TOSÇELİK NİĞDE SOLAR POWER PLANT PROJECT

Human Rights Impact Assessment (HRIA)

Detailed Content Summary – Key Findings, Methodology, Risks and Management Measures

Based on the approved HRIA (Volume V – Appendix B)

TOSÇELİK Profil ve Sac

1. What the HRIA covers

• Assesses potential adverse human rights impacts of the Niğde Solar Power Plant Project on affected stakeholders, including workers and community members.

• Builds on the Preliminary HRIA undertaken during ESIA Scoping and develops the identified risks into a more detailed assessment of nature, scale, likelihood and significance.

• Uses a lifecycle perspective: risks may arise through Project activities, contractors, subcontractors, primary supply chain relationships and interactions with affected communities.

• Applies a prevention–mitigation–remedy approach, with the objective of preventing, minimizing and addressing adverse impacts while identifying opportunities for positive outcomes.

• Key overall conclusion: no risk combining very high likelihood with critical severity was identified; most risks are low-to-medium priority, while Gender Equality & GBV Protection and Migrant Workers' Rights are high-priority areas.

The HRIA is not only a list of human rights topics: it links Project activities and right-holders to specific risks, priority levels and concrete management measures.

2. HRIA objective and assessment evolution

From preliminary screening to detailed human rights impact assessment

ESIA Scoping – Preliminary HRIA

Early identification of project-specific and salient human rights risks, with particular attention to vulnerable groups. The screening informed the scope and focus of the subsequent assessment.

ESIA Stage – Detailed HRIA

Consolidates the preliminary findings and evaluates risks in terms of nature, scale, likelihood and significance; defines mitigation and management measures aligned with international standards and good international industry practice.

Lifecycle approach

The assessment also considers activities not explicitly designed to affect human rights but capable of creating direct or indirect impacts on workers, local communities and other stakeholders.

3. Applicable human rights principles

Frameworks used to identify corporate responsibility and due diligence expectations

- UN Guiding Principles on Business and Human Rights (UNGPs): corporate responsibility to respect human rights and conduct due diligence to identify, prevent, mitigate and account for impacts.
- Equator Principles IV (EP4): financial institutions and clients share responsibility for addressing human rights risks within financed projects.
- ILO conventions and fundamental principles: used particularly for labour and working-condition risks.
- UNGP Principles 11–15 establish the core logic: avoid causing or contributing to adverse impacts; address impacts when they occur; and seek to prevent or mitigate impacts directly linked through business relationships.
- Continuous assessment, monitoring and management of human rights impacts are emphasized rather than a one-off assessment.

4. HRIA report structure

The presentation follows the logic of the approved report

01
Introduction

02
Project Overview

03
Context & Human Rights Baseline

04
Stakeholder Engagement

05
Human Rights Assessment

06
Conclusion

07
References

5. Project developer and corporate context

- TOSYALI Group is a Türkiye-based industrial conglomerate focused primarily on steel manufacturing and related industries.
- Tosçelik Profil ve Sac Endüstrisi A.Ş. is the TOSYALI subsidiary responsible for development of the Niğde SPP.
- The corporate context is relevant because the HRIA assesses not only Project-level risks but also the policies and management systems through which TOSYALI/Tosçelik intends to control them.

6. TOSYALI/Tosçelik ESG and human-rights commitments

Existing policies and management commitments form part of the mitigation framework

Policy / instrument	Relevance to HRIA
Environmental Policy	Pollution prevention; resource efficiency; climate action; ecosystem protection; stakeholder engagement/GM; sustainable supply chain
ESG Policy	Environmental sustainability; social responsibility; OHS; governance and ethics
OHS Policy	Zero-accident goal; training; PPE; emergency preparedness; monitoring; contractor compliance
Human Rights Policy	UNGP/OECD/IFC/EP/UN Global Compact alignment; no discrimination, forced/child labour, harassment or exploitation; due diligence and confidential GM
Social Impact & Inclusivity	Community rights; fair compensation/livelihood loss; vulnerable groups; gender equality; GBVH zero tolerance; access to information
Supply Chain / Codes	Supplier due diligence, labour standards, environmental compliance, anti-corruption; Codes apply to contractors/subcontractors

02

PROJECT OVERVIEW

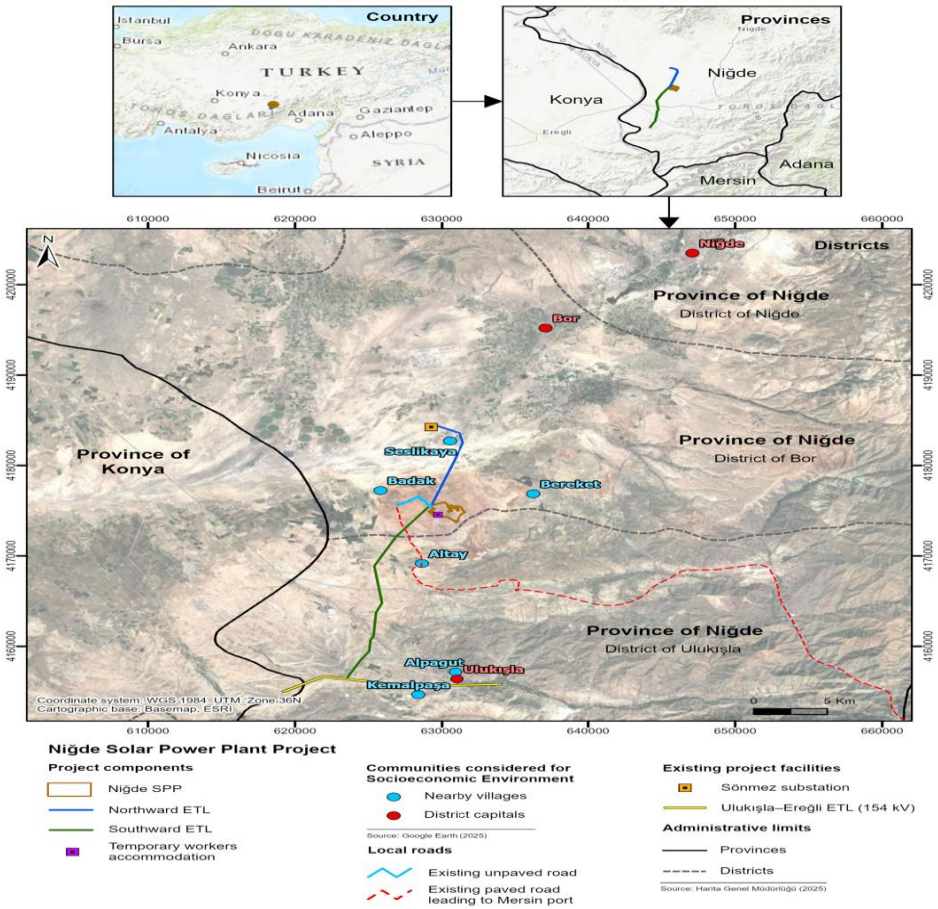
Project characteristics that define the human-rights exposure pathways

TOSÇELİK Profil ve Sac

7. Project overview – core components

Scale and physical footprint are important for understanding the risk pathways

- Niğde SPP: approximately 196 ha.
- 193,050 monocrystalline bifacial half-cut PV modules (725 Wp).
- 27 containerised Solar Power Stations (SPS), each integrating inverter, transformer, RMU and LV/MV systems.
- Installed DC capacity: approximately 140 MWp; approved AC export capacity: 100 MWe.
- On-site 154 kV substation of approximately 1 ha.
- Two 154 kV ETLs: northward 10.48 km / 31 towers; southward 20.77 km / 64 towers.



8. Primary supply chain and human-rights interface

The HRIA identifies internationally sourced solar components and related due-diligence needs

Origin	Material / component	Quantity indicated	Transport
China	Aluminium frames	6,300 sets / 20,700 kg	Train
China	EPE / EPA materials	31,623.9 m² each	Train
China	Solar light redirecting film	77 m²	Ship
China	Solar cells	13,200 kg + 12,559 N-type units	Train / Air
Malaysia	Solar glass	8,680 kg	Air
Potential: India / UK / Spain	Solar power station; controls/SCADA; trackers; cables; electrical components	To be confirmed	—

Human-rights relevance

The HRIA recommends stronger human-rights due diligence and traceability for primary suppliers, particularly where sourcing regions may present forced-labour, child-labour or freedom-of-association risks.

9. Construction workforce

Workforce scale creates a significant labour-rights management interface

Construction period
Approximately 12 months

Workforce estimate
Approximately 300–400 workers during construction

Operation phase
The HRIA identifies a smaller operational workforce; the rights-holder table estimates 25 workers.

- Workers include direct TOSÇELIK employees as well as contractor and subcontractor workers.
- Potential labour-rights exposure includes working conditions, differential treatment of subcontractor workers, discrimination, freedom of association and collective bargaining.
- Supply-chain workers are relevant to the extent required by IFC PS2 and are addressed through supplier/subcontractor controls.
- Workforce influx and interaction with surrounding communities also create community-level human-rights interfaces.

03

CONTEXT & HUMAN RIGHTS BASELINE

International and national context used to interpret Project-specific risks

TOSÇELİK Profil ve Sac

10. International corporate human-rights frameworks

The baseline reviews four principal business-and-human-rights reference frameworks

UN Global Compact

Ten principles covering human rights, labour, environment and anti-corruption; provides a corporate responsibility reference.

GRI (Global Reporting Initiative)

Sustainability reporting framework used to contextualise disclosure and accountability expectations.

OECD Guidelines

Responsible business conduct and due-diligence expectations for multinational enterprises.

ISO 26000

Guidance on social responsibility, including human rights, labour practices, community involvement and fair operating practices.

11. International human-rights baseline

Global findings provide the external context against which Project risks are interpreted

- UN reports, international government reports and Human Rights Watch reporting are reviewed as sources of contextual human-rights information.
- The baseline identifies the relevance of internationally recognised civil and political rights, economic/social/cultural rights, labour rights and rights of vulnerable groups.
- The assessment does not treat country-level context as a Project impact by itself; rather, it uses the context to understand potential exposure and vulnerability.
- Human-rights due diligence therefore considers both the Project's own activities and broader conditions that may increase vulnerability or affect the effectiveness of safeguards.

12. Türkiye human-rights baseline: governance, civil freedoms and poverty

Key contextual factors identified in the HRIA

Governance / institutional context

The HRIA recognises Türkiye's constitutional and institutional framework for the protection of human rights, while also considering the implementation and institutional context relevant to the Project and its stakeholders.

Civil freedoms

Freedom of expression, peaceful assembly and association are recognised and protected within Türkiye's constitutional and legal framework, and the HRIA also considers the broader social and institutional context relevant to stakeholder engagement and participation.

Social conditions / poverty

Türkiye's socioeconomic context, including demographic and labour-market characteristics, regional differences, employment trends and the integration of migrant and refugee communities, is considered as part of the broader context relevant to the Project and its stakeholders.

Project relevance

These contextual factors are important when assessing vulnerability, labour inclusion, access to information, participation and the ability of affected people to seek remedy.

13. Applicable laws, regulations and standards

National law and international standards form the assessment benchmark

- Türkiye's 1982 Constitution establishes fundamental rights and freedoms; Article 90 gives duly ratified fundamental-rights treaties force of law and precedence over domestic legislation in case of conflict.
- National legislation relevant to the Project includes labour and OHS requirements, equality and non-discrimination, gender-based violence, child protection, disability rights and protection of foreigners/international-protection applicants.
- Türkiye is party to key UN human-rights treaties and the European Convention on Human Rights, providing an established international framework for the protection of human rights.
- Project-level international benchmarks include Equator Principles IV, IFC Performance Standards and relevant ILO conventions.
- The HRIA considers Turkish legal requirements alongside relevant international human-rights standards and the UNGPs.

Source: HRIA §§3.4–3.4.3, pp.52–60

04

STAKEHOLDER ENGAGEMENT

What stakeholders said, how concerns were framed as human-rights issues, and how remedy is provided

TOSÇELİK Profil ve Sac

14. Stakeholder engagement – approach and purpose

Engagement is treated as an iterative, two-way human-rights due-diligence input

- Regular and meaningful engagement with affected communities, individuals and other relevant stakeholders is identified as essential to identifying and managing human-rights impacts.
- The SEP was developed during Scoping. Stakeholders were identified based on interest in the Project, potential impact/influence, and ability to provide commentary on Project issues.
- ESIA-phase engagement included local residents, local representatives, governmental institutions, nearby businesses and vulnerable groups/focus groups.
- Engagement covered living conditions, livelihoods, access to resources, non-discrimination, participation and access to grievance mechanisms.
- The HRIA reports no significant human-rights findings from the fieldwork itself; most interviewees had no additional comments or specific human-rights concerns. However, several recurring expectations and sensitivities were identified.

15. Stakeholder concerns – local communities and representatives

The dominant message is positive support, conditional on local benefits and controlled impacts

Stakeholder	Overall position	Main expectations	Main sensitivities
Local residents	Generally positive toward clean energy, investment and economic benefits	Local jobs; youth employment; local hiring; village benefits	Agricultural/grazing land; livestock; nature; temperature; fenced access
Local representatives	Awareness varied; information often through mukhtars/word-of-mouth	Employment and community support	Agricultural productivity and land reduction; unequal access to information

Human-rights framing

Employment expectations → right to work and non-discrimination. Land/agriculture/livestock concerns → adequate standard of living, food, livelihoods and resource access. Information gaps → right to information, meaningful participation and effective grievance mechanisms.

16. Stakeholder concerns – institutions, businesses and vulnerable groups

Vulnerability is linked to livelihoods, information access and inclusion

Group	Engagement finding	Expectation	Human-rights relevance
Government institutions	Clean-energy investment generally welcomed	Agriculture/livestock remain key livelihoods	Drought, water scarcity, declining productivity, income stability
Nearby businesses	Local experience with similar projects	Training/capacity building viewed as more sustainable than one-off support	Misinformation and sustainability of local support
Vulnerable groups	Agriculture/livestock are challenging due to water, climate and geography	Direct local employment	Migrants report lower information access and social inclusion; women/elderly require attention

Cross-cutting recommendation

Continue regular disclosure; maintain accessible feedback and grievance channels; prioritise local employment; provide sustainable training/support; ensure vulnerable groups can participate meaningfully.

17. Grievance Mechanism (GM/GRM)

1

Accessible channels

Face-to-face, local authorities and contacts; culturally appropriate access.

2

Pre-construction tailoring

A complete labour and community GRM will be tailored to local reality and disseminated before construction.

3

Inclusive communication

Community meetings, local authorities, posters, flyers, social media, SMS and QR code; verbal channels for people with limited literacy.

4

GBV / SEA / SH channel

Separate channel; confidential, survivor-centred and focused on safety, choices, dignity and wellbeing.

5

Tracking & feedback

Grievances registered in the database; response timelines explained; records/resolutions verified monthly; SEP updated as a living document.

05

HUMAN RIGHTS ASSESSMENT

Rights-holders, methodology, scoped risks, priority levels and mitigation

18. Key affected rights-holders and duty-bearers

The HRIA distinguishes those potentially affected from those responsible for protecting/respecting rights

Group	Who	Human-rights interface
Local communities	Badak, Bereket, Seslikaya, Alpagut, Altay Kemalpaşa	Noise/dust, traffic, worker influx and other community interfaces
Vulnerable groups	Female-headed households, elderly, persons with disabilities, migrants and culturally sensitive groups	Inclusion, information access, discrimination and livelihood vulnerability
Landowners/users	Agricultural plots along ETL corridor	Potential economic displacement, compensation and access
Project workers	Direct, contractor, subcontractor and relevant supply-chain workers	Working conditions, discrimination, OHS, freedom of association, wages/hours
Duty-bearers	State actors + TOSÇELIK/Project and relevant contractors/supply chain	State protection obligations; corporate responsibility to respect and remedy

19. Risk and impact assessment methodology

STEP 1

Identification

Review of universally recognised human-rights standards + stakeholder/right-holder engagement during ESIA fieldwork.

STEP 2

Classification

Determine whether rights are potentially at risk / occurring; evaluate severity through scale, scope and irremediability, plus likelihood.

STEP 3

Prioritisation

Prioritise by severity and probability, while considering existing controls and right-holder vulnerability; severe and ongoing/likely impacts are addressed first.

Three sequential steps are applied to identify, classify and prioritise risks

Severity = scale + scope + irremediability | Likelihood = probability

Critical severity triggers additional mitigation measures. All identified impacts should ultimately be addressed, even where lower priority.

20. Human-rights priority matrix

Severity is assessed first; likelihood then determines overall priority

	Unlikely	Likely	Very likely
Low	Low	Low	Medium
Medium	Low	Medium	High
High	Medium	High	Critical
Critical	High	Critical	Critical

Priority logic

Severity reflects seriousness, breadth and difficulty of remedy. Existing controls and vulnerability also inform prioritisation. Risks assessed as severe and ongoing/likely receive the earliest attention.

21. Potential human-rights risks – labour and working conditions

The risk register considers both direct workforce and supply-chain interfaces

Risk area	Potential exposure	Likelihood / Severity	Priority
Child labour / modern slavery	Underage work; forced labour / debt bondage	Unlikely / High	Medium
Freedom of association	Practical obstacles to unionisation / collective bargaining	Likely / Medium	Medium
Wages & working hours	Excessive overtime; inadequate wages	Likely / Medium	Medium
Job security / right to work	Arbitrary termination; unfair treatment	Unlikely / Medium	Low
Access to remedy	Workers/communities may not understand or trust the GM	Unlikely / Medium	Low

Management direction

LMP/EWMP, formal contracts, age verification, supplier/subcontractor audits, working-time records, union rights, worker GM, and Supplier Code of Conduct are central controls.

22. Potential risks – civil, property and environmental rights

Several medium-priority risks arise at the community/ETL interface

Risk area	Potential exposure	Likelihood / Severity	Priority
Security / right to life	Excessive use of force by private/state security	Unlikely / High	Medium
Property / expropriation	Inadequate compensation along ETL corridor	Unlikely / High	Medium
Freedom of movement	Restricted access to land / construction zones	Likely / Medium	Medium
Dust & noise	Construction emissions affecting communities	Likely / Medium	Medium
Water	Pressure on local water resources	Unlikely / High	Medium

Key implication

The HRIA links these risks to SMP, fair/transparent compensation and LRP, TMP, ESMP dust/noise controls, water management and accessible stakeholder communication.

23. Potential risks – culture, vulnerable groups and inclusion

The highest-priority risks are concentrated in gender and migrant-worker interfaces

Risk area	Potential exposure	Likelihood / Severity	Priority
Cultural heritage	Damage to archaeological/cultural sites	Unlikely / High	Medium
Social cohesion	Labour influx and community tensions	Unlikely / Medium	Low
Gender equality & GBV	Sexual harassment / discrimination	Likely / High	HIGH
Migrant workers	Poor accommodation / unequal conditions	Likely / High	HIGH
Disability rights	Exclusion in recruitment/access	Likely / Medium	Medium

Why the two High priorities matter

Both are assessed as likely and high in severity. The HRIA therefore calls for strengthened preventive, confidential reporting, inclusion and monitoring measures.

24. Scoped-in versus scoped-out human-rights topics

Only rights considered relevant to the Project context are carried into detailed impact assessment

SCOPED IN

These rights are carried into detailed impact assessment and mitigation planning.

- Child labour
- Freedom of association
- Modern slavery / forced labour
- Access to effective GM and remedy
- Job security / right to work
- Non-discrimination
- OHS / right to life & security
- Right to property
- Freedom of movement
- Right to water
- Cultural life / heritage
- Disability rights
- Minorities / migrants
- Women's rights

SCOPED OUT

Excluded because they are not considered significant to the Project's specific context, typology, AoI or operational characteristics, with rationale provided in the HRIA.

- Social insurance
- Freedom of expression (project level)
- Privacy
- Right to education (standalone)
- Right to health (standalone category)
- Indigenous Peoples' rights

25. Consolidated impact assessment – risk register

The detailed table links rights, risk source, impact, priority and embedded mitigation

A. Supply chain HR due diligence

Proportionate verification of primary suppliers of PV modules, steel and electrical components; prioritise regions with documented forced-labour, child-labour or freedom-of-association risks.

B. Livelihood restoration for informal users

Formally recognise informal grazing loss within the ~196 ha SPP footprint; consult affected informal users; implement LRP before construction; formalise the periodic grazing-access commitment.

C. Migrant/refugee integration

Vulnerable Groups protocol with Arabic/Dari interpretation where needed; multilingual community liaison; inclusive local hiring and dissemination of job information through mukhtar networks.

D. Gender-responsive project plans

Voluntary female workforce target, skills/mentoring support and female-only reporting channels within the GBV/SEA/SH mechanism before worker mobilisation.

25. Consolidated impact assessment – risk register

	Risk Area	Likelihood	Severity	Priority
Labor and Working Conditions	Job Security / Right to Work / Non Discrimination Protection against unfair dismissal	Unlikely	Medium	Low
	Child Labour & Modern Slavery risks	Unlikely	High	Medium
	Freedom of Association Right to form and join trade unions	Likely	Medium	Medium
	Wages and Working Hours Right to fair remuneration and reasonable hours	Likely	Medium	Medium
	Access to Grievance Mechanism Right to effective remedy	Unlikely	Medium	Low

	Risk Area	Likelihood	Severity	Priority
Civil and Political	Right to Life and Security Protection against excessive use of force	Unlikely	High	Medium
	Right to Property and Security Protection against arbitrary expropriation	Unlikely	High	Medium
	Freedom of Movement Right to mobility	Likely	Medium	Medium
Environment	Right to a Healthy Environment Protection from environmental pollution	Likely	Medium	Medium
	Right to Water Access to safe and sufficient water	Unlikely	High	Medium

	Risk Area	Likelihood	Severity	Priority
Economic, Social and Cultural	Right to Health Highest attainable standard of physical and mental health	Unlikely	High	Medium
	Cultural Heritage and Protection of archaeological and cultural sites	Unlikely	High	Medium
	Social Cohesion Right to quality of life	Unlikely	Medium	Low
Gender and Vulnerable Groups	Gender Equality & GBV Protection Protection against discrimination and harassment	Likely	High	HIGH
	Migrant Workers' Rights Protection against exploitation	Likely	High	HIGH
	Disability Rights Equal access to employment	Likely	Medium	Medium

26. Embedded mitigation and management measures

The HRIA relies heavily on measures embedded in Project management systems

Supplier and Subcontractor Management

- Supplier Code of Conduct implementation and monitoring across subcontractors
- Compliance verification, audits and corrective action for labour-related violations
- Stronger due diligence to trace material origins and assess supply-chain labour conditions

Labour Practices and Grievance Mechanism

- Promote worker awareness and trust in the Grievance Mechanism
- Ensure confidentiality and demonstrate effectiveness of the GM
- Implement labour requirements through the LMP and contractor oversight

Community Engagement and Security

- Comprehensive stakeholder engagement addressing the concerns of women, minorities and other vulnerable groups
- Human-rights training for state and private security personnel
- Clear protocols on the appropriate use of force, reporting and prevention of abuses

Gender Equality, Inclusion and Land Acquisition

- Gender-sensitive HR policies to prevent GBV and discrimination
- Proactive inclusion of persons with disabilities and other underrepresented groups
- Fair compensation and livelihood restoration for potential ETL-related displacement
- Alignment with international standards

Core Project Management Frameworks

LMP | Supplier Code of Conduct | Grievance Mechanism | SEP | Security Management Plan | ESMP | OHS systems

27. Additional recommended actions

Four areas were identified through cross-analysis of HRIA, ESIA socioeconomic findings and IFC PS gap analysis

A. Supply Chain Human Rights Due Diligence

- Proportionate human-rights verification of primary suppliers of photovoltaic modules, steel and electrical components
- Priority attention to regions with documented forced labour, child labour or restricted freedom of association risks
- Integrate screening into the Supplier Code of Conduct

B. Livelihood Restoration for Informal Land Users

- Recognise and address loss of informal grazing rights within the approximately 196 ha SPP footprint
- Include users without formal land title, including Afghan pastoral households identified in Badak and Seslikaya
- Develop the LRF with affected informal users and implement before construction
- Formalise periodic grazing access commitment and incorporate it into the LRP

C. Migrant and Refugee Community Integration

- Dedicated Vulnerable Groups engagement protocol
- Arabic and Dari interpretation for GM, consultation and compensation/LRF engagement
- Multilingual community liaison where necessary
- Non-discriminatory local hiring and job dissemination through mukhtar networks

D. Gender-Responsive Design of Project Management Plans

- Voluntary target for female workforce participation during construction
- Skills training and mentoring to support female employment
- Female-only reporting channels within the GBV/SEA/SH mechanism
- Channels operational before worker mobilisation

06

CONCLUSION

What the approved HRIA ultimately says about the Project’s human-rights risk profile

28. Overall HRIA conclusion

Risk profile is manageable, but two areas require strengthened controls

No extreme salient risk identified

No assessed risk combines very high likelihood with critical severity.

Two HIGH-priority risks

Gender Equality & GBV Protection; Migrant Workers' Rights — both assessed as likely and high severity.

Most risks are LOW–MEDIUM

Medium-priority issues include labour conditions, security/use of force, expropriation, movement, dust/noise, OHS, cultural heritage and water.

- Full standalone HRDD is not considered mandatory at this stage; however, strengthened management measures are required for higher-priority risks.
- Implementation of the GBV Policy, confidential reporting, equal standards for migrant workers, Turkish labour-law compliance, SMP, ESMP, OHS systems and SEP is essential to keep residual risks manageable.
- Continuous monitoring, proactive stakeholder engagement and an accessible and trusted grievance mechanism are identified as essential throughout the Project lifecycle.

29. Key findings to carry into ESIA / ESMP implementation

This is the operational message of the HRIA for Project management

Supplier & subcontractor management

Close the gap between existing Codes and effective implementation/auditing across subcontractors and primary suppliers.

Labour practices

Build awareness and trust in the GM; protect confidentiality and demonstrate that complaints lead to effective remedy.

Community engagement

Keep engagement targeted to women, minorities, migrants and other vulnerable groups; maintain regular information disclosure.

Security

Train state/private security personnel on human rights and appropriate use of force; establish clear incident reporting/investigation.

Gender & inclusion

Gender-sensitive HR policies; GBV prevention; equal opportunities for persons with disabilities and other underrepresented groups.

Land & livelihoods

Ensure fair compensation and livelihood restoration for ETL-related impacts and address informal users in accordance with international standards.

Source: HRIA §6, pp.86–88

30. Final implementation message

The HRIA should be treated as a live management input, not a standalone report

- Integrate HRIA findings and controls into ESIA and ESMP implementation processes.
- Translate high-priority risks into explicit responsibilities, procedures, training, reporting and monitoring requirements.
- Maintain continuous stakeholder engagement and ensure the GM remains accessible, trusted and responsive.
- Monitor women workers, migrant/refugee groups, informal land users and other vulnerable right-holders with proportionate, targeted measures.
- Use the findings to reinforce trust with workers, local communities, authorities and lenders throughout the Project lifecycle.

Core message

The Project's human-rights risks are considered largely manageable when the identified safeguards and strengthened measures are effectively implemented and monitored.

Source: HRIA §6, pp.87–88

31. Principal references used in the HRIA

The report draws on international, national and Project-specific sources

- United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Equator Principles IV (EP4).
- IFC Performance Standards on Environmental and Social Sustainability (2012).
- ILO Declaration on Fundamental Principles and Rights at Work and relevant ILO conventions.
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023).
- ISO 26000 Guidance on Social Responsibility; GRI reporting framework; UN Global Compact.
- Türkiye legislation and constitutional framework; relevant international human-rights treaties.
- Country/context sources cited in the HRIA, including UN, European Commission, Council of Europe, Human Rights Watch, World Bank, UNHCR and OSCE/ODIHR.
- Project-specific ESIA, SEP, management plans, stakeholder engagement and socioeconomic baseline information.

Source: HRIA §7, pp.89–94