



REPORT

SOMA 4 WIND POWER PLANT

STAKEHOLDER ENGAGEMENT PLAN - Final Report

Submitted to:

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1.0 INTRODUCTION

“Soma 4 Wind Power Plant (“WPP”) Project”, herein after referred to as “the Project”, aims to increase the number of turbines at the existing Soma WPP Project by adding 12 new turbines with each of 4 MW capacity. Soma Enerji Elektrik Üretim A.Ş. (“Soma Energy”) is the owner of the Project established by Polat Enerji San. ve Tic. A.Ş. (“Polat Energy”) which is the investor of the Project.

This Stakeholder Engagement Plan (“SEP”) has been produced to contribute to the studies conducted to assess the Environmental and Social Impacts of the Project as per the IFC Performance Standards (“PSs”).

This SEP was prepared by Golder Associates Müh. Müş. Proje İth. İhr. Tic. Ltd. Şti. (“Golder”) on behalf of Soma Energy for the construction and operational phases of the Project in line with the IFC PS 1 requirements and it is based on an evaluation of the stakeholder engagement program to date. The SEP identifies target groups and the specific range of engagement activities required for each group.

The SEP needs to be reviewed to ensure that it remains valid and meets the needs of Soma Energy and Polat Energy, local communities and other relevant stakeholders as identified in this SEP and to determine whether any changes or updates are required. This SEP will be reviewed frequently such as: bi-annually during the construction phase and at the transition of the construction phase to the operation phase; and annually during the operational phase. More frequent updates may be required to reflect any future changes in Project design or ESMS requirements and procedures.

Any requests for changes to this SEP should be addressed to its owner (Soma Energy) and will be subject to appropriate review and approval processes.

2.0 PROJECT DESCRIPTION

Soma Energy currently operates 169 turbines, with a total installed capacity of 240.1 MW as Soma Wind Power Plant (“WPP”) in the Soma and Kırkağaç Districts of the Province of Manisa and Altiyöl and Savaştepe Districts of the Province of Balıkesir, Turkey. Soma Energy plans to expand upon this WPP and increase its capacity by adding 12 turbines with 4 MW capacity as Soma 4 WPP Project (here in after called as “the Project”, Figure 1). The Project will increase the current capacity of the Soma WPP, which is in operation since 2009, by 48 MW.

Polat Energy established a Project Company, namely Soma Energy for the development of the Soma WPP Project in 2009. Polat Energy is the owner of the Project and aims to secure funding for Soma 4 WPP Project from Garanti Bank A.Ş. (“Garanti”), as such Golder was recruited to conduct a SEP of this capacity increase.

The Project location, including each of the 12 turbine locations to be constructed are depicted below.

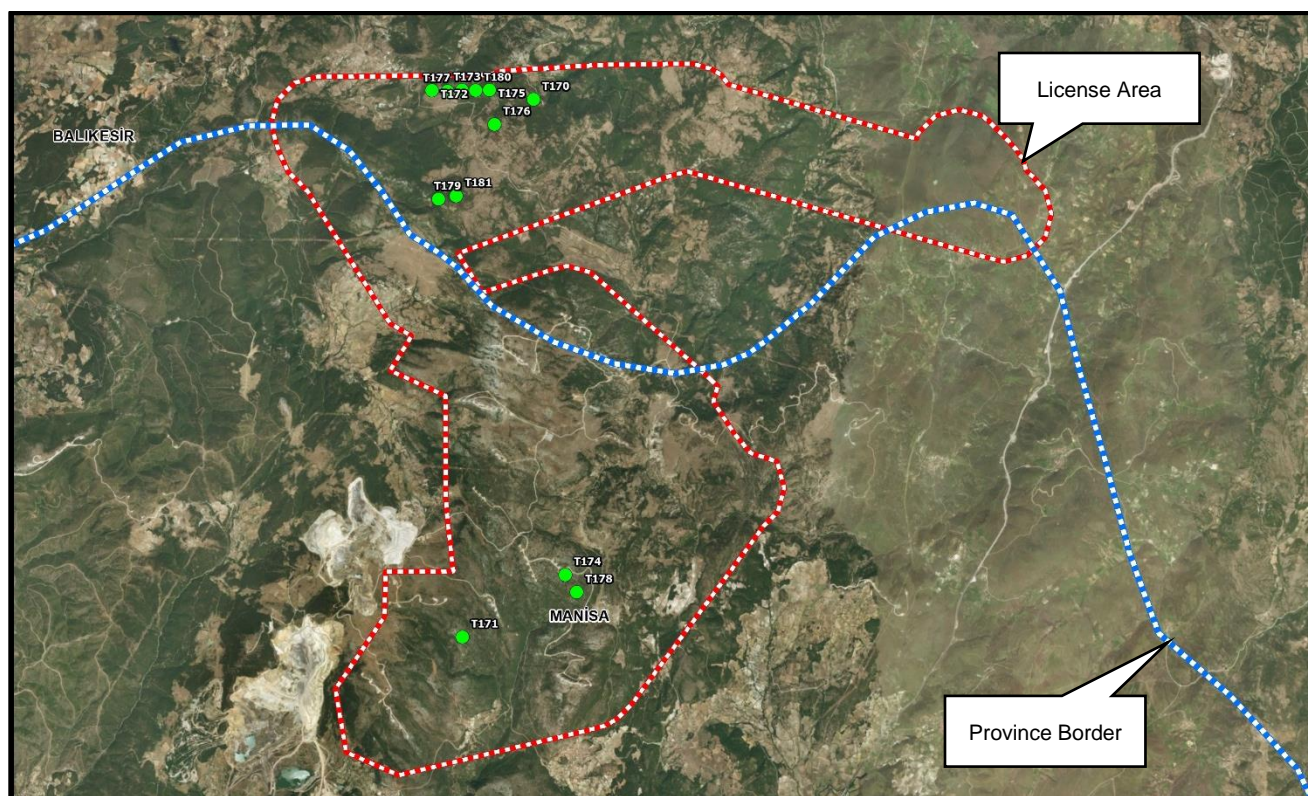


Figure 1: Soma 4 Project – Project Location

The Project site is located approximately at 15 km northeast of the Soma District centre and 10 km east of Savaştepe District centre. The nearest settlement to the proposed turbines is the Hıdırbalı Neighbourhood, which is located at 600 meters southwest of the T176. Distances of the settlements to the turbines are given in the below table and shown in Figure 2.

Table 1: The Settlements around the Project Area

Settlement	District / Province	The Nearest Turbine	Distance	Direction
Dikmeler Neighbourhood	Savaştepe / Balıkesir	T172	1.6 km	NW
Yukarıkaraçam Neighbourhood	Savaştepe / Balıkesir	T175	1.6 km	N
Hıdırbalı Neighbourhood	Savaştepe / Balıkesir	T176	0.6 km	SW
Tabanlar Neighbourhood	Soma / Manisa	T179	3.4 km	NW
Kayrakaltı Neighbourhood	Soma / Manisa	T179	2.3 km	SW
Çerkez Sultaniye Neighbourhood	Soma / Manisa	T174	3.0 km	NW

Settlement	District / Province	The Nearest Turbine	Distance	Direction
Hamidiye Neighbourhood	Kırkağaç / Manisa	T174	2.9 km	NE
Çevircek Neighbourhood	Soma / Manisa	T171	1.8 km	S

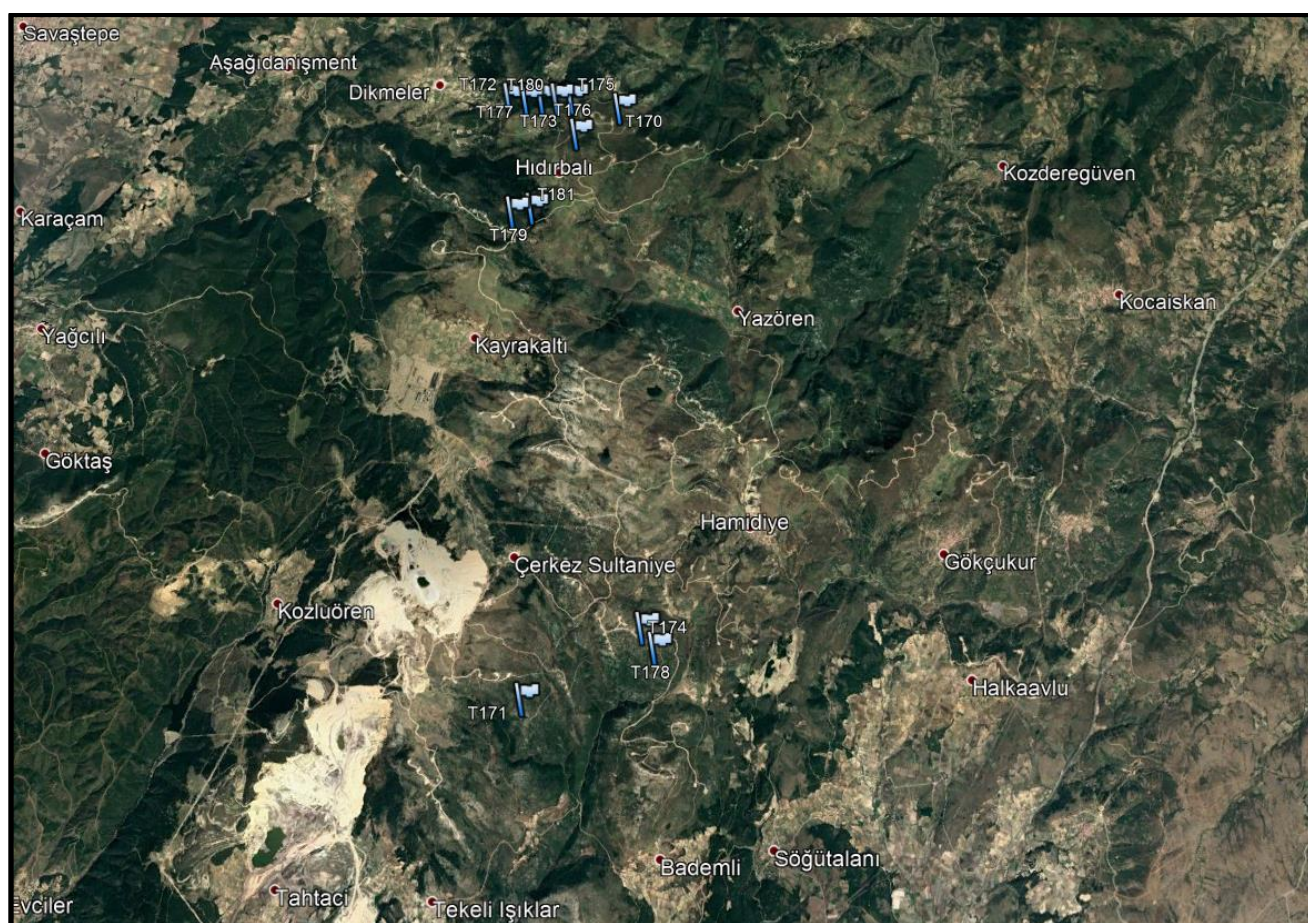


Figure 2: Soma 4 Project - Turbine locations and the Nearest Settlements

The Project construction is expected to start by May 2019 and operation date is planned as February 2020.

As a result of this Project, energy production of the Soma WPP will be increased from approximately 700,000,000 kWh/year to 860,000,000 kWh/year.¹ According to the Final EIA Report of the Soma WPP Capacity Increase Project prepared in 2016, the Project's planned economical lifetime is 49 years, after which the end of life equipment will be renewed in order to continue operation. After completion of operation, the entire facility will be dismantled, and the area will be restored to its natural state.

¹ Polat Energy Web Site, <https://polatenerji.com/santrallerimiz/soma-res>

The standard “49-year Electric Power Generation License” for the Project (License No. EÜ/1149-7/827, dated 04th April 2007) has been issued by Energy Market Regulatory Authority (“EMRA”) for the Soma Wind Power Plant Project. The Soma Wind Power Plant Project started to be operated by Soma Energy in 2009. During the timeline of the Project, an extension project has been realized. The EIA Permits obtained for the Soma Wind Power Project and the extension projects are listed below table.

Table 2: Project Environmental Permitting

Project Environmental Permitting	Issue Date
“EIA is Not Required” Decision for the 52 MW Project (Original Soma WPP) with 65 turbines in the Balıkesir Province	18 th September 2007
“EIA is Not Required” Decision for the 140.8 MW Project (Original Soma WPP) with 111 turbines in the Manisa Province	18 th September 2007
“EIA Positive” Decision for the “380 kV Soma WPP – Soma B Substation” Energy Transmission Line	12 th June 2009
“EIA is Not Required” Decision for the 140.1 MW (Original Soma WPP) with 119 turbines in the Manisa Province for the location, number and rated power changes of turbines.	01 st April 2011
“EIA is Not Required” Decision for the 22.4MW (Original Soma WPP) with 20 turbines in the Balıkesir Province for the location, number and rated power changes of turbines.	04 th May 2011
“EIA is Not Required” Decision for the 62 MWe extension project (Soma 3 WPP) with 31 turbines in the Manisa Province	20 th February 2013
“EIA is Not Required” Decision for the 38 MWe extension project (Soma 3 WPP) with 19 turbines in the Balıkesir Province	21 st February 2013
“EIA Positive” Decision for the extension project from 240.1 MWm to 672.7 MWm (Soma 4 and Soma 5 WPPs) with 103 turbines in the Manisa and Balıkesir Provinces	18 th February 2016
“EIA Positive” Decision for the extension project from 240.1 MWm to 611 MWm (Soma 4 and Soma 5 WPPs revision) with 148 turbines in the Manisa and Balıkesir Provinces	27 th December 2016
Official Letter from the MoEU confirming that EIA Decision is valid for the location changes of 7 turbines and technical changes of 12 turbines	14 th February 2018
Official Letter from the MoEU confirming that EIA Decision is valid for the location changes of 4 turbines	14 th September 2018

3.0 PURPOSE

The objective of this document is to identify all stakeholders and their interests to the Project, and to lay out the procedures and principles to be applied during engagement with the stakeholders.

The purpose of this Plan is:

- identifying all stakeholders and their interests to the Project;
- defining the scope of stakeholder engagement and setting out applicable management interfaces;
- defining roles and responsibilities;
- outlining the applicable Project Standards relevant to this Plan;
- defining Project commitments, and procedures relevant to this Plan; and
- defining training requirements.

This Plan aims:

- To define the stakeholders;
- To describe the most effective methods by:
 - keeping the management of operation fully informed on the issues related to external affairs and concerns;
 - establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns; and
 - understanding the concerns of stakeholders and establishing fair, transparent and clear dialogue with them based on their concerns.
- To establish long term relations between Soma Energy/Polat Energy and local communities based on mutual trust and transparency;
- To ensure that stakeholders have access to information on the Project, investments, construction works and operation activities in a timely manner and that disclosed information and data are fully understandable for the targeted groups, and that access to consultation locations is available for all;
- To ensure that vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement processes; and
- To ensure that all relevant parties have been engaged and no group has been excluded.

4.0 SCOPE

This Plan is applicable to all activities resulting from the Project, including those of associated facilities and all Contractors during both the construction and operational phases of the Project. All contractors shall work in compliance with the related requirements and standards that have been set out in this Plan, after getting approval by Soma Energy/Polat Energy.

5.0 PROJECT STANDARDS

All activities and implementations within the scope of the Project shall comply with relevant standards. These are as follows:

- Applicable Turkish Legislation;
- Commitments made to and requirements of, in accordance with relevant laws and regulations, relevant subsidiaries and institutions of the Ministries of the Turkish Republic;
- IFC Performance Standards; and
- All policies, standards, directives, plans, lists and standard operation procedures of Polat Energy and its corporate management systems.

5.1 Applicable Turkish Standards

I. THE CONSTITUTION OF THE REPUBLIC OF TURKEY

“The Constitution of the Republic of Turkey” 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:

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 his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in 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.

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.

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 shall take supportive and promotive measures towards that end.

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 to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

II. 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.

III. 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 organizations, which qualify as public institutions.

IV. 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 with regard to 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.

V. EXPROPRIATION LAW

Another law related to the involvement of stakeholders to the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

VI. ENVIRONMENTAL LAW

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to Environmental Law, citizens as well as the State bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (25.11.2014, OG No. 29186 amended 09.02.2016, 26.05.2017).

The Projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003, 2008 and finally the last EIA Regulation came into force on November 25th, 2014 and its latest amendment occurred on 26.05.2017.

In accordance with Turkish Republic Ministry of Environment and Urbanization Environmental Impact Assessment (“EIA”) Regulation (Official Gazette Nov. 25, 2014; No: 29186), relevant requirements in relation with EIA Process have been disclosed to the public.

The latest "EIA Positive Decision" for the Soma WPP Capacity Increase (240.1 MW to 611 MW) Project was obtained on 27.12.2016.

5.2 Applicable International Standards and Guidelines

International standards to be observed by the Project are the IFC Performance Standards. In particular, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement.

Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties having an effect on, having been affected by, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them;
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it;
- To review this database in consultation with relevant parties;
- To provide necessary information and consultancy services to all stakeholders in order to facilitate their required contributions on the environmental and social issues that may affect them; and
- To continuously protect respectful and constructive relations with stakeholders on the basis of mutual confidence and honesty, and by respecting the values of the stakeholders.

Basic requirements of international standards and guidelines are as follows:

- Description of stakeholders,
- Preparation of a Stakeholder Engagement Plan,
- Provision of necessary information about the Project and operation to the communities that have been affected or potentially to be affected,
- Provision of significant consultancy services by means of early and continuous engagement,
- The grievance and feedback mechanism aiming at concerns, complaints, requests and demands of the stakeholders, in relation with the Project, is planned to be implemented in a timely manner.

The Soma 4 WPP Project is a **Category B** project. According to the IFC; Category B Project defined as: Business activities with potential limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures.

IFC Performance Standards

The key requirements related to stakeholder engagement from IFC PS1² are summarized below:

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

² (International Finance Corporation, 2012)

- When potentially significant adverse impacts on Affected Communities exist, an Informed Consultation and Participation (ICP) is to be conducted.
- Indigenous peoples are also to be engaged via the ICP process.

Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007)

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

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

6.0 ROLES AND RESPONSIBILITIES

Table 3: Roles and Responsibilities

Roles	Description and Responsibilities
General Manager	<p>The responsibilities of the General Manager are as follows:</p> <ul style="list-style-type: none"> ■ Approval of this Plan and resources required for its implementation; ■ Responsible for preventing the environmental impacts and HS hazards in accordance with the actions of Polat Energy/Soma Energy; mitigating and eliminating potential social grievances; and providing anything that is necessary and applicable to increase resource efficiency; ■ Determining policies and targets; ■ Ensuring that there are provisions in the contractor engagements about environment, social and HS requirements in order to ensure that the contractor works in accordance with the national legislation and relevant international standards (IFC, etc.) during the construction stage of energy investments and while auditing the performance of the contractors; ■ Appointing the Management Representative and ensuring the Management Representative is aware of his/her roles and responsibilities; ■ Increasing the skill and motivation of the personnel; managing the labour force; enhancing working conditions; providing resources for personnel training; and ensuring that performance assessments are being conducted; and

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> Evaluate the reports provided by Management Representative and ensure necessary actions were taken.
Management Representative	<p>The responsibilities of the Management Representative are as follows:</p> <ul style="list-style-type: none"> To ensure that the quality, environment, HS and resource efficiency documents are prepared and implemented in an effective manner; Make periodic inspections of the performance of contractors of its operations during the construction phase; Review the Grievance Database (which includes open and/closed complaints details) every month; Report to the General Manager about system performance; To ensure national and international legislations/guidelines which are applicable to the Project activities are identified and tracked; and Work in cooperation with other departments in order to determine targets for Environmental, Social, HS, and resource efficiency issues.
Operation Manager/Project Manager	<p>Operation/Project Manager is responsible for:</p> <ul style="list-style-type: none"> Determination of project info kit and social budget of the project together with Management Representative; Monitoring the correct and effective implementation of this SEP; Inspecting the effectiveness of the environmental, social and HS documents and applications, and the efficiency and effectiveness of the personnel that are appointed for these issues; Increasing the skill and motivation of the personnel; managing the labour force; enhancing working conditions; providing resources for personnel training; and ensuring that performance assessments are being conducted; Reports to the Management Representative and/or General Manager about system performance; Monitoring and helping (when needed) that Social Responsibility Staff and HSE Manager is managing the process in the prescribed manner; and Making the final decision concerning internal/external grievances (if needed) in the light of the assessments of Social Responsibility Staff and HSE Manager.
Social Responsibility Staff ("SRS")	<p>Project Social Responsibility Staff is responsible for:</p> <ul style="list-style-type: none"> Keeping the record of the complaints/suggestions in the Grievance Database with details (raised by who, date, status (open, awaiting or closed) etc.); Supporting HSE Manager on the first evaluation of the relevance of grievances collected,

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> ■ Show best efforts to resolve all complaints in one month; ■ Provide regular reporting back to the community on the management related to community grievances (including the type of grievance, how they have been addressed and the resulting outcomes); ■ Record all formal and informal engagement activities with local communities in Stakeholder Management System. This will include interactions with committees and working groups. These interactions will be summarized in the stakeholder engagement quarterly reports; ■ Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports; ■ Monitor and record the social responsibility activities carried out in the scope of Soma 4 WPP Project and these records will be inserted to stakeholder engagement quarterly reports; ■ Organize stakeholder meetings to collect the responses to grievances actively as required; ■ Give feedback to the stakeholders about the result of their grievances through External Grievance Form within 30 calendar days (Complainants, who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed).
Health Safety and Environment Manager ("HSE")	<p>The responsibilities of the HSE Manager are as follows:</p> <ul style="list-style-type: none"> ■ Determines the national and international legislations that are applicable to the Project activities and informs the Operation/Project Manager; ■ Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures, and measures to eliminate any potential social grievances; ■ Ensures that all provisions in the contractor engagements regarding environment, social and HS requirements, as per the Project Standards, during the construction stage, and to audit the performance of said contractors; ■ Determines and provides the necessary training materials for employees; and ■ Provides answers to the OHS, environmental and social (especially labour related) grievances raised by employees, the local community and local institutions; ■ Helps SRS for keeping the record of the complaints/suggestions in the Grievance Database with details (raised by who, date, status (open, awaiting or closed) etc.); ■ Supporting SRS on the first evaluation of the relevance of grievances collected; and

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> ■ Supporting SRS for recording all formal and informal engagement activities. ■ Monitors relevant legislations; ■ Conducts internal audits / site audits; ■ Determines corrective measures if necessary; ■ Identifies the need for OHS and Environmental trainings; ■ Checks the OHS records and performance reviews of contractors; ■ Checks the Environmental records and performance reviews of contractors; ■ Examines the HSE response plans and preparations; ■ Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained; ■ Implements this plan; and ■ Forms relationships with the Project stakeholders.
Contractors/Subcontractor	<ul style="list-style-type: none"> ■ Contractors/Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence; and ■ They will follow the rules listed in this SEP and other relevant Management System documentation of Soma Energy/Polat Energy.

7.0 STAKEHOLDER ENGAGEMENT

7.1 Early Engagement

The e-mail address and telephone number are presented in the websites of Polat Energy and Soma Energy (<https://polatenerji.com/> and <http://www.somaenerji.com.tr>)

The communication form is presented in the website of Polat Energy. External grievance forms will be distributed in public places as well, presented as Appendix C.

Two formal stakeholder engagement meetings (public hearing meetings), a requirement of the local EIA Regulation, were held during the local EIA process in Manisa and Balıkesir. First meeting was conducted in 27.06.2016 in Hamidiye Neighbourhood, Kırkağaç, Manisa. The second meeting was conducted on 28.06.2016 at Hıdırbalı Neighbourhood, Savaştepe, Balıkesir. The meetings were announced in the national and local newspapers per the regulatory requirements and additionally the announcement letters were sent to the mukhtars of the nearby settlements and presented in the mukhtars' offices. The meetings comprised of presentation includes the Project information and record of comments and suggestions.

Below social responsibility projects held on by Soma Energy in the scope of existing Soma WPP Project between the year of 2011-2012.

- Planting trees in the Project area

- School Renovations
 - Hamidiye Elementary School
 - Çerkez Sultaniye Village School
 - Gelenbe Şair Eşref Elementary School
- Renovations of the cemeteries of Çerkez Sultaniye and Hıdırbalı Neighbourhood
- Expansion and repair process of Hamidiye Neighbourhood road (this social responsibility projects will continue in the scope of Soma 4 WPP Project)

8.0 STAKEHOLDER IDENTIFICATION

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

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context.

The relevant stakeholder groups are:

1) External Stakeholders

- Communities
 - Local Communities–Affected settlements,
 - Regional Communities and National Communities;
- Governmental Authorities
 - National governmental bodies
 - Local/ regional governmental bodies,
 - Municipalities and Mukhtar offices
 - Security and emergency forces
- Non-Governmental Organizations – Regional, national and international bodies;
 - Universities and Independent Experts; and
 - Media
 - Construction Contractors
 - Other Interested Parties.

2) Internal Stakeholders

- Employees

A detailed list of stakeholders is provided in Appendix A.

9.0 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an ongoing activity throughout planning, construction, operations and closure phases of the Project.

Soma Energy has the overarching goal of developing sustainable relations with stakeholders through the lifetime of the Project and therefore will continue to engage stakeholders through various activities as detailed in the following Stakeholder Engagement Program.

The SEP and the Stakeholder Engagement Program will be reviewed every six months during construction phase and annually during the operation phase, to ensure that they remain valid and meet the needs of Polat Energy/Soma Energy, the affected communities and other relevant stakeholders and its compliant with international standards.

The detailed stakeholder engagement program is provided in Appendix B.

10.0 TOOLS & METHODS FOR INFORMATION DISCLOSURE DURING CONSTRUCTION AND OPERATION OF THE PROJECT

Soma Energy will provide transparent informative material in a consistent and timely manner to the affected communities and the remaining stakeholders. The manner in which this material will be disclosed is discussed in the sections that follow.

10.1 Internal/Web Site

Polat Energy/Soma Energy will keep information on the Project updated on their website in both Turkish and English. The homepages of the website can be found here:

- <https://polatenerji.com/>
- <http://www.somaenerji.com.tr>

10.2 Information Sheets

Information sheets including a non-technical summary of the Project, key project issues and details regarding Polat Energy's and Soma Energy's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the Polat Energy and Soma Energy websites and at the Soma 4 WPP Project construction site offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

10.3 Responding to Local Communities and Publications for People

Authorities of the Project will give full and timely responses to requests, comments and questions of local communities in addition to implementing the grievance procedure in the case of complaints. All requests shall be treated respectfully. In the event it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

At the Polat Energy/Soma Energy website, material providing information about different stages of the project will be available, and stakeholders will be kept posted.

When needed, particular matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities on the basis of impact assessment surveys carried out by company. As long it is appropriate, relevant Project information will be disclosed to the public.

10.4 Disclosure Activities

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

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

Project related information communication meetings will be open to the entire public and will be announced through local media. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women for women only meetings.

Polat Energy/Soma Energy will inform the public, via newspapers, meetings, media and other similar means, about how people can access Project related documents (such as this SEP and NTS) and the project timetable, and how they can submit comments regarding said documents. Contact details for the Polat Energy/Soma Energy are presented in Section 11.2.

11.0 MANAGEMENT OF GRIEVANCES

11.1 Grievance and Feedback Procedure

As discussed previously; grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People ("PAP").

Grievance procedures provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible and transparent manner.

Grievance procedures will be coordinated through the appointed Social Responsibility Staff with the help of HSE Manager who are the primary interfaces between the community and Soma Energy. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate.

SRS is recommended to be nominated from either Investments and Operation, Corporate Communications or Human Resources department. The SRS is expected to conduct a bridge between the firm and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the company SRS or HSE Manager if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of Soma Energy.

11.1.1 Principles of the Grievance Mechanism (Internal and External Grievance Mechanism)

The grievance mechanism is developed to cover the following:

- Simplicity and necessity: Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- Keeping it up to date: The process will be regularly reviewed jointly by the SRS and the HSE Manager. Regular monitoring and evaluation should be conducted continuously.
- Confidential and impartial process, non-retribution: The process will be confidential and impartial, without employees fearing retribution.
- Reasonable timescale: A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- Keeping of records: Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

11.1.2 Collection, Registration and Evaluation of Grievances

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

- Initiate the grievance procedure, mainly by the SRS with the help of HSE Manager;
- SRS registers the grievance/comment in the grievance database (see Appendix E);
- The SRS investigates the grievance and makes the first evaluation with the help of HSE Manager;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 days after the grievance is received);
- The grievance is officially closed after related documentation is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

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

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

11.1.3 Feedback to the Stakeholders

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

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is important in maintaining a ‘social licence to operate’.

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

11.1.4 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor’s employees) during the recruitment process and the first EHS training sessions will also include the stakeholder engagement and grievance mechanism process trainings;
- Communication about the grievance mechanism will be repeated regularly with the tool-box trainings;
- The grievance/suggestion boxes will be made available at the Soma 4 WPP Project construction site offices for internal grievances; and
- All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

For the collection of internal grievances from community:

- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion);
- The grievance/suggestion boxes will be made available at the Mukhtars offices or villagers’ gathering points (such as tea houses etc.) in the nearest settlements; and
- Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

The grievance mechanism constitutes two parts: External (for the benefit of external stakeholders, which will be identified in the stakeholders list in Appendix B) and internal (Workers, subcontractors and suppliers of Soma Energy). These two mechanisms will have different respondents: External Grievance Mechanism will be run by the SRS and the HSE Manager, while internal GM will be under the responsibility of different departments collaborating, such as HR, Finance, Corporate Communications and alike. A sample of the internal grievance form is presented in Appendix D.

11.2 Contact Details of Polat Energy/Soma Energy

Contact Detail
<p>Polat Enerji San. ve Tic. A.Ş.: Kağıthane Polat Ofis – Gürsel Mah. İmrahor Cad. No: 27 Kat:3 B07-B08 - 34400 Kağıthane İstanbul</p> <p>Telephone: +90 (212) 213 66 35 Fax: +90 (212) 213 66 39 E-Mail: info@polatenerji.com</p> <p>Soma Enerji Elektrik Üretim A.Ş.: Kağıthane Polat Ofis Gürsel Mah. İmrahor Cad. Yankı Sk. No: 27 Kat:3 B07-B08 34400 Kağıthane - İstanbul</p> <p>Telephone: +90 (212) 213 66 35 Fax: +90 (212)213 66 39</p>

12.0 MONITORING

12.1 Key Monitoring Activities

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

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

Polat Energy/ Soma Energy will monitor the effectiveness of the engagement processes by analysing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

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

- Transparency and accessibility of the engagement process,
- Provision of relevant information,

- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and
- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries. Key monitoring measures are shown in Table 4.

Table 4: Key Monitoring Measures

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
SEP-01a	Community Grievances	Social Responsibility Staff and HSE Manager will keep the record of the complaints/suggestions in the Grievance Database with details (raised by who, the date, status (open or closed) etc.).	Social Responsibility Staff HSE Manager	Continuously
SEP-01b	Community Grievances	Management Representative will review the Grievance Database (which includes open and/closed complaints details) every month.	Management Representative	Every month
SEP-02a	Feedback to local communities	The Social Responsibility Staff, and as necessary the HSE Manager work together to provide regular reporting back to the community on the management related to community grievances (including the type of grievance, how they have been addressed and the resulting outcomes).	Social Responsibility Staff HSE Manager	Continuously
SEP-02b	Feedback to local communities	Polat Energy / Soma Energy will ensure that an audit will be conducted related to grievance process in every 6 months by Operation Manager or Management representative or designated other responsible (like internal auditors in the company or external third-party companies).	Polat Energy /Soma Energy	Every 6 months

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
SEP-03a	Community engagement activities	Social Responsibility Staff with the help of HSE Manager will record all formal and informal engagement activities with local communities in Stakeholder Management System. This will include interactions with committees and working groups. These interactions will be summarized in the stakeholder engagement quarterly reports.	Social Responsibility Staff HSE Manager	Reporting-quarterly (construction), bi-annually (operation)
SEP-03b	Community engagement activities	Polat Energy / Soma Energy will ensure that an audit will be conducted related to stakeholder Engagement process in every 6 months (bi-annually) by Operation Manager or Management representative or designated other responsible (like internal auditors in the company or external third-party companies).	Polat Energy /Soma Energy	Bi-annually
SEP-04	Disclosure materials disseminated	Social Responsibility Staff with the help of HSE Manager will keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports.	Social Responsibility Staff	Reporting-quarterly (construction), bi-annually (operation)
SEP-05	Social Responsibility Program	Social Responsibility Staff will monitor and record the social responsibility activities carried out in the scope of Soma 4 WPP Project and these records will be inserted to stakeholder engagement quarterly reports.	Social Responsibility Staff	Reporting-quarterly (construction, bi-annually (operation)

12.2 Key Performance Indicators

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

Table 5: Key Performance Indicators

ID	KPI	Target	Monitoring Measures
SEP-KPI-01	Number of community complaints or grievances	Total number reduced year on year	Grievance Database

ID	KPI	Target	Monitoring Measures
SEP-KPI-02	Number of complaints closed within one month	Target of 100%	Grievance Database
SEP-KPI-03	Reporting back to stakeholders on the implementation of the Grievance Mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
SEP-KPI-04	Auditing the Grievance Mechanism to ensure that it is being implemented and that grievances are being adequately addressed.	Bi-annual (construction), annual (operation) audit complete Target of 100% of grievances closed out to satisfaction of complainant within one month	Audit Report

13.0 TRAINING

All necessary training will be provided as part of induction training for all employees of the Project and its contractors (to provide general awareness) and specific training on stakeholder engagement and the application of the Grievance Mechanism will be provided to Social Responsibility Staff and other personnel and supervisors of Polat Energy/Soma Energy and contractors involved in or overseeing activities with local communities.

14.0 AUDIT AND REPORTING

Internally, conformance of this SEP will be monitored in accordance with the requirements of the Soma Energy/Polat Energy.

Contractors will be subject to inspection and audit in accordance with the requirements of the Soma Energy/Polat Energy.

Conformance with this plan will be subject to periodic assessment by Soma Energy/Polat Energy corporate audit and assurance programs and separately by Project Lenders.

14.1 Record Keeping

Records will be kept on the following subjects:

- 1) Consultation meetings.
- 2) Stakeholder engagement activities.
- 3) Grievances raised and actions taken to close them
- 4) Opinions/suggestions/comments provided by the community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism).
- 5) Press releases and interviews.
- 6) Records of audits, inspections and incidents.

Signature Page

Golder Associates (Turkey) Ltd. ŞTI

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Project Manager

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HSE Specialist

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APPENDIX A

DETAILED STAKEHOLDER LIST

Table 6: Detailed Stakeholder List

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Hamidiye Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Hıdırbalı Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Aşağıdanişment Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Dikmeler Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Kayrakaltı Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Çerkez Sultaniye Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Kozluören Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Yazören Neighbourhood		√	Local Communities	Local residents Main socioeconomic activity: Unknown

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Savaştepe District		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Soma District		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Kırkağaç District		√	Local Communities	Local residents Main socioeconomic activity: Unknown
Manisa Province		√	Regional Communities	Regional residents
Balıkesir Province		√	Regional Communities	Regional residents
Employees of the Project	√		Employees	Employees of Polat Enerji, Soma Enerji and employees of contractors of the Project.
General Directorate of TEİAŞ (Turkish Electricity Transmission Corporation)		√	National governmental bodies	Policy maker: Installation, renewal, extension and repair of energy transmission lines and facilities, troubleshooting of line and transformer faults, operation of associated transformer centre.
Republic of Turkey Energy Market Regulatory Authority		√	National governmental bodies	Regulates the electricity market to an extent

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Manisa Provincial Gendarmerie Command		√	Local/ regional governmental bodies	Security
Balıkesir Provincial Gendarmerie Command		√	Local/ regional governmental bodies	Security
Governorship of Manisa		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Governorship of Balıkesir		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Soma District Governor		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Savaştepe District Governor		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Kırkağaç District Governor		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Manisa Municipality		√	Municipalities and Mukhtar offices	Permitting Development plans; public services, public aids (providing work machine, waste disposal, public education services, etc.) Construction, repair and extension of transportation routes; environmental planning; interventions against landslide and land changes; social services and assistance; zoning works, water, sewage, solid waste, environment and emergency aid; and issues related to forest villages.
Balıkesir Municipality		√	Municipalities and Mukhtar offices	Permitting Development plans; public services, public aids (providing work machine, waste disposal, public education services, etc.) Construction, repair and extension of transportation routes; environmental planning; interventions against landslide and land changes; social services and assistance; zoning works, water, sewage, solid waste, environment and emergency aid; and issues related to forest villages.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Savaştepe Municipality		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Soma Municipality		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Kırkağaç Municipality		√	Local/ regional governmental bodies	Permitting Administrative works, environmental plans and programs for public services (education, skill, etc.)
Manisa Directorate of Forestry Operation		√	Local/ regional governmental bodies	Permitting Right of use of land, forestry permits, grievances related to forestry, forestry auditing.
Balıkesir Regional Directorate of Forestry		√	Local/ regional governmental bodies	Permitting Right of use of land, forestry permits, grievances related to forestry, forestry auditing.
Manisa Provincial Directorate of Environment and Urbanization		√	Local/ regional governmental bodies	Permitting Development plan related issues, grievances related to environment, environmental auditing. Consultations on natural assets within the area.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Balıkesir Provincial Directorate of Environment and Urbanization		√	Local/ regional governmental bodies	Permitting Development plan related issues, grievances related to environment, environmental auditing. Consultations on natural assets within the area.
Manisa Provincial Directorate of Agriculture and Forest		√	Local/ regional governmental bodies	Permitting Decisions and permits related to agricultural areas; conservation and development of animal stockbreeding and range.
Balıkesir Provincial Directorate of Agriculture and Forest		√	Local/ regional governmental bodies	Permitting Decisions and permits related to agricultural areas; conservation and development of animal stockbreeding and range.
Manisa Provincial Directorate of Health		√	Local/ regional governmental bodies	Prevention of the spread of communicable diseases; vector struggle; measures for the protection of public health.
Balıkesir Provincial Directorate of Health		√	Local/ regional governmental bodies	Prevention of the spread of communicable diseases; vector struggle; measures for the protection of public health.
Manisa Provincial Directorate of Social Security		√	Local/ regional governmental bodies	Permitting Social security and insurance of workers, employment and dismissal notices.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Balıkesir Provincial Directorate of Social Security		√	Local/ regional governmental bodies	Permitting Social security and insurance of workers, employment and dismissal notices.
Manisa Provincial Directorate of Culture and Tourism		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Balıkesir Provincial Directorate of Culture and Tourism		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
İzmir 2 Board of Directorates for the Preservation of Cultural Assets No. 2		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Balıkesir Board of Directorates for the Preservation of Cultural Assets		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Manisa Museum Directorate		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Balıkesir Kuva-yi Milliye Museum Directorate		√	Local/ regional governmental bodies	Permitting Consultations on possible cultural assets that may be encountered within the Project area
Manisa Provincial General Congress		√	Local/ regional governmental bodies	Generates local legislation.
Balıkesir Provincial General Congress		√	Local/ regional governmental bodies	Generates local legislation.
State Hydraulic Works (“DSİ”) 2 nd Regional Directorate		√	Local/ regional governmental bodies	Head of the 2 th DSİ Branch
State Hydraulic Works (“DSİ”) 25 th Regional Directorate		√	Local/ regional governmental bodies	Head of the 25 th DSİ Branch
Ministry of Environment and Urbanization		√	National governmental bodies	Policy maker: Development plan related issues, grievances related to environment, environmental auditing.
Ministry of Agriculture and Forestry		√	National governmental bodies	Policy maker: Right of use of land, forestry permits, and grievances related to forestry and water sources, forestry and water source auditing.
Ministry of Energy and Natural Resources		√	National governmental bodies	Policy maker: Natural resources

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Ministry of Industry and Technology		√	National governmental bodies	Policy maker: Regulate science, industry and technology.
Ministry of Treasure and Finance		√	National governmental bodies	Policy maker
Ministry of Trade		√	National governmental bodies	Policy maker
Ministry of Health		√	National governmental bodies	Policy maker: Prevention of the spread of communicable diseases; vector struggle; measures for the protection of public health.
Ministry of Family, Labour and Social Affairs		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.
General Directorate of Occupational Health and Safety		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.
Turkish Employment Agency General Directorate		√	National governmental bodies	Policy maker: Audits of occupational health and safety, information about vacant employment positions.

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Contractors		√	Contractors	Implementation of Project ESMS
World Wildlife Fund-Turkey		√	NGO	NGO
Greenpeace		√	NGO	NGO
UNESCO		√	NGO	NGO
TEMA Manisa Branch		√	NGO	NGO
DOĞÇEV Association		√	NGO	NGO
Doğa Association		√	NGO	NGO
Bird Life International		√	NGO	NGO
Nature Conservation Centre ("DKM")		√	NGO	NGO
Sustainable Rural and Urban Development Association ("SÜRKAL")		√	NGO	NGO
ÇEKÜL Association		√	NGO	NGO
Manisa Celal Bayar University		√	NGO	NGO
Balıkesir University		√	NGO	NGO

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Union of Chambers of Turkish Engineers and Architects		√	NGO	NGO
Chamber of Environmental Engineers		√	NGO	NGO
Manisa Chamber of Commerce and Industry		√	NGO	NGO
Manisa Association of Industrialists and Businessmen		√	NGO	NGO
Soma Gündem Newspaper		√	Media	Information Disclosure
Soma Yeni Haber Newspaper		√	Media	Information Disclosure
Soma Olay Newspaper		√	Media	Information Disclosure
Soma Karaelmas Newspaper		√	Media	Information Disclosure
Manisa'da Denge Newspaper		√	Media	Information Disclosure
Manisa Olay Newspaper		√	Media	Information Disclosure
Manisa Manşet Newspaper		√	Media	Information Disclosure
Manisa'da Gündem Newspaper		√	Media	Information Disclosure

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Hür Işık Newspaper		√	Media	Information Disclosure
Manisa Haber Newspaper		√	Media	Information Disclosure
Manisa Günebakış Newspaper		√	Media	Information Disclosure
Balıkesir Posta Newspaper		√	Media	Information Disclosure
Balıkesir Yeni Haber Newspaper		√	Media	Information Disclosure
Balıkesir Demokrat Newspaper		√	Media	Information Disclosure
Balıkesir Politika Newspaper		√	Media	Information Disclosure
Balıkesir Ekspres Newspaper		√	Media	Information Disclosure
Balıkesir Yenisöz Newspaper		√	Media	Information Disclosure
Balıkesir Merhaba Newspaper		√	Media	Information Disclosure
Balıkesir Yenigün Newspaper		√	Media	Information Disclosure
Balıkesir Birlik Newspaper		√	Media	Information Disclosure
Manisa ETV		√	Media	Information Disclosure

STAKEHOLDERS	STAKEHOLDER TYPE		GROUP	ACTIVITY AREA
	Internal Stakeholder	External Stakeholder		
Manisa Medya TV		√	Media	Information Disclosure
Soma TV		√	Media	Information Disclosure
TV 100		√	Media	Information Disclosure
Balıkesir Kent TV		√	Media	Information Disclosure

APPENDIX B

**STAKEHOLDER ENGAGEMENT
PROGRAM**

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities	Project information on design, schedule, environmental and social impacts of the project construction, commissioning and operation.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Information sharing; ■ Objective and structure of investment and ongoing construction activities; ■ Production and environmental technology selected, and operational precautions taken; ■ Early notification on Construction end date. ■ Information provision on traffic routes and schedules ■ Training on traffic safety 	<ol style="list-style-type: none"> 1. NTS 2. Annual reports 3. Contact group/ Community meetings 4. Media 5. Traffic Management Plan/Contact group/ Community meetings 6. Training 	<ol style="list-style-type: none"> 1. Prior to Construction, reviewed for updates every 2 years 2. Annual/As required 3. As required 4. As required 5. As required 6. As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> Scheduling for commissioning activities and potential impacts on health and safety measures/mechanisms; and Mitigation measures (if any) against environmental and social impacts. 	<ol style="list-style-type: none"> NTS Annual reports Contact group/ Community meetings Media 	<ol style="list-style-type: none"> Prior to the operation phase, reviewed for updates every 2 years Annual/As required As required As required 	Soma Energy/Polat Energy
Communities	Project information on land use impacts	Construction	Provision of information on: <ul style="list-style-type: none"> Discuss restrictions to forest areas that may be required for the construction activities to ensure that livelihoods are not adversely impacted. 	<ol style="list-style-type: none"> NTS Annual reports Contact group/ Community meetings Media 	<ol style="list-style-type: none"> Prior to Construction, reviewed for updates every three years Annual/As required As required As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> Discuss restrictions forest areas that may be required for the operation activities to ensure that livelihoods are not adversely impacted; and Update land users on Project activities, and the governmental permitting process which includes the forest area usage permission. 	<ol style="list-style-type: none"> 1. NTS 2. Annual reports 3. Contact group/ Community meetings 4. Media 	<ol style="list-style-type: none"> 1. Prior to the operation phase, reviewed for updates every three years 2. Annual/As required 3. As required 4. As required 	Soma Energy/Polat Energy
Communities	Recruitment and Procurement Strategies of the Project	Construction	Provision of information on: <ul style="list-style-type: none"> Recruitment of employees; and Procurement of supplies and services. 	<ol style="list-style-type: none"> 1. Information leaflets (on policies and strategies) 2. During Stakeholder Engagement Meetings 3. Meetings with local Mukhtar 4. Media 	<ol style="list-style-type: none"> 1. As required 2. Prior to the construction phase, as required 3. As required 4. As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; and ■ Procurement of supplies and services. 	<ol style="list-style-type: none"> 1. Information leaflets (on policies and strategies) 2. During Stakeholder Engagement Meetings 3. Meetings with local Mukhtars 4. Media 	<ol style="list-style-type: none"> 1. As required 2. Prior to the operation phase, as required 3. As required 4. As required 	Soma Energy/Polat Energy
Communities	Procedures on how to submit comments to and raise grievances regarding the Project Procedures of the Project on responding to community comments and grievances	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Grievance Mechanism Procedure; ■ Grievance Resolution Process (including in response to contractor issues); ■ Periodic monitoring of contract implementation with communities; and ■ Monitoring of the determined resolution measures. 	<ol style="list-style-type: none"> 1. Review of grievance register 2. Meetings with local Mukhtars 3. Community meetings 	<ol style="list-style-type: none"> 1. Every month 2. and 3. As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> Grievance Mechanism Procedure; Grievance Resolution Process (including in response to contractor issues); Periodic monitoring of contract implementation with communities; and Monitoring of the determined resolution measures. 	<ol style="list-style-type: none"> Review of grievance register Meetings with local Mukhtars Community meetings 	<ol style="list-style-type: none"> Every month 2,3. As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities Local/ Regional governmental bodies and NGOs	The design and implementation of Social Responsibility Project(s)	Construction	Provision of information on Social Responsibility Project(s) for the: <ul style="list-style-type: none"> ■ Identification and prioritization of community needs; ■ Assessment of available and required resources; ■ Formation of partnerships with government and community groups for development and implementation of Social Responsibility Project(s) in partnership with key stakeholders; and ■ Promotion of positive interactions between the Project workforce and public services (e.g. sport, recreation, worship, or other activities). 	1. Workshops 2. Surveys 3. Community Meetings 4. Meetings with NGOs 5. Media	1,2,4, and 5. As required 3 As required	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on Social Responsibility Project(s) for the: <ul style="list-style-type: none"> ■ Identification and prioritization of community needs; ■ Assessment of available and required resources; ■ Formation of partnerships with government and community groups for development and implementation of Social Responsibility Project(s) in partnership with key stakeholders; and ■ Promotion of positive interactions between the Project workforce and public services (e.g. sport, recreation, worship, or other activities). 	1. Workshops 2. Surveys 3. Community Meetings 4. Meetings with NGOs 5. Media	1,2, 4 and 5. As required 3. As required	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities & NGOs, Local/ regional governmental bodies (specifically, heads of emergency services)	Use of Emergency Response and Preparedness in the Project	Construction	Provision of information on code compliance / emergency preparedness to: <ul style="list-style-type: none"> Engage in public consultation and disclosure about issues of concern with potentially affected stakeholders. 	1. Drills 2. Workshops 3. Community Meetings	1. Annual drills or as required. 2. As required 3. As required	Soma Energy/Polat Energy
		Operation	Provision of information on code compliance / emergency preparedness to: <ul style="list-style-type: none"> Develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	1. Drills 2. Workshops 3. Community Meetings	1. Annual drills or as required. 2-3. As required	Soma Energy/Polat Energy
Communities Hıdırbalı	Potential Cumulative	Construction	Not applicable as existing Soma WPP is already in operation.	N/A	N/A	-

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Neighbourhood, Dikmeler Neighbourhood and Yukarıkaraçam Neighbourhood	Impacts of the existing Soma WPP and Soma 4 WPP	Operation	Provision of information on: <ul style="list-style-type: none"> Noise Management Plan and Monitoring results Traffic Management Plan Biodiversity Action Plan Community Health and Safety Plan 	1. Community Meetings 2. Meetings with the relative Mukhtars	1, 2. As required to address concerns	Soma Energy/Polat Energy
Communities Hıdırbalı Neighbourhood, Dikmeler Neighbourhood and Yukarıkaraçam Neighbourhood	Potential Cumulative Impacts of the Soma Kolin Thermal Power Plant ("TPP") (in construction) and Soma 4 WPP	Construction	Provision of information on: <ul style="list-style-type: none"> Noise Management Plan and Monitoring results Air Quality Management Plan and Monitoring results (including dust) if applicable Traffic Management Plan Biodiversity Action Plan Community Health and Safety Plan 	1. Community Meetings 2. Meetings with the relative Mukhtars	1, 2. As required to address concerns	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> Noise Management Plan and Monitoring results Air Quality Management Plan and Monitoring results (including dust) if applicable Traffic Management Plan Biodiversity Action Plan Community Health and Safety Plan 	1. Community Meetings 2. Meetings with the relative Mukhtars	1, 2. As required to address concerns	Soma Energy/Polat Energy
Communities Hıdırbalı Neighbourhood, Dikmeler Neighbourhood and Yukarıkaraçam Neighbourhood	Potential Cumulative Impacts of the existing Bilgin WPP and Soma 4 WPP	Construction	Not applicable as existing Bilgin WPP is already in operation.	N/A	N/A	-
		Operation	Provision of information on: <ul style="list-style-type: none"> Noise Management Plan and Monitoring results Traffic Management Plan Biodiversity Action Plan Community Health and Safety Plan 	1. Community Meetings 2. Meetings with the relative Mukhtars	1, 2. As required to address concerns	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Communities TEİAŞ Construction contractors Employees	Management of risks on the biodiversity components by the Project.	Construction	Provision of information on biodiversity management to: <ul style="list-style-type: none"> ■ Discuss forestry management issues, related to the protection and enhancement of forests through transplantation and tree preservation; ■ Discuss roadkill prevention, and implementation of speed limits and training of workers and local land users; and ■ Training employees and contractors for the Project the approach of no hunting within the Project Area. 	<ol style="list-style-type: none"> 1. Workshops 2. Individual and Community meetings 3. Focus group discussions 4. Meetings with relevant NGOs 	<ol style="list-style-type: none"> 1, 4. As required to support offset planning 2,3. As required 	Soma Energy/Polat Energy

		Operation	<p>Provision of information on biodiversity management to:</p> <ul style="list-style-type: none"> ■ Discuss forestry management issues, related to the protection and enhancement of forest through transplantation and tree preservation; ■ Discuss roadkill prevention, and implementation of speed limits and training of workers and local land users; ■ Training employees and contractors for the Project the approach of no hunting within the Project Area; ■ Identify landowners and land users; ■ Convey the good intentions of Soma Energy/Polat Energy to minimize the possible negative effects of the project activities such as the impediment of access to the pasturelands and to appropriately compensate shepherds for the loss of access to the pasture and water for the Project duration; 	<ol style="list-style-type: none"> 1. Workshops 2. Individual and community meetings 3. Focus group discussions 4. Meetings with relevant NGOs 	<p>1, 4. As required to support offset planning</p> <p>2, 3. As required</p>	Soma Energy/Polat Energy
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Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
			<ul style="list-style-type: none"> Understand and respond to their concerns/suggestions about the Project. 			
Non-governmental organizations (NGOs)	Social progress, economic and social development, and environmental protection.	Construction	Provision of information on: <ul style="list-style-type: none"> Mitigation measures against potential environmental and social risks; Sustainability criteria; Social responsibility projects implementation principles; and Cumulative impacts of projects in the region. 	1. Focus Group meetings 2. Workshops 3. Company website 4. Surveys	1. As required/As requested 2, 3, 4. As required	Soma Energy/Polat Energy
		Operation	Provision of information on: <ul style="list-style-type: none"> Mitigation measures against potential environmental and social risks; Sustainability criteria; and Cumulative impacts of projects in the region. 	1. Focus Group meetings 2. Workshops 3. Company website 4. Surveys	1. As required/ as requested 2, 3, 4. As required	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Municipalities and Mukhtar offices	Management of environmental and social risks of the Project.	Construction	Provision of information on: <ul style="list-style-type: none"> Local employment; The environmental monitoring program; Environmental monitoring results; Overall information about progress of the Project; Support in reaching vulnerable groups; and Cumulative impacts of projects in the region. 	<ol style="list-style-type: none"> Planned Meetings (with Mukhtars) Brochures Workshops 	<ol style="list-style-type: none"> As required 3. As required/ as requested 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> Local employment; The environmental monitoring program; Environmental monitoring results; Overall information about progress of the Project; Support in reaching vulnerable groups; and Cumulative impacts of projects in the region. 	<ol style="list-style-type: none"> Planned Meetings (with Mukhtars) Brochures Workshops 	<ol style="list-style-type: none"> As required 3. As required/ as requested 	Soma Energy/Polat Energy
Governmental Authorities	Project activities and schedule. Management of environmental and social risks by the Project.	Construction	Provision of information on: <ul style="list-style-type: none"> Project activities and schedule; Management and monitoring plans for social issues, environment and health; and Cumulative impacts of projects in the region. 	<ol style="list-style-type: none"> Meetings with governmental institutions 	<ol style="list-style-type: none"> As required 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Project activities and schedule; ■ Management and monitoring plans for social issues, environment and health; and ■ Cumulative impacts of projects in the region 	1. Meetings with governmental institutions	1. As required	Soma Energy/Polat Energy
Media	Project activities. Management of environmental and social risks generated by the Project.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Transparent communication connection and positive reaction of printed and visual media. 	1. Press releases 2. Interviews with the media	1. and 2. As required.	Soma Energy/Polat Energy
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Transparent communication connection and positive reaction of printed and visual media. 	1. Press releases 2. Interviews with the media	1. and 2. As required.	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Vulnerable Groups	Project activities, Management of environmental and social risks by the Project, Grievance mechanism, Employment and any other interest of vulnerable groups.	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; ■ Training of staff; ■ Procurement of supplies and services; ■ Use of roads, water and other infrastructure, increase in traffic density; ■ Local employment; ■ Important commercial opportunities; and ■ Environmental impacts. 	<ol style="list-style-type: none"> 1. Planned meetings targeting any identified vulnerable groups 2. Women only meetings 3. Workshops 4. Individual and community meetings 5. Focus group discussions 6. NTS 	<ol style="list-style-type: none"> 1-2. As requested, 3-5. When required 6. At the beginning of the construction phase 	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Recruitment of employees; ■ Training of staff; ■ Procurement of supplies and services; ■ Use of roads, water and other infrastructure, increase in traffic density; ■ Local employment; ■ Important commercial opportunities; and ■ Environmental impacts 	<ol style="list-style-type: none"> 1. Planned meetings targeting any identified vulnerable groups 2. Women only meetings 3. Workshops 4. Individual and community meetings 5. Focus group discussions 6. NTS 	1-2. As requested, 3-5. When required 6. At the beginning of the operation phase	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Polat Energy and Soma Energy employees	Employee welfare	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Employee Grievance Mechanism; ■ Labour rights; and ■ OHS procedures. 	1. Bulletin 2. Face-to-face interviews 3. OHS Committee 4. Trainings 5. Company social events for employees 6. Employee grievance mechanism	1-5. As required 6. When required due to the grievance mechanism	Soma Energy/Polat Energy
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Employee Grievance Mechanism; ■ Labour rights; and ■ OHS procedures. 	1. Bulletin 2. Face-to-face interviews 3. OHS Committee 4. Trainings 5. Company social events for employees 6. Employee grievance mechanism	1-5. As required 6. When required due to the grievance mechanism	Soma Energy/Polat Energy

Stakeholder Group	Topics of Interest in the Project	Phase	Purpose of Engagement	Engagement Vehicle/ Methods	Schedule or Frequency	Responsible Party
Soma 4 WPP Project contractor employees	Employee welfare	Construction	Provision of information on: <ul style="list-style-type: none"> ■ Employee Grievance Mechanism; ■ Labour rights; ■ OHS procedures; and ■ Contractor management. 	1. Bulletin 2. Face-to-face interview 3. OHS Committee 4. Labour audits/reviews	1-4. Monthly, or when determined to be necessary due to the results of the grievance mechanism.	Soma Energy/Polat Energy
		Operation	Provision of information on: <ul style="list-style-type: none"> ■ Employee Grievance Mechanism; ■ Labour rights; ■ OHS procedures; and ■ Contractor management. 	1. Bulletin 2. Face-to-face interview 3. OHS Committee 4. Labour audits/reviews	1-4. Monthly, or when determined to be necessary due to the results of the grievance mechanism.	Soma Energy/Polat Energy

APPENDIX C

**SOMA ENERGY EXTERNAL
GRIEVANCE FORM**

EXTERNAL GRIEVANCE FORM

Information about the complainant		
Name and Surname:	Only for internal use: How is the complaint made? 1. In person 2. By phone 3. By mail 4. By e-mail 5. Other (specify).....	
Date: ____/____/____		
Address		
Phone		
E-mail		
Name and Surname of the person taking the complaint		Date of complaint and signature:
DETAILS OF COMPLAINT		
Case summary: • Case for one time (date of problem/complaint) • Does the problem occur more than one? <input type="checkbox"/> Yes, (how many times?.....) <input type="checkbox"/> No • Does the problem/complaint continue? (If "Yes", provide details):		
Only for internal usage: Record and Respond		
Complaint reference number:	Date of complaint log:	
Name of personnel recording the complaint	Copy transfer: • Relevant unit • Other (specify).....	
Required action:		
Only for internal usage: Status of compliant		
	Date:	Signature:
Complaint is closed by:		

APPENDIX D

**SOMA ENERGY INTERNAL
GRIEVANCE FORM**

INTERNAL GRIEVANCE FORM

Reference No:		
Full Name Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent	Name & Surname: _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: <div style="float: right; text-align: right;"> What happened? Where did it happen? Who did it happen to? What is the result of the problem? </div>		
Case summary:		
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
Complaint is closed by:		
Actions taken (Provide details):		

APPENDIX E

**SOMA ENERGY GRIEVANCE
DATABASE TEMPLATE**

Grievance Database

The following template will assist in recording comments, complaints and grievances for monitoring purposes.

Name/Contact details of the complainant	Internal/External	Grievance Received by	Date received	Details of complaint/comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date resolved	Communication with complainant**

*notification date and method (via call/face to face): If the complainant has provided a name and contact information, he/she will be notified within 10 days that the grievance solution process has started

** notification date and method (via call/face to face): If the complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved.



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