TOSÇELİK PROFİL VE SAC ENDÜSTRİSİ A.Ş.

TOSÇELİK NİĞDE SOLAR POWER PLANT PROJECT, TÜRKİYE

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

STAKEHOLDER ENGAGEMENT PLAN

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ABBREVIATIONS & ACRONYMS

AoI	Area of Influence
BAP	Biodiversity Action Plan
BMP	Biodiversity Management Plan
CA	Corrective action
CİMER	Presidency's Communication Center
ÇINAR	ÇINAR Engineering Consultancy Incorporated
CLO	Community Liaison Officer
CSOs	Civil society organisations
DDY	State Railways Administration
DVIG	Disadvantaged or Vulnerable Individuals or Groups
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EKAT	Electrical Power Current Facilities
EP	Equator Principle
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institution
EPRP	Emergency Preparedness and Response Plan
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESG	Environmental, Social, and Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
ETL	Energy Transmission Line
EWMP	Employment and Workforce Management Plan
FGD	Focus Group Discussion
FGM	Feedback and Grievance Mechanism
FPIC	Free, Prior and Informed Consent
GBV	Gender-Based Violence
GRC	Grievance Redressal Committee
GRM	Grievance Redress Mechanism
HR	Human Resources

HRIA	Human Rights Impact Assessment
HSSES	Health, Safety, Security, Environmental and Social
I&APs	Interested and Affected Parties
ICP	Informed consultation and participation
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IMP	Interface Management Plan
IP	Indigenous Peoples
KBA	Key Biodiversity Areas
KPI	Key Performance Indicator
LMP	Labor Management Plan
LRP	Livelihood Restoration Plan
MRM	Management Review Meetings
NGOs	Non-Governmental Organizations
NTS	Non-technical summary
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PS	Performance Standard
QDE	QUADRANTE – Engenharia e Consultoria, S.A.
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPP	Solar Power Plant
TBMM	Grand National Assembly of Türkiye
TEİAŞ	Turkish Electricity Transmission Company
TİHEK	The Human Rights and Equality Institution of Türkiye
ToR	Terms of Reference
WB	World Bank
WGM	Workers' Grievance Mechanism
YİMER	Foreigners Communication Center

TOSÇELİK NİĞDE SOLAR POWER PLANT PROJECT, TÜRKİYE

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

STAKEHOLDER ENGAGEMENT PLAN

1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the Project. It has been produced by **ÇINAR Engineering Consultancy Incorporated** (ÇINAR) and **QUADRANTE – Engenharia e Consultoria, S.A.** (QDE) on behalf of **Tosçelik**. This SEP was developed at the Environmental and Social Impact Assessment (ESIA) Scoping phase and updated at the detailed ESIA phase.

The SEP is a "living document" and will continue be updated throughout the ESIA process and Project lifecycle as new stakeholders are identified and based on learnings and information received in previous phases of engagement.

1.1 OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

This SEP provides the framework for stakeholder engagement during ESIA disclosure and throughout the construction and operation phases, and will continue to be updated throughout the Project lifecycle, as required.

It ensures that engagement is meaningful, consistent, comprehensive, culturally appropriate, and compliant with relevant national legislation and Lender standards and regulations, as discussed in Section 3.

The public consultation and stakeholder engagement process establishes a foundation for trust-building and the effective management of stakeholder concerns (refer to Table 1.1 for more detail).

This SEP will be updated and expanded during subsequent Project phases to reflect evolving stakeholder interests and Project development progress.

The SEP has been developed to facilitate:

- The transparent and participatory identification of stakeholders related to the ESIA process;
- The establishment of efficient communication channels during this ESIA phase;
- The continuous provision of Project information to stakeholders as the Project progresses;
- The establishment of feedback mechanisms allowing stakeholders to raise issues and concerns about the proposed Project, which are documented and addressed as required;

- An engagement process that demonstrates respect for cultural practices and sensitivities of all stakeholders.

Table 1-1 - Objectives of the Stakeholder Engagement Plan

OBJECTIVE	RATIONAL
Identify relevant stakeholders for the Project	Identify and categorise individuals or organisations that may be affected by the Project or have an effect on how it is implemented. Stakeholder identification is an ongoing process that evolves throughout the Project's lifecycle.
Distribute accurate Project information in an open and transparent manner	Ensure that stakeholders, particularly those directly affected by the proposed Project, have access to all relevant information to make informed comments and plan for the future. This reduces uncertainty and anxiety, while helping stakeholders understand potential impacts, risks, and benefits.
Form partnerships to promote constructive interaction between all parties	Build trust-based relationships between the Project and stakeholders to encourage proactive interactions and avoid unnecessary conflicts based on rumours or misinformation. Clearly defined mechanisms for conflict resolution and grievance handling provide better understanding of stakeholder concerns and expectations.
Record and address public concerns, issues, and suggestions	Document stakeholder issues and comments to allow the rationale for Project decisions to be traced and understood. Records also support audits, thematic analysis of recurring issues, and follow-up engagements with affected people, demonstrating that stakeholder engagement is taken seriously.
Manage stakeholders' expectations	Expectations, both positive and negative, may not align with the Project's realities. Managing expectations around employment opportunities, local development, and temporary disruptions helps reduce future disappointment or frustration, thereby mitigating potential conflict.
Fulfil national and international requirements for consultation	Ensuring compliance with statutory and Lender consultation requirements prevents procedural delays, reduces reputational risks, and avoids potential penalties or fines.

All engagement activities are documented through evidence (see Appendix A), ensuring that feedback and outcomes are formally recorded and integrated into Project decision-making.

1.2 STAKEHOLDERS ADOPTED DEFINITION

For the purposes of this report, stakeholders are regarded as synonymous with Interested and Affected Parties (I&APs) or Project Affected Persons (PAPs).

According to the International Finance Corporation (IFC, 2007), the term "stakeholder" refers to any individual or group who:

- Project beneficiaries – will benefit directly from the Project;

- Project-affected persons – are affected, or are likely to be affected, by the Project but do not necessarily benefit from it;
- Other interested parties – may have an interest in the Project, either positive or negative.

Stakeholders may therefore include:

- Locally affected communities or individuals and their formal or informal representatives;
- National, provincial, or municipal government authorities;
- Traditional or political leaders;
- Civil society organisations (CSOs) and groups with specific interests (e.g., gender, youth, vulnerable populations);
- Academic or research institutions; and
- Private sector entities or other businesses.

In the context of Türkiye, particular importance is given to communities potentially affected within the Project footprint and its area of influence, including rural and peri-urban settlements located in proximity to the proposed solar power facilities, such as the photovoltaic plant, associated access roads, and any grid connection infrastructure related to the Niğde Solar Power Plant Project.

Other relevant stakeholders include public institutions, administrative authorities, and sectoral entities that may not be physically affected by the Project but hold interests in areas such as environmental protection, water resource management, land use and spatial planning, agriculture, and the protection of cultural heritage, which are of particular relevance at local, regional, and national levels within the Turkish context.

1.3 SCOPE

The SEP applies to all personnel of the Project proponent (TOSÇELİK), as well as to the main contractor responsible for Project implementation, and to all subcontractors (service providers and subcontracted companies) and suppliers undertaking activities related to the construction of the Niğde Solar Power Plant (Niğde SPP) Project, during the engineering, procurement, pre-construction, and construction phases.

The scope of this SEP covers the Environmental and Social Impact Assessment phase and the construction phase of the Project, serving as an operational instrument that develops and implements, at the Project level, the principles and guidance established in the Stakeholder Engagement Framework (SEF).

This SEP may be updated and adjusted as the Project progresses, in line with applicable regulatory requirements and the stakeholder engagement needs identified throughout the Project lifecycle.

Engagement plans related to the decommissioning (dismantling) phase will be developed at a later stage, closer to the end of the Project lifecycle, in accordance with applicable national legislation and international good practice.

1.4 APPROACH TO STAKEHOLDER ENGAGEMENT

According to IFC requirements, it is essential to initiate stakeholder engagement during the early stages of project planning to ensure that stakeholders' concerns, issues, and questions are fully incorporated into the ESIA process. Early engagement allows the Project to integrate local knowledge, inform project design and planning, and promote a transparent decision-making process.

Stakeholder engagement must be maintained throughout the entire project lifecycle to ensure the Project's long-term success. This includes engagement during the ESIA process itself, starting with the initial consultations and followed by additional engagement regarding the findings documented in the Scoping and ESIA Reports.

All stakeholder engagement activities for the Project will follow an iterative approach to stakeholder identification and analysis. The overall objectives and approach to engagement are illustrated in Figure 1.1.

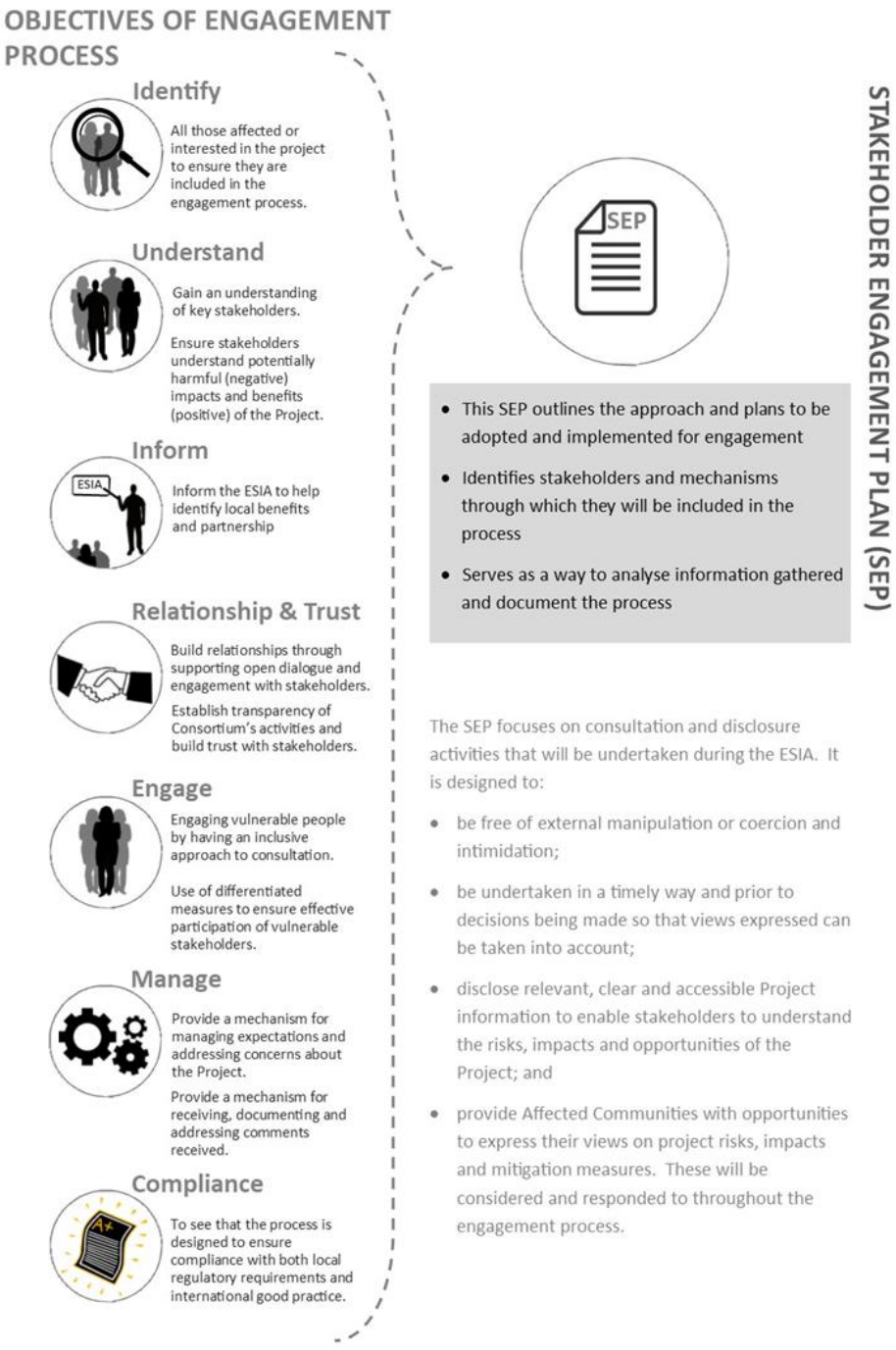


Figure 1-1 - SEP Commitment Objectives

1.5 STRUCTURE OF THIS PLAN

This Stakeholder Engagement Plan is structured as follows:

- **Section 2**: Project Description;
- **Section 3**: National and International Standards and Legislation;

- **Section 4**: Project Stakeholders and Analysis
- **Section 5**: Stakeholder Engagement Program;
- **Section 6**: Stakeholder Engagement Activities;
- **Section 7**: Feedback and Grievance Mechanism;
- **Section 8**: Monitoring and Reporting;
- **Section 9**: References.

In addition to the above-mentioned sections, the report also includes the following Appendix:

- **Appendix A:** Surveys
- **Appendix B:** Field Report

2 PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter presents a general and contextualized description of the Tosçelik Niğde Solar Power Plant Project, hereinafter referred to as the "Project", outlining its nature, location, and purpose within the framework of the Stakeholder Engagement Plan.

The information presented is based on data available at the time of preparation of this document. Any changes to the Project will be incorporated into subsequent versions of the SEP, where relevant to stakeholder engagement processes.

The Project consists of the development of a utility-scale solar photovoltaic power plant located in Niğde Province, in the Central Anatolia region, together with the associated infrastructure required for connection to the national electricity grid. The Project aims to contribute to increasing renewable energy generation, strengthening energy security, and promoting sustainable development at national, regional, and local levels.

2.2 PROJECT BACKGROUND

The Tosçelik Niğde Solar Power Plant Project originates from Türkiye's national strategy to expand electricity generation from renewable energy sources, with the objective of reducing dependence on imported fossil fuels and supporting the transition towards a low-carbon energy system.

The Project is promoted by Tosçelik, a Turkish industrial group with consolidated experience in large-scale industrial and energy investments. As part of its sustainability and energy diversification strategy, Tosçelik has been investing in renewable energy projects, aiming to support cleaner electricity generation and contribute to national energy and climate objectives.

The Project responds to the growing demand for electricity in Türkiye, taking advantage of the high solar potential of Niğde Province. Electricity generation from solar energy will contribute to reducing greenhouse gas emissions associated with conventional power generation, while also strengthening the security and reliability of the national electricity system.

From a geographic perspective, as illustrated in Figure 2-1, the Project is located within the administrative boundaries of Seslikaya Village, in the Bor District of Niğde Province, and includes grid connection infrastructure extending southwards into the Ulukışla District. The Project area is situated in proximity to several rural settlements, namely Badak and Bereket to the north and northeast, as well as Altay, Alpagut, and Kemalpaşa along the transmission line corridor. The Direct Area of Influence (1 km buffer) partially overlaps with these settlements, reflecting their proximity to the Project site and associated infrastructure. The city of Niğde, located to the northeast, represents the main urban, administrative, and socioeconomic centre within the broader area of influence, while Bor and Ulukışla serve as key district-level centres (see Table 2-1).

Table 2-1 – Project Affected Settlements

PROJECT COMPONENT	PROVINCE	DISTRICT	SETTLEMENT	SETTLEMENT TYPE	POPULATION, 2024
Energy Transmission Line (ETL)	Niğde	Ulukışla	Altay	Village	98
ETL	Niğde	Ulukışla	Alpagut	Neighborhood	3,572
ETL	Niğde	Ulukışla	Kemalpaşa	Neighborhood	2,357
Project area / SPP site	Niğde	Bor	Badak	Village	365
ETL	Niğde	Bor	Bereket	Village	285
ETL	Niğde	Bor	Seslikaya	Village	173
				Total population	**6,850**

This investment forms part of the country's broader energy transition efforts, promoting the diversification of the energy mix and the development of sustainable energy infrastructure in Niğde Province, a region with significant potential for solar energy generation.

The Project will contribute to:

- Increasing national electricity generation capacity from renewable energy sources;
- Reducing greenhouse gas emissions associated with conventional electricity generation;
- Strengthening the security and reliability of the national electricity system;
- Creating direct and indirect employment opportunities during the construction and operation phases;
- Stimulating local and regional economic activity through the use of local labour, services, and suppliers; and
- Supporting Türkiye's national energy and climate targets.

In addition to its energy and economic contribution, the Project is aligned with sustainable development principles and international good practice applicable to renewable energy projects, integrating environmental and social considerations from the early stages of planning.

Project implementation will involve the use of modern and efficient technologies designed to minimise environmental impacts, optimise the use of natural resources, and ensure appropriate integration with the surrounding environment and local communities, in compliance with national legal requirements and applicable international environmental and social performance standards.

2.3 PROJECT OVERVIEW

The Project consists of the construction, operation, and future decommissioning of a utility-scale solar photovoltaic power plant, with a planned installed capacity of 140 MWp / 100 MWe, located in Niğde Province, in the Central Anatolia region.

The solar power plant will occupy an area of approximately 280 hectares and will include the following main components:

- A solar photovoltaic field, comprising monocrystalline half-cut photovoltaic modules;
- Inverters, transformer stations, and associated cabling;
- An on-site electrical substation located within the solar power plant area;
- Two high-voltage (154 kV) energy transmission lines, providing connection to the national electricity grid; and
- Internal access roads, auxiliary infrastructure, and monitoring and control systems.

The Project is expected to generate approximately 460 million kWh of electricity per year, which will be supplied to the national electricity grid.

The ETL is composed:

- One 154 kV transmission line, approximately 10 km in length, extending northward and connecting to the Sönmez Solar Power Plant Substation; and
- A second 154 kV transmission line, approximately 21 km in length, extending southward and connecting to the 154 kV DDY[1] Ulukışla–Ereğli transmission line.

2.4 TEMPORAL PROGRAMMING OF THE VARIOUS PHASES

The temporal programming of the Tosçelik Niğde Solar Power Plant Project comprises several distinct phases, ranging from development and preparation to operation and eventual decommissioning. The information presented is indicative in nature and may be refined as the Project design evolves and as the Environmental and Social Impact Assessment is developed.

The design and pre-construction phase includes detailed engineering, permitting, land-related procedures, and other preparatory activities required prior to the commencement of construction. The duration of this phase will depend on the completion of technical studies and the receipt of the relevant regulatory approvals.

The construction phase of the solar power plant is expected to have an approximate duration of 12 months. This phase will involve activities such as site preparation,

[1] State Railways Administration

installation of photovoltaic modules, construction of the on-site substation, installation of high-voltage energy transmission lines, and assembly of the remaining Project components. During this phase, it is estimated that approximately 250 workers will be required, although workforce numbers may vary depending on the progression and nature of construction activities.

Following the completion of construction works, the commissioning phase will take place, during which testing, verification, and grid-connection activities will be carried out to ensure that the solar power plant operates in compliance with technical, safety, and regulatory requirements.

The operation phase of the Project is expected to have an economic lifespan of approximately 25 years. Throughout this period, routine operation, monitoring, maintenance, and repair activities will be undertaken to ensure the safe and efficient performance of the facility. It is anticipated that approximately 25 workers will be employed during the operation phase, with priority given to local residents where feasible.

At the end of its operational life, the Project may enter a decommissioning phase, to be implemented in accordance with applicable legal requirements and international good practice. Decommissioning activities are expected to include the dismantling of equipment, rehabilitation of the Project area, and, where possible, the reuse or recycling of materials. Specific decommissioning measures will be defined at a later stage of the Project lifecycle.

3 NATIONAL AND INTERNATIONAL STANDARDS AND LEGISLATION

3.1 INTRODUCTION

This chapter outlines the national and international legal, regulatory, and good practice frameworks applicable to the Project. It presents the relevant Turkish legislation, Tosçelik's corporate policies, and key international standards, including the Equator Principles, IFC Performance Standards, and the World Bank's Environmental and Social Framework. Together, these instruments establish the legal and institutional basis for stakeholder engagement, environmental and social risk management, land acquisition, grievance mechanisms, and broader sustainability commitments throughout the Project lifecycle.

3.2 TOSÇELIK COMPANY POLICIES

At this stage of the Project, the Developer does have a solid health, safety, environment, quality and social responsibilities policies and procedures that have been constituted for all SPP projects of the Company. All the standalone documents are listed below:

- Request / Complaint / Suggestion Management System Procedure (Document number: PR.01.07.02. dated 03.09.2025);
- Tosyalı Holding SPP Projects Human Resources Policy (Document number: PR.01.06 / dated 29.07.2025);
- Tosyalı Holding SPP Project's Environmental, Social, and Governance ESG9 Policy (Document number: P.01.07/ Doc. Date: 29.07.2025);
- Tosyalı Holding SPP Project's Social Impact and Inclusivity Policy (Document number: P.01.03/ dated 29.07.2025);
- Tosyalı Holding SPP Project's Security Personnel Policy;
- Tosyalı Holding SPP Projects Supply Chain Policy (Document number: P.01.08 / dated 29.07.2025);
- Tosyalı Holding Human Rights Policy and Supplier Code of Conduct
- Supplier Evaluation Procedure (THG.PRO.022);
- Tosyalı Holding SPP Supplier Preliminary Assessment Procedure (Document number: PR.01.07.01);
- Supplier Due Diligence ESG Scoring Tool (F.01.07.09).

3.3 TÜRKIYE LEGISLATION

The relevant national legislation on SEP is summarized in Table 3-1 and Table 3-2.

Table 3-1- Türkiye Legislation related to the Project's Stakeholder Engagement Activities

REGULATION	DATE	NUMBER	RELEVANCE
The Constitution of the Republic of Türkiye	09.11.1982	2709	-
Freedom of Thought and Opinion	-	Article 25	Everyone has freedom of thought and opinion, no one shall be compelled to reveal his/her thoughts and opinions for any

REGULATION	DATE	NUMBER	RELEVANCE
			reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions.
Freedom of Expression and Dissemination of Thought	-	Article 26	Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities.
Health, the Environment and Housing	-	Article 56	Everyone has the right to live in a healthy and balanced environment. It is the duty of the State and citizens to improve the natural environment, to protect environmental health and to prevent environmental pollution.
Conservation of Historical, Cultural and Natural Wealth		Article 63	The State shall ensure the protection of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.
Right of Petition	-	Article 74	Citizens and foreigner resident in Türkiye, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye (TBMM) regarding the requests and complaints concerning themselves or the public.
Law on the Commission for Equal Opportunity between Women and Men	24.03.2009	5840	This law stipulates the establishment of a specialized commission within TBMM of Türkiye to ensure equal opportunities between women and men in Türkiye. The main duties of the commission include monitoring the implementation of legislation related to gender equality, developing policy recommendations, preparing reports based on collected data, and promoting public awareness.
Law on the Human Rights and Equality Institution of Türkiye	06.04.2016	6701	The Law aims to protect human rights, promote equality, and combat discrimination. The law prohibits discrimination based on race, language, religion, gender, disability, and similar grounds. The Human Rights and Equality Institution of Türkiye (TİHEK) was established to enforce the law, address discrimination complaints, and raise public awareness. Complaints are free of charge, and administrative fines may be imposed for violations.
Prime Ministry Circular No. 2010/14 on Increasing Women's Employment and Promoting Equal Opportunities	24.05.2010	14	The circular aims to increase women's employment and promote equal opportunities in Türkiye. It encourages public institutions and private sector organizations to take measures supporting gender equality in the workplace and improving women’s participation in the labor market.
Notification Law	19.02.1959	7201	It is the law that regulates how notifications regarding legal and administrative transactions are made. This law determines the procedures and principles of notifications, and ensures that notifications are made correctly, and on time.
Law on Right to Information	24.10.2023	4982	Adopted on October 24, 2003, the Right to Information Act regulates the right of citizens and legal entities to request information and documents from public institutions and organizations. The primary purpose of the law is to promote a democratic and transparent administration by ensuring public

REGULATION	DATE	NUMBER	RELEVANCE
			access to information and increasing accountability in public services.
Law on Use of the Right to Petition	01.11.1984	3071	Citizens of the Turkish Republic are entitled to apply TBMM and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition No.4982 (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

Table 3-2- Türkiye Legislation related to the Project's E&S Impacts

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND ENVIRONMENTAL LICENSING		
Law / Regulation	**Official Gazette Date**	**Official Gazette Number**
Environmental		
Environmental Impact Assessment (EIA) Regulation	29.07.2022	31907
Environmental Permits and Licenses Regulation	10.09.2014	29115
Electricity Market Law	14.03.2013	28603
Electricity Market Unlicensed Electricity Generation Regulation	12.05.2019	30772
Regulation on Environmental Audit	12.06.2021	31509
Pasture Law	28.02.1998	23272
Regulation Concerning Environmental Management Services	01.11.2022	32000
Social and Human Rights		
The Constitution of the Republic of Türkiye	09.11.1982	2709
Fundamental Characteristics of the State		*Article 2*
Equality Principle		*Article 10*
Freedom of Thought and Opinion	-	*Article 25*
Freedom of Expression and Dissemination of Thought	-	*Article 26*
Right to Education		*Article 42*
Protection of Minorities		*Article 44*
Right to Live in a Healthy Environment		*Article 56*
Turkish Citizenship		*Article 66*
Right of Petition	-	*Article 74*

Law on the Commission for Equal Opportunity between Women and Men	24.03.2009	5840
Law on the Human Rights and Equality Institution of Türkiye	06.04.2016	6701
Prime Ministry Circular No. 2010/14 on Increasing Women's Employment and Promoting Equal Opportunities	24.05.2010	14
Notification Law	19.02.1959	7201
Law on Right to Information	24.10.2023	4982
Law on Use of the Right to Petition	01.11.1984	3071
Cultural Heritage & Patrimony		
Law on Protection of Cultural and Natural Assets	23.07.1983	2863
Definitions		*Article 3*
Obligation to Inform		*Article 4*
Legal Necessities before the Impact Mitigation Measures		*Article 7*
Regulation on Determination and Registration of Immovable Cultural and Natural Heritage	10.12.1987	19660
Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets" of the Ministry of Culture and Tourism of Türkiye	13.03.2013	94949537-160.99-51264
Vulnerable groups		
Law on Persons with Disabilities	07.07.2005	5378
Child Protection Law	15.07.2005	5395
Law on the Protection of Family and Prevention of Violence Against Women	20.03.2012	6284
Social Services Law	27.05.1983	2828
Regulation on Accessibility Monitoring and Inspection	20.07.2013	
Displacement & Expropriation		
Turkish Civil Code	01.01.2002	4721
Equality Before the Law		*Article 2*
Property Right		*Article 683*
Unlimited Nature of Property		*Article 715*
Possession		*Article 722*
Inheritance Right		*Article 727*
Expropriation Law	08.11.1983	2942
Resettlement Law	26.09.2006	5543

Zoning Law	09.05.1985	3194
Settlement Law	26.09.2006	5543
Cadastre Law	09.07.1987	3402
Land Registry Law	29.12.1934	2644
Agricultural Reform Law on Land Arrangement in Irrigation Areas	01.12.1984	3083
Soil Conservation and Land Use Law	19.07.2005	5403
Land Registry Regulation	17.08.2013	5150
Occupational Health and Safety (OHS)		
Occupational Health and Safety Law	30.06.2012	6331
Occupational Health and Safety Risk Assessment Regulation	29.12.2012	28512
Prevention of Major Industrial Accidents and Mitigation of Their Effects Regulation	02.03.2019	30702
Emergency Situations in the Workplace Regulation	18.06.2013	28681
Occupational Health and Safety Services Regulation	29.12.2012	28512
Health and Safety Conditions in the Use of Work Equipment Regulation	25.04.2013	28628
Regulation on Health and Safety Signs	11.09.2013	28762
Occupational Hygiene Measurement, Testing, and Analysis Regulation	27.01.2023	32086
Professional Training for Dangerous and Highly Dangerous Work Regulation	13.07.2013	28706
Regulation on the Employment of Children and Young Workers	06.04.2004	25425
Regulation on Usage of Personal Protective Equipment (PPE) in Workplaces	02.07.2013	28695
Regulation on Road Traffic	18.7.1997	23053
Road Traffic Law	18.10.1983	2918
Regulation on Electrical Power Current Facilities (EKAT)	30.11.2000	24246
Regulation on Protection of Environment and Public Health from Adverse Effects of Non-Ionizing Radiation	24.07.2010	27651
Labour		
The Constitution of the Republic of Türkiye	09.11.1982	2709
Forced Labor		*Article 18*
The Labor Law	22.05.2013	4857
Non-Discrimination and Equal Opportunity		*Article 5*

Collective Dismissal		*Article 29*
Wages and Deductions		*Article 32*
Overtime Work		*Article 41*
Annual Leave		*Article 53*
Working Hours		*Article 63*
Rest Breaks		*Article 67*
Minimum Age		*Article 71*
Special Working Conditions		*Article 73*
The Unions and Collective Agreements Law	07.11.2012	28460
Trade union freedom		Article 25
Others legislation related to Türkiye Requirements for Stakeholder Engagement and Public Consultation		
The EIA Regulation, published in the Official Gazette No. 31907 on 29 July 2022, requires stakeholder engagement in the process of assessing the environmental impacts of projects. Accordingly, for projects listed in Annex-1, the preparation of a SEP is mandatory and it must be submitted as part of the EIA application dossier.		

3.4 PREDICTED LAND ACQUISITION AND DISPLACEMENT

The land required for the solar park areas has already been acquired by the Project Proponent, and no physical resettlement of households or displacement of residents was required. With regard to the transmission line, no physical resettlement is anticipated either. However, limited economic displacement may occur, primarily associated with the installation of transmission line poles/towers and the establishment of right-of-way (RoW) corridors, which may result in land-use restrictions or temporary loss of income. Where applicable, compensation will be provided in accordance with national legislation and relevant international standards.

Permanent land occupation includes the already acquired solar park area, the on-site substation, and the foundations of transmission line poles/towers, as well as the associated right-of-way corridors. Temporary land occupation may occur during the construction phase, particularly for temporary access roads, laydown areas, storage of materials, and working areas required for transmission line installation. Such temporary occupation will be limited to what is strictly necessary, and affected areas will be reinstated following the completion of construction works, where technically feasible.

Current land uses within the Project area and along the transmission line corridor are predominantly agricultural and pastoral, including dryland farming and grazing areas used for livestock activities. There are also undeveloped rural lands and scattered rural infrastructure. No consolidated urban or residential areas have been identified within the directly affected footprint of the Project infrastructure.

The main potentially affected groups include landowners, tenants, and informal land users whose plots may be crossed by the transmission line or where poles/towers may be installed. Small-scale farmers and livestock breeders who rely on these lands for their livelihoods may experience temporary or permanent economic impacts. No direct impacts on residential properties are anticipated; however, nearby communities may experience indirect and temporary disturbances during the construction phase.

Following detailed corridor verification and confirmation of final transmission line pole/tower locations, Project Affected Persons (PAPs) will be informed of parcel-specific land acquisition requirements, easement restrictions, anticipated livelihood impacts, applicable entitlements, grievance mechanisms and implementation procedures. Consultations with PAPs will be documented in accordance with the Project-specific Livelihood Restoration Plan (LRP) and Interface Management Plan (IMP), and will continue throughout the land acquisition and compensation process, as applicable.

3.5 INTERNATIONAL GOOD PRACTICES AND GUIDELINES

3.5.1 EQUATOR PRINCIPLES

The Equator Principles (EPs) are risk management framework adopted by a group of 132 international financial institutions across 38 countries, to identify, assess and manage environmental and social risks in project financing.

The term “Equator” is used since the EPs are to be adopted globally by financial institutions in the northern and southern hemispheres and the equator is equidistant from the two hemispheres. Financial institutions that implement the EPs are known as Equator Principles Financial Institutions (EPFIs).

Of the 10 existing principles, only EP5 and EP6 are relevant to the stakeholder engagement process, public information and disclosure, as well as grievance mechanisms, as illustrated in the Table 3-3.

Table 3-3 - Summary of the Equator Principles requirements

PRINCIPLE	DESCRIPTION
EP5: Stakeholder Engagement	For all Category A and Category B Projects it’s required to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: - the risks and impacts of the Project; - the Project’s phase of development; the language preferences of the Affected Communities; - their decision-making processes; and - the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation. Disclosure of environmental or social risks and adverse impacts should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.

PRINCIPLE	DESCRIPTION
	To facilitate Stakeholder Engagement, the client will, commensurate with the Project's risks and impacts, make the appropriate Assessment Documentation readily available to the Affected Communities, and where relevant Other Stakeholders, in the local language and in a culturally appropriate manner. The client will take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. EPFIs recognize that Indigenous Peoples (IP) may represent vulnerable segments of Project-Affected Communities. All Projects affecting IP will be subject to a process of Informed Consultation and Participation and will need to comply with the rights and protections for Indigenous Peoples contained in relevant national law, including those laws implementing host country obligations under international law. IFC Performance Standard (PS) 7, paragraphs 13-17, detail the special circumstances that require the Free, Prior and Informed Consent (FPIC) of affected Indigenous Peoples [2], which include any of the following: - Projects with impacts on lands and natural resources subject to traditional ownership or under the customary use of IP - Projects requiring the relocation of IP from lands and natural resources subject to traditional ownership or under customary use, - Projects with significant impacts on critical cultural heritage essential to the identity of IP, or - Projects using their cultural heritage for commercial purposes. Globally for Projects that meet these special circumstances, the EPFI will require a qualified independent consultant to evaluate the consultation process with IP, and the outcomes of that process, against the requirements of host country laws and IFC PS7. Where Stakeholder Engagement, including with IP, is the responsibility of the host government, EPFIs require the client to collaborate with the responsible government agency during the planning, implementation and monitoring of activities, to the extent permitted by the agency, to achieve outcomes that are consistent with PS7. If a process of good faith negotiations that meets the consultation requirements of PS7 has been followed and documented, but it is not clear if FPIC has been achieved, the EPFI will determine, with supporting advice from the consultant, if this qualifies as a justified deviation from the requirements of PS7, and whether the client should pursue additional corrective actions to meet these objectives.
EP6: Grievance Mechanism	For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish effective grievance mechanisms which are designed for use by Affected Communities and Workers, as appropriate, to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. Grievance mechanisms are required to be scaled to the risks and impacts of the Project, and will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. Grievance mechanisms should not impede access to judicial or administrative remedies. The client will inform Affected Communities and Workers about the grievance mechanisms in the course of the Stakeholder Engagement process.

[2] Indigenous Peoples and/or Traditional Local Communities of Sub-Saharan Africa Historically Underserved, according to the World Bank's new definition (World Bank, 2016)

3.5.1 THE WORLD BANK'S ENVIRONMENTAL GUIDELINES

The approach to consultation detailed in this SEP has been prepared in line with World Bank's (WB) Environmental, Health and Safety (EHS) Guidelines, including the International Finance Corporation Performance Standards and the World Bank's Environmental and Social Framework (ESF).

In general, the IFC Performance Standards are primarily designed for private sector investment projects, emphasizing the management of social and environmental performance throughout project implementation. However, when financing involves the public sector or government entities, it is recommended that the evaluation be supplemented with the World Bank's ESF to ensure comprehensive assessment.

3.5.1.1 INTERNATIONAL FINANCE CORPORATION PERFORMANCE STANDARDS

The IFC PS1 provides principles and requirements for the stakeholder engagement:

- Provide affected communities with opportunities to express their views on project risks, impacts and mitigation measures, and allow the client to consider and respond to them;
- Begin early in the process of identification of environmental and social risks and impacts, and continue on an ongoing basis as risks and impacts arise;
- Stakeholder engagement should be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to affected communities - Where the project has potentially significant adverse impacts on affected communities, an "informed consultation and participation" (ICP) process should take place. ICP is an organized and iterative consultation that involves a more in-depth exchange of views and information including "free, prior and informed consent";
- Stakeholder engagement should be inclusive of all the relevant groups within the community (including the vulnerable and marginalized), focused on those directly affected as opposed to those not directly affected, be free of external manipulation, interference, coercion, or intimidation; and
- Stakeholder engagement should be documented and include opinions and concerns as well as the measures taken to respond to them, i.e., the actions taken by the project to avoid or minimize risks to, and adverse impacts on, the affected communities.

Requirements

- Information disclosure is a key requirement of stakeholder engagement. Key messages and information that should be provided during engagement include:
    - The purpose, nature and scale of the Project;

- The duration of proposed Project activities;
- Any risks to and potential impacts on such communities and relevant mitigation measures;
- The envisage stakeholder engagement process; and
- A grievance mechanism by which community concerns are received, answered and addressed in a timely manner.
- Further to the requirements for stakeholder engagement outlined in PS1, the additional standards that contain requirements for stakeholder consultation and participation and have been considered in developing this SEP include PS2, 4, 5, 6,7 and 8.

3.5.1.2 The World Bank's Environmental and Social Framework

The Environmental and Social Framework outlines the Borrowers' obligations to identify and assess the environmental and social risks and impacts of projects supported by the World Bank through the Environmental and Social Standards (ESSs), as well as through the financing of investment projects. This assessment shall meet the following Environmental and Social Standards:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS 2: Labor and Working Conditions;
- ESS 3: Resource Efficiency and Pollution Prevention and Management;
- ESS 4: Community Health and Safety;
- ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ESS 8: Cultural Heritage;
- ESS 9: Financial Intermediaries; and
- ESS 10: Stakeholder Engagement and Information Disclosure

The ESS 1 and ESS 10 recognize the importance of open and transparent collaboration between the project and its stakeholders as a key element of good international practice. Effective stakeholder engagement can enhance the environmental and social sustainability of projects and contribute to the successful design and implementation of project activities.

Stakeholder involvement is an inclusive process carried out throughout the project lifecycle. Stakeholder consultation and participation are based on an inclusive, participatory approach, aimed at fostering effective and efficient stakeholder commitment to the assessment and management of the project's environmental and social risks and impacts. Public consultation is a vital part of the project's environmental and social assessment, as well as the project implementation process, including the monitoring and evaluation of activities.

Table 3-4 - Summary of the WB ESF requirements

ENVIRONMENTAL AND SOCIAL STANDARD	DESCRIPTION
ESS 1	ESS1 outlines the Borrower's responsibilities for assessing, managing, and monitoring the environmental and social risks and impacts at each stage of a project, aiming to achieve environmental and social outcomes that align with the ESS, in a manner and within a timeframe deemed satisfactory to the Bank. Within this framework, the Borrower is required to: (i) conduct an environmental and social assessment of the proposed project, including stakeholder engagement; (ii) establish dialogue with stakeholders and disseminate relevant information in accordance with ESS 10; (iii) develop an Environmental and Social Commitment Plan (ESCP) and implement all measures and actions outlined in the legal agreement, including the SEP; and (iv) monitor the environmental and social performance of the project and disseminate related information, in line with the ESS.
ESS 10	The requirements set out in ESS 10 are as follows: - Borrowers are required to engage with stakeholders throughout the project lifecycle, beginning consultation as early as possible in the project development process and within a timeframe that allows for meaningful consultation on project design; - The nature, scope, and frequency of stakeholder engagement should be proportionate to the project's nature, scale, and potential risks and impacts; - Borrowers must engage in meaningful consultation with all stakeholders, ensuring that stakeholders are provided with timely, relevant, understandable, and accessible information. Consultations must be conducted in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination, or intimidation. The stakeholder engagement process will involve the following steps, as outlined in more detail in ESS 10: - stakeholder identification and analysis; - planning how engagement with stakeholders will take place; - information dissemination; - stakeholder consultation; - complaints management mechanism; and - reporting to stakeholders. As part of the environmental and social assessment, the Borrower must maintain and disseminate a documented record of stakeholder engagement. This record should include a description of the stakeholders consulted, a summary of the comments received, and a brief explanation of how the comments were taken into account or, if not, the reasons why they were not considered.

ENVIRONMENTAL AND SOCIAL STANDARD	DESCRIPTION
	As set out in ESS No. 10, the Borrower will continue to engage with stakeholders throughout the life of the Project and provide them with information in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the Project. In accordance with ESS 1, in cases of substantial risk, the Borrower will, prior to project appraisal, provide the Bank with, and make publicly available (as agreed with the Bank), documentation on the environmental and social risks and impacts of the project. These documents will thoroughly examine the key risks and impacts of the project and include sufficiently detailed information to serve as the basis for stakeholder engagement and the Bank's decision-making process. The Borrower will ensure that these documents are made publicly available, as outlined in the ESCP.

3.5.1.3 Gap Analyses between IFC Performance Standards and World Bank's Environmental and Social Framework

The Table 3-5 outlines the key gaps and complementarities between the IFC Performance Standards and the World Bank's Environmental and Social Framework (ESF) with respect to the stakeholder engagement process, as previously described.

Table 3-5: Comparison of IFC PS´s and WB Environmental and Social Framework

	IFC	WB Environmental and Social Framework	
PS		**ESS**	
	General: Socio-Environmental Performance aimed at the private sector and investors		General: Social and Environmental Performance for the public sector and governments Strong emphasis on integrated assessment, human rights, local communities and community participation
PS1	+ Transparency and Governance requirements	ESS1	+ Transparency and Governance requirements
PS2/PS4	+ Detailed and rigorous requirements for dissemination and consultation	ESS4	+ Detailed and rigorous requirements for dissemination and consultation
PS5	+ Community Involvement and Human Rights Protection	ESS5	+ Community Involvement and Human Rights Protection
		ESS7	Demands that governments implement policies for indigenous peoples
		ESS9	Financial Intermediaries - Demands transparency in financing by intermediaries
		ESS10	It requires a formal complaints mechanism, more regular public consultations and greater transparency in the decision-making process.

4 PROJECT STAKEHOLDERS AND ANALYSIS

4.1 INTRODUCTION

This section presents the general framework for the identification, mapping, and analysis of stakeholders within the scope of the SEP for the Tosçelik Niğde Solar Power Plant Project.

The stakeholder identification process enables the recognition of the different groups that may influence or be influenced by the Project activities, as well as the assessment of the level of impact that these groups may have on the Project and the level of impact that the Project may have on them throughout its various phases.

This framework takes into account the administrative, social, and institutional context of Türkiye, as well as the specific characteristics of Niğde Province, where the Project is located.

4.2 PRELIMINARY STAKEHOLDER MAPPING AND IDENTIFICATION

To develop an effective SEP, it's essential to identify the stakeholders and understand their priorities and objectives concerning the proposed project. For the purposes of this plan “stakeholders” include individuals or groups that may influence or be impacted by the Project.

As per IFC (2007), *Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.*

A diverse range of stakeholders is likely to be identified for the SEP process. Different stakeholders will have varying concerns, so they will be grouped based on their connections to the proposed project. Understanding these connections is crucial for identifying the key objectives of engagement.

At this preliminary stage, the following stakeholder categories will be considered for the purpose of mapping and analysis as being of interest to the Project.

- Primary Stakeholders/Affected parties;
- Secondary Stakeholders/Other parties; and
- Vulnerable and Disadvantaged Groups.

4.2.1 PRIMARY STAKEHOLDERS/AFFECTED PARTIES

The affected parties are mainly individuals, groups and entities that are likely to be affected by the Project directly or indirectly, positively, or negatively within the Project Area of Influence (AoI). This category of stakeholders will include project affected People and potential impacted people:

Table 4-1 – Potential Primary Stakeholder

Stakeholder Group	Type of potential stakeholder
Project affected people	Owners or users (including informal users) of land located within the solar power plant footprint.
	Owners or users (including informal users) of land crossed by the high-voltage transmission lines.
	People who may experience temporary restrictions on access to agricultural land, rural tracks, or private properties during the construction phase.
	Owners of small local economic activities potentially affected by the Project (e.g. agriculture, livestock grazing, small informal businesses).
	Public and private entities responsible for existing infrastructure within the Project area or along the ETL routes, including electricity networks, water pipelines, rural roads, and other linear infrastructure.
Potentially impacted people and other community members	Residents of the settlements of Altay, Alpagut, Kemalpaşa, Badak, Bereket, and Seslikaya.
	People living or carrying out activities in proximity to the solar power plant area or the transmission line corridors.
	Users of access roads and rural tracks that may be temporarily affected by increased traffic, noise, or dust during construction.
	Local communities that may perceive indirect impacts associated with the Project (e.g. temporary landscape changes, movement of heavy vehicles, noise, or dust).

4.2.2 SECONDARY STAKEHOLDERS/OTHER INTERESTED PARTIES

Secondary stakeholders those who may not experience direct impacts from the project but consider or perceive their interests as being affected by it. Additionally, they may influence the project and its implementation process in some way. This category is applicable to the Project and includes the following individuals and/or groups and may include, but not limited to the following entities:

- National Government and Regulatory Bodies;
- District Government and Regulatory Bodies;
- Civil Society; and
- Media.

4.2.3 DISADVANTAGED OR VULNERABLE GROUPS

Disadvantaged or vulnerable individuals or groups are a segment of the population that has certain specific characteristics that put them at higher risk of being excluded from participating in the project or benefiting from the outcomes of the project. Potentially vulnerable groups would be those who face barriers to participation in public consultation and decision-making meetings.

Engagement activities included consultations with a wide range of stakeholders, including local communities, social organizations, and government representatives. These consultations aimed to ensure that all potential social impacts, including those affecting vulnerable groups, were thoroughly considered. These groups shall be tracked during the ESIA phase.

For the purposes of this SEP, and in alignment with the ESIA, Disadvantaged or Vulnerable Individuals or Groups (DVIGs) are defined as individuals or households within the Project's Area of Influence who, due to specific personal, social, cultural, legal or economic characteristics, may be disproportionately affected by Project activities or may face barriers to accessing information, participating meaningfully in consultation processes, or benefiting from mitigation and support measures.

Based on primary data collected during field surveys and mukhtar consultations undertaken in January 2026, supported by broader national and provincial contextual analysis, the following groups were identified as potentially vulnerable within the Project Area of Influence:

- elderly persons (65 years and above), particularly individuals living alone or with limited mobility;
- persons with disabilities or chronic illnesses;
- female-headed households;
- migrant and refugee households, including Afghan shepherd families (Seslikaya and Altay), Syrian agricultural households (Bereket and Kemalpaşa), and internal migrant households identified in Badak;
- non-Turkish-speaking individuals, including households whose primary languages include Dari, Pashto, Urdu or Arabic;
- households experiencing food insecurity or relying on social assistance (including Social Assistance and Solidarity Foundation (SYDV) beneficiaries); and
- illiterate adults.

These groups will receive targeted consideration throughout stakeholder engagement, disclosure, grievance management and monitoring activities to support inclusive and meaningful participation throughout the Project lifecycle.

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4.3 STAKEHOLDER IDENTIFICATION ANALYSIS

Stakeholder analysis enables engagement to be tailored appropriately to the needs and interests of different stakeholder groups to ensure their views and concerns are addressed in a suitable manner.

Stakeholders will be analyzed based on their interest in and impact on the Project to enhance understanding and management. It should be noted that the level of interest and impact of each stakeholder group depends on various factors, including their level of authority, socio-economic context, influence, education, and cultural background.

It's important to remember that each stakeholder has its own needs, expectations, and concerns, which may influence and interest. The criteria to be used for their classification and subsequent prioritization of the stakeholders are presented below:

- Interest on the Project - defined as the willingness of the stakeholder to be informed and actively participate in the engagement process for the Project. The following table outlines the criteria used to assess stakeholder interest

  Table 4-3– Levels of Stakeholder interest); and

- Influence on the Project - Influence is defined as the ability of the stakeholder to affect or influence decision-making processes and outcomes related to the Project. The following table outlines the criteria used to assess stakeholder influence (Table 4-2).

Table 4-2– Levels of Stakeholder influence

Degree of Influence	Description
Low	Stakeholders possess little capacity to influence Project development and/or few relationship networks with local stakeholders.
Medium	Stakeholders possess a medium level of capacity for orchestration and influence, exercise influence on social networks with important connections to local stakeholders such as inhabitants, workers, tourists, politicians, among others.
High	Project development, as well as significant relationship networks with local stakeholders such as inhabitants, workers, tourists, politicians, among others.

Table 4-3– Levels of Stakeholder interest

Degree of Interest	Description
Low	Stakeholders with little or no interest in project´s outcomes

Degree of Interest	Description
Medium	Stakeholders they may not be directly invested in the project's outcomes. Therefore, it's still crucial to maintain their satisfaction without inundating them with excessive communication.
High	Stakeholder with high expectation and strong interest in the project outcomes

The table above presents the identification and classification of the Project's key stakeholders, organized into primary stakeholders (directly affected parties), secondary stakeholders (indirectly affected or other interested parties), and potentially vulnerable groups. For each category, the nature of the impact, as well as the level of interest and influence, is indicated. This structured approach supports the definition of an appropriate stakeholder engagement and communication strategy throughout the Project lifecycle.

Stakeholder Prioritisation Methodology

Stakeholders are prioritised based on their level of Project impact, interest, influence, vulnerability, proximity to the SPP and ETL components, land-based exposure and need for targeted communication. Primary stakeholders and vulnerable groups will receive more frequent and tailored engagement activities throughout the Project lifecycle.

Stakeholders have been prioritised based on a combination of the following criteria:

Degree of Project Impact: whether stakeholders are directly affected by land acquisition, livelihood impacts, temporary disturbance, traffic, noise, dust, or other environmental and social impacts. Stakeholders directly affected by the Project are assigned higher priority.

Level of Interest: the extent to which stakeholders are interested in Project activities and outcomes and their willingness to participate in the engagement process.

Level of Influence: the ability of stakeholders to influence Project decisions, public perception, permitting processes, or Project implementation.

Vulnerability: whether stakeholders belong to disadvantaged or vulnerable groups that may experience disproportionate impacts or face barriers in accessing Project information and consultation processes. Such stakeholders are prioritised for targeted engagement measures.

Proximity to Project Components: the physical distance of stakeholders from the SPP site and ETL corridor. Communities located within the Direct Area of Influence (ADI) receive a higher level of engagement than those located within the Indirect Area of Influence (AII).

Land-based Exposure and Dependency: the extent to which stakeholders depend on land, agriculture, grazing activities or natural resources that may be affected by the Project.

Need for Targeted Communication the presence of characteristics that may require tailored engagement approaches, including gender, age, literacy limitations, language barriers, disability or restricted mobility.

Based on the above criteria, stakeholders are categorised into three engagement priority levels:

High Priority: directly affected stakeholders and vulnerable groups with high levels of impact and/or high information needs. These stakeholders receive frequent and tailored engagement throughout the Project lifecycle.

Medium Priority: stakeholders with moderate influence, moderate exposure or specific regulatory and institutional responsibilities. Engagement is undertaken regularly and according to Project milestones.

Low Priority: stakeholders with limited direct exposure or influence. These stakeholders are informed through periodic disclosure and engagement activities as appropriate.

Table 4-4– Stakeholder Groups Analysis and Connections to the Project

Stakeholder Category	Stakeholder Group	PROJECT STAKEHOLDERS	Nature Of Affectation	Relevance/Importance of Stakeholder	Proximity to project	Vulnerability	Engagement Priiority	Engagement appraoch	Level Of Interest	Level Of Influence
Primary Stakeholders/Affected Parties	Local residents; Local representatives;	Alpagut settlement	Direct Affected	• Potentially impacted due to disruptions in their economic activities • Potential opportunities (employment, community development) • Potential affected informal commercial infrastructure • Potential perceivable impacts of the Project (dust, noise and waste generation) • Represents interests of affected communities and vulnerable groups • Support the Identification of vulnerable people and groups • Land business restrictions and utilities damage that will cause potential economic displacement	AoI (Primary)	Medium	High	Frequent and targeted engagement throughout Project lifecycle	High	High
		Altay settlement	Direct Affected		AoI (Primary)	Medium	High	Frequent and targeted engagement throughout Project lifecycle	High	High
		Badak settlement	Direct Affected		AoI (Primary)	Medium	High	Frequent and targeted engagement throughout Project lifecycle	High	High
		Bereket settlement	Direct Affected		AoI (Primary)	Medium	High	Frequent and targeted engagement throughout Project lifecycle	High	High
		Kemalpaşa settlement	Direct Affected		AoI (Primary)	Medium	High	Frequent and targeted engagement throughout Project lifecycle	High	High
		Seslikaya settlement	Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High
	Land owners	Located in the settlements within the AoI	Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High
	Farmers		Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High

Stakeholder Category	Stakeholder Group	PROJECT STAKEHOLDERS	Nature Of Affectation	Relevance/Importance of Stakeholder	Proximity to project	Vulnerability	Engagement Priiority	Engagement appraoch	Level Of Interest	Level Of Influence
	Formal land users		Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High
	Informal land users		Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High
	Livestock breeders		Direct Affected		AoI (Primary)	High	High	Frequent and targeted engagement throughout Project lifecycle	High	High
Secondary Stakeholders/Other Interested Parties	Governmental institutions; Private energy companies; Local media; Cooperatives; Unions.	Niğde Municipality Directorate of Climate Change and Zero Waste	Indirect Affected	• Responsible for establishing policy, granting permits or other approvals for the Project, and monitoring and enforcing compliance with national Law throughout all stages of the Project life cycle. • Approvals for and assistance in Project activities within each of the authorities' remit (land issues, water use, energy, investment support, etc.) • Potential assistance in interaction with other authorities and local population/organizations • District governments are responsible for the implementation of legislation, and development plans and policies at the provincial level. This includes issuing authorization for land concession and physical/ economic resettlement. • Also responsible for monitor the implementation of the C-ESMP, SEP and GRM • Local NGOs, and other Community based- organizations may have different interests depending on their area of activity. • In general, they will consult about rights of PAPs and the environment during the project implementation.	Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Low	Low
		Niğde Provincial Directorate of Environment and Urbanization	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Low	Low
		Ulukışla Municipality	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Low	Low
		Bor Municipality	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Low	Low
		Meram Electric Distribution Inc. – Niğde 1 Operations	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Medium	Medium
		Niğde Provincial Directorate of Agriculture and Forestry	Indirect Affected		Settlements near of AoI as district	Low	Medium	Regulatory coordination	Medium	Medium

Stakeholder Category	Stakeholder Group	PROJECT STAKEHOLDERS	Nature Of Affectation	Relevance/Importance of Stakeholder	Proximity to project	Vulnerability	Engagement Priiority	Engagement appraoch	Level Of Interest	Level Of Influence
					centre Provincial area			and periodic meetings		
		Ulukışla Chamber of Agriculture	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Medium	Medium
		Bor District Directorate of Agriculture and Forestry	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Medium	Medium
		Bor Chamber of Agriculture	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Medium	Medium
		Niğde Breeding Cattle Breeders' Association (Bor Branch)	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Medium	Medium
		Ulukışla No. 42 Motor Vehicles Cooperative	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Regulatory coordination and periodic meetings	Low	Low
		51 Haber Newspaper	Indirect Affected		Settlements near of AoI as district centre, Provincial area	Low	Medium	Public disclosure and information sharing	Low	Low
		Kalyon Solar Power Plant	Indirect Affected		AoI (Primary)	Low	High	Regulatory coordination and periodic meetings	Medium	Medium
		EcoGreen – G4 BOR-2 Günel Solar Power Plant	Indirect Affected		AoI (Primary)	Low	High	Regulatory coordination and periodic meetings	Medium	Medium
		Badak Village Mosque	Indirect Affected		AoI (Primary)	Low	High	Regulatory coordination and periodic meetings	Medium	Medium

Stakeholder Category	Stakeholder Group	PROJECT STAKEHOLDERS	Nature Of Affectation	Relevance/Importance of Stakeholder	Proximity to project	Vulnerability	Engagement Priiority	Engagement appraoch	Level Of Interest	Level Of Influence
Vulnerable Groups (potential)	(i) elderly persons aged 65 and above; (ii) persons with disabilities and chronic illness; (iii) female-headed households; (iv) migrant and refugee households, including Afghan shepherd families in Seslikaya and Altay, Syrian agricultural households in Bereket and Kemalpaşa, and internal migrants in Badak; (v) non-Turkish speaking individuals; (vi) households with food insecurity or relying on SYDV social assistance; and (vii) illiterate adults.	Toro Ulukışla Women's Cooperative	Direct Affected	• Disproportionate E&S impacts on vulnerable groups; capacity to access Project benefits. • They may also have difficulty in engaging with the stakeholder consultation process and thus may not be able fully express their concerns regarding the proposed Project. • Potential opportunities (employment, community development).	Settlements near of AoI as district centre, Provincial area	High	High	Tailored engagement measures	High	High
		Bor Women's Cooperative	Direct Affected		Settlements near of AoI as district centre, Provincial area	High	High	Tailored engagement measures	High	High
		Niğde Kömürcü Village Alevi-Bektashi Association	Direct Affected		Settlements near of AoI as district centre, Provincial area	High	High	Tailored engagement measures	High	High

5 STAKEHOLDER ENGAGEMENT PROGRAM

5.1 INTRODUCTION

This chapter presents the Stakeholder Engagement Program for the Project, outlining the consultation activities undertaken and planned throughout the different phases of the ESIA process and the overall Project lifecycle. It describes the engagement strategy, communication channels, mechanisms for incorporating the views of vulnerable groups, and the roles and responsibilities related to SEP implementation. The objective is to ensure a structured, inclusive, transparent, and continuous stakeholder engagement process, aligned with national legal requirements and international good practice.

5.2 STAKEHOLDER ENGAGEMENT DURING THE ESIA PROCESS

Environmental and Social (E&S) assessment process engagement activities provide an opportunity for affected and interested stakeholders to express views and concerns about the proposed Project. It also enables the E&S assessment team to consider and respond to stakeholder comments and incorporate these into the identification of impacts and development of appropriate and relevant mitigation.

Engagement activities occurred at three distinct stages:

- Scoping phase, includes gathering input from stakeholders to support and guide the engagement activities and the subsequent steps of the assessment process, as well as the development of the Terms of Reference (ToR) for the ESIA phase.
- Impact Assessment works which includes local interaction during the site baseline activities;
- ESIA Report disclosure.

During the scoping phase, stakeholder engagement consisted of the public consultation, carried out in accordance with the applicable national legal requirements. The purpose of this consultation was to present the Project, inform stakeholders about the E&S Impact Assessment process, and collect comments, concerns, and inputs from interested and affected parties. In parallel, a visual site verification was conducted to support the preliminary identification of potential environmental and social issues and to gain a general understanding of the territorial context and surrounding areas.

At this stage, the comments and observations gathered through the public consultation were considered in defining the scope of the ESIA, contributing to the identification of key issues to be assessed and to the structuring of subsequent studies.

The second phase of engagement took place during the baseline data collection activities at the Project site as part of the ESIA development. This phase will included local interactions with relevant stakeholders, aiming to deepen the understanding of existing environmental and social conditions and to integrate local perspectives and

concerns into the assessment process. These activities also supported the update and refinement of stakeholder mapping, including local communities, government authorities, civil society organizations, local economic activities, and other groups with an interest in the Project, while providing clear and accessible information on the ESIA process and fostering open and transparent dialogue (Table 5-1).

Table 5-1 - Stakeholder consulted ESIA Phase (January, 2026)

Sector	Stakeholders Consulted
Environment	Niğde Municipality Directorate of Climate Change and Zero Waste
	Niğde Provincial Directorate of Environment and Urbanization
	Ulukışla Municipality
	Bor Municipality
Energy	Meram Electric Distribution Inc. – Niğde 1 Operations
Agriculture	Niğde Provincial Directorate of Agriculture and Forestry
	Ulukışla Chamber of Agriculture
	Bor District Directorate of Agriculture and Forestry
	Bor Chamber of Agriculture
	Niğde Breeding Cattle Breeders' Association (Bor Branch)
	Farmer/Livestock Breeder Focus Group Discussion
Transportation	Ulukışla No. 42 Motor Vehicles Cooperative
Gender	Toro Ulukışla Women's Cooperative
	Bor Women's Cooperative
	Female Focus Group Discussion
Culturally sensitive groups	Niğde Kömürcü Village Alevi-Bektashi Association
	Migrant Focus Group Discussion
Local media	51 Haber Newspaper
Nearby SPP areas	Kalyon Solar Power Plant
	Smart Verde Solar Power Plant
	EcoGreen – G4 BOR-2 Günel Solar Power Plant
General (district and Municipal level)	Badak Village Mosque

Additional stakeholder consultation records, including PAP meeting records and interviews with affected parcel owners and land users (including informal users), will be documented and maintained as evidence of the stakeholder engagement process. Relevant consultation records and supporting documentation are also included as appendices to the Project-specific Livelihood Restoration Plan (LRP).

The Project will disclose ETL-related land acquisition requirements to affected communities and individual PAPs following completion of corridor-wide verification. Disclosure will include parcel-specific information on permanent land acquisition,

easement restrictions, anticipated livelihood impacts, and subsequent steps in the process.

The Project will consult individual PAPs on proposed entitlements and mitigation measures following finalization of the Livelihood Restoration Plan (LRP).

Disclosure will be carried out through accessible channels, including communication through mukhtars, provision of hard copies in affected settlements, and online disclosure where feasible including Project website. The evidence documents will be kept by Tosçelik.

The third phase of engagement (ESIA Report Disclosure) will involve public disclosure of the ESIA Report and the organization of public consultation meetings, with the number and locations to be determined by the competent environmental authority in accordance with the applicable legal framework in Türkiye. During this phase, local authorities will play an important role in facilitating information dissemination and supporting the collection and transmission of public comments to the environmental authority.

In addition, and in line with international good practice, targeted engagement activities will be undertaken with Affected Communities and, where relevant, with specific livelihood groups and vulnerable stakeholders. The outcomes of these consultations will constitute an important input into the ESIA review and decision-making process.

Engagement will be based on the following key principles of good practice:

- Timeliness, to ensure that key issues are considered and that stakeholders can provide input into Project decisions;
- Dissemination of information in readily understandable formats and using culturally appropriate techniques, in advance of engagement events and meetings;
- Gender inclusivity, with the aim, where feasible, of achieving approximately 50% participation of women and 50% participation of men at engagement events;
- Freedom from manipulation and coercion; and
- Systematic documentation of stakeholder engagement activities, including records of stakeholders consulted, issues raised, agreed follow-up actions and unresolved concerns; and
- Transparent feedback mechanisms to demonstrate how stakeholder input has informed Project design, mitigation measures and management plans.

5.3 PROPOSED DISSEMINATION STRATEGY

The Table 5-2 presents the proposed stakeholder engagement approach developed in alignment with applicable national legislation, IFC Performance Standards and other relevant international good practice requirements.

The SEP and Project grievance mechanism, including relevant contact details and submission channels, will be disclosed in Turkish and English as part of the ESIA disclosure package.

Table 5-2 – Proposed dissemination strategy during the ESIA process

Stage	Objective	Key Activities	Key Outputs
Inception Engagement (Project presentation)	• To establish an initial understanding of the Project scope, applicable stakeholder engagement requirements, and relevant stakeholder groups	• Internal inception meetings between the Project team and ESIA consultants to align on stakeholder engagement approach; • Preliminary review of legal and institutional requirements applicable to stakeholder engagement in Türkiye	Initial engagement framework; Preliminary identification of stakeholder categories
Scoping Disclosure	• To inform stakeholders about the proposed Project and the ESIA process; • To disclose the Project to interested and affected parties; • To collect initial comments, concerns, and inputs to support definition of the ESIA scope	• Public consultation conducted in accordance with national legal requirements; • Presentation of the Project and ESIA process; • Collection of stakeholder comments and questions; • Visual site verification to support preliminary identification of environmental and social issues	Record of public consultation (minutes and/or attendance records); Summary of stakeholder comments and responses; Inputs to the definition of the ESIA scope

Stage	Objective	Key Activities	Key Outputs
Impact Assessment Activities (site baseline)	• To ensure that the environmental and social conditions are thoroughly understood and that local perspectives and concerns are integrated into the assessment process	• Field visit to perform site investigation and impact assessment.	Updated stakeholder database; Inputs and contribution to impact assessment and mitigation measures
ESIA Disclosure	• To discuss the identified impacts and proposed mitigation measures with stakeholders allowing for their input; and • To provide stakeholders with the opportunity to comment on the Draft ESIA report.	• Submission of the draft ESIA Report to relevant environmental authorities and dissemination to other key authorities and stakeholders. The Consortium will be responsible for public dissemination of the report. • In accordance with best practice, QDE will make the Draft ESIA Report available in public places for comment. • Availability of the draft ESIA Report will be advertised through newspaper announcements (and also newspaper announcements) in Türkiye and made available for public review. • Besides, EIA decisions including ETL will be submitted. • Dissemination of engagement materials (Non Technical Summary (NTS), posters etc.). • Prior to financial signing, the ESIA, relevant human rights and climate change risk information, Human Rights Impact Assessment (HRIA) (itself or summary format) EPRP and SEP including grievance mechanism will be disclosed online in Turkish and English. The ESIA Non-Technical Summary (NTS), SEP summary and grievance mechanism information will also be disclosed in accordance with IFC PS1 paragraph 29 and EP4 requirements.	Draft ESIA Report; Non-technical summary of identified impacts and mitigation measures; Notification material; Minutes of Meeting and/or issues and response report; and Updated SEP.

Stage	Objective	Key Activities	Key Outputs
		• Hard copies of the this documents will be made available in Turkish in affected settlements through mukhtars/local authorities. The ESIA Non-Technical Summary (NTS), SEP summary and grievance mechanism information will be made available at publicly accessible locations and community representatives to facilitate access by affected communities. • During the disclosure period, stakeholders will be able to submit comments through the Project website, e-mail, phone, QR code, grievance forms, grievance boxes, CLO contact and face-to-face communication. Comments received will be recorded and responded to through the stakeholder engagement database. Stakeholders will be provided with a reasonable period to review disclosed documents and submit comments. • All comments received during the disclosure period will be documented and addressed through an Issues and Response Report, which will record how stakeholder feedback has been considered and incorporated into Project documents, where appropriate. • Consultation on the draft ESIA Report. This will include: ○ Identification of impacts in the draft ESIA and proposed mitigation ○ Identification of stakeholder concerns and opinions on the impacts identified; ○ Involvement of stakeholders in assessing the efficacy and appropriateness of the proposed mitigation measures; and ○ Identification of revisions or additions to the draft ESIA report where necessary. ○ Updated ESIA package documents and stakeholder engagement materials will be re-disclosed if material changes in Project impacts,	

Stage	Objective	Key Activities	Key Outputs
		mitigation measures or stakeholder concerns arise during Project implementation.	
Livelihood Plan (LRP) Disclosure and Consultation	• To disclose the Project-specific Livelihood Restoration Plan (LRP), where applicable, to affected stakeholders; and • To ensure the participation of affected stakeholders in the development and implementation of livelihood restoration measures.	• Disclosure of the Project-specific LRP to affected land owners, formal land users, informal land users, farmers and livestock breeders, as applicable; • Provision of information regarding eligibility criteria, livelihood restoration measures, compensation principles and grievance mechanism procedures; • Consultation meetings and individual discussions with affected stakeholders and community representatives; • Collection and documentation of stakeholder comments and concerns related to livelihood restoration measures; • Disclosure of updated LRP documents, where material changes occur; • Provision of opportunities for stakeholders to submit comments through the Project website, e-mail, phone, grievance forms, grievance boxes, CLO contact and face-to-face communication; and • Documentation of comments and responses through the stakeholder engagement database	Project-specific Livelihood Restoration Plan (LRP), where applicable; Meeting minutes and attendance sheets; Stakeholder comments Updated LRP documents; Updated stakeholder database.

5.4 PROPOSED STRATEGY FOR CONSULTATIONS

The Project will use a diverse range of channels to communicate with stakeholders. The stakeholder engagement strategy is presented in the following table.

Table 5-3 – Proposed strategy for consultation

Stakeholder Category	Stakeholder Group	Optional Means of Notification/ Consultation	Calendar / Frequency	Proposed Venue / Location	Responsible	Key Information to be Disclosed
Primary Stakeholders/Affected Parties	Project Affected People	• Project dissemination meetings • Press releases in the local media. • Information leaflets and brochures • General Focus Group Discussion (FGD), (separate focus group meetings with vulnerable groups, as appropriate) • Grievance Redress Mechanism (GRM)	Monthly throughout Project lifecycle	• Village Mukhtar Offices • Village Public Halls • On-site Project Office	Contractor Sub contractor Tosçelik	Project scope, construction schedule, impacts, mitigation measures, GRM access, employment opportunities
	PAPs affected by ETL land acquisition and easement restrictions	• Parcel-specific consultations, entitlement disclosure meetings, livelihood restoration consultations, GRM	Throughout land acquisition and LRP implementation	Settlement within the AoI	Tosçelik / CLO / Social Team	Parcel-specific impacts, compensation principles, easement restrictions, livelihood restoration measures, cut-off dates

Stakeholder Category	Stakeholder Group	Optional Means of Notification/ Consultation	Calendar / Frequency	Proposed Venue / Location	Responsible	Key Information to be Disclosed
	Potentially impacted people and other community members	• Project dissemination meetings • Press releases in the local media • Information boards • Brochures • FGDs • GRM awareness sessions	Throughout the lifespan of the project	Project area	Tosçelik / EPC Contractor	Project scope, construction schedule, impacts, mitigation measures, GRM access, employment opportunities
	Contractors, subcontractors and primary suppliers	• E&S induction training, Supplier CoC communication, worker grievance awareness, toolbox talks	Prior to mobilisation and periodically during construction	Project site and contractor facilities	Tosçelik / EPC Contractor	Code of Conduct, SEA/SH prevention, labour rights, OHS obligations, grievance mechanism, supply chain expectations
Secondary Stakeholders/Other Interested Parties	National Government (Regulatory and Executive Institution)	• Project dissemination meetings • Workshops • Formal correspondence by phone/ email/ written letters • email communication	Quarterly and as required	Government offices / online meetings	Tosçelik Management / Social Team	Project permits, compliance updates, monitoring results, land acquisition process updates
	Provincial Regulatory Bodies	• Project dissemination meetings • Workshops • Correspondence by phone/ email/ written letters	Quarterly	Municipalities and governorate offices	Tosçelik / CLO	Project updates, traffic impacts, local employment opportunities, emergency preparedness

Stakeholder Category	Stakeholder Group	Optional Means of Notification/ Consultation	Calendar / Frequency	Proposed Venue / Location	Responsible	Key Information to be Disclosed
	District and Municipal Administration	• Project dissemination meetings • Consultation meetings. • GRM • Awareness sessions/ training for Gender/ Gender-Based Violence (GBV) and Sexual Harassment (SH), GRM and complaint' channels/ confidentiality and anonymity complaints	Quarterly	Municipalities and governorate offices	Tosçelik / CLO	project updates, traffic impacts, local employment opportunities, emergency preps
	Civil Society Partners and Potential Partners Media	• Project dissemination meetings • Dissemination of hard copies (in relevant languages) at designated public locations. • Consultation meetings. • Information leaflets and brochures • GRM	At Project commencement and annually thereafter	Public venues within affected settlements	Tosçelik / Social Team	Environmental and social impacts, vulnerable group inclusion measures, monitoring outcomes
Vulnerable Groups (Potential)	Households with food insecurity or relying on SYDV social assistance; and (vii) illiterate adults	• Local media, • Community structures and local administration • Schools, Mosques, and health centres • Awareness sessions/ training for Gender/ GBV and SH, GRM and complaint' channels/ confidentiality and anonymity complaints • Verbal • Community announcement • FGD meetings in close-by location within communities	Throughout the lifespan of the project	Within affected communities	CLO / Social Team	Livelihood risks, employment opportunities, GRM access, SEA/SH confidential reporting channels

Stakeholder Category	Stakeholder Group	Optional Means of Notification/ Consultation	Calendar / Frequency	Proposed Venue / Location	Responsible	Key Information to be Disclosed
	Female-headed households	• Focused consultations, verbal briefings, women-only FGDs where appropriate	Throughout Project lifecycle	Within affected communities	CLO / Social Team	Livelihood risks, employment opportunities, GRM access, SEA/SH confidential reporting channels
	Elderly persons aged 65 and above	• Community meetings, verbal announcements, home visits where required	Throughout Project lifecycle	Affected settlements	CLO / Social Team	Project schedule, access restrictions, health and safety measures, grievance channels
	Illiterate people	• Verbal communication, visual materials, simplified graphics, FGDs	Throughout the lifespan of the project	Affected settlements	CLO / Social Team	Project impacts, mitigation measures, GRM access procedures
	Non-Turkish speaking individuals	• Translated materials where feasible, verbal briefings, language support, simplified communication	Throughout Project lifecycle	Affected settlements and work areas	CLO / Social Team	Project information, worker/community rights, grievance mechanism access, land acquisition process
	Persons with disabilities and chronic illness	• Community announcement, focused group meetings, • • Focused meetings, accessible communication support, Braille ,	Throughout the lifespan of the project	Accessible community venues	CLO / Social Team	Accessible grievance channels, Project impacts, health

Stakeholder Category	Stakeholder Group	Optional Means of Notification/ Consultation	Calendar / Frequency	Proposed Venue / Location	Responsible	Key Information to be Disclosed
		audio/sign language support where feasible				and safety considerations
	Migrant and refugee households, including Afghan shepherd families in Seslikaya and Altay, Syrian agricultural households in Bereket and Kemalpaşa, and internal migrants in Badak	• Requires specific needs (clear messages, simple language, easy-to-understand graphics and illustrations, subtitles) • Migrant/refugee households and non-Turkish speakers will be provided with targeted verbal briefings, simplified materials and, where required, language support to ensure equal access to Project information and the grievance mechanism.	Throughout the lifespan of the project	Accessible community venues	CLO / Social Team	Accessible grievance channels, Project impacts, health and safety considerations

Emergency Related Stakeholder Engagement

Communities and external stakeholders potentially affected by emergency scenarios will be informed of relevant emergency risks, notification channels, required actions and contact points in coordination with the Emergency Preparedness and Response Plan (EPRP). Emergency-related information will be disclosed through mukhtars, local authorities, community meetings and notice boards where relevant.

Primary stakeholders of the Project (Project Affected People and PAPs affected by ETL land acquisition and easement restrictions), and vulnerable groups who will be informed about Emergency-related information, and EPRP documents.

Engagement on Biodiversity Matters

In addition to consultations with regulatory authorities and affected communities, the Project will undertake targeted engagement with biodiversity-related stakeholders, including relevant public institutions, universities, non-governmental organizations, and other conservation organizations, where appropriate. This engagement will be carried out prior to site preparation and vegetation clearance activities and will focus on the Project's interactions with Key Biodiversity Areas (KBAs), its potential impacts on biodiversity values, and the proposed mitigation and conservation measures.

The views, recommendations and outcomes arising from this stakeholder engagement process will be taken into consideration during the implementation and periodic review and update of the Biodiversity Management Plan (BMP) and Biodiversity Action Plan (BAP).

5.5 PROPOSED STRATEGY FOR INCORPORATING THE VIEWS OF VULNERABLE GROUPS

For the implementation of the Project activities, specific mechanisms will be put in place to ensure the integration of the views of potentially vulnerable groups, as identified through the ESIA process, based on the socio-economic characterization of the Project's area of influence.

In the context of the Tosçelik Niğde Solar Power Plant Project, potentially vulnerable groups may include, among others, low-income households, small-scale farmers, elderly persons, female headed households, individuals with low levels of education, migrants, and other persons who may face difficulties in accessing information or participating effectively in public consultation processes. Migrant/refugee households and non-Turkish speakers will be provided with targeted verbal briefings, simplified materials and, where required, language support to ensure equal access to Project information and the grievance mechanism.

Where appropriate, targeted engagement activities, such as small-scale meetings or focus group discussions, will be carried out during the different phases of the consultation process to ensure that the concerns, expectations, and suggestions of these groups are adequately considered.

The Project will implement an accessible, transparent, and context-appropriate Grievance Redress Mechanism, in line with applicable national legal requirements and international good practice. This mechanism will be appropriately disclosed to local communities and will be accessible to all individuals, including vulnerable groups. The operation and monitoring of the GRM will be ensured by the Project's Environmental and Social Team.

5.6 General Roles and Responsibilities in the Implementation of SEP

This section describes the preliminary organisational structure and the associated management functions related to the implementation of the SEP for the Tosçelik Niğde Solar Power Plant Project.

The overall management, coordination, and implementation of the SEP, as well as its associated tasks, will be the responsibility of the Project Proponent (Tosçelik), with the support of its E&S consultants and the contractors involved in the Project's execution.

The successful implementation of the SEP requires the appointment of personnel with clearly defined responsibilities for its execution and management. While the detailed Project specifications are still under development and the organisational structure may be adjusted as necessary, it is essential that, at a minimum, the roles outlined below are incorporated into the organisational structure to ensure the effective implementation of the SEP.

Table 5-4 – Key Roles and Responsibilities

Roles	Responsibilities
E&S Team	• Coordinate the on-the-ground implementation of the SEP and report to the PIU; • Coordinate stakeholder engagement activities, including interactions with government authorities, definition of information disclosure levels, and preparation of consultation materials; • Ensure that the stakeholder engagement database remains up to date; • Monitor and report on SEP implementation, including updates to stakeholder identification, analysis, and mapping, as required
Social Expert	• Implement the SEP in close coordination with the E&S Team; • Ensure awareness of the Project Grievance Redress Mechanism (GRM) among the workforce and affected communities by integrating this topic into planned Project meetings; • Coordinate with internal stakeholders (PIU, contractors, subcontractors, service providers, etc.) to ensure effective implementation of the Project's environmental and social commitments, including community awareness programmes and the communication strategy

Roles	Responsibilities
Community Liaison Officer (CLO)	• Implement site-level engagement activities in accordance with the guidance of the Social Specialist; • Support community mapping and the preparation of summaries of engagement outcomes (e.g. meeting minutes and consultation records)
Contractors / Subcontractors	• Comply with the requirements and standards set out in the SEP; • Cooperate in the implementation of stakeholder engagement activities, as applicable to their scope of work; • Perform the contracted works in accordance with contractual obligations and the Project's environmental and social commitments

6 STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 INTRODUCTION

This chapter presents a summary of the stakeholder engagement activities undertaken as part of the ESIA process, as well as the main findings derived from these interactions. It outlines the qualitative and quantitative methodologies applied, the stakeholder groups consulted, the key issues raised, and the recommendations provided. The purpose of this chapter is to consolidate the evidence gathered through the engagement process and demonstrate how stakeholder input has informed the impact assessment and the development of appropriate mitigation and management measures.

6.2 SUMMARY STAKEHOLDER ENGAGEMENT ACTIVITIES

Throughout the stakeholder engagement process, the project conducted a range of activities aimed at fostering transparent communication, building trust, and incorporating stakeholder input into project planning and decision-making. These activities were carried out on a continuous basis and across the different phases of the process, and included:

- Consultation Workshop: Held with community members, local authorities, and interest groups to gather feedback on project proposals and potential impacts.
- One-on-One Meetings: Conducted with key stakeholders, including government officials, business leaders, and community representatives, to address specific interests and issues.
- Public Information Sessions: Provided open forums for information sharing and dialogue, increasing awareness and encouraging broad participation.
- Ongoing Communication: Maintained through newsletters, emails, and a project website, offering updates and opportunities for continued input.

Prior to the fieldwork, households, mukhtars, and institutional stakeholders within the project's area of influence were identified. Efforts were undertaken to establish initial contact and schedule appointments via telephone both before and during the field activities. This phase focused on stakeholder mapping, coordination with local authorities, and confirmation of the fieldwork schedule in line with local availability and conditions.

Between 26–27 January 2026, ESIA-level engagement activities were conducted across settlements in Bor and Ulukışla Districts, including Badak, Seslikaya, Bereke, Altay, and the Kemalpaşa and Alpağut neighbourhoods. Meetings with mukhtars, household interviews, and focus group discussions were carried out.

Key themes emerging from these consultations included drought conditions, limited water availability, reliance on boreholes, and livestock husbandry as a primary livelihood source. Seasonal mobility and transhumance (yaylacılık) practices were identified as significant characteristics influencing settlement patterns and economic activity. In certain locations, low

resident populations, mourning periods, and high proportions of residents living in district centres constrained household access and required adaptive engagement approaches.

From 28–29 January 2026, engagement activities were expanded to include institutional stakeholders at provincial and district levels. Consultations were conducted with municipalities, provincial and district directorates, professional chambers, cooperatives, unions, and civil society organizations. These meetings provided complementary insights into the region's socio-economic structure, agricultural and livestock practices, environmental conditions, and local development dynamics.

Additional consultations were undertaken with solar power plant (SPP) operators located near Badak, Seslikaya, and surrounding settlements to better understand existing project-related experiences and perceived impacts. Due to limited household availability in certain villages, alternative measures such as telephone interviews based on mukhtar referrals and increased interviews in nearby neighbourhoods were implemented.

Overall, stakeholder engagement activities were conducted in accordance with the planned methodology, while maintaining flexibility to accommodate local constraints, including low rural population density, seasonal mobility, and social sensitivities. Despite these challenges, the engagement process is considered to have generated data adequately reflecting local social, economic, and cultural conditions relevant to the ESIA.

Table 6-1 - Summary stakeholder engagement during de ESIA phase

					Qualitative Survey Tools							
		Affiliated unit		Date	In-depth interview	Participant(s)		FGD (DVIG or PAP)	Participant(s)		Institutional interview	Participant(s)	
	Location	Province	District			Female	Male		Female	Male		Female	Male
1	Badak Village	Niğde	Bor	26.01.2026	Kalyon Solar Power Plant – Security Officer		1						
2	Badak Village	Niğde	Bor	26.01.2026	Badak Village Mosque – Imam		1						
3	Seslikaya Village	Niğde	Bor	26.01.2026	Kalyon Solar Power Plant – Security Officer		1						
4	Badak Village	Niğde	Bor	26.01.2026				Farmer/Livestock Breeder Focus Group Discussion	2	3			
5	Bereket Village	Niğde	Bor	26.01.2026				Female Focus Group Discussion	4				
6	Alpağut Neighborhood	Niğde	Ulukışla	27.01.2026							Ulukışla No. 42 Motor Vehicles Cooperative		1
7	Seslikaya Village	Niğde	Bor	27.01.2026				Migrant Focus Group Discussion	2	3			
8	Kemalpaşa Neighborhood	Niğde	Ulukışla	28.01.2026				Female Focus Group Discussion	6				
9	Alpağut Neighborhood	Niğde	Ulukışla	28.01.2026							Toro Ulukışla Women's Cooperative	1	
10	Niğde	Niğde	Central	28.01.2026							Niğde Municipality Directorate of Climate Change and Zero Waste		1
11	Niğde	Niğde	Central	28.01.2026							Niğde Provincial Directorate of Agriculture and Forestry – Environmental Engineer		1
12	Niğde	Niğde	Central	28.01.2026							Niğde Provincial Directorate of Environment and Urbanization		1
13	Niğde	Niğde	Central	28.01.2026							Meram Electric Distribution Inc. – Niğde 1 Operations		1
14	Kemalpaşa Neighborhood	Niğde	Ulukışla	28.01.2026							Ulukışla Municipality		1
15	Kemalpaşa Neighborhood	Niğde	Ulukışla	28.01.2026							Ulukışla Municipality		1
16	Kemalpaşa Neighborhood	Niğde	Ulukışla	28.01.2026							Ulukışla Chamber of Agriculture		1
17	Kömürcü Village	Niğde	Central	28.01.2026							Niğde Kömürcü Village Alevi-Bektashi Association		1
18	Seslikaya Village	Niğde	Bor	28.01.2026	A visit was made to the Kalyon Solar Power Plant. Since the security officer had previously been interviewed in Badak Village, only photographs were taken.								
19	Seslikaya Village	Niğde	Bor	28.01.2026	Smart Verde Solar Power Plant – Security Officer		1						
20	Emen Village	Niğde	Bor	28.01.2026	EcoGreen – G4 BOR-2 Günel Solar Power Plant-Operations Manager		1						
21	Bor District	Niğde	Bor	29.01.2026							51 Haber Newspaper		1
22	Bor District	Niğde	Bor	29.01.2026							Bor Municipality		1
23	Bor District	Niğde	Bor	29.01.2026							Niğde District Directorate of Agriculture and Forestry	1	
24	Bor District	Niğde	Bor	29.01.2026							Bor Chamber of Agriculture		1
25	Bor District	Niğde	Bor	29.01.2026							Niğde Breeding Cattle Breeders' Association (Bor Branch)	1	
26	Bor District	Niğde	Bor	29.01.2026							Bor Women's Cooperative	1	

Settlement	Date	Quantitative Survey Tools	
		Household questionnaire	Mukhtar questionnaire
Alpagut	26.01.2026		
Altay			
Badak		23 Households interviews have been completed.	The mukhtar interview has been completed.
Bereket		15 Households interviews have been completed.	The mukhtar interview has been completed.
Kemalpaşa			
Seslikaya		21 Households interviews have been completed.	The mukhtar interview has been completed.
Alpagut	27.01.2026	25 Households interviews have been completed.	The mukhtar interview has been completed.
Altay		1 Households interviews have been completed.	
Badak			
Bereket			
Kemalpaşa		28 Households interviews have been completed.	The mukhtar interview has been completed.
Seslikaya			
Alpagut	28.01.2026		
Altay			
Badak			
Bereket			
Kemalpaşa			
Seslikaya			
Alpagut	29.01.2026		
Altay		4 Households interviews have been completed.	The mukhtar interview has been completed.
Badak			
Bereket			
Kemalpaşa			
Seslikaya			

Results	Household questionnaire	Remaining, if available	Mukhtar questionnaire	Remaining, if available
Alpagut	25	-	1	-
Altay	4	15	1	-
Badak	23	-	1	-
Bereket	20	5	1	-
Kemalpaşa	28	-	1	-
Seslikaya	21	-	1	-
Final Results	**121**	**20**	**6**	**-**

6.3 DETAILED ISSUES RAISED BY STAKEHOLDER GROUP

The table below summarises the key stakeholder groups consulted, the main issues raised during the engagement process, and the corresponding implications for the ESIA, highlighting how institutional, community, and sector-specific concerns need to be systematically integrated into the technical analyses, project planning, and the definition of mitigation and management measures.

Table 6-2 - Key Issues Raised and Implications for the ESIA/ Stakeholder Consultation Record, Design Changes, and Action Matrix

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
PAP (Local residents)	Household participant feedback indicates that opinions are predominantly positive. The Project is generally supported in the context of clean/renewable energy generation, regional investment, and potential economic benefits. Employment opportunities constitute the most frequently emphasized expectation, with participants highlighting demands for job creation for young people, prioritisation of local hiring, and contributions to the village economy. Participants also expressed positive views provided that the Project does not	Employment opportunities, identified by participants as the most frequently emphasized expectation, will constitute a key component of the socio-economic impact assessment. The Project's potential to generate employment, its approach to local hiring, and its possible contributions to the village economy will be analysed; Project commitments and expectation management measures will be defined within the ESIA. As support for the Project is largely contingent upon the limitation of environmental and sector-specific impacts,	**Implement local hiring commitments, strengthen GRM accessibility, disclose mitigation measures regularly, and monitor agricultural/livestock impacts.**	**Optimize fencing layout to avoid traditional livestock corridors and improve access arrangements during construction.**	Long-term concerns regarding temperature increase and micro-climate impacts remain under discussion and will be monitored during Project implementation.

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	adversely affect the environment, public health, agriculture, or livestock. Nevertheless, some participants voiced negative opinions and concerns. These concerns mainly relate to the reduction of agricultural and grazing land, potential damage to or cessation of livestock activities, possible increases in temperature, and impacts on nature. It was also noted that fenced areas may restrict animal access. In addition, some participants adopted a cautious stance towards the Project due to negative experiences associated with previous projects. Overall, the Project perception is positive; however, this favourable attitude appears to be largely contingent upon expectations that environmental impacts remain limited, local employment is provided, and tangible benefits are delivered to the village. A small number of	potential effects on environmental quality, community health, agriculture, and livestock will be assessed in detail. In this context, the reduction of agricultural and grazing land, land use changes, access restrictions, and the implications of practices such as fencing on livestock activities will be analysed. References to negative experiences associated with previous projects will be taken into account, and stakeholder engagement, disclosure activities, and the Grievance Mechanism (GM) will be addressed as integral components of Project planning and management systems. The limited level of knowledge or absence of expressed views among a small number of participants will be considered within the disclosure and			

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	participants stated that they had no opinion or lacked sufficient information on the matter.	stakeholder engagement processes.			
PAP (Local representatives)	The majority of participants stated that they were aware of the Niğde SPP Project developed by Tosyalı. While the mukhtar's office and local word-of-mouth emerged as the primary sources of information, some participants indicated that they were not aware of the Project. Participation in the information meeting was limited; some participants reported having attended, whereas others stated that no meeting had been held or that they had not participated. A number of participants referred to other existing or planned projects in the area. These included various SPP investments, a gold mine, and industrial estate / industrial zone projects. However, the provision of concrete recommendations based on experiences with	Land use and agricultural impacts: The most frequently raised issue by participants concerned the reduction of agricultural land and the potential adverse effects on agricultural production. Accordingly, land acquisition, land use change, and impacts on agricultural livelihoods will be analysed in detail, and risks such as crop loss, access restrictions, and land fragmentation will be assessed. Livelihoods and economic impacts: Concerns related to farming activities indicate the need to strengthen the livelihoods assessment. Potential income impacts on vulnerable groups and land-dependent households will be identified; where deemed necessary, a	Strengthen consultation processes, disclose parcel-specific information, improve participation methods, and integrate local employment measures.	Engagement activities and disclosure channels revised to include more accessible and continuous consultation mechanisms.	Some uncertainty remains regarding long-term agricultural impacts and adequacy of local benefits.

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	these other projects remained quite limited. Although questions regarding the Project were generally few, some participants specifically sought information on whether employment opportunities would be provided for young people and whether support mechanisms would be available for the local community. Perceptions of potential impacts varied. Some participants emphasized possible adverse effects on agricultural production and farming activities, while others expressed that the Project could generate positive benefits in terms of clean energy generation and employment. The reduction of agricultural land was among the key concerns raised. Overall, while there is a degree of awareness about the Project, expectations and sensitivities appear to be concentrated particularly around	Livelihood Restoration Plan (LRP) will be developed. Employment and local benefits: Expectations regarding employment opportunities for young people and local support have come to the forefront. The Project's employment generation potential, local hiring policies, and capacity-building measures will be clarified in the ESIA, and expectation management will be ensured. Stakeholder engagement and disclosure: Limited participation in information meetings highlights the need to review engagement processes in terms of accessibility and inclusiveness. Ongoing disclosure, feedback mechanisms, and the Grievance Mechanism will be strengthened. Mitigation and management			

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	employment opportunities, local benefits, and agricultural impacts. Most participants did not provide additional comments.	measures: Measures aimed at protecting agricultural activities (including access arrangements, construction planning, and compensation principles) together with social benefit and communication strategies will be clearly defined in the ESIA.			
Other Interested Parties (Governmental institutions)	During the meetings with local institutions, it was observed that an investment project focused on clean energy is generally welcomed. The discussions emphasized that the main sources of livelihood in the region are agriculture and livestock; however, due to ongoing drought, the productivity of these activities has declined, and the population has increasingly turned to alternative sources of income. In this context, giving priority to local employment within the project was highlighted as a measure that would create a positive impression in the	Within the project objectives, local employment will be prioritized in project design and implementation, taking into account the region's economic vulnerability and the shift toward alternative income sources. Risks related to the sustainability of agriculture and livestock and changes in local livelihoods will be assessed to enhance the social acceptability of investment. In addition, local economic benefits and employment opportunities will be incorporated into the planning to	Incorporate local employment priorities and monitor socio-economic impacts throughout Project lifecycle.	Project implementation strategy updated to prioritize local workforce recruitment where feasible.	No major unresolved concerns identified by institutions at this stage.

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	region from the perspective of the project implementers.	strengthen the positive perception of clean energy-focused projects in the region.			
Other Interested Parties (Nearby businesses)	Meetings with local businesses indicate that the regional population is familiar with such projects. Past experiences, such as feed support provided by some companies, have shown that these types of assistance are not sustainable in the long term. Therefore, it was noted that providing training to the local population on agriculture and livestock would create a more effective support mechanism. In addition to contributions to the region, such as cemetery renovations, installation of security cameras, and feed supply, it was observed that companies employ local residents as security personnel. However, it was also emphasized that local employment can occasionally lead to the spread of misinformation within the village.	The ESIA process may include training and capacity-building programs for the local population on agriculture and livestock to strengthen long-term support mechanisms. Project design and implementation will integrate regional contributions, as the employment of local residents. Communication and information-sharing systems will be established to manage and prevent the spread of misinformation arising from local employment.	Develop community support and awareness programs and strengthen communication systems.	Project social investment approach revised to include potential training and capacity-building activities.	Sustainability and long-term ownership of community support measures remain to be further defined.

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
Vulnerable groups	According to the focus group discussions, the main sources of livelihood in the region are agriculture and livestock. However, factors such as water scarcity, climate, and geographical conditions make these activities quite challenging. These constraints result in irregular income from agricultural and livestock activities. The discussions highlighted that for any investment in the region to be considered successful, it should provide direct employment opportunities for the local population. Similar concerns regarding employment and income were raised in the migrant focus group. The study found that the local population is not sufficiently inclusive toward migrants and that migrants have less information about the project details compared to locals. The observed hesitation during the discussions was associated	For the ESIA, project design and implementation should include mechanisms to provide local employment opportunities. The potential impacts on agriculture and livestock activities need to be carefully assessed. Special communication and inclusive engagement strategies are required to ensure that migrant groups have access to the project and are adequately informed.	Provide simplified and inclusive disclosure materials, targeted consultations, and equitable access to GRM.	Stakeholder engagement approach updated to include targeted outreach to migrants/non-Turkish speakers and vulnerable households.	Social integration and equal participation of migrants remain sensitive issues requiring continuous monitoring

Stakeholder Group	Issues Raised	Implications for ESIA	Agreed Follow-up Actions & Mitigation Measures	Design Changes / Project Response	Unresolved Concerns & Status
	with migrants' sense of being outsiders in the region and their social status.				

6.4 KEY RECOMMENDATIONS

The key recommendations from stakeholders, taking into account the various engagement activities implemented across the different phases of the process, are presented below:

- The overall perception of the Project is positive. Stakeholders primarily recommended the provision of local employment, with particular emphasis on opportunities for young people and the prioritisation of local hiring. Participants also highlighted expectations regarding tangible benefits and support for the local community;
- Stakeholders underscored the importance of careful environmental and social impact management, especially the protection of agricultural land, farming, and livestock activities. Sensitivities were expressed concerning potential land loss and production-related impacts;
- Additional recommendations included the continuation of regular information disclosure and the maintenance of accessible feedback and grievance mechanisms. While other projects in the area were mentioned, experience-based recommendations remained limited;
- The project should prioritize local employment to support livelihoods affected by declining agricultural and livestock productivity, enhancing the project's positive reception in the region;
- Training on agriculture and livestock should be provided to the local population to ensure sustainable support, while local employment should be managed to minimize misinformation within the community; and
- Direct employment opportunities should be provided to the local population to support livelihoods affected by challenging agricultural and livestock conditions.

7 FEEDBACK AND GRIEVANCE MECHANISM

7.1 INTRODUCTION

Stakeholder engagement is a two-way process. It is therefore essential to establish a formal mechanism allowing stakeholders affected by or interested in the Project to submit opinions, suggestions, feedback, and grievances for review and, if necessary, for redress.

Even when certain feedback or grievances are not deemed "valid" or directly applicable to the Project's context, the Feedback and Grievance Mechanism (FGM) must operate in a transparent and non-judgmental manner, recording all feedback received.

For the Tosçelik Niğde Solar Power Plant Project, this mechanism constitutes a key tool to ensure that stakeholder concerns are systematically received, documented, and addressed throughout the Scoping and ESIA phases, and subsequently during the construction and operation phases of the Project.

The GM will also serve as a tool to document how stakeholder feedback, concerns, and recommendations are considered within Project decision-making, mitigation measures, management plans, and ongoing stakeholder engagement activities. Feedback received through the mechanism will be periodically reviewed to identify recurring issues, emerging risks, and opportunities for improvement.

Contractors and subcontractors will be required to comply with the Project GM procedures and cooperate in the timely investigation and resolution of grievances related to their activities.

Core principles for grievance mechanism:

Accessibility: The grievance mechanism is accessible to all stakeholders, including vulnerable and disadvantaged groups, and does not impose financial, linguistic, physical, or administrative barriers to access. Multiple grievance uptake channels will be made available, including face-to-face submissions, telephone, e-mail, online forms, QR code access, grievance boxes, and submissions through Community Liaison Officers (CLOs) and mukhtars. Hardcopy grievance forms will also be available at accessible community locations.

Confidentiality and Data Protection: All grievances are handled in a confidential manner, and personal data are processed and protected in accordance with applicable data protection legislation and company policies. Sensitive grievances, including those related to SEA/SH, GBV, discrimination, retaliation, and human rights concerns, will be handled through confidential and survivor-centred procedures with restricted access to information.

Anonymity: Stakeholders may submit grievances anonymously, and anonymous grievances are assessed and addressed in the same manner as non-anonymous submissions. Anonymous grievances will be accepted through grievance boxes, QR

codes, online channels, telephone communication, and verbal submissions through CLOs. Anonymous grievances will be registered, assessed, and addressed to the extent possible without requiring identification of the complainant. The absence of contact details will not prevent the grievance from being reviewed and incorporated into Project monitoring processes.

Non-Retaliation: No form of retaliation, intimidation, or adverse treatment will be tolerated against any individual who raises a grievance in good faith.

Non-Discrimination: Grievances are received, assessed, and resolved without discrimination of any kind, including on the basis of gender, age, ethnicity, disability, nationality, employment status, or any other personal characteristic.

Transparency and Fair Process: The grievance process is implemented in a transparent, consistent, and fair manner, with clear procedures, defined timelines, and documented outcomes.

SEA/ SH and GBV issues: Stakeholders will be informed about the guide prepared by the IFC regarding the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV). Complaints related to GBV and SEA may lead to a culture of silence due to societal stigma. To counter this, stakeholders will be aware of the option to anonymously report such project-related complaints concerning these issues. Complaints related to SEA/SH and GBV will be managed using a survivor-centred approach that prioritises confidentiality, safety, dignity, and informed consent. Dedicated focal points and referral pathways to relevant support services will be established where feasible. Information regarding confidential reporting channels and available support mechanisms will be disclosed to workers and community members.

Worker GRM Separate but coordinated grievance channels will be available for Project workers in line with Employment and Workforce Management Plan (EWMP) and Labor Management Plan (LMP) Worker grievances will be managed independently from community grievances while maintaining appropriate coordination for shared issues.

Ethical Misconduct: Allegations of ethical misconduct are taken seriously and are assessed in a timely, impartial, and confidential manner in accordance with the Company's Code of Conduct and applicable laws.

Human Rights Violations: Allegations of human rights violations are addressed in line with applicable national legislation and international standards, with a commitment to prevent, mitigate, and remedy adverse human rights impacts

Land acquisition grievances Land acquisition, easement, compensation, and livelihood-related grievances associated with ETL activities will be separately tracked and coordinated with relevant responsible institutions, including TEİAŞ where applicable, to ensure transparency and timely resolution.

Response Timeline and Escalation Grievances will be acknowledged within a defined timeframe and assessed according to their level of severity and complexity. Where feasible, responses will be provided within 30 calendar days. If a grievance cannot be

resolved within the expected timeframe, the complainant will be informed of the reason for delay and the anticipated next steps.

If stakeholders are not satisfied with the proposed resolution, they will have access to an escalation process, including referral to senior Project management and, where applicable, external judicial or administrative mechanisms.

Monitoring and Reporting Grievance trends, resolution status, recurring issues, and stakeholder concerns will be periodically monitored and analysed to improve Project management measures and stakeholder engagement activities. Aggregated grievance data will be incorporated into internal monitoring and external reporting processes, while maintaining confidentiality requirements.

7.2 ROLES AND RESPONSIBILITIES

Tosyalı shall retain primary responsibility for receiving, logging, and monitoring all grievances. Grievances related to contractor or subcontractor activities shall be forwarded to the relevant contractor for resolution, while Tosyalı maintains oversight to ensure timely and satisfactory closure.

Table 7-1 – Project GM Roles and Responsibilities

GM Roles	Responsibilities
Senior Management	• Allocates resources and approves necessary actions for resolving complaints and requests from both internal and external stakeholders. Reviews consolidated grievance data covering all stakeholder groups during Management Review Meetings (MRM).
Environment & Social Team	• Prepares, implements, maintains, and reports all records under this procedure. • Ensures the accuracy, confidentiality, and version control of all records and notifications. • Consolidates and analyses notifications monthly by topic, frequency, and resolution trends, and tracks follow-ups. • Presents analysis results as inputs to Management Review Meetings (MRM) and continuous improvement programs. • Provides internal training and raises awareness for employees and contractors on reporting channels and non-retaliation principles. • Handles all social and environmental grievances in line with IFC Performance Standards, particularly PS1 and PS4. • It ensures that the requests and complaints received from the Social Expert and CLO are communicated to senior management and that appropriate actions are taken.

GM Roles	Responsibilities
Social Expert	• Evaluates grievances related to social performance, stakeholder engagement, labor influx, land-related issues, or community health and safety. • Supports the E&S Team in assessing the social implications of complaints and develops appropriate corrective or preventive actions. • Ensures that responses and actions align with IFC Performance Standards, particularly PS1 (Assessment and Management of E&S Risks and Impacts) and PS4 (Community Health, Safety, and Security). • Contributes to the preparation of social monitoring reports and periodic updates for lenders, Independent Environmental and Social Consultant (IESC), or regulatory authorities. • Provides expert advice to the CLO and relevant departments on complex or recurring social issue.
Community Liaison Officer (CLO)	• Acts as the focal point for external stakeholders, community members, and local authorities to receive and facilitate community-related requests, complaints, and suggestions. • Ensures that all external grievances, particularly those related to community and stakeholders, are properly logged, categorized, and referred to the E&S Team for assessment. • Maintains direct communication with affected communities to ensure clear understanding of the grievance mechanism and promote transparency. • Follows up with complainants to confirm their satisfaction with resolutions and documents outcomes in the grievance register. • Reports monthly summaries of community grievances and responses to the E&S Team and Project Management.
All Employees, Contractors, and Stakeholders	• All **internal and external stakeholders** are responsible for submitting requests, complaints, and suggestions accurately and honestly through designated communication channels. • They are also expected to cooperate fully during investigation and follow-up processes.
Worker Representative	Authorized to represent employees in matters related to Occupational Health and Safety (OHS), including participation in activities, monitoring activities, requesting measures, making recommendations, and so on, the employee representative forwards requests, suggestions, and complaints to the Human Resources (HR) and E&S departments. The employee representative is responsible for determining whether the request, suggestion, or complaint has been resolved and, as a result, providing the relevant employee with the necessary information.

GM Roles	Responsibilities
Human Resources (HR) Officer:	Manages labor-related grievances in line with the Ethics Procedure and IFC PS2. Ensures confidentiality and fair resolution of employee complaints.
Grievance Redressal Committee (GRC)	A Grievance Redressal Committee (GRC) shall be established to address grievances that cannot be resolved at the initial level. The GRC shall include representatives of Tosyalı, relevant contractors, and independent experts or local representatives, as defined in the SEP.

7.3 METHODOLOGY

7.3.1 REPORTING CHANNELS AND RECODING

The primary responsibility of Tosyalı is to record and monitor complaints. In addition to Tosyalı, the social staff of the contractor will also be present on-site, following the guidelines in the SEP. Their duties include the recording and management of complaints. These designated personnel will adhere to the Grievance Mechanism to document and address all complaints from stakeholders, overseeing the specified mitigation measures. To enhance stakeholder awareness and facilitate transparent complaint submissions, project contact information will be disseminated via information meetings, project brochures, and the project website. This procedure does not limit or restrict stakeholders' rights to access administrative or judicial remedies. Presidency's Communication Center (CİMER) and Foreigners Communication Center (YİMER) as official channels are also available for stakeholders to voice their complaints. The complainant's right to petition is also guaranteed by the Law on the Exercise of the Right of Petition (Law No. 3071). Ethical issues will be reported to the Holding's ethics email address or relevant personnel via verbal communication. Contact details are provided below.

Anonymous grievances will be accepted through grievance boxes, QR code and online channels. Anonymous grievances will be registered, assessed and closed to the extent possible, without requiring identification of the complainant. All Project-level grievance contact points, access locations and responsible persons will be disclosed prior to construction.

Community grievance channels may include CLO contact details, e-mail, telephone, grievance boxes, QR codes, website access, mukhtar offices and face-to-face communication channels.

External stakeholders include local communities, neighbouring organizations, national or local government institutions, non-governmental organizations, suppliers, academic institutions, media outlets, and other entities. External stakeholders may file grievances or provide feedback anonymously or by willingly sharing their personal information, free of charge, and can initiate the grievance/feedback mechanism through the following channels.

Prior to the commencement of construction activities, the Project will finalise and disclose the community grievance mechanism, including all Project-level contact points, access locations, submission channels and implementation responsibilities.

The Project will ensure that affected communities are informed about the grievance mechanism and are able to submit grievances anonymously through accessible and confidential channels.

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

Tosçelik Profil Ve Sac Endüstrisi A.Ş

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

Project

- Address: Badak Köyü Tosyalı SPP Project Area Bor / Niğde
- Contact person of Tosyalı: Hasan Emre KÖYCÜ (CLO)
- Phone number of contact person: 0537 257 74 09
- e-mail address: ges.projegelistirme@tosyaliholding.com.tr
- 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 Project-level grievance contact and access points (phone number, email) details shall be disclosed at implementation, including project phone numbers, project site address, and designated Community Liaison Officers (CLOs) of Tosyalı and contractors.

Grievance registration forms and Grievance boxes shall be made available at the project site and at accessible public locations such as village centres, mukhtarship buildings, contractor offices, and others.

Project-specific electronic grievance submission tools (QR codes and web-based platforms) shall also be used for receiving grievances.

Recognizing the limitations of manual forms, QR code application plates will also be placed at the relevant locations to facilitate immediate submission of complaints and requests, thereby enabling more efficient management.

The Worker Complaint QR Code will be generated (for accident, near miss, incident, danger, inappropriate notification and wish complaint notifications)) for Tosyali and subcontractor employees and will be placed in the related area.

Worker Complaint QR Code:

Suggestions and complaints from external stakeholders and affected groups are received via another generated QR code for social purposes and tracked through the same system.

Social Impact QR Code:

Complaints received through the QR application automatically come to the E&S personnel's email address upon entry. Following this, the E&S team records the incoming request in Grievance Database and F.01.07.08 Wishes, Suggestions, Complaints, Follow-Up Evaluation Form and ensures that appropriate actions are taken.

For external stakeholders, QR codes and information are placed in public locations like community centres, local government offices, mukhtarship buildings and contractor offices.

<u>Other channels:</u>

Presidency's Communication Centre (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 Centre (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.

Complaints submitted to CİMER and YIMER by stakeholders are recorded on the Grievance Database and the ‘F.01.07.08 Wishes, Suggestions, Complaints, Follow-Up Evaluation Form ‘ and tracked.

For the scope of Project-specific Livelihood Restoration Plan

Turkish Electricity Transmission Company (TEİAŞ) 11th Regional Directorate

Osman Kavuncu Neighborhood, Osman Kavuncu Boulevard No: 269, 38130 Melikgazi, Kayseri, Türkiye

Tel: +90 (352) 315 40 00

Fax: +90 (352) 331 12 82

KEP Address: teias.11bolgemd@hs01.kep.tr

Interface Management Plan (IMP) of the Niğde SPP Project defines roles and responsibilities of the Parts as Tosyalı and TEİAŞ. TEİAŞ assumes ownership and operational control from the transmission system's connection point.

These points can be listed as follows:

Construction phase

- Coordination with TEİAŞ during the construction phase through formal written correspondence for approvals, opinions and interface Health, Safety, Security, Environmental and Social (HSSES) matters.
- Ensuring the implementation of IFC PS5 requirements related to ETL expropriation and easement processes in cases falling outside the scope of the legal expropriation process conducted by TEİAŞ.
- Coordinating with TEİAŞ regarding Project Affected Persons (PAPs), grievance management, stakeholder engagement activities, and follow-up actions related to ETL-induced land impacts.
- Recording complaints received regarding the project through channels such as TEİAŞ or CIMER, and documenting their respective resolution processes
- If TEİAŞ receives a complaint regarding construction activities or expropriation processes, it notifies Tosçelik. TEİAŞ resolves the issue if it falls within its own scope of responsibility; however, if the complaint pertains to Tosçelik's scope, TEİAŞ ensures the matter is resolved and monitors the follow-up process
- Project Affected Persons (PAPs) related to ETL land acquisition and easement processes may submit grievances either directly to TEİAŞ through official expropriation channels (CİMER etc.) or through the Project-level grievance mechanism.
- ETL-related grievances received by Tosçelik will be logged, monitored, coordinated with TEİAŞ where relevant, and tracked until closure.

Operation phase

- Ongoing coordination with TEİAŞ on interface HSSES risks between the SPP and the ETL, where relevant (e.g. emergency preparedness, access, safety interfaces)
- Documentation of coordination activities with TEİAŞ to demonstrate reasonable endeavours in managing Associated Facility interface risks during operation.
- In managing HSSES interfaces with TEİAŞ as the Associated Facility operator for the ETL, the Project Company will take into consideration relevant TEİAŞ legislation, internal procedures and corporate policies, as applicable, during HSSES coordination and communication activities.

Summary of the responsibilities of Tosçelik and TEİAŞ regarding grievance management are defined as follows:

- TEİAŞ shall remain the legally responsible authority for statutory expropriation processes, determination of compensation values, official valuation procedures, formal negotiations, and court-related expropriation matters in accordance with Turkish legislation.
- Tosçelik shall remain responsible for maintaining an accessible Project-level grievance mechanism for PAPs and communities affected by ETL-related activities, including grievances related to temporary access restrictions, construction-related damages, communication concerns, stakeholder engagement, livelihood impacts and implementation-related issues.

- Where grievances received by Tosçelik relate directly to statutory compensation valuation or formal expropriation decisions under TEİAŞ authority, Tosçelik will inform PAPs about the relevant TEİAŞ and judicial grievance routes and coordinate with TEİAŞ, where appropriate, to facilitate communication and follow-up.
- All ETL-related grievances received through the Project grievance mechanism will be recorded, tracked, monitored and closed in accordance with the Project SEP, LRP and grievance procedures.

Detailed information about ETL and expropriation related matters have been defined within Project specific IMP, and LRP, too.

The Physical Grievance boxes:

Wishes, suggestions, and request boxes are placed in areas accessible to both internal and external stakeholders (located in site/office and public areas). Complaints received through these boxes are reviewed weekly by the Social Expert and recorded on the form numbered F.01.07.08 Wishes, Suggestions, Complaints, Follow-Up Evaluation Form for evaluation and follow-up."

Available submission public Forms:

- F.01.07.03 Stakeholder Complaint Request Form
- F.01.07.04 Employee Complaint Form

Locations of Physical Grievance boxes

QR code brochures providing access to the Project Grievance Mechanism have been placed at accessible locations in all villages and district centres within the Project area of influence. Records of these activities are maintained and archived by Tosçelik. In addition, a grievance form and Project information brochures have been displayed at the Seslikaya village coffeehouse. The mukhtars of Badak and Bereke villages have also been informed about the availability of submitting grievances through the QR code. It is planned to install grievance boxes at these locations as well. All of these activities, including the planned actions, are being documented and maintained as part of the Project records.

Tailored engagement approaches and information disclosure for Disadvantaged / Vulnerable Groups are also considered upon implementation, in line with the SEP.

Requests and opinions gathered from face-to-face meetings held with stakeholders at regular intervals are also recorded in the same forms and Grievance Database, and relevant actions are taken, until the relevant action is completed and solution achieved.

7.3.2 Preliminary Review and Referral

Within the Grievance Mechanism, Tosyalı will be responsible for receiving, logging, and monitoring all grievances related to the Project. Tosyalı will forward contractor-related

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

For ETL-related land acquisition and compensation grievances, the interface between TEİAŞ statutory channels and the Project-level grievance mechanism is defined in the IMP. PAPs may submit grievances through either route. Tosçelik will record, monitor and coordinate ETL-related grievances with TEİAŞ where relevant.

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

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

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

All grievances when received are logged into a GM database through 'F.01.07.08 Wishes, Suggestions, Complaints, Follow-Up Evaluation Form' to facilitate the tracking and monitoring process.

Following thorough investigations, if resolving the issue falls under the responsibility of another unit, the complaint must be forwarded to the relevant unit within 2 business days. Depending on the importance of requests, suggestions and complaints, major complaints are responded to within 2 business days and minor complaints within 30 days.

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

Should the complainant feel that the grievance has not been satisfactorily addressed by the Tosyalı or Contractor, they may request the matter to be escalated to the next level.

A Grievance Redressal Committee (GRC) will be established, comprising local representatives and relevant institutional representatives. Independent experts will be selected from local universities, institutes, or non-governmental Organizations (NGOs) or other relevant institutes. The GRC will be activated if a resolution cannot be reached at the initial level.

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

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

In more detail the process is composed of:

Claim Receival

- Pre-approval/check: The Environment & Social Department reviews each submission within 2 business days and refers it to the relevant department (HR, OHS, Quality, Technical, etc.) based on the subject.
- Urgent/critical cases (OHS risk, environmental incident, ethical breach) are handled immediately in accordance with the relevant emergency procedures and reported simultaneously to managers/the escalation line.
- Classification: Labelled as Request / Complaint / Suggestion / priority and target resolution time are determined.

Investigation and Evaluation

- The department responsible evaluates the notification and, if necessary, conducts site observations, collects data/evidence, and holds interviews.
- For complaints/incidents requiring root cause analysis, a Corrective Action (CA) is opened.
- Suggestions are scored against applicability criteria (benefit, cost, risk, legal compliance) and feasible ones are included in the improvement plan.

Feedback and Communication

- Depending on the importance of requests, suggestions and complaints, major complaints are responded to within 2 business day and minor complaints within 1 month.
- If the complaint is conveyed through suggestion boxes—provided that suggestion boxes at workplaces will be opened on a weekly basis the

complainant will be informed within two days after the suggestion box is opened.

- For prolonged cases, interim updates are provided and a new target date is shared.
- Principles of confidentiality, data protection, and non-retaliation (reprisal) are observed.

Implementation of Corrective Actions

- In case a nonconformity is identified, a Corrective Action is initiated; the responsible person, target date, and verification method are defined.
- Records are not closed until verification and effectiveness evaluation are completed.
- For environmental and/or OHS incidents and quality nonconformities, the relevant statutory notifications and internal reporting obligations are fulfilled.

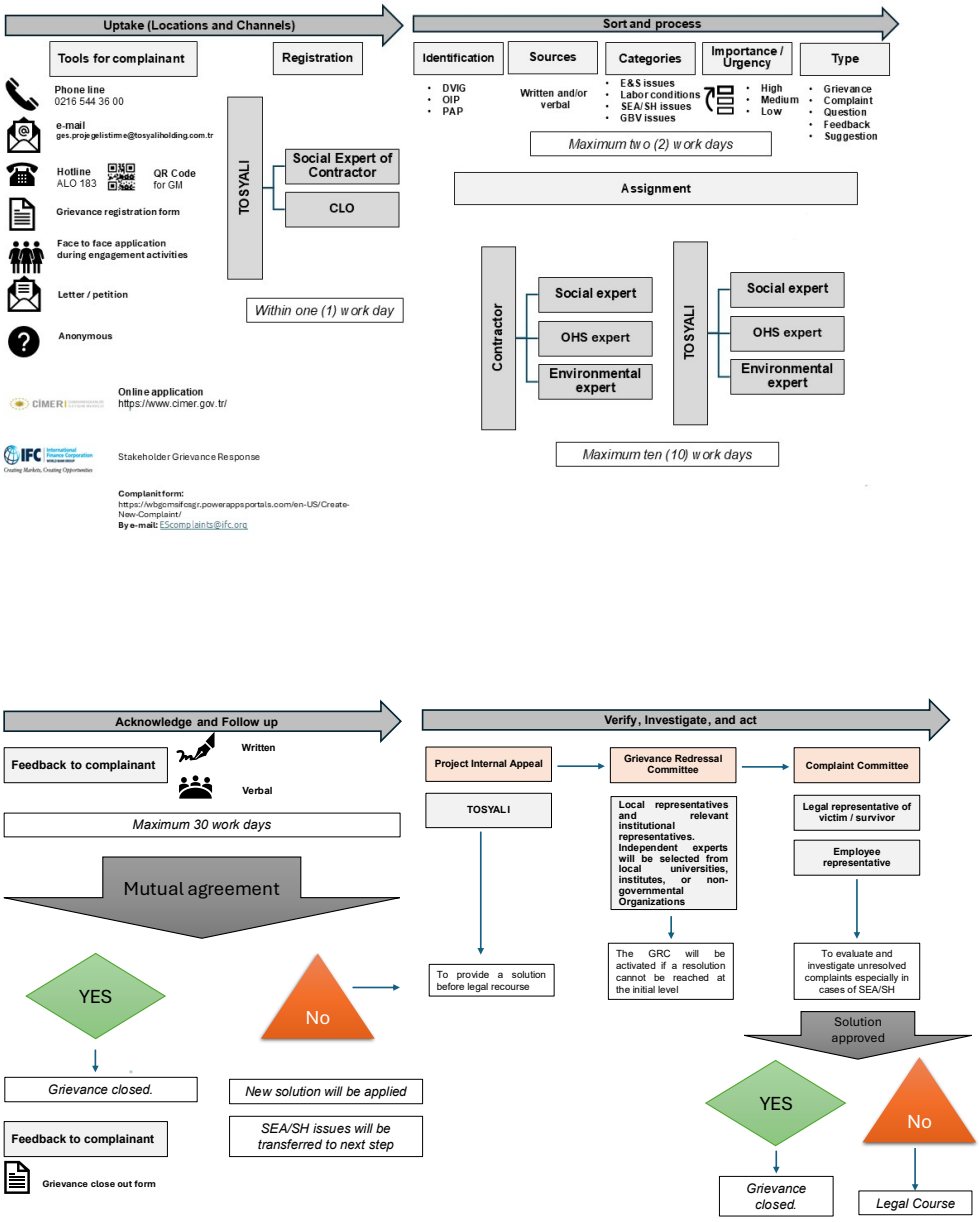


Figure 7-1 – Grievance Mechanism Process

7.3.3 Workers Grievance Mechanism

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

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

The WGM will be established according to the procedure below:

- Step 1: Informal discussion: Managers and workers are encouraged to use informal methods of resolving disagreements or disputes. If employees have a reasonable grievance or complaint regarding their work or the people they work with they will, wherever possible, start by talking it over with their manager. If discussions with line managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure, i.e., a human resources (HR) manager could host an informal meeting or discussion.
- Step 2. Formal grievance: If the matter is serious and/or the employee wishes to raise the matter formally, they will set out the grievance in writing to their manager. Where the grievance is against the employee's manager and the employee feels unable to approach them, the employee will address the grievance to another manager or the HR department. If there is a trade union at the workplace, the employee may wish to ask a union representative for advice and support.
  The contractor will provide appropriate channels to uptake formal grievances for the worker, i.e., e-mail, telephone, suggestion boxes. Especially, suggestion boxes will be placed so that anonymous grievances can be made. Anonymous

complaints can be submitted through complaint boxes or the QR code complaint reporting software.

- Step 3. Grievance hearing: A designated manager (normally from the HR department, hereafter the "grievance manager") will call the employee to a meeting, within a determined period after receiving the complaint, to discuss the employee's grievance. The employee will have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. After the meeting, the grievance manager will give the employee a decision in writing, within a determined period.
- Step 4. Appeal: If the employee is unhappy with the grievance decision and wishes to appeal, then the employee will be invited to an appeal meeting within a defined period and the appeal will be heard by a more senior manager, ombudsman or a grievance committee. The members of grievance committee will consist of at least the grievance manager, employee's manager (responsible from the work definition of the employee), one manager from the upper management and the aggrieved party/worker representative. The employee will normally have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. Every effort will be made to secure a resolution in the best interests of the worker(s) and the company. After the meeting, the senior manager, ombudsman or grievance committee will give the employee a decision. This decision is final within the terms of the company's internal grievance mechanism. If the worker is not satisfied, he or she will have the right to judicial or administrative channels.

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

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

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

Contractors will keep the written copies and a written list of complaints submitted to them. In addition, to facilitate analysis, monitoring and reporting, these complaints will be logged into the Grievance Database, indicating contractor/subcontractor, type of complaint and solution. Contractors will send a copy of this database to the Social Officer

of Tosyalı once a month, within the framework of standard reporting. The Social Officer of Tosyalı will maintain a master database of all complaints during the Project.

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.

7.3.4 Sexual Exploitation and Abuse / Sexual Harassment

The Project GM will have a dedicated section for grievances related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH). The process for filing a grievance must be simple and easy to understand and clearly prohibit any kind of reprisal against workers or community member who file grievances, including those relating to sexual harassment.

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

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

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

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

Türkiye already has a national referral system for SEA/SH, and workplace related harassment, bullying, and violence, and there are provisions in both the Labor Law and the Penal Code for this type of behaviour that is deemed unacceptable.

In addition, psycho-social support is also provided and available for survivors. When necessary, the social expert will refer the survivors to the Ministry of Family and Social Services call centre (ALO 183) for SEA/SH, and to the Ministry of Labor and Social Security call centre (ALO 170) for workplace-based psychological harassment-mobbing, violence, and bullying, etc. and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues.

SEA/SH-related information will be accessible only to authorised personnel and will not be recorded in a way that allows identification of survivors in general grievance reports.

7.3.5 RECORD RETENTION

Records of requests, complaints, suggestions, and incidents (forms, e-mails, software outputs, CA documents) are retained for at least 3 years. Version control and access permissions for the records are managed by the Environment & Social Department.

8 MONITORING AND REPORTING

8.1 INTRODUCTION

To ensure the effectiveness of stakeholder engagement and responsiveness to stakeholder concerns, monitoring will be carried out continuously throughout the Scoping, ESIA, and future Project phases.

8.2 MONITORING STAKEHOLDER ENGAGEMENT ACTIVITIES

The Tosçelik Project Team, with the support of the ESIA consultants, will establish an internal monitoring and evaluation system to assess the effectiveness and performance of stakeholder engagement activities throughout the Project lifecycle.

Suggested monitoring and evaluation activities are outlined below:

- Monitor the grievance register in terms of response times to address complaints logged as well as the recurrence of complaints over time;
- Regular update of the stakeholder register;
- Monitoring media coverage related to Tosçelik and the Niğde Solar Power Plant Project;
- Keep records of all engagement activities undertaken and minutes of meetings of all the meetings held with stakeholders;
- Keep a database (electronic or hard copy) of all communication material (billboards, posters, video, etc.);
- Develop internal Project reporting related with social performance;
- Develop and assess performance in terms of Key Performance Indicators (KPIs); and
- Revise plans and activities.

8.3 REPORTING STAKEHOLDER ENGAGEMENT ACTIVITIES

All stakeholder engagement activities conducted throughout the life of the Project will be systematically documented and organised to enable tracking of:

- the fulfilment of commitments made to stakeholders;
- the progress of grievances and corrective actions; and
- the ability to refer to past records when required.

The principle "if it isn't documented, it never happened" applies to all stakeholder-related records associated with the Project.

The following stakeholder engagement records and documentation will be established and maintained for the Tosçelik Niğde Solar Power Plant Project:

- **Stakeholder Engagement Database** – to be established and maintained to systematically store, analyse, and report on stakeholder engagement activities. This database will include details of information disclosed, issues and questions raised by stakeholders, and the responses and actions undertaken by the Tosçelik Project Team;
- **Meeting Minute Template** – to be used to record minutes of all meetings and filed in the stakeholder engagement database;
- **Stakeholder List** – to be continuously updated with key contacts and contact information (telephone, email, institutional affiliation) as new stakeholders are identified; and
- **Grievance Log** – to register all grievances received, document management actions, and track closure status.

To ensure that the implementation of this SEP remains effective, regularly monitored, and verifiable, the following Key Performance Indicators will be applied, where appropriate:

- Percentage of Project documents disclosed to stakeholders in accordance with the SEP and the Environmental and Social Management Plan (ESMP);
- Number of stakeholder engagement activities conducted, by stakeholder group and location, compared with planned activities;
- Number of commitments fulfilled between the Project management and communities neighbouring the Project area;
- Number of public sessions or awareness campaigns aimed at maintaining community safety and health;

- Number of activities supporting women's access to information, consultation, and participation;
- Number of activities targeting the inclusion of vulnerable or disadvantaged groups;
- Number of media announcements or public information releases;
- Number of community grievances received, disaggregated by gender and affected community;
- Percentage of grievances resolved within the agreed timeframe; and
- Recurrence rate of similar grievances, as an indicator of whether the Project is learning from experience and improving its environmental and social performance.

During Project implementation, the above monitoring indicators will be collected, consolidated, and analysed centrally by the Tosçelik Project Team, with the support of environmental and social specialists, as required.

Stakeholder engagement performance will be documented and reported through quarterly Social Monitoring Reports, which will highlight key engagement activities, lessons learned, best practices, and opportunities for continuous improvement. These reports will be retained as part of the Project's environmental and social documentation and made available to relevant stakeholders, as appropriate.

Ongoing Reporting to Affected Communities

Affected communities will be periodically informed on Project progress, implementation of mitigation measures, key construction activities, traffic/access restrictions, grievance trends and closure status, and any material E&S incidents. Information will be shared during construction through community meetings, mukhtars, notice boards, brochures, website updates and CLO communication.

8.4 GRIEVANCE MANAGEMENT

As outlined in Section 7.3, all grievances received will be recorded in the grievance register and will receive an acknowledgment of receipt within a defined timeframe, confirming that the grievance has been received and is under review.

Once the appropriate corrective action has been agreed upon by the relevant parties and communicated to the complainant, the Tosçelik Project Team will implement the agreed measure and will aim to close the grievance within 30 calendar days from the date of receipt, where feasible.

A Grievance Management System will be established to track the receipt, processing, investigation, and resolution of all grievances, ensuring that cases are handled in a

consistent, transparent, and timely manner, in accordance with the procedures defined in this SEP.

Grievance trends, recurring issues and corrective actions will be periodically reviewed to identify areas requiring additional mitigation or stakeholder engagement measures.

It is anticipated that some grievances will be simple in nature and may be resolved directly by Project staff on site or by representatives of the Engineering, Procurement and Construction (EPC) contractor.

Notwithstanding their simplicity, all grievances will be formally registered and monitored by the designated focal point until closure.

More complex grievances may require additional investigation and, where appropriate, the involvement of a third party. Whenever possible, amicable solutions will be sought as the first option.

If an amicable resolution cannot be achieved directly between the Project and the complainant, mediation by a third party (such as a community representative or local authority) may be pursued.

Should mediation fail, the complainant retains the right to seek resolution through the judicial system of the Republic of Türkiye, in accordance with applicable national legislation.

Accordingly, three potential levels of grievance resolution are envisaged:

- Amicable settlement without mediation;
- Amicable settlement with mediation; and
- Legal action, as a last resort.

Main monitoring KPIs include, but not limited to:

- Response/ Closure time (days)
- Percentage of complaints requiring Corrective Action (CA)
- Repeated complaint rate

8.5 SEP REVIEW

The SEP is reviewed, updated and document-controlled. The SEP may also be updated in case of significant Project changes, new stakeholder groups, major grievances, emergency events or material changes in Project impacts.

- Annually;

- At the transition from one milestone/stage to another (e.g., from Scoping to ESIA);
- Following any significant changes in terms of activity, risk profile or incident.

Revisions are recorded in the ‘Review’ and ‘Description’ table at the beginning of the document.

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
Community consultations	Alpagut settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Community consultations	Altay settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Community consultations	Badak settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Community consultations	Bereket settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Community consultations	Kemalpaşa settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Community consultations	Seslikaya settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
Land acquisition and livelihood engagement	Land owners	Percentage of affected landowners consulted	100%	<90%	Monthly	CLO
Land acquisition and livelihood engagement	Formal land users	Percentage of users consulted	100%	<90%	Monthly	CLO
Land acquisition and livelihood engagement	Informal land users	Percentage of users consulted	100%	<90%	Monthly	CLO
Livelihood restoration and consultation	Farmers	Number of consultations conducted	≥2/year	<1/year	Monthly	CLO
Livelihood restoration and consultation	Livestock breeders	Number of consultations conducted	≥2/year	<1/year	Monthly	CLO
Vulnerable group engagement	Elderly persons (65+)	Participation rate in consultation activities	≥80%	<50%	Annual	CLO
Vulnerable group engagement	Persons with disabilities and chronic illness	Participation rate in consultation activities	≥80%	<50%	Annual	CLO
Vulnerable group engagement	Female-headed households	Participation rate in consultation activities	≥80%	<50%	Annual	CLO
Vulnerable group engagement	Afghan shepherd households and refugee households	Participation rate in consultation activities	≥80%	<50%	Annual	CLO

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
Vulnerable group engagement	Non-Turkish speaking individuals	Tailored communication measures implemented	100%	Any exclusion	Annual	CLO
Vulnerable group engagement	Households receiving social assistance and food insecure households	Participation rate in consultation activities	≥80%	<50%	Annual	CLO
Vulnerable group engagement	Illiterate adults	Tailored engagement measures implemented	100%	Any exclusion	Annual	CLO
Targeted stakeholder engagement	Toro Ulukışla Women's Cooperative	Number of dedicated meetings	≥1/year	No consultation conducted	Annual	CLO
Targeted stakeholder engagement	Bor Women's Cooperative	Number of dedicated meetings	≥1/year	No consultation conducted	Annual	CLO
Targeted stakeholder engagement	Niğde Kömürcü Village Alevi-Bektashi Association	Number of dedicated meetings	≥1/year	No consultation conducted	Annual	CLO
Institutional coordination	Niğde Municipality Directorate of Climate Change and Zero Waste	Number of coordination meetings	≥2/year	<1/year	Annual	E&S Team
Institutional coordination	Niğde Provincial Directorate of Environment and Urbanization	Number of coordination meetings	≥2/year	<1/year	Annual	E&S Team
Institutional coordination	Ulukışla Municipality	Number of coordination meetings	≥2/year	<1/year	Annual	E&S Team
Institutional coordination	Bor Municipality	Number of coordination meetings	≥2/year	<1/year	Annual	E&S Team
Institutional coordination	Niğde Provincial Directorate of	Number of coordination meetings	≥1/year	No meeting conducted	Annual	E&S Team

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
	Agriculture and Forestry					
Institutional coordination	Bor District Directorate of Agriculture and Forestry	Number of coordination meetings	≥1/year	No meeting conducted	Annual	E&S Team
Institutional coordination	Ulukışla Chamber of Agriculture	Number of consultations conducted	≥1/year	No meeting conducted	Annual	CLO
Institutional coordination	Bor Chamber of Agriculture	Number of consultations conducted	≥1/year	No meeting conducted	Annual	CLO
Institutional coordination	Niğde Breeding Cattle Breeders' Association	Number of consultations conducted	≥1/year	No meeting conducted	Annual	CLO
Information disclosure	All stakeholders	Percentage of Project documents disclosed in accordance with SEP and ESMP	100%	Any missing disclosure	Annual	CLO
Public information and media	51 Haber Newspaper and local media	Number of public announcements and information releases	≥2/year	No announcement	Annual	CLO
Community health and safety awareness	Communities within AoI	Number of awareness campaigns	≥1/year	No campaign	Annual	E&S Team
Women's participation	Women and women organizations	Number of activities supporting women's participation	≥1/year	No activity	Annual	CLO
Inclusion of vulnerable groups	Vulnerable stakeholders	Number of targeted engagement activities	≥1/year	No activity	Annual	CLO
Communication channels	All stakeholders	Website, e-mail, phone, QR code, grievance boxes and CLO channels operational	100%	Any interruption	Quarterly	CLO

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
Stakeholder database	All stakeholders	Stakeholder register updated	Quarterly	No update for >6 months	Quarterly	CLO
Record keeping	All engagement activities	Percentage of meeting records and minutes maintained	100%	Missing records	Quarterly	CLO
Grievance management	All stakeholders	Percentage of grievances registered	100%	Missing records	Monthly	CLO
Grievance resolution	All stakeholders	Percentage of grievances closed within 30 days	≥90%	<80%	Quarterly	E&S Team
Corrective actions	All stakeholders	Percentage of complaints requiring corrective action tracked and closed	100%	Unresolved corrective actions	Quarterly	E&S Team
Repeated complaints	All stakeholders	Repeated complaint rate	Decreasing trend	Increasing trend over two reporting periods	Quarterly	E&S Team
Community grievances	All stakeholders	Number of grievances received by gender and community	Recorded and reported	Missing disaggregation	Quarterly	CLO
Stakeholder commitments	Neighbouring communities	Percentage of commitments fulfilled	100%	<90%	Annual	Project Management
Social performance reporting	Entire Project	Quarterly Social Monitoring Reports issued	100%	Missing report	Quarterly	E&S Team
SEP review	Entire Project	SEP reviewed and updated	Annual	No review >12 months	Annual	Project Management
Project change management	Entire Project	SEP revised following major Project changes, incidents or new stakeholders	100%	No revision after material change	As required	Project Management

Table 8-1 describes monitoring and evaluation frameworks to illustrate SEP monitoring activities for Project cycle

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
Community consultations	Alpagut settlement	Number of community meetings conducted	≥2 meetings/year	<1 meeting/year	Annual	CLO
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Communication channels	All stakeholders	Website, e-mail, phone, QR code, grievance boxes and CLO channels operational	100%	Any interruption	Quarterly	CLO
Stakeholder database	All stakeholders	Stakeholder register updated	Quarterly	No update for >6 months	Quarterly	CLO
Record keeping	All engagement activities	Percentage of meeting records and minutes maintained	100%	Missing records	Quarterly	CLO
Grievance management	All stakeholders	Percentage of grievances registered	100%	Missing records	Monthly	CLO
Grievance resolution	All stakeholders	Percentage of grievances closed within 30 days	≥90%	<80%	Quarterly	E&S Team
Corrective actions	All stakeholders	Percentage of complaints requiring corrective action tracked and closed	100%	Unresolved corrective actions	Quarterly	E&S Team
Repeated complaints	All stakeholders	Repeated complaint rate	Decreasing trend	Increasing trend over two reporting periods	Quarterly	E&S Team
Community grievances	All stakeholders	Number of grievances received by gender and community	Recorded and reported	Missing disaggregation	Quarterly	CLO
Stakeholder commitments	Neighbouring communities	Percentage of commitments fulfilled	100%	<90%	Annual	Project Management
Social performance reporting	Entire Project	Quarterly Social Monitoring Reports issued	100%	Missing report	Quarterly	E&S Team

Subject	Stakeholder Group	KPI	Target	Threshold for Corrective Action	Frequency	Responsibility
SEP review	Entire Project	SEP reviewed and updated	Annual	No review >12 months	Annual	Project Management
Project change management	Entire Project	SEP revised following major Project changes, incidents or new stakeholders	100%	No revision after material change	As required	Project Management

Table 8-1 - Monitoring and Evaluation Framework

9 REFERENCES

IFC – International Finance Corporation (2007). *Environmental, Health, and Safety (EHS) Guidelines*. www.ifc.org/ifcext/enviro.nsf/content/environmentalguidelines

IFC – International Finance Corporation (2009). *Addressing Grievances from Project-Affected Communities: Guidance for Projects and Companies on Designing Grievance Mechanisms*. Good Practice Handbook. International Finance Corporation, Washington, DC.

IFC – International Finance Corporation (2012). *Performance Standards on Environmental and Social Sustainability*. Washington, DC. World Bank.

World Bank (2017). *Environmental and Social Framework.* Washington, D.C.: World Bank