



EVYAP Soap Oil Glycerin Industry & Trade Incorporated CO.

EVYAP Operation Capital Investment Project

Grievance Mechanism Procedure (Internal & External) (Plan No: EVYP-PRC-SOC-001)

February 2022



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Abbreviations

AIIB	Asian Infrastructure and Investment Bank
BP	Bollard Pull
DCC	Document Control Center
EIA	Environmental Impact Assessment
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
HR	Human Resources
H&S	Health and Safety
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. /MGS Project Consultancy Engineering Trade Limited Co.
NGO	Non-Governmental Organisation
OHS	Occupational Health and Safety
Project Company	Evyap Sabun Yağ Gliserin San. Tic. A.Ş./ Evyap Soap Oil Glycerine Industry and Trade Incorporated Company
PAP	Project Affected People
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	EVYAP Operation Capital Investment Project

1 INTRODUCTION

This Grievance Mechanism Procedure (Internal and External) is prepared for EVYAP Operation Capital Investment Project to fulfill the required studies the Environmental and Social Impacts of the Project according to IFC Performance Standards (“PSs”), Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy and AIIB Environmental and Social Standards (“ESSs”). The reference number of this Plan is EVYP-PRC-SOC- GMP-001.

1.1 Background

Evyap Sabun, which started its activities with soap production in Erzurum in 1927, continues its production by expanding its product range today by adding many categories such as soap, shower gel, shampoo, shaving products, skin care products, scented cosmetics, baby diapers and toothpaste. Evyap exports a significant part of Turkey’s soap and personal care products. In addition to its factory in Istanbul Tuzla Deri OSB, EVYAP offers its products to foreign markets with its production factories and liaison offices in various countries of the world. Within the scope of the project, it is planned to be used for the expenses of the business. There will be no construction work within the scope of the Project.

The location of the Project Area is in Istanbul Tuzla Leather District Zone within administrative borders of Tuzla District of İstanbul Province. There are industrial facilities in the region that carry out similar activities with the planned Project. The planned Project Area is located approximately 3,1 km from Tuzla District Centre and about 49 km to the İstanbul City Centre, covering an area of 322,713.02 m².

1.2 Scope

This document outlines the grievance mechanism procedure which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints and comments that may arise as a direct or indirect result of the environmental and social performance of the Project. The Grievance Mechanism Procedure (GMP) is not a replacement for stakeholder engagement activities.

This procedure covers all the grievances raised by internal and external stakeholders, including the activities of contractors. This procedure is a part of the Management Plans developed for the Project. This procedure has overlaps and cross-linkages to the Stakeholder Engagement Plan (SEP) (EVYP-PLN-SOC-001) and Environmental and Social Management Plan (EVYP-PLN-HSSE-001) particularly concerning the contractor’s activities.

1.3 Purpose

The purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into business to minimize social risks. The grievance mechanism aims to ensure that all comments and complaints concerning the Project will be considered transparently and the related measures will be taken. The processes and responsibilities of this procedure will be defined for both external stakeholders and internal direct and indirect employees.

This procedure is owned by the Social Responsibility Staff (SRS) of the Project.

This document aims to identify:

- the scope of grievance mechanism procedure and the applicable management interfaces,
- the definition of roles and responsibilities,
- the applicable project standards, project commitments, operational procedures, and guidance relevant to this Procedure,
- monitoring and reporting procedures, including Key Performance Indicators (KPIs),
- training requirements and references for supporting materials and information,
- the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- how to minimize community conflict by systematically addressing grievances.

Key risks identified in the Environmental and Social Due Diligence (ESDD) and addressed by this procedure are:

- To provide a channel for workers and all external stakeholders to voice their concerns efficiently and transparently,
- To provide a channel for external stakeholder and workers in particular women and illiterate persons to log complaints through engagement activities by Social Responsibility Staff (SRS),
- To establish a transparent and mutually respectful relationship with the employees in general,
- To allow for confidential complaints to be raised and addressed by workers,
- To create a culturally acceptable and accessible process to allow employees to raise their issues, concerns, problems, and claims.

This procedure is not limited but can be updated. The procedure will be reviewed on annual basis operation. During steady-state operations, this procedure will also be reviewed on an annual basis to determine if there are any changes or updates required to the procedure unless a more frequent update is required to reflect changing project design or procedures. Any requests for changes to this procedure must be addressed to the owner of this procedure and will be subject to appropriate review and approval processes.

1.4 Definitions

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.

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.

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.

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

2 ROLES AND RESPONSIBILITIES

2.1 Key Principles

The Internal (Worker) and External Grievance Mechanisms will be implemented by relying on the following key principles for all the Project-related comments, issues, and complaints internally and externally.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure clearly and understandably.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individuals 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 is considered in the manner of regional concerns and a convenient resolution process will be taken.

2.2 Roles and Responsibilities

This section includes an overview of the roles and responsibilities of the grievance mechanism procedure.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
CEO / Project Manager	<ul style="list-style-type: none"> ➤ Ensuring that this procedure is implemented properly, ➤ Providing necessary resources for the implementation of the procedure.
Supply Chain Services Manager / Category Leader	<ul style="list-style-type: none"> ➤ Approval of this Plan and resources required for implementation, ➤ Coordinating with parties for implementation of the procedure.

Roles	Responsibilities
<p>Social Responsibility Staff (SRS) (for internal/external grievances) / Complaint Management Representative (for customer grievances)</p>	<ul style="list-style-type: none"> ➤ Implements and improves this procedure, ➤ Ensures the Project compliance with the Project Standards and other requirements set out in this Management Procedure, ➤ Ensures that all site staff, including Subcontractors worker's complaints process and resolutions, comply with this Procedure, ➤ Informing to workers about contract details and legal rights, ➤ Determining and provides the necessary training materials for employees, ➤ Determining necessary resources for proper implementation of the procedure and submits to managers, ➤ Evaluating in compliance with laws and regulations, ➤ Searching 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, ➤ Monitoring all complaints and ensures that all complaints are resolved and closed, ➤ Coordinating with parties for implementation of the procedure ➤ Creating all necessary reporting of worker grievance including monthly report to Top Management, ➤ Organizing cooperation activities with local communities, ➤ Investigating and proposes appropriate methodology for resolving the complaint, ➤ Organizing stakeholder meetings to collect the responses to grievances actively as required, ➤ Following procedures related to employment and training for site-specific issues, ➤ Recording and reporting general and local employment rates and complaints, which are received or observed verbally, ➤ Filling out a "Complaint Register Form" (see Appendix A), ➤ Following the results of complaint and report on a weekly, monthly, and annual basis.
<p>Health and Safety and Environmental (HSE) Manager</p>	<ul style="list-style-type: none"> ➤ Supporting SRS on the first evaluation of the relevance of grievances collected, ➤ Conducting internal audits/site audits, ➤ Providing answers to the OHS, environment and social grievances raised by employees, the local community, and local institutions, ➤ Helping SRS for keeping the record of the complaints/ suggestions in the Grievance Database with details, ➤ Evaluating in compliance with laws, regulations, and Project requirements with legal departments, ➤ Participating and supports the audits that will be done by third-party auditors.
<p>Document Control Center (DCC) Staff</p>	<ul style="list-style-type: none"> ➤ Knowing the roles and responsibilities in all Project documents,

Roles	Responsibilities
	<ul style="list-style-type: none"> ➤ Uploading all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, ➤ Recording and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, ➤ Making documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors	<ul style="list-style-type: none"> ➤ Complying with the requirements and standards of this procedure, ➤ Fulfilling the works under the contract.

3 PROJECT STANDARDS

The implementation and the procedure of this plan developed for EVYAP Operation Capital Investment Project will comply with the related national and international requirements and standards. The Project Standards involves:

- applicable Turkish Standards and Turkish EIA requirements,
- Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- applicable international standards and guidelines.

3.1 Applicable Turkish Standards

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.

3.2 Turkish EIA Requirements

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. The Environmental Impact Assessment (EIA), which was presented to the Ministry of Environment and Urbanization on 11.11.2016 in line with the national EIA Regulation, was conducted. The “EIA Positive” Decision (No: 4423) was obtained on 13.12.2016.

3.3 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.

3.4 Other Commitments and Requirements

There are no other applicable commitments and requirements of Turkish Government authorities related to this plan.

3.5 Applicable International Standards and Guidelines

The international standards and guidelines which the Project will follow are set by International Finance Corporation (IFC) and Asian Infrastructure and Investment Bank (AIIB). IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (GN1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions*
- *AIIB ESS 1 Environmental and Social Assessment and Management.*

3.5.1 IFC Performance Standards

IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (GN1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions.*

Key objectives of *PS1* related to external grievance management are:

- To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,
- To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks and impacts to workers, Affected Communities, and the environment.
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.

- To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

- To develop a grievance mechanism to receive and facilitate the resolution of Affected Communities' concerns and grievances related to environmental and social performance of the Project,
- To identify the risks and impacts of the Affected Communities and other stakeholders,
- To maintain an understandable, culturally appropriate, accessible and transparent consultation to stakeholders through early and ongoing engagement,
- To inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
- To follow the developed grievance mechanism to receive and respond to stakeholder concerns related to the Project promptly.
- To establish a monitoring and review procedures of the concerns and grievances raised by Affected Communities and stakeholders.

Key objectives of *PS2* related to worker grievance management are:

- To create equal, fair, and nondiscriminatory working opportunities for every worker,
- To develop, maintain, and improve the worker-management relationship,
- To promote compliance with national employment and obey the labor laws,
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain by developing a reliable grievance mechanism,
- To identify, evaluate and respond to workers concerns and grievances in a timely manner,
- To promote safe and healthy working conditions to direct and indirect workers,
- To avoid the use of forced and child labor.

Key requirements implemented by the Project according to *PS2* are as following:

Human Resources Policy, Terms of Employment and Working Conditions & Relationship

- The Project will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits.

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- The Project will make all policies understandable to all workers.
- The Project will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

- The Project will comply with the national labor law which contains rights of workers to form and to join workers' organizations.
- If national law restricts the right to organize and workers' organizations, the Project will enable the means for workers to bargain collectively and to organize and establish an alternative way for workers to file grievances.
- The Project will not discriminate against workers who choose to organize and create equal conditions for all the workers.
- Worker representatives should be given access to management.

Non-Discrimination and Equal Opportunity

- The Project will hire, promote, and compensate workers solely based on their ability to do the job and all workers are provided equal access to training, tools and opportunities for advancement.
- The Project will ensure that all workers will be free from harassment by management or other workers.

Retrenchment

- The Project will establish and implement a procedure to mitigate the adverse impact of retrenchment and carry out an analysis of alternatives to retrenchment.
- The procedure will incorporate non-discrimination principles and include the input of workers, their organizations, where appropriate, the government.

Child Labor

- The Project will not employ workers under the minimum age for employment as defined by national law.
- Workers between the minimum age and 18 will not be employed in dangerous work or work that interferes with their education or development.

Forced Labor

- The Project will not employ forced labor which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty and

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- The Project will respect and protect rights of workers to retain their personal documents and money.
- The Project will respect the rights of workers to leave the workplace after work.

Grievance Mechanism

- The Project will provide a grievance mechanism for workers and develop it as a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- The Project will ensure that there will be no discrimination against those that express grievances, and all the grievances are considered seriously and take prompt, appropriate action.
- Any grievance mechanism will not replace other channels as defined by law or collective bargaining agreements.

Occupational Health and Safety

- Workers are not unreasonably endangered at work or in dormitories and all the necessary precautions to mitigate work-related risks and develop an emergency prevention and response system.
- Workers will be provided personal protective equipment and will be trained in its use.
- The Project will document and report accidents, diseases, and incidents during the Project.

Workers Engaged by Third Parties

- The Project will extend the labor standards performance policies and procedures to contractors hired directly or through employment agencies.
- The Project will not use contracting as a means of circumventing labor rights and laws and will ensure all the workers have access to a grievance mechanism.
- The Project will monitor contractors, employment and recruitment agencies to verify their adherence to labor rights and laws.

Supply Chain

- The Project will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- The Project will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.
- The Project will monitor the performance of suppliers according to PS2 requirements concerning child labor and forced labor and significant safety issues.

3.5.2 AIIB Environmental and Social Standards

AIIB believes that transparency and meaningful consultation is essential for the design and implementation of a Project and works closely with its Clients (in this Project, “EVYAP”) 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.

AIIB requires EVYAP to undertake an environmental and social assessment that consist of varying elements including stakeholder identification and consultation plan and public consultation and information disclosure.

Also, AIIB requires EVYAP to engage in meaningful consultation with stakeholders during the Project’s preparation and implementation phases, in a manner commensurate with the risks to, and impacts on, those affected by the Project. The ESF explains the Meaningful Consultation as:

“Meaningful consultation is a process that: (a) begins early in the preparation stage of the Project and is carried out on an ongoing basis throughout the implementation and life cycle of the Project; (b) ensures that all parties have a voice in consultation, including national and subnational government, the private sector, nongovernmental organizations and people affected by the Project, including, as applicable, Indigenous Peoples; (c) provides additional support as needed to ensure participation of women, elderly, young, disabled, minorities and other vulnerable groups; (d) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to the people affected by the Project and other stakeholders; (e) is undertaken in an atmosphere free of intimidation or coercion; (e) is gender inclusive, accessible, responsive and tailored to the needs of vulnerable groups; and (f) enables the consideration of relevant views of people affected by the Project and other stakeholders in decision-making. Continue consultation with stakeholders throughout Project implementation as necessary on issues related to environmental and social performance and implementation of the Project-level grievance mechanism.”

In addition to meaningful consultation, environmental and social information on the Project must be available, in an accessible manner, and in a form and language(s) understandable to affected people and other stakeholders, during preparation and implementation of the Project

so as to provide an opportunity to broadly identify and address environmental and social risks and impacts, those involving Involuntary Resettlement and Indigenous Peoples, and including community health and safety issues, according to AIB ESS-1. In particular, disclose the draft environmental and social assessment documents (including the ESMP, and, as applicable, any ESMPF, or other approved forms of documentation) in a timely manner in accordance with paragraph 57 of the ESP, in an accessible place, and in a form and language(s) understandable to affected people and other stakeholders; this includes documentation required under ESS 2 and ESS 3, as applicable. Moreover, in the same manner the final assessment documents, as they become available, and any updates must be disclosed to affected people and other stakeholders. Regularly disclosure of the updated environmental and social information, in the same manner, along with information on any material changes in the Project must be performed according to AIB requirements.

In this respect, a Grievance Mechanisms is established as a part of the Stakeholder Engagement Plan and Environmental and Social Management System in order to meet the meaningful consultation and other stakeholder engagement requirements.

Key issues included regarding grievance mechanism in AIB ESS 1 are as follows:

➤ Environmental Coverage:

- Environmental Risks and Impacts
- Biodiversity Impacts
- Critical Habitats
- Natural Habitats
- Protected Areas
- Sustainability of Land and Water
- Pollution Prevention
- Resource Efficiency
- Climate Change
- Greenhouse Gases

➤ Social Coverage

- Vulnerable Groups and Discrimination
- Gender
- Land and Natural Resource Access
- Loss of Access to Assets or Resources or Restrictions on Land Use
- Cultural Resources

➤ Working Conditions and Community Health and Safety

- Safe Working Conditions and Community Health and Safety
- Child Labor and Forced Labor
- Labor Management Relationships in Private Sector Projects
- Building Safety
- Traffic and Road Safety
- Security Personnel.

3.6 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

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 (PAP).

Grievance procedures 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 Social Responsibility Staff (SRS) who is the primary interfaces between the community and Project. Complainants will have the chance to provide their names in order 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 Human Resources department. The SRS is expected to conduct a bridge between the company and the employees, in order 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, subcontractors and other suppliers of Project.

The internal and/or external grievance mechanism process to be followed to resolve any grievances is described in below Figure.

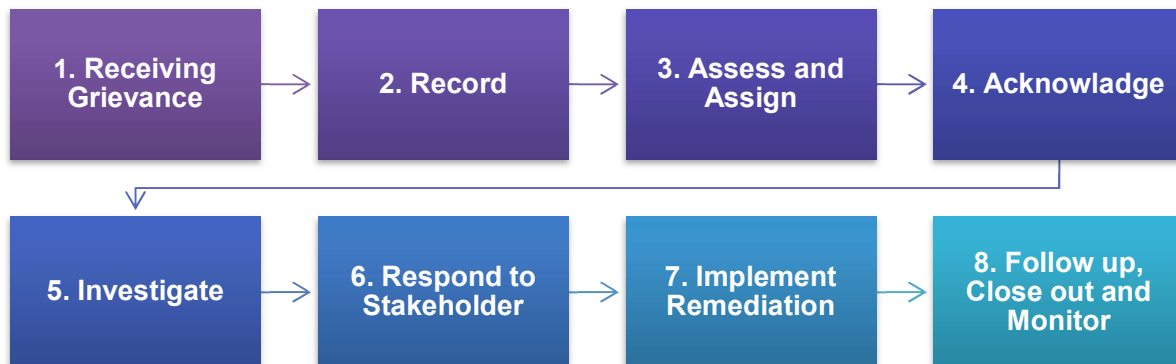


Figure 4-1. Processes of Internal and External Grievance Management

4.1 Principles of the Grievance Mechanism

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 the HSE Manager. 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 working 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.

4.2 Grievance Mechanism Communications

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers (CEO / Project Manager, Supply Chain Services Manager / Category Leader, SRS / Complaint Management Representative, HSE Manager, etc.) should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places and/or in DCC.

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 first HSE training sessions will also include the stakeholder engagement and grievance mechanism process,
- Communication about the grievance mechanism will be repeated regularly with the toolbox trainings,
- The grievance/suggestion boxes will be made available at the Project facility sites 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 external stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion);
- The grievance/suggestion boxes will be made available at the Mukhtars' offices or villagers' gathering points (such as tea houses etc.) in the nearest settlements; and
- 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).

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of EYAP). All these mechanisms will be run by the SRS, while internal grievances will be conducted by collaborating other different departments, such as HR, Finance, Corporate Communications, HSE Department and alike.

4.3 Internal (Worker) Grievance Management Process

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments and concerns (*See Appendix B*). Since the confidentiality of the complainant should be preserved, grievances are collected in grievance boxes which will be placed in areas workers can easily access, including dining rooms. Through these forms, workers will also be able to make anonymous complaints. Information on how to express complaints, opinions and suggestions to workers will be provided during the orientation training process. Written submissions will not be used in any way to intimidate those submitting the complaints.

Management will treat the grievances seriously and take prompt, appropriate action. "Social Responsibility Staff" will have the main responsibility to collect the complaints. The complaints will be discussed with management in order to gather accurate information about a given

complaint. Social Responsibility Staff will process the complaint/concern and provide a resolution. Resolutions of complaints will be developed in accordance with relevant Turkish laws, regulations, as well as international requirements. Feedback will be provided to those involved.

It is possible to extend the process for the complex grievances and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during solution process. Social Responsibility Staff aims to respond in cooperation with the related department and solve each complaint within 30 calendar days. The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this procedure should be fulfilled.

4.3.1 Implementation and Updates of the Procedure

This procedure will be reviewed on a minimum of a annual basis during operational phase. During steady-state operations, this procedure will also be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs. The revision of this procedure will be the responsibility of the “Social Responsibility Staff” who is the custodian of the procedure.

If material changes to operating procedures are required the procedure may be updated on an “as required” basis. If there is any revision on this procedure, it will be uploaded to the Document Control Center (DCC) of the Project to ensure that all staff has access to the latest version of this procedure.

4.4 External Grievance Management Process

The steps of the grievance management process consist of (i) receiving the grievance, (ii) assessing, (iii) sending acknowledgement, (iv) investigating, (v) feedback to stakeholder, (vi) implementing the remediation activities and (vii) closure.

4.4.1 Receiving Grievances

Grievances are received through all available channels such as phone, mail, grievance forms, websites, contractors and etc. The stakeholder can raise a grievance by filling out the grievance form. Once the form is completed then “Social Responsibility Staff” will process the form according to the grievance procedure.

Table 4-1. Details of Contacts

Evyap Sabun Yağ Gliserin San. ve Tic. A. Ş	Contact Person on the Project Site
<p>Website: https://www.evyap.com.tr</p> <p>Address: İstanbul Deri Organize Sanayi Bölgesi Güderi Caddesi No: 1 Parsel (34957) Tuzla – İSTANBUL</p> <p>Phone: +90 (216) 581 07 00</p>	<p>Phone: To be determined.</p> <p>E-Mail: To be determined.</p> <p>Address: To be determined.</p>

The existing contact details of the Project is given above. The contact information regarding the assigned SRS (name and contact number/e-mail address) will be included when this Plan is updated.

The Complaint Register Form (See Appendix A) will be used to collect the information about grievances, concerns and the complainant. All grievances will be recorded and collected in the Grievance Database (See Appendix C). “Open door policy” will not be encouraged as the one and only way of communication, therefore, written complaints anonymously (or not) should be encouraged.

4.4.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into “Grievance Database” (See Appendix C). The Social Responsibility Staff investigates the grievance and makes the first evaluation with the help of other related departments. The Project investigates the grievance and involves appropriate departments in its investigation and formulation of a resolution.

The complainant may be contacted (if not anonymous) to gather more information, using the “Consultation Form” (see Appendix D). Any correspondence with the Complainant will be recorded in the “Complaint Register Database”. When final decision is made on grievance, feedback will be given to stakeholder.

4.4.3 Feedback to Stakeholder

Complainants will receive a formal response acknowledging that the Project has received the grievance, within 5 working days of submitting the grievance. Complaints received anonymously will be investigated in the same manner as non-anonymous complaints, but no formal response will be issued.

4.4.4 Propose Resolution/Corrective Action

Within 30 days of receipt of the grievance, responsible person from the Project will formally communicate a proposed resolution or corrective action to the complainant (if not anonymous) and discuss it with the complainant. The complainant will be informed about the methodology followed. All communication will be recorded in the “Complaint Register Database”.

4.4.5 Closure of Grievances

The grievance procedure of the Project aims to formally close out every grievance within 30 working days after receiving it, unless an alternative agreement is made with the complainant. Note that this alternative agreement must be reached within these 30 days. Closure requires the signature of the complainant (if not anonymous) on the Grievance Closure Form (see Appendix E), which details the agreed resolution. The signed “Grievance Closure Form” will be recorded in the “Grievance Database”.

4.4.6 Non-Resolution Case

If a grievance cannot be resolved although efforts will be made to solve the concern within the set timeframe, the Project will involve other external experts, neutral parties or local and regional authorities, as necessary and appropriate. Moreover, an explanation to the complainant about why the grievance cannot be resolved will be given.

5 MONITORING

5.1 Overview of Monitoring Requirements

In compliance with the Project Standards which is described in Section 3 of this procedure, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

5.2 Key Monitoring Activities

The key monitoring activities are used to assess grievance management. The Project will also monitor the efficiency and application of the third-party grievance mechanism. The procedures and the grievance management tool will be adjusted as required. Key monitoring measures are set out in Table 5-1 below.

Table 5-1. Key Monitoring Measures

Topic	Indicator	Method	Period	Location
Grievances/ Concerns	<p>The Project 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 the 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
Customer Satisfaction	Complaint Management Representative will keep records written and verbal complaints raised by customers.	Customer Grievance Records and Satisfaction Surveys	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc. and consultation forms will be filled out.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Site office
Disclosure Materials/ 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

5.3 Key Performance Indicators (KPIs)

The Table 5-2 below summarizes the key performance indicators and related key monitoring actions. These can be used to assess the progress and effectiveness of the proposed mitigation strategies.

Table 5-2. Key Performance Indicators (KPIs)

KPIs	Target	Monitoring Measures
Total number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints 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 (construction), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report

6 TRAINING

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

6.1 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 the Project and contractors are required to participate in community relations and human rights training. This training will provide the information on how to understand and respect different cultures and opinions and to be an effective team member by behaving appropriately with locals and colleagues.

6.2 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 application of the Grievance Management is also provided to the Social Responsibility Staff (SRS) and other personnel and supervisors of the Project and contractors involved.

7 AUDIT AND REPORTING

In this section, auditing internally and externally is involved. For the Project activities, record keeping, and reporting basics are explained.

7.1 Internal and External Auditing

Internal and External Audits will be carried out in order to ensure the assessment of the mechanism's efficiency by Social Responsibility Staff. Conformance and aspects of this procedure, which are subject to regulatory audits, will be monitored in accordance with the Project Environmental, Health, Safety and Social Management System and separately by Project Lenders. Daily conformance will be monitored in accordance with the Project Management System. Contractors will be subject to inspection and audit by the Project prior to a contractor's initial appointment.

7.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and closeout of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- News on press and interviews,
- Audits, investigations, and incidents which will be managed according to the Project procedures.

On a monthly basis, an overview of the grievances recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out will be developed periodically. The Social Responsibility Staff (SRS) and HSE Manager will evaluate and conclude this overview with project management in the monthly progress meetings.

APPENDICES

Appendix A: Complaint Register Form

Appendix B: Internal Grievance Form

Appendix C: Grievance Database

Appendix D: Consultation Form

Appendix E: Grievance Closure Form

Appendix 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):		

Appendix B: Internal Grievance Form

Reference No:		
Full Name Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent	Name & Surname: _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I 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:
Complaint is closed by:		
Actions taken (Provide details):		

Appendix D: 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)			

Appendix E: 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: /...../.....	Name Surname / Signature of the Person Closing the Complaint	Name, Surname / Signature of Complainant



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