



FINAL REPORT

Niğde G4-Bor-1 Solar Power Plant Project

Stakeholder Engagement Plan

Submitted to:

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DEFINITIONS¹

Environmental and Social Impact Assessment: The Environmental and Social Impact Assessment (ESIA) process is a way to identify, predict and assess the type and scale of potential E&S impacts, and opportunities to benefit conservation associated with any business activities or projects.

Grievance Mechanism: The IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009) defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Public consultation: As referred in the IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009), public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups and organisations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

Stakeholder Engagement Plan: Stakeholder Engagement Plan (SEP) is a guidance for stakeholder consultations and communications during the period of the main ESIA studies and other aspects of the project analysis and design. SEP is a living document should be updated toward the end of the ESIA studies to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

Vulnerable People: Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

^{1 1} The definitions presented in here are directly quoted from the Performance Standards and the Guidance Notes of IFC.

ABBREVIATIONS

The Project	Niğde G4-Bor-1 Solar Power Plant Project
'Smart' or Project Owner	Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San. ve Tic. A.Ş.
Client	Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San. ve Tic. A.Ş.
WSP Türkiye	WSP Danışmanlık ve Mühendislik Ltd. Şti.
Aol	Area of Influence
CLS	Community Level Surveys
CIMER	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
EPC	Engineering, Procurement, Construction
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
HHS	Household Surveys
IFC	International Finance Corporation
KPIs	Key Performance Indicators
MENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGOs	Non-governmental Organisations
PAP	Project Affected People
PSs	Performance Standards
SEP	Stakeholder Engagement Plan
TMMOB	Union Chambers of Turkish Engineers and Architects
TOBB	Union of Chambers and Commodity Exchanges of Türkiye
YEKA	Renewable Energy Resource Area

1.0 INTRODUCTION

1.1 Project Owner Background, Smart

Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San ve Tic A.Ş. is founded in 2014 in Istanbul and has been operating with a mission to foster sustainable future to accelerate decarbonization through innovation and science. Smart engages in the manufacture of solar photovoltaic modules and provides solar energy solutions focusing on the Research and Development. At present, Smart serves hundreds of customers in 20 countries and regions around the world. The services include:

- Financing & Leasing Solutions
- Solar Module Production
- EPC Turnkey Installation Services
- Engineering Services
- Project Development, Operation and Maintenance Services
- EV Charging Installation and Maintenance Services

Smart has 3 production bases in Türkiye: Gebze, Dilovası and Aliağa. It expects that the annual production capacity for solar module is 2.9 GW and solar cell capacity is 2 GW, respectively, by Q1 2024. As to date, Smart has more than 1,000 employees and has been certificated as a responsible company in the sphere of human rights at work.

1.2 Project Description

Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San ve Tic A.Ş. (hereinafter referred as “Smart”) has retained WSP Danışmanlık ve Mühendislik Ltd. Şti. (hereinafter referred as “WSP Türkiye” or “WSP”) to prepare the Environmental and Social Impact Assessment (“ESIA”) for the Niğde G4-Bor-1 Solar Power Plant Project (hereinafter referred as “the Project”) in compliance with the national and international requirements and this Stakeholder Engagement Plan (SEP) within the scope of the ESIA package.

The Project will have a total installed capacity of 140 MWp / 100 Mwe and located in Seslikaya and Badak Villages Bor District, Niğde Province. A national Environmental Impact Assessment (EIA) report has been prepared for the Project in accordance with the requirements of Turkish EIA Regulation, and the “EIA Positive” decision has been obtained on October 27th, 2022, with decision number of 6882.

As part of the ESIA process, in December 2023, WSP Türkiye prepared the Scoping Report, which includes the gap analysis of the national EIA Report and available documentation obtained from Smart, with respect to International Finance Institutions’ (“IFIs”) standards (Equator Principles (“EPs”) IV, International Finance Corporation (“IFC”) Performance Standards (“PSs”) and Environmental, Health, and Safety (“EHS”) Guidelines, and the best practices in the industry. The study recommends specific actions to address these gaps and achieve a comprehensive and financially viable ESIA in accordance with the Equator Principles IV and IFC Performance Standards, and the national legislation.

The SPP will consist of solar panels, an assembly structure, an inverter, a substation, an administrative building and Supervisory Control and Data Acquisition (“SCADA”) system as main components. The energy transmission line (“ETL”) will be established as an associated facility. With the establishment of the Project, it is planned to produce 100 MWe of electrical energy annually during the operation phase, and the produced energy will be transmitted to the Yaysun SPP Substation by approximately 29.5 km long 154 kV ETL that will be constructed by Turkish Electricity Transmission Corporation (“TEİAŞ”).

1.3 Project Location

Ministry of Energy and Natural Resources has allocated 2,539 hectares of land in the Bor District of Niğde Province on September 29th, 2018, where the Project is located. The legal status of the allocated land was changed to an industrial zone suitable for the development of solar power projects (i.e. Renewable Energy Resource Area (abbreviated as “YEKA” in Turkish). In accordance with that, "Competition Announcement on the Allocation of Renewable Energy Resource Areas and Connection Capacities Based on Solar Energy" was launched on July 14th, 2021, and YEKA SPP-4 (Bor-1, Bor-2 and Bor-3) competitions were held by the Ministry of Energy and Natural Resources on April 8th, 2022, accordingly. As a result of the competition, Smart has awarded with the YEKA Right of Use Agreement for the G4-Bor-1 region on May 16th, 2022.

The Project is set to be developed on a 201.3 ha of pastureland. Designated as an "Industrial Zone" in the 1/100,000 Scale Environmental Plan, the Project site falls within the borders of the “Niğde-Bor Energy Specialized Industrial Zone.”

The Project will be located in Niğde Province, Bor District. The closest settlements to the Project area, Seslikaya Village (2.64 km away), Emen Village (1.92 km away), and Badak Village (5.08 km away). The closest settlement for the ETL is Zengen neighbourhood in Ereğli, Konya Province.

Project layout is presented in Figure 1.

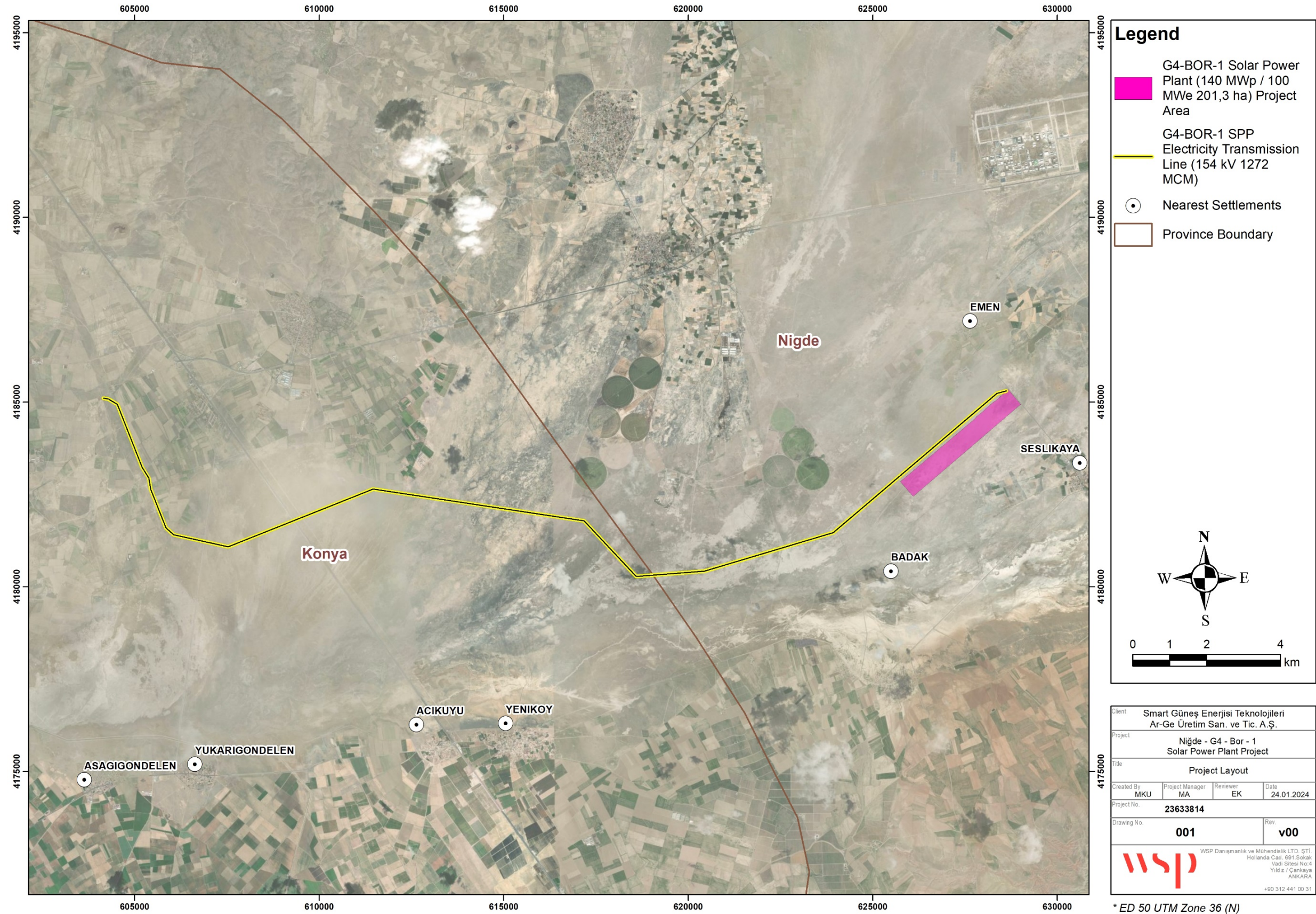


Figure 1: Project Layout with ETL

1.4 Project Parties

Organisation chart explaining the project parties that will be involved in the SPP investment are presented in Figure 2.

Project Owner: Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San ve Tic A.Ş.

TEİAŞ: Turkish Electricity Transmission Corporation, a public government company, which operates and owns the transmission of electricity, is responsible for the planning of a transmission investment for the new transmission facilities to be established, to establish new transmission facilities. The right of ownership and operation boundary of TEİAŞ starts at the connection point to the transmission system. In case the connection of the generation or consumption facility to the transmission system is carried out through the switchyard of another generation or consumption facility, the right of use, operation, and maintenance of the connected feeder belongs to TEİAŞ. However, TEİAŞ may request the operation and maintenance of such equipment to be performed by the relevant generation or consumption facility at a specified cost.

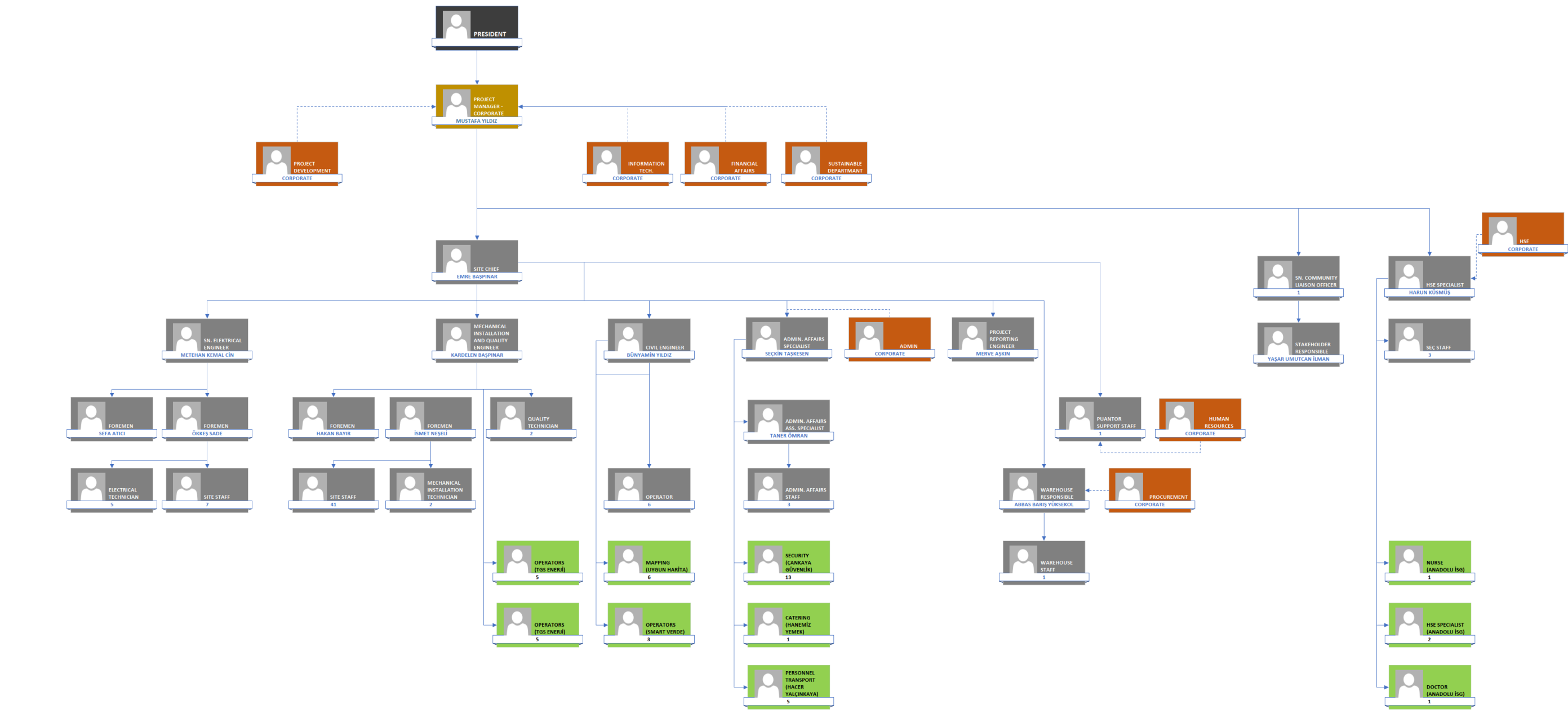


Figure 2: Organisation Chart of Smart

1.5 Project Schedule

Within the scope of the Project, construction phase is estimated around 11 months, while operation phase is estimated as 30 years.

The summary of the Project schedule is provided in Table 1 and the project schedule of ETL is summarised in Table 2. As it can be seen from the figures, construction of SPP has already been started in October 2023 and it planned to be completed in September 2024 by completion of the test and commissioning activities, while the construction of the ETL has been completed in early November 2023 and the commissioning phase is planned to be ended in January 2024.

Table 1: Project Schedule Summary

Activity	Start Date	Finish Date
Singing YEKA Contract	16.05.2022	16.05.2022
EMRA (EPDK) Pre-License Approval	24.05.2022	08.09.2023
EIA Approval	01.07.2022	27.10.2022
Approval of the Development Plans	27.07.2022	28.09.2022
Connection Contract	28.10.2022	16.11.2022
Construction Permit	16.05.2022	04.06.2022
Grounding Measurements	16.05.2022	20.05.2022
Geotechnical Investigation	16.05.2022	24.06.2022
Approval of the Final Project	16.05.2022	22.05.2024
Purchasing Procedure	01.09.2023	27.05.2024
SPP Installation (including mobilisation, fencing, infrastructural digging, cabling and road constructions)	01.10.2023	25.03.2025
Electrical Mounting (including underground cable system, OG transformer, inverter and concrete kiosk installations, AC/DC panel mounting and cabling)	01.01.2024	27.03.2025
Mechanical Mounting (including foot mounting, up carrier system mounting and PV modules)	05.09.2024	25.03.2025
Commissioning (including SPP testing and commissioning activities)	01.10.2024	05.04.2025

Table 2: Summary of ETL Construction Schedule

Activity	Start Date	Finish Date
Excavation	24.04.2023	07.09.2023
Lean Concrete	06.05.2023	13.10.2023
Bottom Mounting Adjustment	06.05.2023	14.10.2023
Concrete Casting	07.05.2023	14.10.2023
Filling	06.05.2023	16.10.2023
Floor Installation	01.05.2023	15.10.2023
Pole Installation	19.07.2023	26.10.2023

Activity	Start Date	Finish Date
Electrical Cable Installation	26.10.2023	11.11.2023
Test and Commissioning	10.11.2023	17.01.2024

2.0 REGULATORY REQUIREMENTS

This chapter provides an overview of the national and international regulatory framework, including policies, legislation, requirements, guidelines and standards applicable to the Project. In the presence of multiple standards coming from different regulatory sources, the Project will apply the most stringent standards to protect the environment and the communities potentially affected by the Project.

Applicable Environmental and Social Requirements of the Project are defined based on Turkish national legislation, international agreements, EP IV, IFC PSs and EHS Guidelines, and the best practices in the industry).

2.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

2.1.1 The Constitution of the Republic of Türkiye

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

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

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

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

2.1.2 Other main national laws/regulations

I. Civil Law

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

II. Law on the Right to Information

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

III. Law on the Use of Right to Petition

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

VI. Environmental Law

The Turkish legal framework for environmental protection was developed in line with national and international initiatives and standards, and some of them have been revised recently to be harmonized with the EU Directives in the scope of pre-accession efforts of Türkiye to the EU. In the following sections, related institutions, legislation, processes, and procedures that are related to the environmental and social aspects of the proposed Project are described.

The Ministry of Agriculture and Forestry ("MoAF") is the responsible organization for the issuing and implementation of policies and legislation adopted for the agricultural areas, forestry areas and protected areas.

The Turkish Environment Law No. 2872, which came into force in 1983, deals with environmental issues on a very broad scope. According to the basic principles that govern the application of the Environment Law, and as stated in the Constitution, citizens as well as the state bear responsibility for the protection of environment. Complementary to the Environment Law and its regulations, other laws also govern the protection and conservation of the environment, the prevention and control of pollution, and the implementation of measures for the prevention of pollution.

The Environment Law of 1983 has a comprehensive structure that has a holistic and integrated vision for the environment. "Polluter pays" and "user pays" principles and carrying capacity concepts form the basis of regulatory tools in the Environmental Law. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with EU legislation, thus contributing significantly to compensating the gaps within the former legislative system of Türkiye.

The EIA Regulation, which dates originally from 1998, has had several revisions and was most recently amended on July 29th, 2022. Although the EIA Regulation has been derived from the European Union EIA Directive, the integration of various Turkish conventions, sub-laws and governmental decrees makes the EIA Regulation distinctive in certain respects.

The lead government agency, responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for protection and conservation of the environment and for sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,
- Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
- Defining and applying environmental quality standards,
- Supervision of the network of environmental laboratories in Türkiye,
- Pollution control and inspection activities,
- Agroforestry support, soil management and erosion control, and
- Protection of Türkiye's natural heritage including national parks, areas of conservation interest, biodiversity and wildlife.

EIA Regulation Stakeholder Engagement Plan

Information sharing and stakeholder engagement are done within the scope of the provision published in the Official Gazette dated July 29, 2022, and numbered 31907 of ARTICLE 9-(5), "Informing the Public and Participating in the Process Meeting" of The Regulation of the EIA: *"To inform the public about the project and its effects, SEP is prepared by the institutions/organizations authorized by the Ministry to receive their opinions and suggestions. The prepared stakeholder engagement plan is presented in the EIA application file. When the Ministry deems it necessary, distribution of informative brochures, and questionnaires, conducting studies such as seminars or sharing information by preparing a website related to the project can be asked to inform the public throughout the EIA process by authorized institutions/organizations. In addition, if requested by the Ministry, this plan is updated during the EIA process."*

For the projects included in the Annex-1 list of the EIA Regulation, it is a legal obligation to organize the "Public Informing and Process Participation Meeting" to inform the local people who will be affected by the project. However, the planned Project area is located within the borders of the "Niğde Bor Energy Specialized Industrial Zone," and since the projects established in the industrial zones are exempted from the above ARTICLE 9-(5), the Project is exempted from this item.

In line with the international standards, this plan includes the stakeholders directly or indirectly affected by the Project, a public document presenting plans for engagement, and sharing communication information with the stakeholders. Smart will ensure that environmental and social policies, national and international standards are met and in line with the requirements of credit institutions. The SEP will be updated for each stage according to changing needs and conditions.

SEP includes a Project Overview, a Summary of Possible Social Impacts of the Project, National and International Stakeholder Engagement Plan Requirements, Stakeholder Identification (Local People, Local Administrations, National Administrations, Non-Governmental Organizations), Information sharing, Participation Activities, Public Informing and Participation in the Process Meeting, Complaint Mechanism, Monitoring and Reporting and Resources and Responsibilities.

2.2 International Standards

2.2.1 IFC Performance Standards

IFC's Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. Applicable IFC Performance Standards establish standards to this SEP are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labor and Working Conditions
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires clients to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, clients will make every reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS-1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance of clients through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

2.2.2 Equator Principles

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs.

Smart is committed to complying with the following EPs:

- Principle 5: Consultation and Disclosure.
- Principle 6: Grievance Mechanism.

Principle 5 specifically states that, for all Category A and Category B Projects, the EPFI will mandate the client to demonstrate effective engagement with stakeholders. This engagement should be an ongoing process conducted in a structured and culturally appropriate manner, particularly with affected communities and other relevant stakeholders. The client is required to conduct an informed consultation and participation process for projects that may have significant adverse impacts on affected communities. The consultation process should be tailored to the specific risks and impacts of the Project, its development phase, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. It is crucial that this process is conducted free from external manipulation, interference, coercion, and intimidation.

The client will consider and document the outcomes of the stakeholder engagement process, including any actions agreed upon as a result of such engagement. For projects with environmental or social risks and adverse impacts, disclosure should happen early in the assessment process, and in any case, before the commencement of project construction, and this disclosure should continue on an ongoing basis.

Principle 6 specifically mandates that, for all Category A projects and, where applicable, Category B projects, the EPFI will require the client to establish a grievance mechanism as part of the Environmental and Social Management System ("ESMS"). This mechanism is intended to receive and facilitate the resolution of concerns and grievances regarding the Project's environmental and social performance. It should be tailored to the risks and impacts of the project, with affected communities being the primary users. The grievance mechanism aims to address concerns promptly through a transparent and culturally appropriate process, accessible to all stakeholders at no cost and without fear of reprisal. Importantly, it should not hinder access to legal or administrative remedies. The client is also required to inform affected communities about the mechanism as part of the stakeholder engagement process.

2.3 Project Standards

Smart has established a comprehensive framework of policies and ethical principles to guide its operations, ensuring commitment to sustainable and ethical conduct across all aspects of its business operations.

- Environment And Climate Change Policy
- Human Rights Policy
- Occupational Health and Safety Policy
- Corporate Social Responsibility Policy
- Anti-Bribery and Anti-Corruption Policy
- Supply Chain Policy
- Sustainability Policy
- Donation and Aid Policy
- Information Policy
- Profit Distribution Policy
- Compensation Policy
- Ethical Principles
- Supplier Code of Conduct

3.0 STAKEHOLDER IDENTIFICATION

The purpose of stakeholder identification is to identify and prioritise project stakeholders for consultation. Stakeholder identification is an ongoing process, which will continue during different stages of the Project. According to IFC (2007):

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses. (p. 10)

Stakeholders typically fall into two main groups: primary stakeholders, comprising individuals and communities directly impacted by project effects, and secondary stakeholders, who possess an interest or influence—whether positive or negative—on the project. The key stakeholders include:

- International bodies and organizations [e.g., international investors, international finance institutions, international non-governmental organisations (NGOs)],
- National Governmental Authorities,
- Regional Government Agencies/Authorities,
- Local Authorities,
- National and local NGOs and organizations,
- Trade unions and associations,
- Education and training institutions (e.g., Universities, colleges, public schools),
- Industrial sector (e.g., construction and infrastructure trade bodies),
- Project Affected People (PAPs),
 - Mukhtars/local authorities of settlements affected by the project activities,
 - Local community members,
 - Landowners and Land users (formal and informal land users), and
 - Vulnerable groups such as older population, people with disabilities, households in poverty, women-headed households, ethnic minorities, immigrants, and refugees.
- Project employees, workers' representatives,
- Third party goods and service suppliers, contractors, and its sub-contractors,
- Social services (e.g., hospitals, local schools, and other local community services), and
- Media.

3.1 Project Stakeholders

The stakeholders are identified in Table 3 for the Project in accordance with the above classification.

Table 3: Stakeholder Classification

Type	Stakeholders	Affected		Interested/ influenced
		Direct	Indirect	
Internal Stakeholders				
Project Owner (or Client)	Smart Güneş Enerjisi Teknolojileri Ar-Ge Üretim San ve Tic A.Ş.	X		
Energy Specialized Industrial Zone Management	KES Adi Ortaklığı	X		
Sub-contractor	Sub-contractors- to be determined.	X		
Employees	Project employees	X		
Consultants	Project consultants	X		
External Stakeholders				
Other companies in Energy Specialized Industrial Zone	Kalyon YEKA GES 3 ve 4 Güneş Enerji Yatırımları A.Ş Ecogreen Elektrik Enerji Üretim A.Ş.	X		
International bodies and organizations	Lenders, potential lenders			X
National Governmental Authorities	Ministry of Energy and Natural Resources			X
Regional/Local Authorities	Niğde Governorship Niğde Governorship Bor District Governorates Niğde Provincial Directorates of Central Government Institutions Niğde District Directorates of Central Government Institutions AHİKA (Ahiler Development Agency) Niğde Municipality Bor District Municipality Mukhtars of the Badak, Emen and Seslikaya Villages Mukhtar of Zengen Neighbourhood (ETL)	X		

Type		Stakeholders	Affected		Interested/ influenced												
			Direct	Indirect													
National and Local NGOs and organizations		Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) Niğde Environment, Education and Culture Association WWF Türkiye Women-specific associations İŞKUR			X												
Education and training institutions		Niğde Ömer Halis Demir University Bor District: There are 6 public preschools, 33 public primary schools, 22 public lower secondary schools, 12 high schools, 1 vocational training centre, and 1 public education centre.			X												
Social services		Ömer Halis Demir Training and Research Hospital 1 Medical Centre, 1 Private Hospital, 9 State Hospitals, 2 Dialysis Centres, 2 Oral and Dental Health Centres, and 2 IVF Centres.		X													
PAPs	Local Communities	Residents of Emen, Seslikaya, Badak and Zengen villages	X														
PAPs		Residents of Seslikaya village affected by the Project due to occupation of pasturelands	X														
Media		<table><tr><th>Niğde News</th><th>Niğde News Websites</th><th>Niğde Radio</th><th>Niğde TV Channels</th></tr><tr><td>Niğde Haberci Newspaper</td><td>nigdehaberci.com</td><td>Bor FM</td><td>Niğde TV</td></tr><tr><td>Niğde Haber Newspaper</td><td>nigdehaber.com.tr</td><td>Umut FM</td><td></td></tr></table>	Niğde News	Niğde News Websites	Niğde Radio	Niğde TV Channels	Niğde Haberci Newspaper	nigdehaberci.com	Bor FM	Niğde TV	Niğde Haber Newspaper	nigdehaber.com.tr	Umut FM				X
Niğde News	Niğde News Websites	Niğde Radio	Niğde TV Channels														
Niğde Haberci Newspaper	nigdehaberci.com	Bor FM	Niğde TV														
Niğde Haber Newspaper	nigdehaber.com.tr	Umut FM															

Type		Stakeholders				Affected		Interested/ influenced
						Direct	Indirect	
		Bor Haber Newspaper	borhaber.net	Tempo FM				
		Niğde Anadolu Haber Newspaper	nigdeanadoluhaber.com					
		Niğdemiz Newspaper	nigdemiz.com					
		Bor'un Sesi Newspaper	borunSesi.com					
		Dünden Bugüne Gündem Newspaper	nigdegundem.com					
		Hamle Gazetesi Newspaper	hamlegazetesi.com					
		Niğde Günaydın Gazetesi Newspaper	nigdegunaydin.com					
		Yeşil Bor Gazetesi Newspaper	yesilbor.com					
Third party good and services providers		To be identified						X

3.2 Vulnerable Groups

Vulnerable groups are individuals who, due to factors such as gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage, or social status, may experience greater negative impacts from project activities compared to others. Additionally, they may face challenges in accessing or benefiting from project outcomes. These groups encompass individuals living in poverty, those without land ownership, older individuals, households headed by women or children, refugees, internally displaced persons, ethnic minorities, communities reliant on natural resources, or other marginalized groups not specifically protected by national or international laws.

As part of its ongoing commitment to responsible project management and stakeholder engagement, Smart recognizes the paramount importance of continuously updating the SEP to reflect any evolving circumstances or emerging challenges, particularly those about vulnerable groups who may be disproportionately impacted by the Project. Smart will responsibly identify and address the needs of vulnerable individuals, implementing measures to protect their well-being and minimize any negative impacts from the Project activities. By proactively identifying and integrating the concerns of vulnerable groups into the SEP, Smart demonstrates its commitment to fostering inclusive and equitable development practices that prioritize the welfare of all stakeholders within the Project area.

According to the findings derived from the surveys conducted by WSP, the vulnerable groups within the local communities are identified in this SEP and presented in Table 4.

Table 4: Vulnerable Groups in the Project Affected Settlements

Vulnerable Groups	Seslikaya	Emen	Badak
Illiterate	5	1	2
Cannot speak Turkish	0	0	0
Seasonal worker	35	5	15
Ethnic groups	4 households (approximately 20 individuals in total and 5 of them became Turkish citizen)	0	0
Woman headed households	6	3	7
Living with social aid	5	5	4
At education age but not involved in education	0	0	0
Bedridden Patients	0	0	2
Living alone over 70 years old	0	0	0
People with physical disabilities	1	1	1
People with mental disabilities	1	0	0
Earthquake victims	2 households (temporary)	0	20 individuals (temporary)

Vulnerable Groups	Seslikaya	Emen	Badak
Persons engaged in unauthorized agricultural activities on public lands	2	0	20
Persons with unauthorized structures on public lands (house, workplace, barn, hut, etc.)	0	6	

Smart will actively engage with local community leaders and representatives to better understand the specific needs and concerns of vulnerable groups. From the early phases of the Project, and support will be extended to individuals identified as vulnerable to ensure their full inclusion in information disclosure, consultation, and the grievance mechanism. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner. Regular feedback sessions and ongoing dialogue will be conducted to ensure that the support provided remains responsive and effective throughout the Project lifecycle.

The identification of vulnerable groups will be an ongoing process; therefore, the Site Chief will be responsible of identifying and continuing to engage with vulnerable groups throughout the Project lifecycle.

4.0 STAKEHOLDER ENGAGEMENT TOOLS

The purpose of the identification of various tools and methods for the stakeholder engagement is to provide for all stakeholders to access the Project with the means of their choice to ensure meaningful stakeholder participation. The effectiveness of engagement tools will be monitored, and, if necessary, new engagement tools will be developed.

Table 5: Stakeholder Engagement Tools

Engagement Tools	Content of the Tools
Community meetings	Smart will organize community meetings in collaboration with the Mukhtars of the affected settlements to disseminate information regarding the environmental and social impacts of the Project. These meetings will serve as platforms to introduce Site team to community members and to provide detailed explanations about the grievance mechanism in place.
Project website	Through the Project website, stakeholders will have access to a comprehensive repository of Project-related documentation, ensuring transparency and facilitating informed decision-making. The following documents, at a minimum, will be disclosed on the Project's website: <ul style="list-style-type: none"> Project information including the purpose of the Project, Project location and general Project layout, Permissions/approved EIA reports, Project progress and timeline, Environmental and Social Policies, Non-Technical Summary, SEP, ESAP, The grievance mechanism and the grievance forms, Frequently Asked Questions, Job Application Forms

Engagement Tools	Content of the Tools
	<ul style="list-style-type: none"> Contact details of the Site Chief and other relevant key personnel.
Phone calls, e-mails text messaging	The phone numbers and email addresses of the Site Chief will be distributed to stakeholders. Site Chief serve as direct points of contact for stakeholders and engage with them through various channels, including phone calls, emails, and text messaging. They are available to address any conditions or issues that require immediate information, to extend invitations for consultations or interviews, or to request feedback or information from stakeholders.
Project Hotline	A dedicated hotline will be established to enable stakeholders to convey their grievances, including complaints, opinions, and suggestions, throughout the ESIA process of the Project. This hotline is specifically designed to facilitate more active participation from vulnerable groups and women who may face challenges in accessing the internet. The phone number will be prominently displayed on stakeholder institutions such as provincial directorates, municipalities, the offices of Mukhtars in the affected surrounding settlements, and public spaces.
Project posters/ brochures / flyers / billboards	<p>Brochures for the Project have been developed to provide comprehensive information about the Project, the ESIA process, and contact details, including email, phone, postal address, and fax, of the Site Chief of Smart for addressing grievances. These brochures have been prepared and distributed during Public Participation Meetings (PPMs) to ensure that stakeholders receive essential information about the Project and have access to channels for communication and feedback.</p> <p>Additionally, flyers, posters, and billboards containing communication channels, announcements, and Project-related information will be strategically placed in common public areas within the surrounding settlements. These areas may include Mukhtars' offices, municipalities, provincial directorates, stakeholder professional chambers, and other community hubs.</p>
Community and Worker Grievance Mechanisms	<p>A grievance mechanism, encompassing both internal processes for workers and external channels for the community, will be implemented for the Project. This mechanism allows stakeholders to raise concerns or complaints personally, as well as via post, electronic mail, etc.</p> <p>For employees working at the Project, grievance boxes will be provided to facilitate the conveyance of complaints, concerns, and opinions. These boxes are strategically located in areas easily accessible to employees, such as the cafeteria and resting areas.</p> <p>Similarly, grievance boxes, along with simple-to-use forms, will be placed at points accessible to external stakeholders in key locations such as Mukhtars' offices, village cafes, and other public spaces within the affected settlements. Special consideration has been given to disadvantaged stakeholder groups and vulnerable individuals residing in the affected settlements.</p>
Media	Relevant Project information will also be disseminated to the public via various media outlets. This activity will primarily occur during ESIA disclosure and construction phases. Additionally, if any significant changes to the Project are anticipated that could impact local communities or land uses, information will be shared through public media channels.
Face to face meetings	Open and targeted meetings will persist as a means to actively engage with stakeholders. These meetings serve as platforms for open dialogue and targeted discussions, allowing stakeholders to express their concerns, provide feedback, and contribute insights to the Project.

5.0 STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Public Participation Meetings and Social Surveys for ESIA

Within the scope of the ESIA process, WSP undertook Public Participation Meetings and conducted surveys at household and community levels with local communities residing in the nearest settlements. This engagement initiative occurred during a social site visit conducted between March 6th and March 8th, 2024.

During these meetings and surveys, pertinent information about the Project was provided to the community members. This information likely included details about the nature, scope, and potential impacts of the Project on the local environment, economy, and social dynamics. The purpose of this dissemination of Project information was to ensure that the community members were well-informed about the Project and its potential implications for their lives and livelihoods. Additionally, a Question and Answer (Q&A) session was conducted during these meetings. This session provided a room for community members to ask questions, seek clarification, and express their concerns or opinions regarding the Project. Questions received on the anticipated impacts on land use and employment opportunities that will be provided by the Project. Overall, these Public Participation Meetings and surveys served as crucial components of the ESIA process, facilitating meaningful engagement with the local communities.

The information on the public participation meetings is presented in Table 6.

Table 6: Public Participation Meetings

Province	District	Village	Date
Niğde	Bor	Seslikaya	06.03.2024
Niğde	Bor	Emen	07.03.2024
Niğde	Bor	Badak	08.03.2024

5.2 Project Engagement Activities and Corporate Social Responsibility

The Project's engagement activities and Corporate Social Responsibility ("CSR") initiatives are designed to identify and support vulnerable groups, provide tailored assistance, and address specific issues raised by community members. Regular communication with mukhtars and other stakeholders is a key part of this process, ensuring inclusivity and responsiveness to local priorities. To maintain transparency and accountability, minutes of meetings with mukhtars and records of all assistance activities are documented by Smart.

Engagement topics cover a range of social and economic issues, including employment opportunities, infrastructure improvements, and assistance to vulnerable groups. Infrastructure-related actions, such as cleaning and widening water channels, drilling wells, and implementing dust suppression measures, are related to reducing Project impacts and supporting local development.

The stakeholder engagement list, requests received by the Project and conducted CSR initiatives are presented in Table 7.

Table 7: Stakeholder Engagement and CSR Initiatives of the Project

Date	Settlement	Number of people engaged	Topic	Engagement Method	Status
16.10.2023	Seslikaya	2	Engagement for employment of a local woman whose child has disability upon the mukhtar's request	Verbal	Completed
25.01.2024	Emen	1	Cleaning and widening of the water channel	Phone call	Completed
19.02.2024	Emen	2	Drilling well opening	Written	Completed
09.03.2024	Seslikaya	-	Grave digging in the village cemetery for a funeral	Verbal	Completed
05.04.2024	-	2	Recruitment of security personnel upon the mukhtar's request	Written	No additional security needs at the site and therefore not evaluated
17.04.2024	Emen	5	Dust suppression due to damage to the village road caused by vehicle traffic	Verbal	Completed
19.07.2024	Seslikaya	2	Engagement regarding the problem that the imam's house in the village is in poor condition, resulting in the absence of an imam for the mosque	Written	Completed
Between 06.08.2024 and 08.08.2024	Emen Seslikaya Badak	7 (Emen) 25 (Seslikaya) 12 (Badak)	Determining vulnerable groups for distributing food vouchers and food box assistance	Written	Completed
04.09.2024	Emen Seslikaya Badak	3 (separate meetings)	Discussion of requests, suggestions, and complaints with the mukhtar	Written	Completed

Date	Settlement	Number of people engaged	Topic	Engagement Method	Status
Between 05.09.2024 and 19.09.2024	Emen Seslikaya Badak	3 (Emen) 6 (Seslikaya) 3 (Badak)	Distribution of fuel aid	Written	Completed
09.08.2024	Emen Seslikaya Badak	8 (Emen) 2 (Seslikaya) 3 (Badak)	Identifying vulnerable groups for stationery assistance	Written	Completed
23.09.2024	Emen Seslikaya	6 (Emen) 3 (Seslikaya)	Distribution of shopping card assistance	Written	Completed

One significant impact of the Project is increase in vehicle traffic in affected settlements, especially in Emen village. In order to minimize Project impacts for the affected stakeholders:

- The planned number of shipments during the construction phase is 1,500 trucks. Traffic and road safety assessments are continuously conducted to ensure safe and efficient operations. A Traffic Management Plan has been developed to address traffic safety concerns and mitigate risks linked to Project activities.
- To minimize congestion on local roads, traffic volumes and peak hours are carefully considered during the transportation of equipment and materials. Appropriate traffic signs, signals, lights, and markings have been placed in critical areas, particularly along Emen Village Road, to prevent accidents. These signs are regularly inspected to ensure their effectiveness.
- In addition, shipment schedules are carefully planned to avoid disturbances to local communities, with particular attention given to not scheduling shipments during early or late hours. Flagging personnel are stationed at blind spots, particularly in Emen Village, once shipments begin, to further enhance safety.

5.3 Stakeholder Engagement with PAPs

To facilitate effective engagement, focus group meetings were conducted by Smart in the settlements within the Project Aol. These meetings were organized in February and March 2025 and involved a total of 33 households across four different settlements: Seslikaya, Badak, Emen, and Zengen. The discussions focused on gathering information on livelihood impacts, addressing concerns, and identifying potential solutions to mitigate any negative impacts related to the Project. Table 8 the settlements, dates, and household numbers of the focus group meetings conducted with PAPs.

Table 8: Focus Groups Meetings Conducted with PAPs

Settlement	Date	Household number
Seslikaya	26.02.2025	9
Badak	27.02.2025	6
Emen	28.02.2025	9
Zengen	01.03.2025	9

The Project area is located on the pastureland of Seslikaya neighbourhood. In February 2025, focus group interviews were conducted by Smart with the households engaged in livestock farming from the settlements within the Project Aol including the villages of Badak, Emen, and Seslikaya, to update information on livestock

activities and livelihood impacts. Interviews were conducted with 9 households in Emen, 6 households in Badak, and 9 households in Seslikaya.

Households were asked about the number of livestock they owned. According to their responses, the 9 households in Emen have a total of 1,320 small livestock, those in Badak have 1,970, and those in Seslikaya have 2,230, with only Seslikaya utilizing the pastureland where the Project is located.

In Seslikaya, it was stated that the projects within the YEKA area has had a negative impact on livestock farming, as the area available for grazing has been reduced. Due to drought in the pastures, there had already been a shift towards cattle farming, and animals were being fed with purchased feed. Some households had even stopped livestock farming. The intersection of drought and the establishment of multiple projects on the pastureland has led to effects such as reduced grazing areas, a decrease in the number of animals, a transition to cattle farming or abandonment of livestock, and increased feed costs for those feeding their animals with purchased feed in Seslikaya.

In the interviews, when the issue of alternative grazing areas was addressed, it was reported that while alternative grazing areas are available, accessing them requires additional travel. As an alternative measure, households have been purchasing feed, and therefore, there is an expectation for support in providing feed.

The key outcomes from the focus group interviews are as follows:

- **Provision of feed support:** The interviewed households expressed a need for support in obtaining feed due to the challenges posed by drought and limited access to grazing areas. Providing feed support would help ensure that livestock are adequately nourished, especially in regions where natural grazing resources are limited or require longer travel distances.
- **Planting of saltbush:** The interviewed households expressed planting of saltbush as a support. In recent years, the widespread adoption of saltbush planting has proven to be an effective solution for meeting the feed requirements of livestock farming and supporting farming communities in regions affected by drought or water scarcity.

The Project ETL is located in Zengen neighbourhood, Ereğli, Konya. In March 2025, focus group interviews were conducted by Smart with the deputy mukhtar and households engaged in livestock farming in Zengen. According to the information obtained from the deputy mukhtar, there is no livestock activity in the area where the ETL is located. The pasture of Zengen neighbourhood consists of two sections; small livestock grazing does not take place in the section where the ETL passes, but it does in the other section, and livestock activities in that area are not affected by the Project.

Focus group interviews were conducted in Zengen neighbourhood with seven households engaged in livestock farming. The households stated that they were not affected by the Project, as they do not carry out livestock activities in the ETL area, and therefore, the Project does not impact livestock farming or their livelihoods.

5.3.1 Livelihood Engagement and Mitigation Measures

To assess livelihood impacts due to the Project, address concerns, and identify potential solutions to mitigate any negative impacts related to the Project, engagement were conducted February 2025 with small livestock breeders in the villages of Emen, Seslikaya, Badak, and Zengen. It was determined that the community most affected resided in Seslikaya, due to the Project being established on land belonging to Seslikaya. However, support such as feed assistance and pasture rehabilitation was already being provided in Seslikaya Village by other projects within the YEKA area. Following this outcome, and in response to requests regarding the revitalization of pasture areas, meetings were held with the Bor District Directorate of Agriculture and Forestry, the Niğde Provincial Directorate of Agriculture and Forestry, the Pasture and Meadow Unit, and the Konya Institute for Combating Desertification and Drought. During the meetings, it was conveyed that the saltbush

plant is suitable for the geography in which activities are being carried out, and that successful implementations have been observed in Konya. In addition to pasture rehabilitation, agricultural directorates have indicated a potential infrastructure need for water troughs and animal shelters in the pastures. Community consultations on this matter will be held. If a need is identified, additional measures and actions will be taken to support livestock breeders.

6.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The stakeholder engagement program aims to inform, disclose, and consult with all stakeholders using various engagement tools. Different engagement tools are proposed to ensure informed consultation and participation during the Project implementation in a culturally appropriate manner, respecting human rights and considering gender inclusion.

Following the approval of the Project documentation, including but not limited to, the ESIA, NTS, CDP and the other supporting management plans, will be disclosed on the Project's website, and the hard copies of the NTS and SEP will be provided to the affected Mukhtars for the distribution to the PAPs. The NTS will cover the following:

- Brief description of the Project,
- Project timeline,
- Information on environmental and social studies carried out to date,
- Impact summary and mitigation measures,
- Tools for the submission of grievances, comments and feedback.

6.1 Information Disclosure

The complete ESIA, SEP, and NTS documents will be made available electronically on the Project website in both Turkish and English. Additionally, hard copies of the SEP and NTS will be accessible at the Mukhtars' offices in nearest settlements.

To keep stakeholders informed about Project updates and increase awareness, various communication tools will be utilized, including the project website, social media platforms, local and regional media outlets, notice boards at the Mukhtars' offices, as well as distributing leaflets and banners.

All relevant NGOs, associations, and interested organizations identified in this SEP will be informed about the disclosure process, and links to the Project documents will be shared with them. When necessary, disclosure packages will be emailed or sent via postal mail.

Notifications about ESIA disclosures will be advertised in local and regional media channels.

Throughout the Project's development and construction phases, Site Chief will compile monthly reports detailing the Project's social performance, engagement activities, and outputs from the grievance mechanism.

6.2 Consultation

In accordance with IFC Performance Standards, public consultation serves as a means of facilitating open communication between the client and the public. Its primary objective is to enhance decision-making processes and foster understanding by actively engaging individuals, groups, and organizations with a vested interest in the Project. This engagement is intended to enhance the Project's long-term sustainability and benefit those directly affected by it, as well as other stakeholders.

This SEP has been developed to facilitate interaction with stakeholders of Smart, aiming to keep them informed about the Project activities, address their concerns, and involve them in decision-making processes through a participatory approach. Smart will implement the following consultation strategies:

- A diverse range of communication channels will be utilized to reach a broader audience, including online platforms, community meetings, newsletters, and other accessible mediums tailored to the preferences of different stakeholders.
- A grievance mechanism that allows stakeholders to easily submit comments, questions, or grievances at any time throughout the Project lifecycle will be established.
- All proposed communication channels will provide the contact information of Site Chief and details about the grievance mechanism procedure.
- To enhance effective communication and engagement with community members, collaboration will be established with Mukhtars and representatives of local organizations.
- Site Chief will actively encourage the participation of women, handle and document gender-related grievances, and arrange separate consultations for women if necessary.
- Targeted consultations will be conducted to engage vulnerable groups identified, ensuring their active involvement in information sharing, stakeholder engagement, and the grievance mechanism.
- Engagement with other projects within the YEKA area will be organized to address the cumulative economic displacement impacts and related mitigation measures. These measures will involve coordinating with the relevant authorities to ensure that the Project's livelihood restoration strategies align with government initiatives.
- Regular monitoring of monthly summaries and statistics related to consultation activities and grievances will be carried out.
- The approach will be flexible and adaptive based on the evolving needs and dynamics of the stakeholders, and the effectiveness of strategies will be regularly assessed and adjusted accordingly.

Ultimately, by adhering to these consultation strategies and maintaining a commitment to adaptability and responsiveness, Smart will cultivate strong relationships with stakeholders, promote transparency, and ensure that their voices are acknowledged and considered throughout the Project lifecycle.

6.3 Proposed Programme for Project Phases

Pre-construction

During the pre-construction phase, activities will prioritize the disclosure of Project information, including details such as the construction schedule and topics related to land entry.

Construction

During the development of the ESIA, ESMS, and related management plans, particular attention will be given to minimizing the impacts on labour and working conditions, community health and safety, transportation, and other relevant areas during the construction phase. Throughout the construction phase, engagement activities will be focused towards minimizing Project-related construction impacts. The ESMS will be structured to address and reduce the impacts on labour and working conditions, community health and safety, and transportation, with contractors and subcontractors implementing relevant management plans.

The SEP will be regularly updated based on feedback received during the ESIA disclosure period. Identified stakeholders will be reassessed, and the stakeholder list will be updated as necessary. Regular stakeholder

engagement activities will be conducted during the construction phase to keep stakeholders informed about the status of Project-related activities.

Special construction works, such as disruptions in public roads or the cut-off of energy resources, will be communicated to stakeholders by Site Chief. This proactive communication approach ensures transparency and allows stakeholders to stay informed about construction activities and any potential impacts on their communities.

Operation

During the operation phase, the ESMS and related management plans developed during the ESIA process will continue to guide the Project activities. The ESMS will be structured to sustainably manage and mitigate the impacts on labour and working conditions, community health and safety, resettlement and economic displacement, transportation, and other relevant factors during this phase.

Stakeholder engagement activities will persist throughout the operation phase to ensure ongoing communication and transparency. Regular updates on Project-related activities will be provided to stakeholders to keep them informed and engaged.

Additionally, any special operations or activities that may have significant impacts, such as changes in operational procedures or expansion plans, will be communicated to stakeholders through various channels, including consultation by Site Chief, public announcements, and stakeholder meetings. This proactive communication approach aims to address any concerns and maintain positive relationships with stakeholders throughout the operation phase of the Project.

Table 9: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
Before Construction	Project Affected People (PAPs) Residents of the settlements in the Aol Vulnerable groups	ESIA Disclosure Project updates	The Mukhtars and settlements to be informed. Project website, Social media, Local and Regional media, When required copies of the disclosure package will be sent as an e mail or hard copies of the disclosure package will be sent via post mail.	Settlements of Seslikaya Emen Badak Zengen	Before construction	Smart
	PAPs Residents of the settlements in the Aol Vulnerable groups	Introduction of Site Chief of Smart and their responsibilities and contact details. Community Grievance Mechanism Employment opportunities Special needs of vulnerable groups	Consultation meetings, Training/workshops, Women-only focus group discussions.	Settlements of Seslikaya Emen Badak Zengen Project office as per the request of the PAPs	Before construction	Smart

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	PAPs Residents of the settlements in the Aol Vulnerable groups	Issues regarding community health, safety, and security Measures to be applied for the mitigation of traffic density due to construction works	Pre-construction surveys, The Mukhtars and settlements to be informed, Stakeholder consultations, Site Chief meetings.	Settlements of Seslikaya Emen Badak Zengen Project office as per the request of the PAPs	Before construction	Smart
	PAPs	Identification and assessment of economic displacement impacts Community development and livelihood restoration initiatives	Individual meetings, Focus groups meetings, Continuous communication with the Project Site Chief and CLOs, Community grievance mechanism.	Seslikaya village Zengen neighbourhood	Before construction	Smart
	Governmental Parties Municipalities Governors District authorities Academic institutions	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement and grievance mechanism process	Individual meetings, General meetings, Official correspondence, Mail, phone calls.	Institution visits Project office as per the request of the stakeholders	Biannual meetings When required	Smart

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	ESIZ (Other companies in ESIZ)	Cumulative economic displacement impacts and mitigation measures Coordination with relevant authorities on livelihood restoration strategies				
	Non-governmental Parties Press and media NGOs Businesses and business organisations Workers organisations	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement and grievance mechanism process	General Public meetings, Press releases, Information brochures, Audio-visual materials.	Institution visits Project office as per the request of the stakeholders	In each Project phase and when required	Smart
Construction	PAPs Residents within the Project Aol Vulnerable groups Local businesses	Construction updates and construction schedule Environmental and social awareness Construction phase E&S impacts Community health and safety issues such as traffic impacts Local employment Impact on livelihoods due to construction including ETL	General Public meetings, Continuous communication with the Project Site Chief, Women-only focus group discussions, Phone notifications, Social media, Press release, Grievance mechanism, Project website.	Settlements of Seslikaya Emen Badak Zengen Project office as per the request of the PAPs	Quarterly meetings in all affected settlements	Smart

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	Governmental intuitions National and local media Non-governmental institutions Business organisations YEKA (Other companies in YEKA)	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule Cumulative economic displacement impacts and mitigation measures Coordination with relevant authorities on livelihood restoration strategies	General information meetings, Press release, Institution visits, Grievance mechanism.	Institution visits Project office as per the request of the stakeholders	Biannual meetings When required	Smart
	PAPs Residents of the settlements in the Aol Vulnerable people	Community health and safety issues Measures to be applied for the mitigation of traffic density due to construction works	Post-construction surveys, Consultation meetings, Continuous communication with the Project Site Chief, Grievance records related to the traffic.	Settlements of Seslikaya Emen Badak Zengen	During construction and operation	Smart

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	PAPs	Identification and assessment of economic displacement impacts Community development and livelihood restoration initiatives	Individual meetings, Focus groups meetings, Continuous communication with the Project Site Chief and CLOs, Community grievance mechanism.	Seslikaya village Zengen neighbourhood	Quarterly meetings with PAPs	Smart
Operation	PAPs Residents of the settlements in the Project Aol Vulnerable groups	The transition process from the construction and operation phase Operation phase E&S issues, especially community health and safety	Consultation meetings, Workshops, Individual meetings, Press releases, Grievance mechanism, Information disclosure on national and local media, Brochures and information banners.	Settlements of Seslikaya Emen Badak Zengen Project office as per the request of the PAPs	Following the completion of the construction	Smart

Project stage	Target stakeholders	Topic(s) of engagement	Engagement Tools	Location	Frequency	Responsibilities
	Governmental and non-governmental bodies YEKA (Other companies in YEKA)	Environmental and social awareness Operation phase E&S impacts Community health and safety issues Operation phase updates Cumulative economic displacement impacts and mitigation measures Coordination with relevant authorities on livelihood restoration strategies	Information disclosure on national and local media, Brochures and information banners, Press releases, Grievance mechanism.	Institution visits Project office as per the request of the stakeholders	Following the completion of the construction	Smart
	PAPs (Affected households from Seslikaya village using Project site for grazing) PAPs (Affected individuals from ETL)	Monitoring of carrying capacity of the remaining pastureland Assessment of impacts on livelihoods Effectiveness of livelihood restoration initiatives Effectiveness of community development projects	Individual meetings, Focus group meetings, Consultation meetings, Continuous communication with the Project Site Chief and CLOs, Community grievance mechanism.	Seslikaya village Zengen neighbourhood	During the operation phase	Smart
	Vulnerable Groups	Lessons learnt during the construction phase if any. Re-confirming the households that are considered vulnerable during the construction phase.	Individual meetings, Consultation meetings, Continuous communication with the Site Chief Community grievance mechanism	Settlements of Seslikaya Emen Badak	During the operation phase	Smart

7.0 GRIEVANCE MECHANISM

IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (2009) defines a grievance as “a concern or complaint raised by an individual or a group within communities affected by company operations” (p. 8). 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.

The Community Grievance Mechanism is developed to handle any concerns or complaints from local communities regarding the Project activities. Its objective is to demonstrate responsiveness to stakeholder needs and establish a reliable relationship through the implementation of effective strategies aimed at addressing these issues. Similarly, the Worker Grievance Mechanism addresses employee concerns, promoting trust through promptly resolving work-related issues.

Smart will establish and implement Worker and Community Grievance Mechanisms in accordance with the requirements of IFC Performance Standards, catering to the needs of local communities and Project employees. The management of these mechanisms, along with implementing the SEP and engagement activities, will be overseen by a designated Site Chief. Additionally, a workers' representative will be chosen to advocate for and address employee concerns.

The Project-specific grievance mechanism will adhere to the following principles:

- **Proportionality:** The design and operation of the grievance mechanism will be tailored to the scale and potential risks of the Project.
- **Cultural Appropriateness:** The mechanism will be developed and operated in a manner that respects and considers the cultural sensitivities of the communities affected by the Project.
- **Accessibility:** The grievance mechanism will be easily accessible to all stakeholders, including marginalized individuals or those facing barriers, both physically and in terms of language and communication.
- **Transparency and Accountability:** Procedures for lodging grievances will be transparently communicated, and all actions taken will be documented and reported to relevant stakeholders.
- **Appropriate Protection:** Measures will be in place to protect the rights and identities of grievance submitters, ensuring the confidentiality of their information.
- **Gender Sensitivity:** The grievance mechanism will incorporate a gender-sensitive approach, effectively addressing concerns related to Gender-Based Violence and Harassment (GBVH) with utmost confidentiality, sensitivity, and support for affected individuals.

7.1 Governmental Grievance Mechanism – all stakeholders

The public can raise any issues, complaints, and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and government open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints and requests can be both received and responded to through this national online system.

7.2 Worker Grievance Mechanism

Smart is committed to ensuring a fair and transparent working environment for all individuals involved in our projects. To uphold this commitment, a Project-specific Worker Grievance Mechanism, accompanied by a comprehensive Grievance Mechanism Procedure will be implemented by Smart. This mechanism will be applicable to all direct and indirect project workers, ensuring that everyone has a platform to address their

concerns effectively. All contractor/subcontractor workers shall have access to the Worker Grievance Mechanism.

Key features of the Worker Grievance Mechanism include:

- Workers can submit grievances via forms, emails, or dedicated hotlines, with name or anonymously. These channels will be clearly communicated during recruitment and orientation sessions. All workers, including contractor and subcontractor employees, will receive regular training on the grievance mechanism.
- Grievances will be categorized based on their nature (e.g., workplace conditions, GBVH, safety concerns) and assigned to specific managers or personnel with the expertise to address the issue promptly.
- All grievances will be logged, acknowledged within seven days, and resolved within 30 business days wherever possible.
- In case requested, all grievance holders will have the right to remain anonymous and maintain their confidentiality. Any credentials of the grievance holder will not be disclosed by Smart without first ensuring their consent. If consent is provided, only the managers and personnel related to the specific grievance will be informed.
- The mechanism will provide a safe and confidential platform for workers to report concerns related to GBVH in the workplace, including sexual harassment, abuse, and discrimination. Grievance-handling personnel will be specifically trained to identify, handle, and address GBVH complaints appropriately. Smart will enforce a zero-tolerance policy for GBVH, with appropriate disciplinary measures for perpetrators and support services for affected workers, including counseling and referral to external resources if necessary.

7.3 Community Grievance Mechanism

This mechanism will be responsive to any concerns and complaints, particularly from affected stakeholders and communities, including those experiencing economic displacement or impacts on livelihoods due to restrictions on land use. Special attention will be given to training the designated staff involved in managing the grievance mechanism. The overarching aim of this grievance mechanism is to provide all stakeholders with the opportunity to obtain information about Smart's activities and facilities, deliver their complaints and requests in a structured and formal manner, and receive prompt, fair, and effective responses.

Smart will enhance the capacity to detect grievances by training all relevant personnel, including the CLOs and Project Site Chief, to actively identify community concerns during formal and informal engagements. Proactive outreach will be conducted to gather feedback from affected communities, including vulnerable groups and economically displaced individuals.

Multiple channels will be established for submitting grievances, including:

- Grievance forms available on the Project website, at the Project site, and at Mukhtars' offices in affected settlements.
- Dedicated phone lines and email addresses disclosed in this SEP and at the Project website, and shared with local communities.
- Informal channels, such as direct communication during community meetings or engagement activities, with staff trained to record verbal grievances accurately.

All grievances will be documented in a Grievance Log, including the stakeholder's name (if provided), contact details, grievance details, submission method, acknowledgment date, and resolution status.

Grievances will be categorized and allocated to the appropriate responsible entities for resolution. Affected stakeholders will receive timely responses, with acknowledgment within seven days and resolution (or updates on progress) within 30 business days. However, it is ideal for complaints of harms and damages to be resolved within a few days to avoid loss of livelihood. Grievances involving significant issues like property damage or injury will be addressed promptly, typically within seven days.

Grievances related to economic displacement, including those from livestock breeder households, will be specifically categorized and allocated to the appropriate responsible entities for resolution.

The resolution process will prioritize fairness and transparency, with periodic updates provided to the grievance holder if the resolution requires additional time. Specifically, nominated and trained members of staff will record grievance information in a grievance register.

The grievance mechanism will be widely announced to the public. Stakeholder meetings and information sessions will be organized to educate affected communities on how to use the grievance mechanism. Special sessions will target women and vulnerable groups to ensure accessibility and inclusion. The Project CLOs will act as a local point of contact to provide assistance with grievance submissions and offer information about the process, particularly in areas where literacy levels may be lower or internet access is limited. Additionally, these meetings will serve as a platform to update stakeholders on the progress of mitigation measures for land use restrictions and economic displacement.

The Project will organize quarterly grievance review meetings with affected communities to share trends in grievances, explain how issues were resolved, and gather feedback on the grievance mechanism's effectiveness to make continuous improvements.

8.0 MONITORING

Monitoring measures will be consistently applied across all phases of the Project to evaluate the adherence of the SEP to Project standards. The stakeholder engagement process of the Project will be monitored periodically, as indicated in Table 10. According to the outputs of the monitoring indicators, the SEP will be revised to incorporate required corrective actions at various stages of the Project.

The SEP will be periodically reviewed by Smart, and it will be updated as necessary during the Project activities. Monthly summaries, the statistics of the consultation activities and grievances will be provided to the senior management of Smart. Monthly summaries will be used to assess the following:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timeliness in responding (ongoing communication),
- Clarity and simplicity of the information provided,
- Impacts of Smart operations and Project activities; and
- Applicability and relevance of the information provided.

As implementation of a project progresses, new impacts may emerge, while other impacts may be eliminated. Smart will provide regular updates to stakeholders on Project environmental and social performance, including environmental measurement results and grievance resolution processes, as well as any changes to the schedule. In the event of significant changes to the Project that result in additional risks and impacts, particularly those affecting stakeholders, Smart will communicate information about these risks and impacts and consult with stakeholders on how to mitigate them.

A set of Key Performance Indicators (KPIs) has been established to monitor and evaluate the implementation of the SEP and guide updates and revisions of the document. These KPIs will assess the effectiveness of the stakeholder engagement process during the monitoring process.

Table 10: Key Performance Indicators (KPIs)

ID	KPI	Target	Monitoring Measure
Consultation and Information Disclosure			
SEP-KPI-01	Number of stakeholder engagement activities	Target of 100%	Frequency of Engagement Activities Documentation of Activities
SEP-KPI-02	Number or frequency of: <ul style="list-style-type: none"> ▪ Consultation records, ▪ Materials shared with the stakeholders (brochure, presentations), ▪ Meetings held, ▪ Participants attended the public consultation meetings, ▪ Visits to local authorities or other local stakeholders, ▪ Visits to the settlements affected by the Project activities, ▪ Newspapers to share the information, ▪ Any updates on the Project website, ▪ Any type of announcements (information banners, calls) 	Delivery of regular reports on the consultation activities	Reporting
Implementation of Grievance Mechanism			
SEP-KPI-03	Number of complaints/grievances received	Target of 100%	Grievance Register
SEP-KPI-04	Number of complaints/grievances responded to within targeted time frame	Target of 100%	Grievance Register
SEP-KPI-05	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Biannual (construction), Annual (operation) Target of 100% of grievances closed out to the satisfaction of grievance holder within the targeted time frame	Audit report

9.0 REPORTING

Throughout all Project phases and during the construction period, Smart will provide monthly summaries detailing grievances from internal and external stakeholders, queries, related incidents, and the status of corrective and preventive actions, consultations, and disclosure activities. These summaries will serve as a reference point for assessing the quantity and nature of grievances, if any, as well as Smart's effectiveness in addressing them promptly and effectively.

A Grievance Register will be developed and kept updated by the Site Chief regularly.

Project NTS and SEP will be published on the Project website and made available at the Mukhtars' offices.

Regular reporting will be developed and Project information will be disclosed on the Project's website to inform stakeholders, including but not limited to, the following:

- Project progress details,
- Environmental monitoring data results (waste, air, etc.)
- Resource utilisation,
- Human resource management (number of workers, women workers, local workers etc.),
- Occupational Health and Safety,
- Stakeholder Engagement
 - Meeting or other initiatives to engage with members of the public or public organisations during the report period,
 - Information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues,
 - Coverage in media,
 - Interaction with any environmental or other community groups, NGOs etc., and
 - Grievances that the Project received from the stakeholders during the reporting period.

Table 11 presents monitoring time frames for reporting requirements.

Table 11: Monitoring Time Frame

Monitoring Type	Frequency	For	Content
Reporting	Monthly	Project management	Detailed records of all stakeholder engagement activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting	Annually (quarterly for the first year of operation)	Project management	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Performance Monitoring	Biannual	Project management	Summarising progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of stakeholders/PAPs consultations/meetings
Impact Monitoring	Biannual	Project management	Summarising assessment of progress towards living standard restoration, livelihood restoration; identification of any areas of non-compliance and agreed corrective actions

Reporting Back to Stakeholder Groups

The stakeholder engagement reporting process consists of two main components: consultation and information disclosure, and the grievance mechanism. To ensure stakeholder involvement in reporting Smart will adopt the following practices:

- **Monthly Reports:** Prepared by the Project Site Chief, these reports will detail engagement activities, grievance records, including the number of grievances received, their types, resolution status, and response timelines. Summaries of these reports will be communicated to affected communities through community meetings facilitated by CLOs on a quarterly basis. Key findings from the monthly reports will also be published on the Project website to ensure transparency and accessibility.
- **Annual Environmental and Social Reports:** These reports will provide comprehensive details of public engagement initiatives, information disclosure activities, media coverage, and grievance statistics. Hard copies will be distributed to mukhtars, who will share the information with their communities. In addition, CLOs will organize annual feedback sessions in affected villages to review the report with community members, gather feedback, and discuss any concerns or suggestions for improvement. All stakeholders will have access to the annual reports through the Project website.

By incorporating regular, face-to-face communication and actively involving mukhtars and CLOs, the Project will ensure that affected communities are kept informed and engaged.

10.0 ROLES AND RESPONSIBILITIES

During the construction phase of the Project, the following roles and responsibilities presented in Table 12 will be implemented by Smart.

Table 12: Roles and Responsibilities

Position	Responsibilities
Project Manager	Approve this Plan. Ensure adequate resources are provided. Manage all project resources. Ensure quality results and project success. Manage Suppliers.
HSE Coordinator	Ensure health and safety practices are implemented, by workers and sub-contractor. Coordinate HSE team.
QA Coordinator	Ensure quality assurance.
Site Chief	Ensure adequate resources are provided with respect to Project requirements. Ensure that this Plan is compliant with the national and international requirements and the Project's applicable standards. Monitor the Environmental and Social performance of the Plan at the Project level. Develop a detailed project plan including timelines. Manage Subcontractors, Coordinate installation and inspection. Manage the corporate communication strategy for stakeholders, attend meetings with the stakeholders if required, and ensure compliance with the SEP. Ensure Stakeholder Engagement and GRM are understood by all employees.
Community Officers (CLOs) Liaison	Implementation of this SEP and the Grievance Mechanism. Conduct stakeholder engagement activities including regular engagement activities and activities for livelihood restoration activities, Review the grievance tracking system weekly.

Position	Responsibilities
	<p>Prepare monthly reports on the grievances and the stakeholder engagement activities monthly.</p> <p>Work in cooperation with other departments to determine targets for Environmental, Social, health and safety issues</p> <p>Keep the record of the grievances in the Request and Grievance Register with details (raised by who, date, status (open, awaiting or closed) etc.).</p> <p>Ensure all grievance holders are informed within one week, and grievances are resolved within one month.</p> <p>Provide regular reporting back to the community on the community grievances.</p> <p>Record all formal and informal engagement activities with local communities in the stakeholder management system.</p> <p>Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted into stakeholder engagement quarterly reports.</p> <p>Monitor and record the social responsibility activities carried out in the scope of the Project, and these records will be inserted into stakeholder engagement quarterly reports.</p>
HSE Expert	Ensure health and safety practices are implemented, by workers and sub-contractor.
Senior Site Engineer	<p>Manage, improve, monitor, and update this Plan.</p> <p>Ensure technical support is provided to contractors for implementation of the Plan.</p> <p>Ensure the execution of the outsourced (contracted) activities in their responsibility areas pursuant to this plan and depending on plans/procedures.</p> <p>Ensure that training related to this Plan is organized and employees on each level and tasks are trained on this Plan.</p> <p>Engage and inform local communities about Project implementations that would impact them and assist in delivering the Stakeholder Engagement activities.</p> <p>Keep in constant contact with nearby settlements and ensure that grievances, if any, are recorded, resolved in a timely and appropriate manner in collaboration with human resource/personnel affairs and corporate communication teams.</p> <p>Conduct/organize periodic audits.</p> <p>Coordinate electrical, mechanical, and mapping teams.</p>
QA/QC Engineer	Check the quality of materials and the construction process.
Reporting Engineer	<p>Record Key Performance Indicators (KPI), non-compliances, propose corrective actions (if required) and follow-up of the actions.</p> <p>Ensure all relevant topics followed are reported to Project Management Team.</p> <p>Obtain data from sub-contractors regarding activities defined in this Plan.</p> <p>Organize trainings related to this Plan.</p> <p>Conduct periodic internal audits.</p> <p>Obtain the appropriate permits or permission from the local or national authorities prior to initiating activities (if required).</p> <p>Conduct periodical site visits/audits to waste disposal/recycling/reuse facilities to visually confirm that the Project wastes are being managed in an environmentally responsible manner.</p> <p>Prepare daily and weekly reports of electrical and mechanical progress</p>
Design Engineer	Design an electrical, a mechanical, and a static project and direct the site team about starting construction according to the project.
Administration Officer	<p>Coordinate security of team and materials.</p> <p>Coordinate meals.</p> <p>Coordinate cleaning of offices, restrooms etc.</p>

Position	Responsibilities
	Coordinate shuttle services.
Storage Responsible	Manage storage and stocks.
All Personnel	Participate in the trainings. Ensure compliance with measures defined in this Plan.

11.0 LIABILITIES

A team was assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management for the construction phase of the Project.

Project website: <https://www.smartsolar.com.tr/iletisim.aspx>

Address: Rüzgarlıbahçe Mah., Feragat Sk. Energy Plaza No:2, 34805 Beykoz/İstanbul

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For the grievances and the requests related with the Project please contact:

oneri@smartsolar.com.tr,

sikayet@smartsolar.com.tr

12.0 REFERENCES

- **IFC Performance Standards 2012:**
https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance_Standards
- **Equator Principles 2020**
<https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>

Signature Page

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