



REPORT

**CAPACITY INCREASE OF PRODUCTION
FACILITY IN YALOVA**

STAKEHOLDER ENGAGEMENT PLAN

Submitted to:

DowAksa İleri Kompozit Malzemeleri San. Ltd. Şti.

Merkez Mahallesi Akasya 2 Sok.

No:3 Taşköprü-Çiftlikköy/Yalova

TÜRKİYE

T +90 226 353 21 60 - 17632

F +90 226 353 35 75

Preparation Date: March 2021

First Release Date: June 2022

Revision Date: January 2023

Revision No:2





This page intentionally left blank

Table of Contents

1.0 INTRODUCTION	1
2.0 PROJECT DESCRIPTION	1
3.0 PURPOSE AND SCOPE	7
4.0 PROJECT STANDARDS	8
4.1 Applicable Turkish Standards	8
4.2 Applicable International Standards and Guidelines.....	10
5.0 ROLES AND RESPONSIBILITIES	11
6.0 STAKEHOLDER ENGAGEMENT	15
6.1 Early Engagement	15
7.0 STAKEHOLDER IDENTIFICATION	15
8.0 STAKEHOLDER ENGAGEMENT PROGRAM	16
9.0 TOOLS & METHODS FOR INFORMATION DISCLOSURE	16
9.1 Internet/Web Site.....	16
9.2 Information Sheets	16
9.3 Responding to Local Communities and Publications for People	16
9.4 Disclosure Activities.....	17
10.0 MANAGEMENT OF GRIEVANCES	17
10.1 Grievance Mechanism Procedure.....	17
10.2 Grievance Mechanism Communication	18
10.3 Contact Details of DowAksa	19
11.0 MONITORING	19
11.1 Key Monitoring Activities.....	19
11.2 Key Performance Indicators	21
12.0 TRAINING	22
13.0 AUDIT AND REPORTING	22
13.1 Record Keeping.....	22

TABLES

Table 1: Populations of Project Directly Affected Settlements 6

Table 2: Project Environmental Permitting 6

Table 3: Roles and Responsibilities 11

Table 4: Key Monitoring Measures..... 20

Table 5: Key Performance Indicators 21

Table 6: Detailed Stakeholder List 25

FIGURES

Figure 1: Project Site Location Map 3

Figure 2: Map Showing Nearest Settlements 4

Figure 3: Map Showing Nearest Facilities and the House 5

APPENDICES

APPENDIX A

DETAILED STAKEHOLDER LIST

APPENDIX B

STAKEHOLDER ENGAGEMENT PROGRAM

APPENDIX C

COMPLAINT FORM

APPENDIX D

COMPLAINT REGISTRATION/CLOSURE FORM

APPENDIX E

GRIEVANCE LOGBOOK

APPENDIX F

MEDIA SEARCH

1.0 INTRODUCTION

Golder Associates Turkey Ltd. (“Golder”) has been contracted by DowAksa İleri Kompozit Malzemeleri San. Ltd. Şti. (“DowAksa” or the “Project Company”) for the provision of environmental and social (“E&S”) services during the due diligence process of the Capacity Increase of Production Facility in Yalova Project (“the Project”).

This Stakeholder Engagement Plan (“SEP”) is a document open to all stakeholders aiming to engage internal and external stakeholders in project decision-making mechanisms, to communicate with stakeholders and to share information about the Project. SEP has been prepared in line with the DowAksa’s environmental and social policies, international standards and IFC Performance Standards (“PSs”).

This SEP was prepared by Golder on behalf of DowAksa for the construction, operational and closure phases of the Project in line with the IFC PS 1 requirements and it is based on an evaluation of the stakeholder engagement program to date. The SEP identifies target groups and the specific range of engagement activities required for each group.

The SEP needs to be reviewed to ensure that it remains valid and meets the needs of DowAksa, local communities and other relevant stakeholders as identified in this SEP and to determine whether any changes or updates are required. This SEP will be reviewed frequently such as: bi-annually during the construction phase and at the transition of the construction phase to the operation phase; and annually during the operational phase. More frequent updates may be required to reflect any future changes in Project design or ESMS requirements and procedures. The updated SEP needs to be published and available for stakeholders.

Any requests for changes to this SEP should be addressed to its owner (DowAksa) and will be subject to appropriate review and approval processes.

2.0 PROJECT DESCRIPTION

Aksa Akrilik Kimya Sanayii A.Ş. and Dow Europe Holding BV have equal shares with 50:50 of DowAksa İleri Kompozit Malzemeler Sanayi Ltd Şti. The facility is currently located in Yalova City, Çiftlikköy District, Taşköprü Town, block 114, parcel number 15, on an area of 52,678 square meters, in a closed area of 40,369 square meters. The facility is active in the production of Carbon Fiber Tov and Chopped Fiber, Pultruded Plate and operates as the owner of the building in the parcel mentioned above.

DowAksa is planning to increase its carbon fiber production capacity by 10,500 tons/year, ensuring business relations with the world-class important customers operating in sectors such as wind energy and automotive with the production composite materials needed by these sectors.

The planned Project is located in Yalova Province, Çiftlikköy District, Taşköprü Town, 304 block 1 parcel on a treasury land of which right of easement is given to DowAksa in line with the Decree of the Council of Ministers No. 2018/11717 on Granting Project-Based Government Investment and the "Investment Place Allocation" specified under Article 3 (h) of the Decree Annex, for a period of 49 years, starting on 24 July 2018. The land is adjacent to YALKİM Organized Industrial Zone, close to the existing plant which will enable utilizing existing infrastructure such as electricity, steam, cooling water, wastewater treatment plant, etc. Within the scope of the project, pipe bridges will be established by connecting to existing lines for cooling water (feeding and return), deionized water, wastewater, fire water, potable water, electricity, and air transfer.

The closest settlement to the Project area is Taşköprü Town, located approximately 900 m southwest. The nearest house of Taşköprü Town is located 300 southwest to the Project area boundaries. The

Project area is located approximately 6 km from Çiftlikköy District center, 4.5 km from Tavşanlı Town, 2.5 km from Kabaklı Village and 10 km from Yalova city center.

According to the information gathered from EIA Report and Social Baseline and Impact Assessment Report, the project area was being used by 12 farmers residing in Taşköprü Town for agricultural / crop production activities until February 2021. These farmers cultivated their lands by leasing from the General Directorate of National Real Estate. According to the National Real Estate General Communiqué No. 3124,6 lease agreements are usually for 10 years, which shows that farmers engaged in agricultural activity in anticipation of a long-term income. 12 farmers engaged in some agricultural and ornamental plant cultivation activities by paying adequate pay (ecrimisil) in the incentive land were identified during on-site exploration made by the Çiftlikköy District Governorship and the Çiftlikköy District Directorate of Agriculture and Forestry. In August 2020, 8 of the 12 farmers filled a lawsuit to Treasury and requested the cancellation of the title deed of the incentive land owned by the Treasury and the registration of the title in their name. In order to complete the process peacefully and to bring a new and strategic investment to the country, Dowaksa initiated the negotiation process in line with the demands of all occupiers. The negotiation process was carried out under the knowledge of the Yalova Governorate under the management of the Çiftlikköy District Governorship. Golder observed that an agreement was reached with all the occupiers (12 people) on 16 November 2020 and it was agreed to end the entire dispute as recorded in Final Mediation Minutes. Dowaksa officials stated that compensation had been paid according to the best scenario for the farmers and they waived the substituted title deed cancellation and registration case in return for compensation. Waiver Hearing Minutes (dated 23 December 2020), Justified Decision (dated 23 December 2020) and Finalization Statement (dated 24 December 2020) was shared with Golder. As of February 26, 2021, the incentive land has been evacuated by all the occupants with their products.

Project site location map and the nearest settlements/facilities around the Project site are shown in below figures.

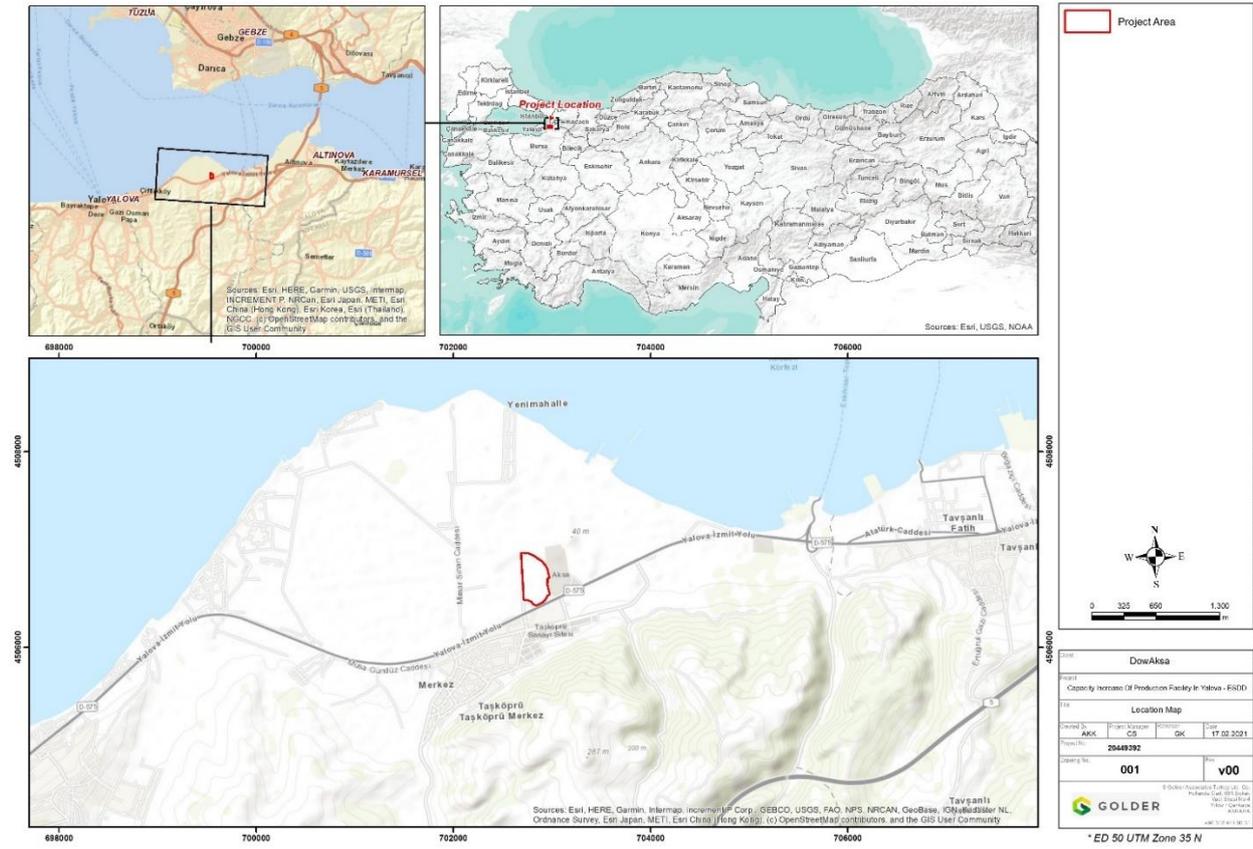


Figure 1: Project Site Location Map



Figure 2: Map Showing Nearest Settlements

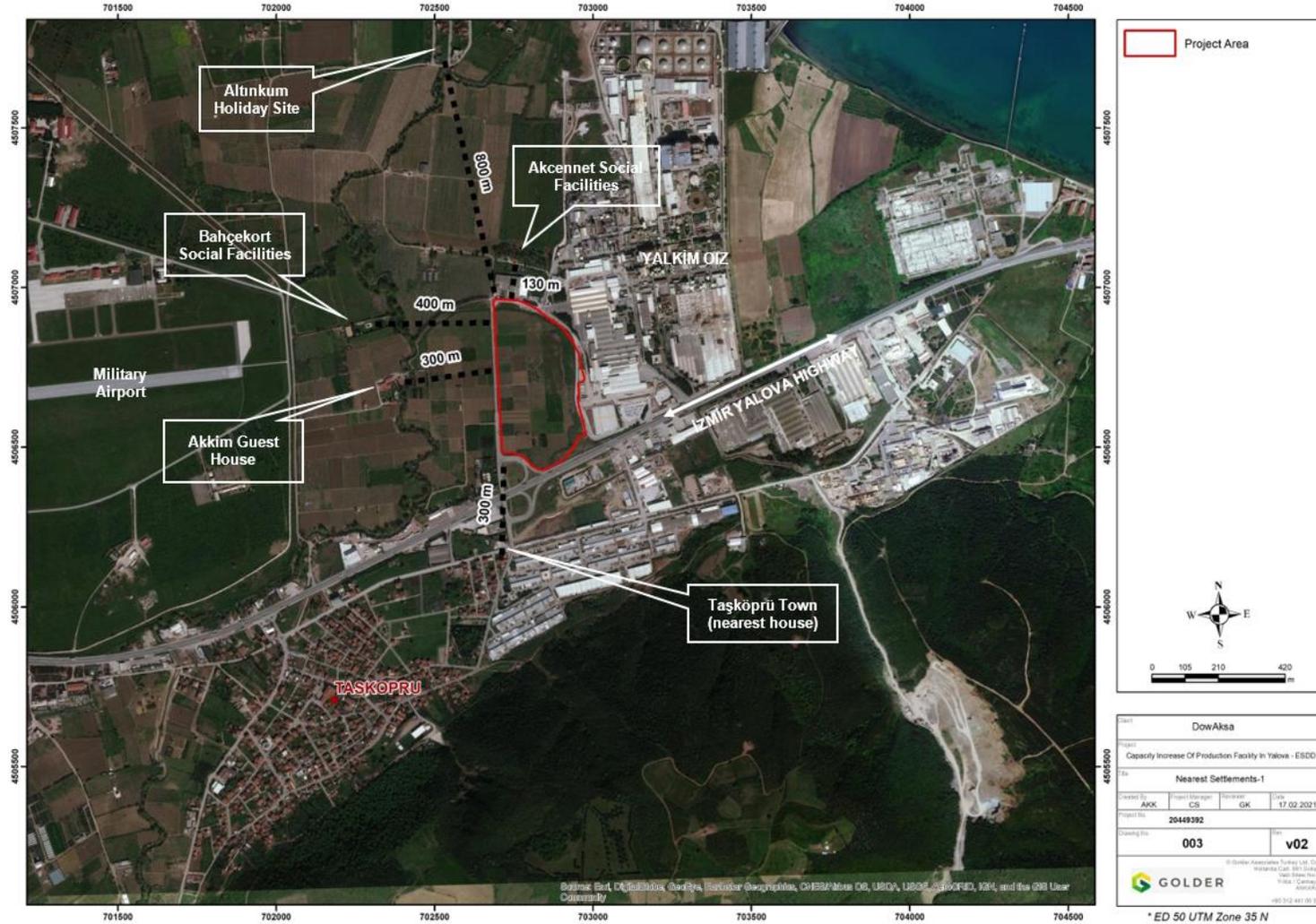


Figure 3: Map Showing Nearest Facilities and the House

Affected neighbourhoods due to being in the area of influence of the Project are determined as Taşköprü Town located approximately 900 m southwest and Kabaklı Village located approximately 2.5 km southeast.

Table 1: Populations of Project Directly Affected Settlements¹

CITY	DISTRICT	NEIGHBOURHOOD	MALE	FEMALE	TOTAL
YALOVA	-	-	138,860	137,190	276,050
YALOVA	ÇİFTLİKKÖY	-	22,408	22,400	55,808
YALOVA	ÇİFTLİKKÖY	TAŞKÖPRÜ	2,127	1,907	4,034
YALOVA	ÇİFTLİKKÖY	KABAKLI	89	81	170

The official EIA processes that have been carried out within the scope of the EIA Regulation until this stage regarding the Project are summarized below.

Table 2: Project Environmental Permitting

Process	Content	Issue Date
Aksa - Carbon Fiber Pilot Production Plant Project (34 tons / year)	“Environmental Impact Assessment Not Required” decision	07.11.2008
Aksa - Carbon Fiber Production Facility Project (1,500 tons / year)	“EIA Positive” decision	05.05.2009
Aksa - Carbon Fiber Production Plant Capacity Increase Project (4,500 tons / year)	“EIA Positive” decision	01.08.2011
Transfer of Aksa Akrilik Kimya Sanayi A.Ş. to Aksa Karbon Elyaf San. A.Ş.	Notification of transfer to authorities	31.01.2012
Transfer of Aksa Karbon Elyaf San. A.Ş. to DowAksa İleri Kompozit Malzemeleri Sanayi Ltd Şti.	Notification of transfer to authorities	31.08.2012
Letter of the Yalova Provincial Directorate of Environment and Urbanization	Notification of “EIA Positive” decision validity	20.12.2013
Carbon Fiber Weaving Plant Project	Out of EIA scope decision	05.03.2014
Fiber Production Plant (10,000 tons / year) Capacity Increase Project	“EIA Positive” Decision	10.10.2014
Changes in product range and displacement of the Polyurethane Pultrusion Unit	No action needed decision	17.06.2016
PAN-based polymer production capacity increase	No action needed decision	09.02.2018
Pultrusion unit capacity increase	Out of EIA scope decision	21.10.2019

¹ Turkish Statistical Institute / Address Based Population Registration System

Process	Content	Issue Date
Carbon Fiber, Pultruded Profile, Carbon Fiber Woven Fabric Production Facility Project	"EIA Positive" Decision	23.01.2023
*Carbon Fiber Capacity Increase Project	"EIA Positive" Decision	26.05.2022

* belongs to the current facility..

Investment is planned to start at the second quarter of 2021 and first and second phases are planned to be completed in 2022 and 2025, respectively. First phase construction works are continuing.

In parallel with the 49-year right of easement granted with the Decree of the Council of Ministers, the operation period of the project is predicted to be 49 years.

3.0 PURPOSE AND SCOPE

The objective of this document is to identify all stakeholders and their interests to the Project, and to lay out the procedures and principles to be applied during engagement with the stakeholders.

The purpose of this Plan is:

- Identifying all stakeholders and their interests to the Project;
- Defining the scope of stakeholder engagement and setting out applicable management interfaces;
- Defining roles and responsibilities;
- Outlining the applicable Project Standards relevant to this Plan;
- Defining Project commitments, and procedures relevant to this Plan; and
- Defining training requirements.

This Plan aims:

- To define the stakeholders;
- To describe the most effective methods by:
 - Keeping the management of operation fully informed on the issues related to external affairs and concerns;
 - Establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns; and
 - Understanding the concerns of stakeholders and establishing fair, transparent and clear dialogue with them based on their concerns.
- To establish long term relations between DowAksa and local communities based on mutual trust and transparency;
- To ensure that stakeholders have access to information on the Project, investments, construction works and operation activities in a timely manner and that disclosed information and data are fully understandable for the targeted groups, and that access to consultation locations is available for all;
- To ensure that vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement processes; and
- To ensure that all relevant parties have been engaged and no group has been excluded.

This Plan is applicable to all activities resulting from the Project, including those of associated facilities and all sub-contractors during construction, operational and closure phases of the Project. All sub-contractors shall work in compliance with the related requirements and standards that have been set out in this Plan, after getting approval by DowAksa.

Golder did not conduct any interviews with stakeholders and mukhtars, face to face meetings, focus group meetings etc. within the scope of this SEP. Information given about previous stakeholder engagement activities are obtained from the EIA Report, Social Baseline and Impact Assessment study conducted in the scope of EIA study and information given by DowAksa representatives.

4.0 PROJECT STANDARDS

All activities and implementations within the scope of the Project shall comply with relevant standards. These are as follows:

- Applicable Turkish Legislation;
- Commitments made to and requirements of, in accordance with relevant laws and regulations, relevant subsidiaries and institutions of the Ministries of the Turkish Republic;
- IFC Performance Standards;
- Equator principles; and
- All policies, standards, directives, plans, lists and standard operating procedures of DowAksa.

4.1 Applicable Turkish Standards

I. THE CONSTITUTION OF THE REPUBLIC OF TURKEY

“The Constitution of the Republic of Turkey” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

II. CIVIL LAW

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

III. LAW ON THE RIGHT TO INFORMATION

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organizations, which qualify as public institutions.

IV. LAW ON THE USE OF RIGHT TO PETITION

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

V. EXPROPRIATION LAW

Another law related to the involvement of stakeholders to the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

VI. NATIONAL REAL ESTATE GENERAL COMMUNIQUÉ

The Ministry of Environment and Urbanisation has published the National Real Estate General Communiqué Sequence No: 400 (“Communique”) on the leasing of Treasury lands for agricultural production purposes in the Official Gazette dated 16 September 2020 and numbered 31246. The Communiqué has introduced new principles and procedures for the leasing of lands under the private ownership of the Treasury or owned by the State for agricultural production purposes by bargaining.

VII. ENVIRONMENTAL LAW

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to Environmental Law, citizens as well as the State bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (25.11.2014, OG No. 29186 latest amended 28.11.2019).

The Projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003, 2008 and finally the last EIA Regulation came into force on November 25th, 2014 and its latest amendment occurred on 28.11.2019.

4.2 Applicable International Standards and Guidelines

International standards to be observed by the Project are the IFC Performance Standards. In particular, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement.

Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties having an effect on, having been affected by, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them;
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it;
- To review this database in consultation with relevant parties;
- To provide necessary information and consultancy services to all stakeholders in order to facilitate their required contributions on the environmental and social issues that may affect them; and
- To continuously protect respectful and constructive relations with stakeholders on the basis of mutual confidence and honesty, and by respecting the values of the stakeholders.

Basic requirements of international standards and guidelines are as follows:

- Description of stakeholders,
- Preparation of a Stakeholder Engagement Plan,
- Provision of necessary information about the Project and operation to the communities that have been affected or potentially to be affected,
- Provision of significant consultancy services by means of early and continuous engagement,
- The grievance and feedback mechanism aiming at concerns, complaints, requests and demands of the stakeholders, in relation with the Project, is planned to be implemented in a timely manner.

The project is categorized as **Category A** in accordance with the Equator Principles and IFC Requirements considering the Project's potential adverse future environmental and/or social risks and impacts are significant but addressed through the mitigation measures.

IFC Performance Standards

The key requirements related to stakeholder engagement from IFC PS 1² are summarized below:

- An Environmental and Social Management System ("ESMS") should be prepared and implemented, and the element of stakeholder engagement should be included.
- The range of stakeholders should be identified, if Affected Communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.

² (International Finance Corporation, 2012)

- A process of effective consultation will be conducted in a manner that allows Affected Communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on Affected Communities exist, an Informed Consultation and Participation (ICP) is to be conducted.
- Indigenous peoples are also to be engaged via the ICP process.

Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007)

IFC defined “Key Concepts and Principles of Stakeholder Engagement” in its A Good Practice Handbook. The building blocks of stakeholder engagement are listed below:

- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders
- Management Functions

5.0 ROLES AND RESPONSIBILITIES

Table 3: Roles and Responsibilities

Roles	Description and Responsibilities
<p>General Manager</p>	<p>The responsibilities of the General Manager are as follows:</p> <ul style="list-style-type: none"> ■ Approval of this Plan and resources required for its implementation; ■ Responsible for preventing the environmental impacts and HS hazards in accordance with the actions of DowAksa; mitigating and eliminating potential social grievances; and providing anything that is necessary and applicable to increase resource efficiency; ■ Determining policies and targets; ■ Ensuring that there are provisions in the sub-contractor engagements about environment, social and HS requirements in order to ensure that the sub-contractor works in accordance with the national legislation and relevant international standards (IFC, etc.) during the construction stage of energy investments and while auditing the performance of the sub-contractors; ■ Increasing the skill and motivation of the personnel; managing the labour force; enhancing working conditions; providing resources for personnel training; and ensuring that performance assessments are being conducted; and ■ To ensure that the quality, environment, HS and resource efficiency documents are prepared and implemented in an effective manner.
<p>Plant Director</p>	<p>Plant Director is responsible for:</p>

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> ■ Determination of the social budget of the project together with General Manager; ■ Report to the General Manager about system performance; ■ To ensure national and international legislations/guidelines which are applicable to the Project activities are identified and tracked; ■ Evaluate the reports provided by Corporate Communications Leader and EHS Team Leader and ensure necessary actions are taken; ■ Review the Grievance Logbook (which includes open and/closed complaints details) every month; ■ Make periodic inspections of the performance of sub-contractors of its operations during the construction phase; ■ Work in cooperation with other departments in order to determine targets for Environmental, Social, HS, and resource efficiency issues; ■ Monitoring the correct and effective implementation of this SEP; ■ Inspecting the effectiveness of the environmental, social and HS documents and applications, and the efficiency and effectiveness of the personnel that are appointed for these issues; ■ Increasing the skill and motivation of the personnel; managing the labour force; enhancing working conditions; providing resources for personnel training; and ensuring that performance assessments are being conducted; ■ Monitoring and helping (when needed) that Corporate Communications Leader and EHS Team Leader are managing the process in the prescribed manner; and ■ Making the final decision concerning internal/external grievances (if needed) in the light of the assessments of Corporate Communications Leader and EHS Team Leader.
<p>Project Construction Team Leader</p>	<p>Corporate Communications Leader is responsible for:</p> <ul style="list-style-type: none"> ■ Keeping the record of the external complaints/suggestions in the Grievance Logbook with details (raised by who, date, status (open, awaiting or closed) etc.); ■ Report to the Plant Director about system performance; ■ Supporting EHS Team Leader on the first evaluation of the relevance of grievances collected; ■ Show best efforts to replied complaints in 10 days and resolve all complaints in one month; ■ Provide regular reporting back to the community on the management related to community grievances (including the type of grievance, how they have been addressed and the resulting outcomes); ■ Record all formal and informal engagement activities with local communities in Stakeholder Management System. This will include

Roles	Description and Responsibilities
	<p>interactions with committees and working groups. These interactions will be summarized in the stakeholder engagement quarterly reports;</p> <ul style="list-style-type: none"> ■ Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports; ■ Monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports; ■ Organize stakeholder meetings to collect the responses to grievances actively as required; ■ Give feedback to the stakeholders about the result of their grievances through External Grievance Form within one month (Complainants, who have provided their names and contact info will be notified within 10 days that the grievance solution process has started and after the grievance closed).
<p>Project Construction Team Leader acting as Human Resources Team Leader</p>	<p>Human Resources Team Leader is responsible for:</p> <ul style="list-style-type: none"> ■ Keeping the record of the internal complaints/suggestions in the Grievance Logbook with details (raised by who, date, status (open, awaiting or closed) etc.); ■ Report to the HR Director/Plant Director about system performance; ■ Supporting EHS Team Leader on the first evaluation of the relevance of grievances collected; ■ Show best efforts to replied complaints in 10 days and resolve all complaints in one month; ■ Keep records of the grievances and types of forms, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports; ■ Monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports; ■ Give feedback to the employees about the result of their grievances through Grievance Action Form within one month (Complainants, who have provided their names and contact info will be notified within 10 days that the grievance solution process has started and after the grievance closed); ■ Ensuring that grievance mechanism process is communicated with all employees (including sub-contractor's employees) during the recruitment process and the first EHS training sessions will also include grievance mechanism process trainings; ■ Ensuring that communication about the grievance mechanism is repeated regularly with the tool-box trainings.

Roles	Description and Responsibilities
<p>Technical Safety & Environment (TSE) Team Leader</p>	<p>The responsibilities of the TSE Team Leader are as follows:</p> <ul style="list-style-type: none"> ■ Determines the national and international legislations that are applicable to the Project activities and informs the Plant Director (and General Manager with the absence of Plant Director); ■ Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures, and measures to eliminate any potential social grievances; ■ Ensures that all provisions in the sub-contractor engagements regarding environment, social and HS requirements, as per the Project Standards, during the construction stage, and to audit the performance of sub-contractors; ■ Determines and provides the necessary training materials for employees; ■ Provides answers to the OHS, environmental and social (especially labour related) grievances raised by employees, the local community and local institutions; ■ Helps Corporate Communications Leader for keeping the record of the complaints/suggestions in the Grievance Logbook with details (raised by who, date, status (open, awaiting or closed) etc.); ■ Supporting CCL on the first evaluation of the relevance of grievances collected; ■ Supporting CCL for recording all formal and informal engagement activities; ■ Monitors relevant legislations; ■ Conducts internal audits / site audits; ■ Determines corrective measures if necessary; ■ Identifies the need for OHS and Environmental trainings; ■ Checks the OHS records and performance reviews of sub-contractors; ■ Checks the Environmental records and performance reviews of sub-contractors; ■ Examines the HSE response plans and preparations; ■ Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained; ■ Implements this plan; and ■ Forms relationships with the Project stakeholders.
<p>Contractors/Subcontractor</p>	<ul style="list-style-type: none"> ■ Contractors/Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence; and ■ They will follow the rules listed in this SEP and other relevant Management System documentation of DowAksa.

6.0 STAKEHOLDER ENGAGEMENT

6.1 Early Engagement

As part of the EIA study, Social Baseline and Impact Assessment study was conducted for the Project. The study includes, the current socio-economic dynamics of the settlements located in the area of influence of the project, potential social impacts of the Project, and the mitigation measures or improvement suggestions for these positive or negative impacts. National legislation (EIA Regulation) and international standard (International Principles for Social Impact Assessment, IAIA) were taken into account in the study. Information about demographic, administrative and economic structure, vulnerable groups, livelihoods, access to infrastructure and services, important problems of the settlements, opinions about the Project are given in the report obtained via desk study, field study and questionnaires (mukhtar and household).

A formal stakeholder engagement meeting (public disclosure meeting) as a requirement of the local EIA A formal stakeholder engagement meeting (public disclosure meeting) as a requirement of the local EIA Regulation was held on during EIA process. The meeting was conducted on 05.11.2020 in Taşköprü Municipality Culture and Sports Center. For the Public Participation Meeting, announcements were made in the affected settlements, and the announcement containing the content, date and time of the meeting was published in national and local newspapers at least 10 days before the meeting date. The meeting was attended by 31 people consisting of participants from Yalova Provincial Directorate of Environment and Urbanization, Yalova Provincial Directorate of Agriculture and Forestry, Taşköprü Municipality, İhlas News Agency, Dowaksa İleri Kompozit Malzemeler San. Ltd. Şti., Çınar Mühendislik Müşavirlik A.Ş. and local people. The meetings comprised of presentation includes the Project information, questions and answers and record of comments and suggestions. The necessary explanations were made during the meeting and in detail in the EIA report. Also, the evaluations regarding the news in the press are included in the EIA Report.

7.0 STAKEHOLDER IDENTIFICATION

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed through secondary research, and involved screening a wide array of potential stakeholders, including institutions, associations, NGOs and other informal groups, that should be involved in the engagement process.

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context.

The relevant stakeholder groups are:

1) External Stakeholders

- Communities
 - Local Communities–Affected settlements,
 - Regional Communities and National Communities;
- Governmental Authorities
 - National governmental bodies
 - Local/ regional governmental bodies,
 - Municipalities and Mukhtar offices
 - Security and emergency forces
- Non-Governmental Organizations – Regional, national and international bodies;
 - Universities and Independent Experts; and

- Media
- Construction Contractors
- Other Interested Parties.

2) Internal Stakeholders

- Employees (including sub-contractors)

A detailed list of stakeholders is provided in Appendix A.

8.0 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an ongoing activity throughout the planning, construction, operation and closure phases of the Project.

DowAksa has the overarching goal of developing sustainable relations with stakeholders through the lifetime of the Project and therefore will continue to engage stakeholders through various activities as detailed in the following Stakeholder Engagement Program.

The SEP and the stakeholder engagement program will be reviewed every six months during construction phase and annually during the operation phase to ensure that they remain valid and meet the needs of DowAksa, the affected communities and other relevant stakeholders and its compliance with international standards.

The detailed stakeholder engagement program is provided in Appendix B.

9.0 TOOLS & METHODS FOR INFORMATION DISCLOSURE

DowAksa will provide transparent informative material in a consistent and timely manner to the affected communities and the remaining stakeholders. This material will be disclosed as discussed in the sections that follow.

9.1 Internet/Web Site

DowAksa will keep information on the Project updated on website of DowAksa. More detailed information about the Projects such as photographs, environmental and social studies, reports etc. will be presented on the website of DowAksa in native language. The homepage of the website can be found here:

- <https://www.dowaksa.com/>

9.2 Information Sheets

Information sheets including a non-technical summary of the Project, key project issues and details regarding DowAksa's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the DowAksa's website, at the entrance of DowAksa's existing facility and at the construction site office. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

9.3 Responding to Local Communities and Publications for People

Authorities of the Project will give full and timely responses to requests, comments and questions of local communities in addition to implementing the grievance procedure in the case of complaints. All requests shall be treated respectfully. In the event it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

At the DowAksa's website, material providing information about different stages of the project will be available, and stakeholders will be kept posted.

When needed, informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities on the basis of impact assessment surveys carried out by company. As long it is appropriate, relevant Project information will be disclosed to the public.

9.4 Disclosure Activities

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities should be widely and proactively publicized, especially among Project affected parties, at least 1 week prior to any meeting via website announcements, through mukhtars, local newspaper advertisement, posted information banner in mukhtars' offices;
- The non-technical summary of the Project should be accessible (via website) prior to any event to ensure that people are informed in advance of the meeting related to Project activities;
- The location and timing of any meetings will be designed to maximize accessibility to Project affected stakeholders, if needed transportation arrangement will be made by DowAksa to increase participation in meetings;
- The information presented (via presentations, leaflets, website publications etc.) will be clear and non-technical and will be presented in the local language understood by those in the communities;
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and DowAksa will encourage the stakeholders to raise their concerns/complaints and suggestions; and
- Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up on, the person who raised the issue will be informed after the meeting when the issues resolved.

Project related information communication meetings will be open to the public and will be announced through local media. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women.

DowAksa will inform the public, via newspapers, meetings, media and other similar means, about how people can access Project related documents (such as this SEP and NTS) and the project timetable, and how they can submit comments regarding said documents. Contact details for the DowAksa are presented in Section 10.3.

10.0 MANAGEMENT OF GRIEVANCES

10.1 Grievance Mechanism Procedure

Grievance Mechanism Procedure consists of two parts; these are External Stakeholders (the list of external stakeholders presented in Appendix A) and Internal Stakeholders (DowAksa employees, subcontractors, suppliers). The Complaint Officer of external grievance mechanism will be the Corporate Communications Leader and the internal grievance mechanism will be HR Team Leader. They will receive support from the EHS Team Leader in making an initial assessment of the relevance of the complaints collected.

Grievance Mechanism Procedure covers the below listed items:

- Purpose and Scope
- Submission of complaints
- Registration of complaints

- Responding to complaints
- Filing/archiving complaints
- Grievance collection boxes
- Announcement of the Grievance Mechanism
- Key Performance Indicators

All internal and external complaints will be shared in writing with the “Complaint Form” presented in Appendix-C. This form is filled out directly by the complainant or by the company authorised person (Corporate Communications Leader or HR Team Leader) under the direction of the complainant.

The "Complaint Reason", "Action Taken for the Complaint", "Action Tracking Activities", "Date", "Title / Signature" sections of the Complaint Registration / Closure Form presented in Appendix-D will be filled by the department concerned and it will be forwarded to the relevant Leader. The tracking of the complaint will be done by the Corporate Communications Leader for external grievances or HR Team Leader for internal grievances.

The first feedback will be given within 10 calendar days and stakeholders will be informed about the results of their complaints within 30 calendar days. If a complainant is not satisfied with the response received, he/she can complain again. In cases where the complainant is not satisfied with the way his / her complaint is answered or solved, the Company will invite representatives of the relevant local community to participate in the process, thereby establishing a mutually agreed solution. The “complaint registration/closure form” is also used to record the completion of the grievance by getting the signature of the complainant if he/she is satisfied with the solution.

All internal and external complaints will be recorded in the grievance logbook presented in Appendix E. The status of the complaint such as, open, closed or action taken will be tracked from this logbook.

The grievance mechanism includes both internal and external stakeholders and also refers to anonymous grievances. Complaint / suggestion boxes will be made available in the mukhtars offices of the nearest settlements, at the entrance of existing DowAksa Facility and at points at the construction site.

Stakeholders will be informed about the locations of the grievance / suggestion boxes and how they will communicate their complaints (via the website or grievance / suggestion boxes).

10.2 Grievance Mechanism Communication

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharts in local places.

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including sub-contractor’s employees) during the recruitment process and the first EHS training sessions will also include the stakeholder engagement and grievance mechanism process trainings;
- Communication about the grievance mechanism will be repeated regularly with the tool-box trainings;
- The grievance/suggestion boxes will be made available at the construction site offices for internal grievances; and
- All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

For the collection of external grievances from community:



- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion boxes);
- The grievance/suggestion boxes will be made available at the entrance of the existing DowAksa Facility; Complaint Form will be available in DowAksa³ web site
- Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

10.3 Contact Details of DowAksa

Contact Detail
<p>DowAksa İleri Kompozit Malzemeleri San. Ltd. Şti. Merkez Mahallesi Akasya 2 Sokak No:3/1 Taşköprü-Çiftlikköy Telephone: +90 212 251 45 00 Fax: +90 (212) 249 35 99 E-Mail: irem.cavusoglu@dowaksa.com deniz.mutlu@dowaksa.com</p>

11.0 MONITORING

11.1 Key Monitoring Activities

DowAksa will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health and safety (labour rights) and social performance of the Project mainly through:

- Revision, improvement or extension of the monitoring activities, parameters, locations and frequency; and
- Reviews and revisions of the management plans and procedures.

DowAksa will monitor the effectiveness of the engagement processes by analysing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and
- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are shown in Table 4.

³ <https://www.dowaksa.com/>

Table 4: Key Monitoring Measures

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
SEP-01a	Community Grievances	Corporate Communications Leader and EHS Team Leader will keep the record of the complaints/suggestions in the Grievance Logbook with details (raised by who, the date, status (open or closed) etc.).	Corporate Communications Leader EHS Team Leader	Continuously
SEP-01b	Community Grievances	Plant Director will review the Grievance Logbook (which includes open and/closed complaints details) every month.	Plant Director	Every month
SEP-02a	Feedback to local communities	Corporate Communications Leader and as necessary the EHS Team Leader work together to provide regular reporting back to the community on the management related to community grievances (including the type of grievance, how they have been addressed and the resulting outcomes).	Corporate Communications Leader EHS Team Leader	Continuously
SEP-02b	Feedback to local communities	DowAksa will ensure that an internal audit will be conducted related to grievance process in every 6 months by Plant Director or designated other responsible (like internal auditors in the company or external third-party companies).	DowAksa	Every 6 months
SEP-03a	Community engagement activities	Corporate Communications Leader with the help of EHS Team Leader will record all formal and informal engagement activities with local communities in Stakeholder Management System. This will include interactions with committees and working groups. These interactions will be summarized in the stakeholder engagement quarterly reports.	Corporate Communications Leader EHS Team Leader	Reporting-quarterly (construction), bi-annually (operation)
SEP-03b	Community engagement activities	DowAksa will ensure that an internal audit will be conducted related to stakeholder engagement process in every 6 months (bi-annually) by Plant Director or designated other responsible (like internal auditors in the company or external third-party companies).	DowAksa	Every 6 months

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
SEP-04	Disclosure materials disseminated	Corporate Communications Leader with the help of EHS Team Leader will keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports.	Corporate Communications Leader EHS Team Leader	Reporting-quarterly (construction), bi-annually (operation)
SEP-05	Social Responsibility Program	Corporate Communications Leader and HR Team Leader will monitor and record the social responsibility activities carried out in the scope of the Project and these records will be inserted to stakeholder engagement quarterly reports.	Corporate Communications Leader HR Team Leader	Reporting-quarterly (construction), bi-annually (operation)
SEP-06	Employee welfare	HR Team Leader will monitor and record the activities carried out in the scope of the Project for the workers such as face to face interviews, trainings, social events and these records will be inserted to stakeholder engagement quarterly reports.	HR Team Leader	Reporting-quarterly (construction), bi-annually (operation)

11.2 Key Performance Indicators

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 5: Key Performance Indicators

ID	KPI	Target	Monitoring Measures
SEP-KPI-01	Number of community and employee grievances	Total number reduced year on year	Grievance Logbook
SEP-KPI-02	Number of grievances replied within 10 days	Target of 100%	Grievance Logbook
SEP-KPI-03	Reporting back to stakeholders on the implementation of the Grievance Mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
SEP-KPI-04	Internal auditing the Grievance Mechanism to ensure that it is being implemented and that grievances are being adequately addressed.	Bi-annual (construction), annual (operation) audit complete Target of 100% of grievances replied within 10 days and closed out to satisfaction of	Audit Report

ID	KPI	Target	Monitoring Measures
	Auditing the stakeholder engagement process	complainant within one month	

12.0 TRAINING

All necessary trainings will be provided as part of induction training for all employees of the Project and its contractors (to provide general awareness) and specific training on stakeholder engagement and the application of the Grievance Mechanism will be provided to Corporate Communications Team, HR Team and other personnel and supervisors of DowAksa and contractors involved in or overseeing activities with local communities.

13.0 AUDIT AND REPORTING

Internally, conformance of this SEP will be monitored in accordance with the requirements of the DowAksa.

Contractors/sub-contractors will be subject to inspection and audit in accordance with the requirements of the DowAksa.

Compliance with this plan will be subject to periodic assessment by DowAksa internal corporate audit and assurance programs and separately by Project Lenders.

13.1 Record Keeping

Records will be kept on the following subjects:

- 1) Consultation meetings.
- 2) Stakeholder engagement activities.
- 3) Grievances raised and actions taken to close them.
- 4) Opinions/suggestions/comments provided by the community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism).
- 5) Press releases and interviews.
- 6) Records of audits, inspections and incidents.



This page intentionally left blank

APPENDIX A

**DETAILED STAKEHOLDER
LIST**

Table 6: Detailed Stakeholder List

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Land Occupiers (land users)		√	Local Communities	Local residents
Taşköprü Town		√	Local Communities	Local residents
Holiday Site (Altinkum) and Housing Cooperative (Elmakent, Aydınkent and Ceylankent coastal site)		√	Local Communities	Local residents
Kabaklı Village		√	Local Communities	Local residents
YALKİM Organized Industrial Zone		√	Local Commercial Facilities	Local residents
Çiftlikköy District - Yalova		√	Local Communities	Local residents
Yalova Province		√	Regional Communities	Regional residents
Employees of the Project	√		Employees	Employees of DowAksa and employees of contractors of the Project.
Yalova Provincial Police Department		√	Local/ regional governmental bodies	Security

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Governorship of Yalova		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Taşköprü District Governor		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Taşköprü Municipality		√	Municipalities	Permitting Development plans; public services, public aids (providing work machine, waste disposal, public education services, etc.) Construction, repair and extension of transportation routes; environmental planning; interventions against landslide and land changes; social services and assistance; zoning works, water, sewage, solid waste, environment and emergency aid; and issues related to forest villages.
Yalova Municipality		√	Municipalities	Permitting Development plans; public services, public aids (providing work machine, waste disposal, public education services, etc.) Construction, repair and extension of transportation routes; environmental planning; interventions against landslide and

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
				land changes; social services and assistance; zoning works, water, sewage, solid waste, environment and emergency aid; and issues related to forest villages.
Yalova Provincial Directorate of Environment and Urbanization		√	Local/ regional governmental bodies	Permitting Development plan related issues, grievances related to environment, environmental auditing. Consultations on natural assets within the area.
Yalova Provincial Directorate of Agriculture and Forestry		√	Local/ regional governmental bodies	Permitting Decisions and permits related to agricultural areas; conservation and development of animal stockbreeding and range.
Yalova Provincial Directorate of Health		√	Local/ regional governmental bodies	Prevention of the spread of communicable diseases; vector struggle; measures for the protection of public health.
Yalova Provincial Directorate of Social Security		√	Local/ regional governmental bodies	Permitting Social security and insurance of workers, employment and dismissal notices.
Yalova Provincial Directorate of Culture and Tourism		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Kocaeli Regional Directorates of the Preservation of Cultural Assets		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Yalova Museum Directorate		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Yalova Provincial General Congress		√	Local/ regional governmental bodies	Generates local legislation.
Yalova Governorship Provincial Directorate of Disaster and Emergency		√	Local/ regional governmental bodies	Manages the provincial disaster and emergency management center.
State Hydraulic Works (“DSİ”) 1 st Regional Directorate		√	Local/ regional governmental bodies	Head of the 1 st DSİ Branch
General Directorate of Nature Conservation and National Parks		√	National governmental bodies	Policy maker Conservation of Nature
Ministry of Environment and Urbanization		√	National governmental bodies	Policy maker Development plan related issues, grievances related to environment, environmental auditing.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Ministry of Agriculture and Forestry		√	National governmental bodies	Policy maker Right of use of land, forestry permits, and grievances related to forestry and water sources, forestry and water source auditing.
Ministry of Energy and Natural Resources		√	National governmental bodies	Policy maker: Natural resources
Ministry of Industry and Technology		√	National governmental bodies	Policy maker: Regulate science, industry and technology.
Ministry of Treasure and Finance		√	National governmental bodies	Policy maker
Ministry of Trade		√	National governmental bodies	Policy maker
Ministry of Health		√	National governmental bodies	Policy maker: Prevention of the spread of communicable diseases; vector struggle; measures for the protection of public health.
Ministry of Family, Labour and Social Affairs		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
General Directorate of Occupational Health and Safety		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.
Turkish Employment Agency General Directorate		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.
General Directorate of National Real Estate		√	National governmental bodies	Policy maker: Acquisition, management and disposal of state-owned real estates, meeting public needs by making the necessary determinations for the efficient use of Treasury immovables, generating income or converting them into economic value, following the change and development in national and international markets and determining the necessary policies.
Contractors/sub-contractors	√		Contractors/sub-contractors	Implementation of Project ESMS
Greenpeace		√	NGO	NGO
UNESCO		√	NGO	NGO
TEMA Yalova Branch		√	NGO	NGO

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
DOĞÇEV Association		√	NGO	NGO
Doğa Association		√	NGO	NGO
Nature Conservation Centre ("DKM")		√	NGO	NGO
Yalova Çevre Platformu		√	NGO	NGO
Kocaeli University		√	NGO	NGO
Union of Chambers of Turkish Engineers and Architects		√	NGO	NGO
Chamber of Environmental Engineers		√	NGO	NGO
Yalova Chamber of Commerce and Industry		√	NGO	NGO
Yalova Association of Industrialists and Businessmen		√	NGO	NGO
Yalova Newspaper		√	Media	Information Disclosure
Dünya Newspaper		√	Media	Information Disclosure

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Haberçi Newspaper		√	Media	Information Disclosure
Yalova Hayat Newspaper		√	Media	Information Disclosure
Manşet Newspaper		√	Media	Information Disclosure
Yalova Çevre Newspaper		√	Media	Information Disclosure
Çiftlikköy Newspaper		√	Media	Information Disclosure
Gözde Fm Radio Channel		√	Media	Information Disclosure
Radyo Çınar Radio Channel		√	Media	Information Disclosure





STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities	Project information on design, schedule, environmental and social impacts of the project construction, commissioning and operation.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Information sharing; ■ Objective and structure of investment and ongoing construction activities; ■ Production and environmental technology selected, and operational precautions taken; ■ Early notification on Construction end date. ■ Information provision on traffic routes and schedules ■ Training on traffic safety 	<ol style="list-style-type: none"> 1. NTS 2. Annual reports 3. Contact group/ Community meetings 4. Media 5. Traffic Management Plan/Contact group/ Community meetings 6. Training 	<ol style="list-style-type: none"> 1. Prior to Construction, reviewed for updates every year 2. Annual/As required 3. As required 4. As required 5. As required 6. As required 	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Scheduling for commissioning activities and potential impacts on health and safety measures/mechanisms; and ■ Mitigation measures (if any) against environmental and social impacts. 	<ol style="list-style-type: none"> 1. NTS 2. Annual reports 3. Contact group/ Community meetings 4. Media 	<ol style="list-style-type: none"> 1. Prior to the operation phase, reviewed for updates every 2 years 2. Annual/As required 3. As required 4. As required 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities	Project information on land use impacts	Construction	Provision of information on: <ul style="list-style-type: none"> Discuss restrictions in areas that may be required for construction activities to ensure that livelihoods are not adversely affected. 	<ol style="list-style-type: none"> NTS Annual reports Contact group/ Community meetings Media 	<ol style="list-style-type: none"> Prior to Construction, reviewed for updates every year Annual/As required As required As required 	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> Discuss restrictions in areas that may be required for operation activities to ensure that livelihoods are not adversely affected.; and Update land users on Project activities, and the governmental permitting process which includes the treasury land grant (if needed). 	<ol style="list-style-type: none"> NTS Annual reports Contact group/ Community meetings Media 	<ol style="list-style-type: none"> Prior to the operation phase, reviewed for updates 2 years Annual/As required As required As required 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities	Recruitment and Procurement Strategies of the Project	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; and ■ Procurement of supplies and services. 	<ol style="list-style-type: none"> 1. Information leaflets (on policies and strategies) 2. During Stakeholder Engagement Meetings 3. Meetings with local Mukhtar 4. Media 	<ol style="list-style-type: none"> 1. As required 2. Prior to the construction phase, as required 3. As required 4. As required 	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; and ■ Procurement of supplies and services. 	<ol style="list-style-type: none"> 1. Information leaflets (on policies and strategies) 2. During Stakeholder Engagement Meetings 3. Meetings with local Mukhtars 4. Media 	<ol style="list-style-type: none"> 1. As required 2. Prior to the operation phase, as required 3. As required 4. As required 	DowAksa



DOWAKSA



Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities	Procedures on how to submit comments to and raise grievances regarding the Project Procedures of the Project on responding to community comments and grievances	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Grievance Mechanism Procedure; ■ Grievance Resolution Process (including in response to contractor issues); ■ Periodic monitoring of contract implementation with communities; and ■ Monitoring of the determined resolution measures. 	1. Review of grievance register 2. Meetings with local Mukhtars 3. Community meetings	1. Every month 2. and 3. As required	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Grievance Mechanism Procedure; ■ Grievance Resolution Process (including in response to contractor issues); ■ Periodic monitoring of contract implementation with communities; and ■ Monitoring of the determined resolution measures. 	1. Review of grievance register 2. Meetings with local Mukhtars 3. Community meetings	1. Every month 2,3. As required	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities Local/ Regional governmental bodies and NGOs	The design and implementation of Social Responsibility Project(s)	Construction	<p>Provision of information on Social Responsibility Project(s) for the:</p> <ul style="list-style-type: none"> ■ Identification and prioritization of community needs; ■ Assessment of available and required resources; ■ Formation of partnerships with government and community groups for development and implementation of Social Responsibility Project(s) in partnership with key stakeholders; and ■ Promotion of positive interactions between the Project workforce and public services (e.g. sport, recreation, worship, or other activities). 	<ol style="list-style-type: none"> 1. Workshops 2. Surveys 3. Community Meetings 4. Meetings with NGOs 5. Media 	1,2,3, 4, and 5. As required	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	<p>Provision of information on Social Responsibility Project(s) for the:</p> <ul style="list-style-type: none"> ■ Identification and prioritization of community needs; ■ Assessment of available and required resources; ■ Formation of partnerships with government and community groups for development and implementation of Social Responsibility Project(s) in partnership with key stakeholders; and ■ Promotion of positive interactions between the Project workforce and public services (e.g. sport, recreation, worship, or other activities). 	<ol style="list-style-type: none"> 1. Workshops 2. Surveys 3. Community Meetings 4. Meetings with NGOs 5. Media 	1,2,3, 4 and 5. As required	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities & NGOs, Local/ regional governmental bodies (specifically, heads of emergency services)	Use of Emergency Response and Preparedness in the Project	Construction	<p>Provision of information on code compliance / emergency preparedness to:</p> <ul style="list-style-type: none"> Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders. 	<ol style="list-style-type: none"> Drills Workshops Community Meetings 	<ol style="list-style-type: none"> Annual drills or as required. As required As required 	DowAksa
		Operation	<p>Provision of information on code compliance / emergency preparedness to:</p> <ul style="list-style-type: none"> Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	<ol style="list-style-type: none"> Drills Workshops Community Meetings 	<ol style="list-style-type: none"> Annual drills or as required. 2-3. As required 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities Construction contractors Employees	Management of risks on the biodiversity components by the Project.	Construction	<p>Provision of information on biodiversity management to:</p> <ul style="list-style-type: none"> ■ Discuss topsoil management issues, related to the protection and enhancement of vegetation; ■ Discuss roadkill prevention, and implementation of speed limits and training of workers and local land users; and ■ Training employees and contractors for the Project the approach of not disturbing fauna within the Project Area. 	<ol style="list-style-type: none"> 1. Workshops 2. Individual and Community meetings 3. Focus group discussions 4. Meetings with relevant NGOs 	<p>1, 4. As required to support offset planning</p> <p>2,3. As required</p>	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	<p>Provision of information on biodiversity management to:</p> <ul style="list-style-type: none"> ■ Discuss landscape management issues, related to the protection and enhancement of vegetation; ■ Discuss roadkill prevention, and implementation of speed limits and training of workers and local land users; ■ Training employees and contractors for the Project the approach of not disturbing fauna within the Project Area;; ■ Understand and respond to their concerns/suggestions about the Project. 	<ol style="list-style-type: none"> 1. Workshops 2. Individual and community meetings 3. Focus group discussions 4. Meetings with relevant NGOs 	<p>1, 4. As required to support offset planning</p> <p>2, 3. As required</p>	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Non-governmental organizations (NGOs)	Social progress, economic and social development, and environmental protection.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Mitigation measures against potential environmental and social risks; ■ Sustainability criteria; and ■ Social responsibility projects implementation principles. 	<ol style="list-style-type: none"> 1. Focus Group meetings 2. Workshops 3. Company website 4. Surveys 	<ol style="list-style-type: none"> 1. As required/As requested 2, 3, 4. As required 	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Mitigation measures against potential environmental and social risks; ■ Sustainability criteria; and ■ Cumulative impacts of projects in the region. 	<ol style="list-style-type: none"> 1. Focus Group meetings 2. Workshops 3. Company website 4. Surveys 	<ol style="list-style-type: none"> 1. As required/ as requested 2, 3, 4. As required 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Municipalities Yalkim OIZ and Mukhtar offices	Management of environmental and social risks of the Project.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Local employment; ■ The environmental monitoring program; ■ Environmental monitoring results; ■ Overall information about progress of the Project; and ■ Support in reaching vulnerable groups. 	<ol style="list-style-type: none"> 1. Planned Meetings (with Mukhtars) 2. Brochures 3. Workshops 	<ol style="list-style-type: none"> 1. As required 2, 3. As required/ as requested 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Local employment; ■ The environmental monitoring program; ■ Environmental monitoring results; ■ Overall information about progress of the Project; ■ Support in reaching vulnerable groups; and ■ Cumulative impacts of projects in the region. 	<ol style="list-style-type: none"> 1. Planned Meetings (with Mukhtars) 2. Brochures 3. Workshops 	<ol style="list-style-type: none"> 1. As required 2, 3. As required/ as requested 	DowAksa
Governmental Authorities	Project activities and schedule. Management of environmental and social	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Project activities and schedule; and ■ Management and monitoring plans for social issues, environment and health. 	<ol style="list-style-type: none"> 1. Meetings with governmental institutions 	<ol style="list-style-type: none"> 1. As required 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
	risks by the Project.	Operation	Provision of information on: <ul style="list-style-type: none"> ■ Project activities and schedule; ■ Management and monitoring plans for social issues, environment and health; and ■ Cumulative impacts of projects in the region. 	1. Meetings with governmental institutions	1. As required	DowAksa
Media	Project activities. Management of environmental and social risks generated by the Project.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Transparent communication connection and positive reaction of printed and visual media. 	1. Press releases 2. Interviews with the media	1. and 2. As required.	DowAksa
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Transparent communication connection and positive reaction of printed and visual media. 	1. Press releases 2. Interviews with the media	1. and 2. As required.	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Vulnerable Groups	Project activities, Management of environmental and social risks by the Project, Grievance mechanism, Employment and any other interest of vulnerable groups.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; ■ Training of staff; ■ Procurement of supplies and services; ■ Use of roads, water and other infrastructure, increase in traffic density; ■ Local employment; ■ Important commercial opportunities; and ■ Environmental impacts. 	<ol style="list-style-type: none"> 1. Planned meetings targeting any identified vulnerable groups 2. Women only meetings 3. Workshops 4. Individual and community meetings 5. Focus group discussions 6. NTS 	<ol style="list-style-type: none"> 1-2. As requested, 3-5. When required 6. At the beginning of the construction phase 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	<p>Provision of information on:</p> <ul style="list-style-type: none"> ■ Recruitment of employees; ■ Training of staff; ■ Procurement of supplies and services; ■ Use of roads, water and other infrastructure, increase in traffic density; ■ Local employment; ■ Important commercial opportunities; and ■ Environmental impacts 	<ol style="list-style-type: none"> 1. Planned meetings targeting any identified vulnerable groups 2. Women only meetings 3. Workshops 4. Individual and community meetings 5. Focus group discussions 6. NTS 	<ol style="list-style-type: none"> 1-2. As requested, 3-5. When required 6. At the beginning of the operation phase 	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
DowAksa employees	Employee welfare	Construction	Provision of information on: ■ Employee Mechanism; ■ Labour rights; and ■ OHS procedures.	Grievance 1. Bulletin 2. Face-to-face interviews 3. OHS Committee 4. Trainings 5. Company social events for employees 6. Employee grievance mechanism	1-5. As required 6. When required due to the grievance mechanism	DowAksa
		Operation	Provision of information on: ■ Employee Mechanism; ■ Labour rights; and ■ OHS procedures.	Grievance 1. Bulletin 2. Face-to-face interviews 3. OHS Committee 4. Trainings 5. Company social events for employees 6. Employee grievance mechanism	1-5. As required 6. When required due to the grievance mechanism	DowAksa

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
DowAksa Sub-contractor employees	Employee welfare	Construction	Provision of information on: ■ Employee Grievance Mechanism; ■ Labour rights; ■ OHS procedures; and ■ Contractor management.	1. Bulletin 2. Face-to-face interview 3. OHS Committee 4. Labour audits/reviews	1-4. Monthly, or when determined to be necessary due to the results of the grievance mechanism.	DowAksa
		Operation	Provision of information on: ■ Employee Grievance Mechanism; ■ Labour rights; ■ OHS procedures; and ■ Contractor management.	1. Bulletin 2. Face-to-face interview 3. OHS Committee 4. Labour audits/reviews	1-4. Monthly, or when determined to be necessary due to the results of the grievance mechanism.	DowAksa



APPENDIX C

COMPLAINT FORM

COMPLAINT FORM

ŞİKAYET KAYIT FORMU		
1.	Şikayet Kayıt Numarası	
2.	Tarih/...../202.....
Şikayet/ Sahibi Hakkında Bilgiler: <i>Şikayet/Talep Sahibi şikayetinin gizli olmasını istiyorsa bu bölüm boş bırakılmalı, şikayet sahibine bu durumda şikayet/talep çözümü ile ilgili kendisine geri dönüş yapılamayacağı hakkında bilgi verilmelidir.</i>		
3.	İsim	
	Soyisim	
	Organizasyon (çalışan ise çalıştığı bölüm/birim)	
	İletişim Bilgileri	Telefon Numarası:
E-mail Adresi (Eğer varsa):		
Adres:		
4.	Şikayetin konusu ve ne zaman gerçekleştiğini de içeren tanımı	
5.	Şikayetin Ortadan Kalkması İçin Öneriler	
6.	Şikayetçinin imzası	
7.	Şikayeti kayıt altına alan proje görevlisi:	İsim Soyisim:
		Görevi:



APPENDIX D

COMPLAINT REGISTRATION/CLOSURE FORM

COMPLAINT REGISTRATION/CLOSURE FORM

ŞİKÂyet KAYIT FORMU					
Şikâyet Numarası:					
KALİTE, SÜREÇ YÖNETİMİ VE ÇEVRE UZMANI TARAFINDAN DOLDURULACAKTIR.	Şikâyet Sahibinin Adı, Soyadı :				
	Adres :				
	Semt / Şehir :				
	Posta Kodu :		Telefon :		
	Şikâyet İletim Şekli :		Mektup / Fax / E-mail		Telefon yoluyla
	Şikâyet İletim Tarihi :		Şikâyet Yetkilisi İmzası :		
	Şikâyetin Aciliyet Durumu :		Acil	<input type="checkbox"/>	Acil Değil
ŞİKAYETLE İLGİLİ DEPARTMANLAR TARAFINDAN DOLDURULACAKTIR.	Şikâyet Nedeni :				
	Şikâyet için Alınan Aksiyon :				
	Tazminat/Ödeme gerekli mi?	EVET	<input type="checkbox"/>	HAYIR	<input type="checkbox"/>
	Alınan İzleme Faaliyetleri :				
	Tarih :	Unvan / İmza :			
KALİTE, SÜREÇ YÖNETİMİ VE ÇEVRE UZMANI TARAFINDAN DOLDURULACAKTIR.	Şikâyetçi şahsa cevap verildi mi?	EVET	<input type="checkbox"/>	HAYIR	<input type="checkbox"/>
	Şikâyet Sahibinin İmzası				
	Şikâyet Cevabı İletim Şekli (Posta/Fax/Email/Telefon) :				
	Şikâyet Cevap Tarihi:	Şikâyet Yetkilisi İmzası:			



APPENDIX E

GRIEVANCE LOGBOOK

