



PETLAS TIRE INDUSTRY AND TRADE INC.
Operational Capital Investment Project

Stakeholder Engagement Plan (SEP)
(Plan No: PTL-PLN-SOC-SEP-001)

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Abbreviations

AIIB	Asian Infrastructure and Investment Bank
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
HS	Health and Safety
IFC	International Finance Corporation
İŞKUR	Turkish Employment Agency
Petlas	Petlas Lastik Sanayi ve Ticaret A.Ş./ Petlas Tire Industry and Trade Inc.
KOSB	Kırşehir Organized Industrial Zone
KPI	Key Performance Indicator
km	kilometer
MGS	MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. / MGS Project Consultancy Engineering Trade Limited Co.
m²	meter square
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
Project Company	Petlas Lastik Sanayi ve Ticaret A.Ş./ Petlas Tire Industry and Trade Inc.
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff
TKYB	Türkiye Kalkınma ve Yatırım Bankası A.Ş./ Development and Investment Bank of Turkey
The Project	Petlas Operational Capital Investment Project

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) is prepared within the scope of Petlas Operational Capital Investment Project. This SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according to the National Environmental Legislation, TKYB Environmental and Social Policy, International Finance Corporation (IFC) Performance Standards (PSs) and Asian Infrastructure and Investment Bank (AIIB) Environmental and Social Standards (ESSs).

1.1 Background and Project Description

PETLAS was established in 1976 as a Public Economic Enterprise to meet the tire needs of the Air Force Command, in line with the public awareness of "Meeting Our Defense Industry Needs from Domestic Resources" due to the problems encountered in the supply of tires to warplanes. The factory, the foundation of which was laid in 1977, started trial production after a long investment period of 12 years and the first products were put on the market in 1990. Petlas was sold to Kombassan in 1997 and continued its activities under Kombassan Holding until April 2005. Petlas was purchased in April 2005 by Abdülkadir Özcan Inc., which is Turkey's leading company in the field of marketing, sales and logistics in the tire industry and has been operating in the tire industry for many years.

The existing facility is located on the Kırşehir-Kayseri highway in Gölhisar, 7 km from Kırşehir, on a total land of 2,000,000 m² and has a closed area of 400,000 m². The location of the project area is given below in Figure 1.1.



Figure 1.1. Location of the plant

The facility is 3 km away from Kırşehir Organized Industrial Zone, but it is located in the boundaries of the Organized Industrial Zone.

The distances of the nearest settlements to the plant are given in Table 1.1 and represented in Figure 1.2 below.. .



Figure 1.2. Nearest Settlements

The nearest settlements are given in Table 1.1.

Table 1.1. Distances to the Nearest Settlements and Populations

Settlement	Distance to the License Area (km)	Direction	Population		
			Male	Female	Total
Gölhisar Neighborhood	<1km	South	362	387	749

1.2 Scope

This Stakeholder Engagement Plan is applicable to all activities of the Project, including contractors. All Contractors shall work in compliance with the relevant requirements and standards that have been set out in this Plan.

This plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. The plan should be updated periodically as stakeholder communication needs change.

This plan is a part of the management plans developed for the Project. This Plan has overlaps and cross-linkages to Grievance Mechanism Procedure (GMP) (PTL-PRC-SOC-GMP-001) which is applied to all internal direct and indirect workers, customers, and external stakeholders, and the Environmental and Social Management Plan with the reference number of PTL-PLN-HSE-ESMP-001 particularly concerning the contractor's activities.

1.3 Purpose

The purpose of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders.

The purpose of this Plan is to:

- identify all possible stakeholders and their interests to the plant,
- set out applicable management interfaces,
- define roles and responsibilities regarding stakeholder engagement,
- outline the applicable project standards relevant to this plan,
- define project commitments and procedures relevant to this plan,
- define monitoring requirements of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,
- outline alternative communication tools in case of pandemic situations.

This Plan also aims to create long-term relations between the project company and local communities based on mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and engagement process to ensure that all relevant parties have been engaged are considered. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

The other purposes of this SEP are 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 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 dialog with them based on their concerns.

1.4 Definitions

Project Affected People (PAP): Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Stakeholder: All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Internal Stakeholders: Groups or individuals within a business who work directly within the business, such as employees and contractors.

External Stakeholders: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

Vulnerable People: People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Grievance: An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner.

Complaint: A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.

Grievance Mechanism: A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.

1.5 Key Principles

During the implementation of this Plan, following principles will be followed to achieve an effective stakeholder engagement.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.

2 ROLES AND RESPONSIBILITIES

The roles and their responsibilities are defined below in Table 2.1 for implementation of this SEP.

Table 2.1. Roles and Responsibilities

Roles	Responsibilities
Board of Manager	<ul style="list-style-type: none"> ➤ Ensures this SEP will be implemented during the lifetime of the Project, ➤ Determines the policies and targets regarding the social communication and stakeholder engagement, ➤ Appoints the General Manager and ensures the General Manager is aware of his / her responsibilities, ➤ Evaluates the reports provided by General Manager and ensures necessary actions were taken, ➤ Provides necessary resources for proper implementation of this SEP and GMP.

Roles	Responsibilities
General Manager	<ul style="list-style-type: none"> ➤ Coordinates with parties for proper implementation of this SEP, ➤ Providing necessary resources for the implementation of the grievance mechanism procedure, ➤ Makes periodic inspections of the performance of contractors of its operations during the installation phase, ➤ Reports to the Board of Manager about performance of the system, ➤ Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked, ➤ Works in cooperation with other departments to determine targets for Environmental, Social and HS and resource efficiency issues.
Social Responsibility Staff (SRS) (Human Resources and Industrial Relations Manager)	<ul style="list-style-type: none"> ➤ Records all formal and informal engagement activities with local communities in stakeholder management system, ➤ Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports, ➤ Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, ➤ Forms relationships with the Project stakeholders, ➤ Organizes stakeholder meetings to collect the responses to grievances actively as required, ➤ Provides regular reporting back to the community on the management related to community grievances, ➤ Determines and provides the necessary training materials for employees, ➤ Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.), ➤ Shows best efforts to resolve all complaints in one month, ➤ Searches the causes of the grievance and the social incidents that cause, injuries, delays or stoppage in the work and disputes among the Project and communities, ➤ Monitors all complaints and ensures that all complaints are resolved and closed, ➤ Follows the results of complaint and report on a monthly, and annual basis, ➤ Records and reports general and local employment rates and complaints, which are received or observed verbally, ➤ Filling out the "Complaint Register Form & Consultation Form" (see Annex A: Complaint Register Form and Annex B: Consultation Form), ➤ Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed), ➤ Implements the SEP and GMP.

Roles	Responsibilities
Management Quality and Environment Representative	<ul style="list-style-type: none"> Supports SRS on the first evaluation of grievances collected, Supports SRS for recording all formal and informal engagement activities, Determines corrective measures, if necessary, Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the installation stage and to audit the performance of the Contractors.
Health and Safety Representative	<ul style="list-style-type: none"> Determines the national and international legislations that are applicable to the Project activities and informs the General Manager, Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, Provides answers to the OHS related grievances raised by employees, the local community, and local institutions.
Environmental Officer Consultant	<ul style="list-style-type: none"> Supports SRS on the first evaluation of the environmental related grievances collected, Determines corrective measures, if necessary, Checks the Environmental records and performance reviews of Contractors.
Export Trade Manager	<ul style="list-style-type: none"> Responsible for evaluating and fulfilling orders at the time requested by the customers and with service quality, ensuring that customer complaints / requests are received, collecting, and informing the relevant units when customer complaints / requests arrive, and conveying the results to the customer.
Contractors / Subcontractors	<ul style="list-style-type: none"> Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence, Follows the rules listed in this SEP and other relevant management system documentation of the Project. Complying with the requirements and standards of the grievance mechanism procedure.

3 PROJECT STANDARDS

This SEP is prepared based on national and international requirements and standards. During the lifetime of the Project, “Project Standards” will be followed which consist of:

- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- applicable international standards and guidelines,
- interim advice on “Safe Stakeholder Engagement in the context of COVID-19” by IFC.

3.1 Turkish Standards and Requirements

The Constitution of The Republic of Turkey

The main document of the national requirements and standards is “The Constitution of The Republic of Turkey” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

X. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their 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 pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

VII. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are

regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labour Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development.

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

Environmental Law





The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on Environmental Impact Assessment (EIA) (Official Gazette, 17 July 2008, no 26939) is defined which includes a limited public disclosure process. There are EIA positive documents allocated from the relevant ministries for the planned facility.

3.2 Environmental and Social Policy of TKYB

Within this scope, the TKYB closely follows and implements national legislation, laws and regulations to manage its environmental and social impact while fulfilling its legal obligations. It consistently follows national and international developments within the industry and best practices in environmental and social issues. The Bank supports and joins all kinds of environmentally friendly activities and volunteering efforts particularly concerning education and the environment, along with all public and civil society organizations as well as other shareholders who enhance social prosperity and development.

While reducing its negative impact stemming from operational activities, the Bank supports positive environmental movements with its efforts to increase energy and resource efficiency. To this end, the Bank regularly monitors energy, water and paper use, air emissions, waste generation and greenhouse gas emissions and aims to improve its reduction performance.

The Environmental Management System targets the principles below:

-  Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,
-  Create a positive environmental impact and awareness through the Bank's activities and services,
-  Minimize our damaging impact on human health and the environment,
-  Ensure sustainability and continuous improvement of the established system,

- Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

3.3 Applicable International Standards and Guidelines

International standards to be observed by the Project are the IFC Performance Standards and AIBB ESSs. Particularly, 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 influencing, 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 by facilitating their required contributions on the environmental and social issues that may affect them,
- To continuously protect respectful and constructive relations with stakeholders based on mutual confidence and honesty, and by respecting the values of the stakeholders.

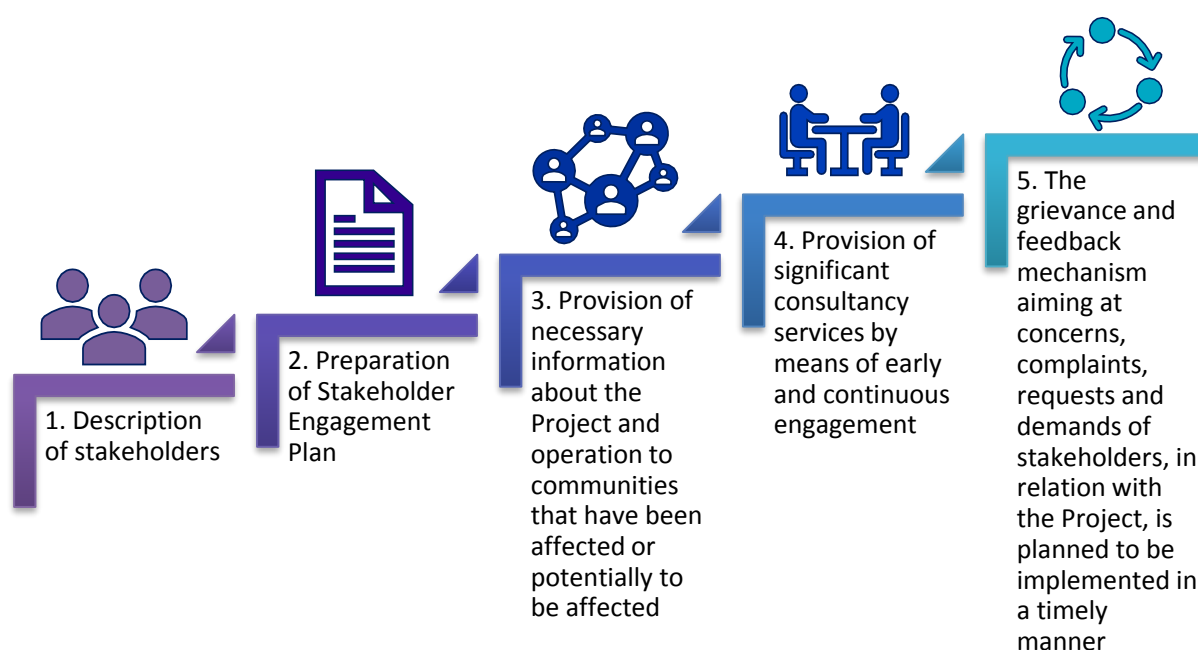


Figure 3.1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.3.1 IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

- 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.
- 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 is to be conducted.

IFC has 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

3.3.2 AIIB Requirements

In Environmental and Social Framework set out by AIIB describe the stakeholder engagement as follows:

*“The Bank believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients to achieve this objective. Meaningful consultation is a process that begins early and is ongoing throughout the Project. It is **inclusive, accessible, timely and undertaken in an open manner**. It conveys adequate information that is understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders’ views as part of decision-making. Stakeholder engagement is conducted in a manner commensurate with the risks to, and impacts on, those affected by the Project.”*

4 STAKEHOLDER ENGAGEMENT

4.1 Early Engagement

The e-mail address and contact number of the office are presented on the website of Petlas (<https://www.petlas.com/contact>). The communication / consultation and sales contract form should be presented on the website of the Project Company. Grievance forms (Complaint Register Form) should be presented as Annex A: Complaint Register Form or in a similar format. External grievance forms should be distributed in public places.

3 formal stakeholder engagement meetings (public hearing meetings), a requirement of the local EIA Regulation, were held during the local EIA processes in Kırşehir. First meeting was conducted on 27.10.2009 at Kırşehir Municipality Assembly Meeting Hall. The second meeting was conducted on 04/09/2014 at the Kırşehir Chamber of Commerce and Industry Meeting Hall. The third meeting was conducted on 25.05.2021 at Kırşehir Süleyman Türkmani Primary School. The meetings were announced in the national and local newspapers per the regulatory requirements and additionally the announcement letters were sent to the Mukhtars of the nearby settlements and presented in the Mukhtars’ offices. The meetings comprised of presentation includes the Project information and record of the comments and suggestions.

MGS held meetings with Kırşehir Chamber of Commerce and Industry, mukhtar of the Gölhisar neighborhood, the Union Chief Representative and Petlas employees on 19.07.2022 to identification of stakeholders and to assess the stakeholder engagement and relations, specific

grievance, and requests. Moreover, socio-economic surveys were conducted with mukhtars of those neighborhoods. Interview photos are given in the Figure 4.1. In these interviews, current communication efficiency with stakeholders is asked and current suggestions, concerns and expectations are recorded. Common expected positive impacts obtained from these interviews are as follows:

Expected Positive Impacts:

- Petlas is very important for Kırşehir,
- Employees and their families contribute to the economy of the province,
- Increase in employment opportunities and new hires.

Suggestions:

- Petlas can donate stationery to schools in the surrounding area.

Concerns:

- No concern was raised.

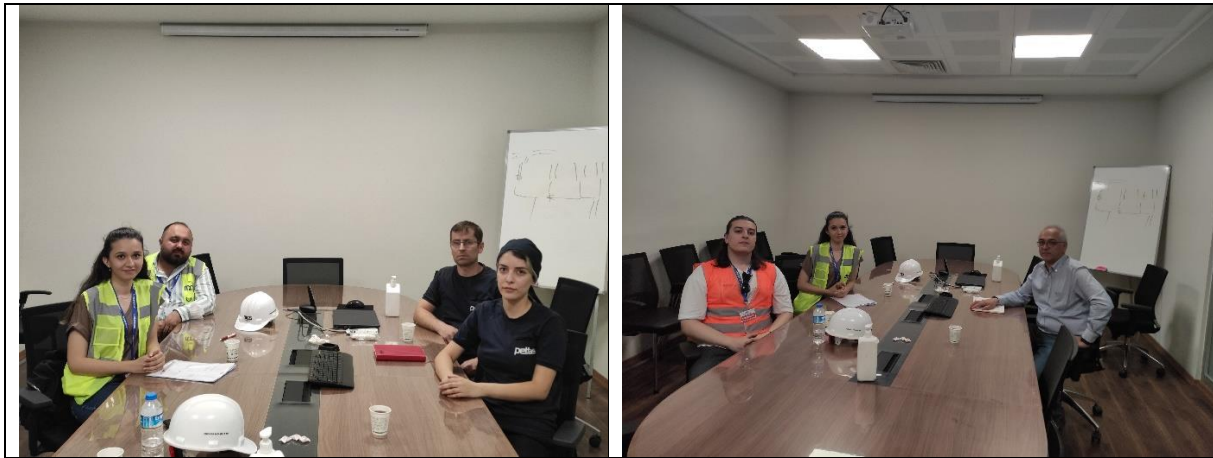




Figure 4.1. Interviews during the site visit

4.2 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 and involved screening the 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 identified stakeholders are presented in Table 4.1.

Table 4.1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
External Stakeholders		
Local Communities		
Mukhtars and residents of nearest settlements.: ➤ Gölhisar Neighborhood	✓	✓
Government		
➤ Governorship of Kırşehir ➤ Kırşehir Municipality ➤ Kırşehir Organized Industrial Zone (KOSB) ➤ Kırşehir Provincial Directorate of Environment, Urbanization and Climate Change ➤ Kırşehir Provincial Directorate of Agriculture and Forestry ➤ Kırşehir Provincial Directorate of Health ➤ Kırşehir Provincial Directorate of Labor and Employment Agency ➤ Merkez District Governorship	✓	✓
NGOs		
➤ Kırşehir Chamber of Commerce and Industry	✓	✓
➤ Kırşehir Mukhtar Association	x	✓
➤ Petrol-iş	✓	✓
Universities and Schools		
➤ Kırşehir Ahi Evran University	x	x
Local Media		
➤ Kırşehir Memleket Newspaper	x	✓
➤ Kırşehir Aşıkpasa Newspaper	x	✓
Internal Stakeholders		
➤ Employees of the Project	✓	✓

4.3 Stakeholder Engagement Programme

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation. The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan (ESAP),
- Meetings with regulatory bodies,
- Public meetings, where necessary,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following Table 4.2 summarizes the stakeholder engagement program in terms of:

- Activity / project,
- Type of information disclosed,
- Location and dates of meetings / forms of communications,
- Stakeholder groups consulted.

In this respect, the following the stakeholder engagement program presented in Table 4.2 is developed accordingly.

Table 4.2. Stakeholder Engagement Programme

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<u>Information Disclosure</u> <ol style="list-style-type: none"> 1. Purpose, start date, duration, and nature of installation and operations activities, 2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts, 3. Closure options and impacts on local communities, 4. Grievance mechanism disclosure, 5. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results, 6. Continue disclosing information via the Project company website. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<u>External Grievance Mechanism</u> <ol style="list-style-type: none"> 1. Disclosure of grievance mechanism to communities, 2. Disclosure of grievances received and resolved to communities. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	SRS
<ul style="list-style-type: none"> ➤ Local business and industries ➤ All affected settlements and mukhtars ➤ Project Workers ➤ Turkish Employment Agency (İŞKUR) 	<u>Employment and Procurement Strategies</u> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Procurement of supplies and services. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SRS

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
<ul style="list-style-type: none"> ➤ All affected settlements and Interested parties ➤ Local communities ➤ Local government ➤ Local businesses and industries 	<u>Use of Emergency Response and Preparedness</u> <ol style="list-style-type: none"> 1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders, 2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	Drills Workshops Community meetings	Annual drills or as required	Management Quality and Environment Representative Environmental Officer Consultant SRS
<ul style="list-style-type: none"> ➤ KOSB ➤ NGOs 	<u>Social progress, economic and social development, and environmental protection</u> Provision of information on: <ol style="list-style-type: none"> 1. Mitigation measures against potential environmental and social risks, 2. Sustainability criteria, 3. Social responsibility projects, implementation principles, 4. Cumulative impacts of project in the region. 	Focus group meetings Workshops Company website	As required / As requested	SRS
<ul style="list-style-type: none"> ➤ Local industries ➤ All affected settlements and mukhtars ➤ KOSB 	<u>Road Transportation</u> <ol style="list-style-type: none"> 1. Road safety awareness, including on safe crossing of the bypass and access roads, 2. Types, number, and frequency of vehicles that can be anticipated through different phases of the Project, 3. Collaboration with local communities and responsible authorities to improve signage, visibility, and overall safety of roads, particularly along stretches located near schools or other locations where children are present, 4. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), 	Face to face meetings Dependent on stakeholder classification	At least annually face to face meetings As requested, / as needed for others	SRS

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
	5. Communication of traffic measures and Project road usage with mukhtars and other industries.			
<ul style="list-style-type: none"> All affected settlements and mukhtars KOSB 	<u>Management of environmental and social risks of the Project</u> Provision of information on: <ol style="list-style-type: none"> Environmental monitoring program Environmental monitoring results Overall information about progress of the Project Cumulative impacts in the region 	Meetings with Mukhtars Brochures Workshops	As required / As requested	SRS Environmental Officer Consultant
<ul style="list-style-type: none"> Vulnerable Groups 	<u>Employment and any other interest of vulnerable groups</u> Provision of information on: <ol style="list-style-type: none"> Recruitment of employees, Training of staff, Use of roads, water, and other infrastructure, increase in traffic density, Local employment, Important commercial opportunities, Environmental impacts. 	Meetings targeting any identified vulnerable groups Women meetings and focus group discussions	Meetings during the installation and operation As requested / as required for other meetings	SRS
<ul style="list-style-type: none"> Workforce All affected settlements and mukhtars Local industries KOSB Local government 	<u>Community Health</u> <ol style="list-style-type: none"> Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities, As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. 	Face to face meetings Dependent on stakeholder classification	At least annually face to face meetings As requested / as needed for others	SRS
<ul style="list-style-type: none"> Employees of the Project Project Contactor employees 	<u>Employee welfare</u> Provision of information on: <ol style="list-style-type: none"> Employee Grievance Mechanism, Labor rights, OHS procedures, 	Face to face interview OHS Committee Labor audits	Monthly or when required due to the results of grievance mechanism	SRS

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
	4. Contractor management.			

4.4 Tools & Methods for Information Disclosure

The Project will provide transparent informative material to the affected communities and the stakeholders in a consistent and timely manner. The manner in which this material will be disclosed is discussed in the sections below.

4.4.1 Internal / Web Site

Although there is no website specific to the existing facility, there is a website serving on behalf of the company in Turkish, English, Spanish, German, Italian, Polish, Portuguese, Russian and Arabic. On this website, there are informative brochures, advertisements about the company, campaigns and a contact form. The homepage of the website will have links to the Company Web Site: <https://www.petlas.com.tr/>

4.4.2 Information Sheets

Information sheets of the plant, key project issues and details regarding the Project's approach to minimizing, mitigating, and managing potential impacts will be prepared and made available on the Project websites. The copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 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 that 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.

On the project website, material providing information about different stages of the project will be available, and stakeholders will be kept posted. When needed, matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities based on impact assessment surveys carried out by company. As long it is appropriate, relevant Project information will be disclosed to the public.

4.4.4 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 (one) week prior to any meeting

via website announcements, through mukhtars and posted information banner in mukhtars' offices,

- 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 the Project to increase participation in meetings,
- The information presented (via presentations, leaflets, website publications etc.) will be clear and will be presented in a non-technical language understood by those in the communities,
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Project 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 (see Annex B: Consultation Form), 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 entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. The Project will inform the public via meetings, media, and other similar means, about how people can access Project related documents (such as this SEP and grievance mechanism procedure) and the project timetable, and how they can submit comments regarding said documents.

In case of unexpected pandemic situations like COVID-19, it is required to develop safe and effective stakeholder engagement and grievance management for maintaining a proactive communication process and providing communities with information in a timely manner. The alternative communication methods such as online platforms should be produced and provided by the Project. Based on the principles of stakeholder engagement and grievance mechanism, alternative communication tools and methods can be as follows:

- Digital platforms, social media, and messaging platforms,
- Secure grievance portal,
- Announcements through the website,
- Online stakeholder engagement workshops by using live web streaming,
- Multiple communication options such as closed captioning for video/conference calls.

5 MANAGEMENT OF GRIEVANCE

5.1 Grievance and Feedback Procedure

As discussed, grievances are complaints, suggestions, and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People.

Grievance mechanism procedure (PTL-PRC-SOC-GMP-001) of the project provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible, and transparent manner.

Grievance procedures will be coordinated through the appointed SRS, who is the primary interfaces between the community and the contractor, and Export Sales Manager who is responsible for customer grievances. Complainants will have the chance to provide their names to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from either Corporate Communications or Human Resources department. The SRS and Export Sales Manager are expected to conduct a bridge between the firm and the employees, to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the company SRS if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, contractors, and other suppliers of the Project.

5.1.1 Principles of the Grievance Mechanism (Internal and External)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.

- **Keeping it up to date:** The process will be regularly reviewed jointly by the SRS and CMR. Regular monitoring and evaluation should be conducted continuously.
- **Confidential and impartial process, non-retribution:** The process will be confidential and impartial, without employees fearing retribution.
- **Reasonable timescale:** A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

5.1.2 Collection, Registration and Evaluation of Grievances

Handling of grievances (collection, registration, and evaluation) will follow these steps:

- Initiate the grievance procedure, mainly by the SRS and Export Sales Manager,
- SRS registers the grievance/comment in the grievance database (see Annex C: Grievance Database),
- The SRS investigates the grievance and makes the first evaluation with the help of relevant responsible department,
- Final decision is made, and further action is implemented to solve the grievance,
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started,
- The complainant is informed about the resolution (at most in 30 days after the grievance is received),
- The grievance is officially closed after related documentation is completed, and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated by SRS and other relevant departments; however, handling and tracking should be ensured to be done mutually.

A complaint form is prepared for official notification of complaints about the project (see Annex A: Complaint Register Form “Open door policy” shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

5.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 days of grievance receipt.

It is important to monitor the ongoing stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is important in maintaining a 'social license to operate'.

The SEP will be reviewed and revised (if needed) annually during steady-state operations, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated.

5.1.4 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 flowcharted in local places.

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the induction training sessions will also include the stakeholder engagement and grievance mechanism process trainings,
- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings,
- The grievance/suggestion boxes will be made available at the Project 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 internal grievances from community:

- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement meetings (including the locations of the grievance/ suggestion),
- Stakeholders will be aware of the location of the grievance/ suggestion forms presented on the website and how to submit their grievances (either through web site or with grievance/ suggestion boxes).

The grievance mechanism constitutes two parts: External and Internal (Workers, contractors, and suppliers of the Project). These two mechanisms will have the same respondent; SRS. That is, External and Internal Grievance Mechanism will be run by SRS. A sample of the grievance form is presented in Annex A: Complaint Register Form.

5.2 Contact Details

Table 5.1. Details of Contacts

Petlas Lastik Sanayi ve Ticaret A.Ş.	Contact Person on the Project Site
<p><i>Centre</i></p> <p>Website: https://www.petlas.com.tr/</p> <p>Address: AKO Kule, Söğütözü Mah. 2178. Cadde No:6 Çankaya / ANKARA</p> <p>Phone: +90 312 309 30 30</p> <p><i>Factory</i></p> <p>Website: https://www.petlas.com.tr/</p> <p>Address: Kindam Mahallesi Ankara-Kayseri Caddesi No:2/1 KIRŞEHİR</p> <p>Phone: +90 386 252 65 50</p>	<p>Phone: To be determined.</p> <p>E-Mail: To be determined.</p> <p>Address: To be determined.</p>

6 MONITORING

6.1 Key Monitoring Activities

The Project 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 (labor rights) and social performance of the Project mainly through:

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

The Project will monitor the effectiveness of the engagement processes by analyzing 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 set out in Table 6.1.

Table 6.1. Key monitoring Measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	<p>Petlas will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> ➤ number of outstanding complaints and grievances opened in a month, ➤ number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), ➤ number of complaints grievances closed in the month; and ➤ type of grievance. 	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records (see Annex B: Consultation Form)	Monthly	Site office

Topic	Indicator	Method	Periodicity	Location
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will 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.	Annual reports	Annually	Site office

6.2 Key Performance Indicators (KPIs)

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KPIs are given in Table 6.2 below.

Table 6.2. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measures
Total number of external complaints or grievances	Total number reduced year on year	Grievance Database
Total number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Total number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Respond stakeholders within 5 days at last / delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Monthly reports
% of all complaints (internal, external, customer) that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (installation), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report
% item of Social Responsibility Program that implemented	Target of 80%	Annual reports

7 TRAINING

All necessary training will be provided as induction training to provide general awareness for all employees of Petlas and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of SEP will be followed by the Social Responsibility Staff, and other responsible personnel and supervisors of Petlas. Contractors are also involved in or overseeing activities with local communities.

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers. The trainings will be given in the first “Induction Training” session. All employees of Petlas and contractors are required to participate in community relations and human rights training.

7.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the implementation of the Stakeholder Engagement Plan and Grievance Management is also provided to the SRS and other responsible personnel with supervisors of Petlas.



8 AUDIT AND REPORTING

8.1 Internal and External Auditing

Internal and External Audits will be carried out to ensure the assessment of the social responsibility program and overall stakeholder engagement. Conformance and aspects of this SEP, which are subject to regulatory audits, will be monitored in accordance with the project management system and separately by Project Lenders. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

8.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

-  Consultation meetings,
-  Fairs and promotions,

- Social responsibility activities and community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations, and incidents which will be managed.

On monthly basis, an overview for grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/ closed out and engagement activities as completed/ongoing will be recorded periodically. SRS will evaluate and conclude this overview with project management in the monthly progress meetings.

ANNEXES

Annex A – Complaint Register Form

Annex B – Consultation Form

Annex C – Grievance Database

Annex D – Grievance Closure Form

Annex A: Complaint Register Form

Grievance Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: _____ What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:		
Date of Incident/Grievance		
	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details):		

Annex B: Consultation Form

TOPLANTI KAYIT FORMU / CONSULTATION FORM			
Formu Dolduran Kişi / Person filling out the form		Tarih / Date:	
Toplantı Gündemi / Agenda of the Meeting		Görüşme Kayıt No/ Consultation Register Number	
1. Toplantı Bilgileri / Meeting Information			
Name of Authorized Person:		İletişim Şekli / Form of Communication :	
İstişare Edilen Kurum / Institution Consulted		<input type="checkbox"/> Telefon-Ücretsiz Hat / Phone-Free Phone Line	
Telefon / Telephone:		<input type="checkbox"/> İstişare Toplantısı / Consultation Meeting	
Adres / Address:		<input type="checkbox"/> Website / E-mail Web Sitesi / E-posta	
Köy - İlçe - İl Village -District -Province:		<input type="checkbox"/> Diğer (Açıklayın) / Other (Specify)	
Paydaş Tipi / Consultee/Stakeholder Type			
2. İstişare Detayları / Details of Consultation			
Projeyle İlişkin Sorular / Questions regarding the project :			
Kaygılar & Geri bildirimler / Concerns & Feedbacks :			
Özel Notlar (Formu dolduran kişinin düşünceleri)			

Grievance Database

Reporting Period

[illegible]

* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 10 days that the grievance solution process has started.

** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved.

Annex D: Grievance Closure Form

Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Date: /...../.....	<div> Name Surname / Signature of the Person Complainant Closing the Complaint </div> <div> Name, Surname / Signature of </div>



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