

# MACOM

ENVIRONMENT & ENERGY

## MUTLU WPP 5 WIND POWER PLANT AND SOLAR POWER PLANT PROJECT PROJECT

### GRIEVANCE MECHANISM PLAN

**Plan Code**  
**GMP-2015630-01**

**Owner of Activity**  
Mutluer Enerji Üretim Yatırım  
İnşaat Madencilik Sanayi ve  
Ticaret A.Ş.

**Date**  
**22.03.2024**



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SCOPE OF PLAN: GRIEVANCE MECHANISM PLAN

### Owner of Activity

Mutluer Enerji Üretim Yatırım İnşaat  
Madencilik Sanayi ve Ticaret A.Ş.

### Location of Activity

Selçuklu, Konya - Türkiye

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### Plan Issuance History

Version	Explanation	Date
1	Plan Presentation	22.03.2024

**Date of Plan** : 22-Mar-2024  
**Plan Code** : GMP-2015630-01

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## DICTIONARY AND ABBREVIATIONS

Word	Description
EBRD	: European Bank for Reconstruction Development
EHS	: Environmental Health and Safety
ESIA	: Environmental and Social Impact Assessment
EP	: Equator Principles
EPFI	: Equator Principles Financial Institution
GIIP	: Good International Industry Practice
GMP	: Grievance Mechanism Plan
IFC	: International Finance Corporation
KVKK	: Law on Protection of Personnel Data
PS	: Performance Standards
PRS	: Public Relations Specialist
SPP	: Solar Power Plant
TSKB	: Türkiye Sınai Kalkınma Bankası (Industrial Development Bank of Türkiye)
WB	: World Bank
WPP	: Wind Power Plant

## **1. INTRODUCTION**

To ensure the sustainability of environmental and social issues, a grievance mechanism that includes both internal and external stakeholders is necessary for each project. The Grievance Mechanism aims to address the concerns and complaints of all stakeholders promptly through a culturally appropriate, accessible, understandable, and transparent consultation process.

This Grievance Mechanism Plan (GMP) has been prepared for the Solar Power Plant, which serves as an auxiliary resource to the Mutlu WPP 5 Wind Power Plant. The Project operates within the administrative boundaries of Selçuklu District, Konya Province. This Plan, prepared by MACOM Environment Energy and Technology Investments Limited Company (MACOM), aims to establish the framework of the Grievance Mechanism related to the Solar Power Plant.

The Mutlu WPP 5 Project, with an installed capacity of 46.8 MWm/44 MWe, aims to utilize solar energy as another renewable energy source. In this context, it is planned to install auxiliary resource PV units with an installed capacity of 25 MWm/25 MWe in addition to Mutlu WPP 5. The integration of the PV, planned not to exceed the license power of the main source, aims to increase the total power to 71.8 MWm/44 MWe. The solar power plant, which will operate as an auxiliary resource, was granted an Environmental Impact Assessment (EIA) Positive Decision on 11.02.2022 with the number 6562.

This Plan aims to define the framework of the grievance mechanism for Mutlu WPP 5 and SPP in accordance with national legislation and international standards. This Plan is a living document and should be reviewed annually and updated as necessary. This Plan has been prepared in response to a request from the Industrial Development Bank of Türkiye (TSKB-Türkiye Industrial Development Bank) (Lender).

The potential impacts of the Project on sensitive receptors have been assessed in accordance with national regulations in Türkiye, the World Bank/International Finance Corporation (WB/IFC) Performance Standards and European Bank for Reconstruction and Development (EBRD) Requirements. Mitigation measures to minimize potential adverse effects on sensitive receptors are included in this Plan.

### **1.1 Scope of the Plan**

This Grievance Mechanism Plan has been developed to more effectively manage interactions with the Company's internal and external stakeholders and to address and resolve their concerns, anxieties, and grievances. Designed specifically for the Mutlu WPP 5 and SPP Project, this GMP aims to provide a comprehensive and participatory approach.

The primary focus of this Plan is to ensure the grievance mechanism is both transparent and culturally acceptable, easily accessible, and understandable. This mechanism ensures that the voices of all individuals impacted by the project are heard and their concerns are taken seriously.

Another key aspect of the plan is the systematic recording and analysis of requests, suggestions, and grievances expressed by those affected by the Project. This approach is critical in understanding the true needs and expectations of the communities affected by the Project.

Additionally, maintaining the grievance mechanism in accordance with national and international standards allows individuals impacted by the Project to comfortably convey their grievances within these frameworks. This supports a fair and inclusive grievance process.

Special attention is also paid to the needs of vulnerable groups within the framework of the plan. This creates a platform where representatives of these groups can voice their concerns and suggestions regarding the Project freely.

The Plan also aims to contribute to environmental and social sustainability. This is crucial for the long-term success of the project and ensures steps are taken towards a sustainable future.

The objective and effective handling and resolution of grievances are fundamental to the plan. This ensures the grievance process is not only present but also operates effectively and justly.

Finally, the monitoring, evaluation, and reporting of the grievance process promote continuous improvement and development. This supports the dynamic and adaptable nature of the plan, allowing it to respond to changing needs over time.

This GMP is dedicated to contributing to the successful implementation of the Project by building strong and meaningful relationships with stakeholders.

## **1.2 Objective of the Plan**

This GMP aims to protect the interests of individuals and institutions affected by the Mutlu WPP 5 and SPP Projects, and to address requests, suggestions, and grievances related to the Project activities through the grievance mechanism. The main objectives of the GMP are as follows:

- To ensure transparent, culturally acceptable, easily accessible, and objective evaluation of requests, suggestions, and grievances.
- To take necessary measures for requests, suggestions, and grievances, and manage these processes.
- In cases where identified requests, suggestions, and grievances encompass other institutions, to seek solutions in collaboration with these institutions, within the limits allowed by the privacy policy.
- To be in continuous consultation with individuals or institutions that submit requests, suggestions, and grievances, and take their opinions into account.
- To develop effective methodologies for requests, suggestions, and grievances.
- To create appropriate platforms for all individuals and institutions affected by the project to express their views and concerns.
- To ensure the active participation of individuals and institutions affected by the project in the process.
- To develop applicable and effective solutions for requests, suggestions, and grievances.

Additionally, this Plan describes a mechanism created for addressing the grievances of all project employees and stakeholders and for taking necessary resolution steps. The commitment and approach of the Project are based on addressing all grievances and comments that may arise directly or indirectly as a result of the Project's environmental and social performance. The GMP does not replace stakeholder engagement activities but rather plays a complementary role.

This Plan encompasses all grievances raised by internal and external stakeholders, including the activities of contractors, and is part of the management plans developed for the Project. This Plan allows for the continuous updating of Project activities according to the expectations and needs of the stakeholders, thereby enhancing the transparency and inclusivity of the Project process.

## 2. LEGAL FRAMEWORK

In this GMP, the objectives of the Mutlu WPP 5 and SPP should be following the following Legislation and Performance Standards and Requirements.

- 1) National Legislations,
- 2) International Finance Corporation (IFC) Performance Standards and Environmental Health and Safety Guidelines,
- 3) World Bank Environmental and Social Standards (ESS),
- 4) European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy Performance Requirements.

The subsequent section provides comprehensive details on the applicable National Legislation, Equator Principles, IFC Performance Standards, World Bank's ESS, and the EBRD Performance Requirements.

### 2.1 National Legislations

National legislations provide guidance in complying with the laws of that country during the establishment of grievance mechanisms. A summary of the national laws related to the grievance mechanism of the Republic of Türkiye, the nation in which Mutluer Enerji will operate, is as following;

**Law on Protection of Personnel Data (KVKK):** KVKK governs the handling, storage, and safeguarding of personal data, which encompasses information linked to individuals' identities. The purpose of KVKK is to prevent unauthorized and inappropriate use of personal data. Individuals can file complaints concerning their personal data in accordance with this law.

**Labor Law:** Labor Law regulates labor relations, covering topics such as workplace rights, wages, leave policies, and termination procedures. Any complaints related to workplace injustices or issues must adhere to the Labor Law. Employers are also bound by this law in their actions.

**Consumer Rights Law:** This law safeguards consumer rights and interests, addressing concerns like product or service problems, defective products, and deceptive advertising. If situations infringe upon consumer rights, individuals can file complaints in line with this law.

**Administrative Procedure Law:** This law outlines legal procedures for challenging administrative actions and conducting administrative judicial processes. Complaints pertaining to public institutions or administrative procedures should be addressed following this law.

**Turkish Penal Code:** The Turkish Penal Code deals with criminal offenses and corresponding penalties. Complaints sometimes involve criminal matters, and this law dictates the procedure for reporting and addressing such cases.

**Right to Information Law:** This law, under the principles of transparency, equality, and impartiality, grants everyone the right to access information about public institutions and professional organizations.

Each law contains comprehensive provisions within its respective domain and offers specific guidelines and processes for filing grievances. For more detailed information on a specific type of complaint, it may be necessary to review the relevant law on that subject.



Additionally, seeking guidance from legal professionals or attorneys is advisable for legal matters.

Additionally, the Constitution of the Republic of Türkiye contains articles that should be taken into consideration when establishing and be put into use the grievance mechanism. The summary of these items is as follows:

#### **X. Legal Equality**

**Article 10:** This article ensures legal equality, prohibiting discrimination based on factors such as language, race, gender, political beliefs, or religion. It also emphasizes gender equality and non-discrimination.

#### **II. Prohibition of Forced Labor**

**Article 18:** Prohibits forced labor and the collection of money from workers by employers.

#### **VII. Freedom of Thought and Opinion**

**Article 25:** Guarantees freedom of thought and expression, shielding individuals from coercion or prosecution for their views.

#### **VIII. Freedom of Expression and Dissemination**

**Article 26:** Enshrines the right to express and disseminate thoughts and opinions through various means without interference from official authorities.

#### **VII. Right to Petition**

**Article 74:** Grants Turkish citizens and foreign residents the right to submit written petitions and complaints to competent authorities and the Grand National Assembly of Türkiye, both on their behalf and public matters.

#### **Petition Right Exercise Law**

**Article 3:** Of this law affirms everyone's right to submit written petitions and complaints to the Grand National Assembly of Türkiye and relevant authorities regarding themselves or public matters.

#### **Overtime Work**

**Articles 41 and 42:** Address overtime work, stating that it requires the employee's consent, except in exceptional cases like malfunctions or urgent work. Mandatory overtime should not exceed what's necessary for normal operations.

#### **Working Age and Child Labor Prohibition**

**Article 71:** Prohibits the employment of children under the age of fifteen but allows those aged fourteen or older, who have completed primary education, to be employed in light work that doesn't hinder their development.

## **2.2 International Finance Corporation (IFC) Performance Standards and Environmental Health and Safety Guidelines**

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHS Guidelines to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. Performance Standards established by IFC are as following;

- Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2 Labor and Working Conditions
- Performance Standard 3 Resource Efficiency and Pollution Prevention
- Performance Standard 4 Community Health, Safety and Security
- Performance Standard 5 Land Acquisitions and Involuntary Resettlement
- Performance Standard 6 Biodiversity Conservation and Sustainability Management of Living Natural Resources
- Performance Standard 7 Indigenous Peoples
- Performance Standard 8 Cultural Heritage

Performance Standard 4 and Performance Standard 7 from the IFC Performance Standard are particularly important in the Grievance Mechanism Plan.

- Performance Standard 4 Community Health, Safety and Security: Recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration and/or intensification of impacts due to project activities. While acknowledging the public authorities' role in promoting the health, safety, and security of the public, this Performance Standard addresses the client's responsibility to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related activities, with particular attention to vulnerable groups.
- Performance Standard 7 Indigenous Peoples: Indigenous people's active participation and benefit in project activities can help local people's economic and social development. Thanks to this standard, local people; It is aimed to respect human rights, dignity, goals, culture, livelihoods, not to be affected by the risks and impacts that may arise due to the project activities or to be affected at a minimum level.

However, Grievance Mechanisms are defined by IFC's Environmental and Social Management System Toolkit Report. According to IFC, the Grievance Mechanism is a channel for affected community members to raise questions, concerns or formal grievances openly, confidentially or anonymously, and is an alternative way for community members to communicate with the Company as part of the formal stakeholder engagement process.

### **2.3 The World Bank Environmental and Social Standards**

One of the conditions that must be utilized in Grievance Mechanism Plan is the The World Bank Environmental and Social Standards. The World Bank Environmental and Social Standards considers the design, implementation and operation of projects as a duty and responsibility within the framework of the relevant. This Standards prepared for the said policies guide the activity owner Company in determining the risks and impacts of the project and provide guidance on preventing and reducing risks and impacts. The World Bank Environmental and Social Standards are as follows:

- Environmental and Social Standard 1 Assessment and Management of Environmental and Social Risks and Impacts
- Environmental and Social Standard 2 Labor and Working Conditions
- Environmental and Social Standard 3 Resource Efficiency and Pollution Prevention and Management
- Environmental and Social Standard 4 Community Health and Safety
- Environmental and Social Standard 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- Environmental and Social Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Environmental and Social Standard 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- Environmental and Social Standard 8 Cultural Heritage
- Environmental and Social Standard 9 Financial Intermediaries
- Environmental and Social Standard 10 Stakeholder Engagement and Information Disclosure

Of the World Bank Environmental and Social Standards, Environmental and Social Standard 10 Stakeholder Engagement and Information Disclosure is particularly important in the Grievance Mechanism Plan.

- Environmental and Social Standard 10 Stakeholder Engagement and Information Disclosure: Stakeholder Engagement and Information Disclosure recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

## **2.4 European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy Performance Requirements**

One of the conditions that must be utilized in GMP is the EBRD Environmental and Social Policy Performance Requirements. The EBRD Environmental and Social Policy considers the design, implementation, and operation of projects as a duty and responsibility within the framework of the relevant Policy and Performance Requirements. The Performance Conditions prepared for the said policies guide the project owner Company in determining the risks and impacts of the project and provide guidance on preventing and reducing risks and impacts. The EBRD Environmental and Social Policy Performance Requirements are as follows:

- Performance Requirement 1 Assessment and Management of Environmental and Social Risks and Impacts
- Performance Requirement 2 Labour and Working Conditions
- Performance Requirement 3 Resource Efficiency and Pollution Prevention and Control
- Performance Requirement 4 Health Safety and Security
- Performance Requirement 5 Land Acquisition, Involuntary Resettlement and Economic Displacement
- Performance Requirement 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Requirement 7 Indigenous Peoples
- Performance Requirement 8 Cultural Heritage
- Performance Requirement 9 Financial Intermediaries
- Performance Requirement 10 Information Disclosure and Stakeholder Engagement

Of the EBRD Performance Requirements, Performance Requirement 4, Performance Requirement 7, and Performance Requirement 10 is particularly important in the Grievance Mechanism Plan.

- Performance Requirement 4 Health Safety and Security: This Performance Requirement addresses the responsibility of public authorities to identify the client while recognizing the role of public authorities in promoting the health, safety and security of the public. It aims to prevent or minimize risks and negative effects on public health, safety and security that may arise from project activities.
- Performance Requirement 7 Indigenous Peoples: Indigenous peoples are required to have the right to participate in and benefit from the activities related to the project, and to develop the local people economically and socially with the rights offered. This Performance Requirement stipulates that local communities should be approached as partners; sees local peoples as people who can make great contributions to socio-economic development.

- Performance Requirement 10 Information Disclosure and Stakeholder Engagement: This Performance Requirement recognizes the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. Such engagement is also a way of improving the environmental, social, and overall sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable environmental and social performance, and can lead to improved financial, social, and environmental outcomes, together with enhanced community benefits.

The mention of health and safety measures for the public in the performance standards undoubtedly reveals the importance of the public. In Grievance Mechanisms, the importance of people's communication of their requests, suggestions and grievances is emphasized. In this context, it is possible for the public to resort to Grievance Mechanisms in cases where they do not feel safe in terms of health and safety.

EBRD has established a project Grievance Mechanism by Public Reporting and Accountability. project Grievance Mechanism It has been designed as a mechanism where local individuals, organizations and groups who have the perception that they will be harmed by the Bank's project can report their grievances and seek help in order to solve the problem independently of the bank operations. However, there is the EBRD's Guidance Note on the project Grievance Mechanism. In this Guidance Note, the EBRD shares the requirements for the Grievance Mechanism, the basic principles to be applied in defining the process, and provides examples of grievance forms, databases, and management flowcharts.

### 3. GRIEVANCE BACKGROUND

In the consultations with the Company, it was concluded that in case of a grievance, the local people and employees convey this situation to the Facility Manager. It was reported that if victimization is detected, solution processes will be initiated. It was also stated that grievance boxes were left at the mukhtar's offices of Meydanköy Neighborhood and Çaltı Neighborhood, and the boxes were checked periodically, but no grievances have been received to date. Images of the grievance boxes in question are shared below (Photograph 1 and Photograph 2).



Photograph 1: Meydanköy Neighborhood Mukhtar's Office Grievance Box



Photograph 2: Çaltı Neighborhood District Mukhtar's Office Grievance Box

As a result of the interviews held with the neighborhood mukhtars and employees during the field visit, it was concluded that there has been no victimization regarding the Company's activities to date. Both mukhtars and employees stated that in case of a grievance, they would forward it to the Facility Manager. The Facility Manager stated that there is no grievance box established in the facility and that they have not recorded grievances yet. During the field visit, it was observed that the grievance mechanism was missing.

## **4. GRIEVANCE MECHANISM**

### **4.1 Grievance Process and Procedures**

In the projects conducted by Mutluer Enerji, there are various stakeholder groups such as the local community, Company employees, public institutions, civil society organizations, and the media. These stakeholders are vital for the successful execution and sustainability of the Project. Each stakeholder group can be affected differently by various aspects of the Project; hence a comprehensive mechanism is required to effectively convey their concerns, suggestions, and grievances.

To meet this need, Mutluer Enerji should establish a mechanism that allows stakeholders to voice their concerns and share their issues. This mechanism will function as a transparent and accessible grievances and suggestions system. All concerns, suggestions, and grievances will be seriously considered and appropriately addressed by the Company.

The management of the grievances and suggestions process will be conducted by a Public Relations Specialist, specially appointed by the Company. This responsible individual will record, monitor, and convey the requests, suggestions, and grievances submitted by stakeholders to the relevant Company units. This process is designed to ensure effective communication between the company and its stakeholders and to understand their concerns.

Feedback from stakeholders will be used for the continuous improvement and development of the Project. In this way, Mutluer Enerji will be able to adjust its projects more effectively to meet the needs and expectations of the local community and other stakeholders. Additionally, this process will enhance the Company's awareness of social responsibility and enable better management of the environmental and social impacts of its Projects.

These comprehensive grievance and suggestions mechanism will ensure that Mutluer Enerji remains in constant interaction with its stakeholders and contributes to the successful execution of its Projects. In order to handle concern and grievances in a qualified manner, it is necessary to pay attention to certain procedures. These situations can be listed as follows:

- The grievance mechanism will be effective during the construction, operation, and decommissioning phases of the Project.
- Importance will be placed on ensuring that the grievance mechanism to be established is proportionate, culturally appropriate, transparency and accountability, accessibility, and appropriate protection.
- An announcement will be made about the Grievance Mechanism system during the construction phase, and affected communities and employees will be informed about the grievance mechanism during the stakeholder engagement period.
- A Public Relations Specialist will be appointed by the Company to deal with grievances. It will be ensured that the expert in question receives the necessary training on the subject.
- Public Relations Specialist's name and contact details should be provided to local people, Company workers, public institutions, non-governmental organizations.
- The grievance mechanism will aim to identify people harmed by the Project activities at an early stage and to resolve the damages urgently. In this way, grievances will be learned, and it will help to resolve them.
- All incoming grievances and requests will be responded to and managed accordingly.
- The person/persons who submit their grievances will not face any worth or sanctions. Feedback will be provided without any penalty.



- Request, Suggestion and Grievance Form (for both internal and external stakeholders) Request, Suggestion, Grievance Registration Form and Grievance Closing Form will be created. The above-mentioned sample forms will be shared in the Appendix 1, Appendix 2 and Appendix 3.
- Phone number, e-mail address, website information will be shared belonging to the grievance mechanism in the settlements around the Project area. The same information will also be available on the Company's website.
- Stakeholders can also submit their grievances via the site if they wish. In this way, especially those who are illiterate, the elderly in need of care, those who do not want to state their name and surname, etc. It will also help vulnerable people to convey their grievances.
- The grievance mechanism line will also accept confidential numbers.
- Braille texts will be posted on grievance mechanisms for visually impaired people for informational purposes.
- Grievance forms will be prepared accordingly if there is a second language commonly used in villages and neighborhoods.
- The Company will place "Request, Suggestion and Grievance" boxes in the settlements. request, suggestion, and grievance forms will be left on the sides of the boxes at regular intervals. The boxes and forms in question will be kept in places such as coffee houses, mukhtar's offices, village mansions.
- The Company will create a Request Suggestion Grievance Registration Form and record the grievances in the computer environment.
- Each grievance will be taken into consideration and the person making the grievance will definitely be responded to. The replies in question will be in accordance with the framework of official procedures and the Law on the Protection of Personal Data.
- The following information should be obtained regarding each grievance.
  - Receipt notification
  - Record of the grievance
  - Received Name and contact information, if shared by the complainant
  - The nature of the grievance
  - If a meeting is necessary, people who will attend the meeting.
- All grievances will receive feedback within a maximum of 10 calendar days that the grievances have been processed. All grievances will be resolved within a maximum of 30 working days. If the grievance cannot be resolved within this period, the reason for the extension will be explained to the complainant.
- Requests, suggestions, and grievances can be anonymous. In such cases, grievances will be considered, and necessary procedures will be implemented.
- If the grievances are verbal, the grievance will be recorded, and feedback will be given to the person that the grievance has been recorded.
- The solutions decided because of the grievance will be documented concretely.
- In case of agreement with the complainant, Grievance Closing Form will be filled.
- If the complainant is not satisfied with the measures taken, a mutual solution will be sought with the representatives of the local community. However, if the grievance cannot be resolved, other reconciliation and legal solutions will be sought.
- All grievances, including anonymous grievances, will be kept confidential.
- If serious allegations are confirmed, the problem will be resolved by working with independent mediators.
- The effectiveness of the system will be constantly monitored request, suggestion and grievance resolution stages are shared visually below (Figure 1).



Figure 1 : Request, Suggestion and Grievance Resolution Stages

## **4.2 Grievance Mechanism Communication**

A specialized Grievance Mechanism has been developed for collecting grievances from external stakeholders in the communities surrounding the Mutlu WPP 5 and SPP Projects. This mechanism's operation process includes detailed procedures on how to submit grievances, where the Request, Suggestion, and Grievance boxes will be placed, how these boxes should be used, and the methods for filling out the Request, Suggestion, and Grievance forms.

This process will be thoroughly explained to the local communities through dedicated visits. During these visits, handbooks or brochures prepared specifically for the local population will be distributed, providing information about the mechanism's operation. Additionally, these brochures and handbooks will be shared with the public, ensuring that everyone understands how the mechanism works.

Furthermore, other stakeholders will also be visited and informed about the mechanism's operation. The prepared handbook and brochures will be shared with these stakeholders, ensuring that all relevant parties understand the process and can effectively participate.

Considering that Company employees might also have requests, suggestions, and grievances, a specific process has been designed for the collection of internal grievances. Employees will be trained on the operation of the Grievance Mechanism, how to submit grievances, and where to find the Request, Suggestion, and Grievance boxes. For those working on the construction site, Request, Suggestion, and Grievance boxes, as well as forms, will be made available and placed in accessible locations.

This detailed and comprehensive Grievance Mechanism aims to establish an effective communication and feedback channel for communities surrounding the Mutlu WPP 5 and SPP Project and for Company employees. This process is intended to contribute to the successful execution of the projects and ensure that the voices of all stakeholders are heard, thus building a process that contributes to the overall success and sustainability of the Project.

## **4.3 Responsibilities**

The Grievance Mechanism established within the scope of Mutlu WPP 5 and SPP projects serves as an effective communication and conflict resolution tool. The main areas of responsibility of this mechanism are detailed below:

- Involvement in decision-making processes related to Mutlu WPP 5 and SPP activities,
- Recording all incoming requests, suggestions, and grievances, and providing an official response to each,
- Evaluating all received requests, suggestions, and grievances,
- Facilitating timely resolution of issues to prevent their escalation into social conflicts, maintaining continuous communication with grievance owners, and providing regular updates on the grievance handling process,
- Keeping a record of all activities related to grievances and preparing regular reports,
- Ensuring the confidentiality and privacy of grievance owners and handling grievances discreetly,

- Serving as an accountability mechanism where people can seek assistance when needed,
- Participating in the project's monitoring and evaluation process to contribute to organizational learning,
- Conducting training and awareness activities about the grievance mechanism for company employees and relevant stakeholders,
- Continuously reviewing and improving the grievance mechanism.

Mutlu Enerji is responsible for evaluating requests, suggestions, and grievances, implementing identified activities, managing, and monitoring them. A Public Relations Specialist appointed by the company will be the primary responsible party for handling requests, suggestions, and grievances.

The requirements stated in this Grievance Mechanism Plan apply to all Project activities, including grievances related to activities conducted by contractors. Mutlu Enerji will develop detailed operational procedures to determine specific instructions for the implementation of the requirements in this Grievance Mechanism Plan.

## **5. MONITORING AND REPORTING**

This GMP will be regularly reviewed and updated as necessary within the scope of Mutlu WPP 5 and SPP. The processes of requests, suggestions, and grievances will be continuously monitored, and the effectiveness of these processes will be reported to the senior management of the Company.

During the monitoring of the Plan, a comprehensive assessment will be conducted on compliance with the objectives and the established requirements. This review will consider data records, activities, and audit results, identifying potential areas for development of the Plan and documenting the outcomes.

In the monitoring and evaluation process, special attention will be given to stakeholders and vulnerable groups affected by the plant's activities. All actions conducted under the GMP will be meticulously recorded and shared with relevant institutions as necessary, in accordance with privacy policies.

At every stage of the request, suggestion, and grievance processes, stakeholders' perceptions of the process's effectiveness can be queried. Although the specific questions asked may vary depending on the stakeholders, they will generally cover the following topics:

- Was the process conducted in a transparent, comprehensible, and clear manner when submitting your request, suggestion, or grievance?
- Was the process culturally suitable for your situation?
- Were you provided with pertinent information concerning your requests, suggestions, and grievances?
- Did you receive feedback on your requests, suggestions, and grievances, and were you kept informed about the process?
- Do you believe you received prompt responses to your requests, suggestions, and grievances, and were these responses pertinent to the subject matter?
- Do you consider the information you received regarding your requests, suggestions, and grievances to still be valid?
- Were your requests, suggestions, and grievances satisfactorily resolved?
- If your requests, suggestions, and grievances have not been resolved, what actions do you believe should be taken?

The responses to these questions will be used to assess the effectiveness of the Grievance Mechanism. If the mechanism is found to be ineffective, a detailed review will be conducted, and necessary improvements will be suggested.

This Plan is designed to aid in the Company's continuous improvement and to demonstrate a responsive approach to the needs of stakeholders. Therefore, its ongoing update and development are essential.

## **6. CONCLUSION**

This Grievance Mechanism Plan is part of an approach aimed at reducing environmental and social risks for the Mutlu WPP 5 and SPP. The primary objective of the Plan is to define the mechanisms for effectively addressing grievances from both internal and external stakeholders, and to establish principles for integrating these mechanisms within the organization.

This Plan is designed to ensure that all feedback and grievances related to the Mutlu WPP 5 and SPP are assessed transparently, fairly, and swiftly, followed by the implementation of necessary measures. It clearly outlines the processes, responsibilities, and expectations for both external stakeholders and internal ones.

The Grievance Mechanism Plan aims to optimize stakeholder participation and feedback by ensuring that the Project's management process is transparent, culturally sensitive, easily accessible, impartial, and participatory. This system will address potential demands, suggestions, and grievances arising at various stages of the Project, tackling these issues with a solution-focused approach. The goal is to maximize the positive environmental and social impacts of the project while minimizing the negatives. The Plan intends to gain stakeholder trust and support by adhering to principles of clarity, collaboration, and communication.

This Grievance Mechanism Plan plays a critical role in achieving the Project's environmental and social sustainability goals. When implemented effectively, the Project can develop in harmony with the community it serves and encourage stakeholder participation. This system not only resolves complaints but actively listens to and incorporates stakeholder suggestions and opinions into the Project's development process. The wishes, suggestions, and grievances expressed by stakeholders will play a significant role in shaping the Project's operations.

The Grievance Mechanism Plan will enable stakeholders, especially individuals from vulnerable groups, to communicate their requests, suggestions, and grievances in a more effective and qualitative framework. This will contribute to both the well-being of the employees and the efficiency of the Project, as well as ensure continuous improvement and early detection of issues.

In conclusion, the success and sustainability of the Project are heavily dependent on the desires, recommendations, and grievances of those affected by and involved in it. The grievance mechanism encourages stakeholder participation, demonstrates the importance of their opinions, and enhances the transparency of the Project. Increased stakeholder trust and involvement in the Project can lead to greater public acceptance and success. This trust, in turn, can increase the Project's acceptance and success in the public eye. Additionally, the Plan guarantees the continuous improvement of the Project and ensures early detection of issues through the grievance system.

## Appendix 1 – REQUEST, SUGGESTION AND GRIEVANCE FORM

<b>GENEL BİLGİLER</b> <i>(Bu Kısım Yetkili Kişi Tarafından Doldurulacaktır)</i>	
Dilek, Öneri ve Şikayet Numarası:	
Dilek, Öneri ve Şikayeti Kayıt Altına Alan Kişinin Adı-Soyadı:	
Alınan Önlemler:	
Tarih ve İmza:	
<b>DİLEK, ÖNERİ VE ŞİKAYETLE İLGİLİ BİLGİLER</b> <i>(Bu kısımda paylaşmak istemediğiniz bilgileri boş bırakabilirsiniz. İsimsiz dilek öneri ve şikayetler de işleme alınacaktır)</i>	
Tarih	
İsim-Soyisim	
Şirket Çalışanıysanız Departmanınız	
Dilek, Öneri ve Şikayet Sürecinizde İletişime Geçilmesini İsteddiğiniz Yöntem	Telefon Numarası: Adres: E-mail Adresi:
<b>DİLEK, ÖNERİ VE ŞİKAYET HAKKINDA</b>	
Dilek, Öneri ve Şikayetin Konusu ve Özeti	
(Konu Şikayet ise) Olayın Gerçekleştiği Tarih	
(Konu Şikayet ise) Şikayetten Etkilenen Kişinin Bilgileri (İsteğe Bağlı)	
(Konu Şikayet ise) Şikayetin Gerçekleştiği Yer	
(Konu Şikayet ise) Şikayetin Kaç Kez Tekrarlandığı	
(Konu Şikayet ise) Şikayetin Devam Edip Etmediği	
Şikayet Devam Ediyorsa Ayrıntılar	
<b>ÇÖZÜM ÖNERİSİ</b>	
Şikayetinizin Çözümüne Kavuşması İçin Öneriniz	



## Appendix 2 – REQUEST, SUGGESSTION AND GRIEVANCE REGISTRATION FORM

Dilek, Öneri ve Şikayet Kayıt Formu

Tarih	Şikayet Numarası	Şikayeti Alan Kişi/Yetkisi	Şikayetin Konusu	Çözüm Önerileri	Tamamlanma Tarihi	İmza

## Appendix 3 – REQUEST, SUGGESSTION AND GRIEVANCE CLOSING FORM

<b>KAPANIŞ İNCELEMESİ</b>	
Proje Adı	
(Paylaşıldı ise) Şikayette Bulunan Kişinin Adı-Soyadı	
Dilek, Öneri ve Şikayet Numarası	
Dilek, Öneri ve Şikayetin Kapanış Tarihi	
Dilek, Öneri ve Şikayet Hakkında Değerlendirme	
Dilek, Öneri ve Şikayet Hakkında Alınan Tedbir	
Dilek, Öneri ve Şikayet Hakkında İşlemin Gerçekleştiği Tarih	
<b>DEĞERLENDİRME</b>	
Dilek, Öneri ve Şikayetin Takibinin Gerekliliği	Gerekli <input type="checkbox"/> Gerekli Değil <input type="checkbox"/>
(Gerekli ise) Önerilen Takip Süresi	
(Gerekli ise) Takip İşlemlerini Yürütecek Kişinin Adı Soyadı ve Unvanı	
(Gerekli ise) Takip Süresinin Tahmini Tamamlanma Süresi	
Takip Sonuçları	