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SİSTEM ALUMINIUM INDUSTRY AND TRADE INC.

STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE REDRESS MECHANISM

dokay
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**SİSTEM ALUMINIUM INDUSTRY AND TRADE INC.
CAPACITY INCREMENT IN PRODUCTION AND SCRAP
METAL RECOVERY**

**STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE
REDRESS MECHANISM**

PROJECT NO:

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ABBREVIATIONS

CIMER	: Presidential Communication Center
DOKAY	: DOKAY-EIA Environmental Engineering
EIA	: Environmental Impact Assessment
GRM	: Grievance Redress Mechanism
IFC	: International Finance Corporation
MoEU	: Ministry of Environment, Urbanization and Climate Change
NGO	: Non-governmental Organization
OHS	: Occupational Health and Safety
OIZ	: Organized Industrial Zone
PDoEU	: Provincial Directorate of Environment and Urbanization
PIR	: Project Information Report
PS	: Performance Standards
QMS	: Quality Management System
SEP	: Stakeholder Engagement Plan
TKYB	: Development and Investment Bank of Turkey
WWTP	: Wastewater Treatment Plant

1 OBJECTIVE AND SCOPE

This Stakeholder Engagement Plan and Grievance Redress Mechanism (“SEP+GRM”) was prepared for the increment of the production and scrap metal recovery capacity of “Sistem Aluminium Industry and Trade Inc.” (“Project Owner”) by purchasing new machinery and setting up the new production lines (“Project”). This report was created by DOKAY-EIA Environmental Engineering (“DOKAY”) taking into account the characteristics, sensitivities and socio-economic benefits of local communities that may be affected by the activities to be carried out during the implementation of the Project.

The capacity increment activities will include the setup and operation of the new pieces of machinery and production lines that will be defined in Section-2 of this report.

In this context, SEP+GRM, was prepared by considering the (i) national legislation, (ii) credit standards of Development Investment Bank of Turkey, (iii) International Finance Corporation (“IFC”) Performance Standards (“PSs”).

The scope and main objectives of the SEP+GRM are listed below:

- Identification of the main and strategic stakeholders of the Project.
- Definition of the necessary approaches to ensure effective communication with identified stakeholders.
- Establishing mutual relations between Sistem Aluminium and the local communities and internal stakeholders.
- Ensuring that stakeholders are informed on time about the investments made, capacity increment activities, and the possible environmental and social risks and impacts that may arise at these stages.
- Ensuring that the information and/or documents that are shared with the stakeholders are correct and clear.
- Identifying the methods and programs for consultation processes that will be conducted with the stakeholders and especially with the vulnerable groups during the capacity increment phase.
- Ensuring that all interested parties are involved in the process.
- Helping the stakeholders by recording and resolving the grievances about the Project in case they have any.
- Ensuring that a redress mechanism will be established for helping the stakeholders by recording and resolving the grievances about the Project in case they have any, at a specific time.
- Identifying the roles and responsibilities regarding the implementation and application of SEP+GRM.

SEP+GRM is a vital document, and it will be monitored, covered, and updated by Sistem Aluminium in all stages of the Project by including all stakeholder interviews.

2 PROJECT DEFINITION

Sistem Aluminium Industry and Trade Inc. is one of Turkey's leading manufacturers of aluminum extrusion profiles and aluminum composite panels companies in Turkey. Founded in 1994, it is a fully integrated designer and producer of architectural facade systems and extruded aluminum profiles for industrial applications.

Sistem Aluminium's Ergene-Tekirdağ factory is established on an area of 116,156 m², 90.000 m² of which is enclosed. Site location map of the Project Area is given in Figure 2-1. The satellite image of the Project Area is given in Annex-1.

In this fully integrated factory, there are dyehouse facilities, foundry - billet production, aluminium extrusion lines, electrostatic powder coating, and anodizing facilities, transfer wood coating department, mechanical processing facility, and also composite panel production lines.

In the scope of the increment of the capacity of the Facility, it is planned to increase the capacity of melting, casting, anodized coating, powder painting, profile production, and composite panel production.

In addition, in order to produce granules from plastic burrs formed in the composite panel section, plastic granule line is planned to be added.

Moreover, a capacity increase of the existing combustion and energy systems (cogeneration, steam boiler, etc.) in the facility will be accomplished within the scope of the Project.

The machineries and items that will be added to the production in the scope of the Project are listed in Table 2.1. This table shows the elements of the capacity increment project and their purchase and operation start dates.

Table 2.1: Additional Machineries and Items in the Scope of the Project

Additional Machineries and Items in the Project	Purchase Date	Operation Start
Kneader Mixer	27.07.2020	September 2021
CNC Turning Machine	27.05.2021	May 2021
Conveyor	07.07.2021	August 2021
Pultrusion Machine	16.08.2021	August 2021
Molding Equipment	06.07.2021	November 2021
Melting Furnace (2 Pieces)	16.02.2021	July 2022
Homogenizing Furnace (70 kTons/year)	16.02.2021	July 2022
Aging Furnace	16.02.2021	July 2022
Heat Treatment Furnace	18.05.2021	December 2021
Mangle Machine (7 inches and 10 inches) + Conveyor Equipment	16.11.2021	November 2021
Additional Mangle Machines (Kautec Solution)	Has not been purchased yet	

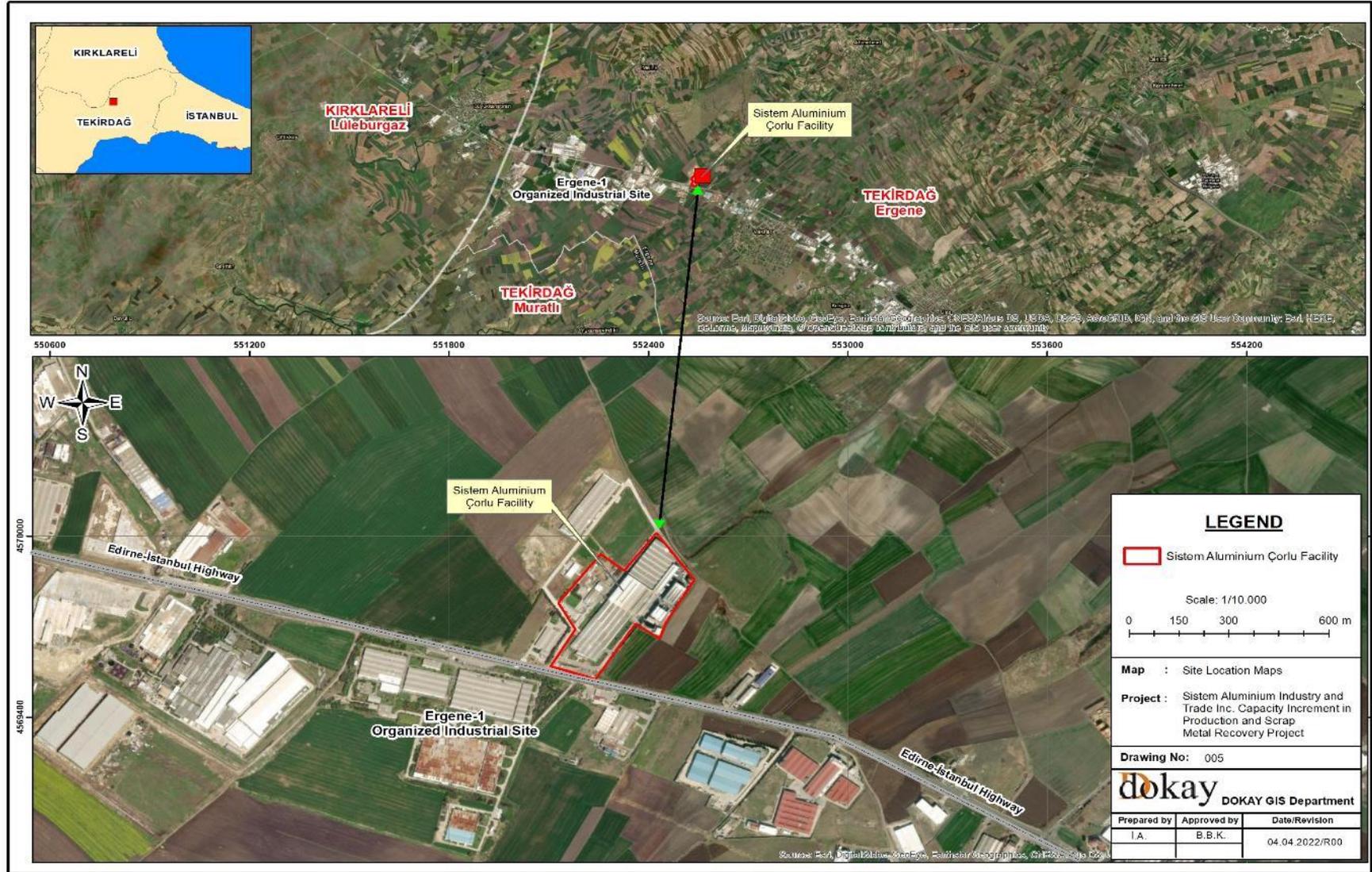


Figure 2-1: Site Location Map

3 LEGAL FRAMEWORK AND INTERNATIONAL STANDARDS

During the stakeholder engagement process of the Project, in addition to the national legislation, Performance Standards (“PS”) established by the International Finance Corporation (“IFC”) and all policies, standards, plans, and procedures created by Sistem Aluminium will be taken into account. Information about the aforementioned national and international legal regulations is given in the following sections as subtitles.

3.1 National Legislation and Official Grievance Channels

3.1.1 The Constitution of the Republic of Turkey

The Constitution of the Republic of Turkey (Law Numbered:2709; Date of Ratification: 07.11.1982), consists of the necessary regulations that should be taken as a basis for the stakeholder engagement components. The Constitutional provisions regarding the stakeholder engagement issues are listed below.

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 disclose their thoughts and opinions; cannot be condemned and accused of their opinions.

Freedom of Explaining and Spreading Thought (Article 26):

Everyone has the right to express and disseminate their thoughts and opinions, either alone or collectively, by word, text, picture, or other means. This freedom includes the freedom to receive or give news or ideas without the interference of official authorities.

Health, Environment and Housing (Article 56):

Everyone has the right to live in a healthy and balanced environment. It is the duty of the state and citizens to improve the environmental quality, protect environmental health and prevent environmental pollution. The state ensures that everyone lives their lives physically and mentally healthy; it regulates the planning and service of health institutions from a single source in order to realize cooperation by increasing savings and efficiency in human and substance power. The state fulfills this task by utilizing and supervising the health and social institutions in the public and private sectors.

3.1.2 Right to Information Act

The Right to Information Act (Law No: 4982), published in the Official Gazette dated 24.10.2003 and numbered 25269, regulates the principles and procedures regarding the act of the right to information in accordance with the principles of equality, impartiality, and openness required by a democratic and transparent administration. In accordance with Article 4 of Section Two, everyone has the right to information.

3.1.3 Law on Exercise of the Right to Petition

The Law on the Exercise of the Right to Petition (Law No: 3071) entered into force through the Official Gazette dated 10.11.1984 and numbered 18571. The law aims to regulate the way of

implementing a right of making written applications to the Grand National Assembly of Turkey and competent authorities from Turkish citizens and foreigners residing in Turkey about their wishes and complaints about themselves or the public.

In accordance with Article 3 of the Law on the Exercise of the Right to Petition, Turkish citizens shall have the right to make written applications to the Grand National Assembly of Turkey and competent authorities about the wishes and complaints related to themselves or the public.

3.1.4 Environmental Impact Assessment Regulation

Environmental Impact Assessment Regulation (Official Gazette dated 25.11.2014 and numbered 29186) presents the legal framework about the public participation meetings which are the important constituents of environmental impact assessment ("EIA") process.

First of all, a project owner prepares a report named "Project Introduction Report (PIR)" and presents it to the MoEU for determining whether "EIA is necessary" for the Project or not. If EIA is necessary for a project, necessary studies are accomplished in order to complete the environmental impact assessment of the Project; one of them is the public participation studies.

Public participation meeting is held as a legal requirement before determining the scope and special format for the projects subject to the EIA process. Accordingly, in EIA Regulation Article 9, the provision "to inform the public about the investment and to receive their opinions and suggestions regarding the project; The Public Participation Meeting is organized in an central place that is accessible for the local people which is determined by the governorship, at the date and time determined by the MoEU, with the participation of organizations qualified by the Ministry of Environment, Urbanization and Climate Change ("MoEU") and the project owner." takes place.

During the review and assessment meetings, reviews and evaluations are made by the Commission on whether there is a solution to the opinions and suggestions raised by the local people and the society during the public participation meeting and other stages of the process.

The EIA Report, which is reviewed and finalized by the Commission, is opened for publication by the MoEU and/or the governor's office for ten calendar days to receive public opinion and suggestions. In the decision-making process related to the project, MoEU also evaluates the opinions received at this stage.

In this context, if a deficiency is found in the content of the report in line with the opinions of the public, it may be requested to complete these deficiencies, carry out additional studies, or to re-gather the commission.

Afterward, the "EIA Positive" or "EIA Negative" decision is made about the project and is announced to the public by the MoEU and the relevant Governorship through a written announcement and official website.

The Provincial Directorate of Environment, Urbanization and Climate Change of Tekirdağ Governorship has approved the "Project Introduction Report (PIR)" of the capacity increment Project and as a result, the "EIA is not necessary" decision has been given to the Project by Tekirdağ Governorship on 06.04.2020. The mentioned decision is shared in Annex-2.

3.1.5 Official Grievance Channels

In accordance with the Law on Exercise of Right to Petition, stakeholders can inform their requests, suggestions and grievances related to Project by making application from Presidential Communication Center (“CIMER”) which is operating under Presidency of Communication. Stakeholders can submit their applications through the CIMER internet address (<https://www.cimer.gov.tr>) or by calling the Alo 150 Direct Presidency line.

Similarly, grievances and/or suggestions regarding the activities within the scope of the Project can be made by filling the contact forms on the websites of Tekirdağ Municipality and Ergene-1 OIZ Management as well as the Provincial Directorate of Environment and Urbanization. Contact information of the relevant governmental institutions and municipalities is presented in Table A3-1 in Annex-3.

3.2 International Standards

IFC PS1 sets out the general framework for stakeholder engagement and the establishment of a Grievance Redress Mechanism. According to IFC PS1, stakeholder involvement is essential to establish strong, constructive and responsive relationships which are necessary to successfully manage the environmental and social impacts of a project.

Stakeholder engagement is a continuous process. Stakeholder engagement consists of analyzing and planning stakeholders, informing the stakeholders, providing consultation and participation, establishing a Grievance Redress Mechanism and providing continuous information and reports to affected communities, although their degree of impact varies. Although the types, frequency and level of effort of stakeholder engagement vary considerably, the activities to be carried out in this context should be commensurate with the stage (such as construction, operation) and possible risks and potential negative impacts.

The main requirements for the stakeholder engagement process in accordance with international standards are as follows:

- Identification of stakeholders.
- Sharing the necessary information with the communities affected or likely to be affected by the Project due to the activities during the capacity increment phase of the Project.
- Preparing and implementing a grievance mechanism.

Similarly, “Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Developing Countries” prepared by IFC defines the main components of the stakeholder engagement process as follows:

- Analysis of the stakeholders and planning their participations.
- Information sharing, reporting to stakeholders and consultations.
- Negotiations and partnerships.
- Participation of the stakeholders to the project follow-up.
- Grievance management.
- Other management functions.

4 ROLES AND RESPONSIBILITIES

Sistem Aluminium will take full responsibility, including the organization of the entire process within the scope of stakeholder engagement and grievance redress mechanism, ensuring communication with stakeholders, receiving requests and/or grievances from stakeholders, and responding to these requests and grievances. The general duties and responsibilities determined for the effective implementation of the stakeholder engagement process and the grievance redress mechanism are presented in Table 4-1.

Table 4-1: Roles and Responsibilities within the scope of SEP Applications

Roles	Duties and Responsibilities
Project Manager	<ul style="list-style-type: none"> • Ensuring that sufficient resources are allocated to effectively implement the SEP and GRM during the capacity increment period of the Project. • Ensuring that grievances and/or suggestions from external and internal stakeholders are collected, recorded and responded. • Ensuring effective and regular communication with the stakeholders • Organizing stakeholder engagement meetings and interviews. • Sharing information regarding the Project. • Conducting consultation activities
OHS Specialist and Environmental Engineer	<ul style="list-style-type: none"> • Providing information and/or reporting to the Project Manager about the practices of the SEP and the GRM. • Reviewing the grievance database regularly. • Reviewing grievances from stakeholders and responding to incoming grievances with reasonable timing. • Ensuring the application of SEP by subcontractors. • Ensuring that internal grievances are recorded and responded. • Providing trainings to Sistem Aluminium employees and subcontractors on practices under the SEP and GRM.

Project Managers, OHS Specialists, and Environmental Experts are responsible for the establishment and application of the stakeholder engagement and grievance redress mechanism. However, in Sistem Aluminium, there are additional personnel besides these, and they have also duties regarding the SEP and GRM applications. These additional specific roles and responsibilities will be mentioned in the following sections.

5 IDENTIFICATION OF STAKEHOLDERS

Individuals, groups, and institutions/organizations that are affected by the project activities and performance or can affect these processes or have a legal relationship with the Project are considered stakeholders.

Identifying stakeholders in the early stages of the Project is a key step in the stakeholder engagement process. The main purpose of identifying stakeholders is to give priority to the people, groups, and institutions by defining those people, groups, and institutions that may be directly or indirectly affected by the Project and may be related to the Project. In this framework, individuals and groups that may be affected by the Project have special importance due to their disadvantages and/or vulnerability.

Stakeholders determined within the scope of the Project are presented in Table 5-1. Among these stakeholders, stakeholders except the Company Group are evaluated as External Stakeholders. In addition, within the scope of the Project, Civil Society Organizations, Universities, and Media are defined as indirect stakeholders; while, Local Communities, Government Institutions and Organizations, Local Government Organizations, Neighboring Facilities, Credit Institutions, and Company groups are determined as primary stakeholders (direct stakeholders).

Table 5-1: Stakeholder Groups Determined within the Scope of the Project

Stakeholder Group	Stakeholders	Relation with the Project
Ecosystem	<ul style="list-style-type: none"> • Flora and fauna species in the Project Area and its immediate surroundings 	<ul style="list-style-type: none"> • Protection and monitoring of biodiversity elements in the Project Area and its immediate surroundings during the activities to be carried out during the capacity increment period of the Project.
Government Institutions and Organizations	<ul style="list-style-type: none"> • Ministry of Environment and Urbanization • Energy and Natural Resources Ministry • Ministry of Agriculture and Forestry • General Directorate of Nature Conservation and National Parks • Ministry of Family, Labor and Social Services • Ministry of Transportation and Infrastructure • Ministry of Health • Ministry of Culture and Tourism • Ministry of Treasury and Finance 	<ul style="list-style-type: none"> • Policy making • Permits and licences that should be taken within the scope of the project • Protection of the health and safety of employees and their local communities • Protection of the environment • Protection of cultural heritage • Protection of biological diversity • Permits that should be taken regarding the land usage • Obtaining the necessary permissions on issues related to transportation • Operation and maintenance of the Infrastructure Services and Energy Transmission Lines • Prevention of the spread of infectious diseases and protection of public health
Local Government Organizations	<ul style="list-style-type: none"> • Tekirdağ Governorship Provincial Directorate of Environment and Urbanization 	<ul style="list-style-type: none"> • Getting the necessary permissions within the scope of the project • Managing project environmental impacts (such as

Stakeholder Group	Stakeholders	Relation with the Project
	<ul style="list-style-type: none"> • Tekirdağ Governorship Provincial Directorate of Agriculture and Forestry • Tekirdağ Cultural Heritage Conservation Regional Board Directorate • Tekirdağ Provincial Health Directorate • Tekirdağ Municipality • Tekirdağ Provincial Gendarmerie Command • Ergene-1 OIZ 	<ul style="list-style-type: none"> • waste and wastewater) and environmental audits • Permits that should be taken regarding the land usage • Prevention of the spread of infectious diseases • Protection of workers health and public health and safety • Consultation on the procedures to be done for the protection of cultural assets in case of incidental finding • Communication in case of an emergency • Safety
Neighboring Facilities	<ul style="list-style-type: none"> • Data Paint Factory • Bilkont Textile Factory • Megapol Curtain Factory 	<ul style="list-style-type: none"> • Co-operation in case of any emergency situation. • Managing the grievances related to the cumulative effects of the neighboring facilities.
University	Tekirdağ Namık Kemal University	Getting technical support when it is necessary is optional.
Civil Society Organization (CSO)	<ul style="list-style-type: none"> • Turkish Aluminum Industrialists Association (TALSAD) • Environmental Protection and Packaging Waste Evaluation Foundation (ÇEVKO) 	Negotiations and technical support on environmental and social impacts, economic development and employment issues
Credit Institutions	International Financial Institutions and Private Banks (TKYB and international resources associated with TKYB)	Project Finance
Media	<ul style="list-style-type: none"> • Local and national newspapers • Social Media 	Information sharing and advertising studies about the Project
Company Group	<ul style="list-style-type: none"> • Project employees (1053 men and 110 women) • Subcontractors 	<ul style="list-style-type: none"> • Project Environmental and Social Management System applications • Employment • Workforce and management

Contact information of the primary stakeholders is shared in Table A3-1 and Table A5-1 in Annex-3. Map showing the neighboring facilities is given in Figure A5-1 in Annex-3. Sistem Aluminium provides all the necessary information related to the stakeholders and defines all the communication ways with the stakeholders in the scope of the stakeholder engagement plan. Sistem Aluminium will maintain the engagement of the identified stakeholders by using the information-sharing methods and grievance redress mechanisms that are mentioned in the following sections.

6 INFORMATION TOOLS AND METHODS

Sharing information regarding the Project helps local communities and other stakeholders understand the opportunities as well as the risks and impacts associated with the project. In this way, stakeholders are ensured to have access to information such as (i) The purpose, feature, and scale of the Project; (ii) duration of the proposed project activities; (iii) risks and potential impacts on the communities in question and mitigation measures taken against them; (iv) the envisaged stakeholder engagement process; and (v) grievance redress mechanism.

Sistem Aluminium will use communication tools such as media, corporate web site, brochure, information notes, correspondances, announcements, regular meetings, face to face interviews and other informative activities in order to make consistent and transparent and timely informing to the local communities, company employees and other stakeholders. In this context, Sistem Aluminium shares up-to-date information and documents related to the Project on its corporate website (see: sistem@sistemal.com).

Documents such as Environmental and Social Action Plan, Environmental and Social Management Plan, SEP, Grievance Redress Mechanism etc. prepared for the Project will be kept on the website. In addition, Sistem Aluminium website contains materials that provide information about the different stages of the Project, and stakeholders are constantly informed about the Project on the website.

When stakeholders are exposed to risk and negative impacts due to the activities under the Project, a consultation process will be carried out to ensure that stakeholders express their views, and the Project Owner can respond by evaluating these views. The consultation process will be commensurate with the project risks, negative impacts and concerns raised by the stakeholders. The issues listed below will be considered for an effective consultation process:

- The consultation process will be initiated during the capacity increment period where environmental and social risks and impacts are determined and will be repeated as risks and impacts occur.
- The information shared during the consultation process will be transparent, objective, meaningful and easily accessible in a simplified, appropriate format that local communities can understand.
- The consultation process will focus on the groups that are directly affected by the Project (especially internal stakeholders) rather than indirectly affected stakeholders.
- In order to manage the process well, it will be ensured that there is no external orientation, intervention and compelling.
- Outputs related to this process will be recorded.

In case of any grievances from stakeholders, Sistem Aluminium will respond to the demands, comments, and questions of local communities implicitly and in time by implementation of the grievance redress mechanism. All requests will be treated by having respect. When it is not possible to fulfill a specific request, stakeholders will be given a detailed explanation of why this is not possible, with the help of social plans. Details are given in the next section.

7 GRIEVANCE REDRESS MECHANISM

A Grievance Redress Mechanism will be established within the scope of the Project in order to learn about the concerns and grievances of employees and external stakeholders regarding the environmental and social performance of the Project and to help them eliminate them. In this process, possible risks and possible negative impacts of the Project were taken into consideration.

The Grievance Redress Mechanism aims to promptly address the concerns that stakeholders may have, using a culturally appropriate, transparent, and understandable consultation process. The party expressing its concern or grievance will not face any cost or sanction.

The Grievance Redress Mechanism does not constitute an obstacle to resorting to legal or administrative remedies. Stakeholders and affected communities will be informed about the Grievance Redress Mechanism during the stakeholder engagement process.

In order to effectively implement the Grievance Redress Mechanism, the general steps given below are necessary to be followed:

- Grievance Redress Mechanism is prepared by taking into consideration the environmental and social risks and possible impacts of the Project.
- The process should be design in a way that it is easily clear, accessible, confidential, and appropriate in cultural manners
- Employees and external stakeholders will be provided with information about where, to whom and how to deliver their grievances.
- A response time related to incoming grievances will be determined (for example 15 days) and this time will be adhered to.
- By giving feedback to local communities, employees and other stakeholders, the actions taken regarding their concerns and grievances and the results of these actions will be explained.
- Necessary records will be kept regarding all transactions and reported annually to TKYB.

In the scope of the ESAP studies of the Project, Project Site was visited on 15,16 March 2022. During this site visit, the existing situation regarding the stakeholder relations and grievance redress operations were assessed. At the end of the assessment, the most applicable grievance redress mechanism for the Project has been created. This mechanism contains three parts that are mentioned below.

- Internal/External Ethic and Discipline Records
- Internal Suggestion Assessment
- External Grievance Redress

7.1 Internal/External Ethic and Discipline Records

Internal or external grievances including business ethics and discipline will be collected separately by "Ethics Committee" of Sistem Aluminium. For notifications, the following e-mail, phone and mobile phone or the members of the Ethics Committee can be contacted directly.

("Ethics Committee Working Order" document has been claimed from Sistem Aluminium authorities during the site visit and information has been obtained from that document.)

Table 7-1: Business Ethics and Discipline Rule Violation Notification Channel

Communication Channels	
Web Address	http://www.sistemaluminum.com.tr/tr/iletisim.php
Extension	3845
Mobile Phone	05353412043

When making a grievance notification via e-mail on the website, "Ethics" is selected from the subject section of the contact form. Although not required; name, surname, phone number, and e-mail information can also be entered. An e-mail is sent by entering the ethical violation description in the "Your Message" section and clicking the "Send" button.

Grievance notifications reach the Center of Excellence Director. The names of the grievance owner are kept confidential unless the grievance owner requests it by the Center of Excellence Director.

This committee consists of the following staff.

- Chief Executive Officer
- Deputy Chief Executive Officer
- Human Resources Senior Manager
- Supply Chain Director
- Production Director
- Center of Excellence Director
- Accounting Manager
- Sales Managers
- Finance manager
- QMS Specialist

Chief Executive Officer leads the meetings. Persons deemed suitable by the Center of Excellence Director or board members also attend the meeting. The rapporteur of the board is the QMS Specialist.

Ethics Committee decisions are taken by majority vote. In cases where a majority of votes cannot be achieved, the decision taken by the Chairman of the Disciplinary Board is implemented.

Ethics Committee meetings should be held regularly, and grievances should be replied to within 15 days.

7.2 Internal Suggestion Assessment

Employees of Sistem Aluminium are encouraged to make suggestions for improving the quality of the production and working environment. In this regard, the steps that are mentioned below are followed in order to evaluate and apply the suggestions.

- Employees records their suggestion via an internal system or kiosk in the tea-break area.
- A board evaluates these suggestions. The mentioned board includes OHS, environment, and industrial experts and evaluates the suggestions whether they are applicable or not.
- If a suggestion is evaluated as not applicable, the suggestion owner will be notified. Otherwise, feasibility studies are carried out regarding the suggestion, and a presentation of the suggestion is created.
- Detailed chart of the internal suggestion system is given in Annex-4.

System Aluminium has developed a scoring system for the suggestions. All the suggestions that come from the employees are scored and employees are rewarded with gifts (cell phones, laptops, etc.) according to their scores. By means of this scoring system of Sistem Aluminium, employees are encouraged to make suggestions for improving the quality of the production and working environment. During the site visits, it is reported that a reward ceremony is held annually in this regard.

In order to receive internal grievances (including suggestions, complaints, etc.), grievance boxes should be placed at places on the Project Site that employees can easily reach. In areas where there are grievance boxes, no image or video recording be advised.

7.3 External Grievance Redress

External grievances will be collected, recorded and evaluated as the way it is stated below:

- Upon the receipt of the grievances, the process will be initiated by the Project Management, OHS Expert or Environmental Engineer, depending on the type of grievance.
- Incoming grievances will be recorded in the database and reported annually to TKYB.
- The grievance will be directed to the relevant department and a preliminary assessment will be made on the subject.
- Actions and measures necessary for the resolution of the grievance will be determined and implemented.
- If the grievance owner has indicated the name and contact information in the grievance forms, he/she will be informed within five workdays after the start of the process. Likewise, if the grievance is resolved, the person making the grievance will be informed within maximum 15 workdays.
- After the grievances are resolved by reaching an agreement with the grievance owner, the grievance will be closed by the responsible person.
- If the grievances cannot be resolved within a specified time for a reason, the parties making the grievance will be explained and information about the time extension will be provided.
- SEP+GRM Report should be uploaded to the webpage of Sistem Aluminium. With the external grievance form in SEP+GRM Report, applications through the website

can be received and stakeholders will be informed about grievance redress mechanism.

- Grievance/suggestion form should be placed in the security points at the entrance of the Facility and management building of Ergene OIZ-1 as well as website in order for being used by external stakeholders.
- Information about the locations of the grievance/suggestion boxes and how to convey their grievances will be provided to stakeholders.
- External grievance form is given in Annex-5.

The Grievance Redress Mechanism flow chart for external stakeholders is shown in Figure 7-1.

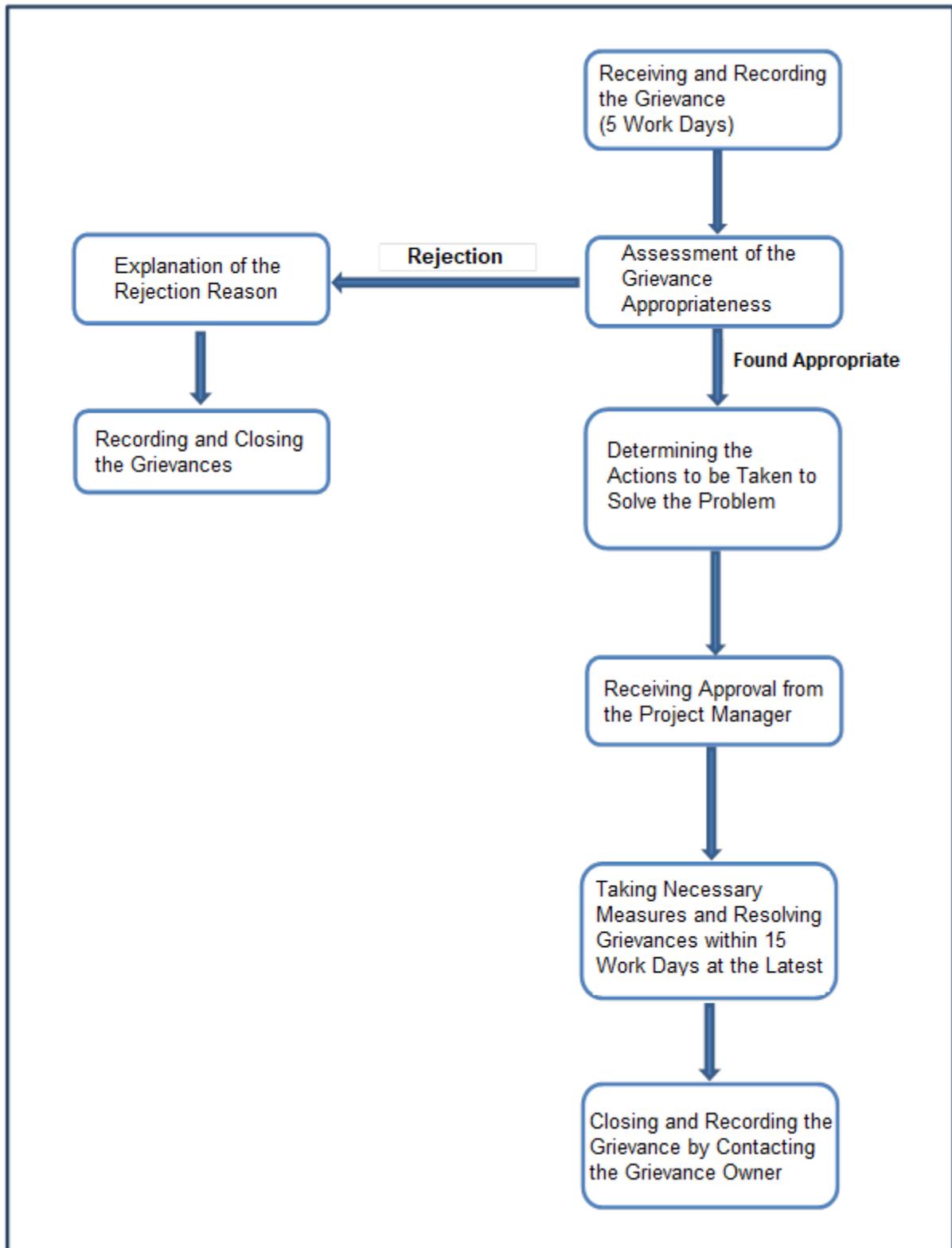


Figure 7-1: Flow Chart of the External Grievance Redress Mechanism

8 MONITORING, REPORTING AND TRAINING

The stakeholder engagement process and the grievance redress mechanism will be regularly reviewed by Sistem Aluminium during the Project capacity increment period, and practices carried out in this context will be monitored. In addition, the feedback from stakeholders will be evaluated and stakeholders will be involved in the monitoring processes. During the monitoring activities, stakeholders will be questioned about the following items.

- Transparency of the accession process.
- Whether the information about the Project is provided or not.
- Whether grievances are answered in a timely manner.
- The clarity, applicability, and validity of the shared information.

In the process of monitoring the effectiveness of Stakeholder Engagement and Grievance Redress Mechanism, key performance indicators should be determined, and monitoring activities should be based on those indicators.

Performance indicators will be monitored through grievance registrations and reports. In this context, the performance indicators applicable for the Project are listed below:

- A decrease to be seen in the number of grievances coming from the stakeholders.
- Providing regular feedback to stakeholders on the implementation of the Grievance Redress Mechanism and closed cases.
- Number of resolved grievances.
- Conducting regular audits (once a year during the capacity increment period) to ensure that the Grievance Redress Mechanism is implemented.

Compliance with the SEP and GRM will be periodically audited by Sistem Aluminium management, TKYB and associated international institutions. Subcontractors will also be regularly audited by Sistem Aluminium in line with Project Standards and SEP+GRM requirements. In this process, regular records will be kept on the issues listed below:

- Consultation meetings.
- Stakeholder interviews.
- Internal and external suggestions/grievances received, and studies carried out in this context.
- Correspondences and informative studies (brochures etc.)
- Audit and monitoring reports.

Information on the Grievance Redress Mechanism will be provided to Project employees and subcontractors within the scope of recruitment training. In addition, staff who are responsible for the stakeholder engagement process will also be provided with special training on the job and the subject.

9 STAKEHOLDER ENGAGEMENT PROGRAM

The purpose of stakeholder engagement is to ensure continuous communication with the stakeholders for giving information about the activities to be conducted in the capacity increment stage including the Project development and investment plan and their applications. Information to be shared with the stakeholders during the stakeholder engagement process, communication methods and tools to be used, stakeholder groups and responsible people are presented in the program in Table 9-1.

The stakeholder engagement program will be reviewed and revised based on the project performance requirements and feedbacks from stakeholders.

A site visit was held on 15,16 March 2022 and interviews were held with the internal stakeholders. In addition, external stakeholders have been identified and contact information of them has been recorded during the site visit studies. (Kindly check Annex-3)

An environment where stakeholders can easily express their concerns was provided at the meetings. Questions from stakeholders were answered and comments specified were recorded.

Detailed information regarding the stakeholder interviews is given in the next section.

Regular consultations and meetings will be held to involve the project employees and subcontractors in the stakeholder engagement process, to inform the employees about the progress of the Project, to transfer the internal grievance mechanism, and to get the opinions of the employees. On 15,16 March 2022, these kinds of consultations were accomplished as internal stakeholder interviews and meetings will be repeated during the environmental and social monitoring studies.

Table 9-1: Stakeholder Engagement Program

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents to be Shared with Stakeholders	Communication Tools and Methods	Responsibles
Company Group	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> Regular meetings which will be conducted monthly periods for evaluating the grievances and suggestions. In case of any grievance and/or suggestion from employee. Yearly interviews with the employees in the scope of environmental and social monitoring. 	<ul style="list-style-type: none"> Environmental and Social Action Plan Environmental and Social Management Plan Stakeholder Engagement Plan Grievance Redress Mechanism and Grievance Forms (Internal Grievances) Awareness raising studies and trainings Training documents OHS procedure and plans Procedure and plans on the management of environmental impacts Project schedule and planning Annual activity reports 	<ul style="list-style-type: none"> Regular meetings Correspondence and phone calls Workforce audits / revision studies OHS meetings Internal Grievance Forms Grievance boxes and information notes in the Project Site 	<ul style="list-style-type: none"> Project Management OHS Specialist Environmental Engineer Subcontractors
Government Institutions and Organizations / Local Government Organizations	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> When permission is required from the governmental institutions/organizations within the scope of the Project When it is necessary to apply to governmental institutions/organizations within the scope of the Project In case of supervision by governmental institutions/organization In case of grievances and/or suggestions from government institutions/organizations 	<ul style="list-style-type: none"> Project schedule and planning Annual activity reports Documents required within the scope of permits to be obtained 	<ul style="list-style-type: none"> Company web site Correspondence and phone calls 	<ul style="list-style-type: none"> Project Management OHS Specialist Environmental Engineer

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents to be Shared with Stakeholders	Communication Tools and Methods	Responsibles
Universities	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> When consultancy on technical issues is required within the scope of the Project 	<ul style="list-style-type: none"> Technical information about the Project 	<ul style="list-style-type: none"> Correspondence 	Project Management
Civil Society Organization (CSO)	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> If necessary In case of grievances and/or suggestions from CSOs 	<ul style="list-style-type: none"> Environmental and Social Action Plan Environmental and Social Management Plan Stakeholder Engagement Plan Grievance Redress Mechanism and Grievance Forms 	<ul style="list-style-type: none"> Company web site Informative notices and brochures Correspondence and phone calls External Grievance Forms 	Project Management
Credit Institutions	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> During the annual Monitoring Meetings with credit institutions during the construction and operation periods of the Project In case of need to share information/documents about the Project 	<ul style="list-style-type: none"> Environmental and Social Action Plan Environmental and Social Management Plan Stakeholder Engagement Plan Grievance Redress Mechanism and Grievance Forms Environmental monitoring reports about the Project Annual activity reports on the environmental and social performance of the Project 	<ul style="list-style-type: none"> Company web site Regular meetings Correspondence and phone calls External Grievance Forms 	<ul style="list-style-type: none"> Project Management OHS Specialist Environmental Engineer
Neighboring Facilities	<ul style="list-style-type: none"> Capacity Increment (setup and operation) 	<ul style="list-style-type: none"> In case of any grievances and/or suggestions from the management of the facilities. 	<ul style="list-style-type: none"> Environmental and Social Action Plan Environmental and Social Management Plan Stakeholder Engagement Plan Grievance Redress Mechanism and Grievance Forms 	<ul style="list-style-type: none"> Company web site Informative notices and brochures Correspondence and phone calls External Grievance Forms 	<ul style="list-style-type: none"> Project Management OHS Specialist Environmental Engineer

10 STAKEHOLDER INTERVIEWS

A site visit was held on 15,16 March 2022 in order to prepare the plans and reports that are defined in the environmental and social action plan of the Project. These plans and reports are given below.

- Waste Management Plan (“WMP”),
- Water and Wastewater Management Plan (“ENMP”),
- Occupational Health and Safety Management Plan (“OHSMP”) and Emergency Response Plan (“ERP”),
- Air Quality and Greenhouse Gas Management Plan (“BMP”),
- Hazardous Material Management Plan (“HMMP”),
- Stakeholder Engagement Plan and Grievance Redress Mechanism (“SEP+GRM”).

On the first day of the site visit, an opening meeting was held with the participation of the Sistem Aluminium authorities. The meeting was held in the Facility. During this meeting, Sistem Aluminium authorities were informed about creating the mentioned plan and reports. In addition to environmental and social subjects, information regarding the current situation of the stakeholder engagement and grievance redress mechanism in the Facility was investigated. The participants of the meeting are given in Table 10-1. A photo from the opening meeting is shared in Annex-6 (Photo #1).

Table 10-1: Site Visit Opening Meeting Participants

Participants	
Name & Surname	Position
Aysun Aksu	Sistem Aluminium - OHS Specialist
Büşra Güçlü	Sistem Aluminium - Environmental Engineer
Seda Kalyoncu	Sistem Aluminium - QMS Specialist
Mustafa Meftun Öztoprak	Sistem Aluminium - Lean Office Manager
Deniz Çağlar	DOKAY- Environmental Engineer and OHS Expert
Pelin Bekri	DOKAY- Sociologist
Berat Batuhan Kaplangı	DOKAY- Environmental Engineer

During the site visit, interviews were held with the staff of the Sistem Aluminium randomly, simultaneously, and anonymously in order to create an objective and transparent environment in the interviews. They were asked questions related to their satisfaction with the working conditions in the facility and their awareness of the existing stakeholder engagement and grievance redress mechanisms of the Sistem Aluminium. During the interviews, staff has been informed regarding the environmental and social studies within the scope of the Project; especially about this SEP+GRM.

Brief information regarding the opinions of the staff that are interviewed during the site visit is given in Table 10-2. Photos taken during the interviews are shared in Annex-6 (Photo #2 - #6).

Table 10-2: Notes from the Internal Stakeholder Interviews

Interviews	
Staff	Notes
A worker in the molding room department. (male)	He has been working in the Facility for 6 months. He mentioned that he is satisfied with the working conditions and that all the necessary pieces of equipment are provided for his working comfort as well as his health and safety. He shared information about the shifting system in his department and he mentioned that there are three shifts (08:00-16:00, 16:00-00:00, 00:00-08:00) and he is happy with the system. He added that he sometimes works overtime but he is always paid when this situation happens. He also mentioned that he is aware of the existing grievance redress mechanism in the facility.
A worker in the pressing room department. (male)	He has been working in the Facility for 7 years. He stated that he uses the service buses of the Facility for transportation. He mentioned that noise is a problem in the working environment however, he added that ear-protecting pieces of equipment are provided for them. He mentioned that he is working for 8 hours a day. In addition to that, he mentioned that he is working overtime seldom, but he is always paid for it when this situation happens. He also mentioned that he is aware of the existing grievance redress mechanism in the facility.
A worker in the dismantlement department. (female)	She has been working in the Facility for 4 years. She mentioned that all the necessary pieces of equipment are provided for her working comfort as well as her health and safety. She stated that she is satisfied with the working hours and conditions. She mentioned that she is aware of the existing grievance redress mechanism in the facility and when she has any suggestion or complaint, she uses this mechanism.
A worker in the quality control department (female)	She has been working in the Facility for 2 years. She mentioned that all the basic necessities (transportation, food, etc.), as well as pieces of working equipment, are met by Sistem Aluminium. She stated that the existing grievance redress mechanism and suggestion evaluation mechanism in the Facility answer her suggestion and complaints fast and in a respectful manner.
A worker in the quality control department (female)	She has been working in the Facility for 2.5 years. She mentioned that all the necessary OHS trainings are given to her during the recruitment period by Sistem Aluminium. She stated that the existing grievance redress mechanism and suggestion evaluation mechanism in the Facility is working.
A worker in the water treatment plant (male)	He has been working in the Facility for 4 years. He shared information about the shifting system in his department and he mentioned that he is working for 8 hours a day. He added that he sometimes works overtime but he is always paid when this situation happens. He also mentioned that he is aware of the existing grievance redress mechanism in the facility and this mechanism responds to his suggestions and complaints fast.

In addition to the internal stakeholder interviews, an interview was held with the Manager of the Wastewater Treatment Plant of Ergene-1 OIZ, Oğuz Albayrak. He has visited in the Wastewater Treatment Plant, with the participation of Büşra Güçlü. During the interview, information on WWTP was obtained and stakeholder relation between Sistem Aluminium and Ergene-1 OIZ WWTP was investigated. In the interview, Oğuz Albayrak stated that there has been not any problem observed in WWTP due to the wastewater of Sistem Aluminium. He stated that all the communication tools are known by both sides in terms of using them for sharing their suggestion and complaints with each other when it is necessary. A photo of the interview is shared in Annex-6 (Photo #7).

11 CONCLUDING REMARKS

DOKAY has held site visit studies in Sistem Aluminium Facility on 15,16 March 2022. During the studies, Project has been investigated in environmental and social aspects. In the scope of the Stakeholder Engagement Plan and Grievance Redress Mechanism, current applications of Sistem Aluminium have been identified. All the stakeholders have been defined and interviews have been held with the internal stakeholders in order to check the current applications and inform the employees regarding the stakeholder engagement activities, especially the grievance redress mechanism of the Project.

It can be concluded from the information gathered during the meetings with the authorities of the Project and interviews with the stakeholder that, current grievance redress mechanisms and stakeholder engagement activities are known by internal stakeholders and employees can share their suggestions and grievances easily.

During the site visits, it has been reported by the authorities of Sistem Aluminium that, no cases or grievances regarding the stakeholder engagement had been recorded. By means of this report, all the contact tools with the internal and external stakeholders are defined; and a comprehensive stakeholder engagement and grievance redress mechanism have been established. Therefore, cases or grievances can be managed effectively by this SEP+GRM.

In the scope of the environmental and social action plan of the Project, environmental and social monitoring studies will be held. During the capacity increment phase of Sistem Aluminium, two environmental and social monitoring studies will be accomplished. In this regard, the implementation of SEP+GRM will be monitored during these studies and constructive action will be taken in order to adapt this SEP+GRM to current situations in the future.

ANNEXES

ANNEX-1: Satellite Image of the Facility



ANNEX-2: "EIA is not necessary" Decision of the Project


T.C.
ÇEVRE ve ŞEHİRCİLİK BAKANLIĞI
Çevresel Etki Değerlendirmesi, İzin ve Denetim Genel Müdürlüğü



T.C.
TEKİRDAĞ VALİLİĞİ
ÇEVRE ve ŞEHİRCİLİK İL MÜDÜRLÜĞÜ

Karar Tarihi : 06-04-2020
Karar No : 53549773 220-02 E-202077

ÇEVRESEL ETKİ DEĞERLENDİRME BELGESİ

25.11.2014 tarih ve 29186 sayılı Resmî Gazete’de yayımlanarak yürürlüğe giren Çevresel Etki Değerlendirmesi Yönetmeliği’nin Ek-II listesinde yer alan '**Alüminyum Ergitme, Döküm, Kaplama, Boyama, Profil Üretimi ve Hurda Metal Geri Kazanımı Kapasite Artışı**' projesi ile ilgili olarak inceleme-değerlendirme yapılmış ve Proje Tanıtım Dosyasında çevresel etkilere karşı alınması öngörülen önlemler yeterli görülmüştür. Ayrıca CED Raporu hazırlanmasına gerek bulunmadığı tespit edilmiş olup, söz konusu projeye CED Yönetmeliğinin 17. Maddesi gereğince Valiliğimizce "**Çevresel Etki Değerlendirmesi Gerekli Değildir**" kararı verilmiştir.


Murat EREN
Vali a.
Vali Yardımcısı

Proje Sahibi : **SİSTEM ALÜMİNYUM SAN. VE TİC. A.Ş. ÇORLU ŞUBESİ**
Proje Yeri : Tekirdağ İli, Ergene İlçesi, Vakıflar OSB Mah. Ergene 1 OSB, F19a23a3c ve F19a23b4d Pafta, 340 Ada. 7, 6, 3 ve 1 nolu parseller, 116.156,05 m2
Kapasite : Kapasite bilgileri arka sayfadadır.

Üretim Konusu	CED Kapasitesi 3 vardiya/24 saat	Mevcut Üretim Kapasitesi 3 vardiya/24 saat	Nihai Durum Üretim Kapasitesi 3 vardiya/24 saat
Alüminyum Biyet (kendi üretiminde kullanılmaktadır) (<i>ergitme ve döküm kapasitesi</i>)	24.000 ton/yıl	23.328 ton/yıl*	239.112 ton/yıl
Muhtelif Alüminyum Profiller (Boyasız, statik toz boyalı, transfer kaplamalı ve eloksalı)	114.000 ton/yıl	51.822 ton/yıl	240.282 ton/yıl
-Elokstal kaplamalı Profil	36.000 ton/yıl	12.888 ton/yıl	72.000 ton/yıl
-Statik Kaplamalı Profil	30.000 ton/yıl	11.918,1 ton/yıl	72.000 ton/yıl
-Transfer Kaplamalı Profil	-	-	3.000 ton/yıl
Alüminyum Kompozit Levha	29.700 ton/yıl	26.985 ton/yıl	53.970 ton/yıl
Alüminyum Dövme Pres	-	7.050 ton/yıl	56.400 ton/yıl
Alüminyum Araç	10.000 ton/yıl	12.960 ton/yıl	60.071 ton/yıl
Tehlikesiz Atık Geri Kazanımı	4.000 ton/yıl	10.691,4 ton/yıl	90.104 ton/yıl
Elokstal Kaplama ve Yüzey Temizleme Havuz Hacimleri	2.206,4 m ³	1.934,168 m ³	4.316,524 m ³
Alüminyum Rulo Boyama (16.000.000 m ²)	10.110 ton/yıl	-	19.500 ton/yıl
Kauçuk Fital, Conta Üretimi	18.000.000 kg/yıl	-	18.000.000 kg/yıl
İnşaat ve Sanayi Cam İşleme	9.000.000 m ² /yıl	-	9.000.000 m ² /yıl
Plastik Granül Üretimi	-	-	17.280 ton/yıl
Kimyasal Depolama Hacı	-	480 m ³	480 m ³
YAKMA SİSTEMLERİ(ENERJİ SİSTEMLERİ)			
Kojenerasyon Tesisi	2.070 kW buhar gücü 3.495Kw/h elektrik gücü	-	2 x 12,5 =25 MWt 5 MWe 5.11 MWm
Buhar Kazanı	7,326 MW	4,826 MWt (2,326 +2,5)	4,826 MWt
Buhar kazanı(doğalgazlı)(ilave)	-	-	9 MWt
Kömür	7,797 MW	-	-
Toplam yakma ısı gücü(kojen-buhar k.)	18,618 MW	4,826 MWt	38,826 MWt**
Rüzgar Santrali(0,8 MW - 9 adet)	7,2 MW	-	7,2 MW
Güneş Kolektörü(0,8 MW - 9 adet)	7,2 MW	-	7,2 MW

*: Tesiste dökümhane bölümünde 2 vardiya olarak çalışmaktadır. Planlanan durumda 3 vardiya çalışma durumu göz önünde bulundurularak hesaplama yapılmıştır.

**Toplam ısı gücü hesaplanırken yakma sistemlerinin termal ısı (MWt) güçleri toplanmıştır.

ANNEX-3: Contact Information of the Stakeholders and Map Showing the Neighboring Facilities

Table A3-1: Contact Information of Governmental Institution and Municipalities

Relevant Institutes	Communication Channels
CIMER	Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe - Ankara Phone: 0 (312) 590 20 00 Website: https://www.cimer.gov.tr/ Phone: 150
Tekirdağ Municipality	Adress: Çınarlı Mah. Hayrabolu Cad. No:4 Süleymanpaşa/TEKİRDAĞ Communication Center: 0 850 459 59 59 E-mail: tbb@tekirdag.bel.tr Website: https://www.tekirdag.bel.tr/iletisim_bilgileri Phone to Report Wishes and Grievances: 153
Ergene-1 OIZ	Adress: Vakıflar OSB Mah. Sanayi Cad. Öztekin Sok. No: 5/1 Ergene/TEKİRDAĞ Telephone: +90 282 675 11 05 / +90 282 672 23 04 E-mail: info@ergene1osb.org Website: https://www.ergene1osb.org/iletisim/
Tekirdağ Provincial Directorate of Environment and Urbanization	Hürriyet Mahallesi Müjgan Kalelioğlu Caddesi No: 20 Süleymanpaşa/TEKİRDAĞ Phone: (0282) 261 20 40 E-Mail: tekirdag@csb.gov.tr

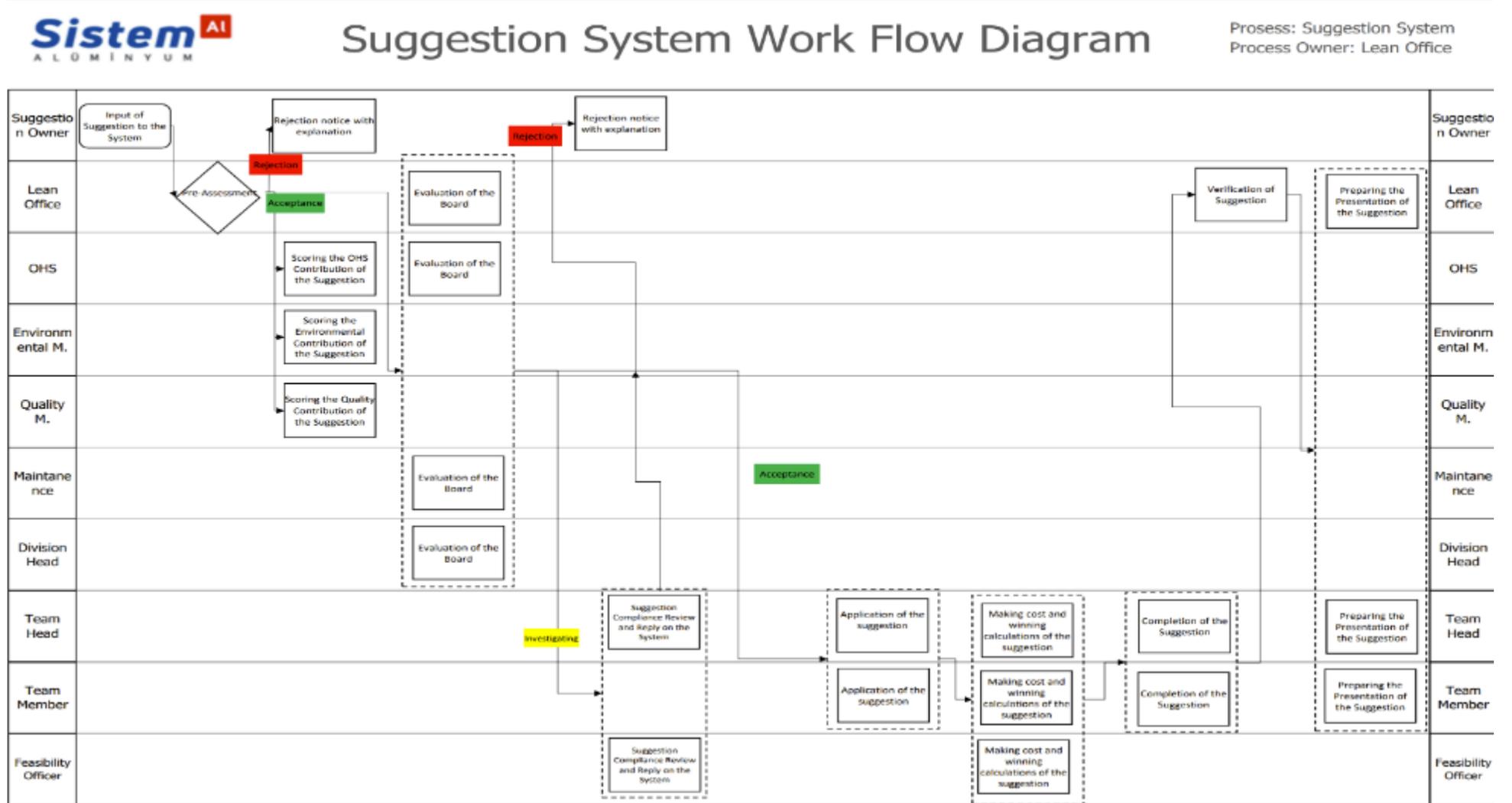
Table A5-1: Contact Information of Other Primary Stakeholders

Relevant Institutes	Communication Channels
Megapol Curtain Facility	Address: Ergene1 Osb Vakıflar Osb Mah. D 100 Cad. No:11 Ergene/Tekirdağ Phone: 0282 675 10 35 E-Mail: megapolull@hotmail.com
Bilkont Textile Facility	Adress: Misinli Köyü Kavşağı Asfalt Altı Mevkii E-5 Karayolu Üzeri, 59860 Çorlu- TEKİRDAĞ Phone: (0282) 675 13 00 E-mail: bilkontfabrika@bilkont.com.tr
Data Paint Facility	Address: E-5 Yolu Üzeri Fabrikalar No:23/A Ergene / Tekirdağ Telephone: 0 282 675 13 27
Turkish Aluminum Industrialists Association (TALSAD)	Address: Workinton Çalışma Ofisleri, Mahmutbey Mah. Taşocağı Yolu Caddesi Balance Güneşli Sitesi No:19/1 Bağcılar – İstanbul Phone: +90 (212) 320 92 17 – 18 E-Mail: talsad@talsad.org.tr
Environmental Protection and Packaging Waste Evaluation Foundation (ÇEVKO)	Address: Cenap Şahabettin Sok. No: 94 Koşuyolu 34718, Kadıköy, İstanbul/Türkiye Phone: (0216) 428 78 90 - 94 (4 Hat) E-mail: cevko@cevko.org.tr
Tekirdağ Namık Kemal University	Address: Silahtarağa Mah Üniversite 1.Sokak No: 13 Çorlu-Tekirdağ Phone: (0282) 250 2300 E-mail: corludekanlik@nku.edu.tr



Figure A5-1: Satellite Image of the Neighboring Facilities

ANNEX-4: Internal Suggestion System



ANNEX-5: External Grievance Form

EXTERNAL GRIEVANCE/SUGGESTION FORM	
Information of the Grievance Owner and/or Suggestion Owner (If you do not want to share your personal information, please leave it blank. Anonymous suggestions and grievances will also be considered.)	
Name and Surname:	
Date:	
Contact Information (Please mark how you would like to be contacted): Telephone: E-mail: Address:	
Name and Surname of the Person who Recorded the Grievance/Suggestion:	Date of the Grievance/Suggestion and Signature:
Details of the Grievance and/or Suggestion:	
Type of the Grievance/Suggestion:	
<input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Other	
Description of the Grievance/Suggestion (What happened? When did it happen? Where did it happen? What is the result of the problem?):	
Status of the Event which is the Subject of the Form:	
<input type="checkbox"/> One-time event <input type="checkbox"/> The problem happened more than once <input type="checkbox"/> The problem continues (If your answer is "YES", write the details)	
Recording and Feedback (To be filled in Sistem Aluminium):	
Grievance/Suggestion Record Number:	Grievance/Suggestion Date:
The Person and the Unit that Recorded the Grievance/Suggestion:	
Action to be Taken for the Grievance and/or Suggestion:	
To be Filled by Sistem Aluminium when the Grievance is Closed:	
The Name of the Person who Closed the Grievance, Date and Signature:	

ANNEX-6: Photographs that are Taken During the Stakeholder Interviews



Photo #1: Opening Meeting



Photo #2: Internal Stakeholder Interview-1



Photo #3: Internal Stakeholder Interview-2



Photo #4: Internal Stakeholder Interview-3



Photo #5: Internal Stakeholder Interview-4



Photo #6: Internal Stakeholder Interview-5



Photo #7: Interview with Ergene-1 OIZ WWTP Manager