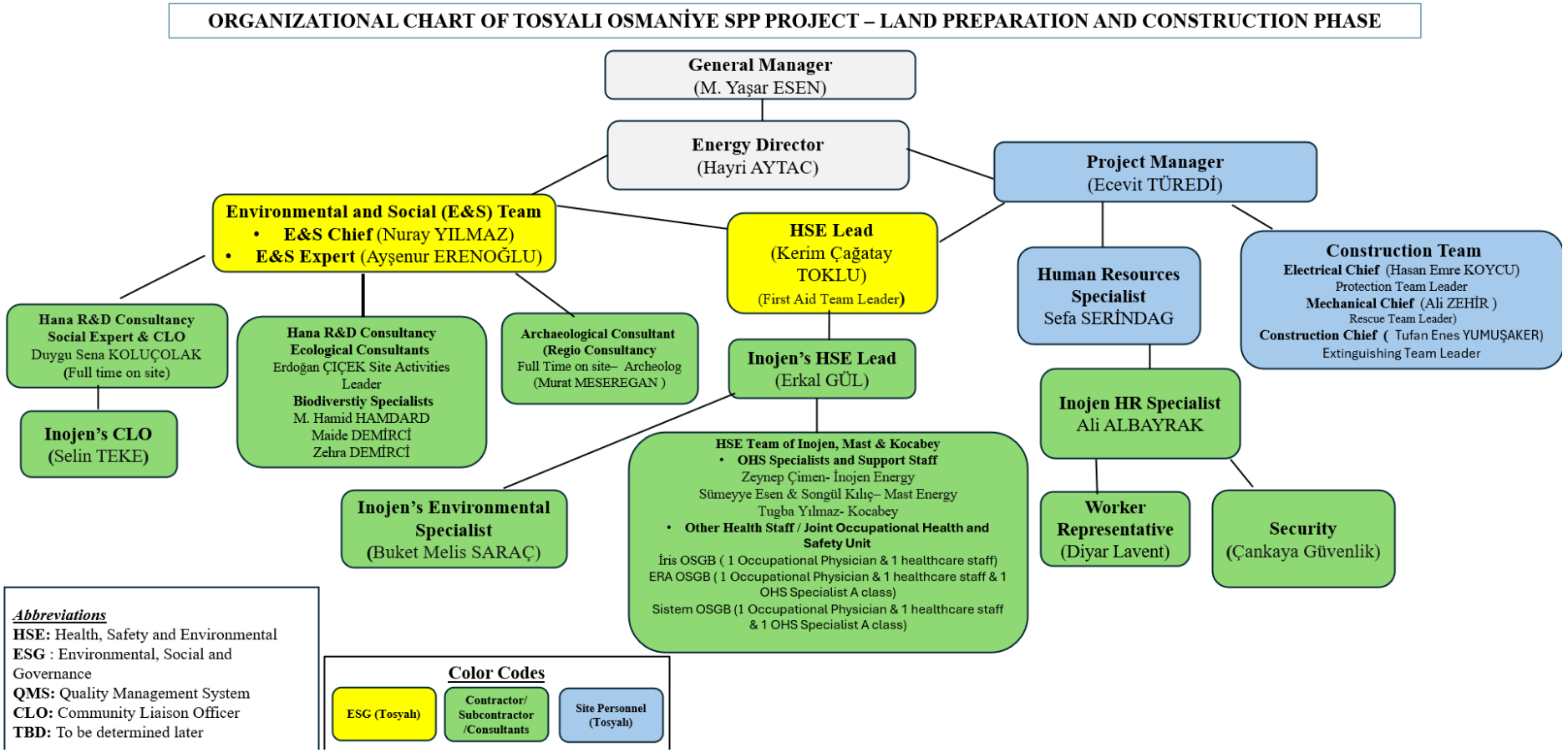


*Figure 6. Organizational Chart of the Project Owner for Land Preparation and Construction Phase*

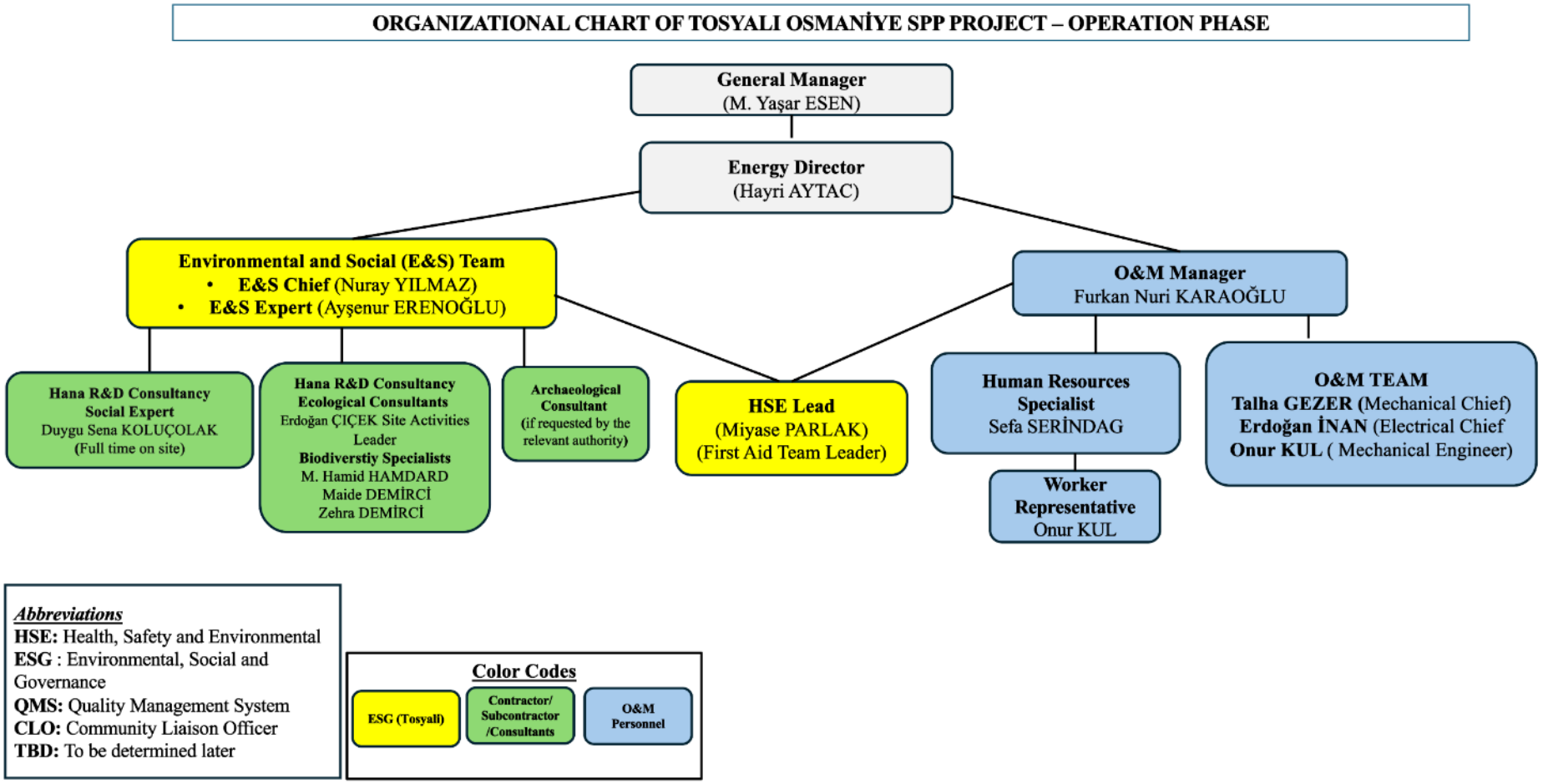


*Figure 7. Organizational Chart of the Project Owner for Operation Phase*

## 9.3 Management Plans under the ESMS

The ESMS is supported by a comprehensive suite of management plans and procedures developed to address specific environmental and social risks and impacts associated with the Project. These plans collectively ensure systematic implementation of mitigation and monitoring measures.

**Environmental Management**

- Environmental and Social Management Plan (ESMP)
- Water Management Plan (WMP)
- Soil Management Plan (SMP)
- Air Quality Management Plan (AQMP)
- Noise and Vibration Management Plan (NVMP)
- Waste and Wastewater Management Plan (WWMP)
- Hazardous Materials Management Plan (HMMP)

**Biodiversity Management**

- Biodiversity Management Plan (BMP)
- Invasive Alien Species Management Procedure (IASMP)
- Biodiversity Action Plan (BAP)
- No Net Loss Plan (NNLP) and Framework

**Social and Labor Management**

- Stakeholder Engagement Plan (SEP) including Grievance Mechanism
- Labor Management Plan (LMP)
- Contractor Management Plan (CMP)
- Accommodation Management Plan (AMP)
- Livelihood Restoration Plan (LRP)

**Health, Safety and Emergency Management**

- Occupational Health and Safety Management Plan (OHSMP)
- Community Health, Safety and Security Management Plan (CHSSMP)
- Traffic Management Plan (TMP)
- Emergency Preparedness and Response Plan (EPRP)

**Cultural Heritage Management**

- Cultural Heritage Management Plan (CHMP)
- Chance Find Procedure (CFP)

## 9.4 Monitoring, Reporting and Corrective Actions

Environmental and social performance is monitored throughout Project implementation to verify compliance with ESIA commitments and management plans. Monitoring results are documented and reviewed regularly to identify any non-compliances or emerging risks.

Where deviations are identified, corrective actions are implemented in a timely manner to prevent recurrence. Reporting mechanisms are in place to ensure that relevant information is communicated internally and, where required, to external stakeholders and financing parties.

### 9.5 Continuous Improvement

The ESMS incorporates a continuous improvement approach, allowing the Project to respond effectively to changing conditions and new information. Lessons learned during implementation, monitoring outcomes, stakeholder feedback, and audit findings are used to strengthen management practices and enhance overall environmental and social performance over the Project lifecycle.

## 10 STAKEHOLDER ENGAGEMENT

Stakeholder engagement for the Project has been planned and is being implemented in accordance with the Stakeholder Engagement Plan (SEP), prepared in line with national legislation and international good practice. The SEP aims to ensure timely, transparent, and inclusive engagement with stakeholders throughout the construction and operation phases of the Project.

Stakeholder engagement activities are designed to support effective communication, manage expectations, identify concerns at an early stage, and provide accessible channels for feedback and grievance submission.

### 10.1 Stakeholder Identification

Stakeholders have been identified based on their potential interest in, or influence by, the Project. Key stakeholder groups include:

- Local communities located within or near the Project Area
- Project-affected persons (PAPs), including land users and landowners
- Seasonal and mobile users of land, including nomadic groups
- Local authorities and administrative units
- Relevant public institutions
- Project workers and contractors
- Other interested parties, including non-governmental organizations where relevant

### 10.2 Stakeholder Engagement Activities

Engagement activities have been undertaken and will continue throughout the Project lifecycle, with approaches tailored to different Project phases and stakeholder groups.

**Pre-construction and Construction Phase**

- Disclosure of Project-related information through meetings, announcements, and publicly accessible materials.
- Direct engagement with affected land users and local communities.
- Ongoing communication with local authorities and relevant institutions.

**Operation Phase**

- Continued information sharing regarding Project operations and potential impacts.
- Maintenance of communication channels to receive feedback and concerns from stakeholders.

Engagement activities are conducted in a culturally appropriate manner and in a language accessible to stakeholders.

### 10.3 Ongoing Engagement and Information Disclosure

Stakeholder engagement is an ongoing process. Information disclosure and consultation activities are supported by clear communication channels, allowing stakeholders to raise questions, provide feedback, and express concerns throughout the Project lifecycle.

Information disclosed under the SEP includes Project scope, construction activities, potential impacts, mitigation measures, and grievance mechanisms. Disclosure materials are made available in Turkish, and where relevant, additional formats are used to ensure accessibility.

### 10.4 Integration with the Grievance Mechanism

Stakeholder engagement activities are closely linked with the Project's grievance mechanisms, ensuring that concerns raised by stakeholders are addressed in a timely and transparent manner. Details of the grievance mechanisms for external stakeholders and workers are provided in Section 11 of this Non-Technical Summary.

**Relevant plans and procedures:**

*Stakeholder Engagement Plan (SEP) including Grievance Mechanism, Livelihood Restoration Plan (LRP), Labor Management Plan (LMP).*

## 11 DISCLOSURE & GRIEVANCE MECHANISM

### 11.1 Disclosure of the Project Information

Project-related environmental and social documentation will be disclosed in accordance with national legislation, international lender requirements, and the provisions of the Stakeholder Engagement Plan (SEP).

As a minimum, the following documents will be disclosed and made available to stakeholders and financing parties:

- Environmental and Social Impact Assessment (ESIA), including the Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)
- Human Rights Impact Assessment (HRIA) (incorporated into the ESIA)
- Climate Change Risk Assessment (CCRA) (a standalone document)
- Information on the grievance mechanisms

Disclosure will be carried out through the following means:

- Online disclosure via the Project Company's website and/or other appropriate online platforms.
- Hard copies of the ESIA Non-Technical Summary (NTS), SEP, and HRIA summary will be made available to local stakeholders in Turkish at accessible locations within the Project Area.

Documents will be disclosed in Turkish and English, as appropriate, to ensure accessibility for both local stakeholders and financing parties.

In line with data protection requirements, the Livelihood Restoration Plan (LRP) will be disclosed in a redacted format, ensuring that no personal or sensitive information of Project-Affected Persons (PAPs) is disclosed.

During the disclosure period, stakeholders will be provided with the opportunity to submit feedback and comments via email and other communication channels defined under the SEP.

## 11.2 External Grievance Mechanism

An external grievance mechanism has been established for Project-affected communities and other external stakeholders in accordance with the Stakeholder Engagement Plan (SEP). The grievance mechanism is designed to be accessible, transparent, culturally appropriate, and free of charge.

Key features of the external grievance mechanism include:

- Multiple entry points for grievance submission, including written, verbal, and electronic channels.
- Clear procedures for grievance registration, assessment, response, and resolution.
- Defined timelines for acknowledging and responding to grievances.
- Communication of outcomes to complainants in an appropriate and timely manner.

Stakeholders may submit grievances anonymously if they wish. All grievances will be recorded, tracked, and addressed without retaliation.

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.projegelistirme@tosyaliholding.com.tr
- Phone: 0216 544 36 00
- For ethical issues: 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)

Project site

- Address: Osmaniye İli Toprakkale İlçesi Türkmen Büyüktüysüz Köyü 246 Ada 2 Parsel
- Contact person of Tosyalı: Duygu Sena KOLUÇOLAK (CLO)
- Phone number of contact person: 0530 930 2546
- Contact person of İnojen: Selin TEKE (CLO)
- 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/

Other channels;

*Presidency's Communication Center (CIMER)*

CİMER 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 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.

## 11.3 Workers' Grievance Mechanism

A separate grievance mechanism is available for Project workers in line with the Labor Management Plan (LMP). The workers' grievance mechanism allows workers to raise concerns related to working conditions, occupational health and safety, and other labor-related issues.

The mechanism ensures:

- Confidentiality and protection against retaliation.
- Timely and fair resolution of grievances.
- Accessibility for all categories of workers, including contractors and subcontractors.

The contact person's information, who has a responsibility for the implementation of Project's Worker Grievance Mechanism 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.

Detailed explanations regarding the external and internal grievance mechanism are given under the Project-specific SEP.

## 11.4 Feedback, Monitoring and Continuous Improvement

All grievances and feedback received through the grievance mechanisms will be monitored and reviewed to identify recurring issues and opportunities for improvement. Where necessary, corrective actions will be implemented, and grievance management procedures will be updated to enhance effectiveness.