



Final Report

Stakeholder Engagement Plan

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BEZTAŞ Operation Capital Investment Project

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Abbreviations

Aol	Area of Influence
DCC	Document Control Center
DOSAB	Demirtaş Organized Industrial Zone
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GD	General Directorate
GMP	Grievance Mechanism Procedure
HR	Human Resources
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Co. Ltd.
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	BEZTAŞ Operation Working Capital Investment Project
WB	World Bank

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for BEZTAŞ Operation Working Capital Investment Project with the reference number of BZT-PLN-SOC-001. This SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project according IFC Performance Standards (“PSs”) and, Development and Investment Bank of Turkey (TKYB) Environmental and Social Policy and World Bank Environmental and Social Standards (“ESSs”).

This is a dynamic document which is subjected to revisions and updates in case of the needs and changes of the Project.

1.1 Background

BEZTAŞ Group, founded in 1989 in Bursa, Turkey, is a fabric manufacturer proprietary company, supplying top fashion brands and retailers from all around the world. The Project is located in the Bursa Demirtaş Organized Industrial Zone, and involves weaving, knitting, dyeing, digital & rotary printing and finishing facilities. The company is specialized in the production of printed and plain fabrics, specifically cotton, viscose, polyester, poly-viscose, viscose blends, linen, and other soft apparels.

The details regarding the Project facilities processes are given in the following table.

Table 1-1. Processes performed in the facilities

Facility	Processes
BEZTAŞ No 5	<ul style="list-style-type: none"> • Dyehouse • Print Production • Quality Assurance Fabric Control
BEZTAŞ No 7	<ul style="list-style-type: none"> • Digital Print Production • Knit and Ram
BEZTAŞ Weaving	<ul style="list-style-type: none"> • Weaving

As it can be seen in Table 1-1, BEZTAŞ has three facilities in Demirtaş Organized Industrial Zone (DOSAB) in Bursa Province. The facilities BEZTAŞ No 5 and No 7 are located within the borders of Demirtaş Dumlupınar neighborhood and the Weaving facility is located within the borders of Alaşarköy neighborhood. The “Site Location Map” indicating the location of the facilities and the neighborhoods found in the close vicinity are given in the following Figure 1-1.



Figure 1-1. Existing BEZTAŞ facilities and nearest neighborhoods

1.2 Purpose and Scope

1.2.1 Purpose

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

- identify stakeholders and their interest to the Project,
- set out applicable management interfaces,
- define roles and responsibilities,
- outline the applicable project standards relevant to this Plan,
- define Project commitments, operational procedures and guidance relevant to this Plan,
- define monitoring and reporting procedures, including the key performance indicators (KPIs) of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,
- outline communication tools.

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

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

The other goal of this SEP is to describe the most effective methods by:

- keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.2.2 Scope

This Plan is applicable to all activities of the Project, including those associated facilities and all Contractors during operation phases of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

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

This Plan is a part of the environmental and social management plans developed for the Project. This Plan has overlaps and cross-linkages to Grievance Mechanism Procedure (GMP) (GMP-PLN-SOC-001) which is applied to all internal direct and indirect workers, customers, and external stakeholders, and all the other Environmental and Social Management Plans.

1.3 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	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.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally Appropriate	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	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.
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.
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.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Project Affected People	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.

Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Vulnerable People	People who by virtue of 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

Principle roles and responsibilities for the implementation of this Stakeholder Engagement Plan are explained in this section of the plan.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> Approves this Plan and resources required for implementation. Determines the policies and targets regarding the social communication and stakeholder engagement, Ensures this management plan is implemented during the lifetime of the Project. Ensures the facilities' compliance with the Project standards, and other requirements set out in the Management Plan. Provides necessary resources for proper implementation of this SEP and GMP. Make the final decision concerning internal / external grievances (if needed) in the light of the assessments of Social Responsibility Staff and HSE Department Chief. Determines the social budget of the project
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Coordinates with parties for proper implementation of this Plan, Report to the top management about system performance, Ensure national and international legislations / guidelines which are applicable to the Project activities are identified and tracked, Records all formal and informal engagement activities with local communities in Stakeholder Management System, Records all formal and informal internal grievances collected by the Operational Chiefs, Works in coordination with Operational Chiefs for monitoring and resolution of the internal grievances, Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports, Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, Forms relationships with the Project stakeholders, Organizes stakeholder meetings to collect the responses to grievances actively as required,

Roles	Responsibilities
	<ul style="list-style-type: none"> • Provides regular reporting back to the community on the management related to community grievances, • Determines and provides the necessary training materials for employees, • Implements the SEP and GMP. • Keeps the records of the complaints / suggestions in the Grievance Database with details (by who, date, status etc.), • Searches the causes of the grievance and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities, • Monitors all complaints and ensures that all complaints are resolved and closed, • Follows the results of complaint and report on a weekly, monthly, and annual basis, • Records and reports general and local employment rates and complaints, which are received or observed verbally, • Filling out the “Complaint Register Form & Consultation Form” (see Appendices A and B), • Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed),
Health, Safety and Environment (HSE) Department Chief	<ul style="list-style-type: none"> • Make periodic inspections of the performance of Contractors of its activities during operation phase, • Work in cooperation with other departments in order to determine targets for Environmental, Social and HS and resource efficiency issues, • Determines the national and international legislations that are applicable to the Project activities and informs the Operational Manager, • Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the installation stage and to audit the performance of the Contractors, • Provides answers to the OHS, environment and social grievances raised by employees, the local community, and local institutions, • Checks the Environmental records and performance reviews of Contractors.
Operational Chiefs	<ul style="list-style-type: none"> • Report the internal grievances to the SRS in order them to be recorded and resolved, • Provides regular reporting back to the employees on the management related to internal grievances, • Determines the training needs for employees and inform SRS and HSE Department Chief, • Searches the causes of the grievance and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the workers, • Monitors all complaints and ensures that all complaints are resolved and closed in coordination with SRS and HSE Department Chief, • Follows the results of complaint and report on a monthly basis to SRS.

Roles	Responsibilities
Document Control Center (DCC) Responsible	<ul style="list-style-type: none"> • Uploads all management plans, policies, training minutes, records and reports to Document Control Center and keeps this system up to date • Records and keeps up to date all permits and/or the results of measurements taken within the scope of the Project. • Makes documents accessible to all Project employees (including Contractor / Subcontractor employees)
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> • Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence, • Follows the rules listed in this SEP and other relevant Management System documentation of the Project. Complying with the requirements and standards of the grievance mechanism procedure.

3 NATIONAL AND INTERNATIONAL STANDARDS

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

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

3.1 Applicable National 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:

I. 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.

III. 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.

IV. 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.

V. Right of Petition

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

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

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

Labour Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of

his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

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

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

Overtime Work

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

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

Working Age and Prohibition of Child Employment

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

Unions and Collective Agreements Law

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

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 17 July 2008, no 26939) is defined which includes a limited public disclosure process.

3.2 Applicable International Standards

International standards to be observed by the Project are the IFC Performance Standards and WB Environmental and Social Standards. Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties having an effect on, having been affected by, and/or that may be affected by the activities and

implementations of the Project; and to develop an appropriate procedure to identify and confirm them

- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it
- To review this database in consultation with relevant parties
- To provide necessary information and consultancy services to all stakeholders in order to facilitate their required contributions on the environmental and social issues that may affect them
- To continuously protect respectful and constructive relations with stakeholders on the basis of mutual confidence and honesty, and by respecting the values of the stakeholders

Basic requirements of international standards and guidelines are given below:

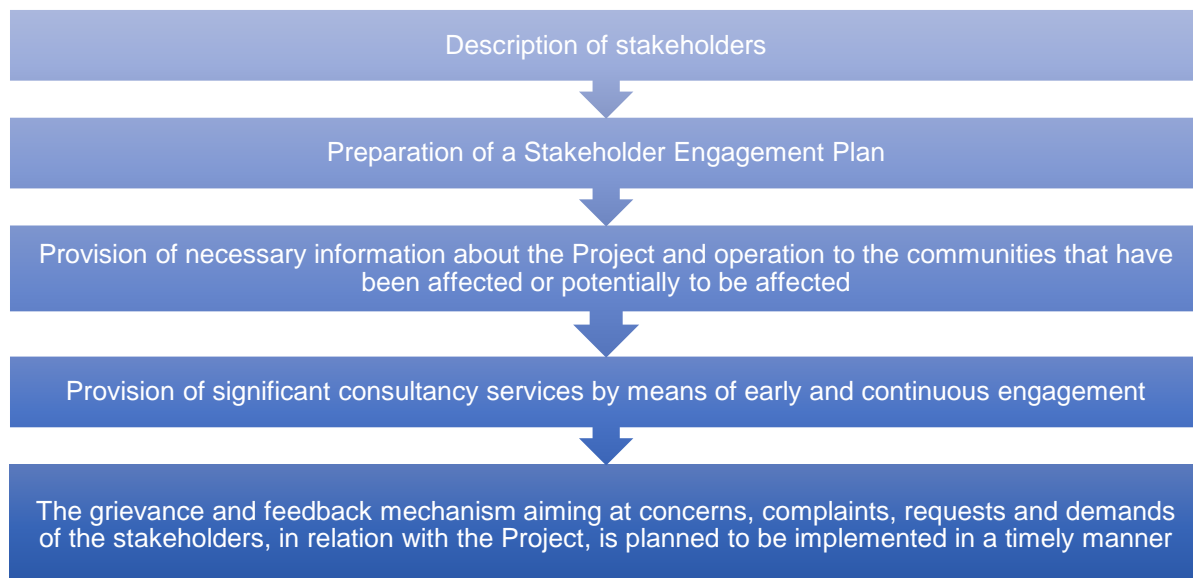


Figure 3-1: Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.2.1 World Bank Group Standards

World Bank Environmental and Social Standard 10 (ESS10), which is Stakeholder Engagement and Information Disclosure is the applicable international standard for the Project.

This ESS recognizes the importance of open and transparent engagement between the Project and Project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of the Project, enhance Project acceptance, and make a significant contribution to successful Project design and implementation. The objectives of this ESS are:

- To establish a systematic approach to stakeholder engagement that will help the Project identify stakeholders and build and maintain a constructive relationship with them, in particular Project-Affected Parties.

- To assess the level of stakeholder interest and support for the Project and to enable stakeholders' views to be taken into account in Project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the Project life cycle on issues that could potentially affect them.
- To ensure that appropriate Project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.

Moreover, the general requirements of ESS10, which the Project should meet, are explained below:

- The Project will engage with stakeholders throughout the Project life cycle, commencing such engagement as early as possible in the Project development process and in a timeframe that enables meaningful consultations with stakeholders on Project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential risks and impacts.
- The Project will engage in meaningful consultations with all stakeholders. The Project will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Project will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

In addition, the ESS10 includes the requirements for the stakeholder identification and analysis, stakeholder engagement plan, information disclosure, meaningful consultation, external reporting, grievance mechanism and organizational capacity and commitment.

3.2.2 IFC Performance Standards

The key requirements related to stakeholder engagement from IFC PS-1 are summarized below:

- An Environmental and Social Management System (“ESMS”) should be prepared and implemented, and the element of stakeholder engagement should be included.
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation (ICP) is to be conducted.

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

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

3.3 Project Standards

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

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

Within the scope of engagement activities, any official consultation meeting has not been conducted up to date. However, in the scope of the Environmental and Social studies performed by MGS, interviews and face-to-face meetings have been performed with mukhtars and several local governmental organizations on 15-16 November 2021. The aim of this meeting was to obtain information on the socio-economic structure of the region through specifically prepared surveys.

Also, within this scope, the following institutions have been visited and positive-negative views and recommendations have been obtained:

- Osmangazi Municipality
- General Directorate of Demirtaş Organized Industrial Zone
- Bursa Provincial Directorate of Environment and Urbanization
- Bursa Provincial Directorate of Agriculture and Forestry (via online phone call)

A summary of previous engagement activities for the Project is provided in the Table 4-1 below.

Table 4-1. Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Community	İdris Aydın Mukhtar of Alaşarköy Neighborhood	15.11.2021 Mukhtar's office	<ul style="list-style-type: none"> The total population is about 1800, and the total number of households is about 400 and a region of immigration (coming immigrants). The number of Syrian/Iraqi/etc. immigrant/refugee households is approximately 10. The age ranges are approximately evenly distributed. There is 1 primary school, 1 secondary school and 1 high school in the neighborhood. In the last 5 years, there has been a decrease in water resources from the factories in the region. While the salaried-regular workers (insured) are in the majority in the region, this is followed by those who have their own business/trades and who are interested in farming. The products grown in the neighborhood are olives, figs and peaches, respectively. There is no environmental, social or economic problem raised in the neighborhood in the current situation. There are mentally and/or physically disabled people and households with female heads in the neighborhood, but their number is unknown. No positive or negative effect is expected by the Mukhtar.
Local Community	Mustafa Mayil Mukhtar of Demirtaş Cumhuriyet Neighborhood	15.11.2021 Mukhtar's office	<ul style="list-style-type: none"> The total registered population of the neighborhood is approximately 42000 and it increases in the summer season. There has been an increase in the population in the last 5 years due to the urban development in the neighborhood. There are Syrians and Azerbaijanis in the region, but their numbers are unknown. The population between the ages of 35-50 is the majority in the neighborhood. There are 2 kindergartens, 3 primary schools, 2 secondary schools, 3 high schools and 1 private education institution within the boundaries of the neighborhood. 99% of the region is literate. Secondary school graduates are in the majority in the neighborhood. Working conditions in the neighborhood are, from majority to minority, respectively; salaried-regular employees (insured), retirees, self-employed/artisan and students. The average monthly income per household is stated as the minimum wage in 80% of the residents. There are 3 health centers and 1 polyclinic in the region. There is a traffic jam in the neighborhood due to DOSAB during work and exit hours, and especially the young people of the region disturb the environment due to the high-volume music and exhaust in the traffic.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> 4 households in the neighborhood, within the knowledge of the headman, are very poor. The number of households with mentally and/or physically disabled people is approximately 100. There also are female-headed households (5-6 households) and citizens over the age of 70 living alone in the neighborhood (the exact number is unknown). There are no complaints about the Project in the neighborhood. A negative impact is not expected from the Project and it is thought that it will have a positive impact on the region in social issues such as food aid.
Local Community	Emin Topaloğlu Mukhtar of Demirtaş Dumlupınar Neighborhood	16.11.2021 Mukhtar's office	<ul style="list-style-type: none"> The total population of the neighborhood is about 10000. There has been an increase in the population in the last 5 years due to the urban development in the neighborhood. In the region, which was brought to the status of neighborhood in 2009, 10-15 households are Syrians. The population between the ages of 45-60 is the majority in the neighborhood. There is one primary and one secondary school in the neighborhood. The literacy rate is over 80%. The main livelihoods in the neighborhood are salaried-regular works (insured), retirees and self-employed/tradesmen, respectively. The average income per household is approximately 6000-7000 TL. There is one district polyclinic in the neighborhood. The chimney smoke comes from the factories in the DOSAB (i.e. there exists an air pollution problem). With the effect of the urban development, there is a parking problem in the region. There are 5-6 households with mentally and/or physically disabled people and 1-2 households with a female head of household in the region. Mukhtar is open for any cooperation within the scope of the Project activities. Expected possible negative effects from the Project can be the smoke and smell of the RAM machine used in the textile manufacturing. Positive effects arising from the Project may be employment opportunities in the region. A traffic jam problem has been started lately. The region needs schools as the population increases.
Local Community	Mümin Dündar	16.11.2021	<ul style="list-style-type: none"> The population of the neighborhood is officially 13191. The population of the neighborhood has increased in the last 5 years due to the urban development and the lands opened for development.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
	Mukhtar of Demirtaş Sakarya Neighborhood	Mukhtar's office	<ul style="list-style-type: none"> There are approximately 1500 Syrians in the neighborhood. The population between the ages of 35-64 is the majority, followed by the population between the ages of 22-34. There is a primary school with 12 classrooms in the neighborhood. The literacy rate is 95-96%. Secondary school graduates are in the majority in the neighborhood. The livelihoods in the neighborhood are salaried-regular workers (insured), self-employed/tradesmen and retirees, respectively. There are also a few households engaged in farming and animal husbandry. There is forest land (approximately 20-30 hectares) and treasury land (approximately 100 acres) in the region, and the rest is privately owned land. The products grown in the region are olives, figs and peaches. Approximately 3-4 households are engaged in small cattle breeding and there are 400 sheep and goats in total. Wild mushrooms / pine mushrooms are also collected in the region and they are sold in the markets. Any complaint regarding with the Project has not been taken by the Mukhtar up to date. However, there are complaints regarding with some factories/facilities located in the industrial zone because of the smoke dispersed from their chimneys. There is a traffic jam due to the high population and the proximity of the organized industrial zone to the neighborhood. There are 20 very poor households, 50 mentally and/or physically disabled people and 10-15 female household heads in the neighborhood. A positive feedback about the Project from the locals has been received by the Mukhtar. No positive or negative impact is expected from the Project. Information about the needs of the region are not communicated to the investors by the DOSAB management. The neighborhood/region needs a school and a health center. Providing food aid to the neighborhood residents during Ramadan was advised.
Local Institution	Burak Aygün	15.11.2021 Private Office	<ul style="list-style-type: none"> BEZTAŞ has carried out the necessary processes regarding the permits and procedures obliged to be performed with DOSAB (such as Wastewater Connection Permit, Business Opening and Working Licenses, etc.). BEZTAŞ has just obtained the Wastewater Connection Permit, valid for 3 years.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
	GD of Demirtaş Organized Industrial Zone, Environmental Management Unit		<ul style="list-style-type: none"> BEZTAŞ has applied to DOSAB for an afforestation organization, but no official response received yet.
Local Institution	Bülent Hamdi Cingil Osmangazi Municipality Deputy Mayor	16.11.2021 Private Office	<ul style="list-style-type: none"> DOSAB is an organized industrial zone with high environmental and social sensitivity. It also contributes to the region. Therefore, companies in the region carry out their activities accordingly. There is not any negative feedback received by the Municipality regarding with the Project. DOSAB management currently is carrying out some social responsibility projects. These projects can be supported by industrial zone members. As per the results of the interviews done, including the Governorship and/or AFAD (Disaster and Emergency Management Presidency) in the stakeholder engagement process was advised to MGS.
Local Institution	Selçuk Yalçın Bursa Provincial Directorate of Environment and Urbanization Deputy Director	16.11.2021 Private Office	<ul style="list-style-type: none"> Deputy Provincial Director did not give consent to share any information/opinion, relevant with the Project. Social responsibility projects to be carried out on park areas and/or green areas for children is given as an advise to MGS.
Local Institution	Ergin Alkan, Bursa Provincial Directorate of Agriculture and Forestry Branch Manager of Agricultural Infrastructure and Land Evaluation	22.11.2021 Via online phone call	<ul style="list-style-type: none"> Any information about the Project and Project company has not been gained up to date. Any positive or negative opinion about the Project does not exist. Developing some social responsibility projects related to the establishment and development of agricultural lands considering the presence of agricultural lands in the region is given as an advise to MGS during interviews. Including the Chamber of Agriculture, Chamber of Agricultural Engineers, Marmara Birlik and Fruit and Vegetable Exporters Association in the stakeholder engagement process is taken as an advise by MGS

4.2 Stakeholder Identification

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

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context. The identified stakeholders are presented in Table 4-2.

Table 4-2. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
External Stakeholders		
Local Communities (Settlements in the Aol)		
Mukhtars and residents of the following neighborhoods <ul style="list-style-type: none"> Alaşarköy Neighborhood Demirtaş Dumlupınar Neighborhood Demirtaş Cumhuriyet Neighborhood Demirtaş Sakarya Neighborhood 	✓	
Government		
<ul style="list-style-type: none"> Bursa Provincial Directorate of Environment and Urbanization Osmangazi District Sub-Governor Bursa Provincial Directorate of Agriculture and Forest General Directorate of Demirtaş Organized Industrial Zone 		✓
Municipality		
Osmangazi Municipality	✓	✓
NGOs		
<ul style="list-style-type: none"> Bursa Chamber of Commerce and Industry 		✓
Internal Stakeholders		
<ul style="list-style-type: none"> BEZTAŞ Employees Contractors/Subcontractors 	✓	✓

4.3 Stakeholder Engagement Program

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan,
- Meetings with regulatory bodies,
- Public meetings,
- Published on local municipalities' website (if available) and/or on a dedicated Sponsor's website,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

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

Table 4-3. Stakeholder Engagement Program

ID	Target Group	Engagement Topics	Project Phase	Method of Engagement	Frequency	Responsible
SEP 1	-All affected settlements and Interested parties -Local communities -Local government -Local business	Information Disclosure <ul style="list-style-type: none"> Purpose, stages, general information about the Project and its environmental and social impacts Implementation of mitigation measures related to relevant social and environmental impacts Grievance mechanism Monitoring objectives and activities to be performed Disclosure information (SEP and GMP) via Project website for the review 	Operation phase	Public Participation Meeting	After the Environmental and Social Management Plans are approved	SRS
SEP 2	-Local businesses -All affected settlements and mukhtars	Employment and Procurement Strategies <ul style="list-style-type: none"> Recruitment of employees Training of staff Procurement of supplies and services 	Operation phase	Public Participation Meeting or depending on the requests of the stakeholder group	After the Environmental and Social Management Plans are approved	SRS
SEP 3	NGOs	Social progress, economic and social development and environmental protection Information and consultation on: <ul style="list-style-type: none"> Mitigation measures against potential environmental and social risks Sustainability Social responsibility projects, implementation principles 	Operation phase	Focus group meetings (with NGOs' representatives and members) Project website	As needed	SRS
SEP 4	-All affected settlements and mukhtars	Traffic and Transportation Management	Operation phase	Face to face meetings or focus group meetings	As needed	SRS

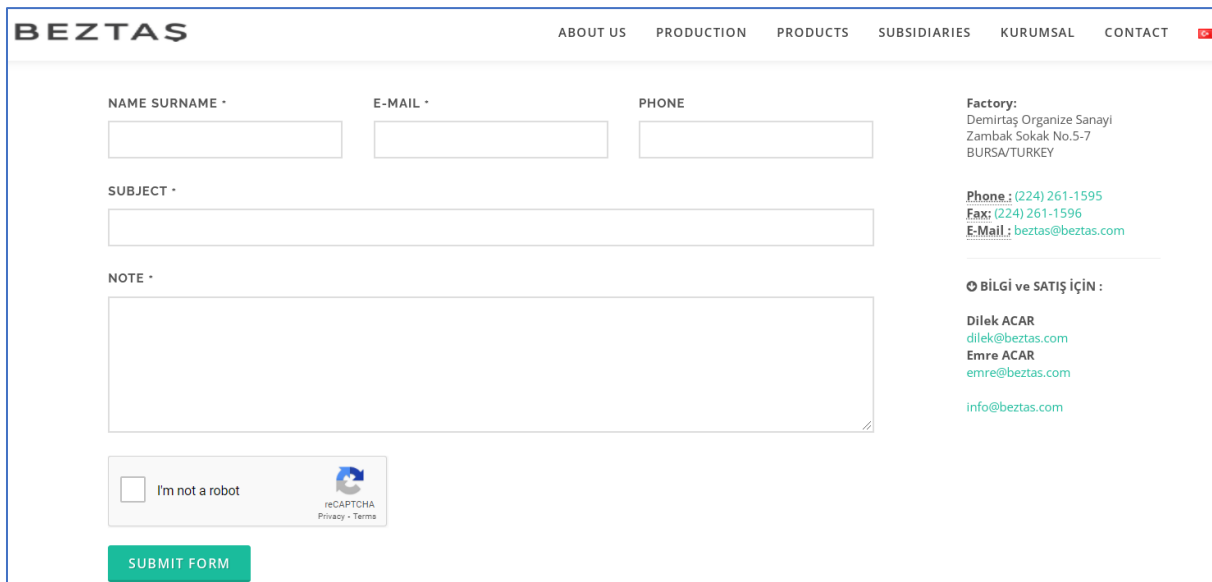
ID	Target Group	Engagement Topics	Project Phase	Method of Engagement	Frequency	Responsible
		<ul style="list-style-type: none"> Road safety awareness, including on safe crossing of the bypass and access roads Types, number and frequency of vehicles that will be used in operation phase Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns) Communication of traffic measures and Project road usage with mukhtars 		depending on the requests of the stakeholder group		
SEP 5	-All settlements affected and mukhtars	Management of environmental and social risks of the Project Information on: <ul style="list-style-type: none"> Environmental and social monitoring program Environmental and social monitoring results Overall information about progress of the Project 	Operation phase	Meetings with Mukhtars Brochures Announcements on Project Website	As needed	SRS
SEP 6	Vulnerable Groups	Employment and any other interest of vulnerable groups Information on: <ul style="list-style-type: none"> Recruitment of disabled employees General information of the project, environmental and social impacts, mitigation measures, monitoring activities of the project Special measures for the vulnerable groups 	Operation phase	Focus group meetings (with disable people and their representatives accompanied by relevant specialist depending on the disable group)	As needed	SRS

4.4 Tools & Methods for Information Disclosure

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

4.4.1 Internal / Website

Project specific web site (www.beztas.com) will keep information on the operations updated on an assigned website in both Turkish and English. Informative brochures, Grievance Mechanism Procedure will be available on the assigned website for each of the facilities. Through this website, it is possible to send grievances to the company as shown in the below figure. Also, e-mail addresses of the responsible staff, companies physical address and telephone numbers are given in the Website Communication Page.



BEZTAŞ ABOUT US PRODUCTION PRODUCTS SUBSIDIARIES KURUMSAL CONTACT

NAME SURNAME * E-MAIL * PHONE

SUBJECT *

NOTE *

☐ I'm not a robot

Factory:
Demirtaş Organize Sanayi
Zambak Sokak No.5-7
BURSA/TURKEY

Phone: (224) 261-1595
Fax: (224) 261-1596
E-Mail: beztas@beztas.com

BİLGİ ve SATIŞ İÇİN :

Dilek ACAR
dilek@beztas.com
Emre ACAR
emre@beztas.com
info@beztas.com

SUBMIT FORM

Figure 4-1. Communication Webpage of BEZTAŞ

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in each facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned websites and at the facilities offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 Responding to Local Communities and Publications for the Communities

Authorities of the facilities give full and timely responses to request, complaints and recommendations of local communities in addition to implementing the grievance mechanism procedure. All requests are treated respectfully. In the event that it is not possible to meet a

particular request, then a detailed explanation as to why not, will be given through the use of grievance mechanism procedures.

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

4.4.4 Disclosure Activities

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

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

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women for women only meetings. The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP and

grievance mechanism procedure) and the project timetable, and how they can submit comments regarding said documents.

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

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

5 MANAGEMENT OF GRIEVANCES

5.1 Existing Grievance Procedure

Currently, there is a "Request and Suggestion Communication Procedure" (BZT-2021-043) within the scope of the Project (see Appendix A). The last revision to the procedure was made on 03.01.2022.

The procedure covers the activities of receiving applications related to the complaint, investigating and evaluating the actions and persons subject to the complaint, based on the complaints and feedback received within the scope of the Project.

Responsible for the procedure has been determined as Top Management, Employer (Management) Representative, Human Resources Officer and Employee Representative. The implementation steps and explanations of the Procedure are as follows:

- 1) **Communication:** The employer's representative is primarily responsible for the evaluation of requests and suggestions. When the requests and suggestions are first evaluated, they are registered, and research is started. The research is carried out jointly with the employer representative, employee representative and human resources officer.
- 2) **External Suggestion Mechanism:** All contacted companies (customers and the entire supply chain), as well as neighbors and everyone who communicates with BEZTAŞ due to both operational and geographical location, can send their requests and suggestions through e-mail address on the official website of the company

(dilekveoneriler@beztas.com) and can reach the Project by using requests and suggestions forms present in consultation desk.

- 3) **Receiving Requests and Suggestions:** Employee satisfaction study is carried out under the name of "Social Compliance Questionnaire" in the Project. In addition, suggestions are sent to the Employer's Representative by putting them in the Request-Suggestion box (Figure 5-1). In addition, the employee can fill in the "Contact Form" and hand it over to the employer's representative/employee representative or Human Resources Officer personally. The Request-Suggestion box is opened once a month by the employee representative and human resources.

The suggestions received are recorded by the human resources, and a meeting is held with the employer's representative, employee representative, human resources officer and occupational safety expert, and decisions are taken considering the urgency of the issues. Topics can be moved to Occupational Health and Safety Committee meetings when necessary.

Situations that are considered to be of high urgency are: problems that stop production or working efficiency, quality problems that cause loss of production and efficiency, problems that risk human health, problems that are constantly communicated on the same subject, etc.



Figure 5-1. Request and Suggestion Box located in Cafeteria

- 4) *Evaluation of Requests and Suggestions:*** The requests and suggestions placed in the request and suggestion box are opened once a month and checked by the employee representative and human resources. In addition, in cases requiring urgent solutions, those who make suggestions can attend the Request-Suggestion Communication meetings, or they can communicate with human resources or employee representatives one-on-one and submit their request in writing. In the external suggestion mechanism, request and suggestions are received through the request and suggestion boxes in the consultation desk or via the request and suggestion forms on the website or via e-mail. Evaluation of the suggestions is handled at the monthly “Request-Suggestion Communication Meetings”. Interviews with the person making the proposal are made within the framework of a certain courtesy, personal information is not disclosed without the consent of these people.
- 5) *Investigation of Requests and Suggestions:*** The employer representative, employee representative or human resources officer conducts the necessary interviews and examinations by conducting on-site investigations regarding the complaint. The Employer Representative ensures that the precautionary decisions to be taken in the light of this information are taken into consideration at the Request-Suggestion Communication Meetings.
- 6) *Establishing and Monitoring Reconciliation with the Employee:*** If the solution proposed by the employer's representative is approved by the employee, an agreement is reached, and the agreed solution is implemented by the responsible persons as soon as possible. If the employee does not find the proposed solution appropriate and no agreement can be reached, the Employer's representative presents an alternative solution, if any.
- 7) *Reporting:*** The employer representative informs and evaluates the suggestions at the Request-Suggestion Communication Meetings once a month, creates meeting decision minutes and shares them with the top management when necessary and publishes them on bulletin boards.
- 8) *Measuring the Level of Satisfaction with the Process of Handling Requests and Suggestions:*** A survey is conducted to determine the satisfaction levels of the employees in the Project. The survey results are evaluated by the Employer's representative and Corrective/Preventive Actions can be initiated for the detected nonconformities. Surveys conducted, survey evaluations and actions taken are regularly discussed/evaluated at Management Review meetings.
- 9) *Evaluation of Social Compliance Surveys:*** Social compliance surveys are conducted at least once a year in the organization of the Employer Representative and

social compliance specialist. Joint action is taken with the Human Resources Officer and the Employee Representative.

10) Retention of Records: All records related to employee requests and suggestions are kept for 2 years.

In addition, policies and procedures are announced, and access is provided to newly recruited personnel and employees during the Social Compliance Trainings held throughout the year and on our bulletin boards. The Request and Suggestion Communication Procedure is reviewed annually by the top management.

In addition, according to the information received from the Project representatives, the complaints voiced by the employees are generally related to the taste of the food in the cafeteria.

When the existing Request and Suggestion Communication Procedure is examined, it is seen that there is not enough information about the evaluation, feedback, recording and closing of external complaints. In addition, the external stakeholders are focused on customers, suppliers and Project area neighbors in terms of location.

5.2 Requirements of a Grievance and Feedback Procedure

As discussed previously; 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 with the help of HSE Department Chief who are the primary interfaces between the community and BEZTAŞ. 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 either Corporate Communications or Human Resources departments. 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 or HSE Department Chief, 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 the Project.

5.2.1 Principles of the Grievance Mechanism (Internal and External 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 Department Chief. 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.

5.2.2 Collection, Registration and Evaluation of Grievances

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

- Initiate the grievance procedure by filling up a Complaint Form (see Appendix B), mainly by the SRS,
- SRS registers the grievance/comment in the grievance database (see Appendix F);
- The SRS investigates the grievance and makes the first evaluation with the help relevant Department Chief;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 working days that the grievance solution process has started;

- The complainant is informed about the resolution (at most in 30 working days after the grievance is received).
- The grievance is officially closed after related documentation (Grievance Closure Form given in Appendix C) is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated by Corporate Communications, Human Resources and HSE Department; however, handling and tracking should be ensured to be done mutually.

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

5.2.3 Feedback to the Stakeholders

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

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is essential in maintaining a ‘social license to operate’, which refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

The SEP will be reviewed and revised (if needed) annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated, if necessary.

5.2.4 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the 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 the Project). These two mechanisms will have different respondents: External Grievance Mechanism will be directly run by the SRS and the HSE Department Chief, while the first respondents of the internal grievances will be Operational Chiefs. The internal grievance procedure will be then run by the SRS and HSE Department Chief. A sample of the internal grievance form is presented in Appendix E.

5.3 Contact Details

BEZTAŞ Textile Industry and Trade Co. Ltd.

Demirtaş Organize Sanayi, Zambak Sokak, No.5-7 Bursa/TURKEY

Telephone: +90 (224) 261 15 95

Fax: +90 (224) 261 15 96

E-Mail: beztas@beztas.com

Online Grievance Form: <https://www.beztas.com/iletisim>

dilekveoneriler@beztas.com

For grievances, request and suggestions;
 Nilay Handan ÖZMEN
 Social Responsibility Staff / Social Compliance Specialist
 E-mail address: nilay@beztas.com

6 MONITORING

6.1 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions. These can be used to assess the progress and effectiveness of the stakeholder engagement performance.

Table 6-1. Key Performance Indicators (KPIs)

KPI*	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 working days	100% of the complaints are closed within 30 working days	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report

* each KPI will be kept separately for each facility.

6.2 Key Monitoring Activities

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

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

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

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

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

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

The key monitoring activities will focus on ensuring compliance with the requirements set out in this Plan using the key performance indicators.

Table 6-2. Key Monitoring Measures

	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring 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 Database	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Site office
Disclosure Materials and	SRS will keep records of the types of leaflets, brochures, newsletters prepared and	Community Info System on the Website	Quarterly	Site office

	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Feedback to Communities	distributed. SRS will monitor feedback to local communities			
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Bi-annually (construction) Annually (operation)	Site office

7 TRAININGS

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 procedure. 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 the stakeholder engagement activities and grievance mechanism procedure.

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers. The trainings will be given in the first “Induction Training” session. All employees of 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.

7.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Stakeholder Engagement Plan and Grievance Management is also provided to the Social Responsibility Staff and other personnel and supervisors of the Project and contractors involved.

8 AUDITING AND REPORTING

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

8.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Responsibility Staff during the operational phase regarding the proper implementation of SEP. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits.

Moreover, the conformance with this Stakeholder Engagement Plan will be subject to periodic assessment as part of the Project audit program and separately by Project Lenders.

8.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

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

On 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 will evaluate and conclude this overview with project management in the monthly progress meetings.

APPENDICES

Appendix A: Existing Request and Suggestion Communication Procedure

Appendix B: Complaint Register Form

Appendix C: Grievance Closure Form

Appendix D: Consultation Form

Appendix E: Internal Grievance Form

Appendix F: Grievance Database

Appendix A: Existing Request and Suggestion Communication Procedure

DİLEK ve ÖNERİ İLETİŞİM PROSEDÜRÜ	TARİH	Sayfa No	Doküman No
	14.09.2020	1/4	BZT-2021-043

REVİZYON NO	TARİH	REVİZYON AÇIKLAMASI
02	03.01.2022	Yeni Yayın

1.AMAÇ

Bu prosedürün amacı, çalışanların ve iletişimde bulunduğumuz tüm firmaların (müşteriler ve tüm tedarik zinciri) ayrıca Beztaş Tekstil ile gerek işleyiş gerekse coğrafi konum nedeniyle iletişimde bulunan herkesin şikayetlerinin, dilek ve önerilerinin değerlendirilmesini, sonuçlandırılmasını ve uygulanacak süreci belirlemektir.

2.KAPSAM

Bu prosedür, kuruluşumuzda, alınan şikayet ve geri bildirimlerden hareket edilerek şikayet ile ilgili başvuruların alınması, şikayete konu olan eylem ve kişilerin araştırılması ve değerlendirilmesi faaliyetlerini kapsar.

3.SORUMLULUKLAR

3.1 Üst Yönetim

Etkin ve verimli olarak şikâyetleri ele alma süreci için ihtiyaç duyulan kaynakları belirlemek ve temin etmek. Şikâyetleri ele alma sürecinin etkinliğini düzenli olarak gözden geçirmek.

3.2 İşveren (Yönetim) Temsilcisi

Şikâyetleri ele alma sürecinin performansı hakkında düzenli aralıklarla (ayda bir) yönetimin gözden geçirmesi toplantıları aracılığı ile üst yönetime rapor vermek.

Çift taraflı şikâyet dinleme toplantılarını organize etmek ve raporlamak.

3.3 İnsan Kaynakları Sorumlusu

Şikâyetlerin araştırılmasında işveren temsilcisi, çalışan temsilcisi ile ortaklaşa çalışmak
İşveren temsilcisinin firmada bulunmadığı zamanlarda, işveren temsilcisi görevlerine vekaleten bakmak.

3.4.Çalışan Temsilcisi

Şikâyetlerin dinlenmesi, araştırılması ve sonuçlandırılması süreçlerinin tamamında işveren temsilcisi ve insan kaynakları sorumlusu ile ortaklaşa çalışmak.

Hazırlayan	Kontrol	Kontrol	Onaylayan
Kurumsal Sosyal Uygunluk Uzmanı Nilay Handan ÖZMEN	İşveren Temsilcisi Cengiz ALPASLAN	İnsan Kaynakları Müdürü Tuğba KARAGÖZ	Yönetim Kurulu Üyesi Emre ACAR

DİLEK ve ÖNERİ İLETİŞİM PROSEDÜRÜ	TARİH	Sayfa No	Doküman No
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4.UYGULAMA

BEZTAŞ TEKSTİL, aşağıda yer alan esaslar dahilinde şikayetleri ele alır, izler, elde edilen verileri değerlendirerek çalışan memnuniyeti yönetim sisteminin sürekli iyileşmesini sağlar.

4.1 İletişim

Dilek ve Önerilerin değerlendirilmesinden birinci derecede işveren temsilcisi sorumludur. Dilek ve Öneri ilk değerlendirilmeye alındığında kaydı yapılır ve araştırılmaya başlanır. Araştırma işveren temsilcisi, çalışan temsilcisi ve insan kaynakları sorumlusu ile ortaklaşa yürütülür.

4.2 Dış Öneri Mekanizması

İletişimde bulunduğumuz tüm firmalar (müşteriler ve tüm tedarik zinciri) ayrıca komşularımız ve Beztaş Tekstil ile gerek işleyiş gerekse coğrafi konum nedeniyle iletişimde bulunan herkes, Firmamızın resmi internet sitesindeki dilek ve öneri e-mail adresini kullanarak ve danışmada bulunan dilek öneri formları aracılığıyla bize ulaştırabilirler.

4.3 Dilek ve Öneri Alınması

Beztaş Tekstil’de “Sosyal Uygunluk Anketi” adı altında çalışan memnuniyet çalışması yapılmaktadır. Ayrıca öneriler Dilek -Öneri kutusuna atılarak İşveren temsilcisine ulaştırılır .Bunun yanında çalışan isterse “İletişim Formunu” doldurarak işveren temsilcisine / çalışan temsilcisine veya İnsan Kaynakları Sorumlusuna bizzat elden de teslim edebilir.

- ✓ Dilek -Öneri kutusuna ayda bir bakılır.
- ✓ Dilek ve Öneri kutusu çalışan temsilcisi, insan kaynakları tarafından açılır.
- ✓ Gelen öneriler insan kaynakları tarafından kayıt altına alınarak konular hakkında işveren vekili, çalışan temsilcisi, insan kaynakları sorumlusu ve iş güvenliği uzmanı ile birlikte toplantı yapılarak konuların aciliyet önemide göz önünde tutularak karar alınır. Konular gerekli durumlarda İş Sağlığı ve Güvenliği Kurul toplantılarına taşınabilir.
- ✓ Aşağıda yer alan durumlarda yapılan önerilerin aciliyet önemi **yüksek** olarak kabul edilir
 - Üretim veya çalışma verimliliğini durduran problemler,
 - Üretim ve verim kaybı yaratan kalite problemleri,
 - İnsan sağlığını riske eden problemler,
 - Sürekli aynı konuya dair iletilen problemler,

Hazırlayan	Kontrol	Kontrol	Onaylayan
Kurumsal Sosyal Uygunluk Uzmanı Nilay Handan ÖZMEN	İşveren Temsilcisi Cengiz ALPASLAN	İnsan Kaynakları Müdürü Tuğba KARAGÖZ	Yönetim Kurulu Üyesi Emre ACAR

DİLEK ve ÖNERİ İLETİŞİM PROSEDÜRÜ	TARİH	Sayfa No	Doküman No
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4.4 Dilek ve Öneri Değerlendirilmesi

Dilek ve öneri kutusuna atılan dilek ve öneriler ayda bir açılarak çalışan temsilcisi ve insan kaynakları tarafından kontrol edilir. Ayrıca acil çözüm gerektiren durumlarda öneride bulunan eğer isterse Dilek-Öneri İletişim toplantılarına katılabilir ya da birebir insan kaynakları ya da çalışan temsilcileri ile görüşüp dilek talebini yazılı olarak da iletebilir. Dış öneri mekanizmasında dilek ve öneriler danışmada bulunan dilek ve öneri kutuları aracılığıyla veya internet sitesinde bulunan dilek ve öneri formları ya da e mail yolu ile alınır. Önerilerin değerlendirmesi aylık yapılan “Dilek-Öneri İletişim Toplantılarında” ele alınır. Öneri yapan kişi ile yapılan görüşmeler belli bir nezaket çerçevesinde yapılır, kişisel bilgiler bu kişilerin rızası olmadan açıklanmaz.

4.5 Dilek ve Önerilerin Araştırılması

Şikâyet ile ilgili araştırmaları yerinde incelemelerde bulunarak işveren temsilcisi, Çalışan temsilcisi veya insan kaynakları sorumlusu gerekli görüşme ve incelemeleri yapar. İşveren Temsilcisi bu bilgiler ışığında alınması gereken önlem kararlarını Dilek-Öneri İletişim Toplantılarında ele alarak karara bağlanmasını sağlar.

4.6 Çalışan ile Mutabakatın Sağlanması ve İzleme

İşveren temsilcisi önerdiği çözümün çalışan tarafından uygun bulunması halinde mutabakat sağlanır ve mutabık kalınan çözüm en kısa sürede sorumlu kişiler tarafından uygulamaya alınır. Çalışanın sunulan çözüm önerisini uygun bulmaması ve mutabakat sağlanamaması halinde İşveren temsilcisi varsa alternatif çözüm önerisini sunar.

4.7 Raporlamalar

İşveren temsilcisi önerilerle ilgili ayda bir Dilek-Öneri İletişim Toplantılarında öneriler hakkında bilgilendirmeler ve değerlendirmeler yaparak toplantı karar tutanakları oluşturur ve gerekli durumlarda üst yönetim ile paylaşır ve duyuru panolarında yayınlar.

4.8 Dilek ve Önerileri Ele Alma Süreci ile İlgili Memnuniyet Seviyesinin Ölçülmesi

Beztaş Tekstil’de çalışanların memnuniyet seviyelerini belirlemek için anket düzenlenir. Anket sonuçları İşveren temsilcisi tarafından değerlendirilir ve tespit edilen uygunsuzlukları Düzeltici/Önleyici Faaliyetler başlatılabilir. Yapılan anketler, anket değerlendirmeleri ve alınan aksiyonlar düzenli olarak Yönetimi Gözden Geçirme toplantılarında görüşülür/değerlendirilir.

4.9 Sosyal Uygunluk Anketlerinin Değerlendirilmesi

Sosyal uygunluk anketleri yılda en az bir defa olarak İşveren Temsilcisi ve sosyal uygunluk uzmanı organizasyonunda gerçekleştirilir. İnsan Kaynakları Sorumlusu ve Çalışan Temsilcisi ile ortak hareket edilir.

Hazırlayan	Kontrol	Kontrol	Onaylayan
Kurumsal Sosyal Uygunluk Uzmanı Nilay Handan ÖZMEN	İşveren Temsilcisi Cengiz ALPASLAN	İnsan Kaynakları Müdürü Tuğba KARAGÖZ	Yönetim Kurulu Üyesi Emre ACAR

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4.10 Kayıtların Saklanması

Beztaş Tekstilde’de çalışan dilek ve önerileri ile ilgili tüm kayıtlar 2 yıl süreyle saklanır.

5.İLETİŞİM

Yeni iş başı yapan personel ve çalışanlara yıl içinde yapılan Sosyal Uygunluk Eğitimlerinde ve duyuru panolarımızda politika ve prosedürlerimiz duyurulmakta ve erişim imkanı sağlanmaktadır.

6.KONTROL

Dilek ve Öneri İletişim Prosedürü her yıl üst yönetim tarafından gözden geçirilmektedir.

7.FORMLAR

Dilek-Öneri Formları (**Doküman No:BZT-2021-043-1**)

Dilek-Öneri Toplantı Kayıtları (**Doküman No:BZT-2021-043-2**)

Sosyal Uygunluk Anketleri(**Doküman No:BZT-2021-043-3**)

Hazırlayan	Kontrol	Kontrol	Onaylayan
Kurumsal Sosyal Uygunluk Uzmanı Nilay Handan ÖZMEN	İşveren Temsilcisi Cengiz ALPASLAN	İnsan Kaynakları Müdürü Tuğba KARAGÖZ	Yönetim Kurulu Üyesi Emre ACAR

Appendix B: Complaint Register Form

Complaint Register 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 C: 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
...../...../.....		

Appendix D: Consultation Form

Consultation Form				
Reference No:				
Person Filling the Form:			Date:	
Interview Agenda:			Reference No:	
Information on Consultation				
Interviewee Institution:			Communication Type	
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>
Phone:			Face to face interview	<input type="checkbox"/>
Address:			Web-site/ E-Mail	<input type="checkbox"/>
E-Mail:			Other (Explain)	<input type="checkbox"/>
Stakeholder Type				
Public Institution <input type="checkbox"/>	Project Affected People <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Workers' Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
Detailed Information on Consultation				
Questions related to Project				
Concerns/feedbacks related to Project				
Responses to the views expressed above:				

Appendix E: 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):		



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