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STAKEHOLDER ENGAGEMENT PLAN

Sarıyer-Kilyos Tunnel Project

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ABBREVIATION

Aol	Area of Influence
CLO	Community Liaison Officer
E&S	Environmental and Social
EPC Contractor	İC İÇTAŞ İnşaat Sanayi ve Ticaret A.Ş.
ESHS	Environmental, Social and Health and Safety
ESMS	Environmental and Social Management System
EU	European Union
GBVAW	Gender-based Violence Against Women
GC	Grievance Committee
GRM	Grievance Redress Mechanism
HR	Human Resources
HS	Health and Safety
IFC	International Finance Corporation
İMM	İstanbul Metropolitan Municipality
İşkur	Turkish Employment Agency
KGM	General Directorate of Highways
MoEUCC	Ministry of Environment, Urbanisation and Climate Change
MoLSS	Ministry of Labour and Social Security
NGO	Non-Governmental Organization
NMM	Northern Marmara Motorway
PAP	Project Affected Persons
Project Company	ICA İÇTAŞ Altyapı Yavuz Sultan Selim Köprüsü ve Kuzey Çevre Otoyolu Yatırım ve İşletme A.Ş.
PS	Performance Standard
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
The Project	Sarıyer-Kilyos Tunnel Project



1.0 INTRODUCTION

1.1 PURPOSE OF DOCUMENT

The main purpose of this document is to define how stakeholder engagement will be undertaken to enable various stakeholders to express their views, opinions and grievances, while enabling ICA to respond appropriately to these stakeholders¹ during the land acquisition, construction and operation phases of the Project. In summary, the objectives of the SEP are as follows:

- Identify key stakeholders who may be affected by the Project or who may influence the outcome of the Project;
- Define the processes required to inform the identified stakeholders about the Project and manage stakeholder expectations;
- Define the frequency and timeline for engagement of different stakeholder groups;
- Understand existing and potential emerging issues and obtain the views and concerns of relevant stakeholders about the Project;
- Provide a basis for stakeholder engagement in environmental and social impact identification, impact prevention and mitigation, including impacts and risks associated with Gender-Based Violence and Harassment, including Sexual Abuse and Harassment;
- Propose a platform for feedback on existing mechanisms to address these impacts; and
- Establish a grievance mechanism to be implemented for the project.

This SEP is a "living document" that will be regularly updated as the Project progresses through various stages of development

The final version of the SEP will be published on the Project website (<http://www.ictas.com.tr/TR/Insaat>) throughout the Project period.

1.2 PROJECT DESCRIPTION

Infratech ESP ("Consultant") has been appointed by ICA İçtaş Altyapı Yavuz Sultan Selim Köprüsü ve Kuzey Çevre Otoyolu Yatırım ve İşletme A.Ş. ("ICA" or the "Project Company") as the Environmental and Social Consultant for the preparation of the Stakeholder Engagement Plan and certain management plans for the Northern Marmara Motorway Sarıyer - Kilyos Tunnel Project (the "Project") in Istanbul, Turkey.

The Project Company is also the Company assigned for the development, construction and operation of the Section Odayeri-Paşaköy (including Third Bosphorus Bridge) of Northern Marmara Motorway Project ("NMM Project"). The Sarıyer – Kilyos Tunnel Project, which includes construction of a 7 km long twin tube tunnels and connection roads comprising a viaduct and two underpass structures, has been accepted as a continuing part of the Uskumruköy access road, connecting Sarıyer Çayırbaşı and Uskumruköy roundabout; therefore, its construction will be included under the NMM Project as an additional work. The Project Company has entered into an EPC (Engineer, Procure and Construct) contract with IC

¹ Stakeholders refer to all persons and parties interested in or affected by the Project, such as local people/villagers, local, regional, and national government departments, commercial organisations, non-governmental organisations, workers and workers' organisations.

İÇTAŞ İnşaat Sanayi ve Ticaret A.Ş. (İC İÇTAŞ or the “EPC Contractor”) to execute construction of the Project.

Sarıyer – Kilyos Tunnel Project is accepted as a continuing part of the Uskumruköy access road, connecting Sarıyer Çayırbaşı and Uskumruköy roundabout, and therefore its construction will be included under the NMM Project as an additional work. The Tunnel Project will consist of a 6,9 km 2-lane 2-tube tunnel and 1,3 km 2x2 lane connection road.

The Sarıyer – Kilyos Tunnel is planned to be constructed 170 m below ground level and according to ICA; at this depth, the tunnel will be the deepest TBM tunnel. The tunnel is planned to be available for all type of vehicles except vehicles carrying dangerous goods. This new route will not be subject to toll transit, and there will be no toll booths at its entrance and exit. The tunnel is planned as a 'high speed tunnel' and the speed limit within the tunnel will be 110 km/hr; as such, the tunnel will make access of ambulance and other emergency vehicles more convenient.

The Project is an additional work to Northern Marmara Motorway (including Third Bosphorus Bridge) Project, Odayeri – Pasakoy (Including Third Bosphorus Bridge) section as set out in the protocol signed by and between the Project Company and General Directorate of Highways (Karayolları Genel Müdürlüğü (KGM)) on 25 March 2022. The construction period for the Project is set out as 48 months.

Infratech ESP conducted a site visit on 21-22 November 2023 and 8-9 November 2023 in Sarıyer and Kilyos with the participation of an environmental consultants, a biodiversity consultants and a social consultant from Infratech Turkey. During the site visit, the local authorities along the tunnel route were interviewed and their opinion on the Project was obtained. During the site visit, the status of site activities, controls and practices for social aspects were reviewed. Concerns and expectations regarding the Project were recorded and constitute the baseline for this report.



2.0 NATIONAL AND INTERNATIONAL STANDARDS

2.1 NATIONAL LEGISLATION

The Project is required to comply with relevant national laws and regulations relating to environmental and social issues. Important laws include, but are not limited to, the Environmental Law, the Labour Law, the Occupational Health and Safety Law, the Expropriation Law, the Law on the Right of Access to Information and the Law on the Exercise of the Right to Petition, the Constitution of the Republic of Turkey (1982) and the Turkish Penal Code No. 5237 (2004), which are briefly mentioned below:

National Environmental Law No. 2872, enacted in 1983, is Turkey's primary framework for environmental legislation and is supported by a series of regulations developed in line with national and international initiatives and standards, some of which have recently been revised for harmonisation with European Union (EU) Directives as part of Turkey's pre-accession efforts. Labour, health and safety issues are collectively governed by Labour Law No. 4857, Occupational Health and Safety Law No. 6331 and related regulations.

The expropriation process in Turkey is governed by the provisions of Expropriation Law No. 2942. Law No. 4982 on the Right to Information and Law No. 3071 on the Exercise of the Right to Petition are the relevant laws enabling individuals to exercise their right to information and their right to apply to the competent authorities in relation to their requests and complaints, respectively.

The Constitution of the Republic of Turkey (1982) aims to guarantee the freedom and rights of individuals and societies. The Constitution covers land acquisition rights, working conditions, labour rights, right to form trade unions, prohibition of forced labour and child labour, etc.

Articles 5 and 122 of the Turkish Penal Code No. 5237 (2004) aim to prevent gender discrimination.

2.2 RELEVANT INTERNATIONAL STANDARDS AND PRINCIPLES

International standards that the EPC Contractor must comply with are IFC Performance Standards.

The main objectives of international standards and principles are:

- ▶ Developing an appropriate procedure for identifying and identifying and confirming persons and communities and other interested parties who have impacted, affected and/or likely to be affected by the activities or practices of the EPC Contractor;
- ▶ Preparation and continuous updating of a database of relevant stakeholders and associated facilities of the EPC Contractor;
- ▶ Continuous review of this database by seeking the opinion of interested parties;
- ▶ Providing necessary information and consultancy services to stakeholders in order to ensure necessary participation in environmental and social issues that may affect them; and
- ▶ Continuing and actively maintaining respectful and constructive relations with stakeholders based on mutual trust and honesty and taking into account the values of stakeholders.

The basic requirements of international standards and principles are:



- Identification of stakeholders,
- Preparation of Stakeholder Engagement Plan,
- Providing the necessary information about the EPC Contractor to the affected or likely to be affected communities,
- Providing important consultancy services by ensuring early and continuous participation,
- A grievance and feedback mechanism should be put in place in a timely manner, targeting stakeholders' concerns, complaints, wishes and requests regarding the EPC Contractor.

2.2.1 IFC Performance Standards

IFC has determined 8 standards covering all social and environmental components and issues.

Performance standards are given below:

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

IFC Performance Standard 1 outlines the SEP. Therefore, the SEP will be prepared according to the basic framework defined by IFC PS 1 and will be developed in a way to include the management of stakeholder engagement activities included in other performance standards.

The importance of including the stakeholders in the environmental and social performance management process has been emphasized within the purpose and scope of Performance Standard 1. An effective Environmental and Social Management System is a dynamic and continuous process implemented and supported by the company management and includes the participation of the client, the employee, the local community directly affected by the project (Affected Communities) and, if any, other relevant stakeholders².

The following requirements for a meaningful stakeholder engagement are set out in IFC Performance Standard 1 as follows:

“Performance Standard 1 means (i) developing a comprehensive assessment to identify the environmental and social impacts, risks and opportunities of projects, (ii) engage effectively

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<https://www.ifc.org/wps/wcm/connect/2ee7f9f177a34739a9a4146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=JlApldX>



by publicizing project related information and consulting with them on issues that directly affect local communities, (iii) the client's environmental and social reveals the importance of managing its performance”³.

- ▶ Stakeholder engagement according to IFC standards, ensures the basis for the Project Owner to establish strong, constructive, and sensitive relationships with stakeholders.
- ▶ The stakeholder engagement process should be initiated at the earliest stage of the Project lifecycle, in land acquisition, economic and physical displacement and should continue throughout the life of the project.
- ▶ An effective stakeholder engagement mechanism ensures that affected communities and other relevant people and organizations are fully informed and meaningfully participate in monitoring the process.
- ▶ Stakeholder engagement facilitates provide the identification of avoidance, minimization, mitigation and remediation measures that are appropriate and sustainable.

Within the scope of IFC Standards, stakeholder engagement of the Project has been developed in line with the principles and strategies set out and explained below.

- a) Information Sharing: The information sharing studies carried out in the stakeholder engagement process of the project should ensure that the following components are understood by the stakeholders:
 - i. The purpose and scale of the project,
 - ii. Duration of the project activities,
 - iii. Risks, potential impacts, and related mitigation measures on affected communities defined in the Stakeholder Engagement Plan,
 - iv. Tools and methods of the stakeholder engagement process,
 - v. Access to information on the Grievance Redress Mechanism should be clearly explained.
- b) Consultation: For an effective stakeholder engagement, the consultation process should comply with the following principles.
 - i. Consultations will take place early in the process of identifying environmental and social impacts and risks and will continue as risks and impacts occur.
 - ii. Consultations will be based on transparent, objective, meaningful, accessible information in culturally appropriate narration and in a format that the affected communities can understand.
 - iii. Inclusive participation should focus on directly affected people, before the indirectly affected.
 - iv. There should be no external guidance, intervention or coercion.
 - v. Consultation processes to be carried out should be recorded.
- c) Informed Consultation and Participation: An informed consultation and engagement process based on the steps in the consultation process stated above will take place

³ <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standard-1>

when projects have significant impacts on Affected Communities. In this consultation process;

- i. If needed, opinions of both men and women will be obtained through separate meeting or participation methods, and the different concerns and priorities of men and women regarding project impacts, mitigation mechanisms, benefits of the project will be learned.
 - ii. Measures to prevent or reduce negative impacts and risks will be recorded and information will be provided on how the concerns of the affected people are taken into account⁴.
- d) A procedure will be prepared and implemented within the scope of IFC standards and recommendations on communication and complaint mechanism, which is one of the most important elements of stakeholder relations and stakeholder consultation process.

This procedure should include below items, in accordance with IFC Performance Standard 1 ;

- i. To answer and record external feedback from the public,
- ii. To prioritize and evaluate the issues raised, to determine how to respond,
- iii. To respond, follow and document the answers given,
- iv. To develop the methods required to properly update the stakeholder management program.

Along with the above requirements, in the Performance Standard 1 Evaluation and Management of Environmental and Social Risks and Impacts document published in January 2012 by IFC, "Where there are Affected Communities, the client will establish a Grievance Redress Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance".

According to IFC standards, the Grievance Redress Mechanism should aim to address concerns urgently, using a culturally appropriate, accessible, understandable and transparent consultation process. The party that raises a concern or complaint should not face any price or sanction. The complaint mechanism should not be an obstacle to resorting to legal or administrative remedies.

⁴ <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standard-1>

3.0 IDENTIFICATION AND MATCHING OF STAKEHOLDERS

3.1 INTRODUCTION

The purpose of identifying stakeholders is to identify individuals or organisations that may be directly or indirectly, positively or negatively affected by the Project or that have an interest in the Project. Stakeholders identified for inclusion in engagement activities fulfil one of the following criteria:

- Interest in the Project,
- Likely to be affected by or have an impact on the Project (negatively or positively), or
- Individuals and organisations that can provide feedback on issues and concerns related to the Project.

3.2 BASIC PRINCIPLES OF STAKEHOLDER ENGAGEMENT

The key objectives of early strategic stakeholder engagement in IFC's "Strategic Approach to Early Stakeholder Engagement" include

Building an understanding of the local context, including stakeholder mapping and analysis;

- Building relationships based on trust and transparency,
- Ensuring stability in stakeholder engagement and communication,
- Managing stakeholder expectations through a gradual, stage-appropriate approach,
- Establish an early, accessible and accountable grievance mechanism for dispute management,
- Endeavour to create "win-win" scenarios for the company and stakeholder groups; and
- Avoiding social risks and minimising their impact.
- Mitigate risks and maximise opportunities to create and protect value for the project and local communities.

IFC's Handbook of Good Practice on Stakeholder Engagement is widely used and has proven to be a practical and applicable source of information and guidance. According to IFC's Handbook of Good Practice on Stakeholder Engagement, a good discussion and engagement process should be as follows:

- Targets those most likely to be affected by the project,
- Developed early enough to cover important issues that may have an impact on the project decisions to which they relate,
- Being informed as a result of sharing important information in advance,
- The content presented is meaningful to the interviewees, as it is in an easily understandable format and the techniques used are culturally appropriate,
- It should be two-way to ensure that both parties have the opportunity to share views and information, to be listened to and to have their issues addressed,
- Be gender inclusive, recognizing that men and women often have different views and needs,
- Localized to reflect appropriate timelines, context and local languages,
- Free from manipulation or coercion,
- Documentation of who was interviewed and key issues raised for follow-up,
- Providing timely feedback to interviewees to explain next steps; and
- To continue throughout the life of the Project.

3.3 IMPORTANT INFORMATION FOR CONTACT

Below are some of the key messages to be shared with Stakeholders:

- Project Background,
- Project Description and Location,
- Project Activities,
- Potential benefits realised by the Project and impacts of the Project,
- The Process to be implemented to ensure stakeholder engagement; and
- How and when stakeholders can participate in the initiative development.

It is also important to share the following information with Project stakeholders as necessary:

- Construction activities,
- Any disruption to public services,
- Opportunities to raise grievances and how to do so,
- Potential impacts of construction and operational activities,
- List of grievances received and resolved - to ensure that stakeholders do not rely on rumours as the main source of Project information; and
- In particular, there will be a need to inform stakeholders about all planned Project activities and potential risks and impacts on them, as well as opportunities.

3.4 IDENTIFICATION OF STAKEHOLDERS

Stakeholders refer to persons or groups of persons or groups who are directly or indirectly affected or likely to be affected by a project (project-affected parties) and parties with interests in the project and/or the ability to positively or negatively influence its outcome (other interested parties). (World Bank ESS10) The term 'project-affected parties' includes parties likely to be affected by the project due to actual impacts or potential risks to the physical environment, health, safety, cultural practices, well-being or livelihoods. These stakeholders may include individuals or groups, including local communities (World Bank Guidance Note 5.1 and EBRD PR 10 Guidance Note 15⁵). The term 'other interested parties' refers to individuals, groups or organisations that may have an interest in the project because of its location, characteristics, impacts or issues of public interest. These parties may include, for example, regulators, government officials, the private sector, the scientific community, academics, trade unions, women's organisations, other civil society organisations and cultural groups (World Bank Guidance Note 5.2 and EBRD PR 10 Information Sharing and Stakeholder Engagement).

Stakeholder identification and engagement is an ongoing process and stakeholders will continue to be updated at different stages of the Project (construction and operation). The SEP will be updated as necessary to reflect all newly identified stakeholder groups during the construction and operation phases of the Project. This process will be undertaken by the Client as part of the SEP update activities.

Stakeholder groups identified through desk research, field visits and discussions are presented below.

- Land Owners;
- Land Users (formal and informal users);

⁵ <https://www.ebrd.com/information-disclosure-and-stakeholder-engagement.pdf>

- Vulnerable Groups (including children, people with disabilities, women and migrants);
- Sensitive receptors such as schools, mosques, parks used by children and the elderly;
- Affected business owners, employees and tenants;
- Local communities;
- Mukhtars of neighbourhoods where the Project passes through;
- RAP implementation partners such as KGM, KOSGEB, İŞKUR and Chamber of Agricultural Engineers co-operatives;
- Other Government organisations and Regulatory authorities;
- Universities
- NGOs;
- Press Organisations;
- Labour Unions and
- Internal stakeholders (workers, contractors, suppliers, etc.)

A preliminary list of stakeholders is presented in Annex A and will be updated as new stakeholders are identified.

3.4.1 Vulnerable Groups

It is particularly important to understand the impacts of the Project and whether they disproportionately affect disadvantaged or vulnerable individuals or groups who often do not have the opportunity to raise concerns or understand project impacts. Vulnerable persons directly, indirectly or potentially affected by the Project include

- informal workers
- refugees
- women
- young people and children
- mothers of young children
- elderly/retired persons
- ethnic minorities (including Roma)
- low-income households:
- physically/mentally disabled and
- groups discriminated against on the basis of social identity (e.g. sexual orientation and gender identity).

3.4.1.1 Informal Workers

Informal workers are vulnerable to harassment as they work in dubious conditions and do not have benefits, insurance or protections (for accidents, sickness, etc.). As refugee and migrant worker groups have fewer options and may face barriers to accessing vital information about their rights, such as language barriers, they are more vulnerable to falling victim to informal labour arrangements. Therefore, relevant information should be available in languages other than Turkish (e.g. Arabic) and culturally must be shared appropriately. Young people and children can also be negatively affected by informal working arrangements. It can be difficult

for children to access and, more importantly, understand important information. Therefore, all communications should be in clear and easy language. As women in Turkey are more likely to be affected by informal labour arrangements, special outreach is needed to inform them of their rights.

3.4.1.2 Women

Project impacts may disproportionately affect women in several areas, such as employment opportunities, OHS measures and increased exposure to gender-based violence and harassment. Therefore, as women are likely to be in different social spheres than men, specific outreach activities are required to communicate key project information to women. Information leaflets should be distributed to relevant government offices and NGOs working specifically with women within the Area of Influence, and information sessions should be organised in areas where women are likely to be present. It is important to organise stakeholder meetings specifically for women to ensure that women have the opportunity to put forward their views and concerns without men present, as these are likely to yield different results than mixed meetings. Where possible, childcare should be provided for the time of the meeting. Meetings should be held at a time that women prefer, possibly during the day or in the afternoon. Furthermore, since women are less likely than men to have their own cars, all meetings should be held in locations that are easily accessible by public transport.

NGOs specialising in women's rights may also have a better network and access methods to effectively share important information with women affected by project impacts within the Area of Impact.

3.4.1.3 Elderly, Pensioners, Disabled Persons

The elderly and people with disabilities are also affected by the project (especially elderly couple living in a house near south portal of the Tunnel). Therefore, it should be taken into consideration that these people may not have the same mobility as other affected groups. Therefore, stakeholder engagement meetings should be held in central locations that are easily accessible and accessible to people who may face difficulties due to physical disabilities. Furthermore, information should be shared with these groups in easy language, both written and spoken, using large fonts for any written information and, where possible, additional graphics and visuals to inform and educate about the process. For meetings that are likely to involve elderly or people with disabilities, meetings should preferably be held during the daytime to increase the safety of participants when travelling to the meeting location. Elderly and disabled people may not want to leave their homes at night.

Important information on the specific needs of vulnerable stakeholder groups can be summarised in a tabular format. Table 1 below shows an example of summarising vulnerable stakeholder needs. Such a list should be prepared and updated regularly throughout the life cycle of the project as new information is received.

Table 1 Stakeholder Engagement Programme for Vulnerable Groups

Stakeholder Group	Key Features	Sensitivity to Risk	Language Needs	Preferred means of notification (e- mail, telephone, radio, letter)	Special needs (accessibility, large font, childcare, daytime meetings)
Women with young children	There are women with young children in all neighbourhoods, but	Informal labour arrangements, gender based	Official language, easy	Written information, radio,	Childcare for meetings, preferred timing

	especially in Büyükdere neighbourhood, the number of poor women raising their children alone is high.	violence and harassment	language use	participation of women-specific NGOs	is in the afternoon, meeting location should be easily accessible by public transport
Elderly, Disabled persons	There are elderly and disabled individuals in all neighborhoods, and in addition, an elderly couple living in a house near south portal of the Tunnel was identified.	These individuals may have more difficulty in coping with changes.	Easy language use	Radio, TV, oral communication (considering possible illiteracy)	Large fonts, easy accessibility of the location for stakeholder meetings, preferred meeting time is daytime

3.5 STAKEHOLDER ANALYSIS AND MAPPING

There are various stakeholder groups identified in the sub-section and the profile of each stakeholder group is different. One of the key groups identified is government agencies and regulatory authorities, which can be grouped at country, provincial, district and local (i.e. neighbourhood) levels. These organisations include authorities with legal responsibilities related to the Project or environmental and social issues, and some other departments are responsible for providing Project-related infrastructure. A list of governmental and other public organisations that are important to the Project and whose functions are relevant to the Project is provided in Table 2.

Table 2 Duties of Administration and Public Organisations

Level	Institution	Project Phase	Relevance to the Project
National	Ministry of Transport and Infrastructure, General Directorate of Infrastructure Investments	Construction and Operation	The Ministry of Transport and Infrastructure has regulatory functions such as issuing relevant permits for infrastructure investments.
	Ministry of Transport and Infrastructure, General Directorate of Highways	Construction and Operation	General Directorate of Highways has the authority to plan the project, outsource the construction and operate it. The General Directorate of Highways develops routes and determines technical specifications. The General Directorate of Highways also carries out land acquisition and transfers the land to the contractor.
	Ministry of Environment, Urbanisation and Climate Change (MoEUCC), General Directorate of EIA, Permit and Inspection	Construction	MoEUCC has regulatory functions related to the Project such as environmental impact assessment permits and environmental permits.
	Ministry of Environment, Urbanisation and Climate Change (MoEUCC), General Directorate of Environmental Management	Construction	
	Ministry of Environment, Urbanisation and Climate Change (MoEUCC), General Directorate of Spatial Planning	Construction	
	Ministry of Labour and Social Security (MoLSS), General Directorate of Occupational Health and Safety	Construction and Operation	The MoLSS may have specific views on labour and working conditions and occupational health and safety.
	MoLSS, General Directorate of Labour	Construction and Operation	
	MoLSS, Social Security Institution	Construction and Operation	
Provincial	İstanbul Governorship	Construction and Operation	The governorate is the highest authority representing the national administration in the province.
	İstanbul Metropolitan Municipality (İMM)	Construction and Operation	The Municipality and its relevant departments have responsibilities for the Project (e.g. issuing permits and licences for construction works and traffic planning).
	İMM, Department of Fire Brigade	Construction and Operation	The responsible organisation to intervene in case of fire is the fire brigade.

Level	Institution	Project Phase	Relevance to the Project
	İstanbul Provincial Directorate of Environment and Urbanisation	Construction	Istanbul Provincial Directorate of Environment and Urbanisation has regulatory functions related to the Project such as environmental impact assessment permits and environmental permits. Istanbul Provincial Directorate of Environment and Urbanisation may have opinions on the construction activities of the Project.
	İstanbul Provincial Directorate of Disaster and Emergency	Construction and Operation	This organisation has the function of managing and responding to emergencies.
	112 İstanbul Provincial Directorate of Emergency Medical Services	Construction and Operation	In case of adverse health problems, 112 Emergency Medical Services are informed.
	İstanbul Provincial Directorate of Culture and Tourism	Construction	This organisation can provide specific opinions in relation to the archaeological potential of construction sites.
District/Local	Sarıyer District Governorship	Construction and Operation	In emergency situations, local municipalities and district governorships and their relevant organizations may be important. Additionally, these authorities, together with the headmen of their neighborhoods around construction sites, may have specific opinions on Project activities. They can also be important actors in reaching the public, especially vulnerable groups, for information sharing and engagement activities. Mukhtars also often play intermediary and access supporting roles for complaints and the grievance mechanism.
	Sarıyer Municipality	Construction and Operation	
	Neighbourhood Mukhtars (Kilyos, Demirciköy, Uskumruköy, Gümüşdere, Zekeriyaköy, Rumeli Kavağı, Maden, Yenimahalle, Merkez (Sarıyer), Kocataş, Büyükdere, Kazım Karabekir Paşa, Çayırbaşı, Odayeri)	Construction and Operation	This organisation can provide specific opinions in relation to the archaeological potential of construction sites
	Istanbul Archaeology Museum	Construction and Operation	
	Sarıyer National Parks Regional Directorate	Construction and Operation	
	Turkish Employment Agency (İşkur) Sarıyer Branch	Construction and Operation	İşkur offices register job seekers and help them find jobs, especially unskilled and semi-skilled labour. İşkur offices can therefore provide local employment within the Project.

Table 3 provides profiles of the Project's various stakeholder groups. Analyses of the impact of each stakeholder group on the Project and the impacts of the Project on each stakeholder group are presented.

Table 3 Stakeholder Map

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
Primary Stakeholders (external)				
Landowners whose land will be acquired	<ul style="list-style-type: none"> This group consists of private landowners whose land parcels fall within the Project's land footprint area; According to Expropriation data dated December 2023 The total number of shareholders of the 7 privately owned parcels (real persons) is 102, including duplicate names for the same and/or different parcels; This group, most of them live outside the project affected neighbourhoods and their livelihoods are not based on these lands. 	<ul style="list-style-type: none"> The lands identified for the Project are not used for pasture, animal grazing and agriculture, Land acquisition for Project activities will affect this stakeholder group. 	<ul style="list-style-type: none"> Supporting this group is essential for the smooth continuation of project-related activities; The impact of stakeholder groups on the Project depends on a smooth land acquisition process and adequate and timely compensation for expropriated land. 	<ul style="list-style-type: none"> Provision of timely and adequate information related to land acquisition and ensuring proper participation.
Land users (formal and informal users)	<ul style="list-style-type: none"> There may be land users using the land without any formal title deed or lease agreement; A total of 2 user has been identified so far. 	<ul style="list-style-type: none"> These groups are at risk of being affected by loss of livelihoods and not being compensated or receiving mitigation assistance because they do not have formal rights to land. 	<ul style="list-style-type: none"> The impact of this group on the Project is limited as they have no legal claim to the land; This group may be used as unskilled labour with priority for recruitment during the construction phase of the Project. 	<ul style="list-style-type: none"> This Stakeholder group may expect work as construction workers during the construction phase of the Project.
Local businesses that will be affected by	<ul style="list-style-type: none"> There is a restaurant on a land expropriated within the scope of the project. 	<ul style="list-style-type: none"> Negative impacts on these enterprises may occur from 	<ul style="list-style-type: none"> The project can benefit from the provision of cheap local services and goods as required. 	<ul style="list-style-type: none"> This stakeholder group may be affected by factors such as dust,

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
Project-related activities	Although this restaurant is not included in the part to be expropriated, the outer walls are expected to be demolished.	<p>dust, noise, vibration, traffic and access problems;</p> <ul style="list-style-type: none"> Certain areas of these enterprises can be heavily affected by dust if not well managed; Since there will be purchases to be made by the Project as well as by the workers during the construction phase, there will also be positive effects such as a possible increase in sales; 		noise, traffic density during the construction period of the Project due to its location.
Informal Local Organisations that will be affected by Project-related activities	<ul style="list-style-type: none"> There is an enterprise engaged in scrapping activities on a land to be expropriated. This enterprise has been operating on the land for 25 years. 	<ul style="list-style-type: none"> This stakeholder group may be affected by dust, noise and traffic intensity during the construction period of the Project. 	<ul style="list-style-type: none"> The project can benefit from the provision of cheap local services and goods as required. 	<ul style="list-style-type: none"> This stakeholder group may be affected by factors such as dust, noise, traffic density during the construction period of the Project due to its location.
Vulnerable social groups such as women-headed households, the elderly, the disabled and the poor.	<ul style="list-style-type: none"> This stakeholder group consists of groups/households that are considered vulnerable due to their social, political or economic status in society. There are very poor households especially in Büyükdere neighbourhood. It was reported that the number of illiterate women in Büyükdere neighbourhood is high. 	<ul style="list-style-type: none"> The impact of the Project on this group is of a similar nature to all neighboring communities because this group is a subset of neighboring communities; The nature of the effects on this group is the same as the effects on the broader public, but the effect size may be higher due to their sensitivity; This group may be particularly at risk of difficulty accessing information and participation in land acquisition and grievance mechanisms; 	<ul style="list-style-type: none"> The participation of this stakeholder group is expected to be achieved as part of the broader community; Due to the different magnitude of impact experienced by this group, this stakeholder group should be specifically consulted to ensure adequate conditions are met in resettlement planning activities. 	<ul style="list-style-type: none"> Priority in economic benefits and development opportunities created by the Project. <p>The expectations of the elderly couple are given below;</p> <ul style="list-style-type: none"> They demand a container or a pre-fabricated house within the same land next to their existing house as the house is pretty much worn-out

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
	<ul style="list-style-type: none"> There is an old couple living within the borders of the Expropriated land of the Project very close to Sarıyer Portal of the Project. They live in a worn-out house, without any other households nearby. They are informally there as the land did not belong to them before expropriation and their house is also not registered within the national system. 	<ul style="list-style-type: none"> Women and children in these vulnerable groups may be at increased risk of gender-based violence and harassment due to their vulnerability. 		<p>and they are having problems with the heating.</p> <ul style="list-style-type: none"> They request an access road to be provided to them, at the opposite side of the existing access road as the road is dangerous and difficult to use for access. The proposed access road is also within the Project Area.
Local community from project neighbourhoods	<ul style="list-style-type: none"> 13 neighbourhoods within the Project's area of influence that may be affected by/interested in the Project have been identified. These neighbourhoods are listed below: <ul style="list-style-type: none"> Kilyos, Demirciköy, Uskumruköy, Gümüşdere, Zekeriyaköy, Rumeli Kavağı, Maden, Yenimahalle, Merkez (Sarıyer), 	<ul style="list-style-type: none"> Adverse impacts of the Project are associated with land acquisition and economic resettlement during the construction phase, dust, noise, vibration and traffic related impacts. During the construction phase, adverse impacts related to access and mobility for local communities may occur, as construction may block roads/access to public areas, damage existing roads/pavements, affect local public elements and create an additional burden on local public services and infrastructure. 	<ul style="list-style-type: none"> Smooth implementation of Project activities will be possible through friendly relations with the community in the immediate vicinity. 	<ul style="list-style-type: none"> Proper management of impacts arising from the Project and prior notification of Project-related activities that may affect this group, Employment and service opportunities in the Project, Good management of health and safety aspects in the working environment, A functioning and well shared Grievance management system.

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
	<ul style="list-style-type: none"> Kocataş, Büyükdere, Kazım Karabekir Paşa, Çayırbaşı Odayeri 	<ul style="list-style-type: none"> There will be an influx of labour into the Project area, potentially leading to local disturbance, gender-based violence and harassment risk issues, and health risks for communities. During the operational phase, noise and pollution impacts may also occur in settlements close to the tunnel entrance and exit due to traffic movement. On the positive side, the Project will create short-term employment opportunities for local residents in some neighbourhoods, particularly during the construction phase. 		
Sensitive receptors and users such as schools, mosques, parks used by children and the elderly.	<ul style="list-style-type: none"> There are schools, mosques, parks, residential buildings and other public facilities in the immediate vicinity of the Project. 	<ul style="list-style-type: none"> The general nature of these receptors is considered to be sensitive because they are surrounded by children, elderly people and vulnerable households; This group may be affected more than others due to the presence of dust, noise, vibration and increased traffic movement. 	<ul style="list-style-type: none"> This group has no particular impact on the Project because it is part of the wider community. 	<ul style="list-style-type: none"> No disturbance in terms of noise, dust and other constituents that may affect the health and safety of this group; Proper traffic management of Project vehicles.
Mukhtars of the neighbourhoods through which the Project passes.	<ul style="list-style-type: none"> This stakeholder group consists of 13 neighbourhood mukhtars. 	<ul style="list-style-type: none"> The Project impact on this stakeholder group is significant because Muhtars are the official management authorities in the neighbourhoods. 	<ul style="list-style-type: none"> This group is the primary point of contact for communication with the neighbourhood and Project-affected households; This group's consent to and understanding of the Project will be 	<ul style="list-style-type: none"> Participation of this group in decision-making for the Project, particularly in relation to the land acquisition and resettlement process;

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
			useful in planning information sharing activities.	<ul style="list-style-type: none"> Participation in the formulation and implementation of community development and activities for the Project; Adequate disclosure of Project information in terms of timelines of key activities and their potential impacts.
State, central and local Regulatory Authorities (including local municipalities and Istanbul Metropolitan Municipality (IBB))	<ul style="list-style-type: none"> This stakeholder group consists of regulatory authorities at country, provincial and district/local level; The roles of each key department are detailed in Table 2. These authorities influence the Project in terms of setting policy, issuing permits and approvals for the Project, and monitoring and enforcing compliance with applicable rules and regulations. 	<ul style="list-style-type: none"> Regulatory Authorities' main concern for the Project is compliance with all applicable guidelines, policies and laws; on the other hand the Project has limited impact on this group. 	<ul style="list-style-type: none"> The Project's ability to comply with various applicable rules and regulations may play a role in the timely implementation of the Project. 	<ul style="list-style-type: none"> Compliance of the Project with regulatory requirements; Timely sharing of information and updates throughout the life of the Project; This stakeholder group is vital for the various permits/authorisations required to commission the Project.
Primary Stakeholders (internal)				
Contractors, subcontractors and suppliers	<ul style="list-style-type: none"> This stakeholder group consists of contractors, subcontractors and suppliers who will 	<ul style="list-style-type: none"> The project provides this group with contractor-shipping opportunities and a steady income stream 	<ul style="list-style-type: none"> This stakeholder group is vital for the smooth operation and timely implementation of the Project; 	<ul style="list-style-type: none"> Continued economic opportunities and job creation;

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
	participate in the Project for various tasks.		<ul style="list-style-type: none"> This group may also play an important role in shaping public opinion regarding the Project. 	<ul style="list-style-type: none"> Clarity regarding the scope of work, expectations, key performance indicators, responsibilities and timelines for the project; Sharing information in a timely and sufficient manner to ensure that project activities can be carried out; Fair employment opportunities and contract closure; Execution of Project activities in accordance with the terms of the contract and existing applicable regulations.
Potential labourers to be engaged for the construction phase of the Project	<ul style="list-style-type: none"> This Group consists of skilled and semi-skilled labourers who will participate in the Project on a contractual basis; The labourers may be local, regional or migrant (from other regions) workers and are likely to consist of skilled workers as well as a range of semi-skilled or unskilled workers. Employment will be provided according to the contractors' own labour requirements; 	<ul style="list-style-type: none"> The influx of labour from other areas to the Project may lead to local discomfort, health problems or an increase in infectious diseases, risks of gender-based violence and harassment, and an additional burden on local services and public utilities; There is a possibility of community resentment if most of the workers/labourers are not from the local area but from other regions; Positive impacts include employment opportunities for 	<ul style="list-style-type: none"> This stakeholder group will be vital for the smooth operation and timely implementation of the Project; In the case of using local labour, this will help to build goodwill on a local scale and opportunities associated with the Project will be shared with the local community; This group can also play an important role in building public opinion associated with the Project. 	<ul style="list-style-type: none"> Concerns related to salaries, benefits, working hours and working conditions, etc; Health and safety during the construction phase Working hours on a construction site Timely distribution of salaries; Provision of appropriate accommodation; Access to the Grievance Redress Mechanism

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
	<ul style="list-style-type: none"> The division between skilled and unskilled labour does not currently exist, so the number of workers to be recruited from local areas is not clear; This influx of labour can have both positive and negative impacts on communities; Labour issues involve all contractors and subcontractors. A large number of subcontractors are expected at different times/phases of the Project. Employment figures for the operational phase are not yet available. 	<p>local communities, purchases from local businesses such as food, groceries and household needs, accommodation and transport services;</p> <ul style="list-style-type: none"> However, temporary employment of local people as labourers can also create risks such as access and frustration issues, as well as risks around redundancy issues if not managed well, with details and duration of participation clearly communicated at the time of engagement and can damage relationships with host communities. 		(GRM) established for the project;
Secondary Stakeholders				
Civil Society/ Local and National NGOs	<ul style="list-style-type: none"> This stakeholder group consists of international, national and local level NGOs that may be active in the region and may have specific views on the Project; Project-related information sharing and participation may include elements linked to land acquisition, 	<ul style="list-style-type: none"> The level of impact of the Project on this stakeholder group is limited because the Project does not affect the functioning of this group. 	<ul style="list-style-type: none"> The stakeholder group can also play an important role in building public opinion in relation to the Project; This stakeholder group may also participate in the implementation of community development plans. 	<ul style="list-style-type: none"> The main expectations and concerns of the stakeholder group from the Project are likely to include Project development, compliance with applicable regulations, and minimal impacts on local communities and contributing to the

Relevant Stakeholders	Profile/Status	Impact of the Project on this Stakeholder Group	Stakeholder Group's Impact on the Project	Stakeholders' Expectations, Discussions, Important Concerns
	compensation and resettlement issues.			<p>overall development of the area;</p> <ul style="list-style-type: none"> The interest of this stakeholder group is primarily related to Project roles in the implementation of community development activities in the area; Timely disclosure of Project-related information.
Labour Unions	<ul style="list-style-type: none"> Labour organisations focusing on the rights of construction workers. 	<ul style="list-style-type: none"> Affects Project workers' contacts with trade unions in terms of labour rights. 	<ul style="list-style-type: none"> May affect the Project both directly and indirectly through consultations with workers and possible strikes. 	<ul style="list-style-type: none"> They may have specific concerns related to working conditions and labour rights, such as wages, overtime, right to join a union, right to strike, living conditions of workers, occupational health and safety issues.
Media	<ul style="list-style-type: none"> Both positive and negative news were identified in their media articles about the project. 	<ul style="list-style-type: none"> The media may be used to provide updates on the Project. 	<ul style="list-style-type: none"> The media can directly and indirectly influence the Project through publications and submissions. 	<ul style="list-style-type: none"> Regular press releases will announce updated information on the Project.

4.0 STAKEHOLDER ENGAGEMENT ACTIVITIES

This section summarises the stakeholder engagement activities that have already taken place.

4.1 KEY STAKEHOLDER ENGAGEMENTS IN THE PAST

In order to inform key stakeholders about the Project and gather their feedback during the scoping, stakeholder engagement and early construction/construction phases, EPC Contractor and Infratech have held various meetings and discussions. Details of these past engagements with the various stakeholders contacted and engaged are summarised in Table 4 below.



Table 4 Details of Past Stakeholder Engagements

Stakeholders	by whom it is carried out	Interview Subjects	Month/Year	Participation Method
Muhtars of the affected settlements	<ul style="list-style-type: none"> • Project Company • Infratech 	<ul style="list-style-type: none"> • Sharing information about the Project, including the history of the Project; • Details of land (temporary and permanent) identified for the Project and the acquisition process and timelines and rights under the law; • Resettlement and land acquisition process; • Understanding the socio-economic profile of landowners and details of income generated; • Information on the Grievance Mechanism; • General discussions to understand expectations from the Project. 	<p>November 2022</p> <p>December 2022</p> <p>November 2023</p>	<ul style="list-style-type: none"> • Face-to-face meetings; • Telephone contact in case the stakeholder planned to be interviewed is located in a different city or refuses to be interviewed face-to-face; • Community-level surveys with mukhtars of affected settlements.
Affected commercial businesses	<ul style="list-style-type: none"> • ICA • Infratech 	<ul style="list-style-type: none"> • Sharing information about the Project, including the history of the Project; • Details of land (temporary and permanent) identified for the Project and the acquisition process and timelines and rights under the law; • Resettlement and land acquisition process; 	<p>November 2023</p>	<ul style="list-style-type: none"> • Face-to-face interviews; • Interviews with the affected enterprise (including affected factories).

Stakeholders	by whom it is carried out	Interview Subjects	Month/Year	Participation Method
		<ul style="list-style-type: none"> • Understanding the socio-economic profile of landowners and details of income generated; • Information on the Grievance Mechanism; • General discussions to understand expectations from the Project. 		
Land Owners	Infratech	<ul style="list-style-type: none"> • Sharing information about the Project, including the history of the Project; • Details of land (temporary and permanent) identified for the Project and the acquisition process and timelines and rights under the law; • Resettlement and land acquisition process; • Understanding the socio-economic profile of landowners and details of income generated; • Information on the Grievance Mechanism; • General discussions to understand expectations from the Project. 	November 2023	<ul style="list-style-type: none"> • Face-to-face interviews; • Household level surveys.
Land Users	Infratech	<ul style="list-style-type: none"> • Sharing information about the Project, including the history of the Project; • Details of land (temporary and permanent) identified for the 	November 2023	<ul style="list-style-type: none"> • Face-to-face interviews; • Household level surveys.



Stakeholders	by whom it is carried out	Interview Subjects	Month/Year	Participation Method
		<p>Project and the acquisition process and timelines and rights under the law;</p> <ul style="list-style-type: none"> • Resettlement and land acquisition process; • Understanding the socio-economic profile of landowners and details of income generated; • Information on the Grievance Mechanism; • General discussions to understand expectations from the Project. 		
Regional Directorate of Highways (KGM)	<ul style="list-style-type: none"> • ICA • Infratech 	<ul style="list-style-type: none"> • Within the scope of the preparation of the Resettlement Action Plan, Infratech visited the Regional Directorate of Highways and received information on expropriation. 	November 2023	<ul style="list-style-type: none"> • Face-to-face interviews;



4.2 MAJOR ISSUES RAISED DURING PAST ENGAGEMENTS

Feedback was received from stakeholders during the preparation of the Stakeholder Engagement Plan and Resettlement Action Plan. Key issues are summarised below, and additional information can be found in the sections that follow.

- Access to Project related information
- Local employment and procurement
- Public health and safety
- Impact on utilities and other services
- Benefits for affected communities

Further information will be provided to potentially affected people during ongoing engagement and throughout the information disclosure period. Stakeholder engagement process following SEP implementation will also continue during construction and operation periods of the Project.

4.2.1 Information Sharing and Communication

There are common reactions among Muhtars regarding information sharing and participation. All of the neighbourhood mukhtars interviewed stated that they were informed about the Project.

During the initial interviews, it was observed that all muhtars were already aware of the Project route and had obtained this information from the internet, Project Company officials and municipality statements.

All of the interviewed mukhtars expressed that they would like to be informed more about the Project. The mukhtars of the neighbourhoods of Maden and Uskumruköy emphasised that the preparation of informative brochures about the Project would facilitate explaining the Project to the residents of their neighbourhoods.

4.2.2 Local Employment and Procurement

Some of the mukhtars noted that people in their neighbourhoods would not be interested in temporary jobs, they are more interested in permanent positions. However, some mukhtars also stated that some people in their neighbourhoods would be interested in new job vacancies. It is important to publicise job opportunities more widely and to inform mukhtars. The social team will be in regular contact with people who do not have a job during the employment and with the mukhtars.

4.2.3 Health and Safety

The stakeholders contacted were satisfied with the health and safety measures provided to them regarding the management of construction impacts. Neighbourhood mukhtars stated that they were informed through WhatsApp groups before the blasting works. Some neighbourhood mukhtars stated that residents complained that the first blasting was carried out at night without any information. They stated that they do not have such a problem in the current situation and that they are informed before the blasts. Necessary precautions will be taken for sensitive receptors and neighbourhoods, buildings/residential areas located very close to the construction site. This SEP includes specific measures to avoid and mitigate health and safety impacts of the Project on communities.

4.2.4 Public services, other services, Neighborhood problems



In almost all neighborhoods, no problems were reported regarding public services, especially electricity, gas and water networks, as well as services provided in education, health and sports facilities in the region. However, some neighborhood headmen stated that there is no sewage network in the neighborhood and that the discharge of wastewater into the sea is a significant problem, and this is the only problem mentioned in terms of public services. The biggest problem stated by the majority of muhtars is the lack of zoning plans in some areas, which prevents construction activities on the lands of some local landowners.

4.2.5 General Attitude Towards the Project

It has been observed that host communities and local stakeholders are generally positive about the Project. Interviewed stakeholders stated that the Project will reduce the traffic in the region and that the region needs this Project.



5.0 STAKEHOLDER ENGAGEMENT TOOLS

This section provides information on how to engage and share information with key stakeholders of the Project, as listed in Annex A.

In addition to face-to-face public and focus group meetings, additional online tools for future stakeholder engagement will include virtual meetings, phone conversations, and formal correspondence.

Other alternative methods being considered for future engagement include:

- Email campaigns,
- Sending text messages,
- Traditional Media – Newspapers, Radios etc. communication through,
- Warning signs,
- RAP surveys, etc. research and surveys to obtain feedback on specific topics and
- Social Media.

The Project's website (<http://www.ictas.com.tr/TR/Insaat>) will be the main platform for online interaction with the relevant stakeholders of the Project. The website will provide access to digital versions of relevant documentation as well as general information about the Project, including:

- Project Information,
- Updates on progress and timeline,
- Project's Grievance Mechanism, complaint forms and contact information of key personnel related to the Project,
- Free phone line: 0850 502 71 00 and

Stakeholders will be able to share their feedback and concerns through face-to-face meetings organized by the EPC Contractor, through its website, e-mail address, toll-free phone line, or direct telephone call to designated officials.

A Grievance Form to assist stakeholders in providing feedback and suggestions is provided in Annex B. Additionally, the link to the website, email id and toll-free numbers will also be added in the following documents/channels:

- Project Information Brochure will be distributed to headmen and affected persons,
- Local publications including Newspaper Advertisements.

Project Information Brochures will already be distributed to key stakeholders listed in Annex A and will be available from Mukhtars' Offices as well as on the Project website (<http://www.ictas.com.tr/TR/Insaat>).

6.0 FUTURE STAKEHOLDER ENGAGEMENT PROGRAM

The future stakeholder engagement program will include:

- ▶ including detailed information on information sharing and consultation activities to be carried out with each Stakeholder group listed in Annex A, including where and when they will be held,
- ▶ Stakeholder engagement activities, including interviews with affected landowners and businesses,
- ▶ Participation in the Construction Phase, and
- ▶ Participation in the Operational Phase.

Additional efforts will be made personally, through CLOs or other relevant experts in the EPC Contractor team, to remain in constant contact with NGOs that may play an important role during the implementation of the Project.

6.1 STAKEHOLDER PARTICIPATION DURING CONSTRUCTION PHASE

Regular stakeholder engagement will be conducted during the construction phase to inform stakeholders about the progress of project-related activities. Specific information about the activities to be carried out will be communicated to stakeholders in advance through CLOs.

Stakeholders will be informed of the description and timeline of planned activities, the progress of the work and the work schedule, the approximate number of workers on site, any diversions or transport issues, and the health and safety risks associated with the activities and the planned mitigation measures to appropriately control these risks. Regular updates will be provided to stakeholders to inform them of the development of Project-related activities and any significant changes to Project planning.

During the construction phase, the Project team will keep the communication channel open with stakeholders to allow them to share their feedback and raise concerns regarding the ongoing work. The grievance mechanism will be maintained by EPC Contractor during the construction phase. This complaint mechanism will be reviewed regularly to ensure that public complaints are received and closed appropriately and used for their intended purpose. The EPC Contractor will be responsible for communicating with different stakeholders to inform them about construction activities and obtain their feedback or concerns.

The EPC Contractor will have the obligation to sign land entry and exit protocols with the PAPs before starting the works and after the works are completed to ensure that no problems are left behind.

The SEP will be updated annually according to the needs of the project.

6.2 STAKEHOLDER ENGAGEMENT DURING OPERATION PHASE

The Project is committed to ongoing engagement with stakeholders throughout the life of the Project. The plans and activities that will be implemented in subsequent phases of Project planning, development and operation will therefore add to the ongoing stakeholder engagement as the Project moves through these phases and will be used to inform activities so that a two-way dialogue is maintained with all parties positively or negatively affected by the proposed Project.

The aim is to ensure that the Project remains in contact with all interested parties and recognises their concerns and ensures that these are addressed in an effective and timely manner.



Ongoing engagement activities will include the following:

- Progress updates on project activities, programming and monitoring,
- Changes to the project description or project activities (if any),
- Updates on recruitment/purchasing opportunities and processes,
- Updates on grievance registrations and resolutions,
- Involvement of workers' representatives starts from the recruitment of workers/employees and continues throughout the life of the project, with bi-weekly meetings with Workers' Representatives,
- Continuous communication flow and reporting between the Project Company and subcontractors.

6.3 FUTURE STAKEHOLDER ENGAGEMENT ACTIVITY PLAN

The EPC Contractor is responsible for communicating with different stakeholders during the construction phase to inform them about its activities and receive their feedback or concerns. The EPC Contractor is also required to keep the Project company informed on the information received and stakeholder engagement activities. In parallel, ICA İtař Altyapı Yavuz Sultan Selim Kprs ve Kuzey evre Otoyolu Yatırım ve İřletme A.ř. (ICA or the "Project Company") will be responsible for informing about the activities related to the operation of the tunnel during the operation phase and communicating with different stakeholders to receive feedback or concerns.

Regular interactions with various stakeholder groups will be guided by the Stakeholder Engagement Activity Plan detailed in the Table 5. The CLOs of the EPC Contractor will be responsible for maintaining interaction records with stakeholders' details for all meetings held during the project.

Table 5 Stakeholder Engagement Activity Plan

Stakeholder	Information to be Disclosed/Negotiated	Participation Methods and Tools	Location	Timetable	Frequency	Responsibility
General Directorate of Highways (KGM)	<ul style="list-style-type: none"> To exchange information and build understanding and consensus on the implementation of the RAP To establish implementation responsibilities and coordination mechanism for the implementation of RAP. 	<ul style="list-style-type: none"> By means of electronic and/or hard copies (in the format requested by the administration) Face-to-face interviews RAP (Turkish) Submission of key RAP findings (in the format requested by the administration) 	<ul style="list-style-type: none"> KGM (Ankara) The central offices of the Project Company. Project website 	<p>Before Land Acquisition (including Information Process)</p> <p>During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)</p>	<p>More than once prior to information sharing when necessary</p> <p>Monthly</p>	<ul style="list-style-type: none"> Project Senior Management Project Company Assistant General Manager Project Company HSES Director
KGM 1 st Regional Directorate	<ul style="list-style-type: none"> To exchange information and build understanding and consensus on the implementation of the RAP To establish implementation responsibilities and coordination mechanism for the implementation of RAP. 	<ul style="list-style-type: none"> By means of electronic and/or hard copies (in the format requested by the administration) Face-to-face interviews RAP (Turkish) Submission of key RAP findings (in the format requested by the administration) 	<ul style="list-style-type: none"> KGM 1st Regional Directorate (Istanbul) Project field offices 	<p>Before Land Acquisition (including Information Process)</p> <p>During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)</p>	<p>More than once prior to information sharing when necessary</p> <p>Weekly</p>	<ul style="list-style-type: none"> Project Senior Management Project Company Assistant General Manager Project Company Social Manager Project Company Expropriation Supervisor
Mukhtars	<ul style="list-style-type: none"> Informing PAPs about the Project, construction programme, land entry processes, RAP study and Project grievance mechanism through mukhtars To ensure that the expropriated lands are evacuated in a timely manner and that the Project proceeds in accordance with the planned schedule 	<ul style="list-style-type: none"> Through electronic and/or hard copies distributed to mukhtars' offices and other public places deemed appropriate Face-to-face interviews in 4 settlements affected by land acquisition RAP (Turkish) Expropriation lists 	<ul style="list-style-type: none"> Project website Project field offices Mukhtars or other mutually agreed locations in 4 settlements affected by land acquisition 	<p>Before Land Acquisition (including Information Process)</p> <p>During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)</p>	<p>At least one meeting before information sharing and one meeting before land notifications</p> <p>Monthly</p>	<ul style="list-style-type: none"> Project Company Social Manager Project Company Deputy Social Manager Project Company Project Company Expropriation Chief Project CLO
<p>Owners/shareholders of lands and assets subject to expropriation by KGM (including heirs of parcels)</p> <p>(Note: This group may include physically and economically displaced PAPs, as well as women and vulnerable persons covered in separate rows below)</p>	<ul style="list-style-type: none"> Support KGM in the land acquisition process and ensure that there is sufficient identification and information on PAPs (including the heirs of the parcels), increase participation in settlement meetings between KGM and PAPs and increase settlement (agreement as per Article 8) and reduce the number of court proceedings (as per Article 27 followed by Article 10) 	<ul style="list-style-type: none"> Face-to-face interviews with owners/shareholders (including heirs of parcels) living in the affected settlements and Istanbul, or telephone calls with owners/shareholders (including heirs of parcels) living outside Istanbul or Turkey Through digital and/or printed materials distributed directly to PAPs Sending official invitation letters to owners/shareholders by KGM 	<ul style="list-style-type: none"> Mukhtars' offices and public spaces in 4 neighbourhoods (e.g. coffee houses, tea gardens, other places where consensus was reached) 	<p>Before Land Acquisition (including Information Process)</p> <p>During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)</p>	<p>All heirs will be identified and invited for interview and will be supported from the RAP Fund during the expropriation process.</p> <p>Regular meetings with PAPs at each stage of the RAP implementation process.</p> <p>In case of dispute, Article 27 is for once only before the filing of court cases and other meetings, and</p>	<ul style="list-style-type: none"> Project Company Social Manager Project Company Deputy Social Manager Project Company Expropriation Supervisor Project CLO

Stakeholder	Information to be Disclosed/Negotiated	Participation Methods and Tools	Location	Timetable	Frequency	Responsibility
					at the times when court decisions are executed and land seizure values and final expropriation amounts are deposited into the Bank accounts of PAPs.	
Households affected by physical displacement (PAPs)	<ul style="list-style-type: none"> To inform PAPs about the Project, construction programme, land entry processes, RAP study and Project grievance mechanism 	<ul style="list-style-type: none"> Face-to-face interviews with households to be physically displaced (telephone call in case of unavailability) Through digital and/or printed materials distributed directly to PAPs 	<ul style="list-style-type: none"> Mutually agreed upon locations 	Before Land Acquisition (including Information Process)	At least once with each PAP during the Information Period or before the commencement of land acquisition	<ul style="list-style-type: none"> Project Company Social Manager Project Company Deputy Social Manager Project Company Expropriation Supervisor Project CLO
				During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)	Weekly monitoring visits during the Resettlement phase, then monthly until settlement.	
Households affected by economic displacement (PAPs)	<ul style="list-style-type: none"> To inform PAPs about the Project, construction programme, land entry processes, RAP study and Project grievance mechanism 	<ul style="list-style-type: none"> Public information meetings in 4 settlements Face-to-face interviews with economically displaced PAPs (telephone call in case of unavailability) Through digital and/or printed materials distributed directly to PAPs 	<ul style="list-style-type: none"> Mukhtars' offices and public spaces in 4 neighbourhoods (e.g. coffee houses, tea gardens, other places where consensus was reached) Project website Project field offices 	Before Land Acquisition (including Information Process)	At least once with each PAP during the Information Period or before the commencement of land acquisition	<ul style="list-style-type: none"> Project Company Social Manager Project Company Deputy Social Manager Project Company Expropriation Supervisor Project CLO
				During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)	Weekly monitoring visits during the Resettlement phase, then monthly until settlement.	
Vulnerable PAPs (households with vulnerable members) Women Affected by the Project Elderly couple living in a house near south portal of the Tunnel	<ul style="list-style-type: none"> Informing and engaging vulnerable PAPs and women about the Project, construction programme, land entry processes, RAP study and Project grievance mechanism 	<ul style="list-style-type: none"> Face-to-face interviews Individual meetings with physically displaced households with vulnerable and female members 	<ul style="list-style-type: none"> Houses or other mutually agreed places where PAPs live 	Before Land Acquisition (including Information Process)	At least once with each PAP during the Information Period or before the commencement of land acquisition	<ul style="list-style-type: none"> Project Company Social Manager Project Company Deputy Social Manager Project Company Expropriation Supervisor Project CLO
				During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)	Once a week	
Affected Businesses	<ul style="list-style-type: none"> Inform affected businesses (employers and direct/contracted employees) about the Project, construction programme, land entry 	<ul style="list-style-type: none"> Through digital and/or printed materials distributed directly to PAPs 	<ul style="list-style-type: none"> Own locations of affected businesses or 	Before Land Acquisition (including Information Process)	At least once with each PAP during the Information Period or before the	<ul style="list-style-type: none"> Project Company Social Manager

Stakeholder	Information to be Disclosed/Negotiated	Participation Methods and Tools	Location	Timetable	Frequency	Responsibility
	processes, RAP study and Project grievance mechanism	<ul style="list-style-type: none"> Face-to-face interviews 	other mutually agreed locations		commencement of land acquisition	<ul style="list-style-type: none"> Project Company Deputy Social Manager Project Company Expropriation Supervisor Project CLO Project Company Business Development Specialist
				During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)	Weekly monitoring visits during the Resettlement phase, then monthly until settlement.	
Credit Institutions	<ul style="list-style-type: none"> Informing/updating the Credit Institutions about the RAP and the progress of the Project 	<ul style="list-style-type: none"> Reports Face-to-face interviews E-mail correspondence Telephone calls Reporting to Credit Institutions on an annual basis E&S Monitoring Reports at regular intervals during construction and operation 	<ul style="list-style-type: none"> Project website Project field offices Other locations deemed appropriate Virtual 	Before Land Acquisition (including Information Process)	Meetings held weekly and upon request	<ul style="list-style-type: none"> Senior Management Team Project Company HSES Director Project Company Social Manager
				During Land Acquisition and Post-Resettlement Phases (including RAP Implementation Period)	Monitoring visits to be carried out by the consultants of the credit institutions in accordance with the ESAP. Monitoring visits by the External Independent RAP Monitoring Consultant and Internal RAP Monitoring Consultant	
Contractors and subcontractors	<ul style="list-style-type: none"> Dissemination of information, including information on labour laws, local employment opportunities, safety measures and grievance handling 	<ul style="list-style-type: none"> Meetings and monthly reporting during the operational phase; Documentation as agreed in the contract 	<ul style="list-style-type: none"> Not applicable 	Construction Phase	Daily and weekly communications with contractors and subcontractors	<ul style="list-style-type: none"> Project Company EPC Contractor
Potential labourers to be engaged for the construction phase of the Project	<ul style="list-style-type: none"> Announcement of project-related vacancies at neighbourhood level; Initiation of a Code of Conduct and Grievance Redress Mechanism (GRM) 	<ul style="list-style-type: none"> Internet address Distribution of flyers and brochures Local media organs and newspaper advertisements Advertising hoardings in public places Through face-to-face interviews during the recruitment process for the construction phase 	<ul style="list-style-type: none"> Not applicable 	Construction Phase	Weekly communication with workers Worker interviews held quarterly as part of labour inspection	<ul style="list-style-type: none"> Project Company EPC Contractor
National and provincial regulatory authorities	<ul style="list-style-type: none"> Information and documents related to necessary permits and applications 	<ul style="list-style-type: none"> Correspondence and official correspondence 	<ul style="list-style-type: none"> Not applicable 	Public Informing Construction Phase	Regular liaison with the relevant	<ul style="list-style-type: none"> Project Company EPC Contractor

Stakeholder	Information to be Disclosed/Negotiated	Participation Methods and Tools	Location	Timetable	Frequency	Responsibility
	<ul style="list-style-type: none"> General Project information 	<ul style="list-style-type: none"> Provision of other information sharing documents for information Meetings 			authorities on matters related to permits and coordination of project work	
District Level Administrations and Local Public Organisations	<ul style="list-style-type: none"> Information and documents related to necessary permits and applications General Project information Employment opportunities 	<ul style="list-style-type: none"> Correspondence and official correspondence Provision of other information sharing documents for information Meetings Distributing flyers, brochures and posters in offices Recruitment notifications in İşkur systems in the district 	<ul style="list-style-type: none"> Not applicable 	Public Informing Construction Phase	Regular liaison with the relevant authorities on matters related to permits and coordination of project work	<ul style="list-style-type: none"> Project Company EPC Contractor
Mukhtars	<ul style="list-style-type: none"> Project-related information (SEP, Project updates, news, visuals) Communicating Public Health and Safety measures, announcements, restriction notices Information on the Complaint Mechanism Employment and purchasing opportunities Information specific to land acquisition and resettlement Discussing activities related to public participation or development 	<ul style="list-style-type: none"> Distribution of flyers and brochures and posters for offices Articles on public health and safety, traffic management, specialised information on employment and purchasing opportunities Face-to-face interviews WhatsApp groups for continuous communication Sending e-mails and text messages Surveys on RAP development, including online survey tools Brochures on the process, rights and complaints to be sent to property owners/right holders Grievance forms (online, in boxes at designated locations, in Project vehicles), telephone hotlines. 	<ul style="list-style-type: none"> Mukhtars' Offices 	Construction Phase Operation Phase	Monthly and specially at the request of mukhtars	<ul style="list-style-type: none"> Project Company EPC Contractor
Civil Society/Local NGOs	<ul style="list-style-type: none"> Project-related information (SEP, Project updates, news, visuals) Information on the Grievance Mechanism 	<ul style="list-style-type: none"> Internet address Distribution of flyers and brochures Grievance forms (online, in boxes at designated locations, in Project vehicles), telephone hotlines Meetings 	<ul style="list-style-type: none"> Locations deemed appropriate 	Construction Phase Operation Phase	Quarterly and specially at the request of NGOs	<ul style="list-style-type: none"> Project Company EPC Contractor
Chambers, business associations as well as co-operatives and unions	<ul style="list-style-type: none"> Project-related information (SEP, Project updates, news, visuals) Information on OHS, restrictions 	<ul style="list-style-type: none"> Internet address Distribution/posting of flyers and brochures 	<ul style="list-style-type: none"> Not applicable 	Construction Phase Operation Phase	Quarterly and specially on request	<ul style="list-style-type: none"> Project Company EPC Contractor

Stakeholder	Information to be Disclosed/Negotiated	Participation Methods and Tools	Location	Timetable	Frequency	Responsibility
	<ul style="list-style-type: none"> • Employment and Procurement and Service provision opportunities • Grievance Management 	<ul style="list-style-type: none"> • Information on health and safety, traffic management and other impact control measures as well as employment opportunities. • E-mailing and online meeting tools • Grievance forms (online, in boxes at designated locations, in Project vehicles), telephone hotlines. • Meetings 				
Local Press Organisations	<ul style="list-style-type: none"> • Project Information, including health and safety, information on constraints, Employment and Procurement and Service provision opportunities, which must be communicated to the local community 	<ul style="list-style-type: none"> • Official Correspondence 	<ul style="list-style-type: none"> • Not applicable 	Construction Phase Operation Phase	Once during information sharing and as required during the construction phase	<ul style="list-style-type: none"> • Project Company • EPC Contractor
People Affected by the Project due to blasting	<ul style="list-style-type: none"> • Blasting will be conducted according to a consistent timetable agreed with potentially affected stakeholders. If changes are made to the blasting timetable, nearby communities will be informed of these changes immediately. 	<ul style="list-style-type: none"> • Meetings 	<ul style="list-style-type: none"> • Neighbourhood Cafes • Mukhtars' Offices • Schools 	Before blasting	Once before blasting activities and at least once after blasting to ensure that no problems are encountered	<ul style="list-style-type: none"> • Project Company • EPC Contractor
People Affected by the Project due to construction related hazards	<ul style="list-style-type: none"> • Public awareness training about trespassing on grounds, the meaning of signs, the risks of playing on or near equipment or entering fenced areas. 	<ul style="list-style-type: none"> • Meetings • Distribution/posting of flyers and brochures 	<ul style="list-style-type: none"> • Neighbourhood Cafes • Mukhtars' Offices • Schools 	Pre-construction	Weekly meetings during construction	<ul style="list-style-type: none"> • Project Company • EPC Contractor



7.0 GRIEVANCE MECHANISM

7.1 INTRODUCTION

Any complaint or comment (including questions/suggestions) about the way a project is implemented is considered a grievance. During the course of the Project, various conflicts, allegations and dissatisfaction with Project-related activities may arise, which may be raised by stakeholders.

Grievance management is an important component of any Project implementation and is guided by a good Grievance Mechanism (GRM), the communication of this Grievance Mechanism and its provisions to key stakeholders, mechanisms for recording, tracking and monitoring incoming grievances, and the roles and responsibilities established in connection with the implementation of this system.

The Grievance Mechanism may need to include an appeal mechanism that is triggered if the complainant is not satisfied with the resolution of the complaint. More detailed information on the appeal mechanism can be found in Section 8.4.1 below.

The EPC Contractor will establish the Project Specific Grievance Mechanism, which will include the following key components:

- Consideration of grievances from both external⁶ and internal⁷ stakeholders,
- Consideration of an appeal mechanism in case grievances cannot be resolved through the project level grievance mechanism, including senior managers of Lenders/Corporate representatives, local authorities and subject matter experts. If necessary, mediators/facilitators will be hired to resolve the issue,
- Integration of specific provisions to manage grievances linked to Gender Based Violence and Harassment (e.g. separate channel for related grievances),
- Establish timeframes for acknowledgement of receipt and subsequent resolution of complaints, and
- Review and resolution of complaints, including resources and organisational arrangements, practical arrangements for protecting confidentiality and taking measures to avoid any retaliation against complainants.

7.2 PRINCIPLES

The Project-specific Grievance Mechanism will be developed with the following objectives:

- To address concerns promptly and effectively, in a transparent manner that is culturally appropriate, free from manipulation, interference, coercion, intimidation and penalisation, and easily accessible to all affected parties free of charge,
- Ensure that complaints are handled in a culturally appropriate manner and in a manner that is discreet, objective, sensitive and ready to respond to the needs and concerns of stakeholders; and

⁶ External stakeholders consist of neighbouring communities, households affected by the Project due to land acquisition (PEHs) and other interested parties that may be affected by Project activities.

⁷ Internal stakeholders consist of employees and labourers, contractors and subcontractors engaged by the Project for Project-related activities.



- The mechanism will not block access to judicial or administrative remedies. The key components of the grievance resolution mechanism that help to promote the principles of Grievance Management are:
- Timely response to grievances,
- proportionate to Project risks and potential negative impacts,
- A transparent demeanour that is culturally appropriate, prudent and sensitive to stakeholder needs and concerns,
- Free from manipulation, interference, pressure, threats and retaliation,
- Easily accessible at no cost,
- Does not impede access to judicial or administrative remedy,
- Stakeholders are informed about the grievance mechanism,
- Reporting on the implementation of the Grievance Mechanism,
- Protect the confidentiality of affected individuals,
- Allowing anonymous complaints,
- Providing mediation for grievance resolution in case of significant community concerns,
- Monitoring and analysing trends, and
- An appeal mechanism at project level may be required if the Project's proposed solution is not accepted by the complainants.

7.3 CORPORATE STRUCTURE

The Grievance Mechanism will generally be managed on a daily basis by the Community Liaison Officer (CLOs), who will report directly to the E&S Manager. EPC Contractor will integrate the terms of the Grievance Mechanism into Contracts, Subcontracts and Supplier Agreements to ensure that the Grievance Mechanism is consistently implemented with sufficient resources in line with the Project's requirements.

A Grievance Committee (GC) will be established at Project level to oversee the implementation of the Grievance Mechanism. The primary responsibility of this committee is to regularly review the grievances of internal and external stakeholders. The Grievance Committee will review the responses shared with external stakeholders in order to resolve non-judicial disputes arising from various Project-related issues. The Grievance Committee will be guided internally by the Project team and the committee will include representatives from the following teams for grievance resolution:

- Senior Management
- Social Manager
- Construction Supervisor/Project Manager
- Senior Social Specialist
- Resettlement Specialist and
- Public Relations Officers

The Grievance Committee will be chaired by the Project Company. There will be at least one (preferably more) female members in Senior Management. The presence of women members in the Grievance Committee will ensure that there is a mechanism that is easy to access and responds in a fair and equitable manner to grievances and concerns of all genders that may be affected by



the Project and members of vulnerable groups on the ground, as well as grievances and concerns arising from their vulnerabilities related to gender-based violence and harassment.

In special cases that require the involvement of another relevant person with decision-making authority in relation to the complaint or complainant, the Committee may include members from local Government authorities (e.g. Mukhtars, land experts).

Grievances received from external government agencies or other institutional stakeholders such as Istanbul Metropolitan Municipality or other similar organisations will also be addressed using this mechanism.

In cases where issues are too complex to be resolved at Project level or Grievance Committee level, the decision to involve legal team of the Project Company will be made by Senior Management.

If the grievances received by KGM through CIMER and official letters are construction related, they will be submitted to the Project Company for review and action. Project Company will review the content of the Complaint and if necessary, contact the complainant for further information. Depending on the assessment, EPC Contractor will take action and inform both the complainant and KGM as appropriate. In case the complaint exceeds EPC Contractor's responsibility, such as land acquisition, major design change requests from competent authorities, etc., KGM will take action and inform the complainant of the outcome.

The Project Company (ICA) and EPC Contractor (IC İÇTAŞ) provides the overall assurance that the RAP is implemented in line with the conditions of the lenders. Although land acquisition and resettlement related grievances submitted to the expropriation department of KGM will be directly recorded and managed by the KGM PIU team, the list of these grievances and the finalisation actions to be taken by KGM will be shared with the Project Company on a weekly basis. The Project Company and EPC Contractor will monitor the effective resolution of these grievances and, if necessary, take action to close any gaps between the national Expropriation Law and practices and the conditions of the lenders. The Project Company will regularly report progress on grievances to the Lenders.

7.4 IMPORTANT STEPS OF THE GRIEVANCE MECHANISM

The following figure describes the Grievance Resolution process developed to ensure effective and timely response to community grievances and to maintain good relations with the community and stakeholders.



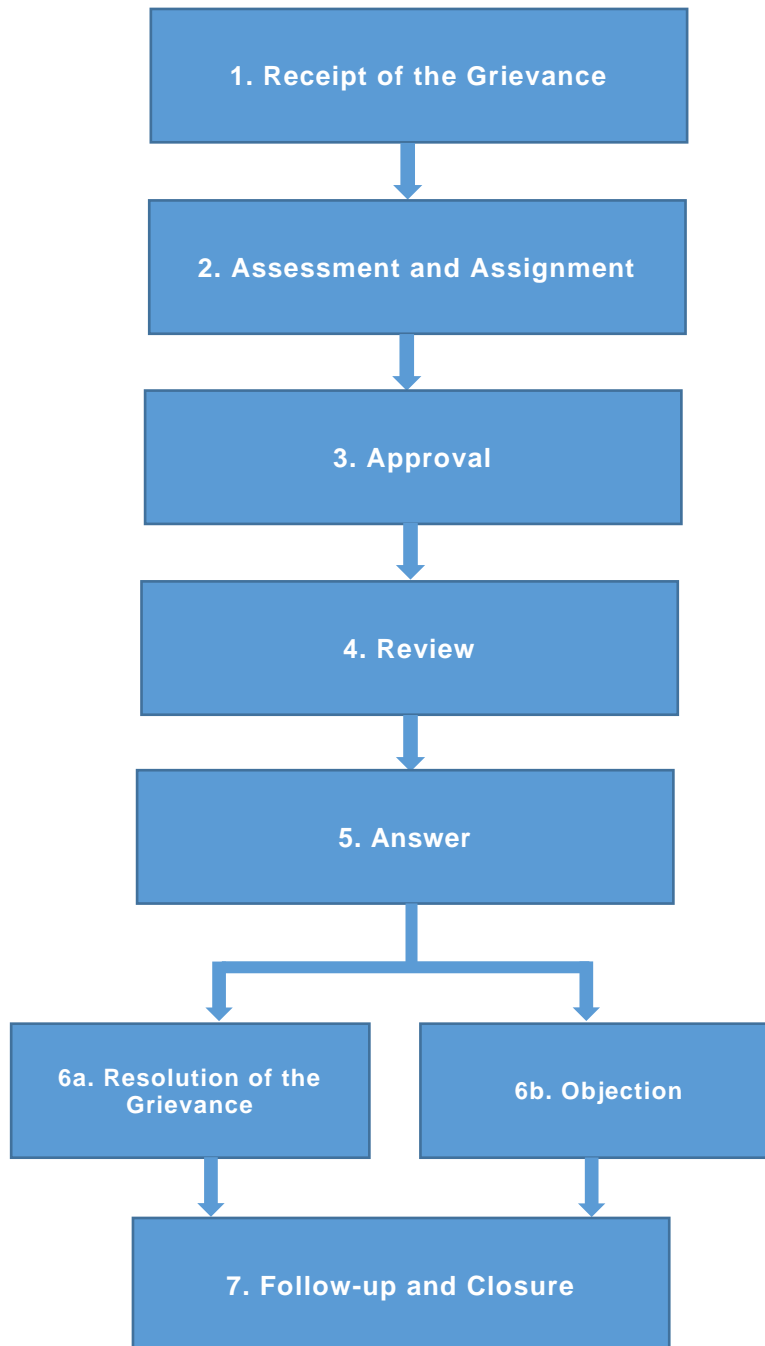


Figure 1 Grievance Resolution Mechanism

7.4.1 Resolution Mechanism for External Grievances

The External Grievance Resolution Mechanism will be documented in detail and will be displayed at relevant locations in the Project office and will be accessible on the Project's website. The key steps associated with the External Grievance Resolution Mechanism are described below.

1. Receipt of the grievance: Grievances may be submitted through various channels including:

- Face-to-face / unscheduled meetings,
- In writing by post to the address shown by the Project,
- Online - via the Project's website and e-mail address,
- via grievance forms to be distributed to affected people during consultation meetings and comment boxes to be placed in community centres; and
- Through a free telephone hotline organised by the Project.

The grievance is categorised by the assigned CLO by recording it in the 'Grievance Register' (hard copy and electronic). Separate Grievance Registers for Internal and External Grievances will be kept at the Project office for easy follow-up.

Complainants may also choose to use national and regional mechanisms, such as

- through the Portal of the Communication Presidency of the Republic of Turkey (CIMER) and toll-free "Alo 150" lines,
- Istanbul Metropolitan Municipality Portal (Beyaz Masa) and toll-free "Alo 153" lines,
- KGM Online Complaint Mechanism (Complaint Notification (kgm.gov.tr)).

2. Assessment and assignment: The CLO defines the timeline of the investigation and follow-up actions. For complaints related to issues where there is already a more appropriate company process in place, the CLO will refer the matter to the appropriate process owner for next steps. This process will generally apply to Grievances related to contractual or commercial matters, industrial relations and labour relations, business integrity or criminal matters, and matters subject to ongoing or pending litigation. CLO will update the Grievance Register when necessary.

3. Within three (3) working days of the submission of the grievance to the Project, the Project will formally acknowledge receipt of the grievance through a one-on-one meeting, telephone call or letter. If the grievance is not well understood or if additional information is required, clarification should be requested from the grievor at this stage.

4. The CLO refers the grievance in writing to the relevant Project unit, contractor or personnel for an appropriate response. The CLO will estimate the subject matter of this grievance and determine the risk category. If necessary, the grievance may be brought to the attention of senior management.

With input from Senior Management and others as required, the dedicated team assigned to the grievance or the CLO will prepare a response. Depending on the complexity of the grievance or if the assessment requires a view on certain issues, the Grievance Committee may be involved in the process.

Necessary actions are taken to deal with the matter and the completion of these actions is recorded in the grievance record. The response is approved by the CLO. This may be a signature on the grievance record or any written or e-mail correspondence with the complainant to indicate agreement, which will be filed with the grievance.

5. The response is communicated to the affected party within 7 working days in case of an easy to resolve grievance. For other grievances where the issues are complex and additional stakeholders such as Senior Management or the Grievance Committee are involved (as suggested in Step 4), the response will be provided within 7 working days of receipt of the grievance. Within 30 working days it will be communicated to the aggrieved party. The CLO ensures that an appropriate approach to communicating the response to the affected party is agreed and, where appropriate, implemented after approval by senior management/Grievance Committee.

The complainant's response to the submitted resolution is recorded to help evaluate whether the complaint should be closed or whether further action is required. CLO will use appropriate communication channels, such as telephone or face-to-face meetings, to confirm whether the complainant understands and is satisfied with the response. Complainants' response will be recorded in the complaint log and ideally both parties will confirm the complaint to confirm that the complaint is closed.

6(a). The complaint is closed with the approval of the CLO, who will determine whether the complaint can be closed or whether further attention and action is required. If further attention is required, the CLO will reassess the complaint and take appropriate action. Once CLO has assessed whether the complaint can be closed, he/she will authorise the closure of the complaint in the complaint record and/or by written communication. This should be done using the complaint closure form, which evidences that a complaint has been addressed, the necessary measures/actions have been taken and the issue has finally been resolved. The complaint closure form is provided in Annex B.

It is not sufficient to close a complaint on a form alone, but other documentary evidence should be attached to the closure form to show the process that has been undertaken and any documentation that proves that the complaint has been resolved. This evidence may include receipts, bank statements, photographs, official letters, decisions of some of the committees that carried out the assessment, etc.

6(b). Appeal system: If the actions taken on a complaint are not resolved to the satisfaction of the complainant, the Grievance Committee (GC), consisting of the following members, will address the matter and initiate an appeal mechanism as necessary.

- Deputy General Manager,
- Social Manager - RAP Fund Implementation Representative,
- Agricultural Development Specialist,
- Business Development Specialist,
- Expropriation Chief,
- Independent Expropriation and Valuation Expert,
- Senior Social Expert,
- Chief Engineer,
- KGM Expropriation Chief,
- 3rd Party Experts according to the nature of the dispute.

In special cases requiring the involvement of another relevant person with decision-making authority in relation to the complaint or the complaining party, the Committee may be assisted by local Government authorities (e.g. Mukhtars, soil experts/agricultural experts from local agricultural directorates) or the nominated members may also be added, such as another senior representative from the Subcontractor. Complaints received from external government agencies or other institutional stakeholders such as Istanbul Metropolitan Municipality or other similar organisations will also be handled using this mechanism.

The Grievance Committee may be notified as an independent mediator depending on the subject/type of grievance where appropriate to ensure that the grievance is resolved to the satisfaction of both parties. These parties may be included in the Project's Grievance Committee on an as-needed basis. The purpose of this mechanism will be to review responses shared with external stakeholders to resolve non-judicial disputes arising from various Project-related issues. ICA will carry out the activities to be proposed by the independent mediator. Stakeholders with this mechanism in place can still resort to external remedies, including judicial remedies in accordance with the current legislation in Turkey. Because the Project Grievance Mechanism will not prevent access to judicial or administrative remedy.

In cases requiring further legal review or involvement of other parties, Senior Management will decide whether or not to involve the Project Company legal team.

7. Follow-up and Closure: A Complaint is closed when no further action can or should be taken on that complaint. CLO is responsible for the logistics of closing the case and updating the Complaint Log. At the end of a case, regardless of whether a settlement has been reached, the CLO will ask the Complainant for feedback on their level of satisfaction with the process and outcome of the complaint handling.

External/National Grievance Mechanism:

Stakeholders are encouraged to use the project level grievance mechanism for a quick and efficient resolution. However, they may also choose to use national and regional mechanisms, which include

- ▶ Communication Presidency of the Presidency of the Republic of Turkey (CIMER) Portal and toll-free "Alo 150" hotlines,
- ▶ via the Istanbul Metropolitan Municipality Portal (White Desk) and toll-free "Alo 153" lines.

Complaints received from external government agencies or other institutional stakeholders such as Istanbul Metropolitan Municipality or other similar organisations will also be handled using this mechanism. The Project team will address all issues raised through national grievance mechanisms and will report these cases and the measures taken to address them to the Project Grievance Tracker.

In cases where issues are too complex to be resolved at Project level or Grievance Committee level, the decision to involve legal team of Project Company will be made by Senior Management. In case there are cases that exceed the authority of the Project Company and are under the responsibility of KGM or other official authorities, these will be shared with the relevant authorities and followed up on a case-by-case basis.

Grievances received by KGM through CIMER and official letters will be submitted to ICA for review and action. ICA will review the content of the grievance and, if necessary, contact the complainant for further information. Depending on the assessment, ICA will take action and inform both the complainant and KGM as appropriate. In case the grievance exceeds the responsibility of ICA such as land acquisition, major design change requests from competent authorities etc., KGM will take action and inform the complainant about the outcome. The list of these grievances and the finalisation actions taken by KGM will be shared with ICA on a weekly basis to ensure that all issues are followed up and reported to the lenders accordingly.

7.4.2 Grievance Resolution Mechanism for Internal Stakeholders

There will be a well-documented Internal GRM for workers, including employees, employees of contractors and their trade unions appointed for the Project. This may be an extension of the ICA's existing GRM at the corporate level, or it may be a Project-specific GRM developed

to respond to grievances of those working on the Project, both on payroll and on contract. As the EPC Contractor is part of a holding company to which the Project company belongs, it is expected that the GRM implementation will have similar characteristics.

The provisions of the GRM for internal stakeholders (employees, labourers, contract workers, etc.) will be documented and displayed at relevant locations in the Project office, and employees and workers are required to be informed about the provisions of the Internal GRM at the time of their engagement/employment with the Project.

EPC Contractor will also require its contractors to establish a grievance mechanism for all its workers by including appropriate clauses in their contracts. ICA will reserve the right to review the records of grievances on a regular basis and to hold discussions with contract labourers at any time.

7.4.3 Gender-based Violence and Harassment within the Scope of Grievance Mechanism

7.4.3.1 Senior Management Commitment

Prohibition of gender-based violence and harassment in the workplace will be the top priority of Project Company's senior management. This priority will be demonstrated by the following policies and procedures to be implemented by Project Company, which include gender-sensitive and human rights-orientated guidance

- Appointing GBVAW focal points and training them to address any potential issues/incidents of GBVAW,
- Inclusion and Non-Discrimination Policies and other Human Resources policies (as appropriate),
- Code of Conduct for Employees and Workers,
- Grievance Mechanism and associated monitoring and reporting. Project Company will establish a grievance mechanism tailored to the needs of different groups (workers and communities), provide secure and confidential channels for reporting on GBVAW, including the ability to submit complaints anonymously, and establish a clear protocol for receiving, recording, investigating and monitoring reports of GBVAW,
- Transparent employment and performance appraisal systems to reduce the potential for gender-based violence and harassment,
- Training and awareness-raising activities for employees and workers to motivate changes in attitudes and behaviour,
- Working with contractors and suppliers to prevent and respond to gender-based violence and harassment,
- Design physical spaces to enhance safety and reduce opportunities for gender-based violence and harassment, and
- The Gender Action Plan contains information on gender-based management actions.

7.4.3.2 Scope of the Complaint Mechanism on Gender-Based Violence and Harassment

The Grievance Mechanism process presented in Section 7.4 will be an inclusive system designed to address all types of grievances. In order to ensure the comfort of victims of gender-based violence and harassment in connection with the Project, the Project will ensure the recruitment of female staff for various roles according to their skills and experience requirements. The HR/HSE Team, including the GBVAW focal points, will be responsible for

liaising with staff, labour and community grievants. This will ensure that Project-related complaints of gender-based violence and harassment are reported in a safe and comfortable environment. The identity of the complainant will be kept as confidential as possible.

When gender-based violence or harassment is reported, the Project Company will respond thoughtfully and carefully, drawing on gender-based violence and harassment, child protection and legal expertise, if necessary, and using only trained investigators to conduct relevant investigations.

All cases of gender-based violence and harassment must be reported to the Bank without disclosing personal information of the victims or perpetrators.

7.4.3.3 Training and Capacity Building

In addition, Project staff and workers (both salaried and contracted) will receive training on all policies and procedures, including those related to gender-based violence and harassment, at Project inception and ongoing. Following this, staff and workers will sign a declaration that they understand the Code of Conduct and have undergone training on gender-based violence and harassment.

In addition, members of the Grievance Committee will be trained on how to register, investigate and respond to complaints of gender-based violence and harassment by gender experts in the sector or NGOs in accordance with the Good Practice Guidance on Gender-Based Violence and Harassment⁸. Key focal points will be selected from trained members (one person representing each gender) to receive and respond to allegations of sexual harassment at work. These focal point staff may request follow-up support from more experienced researchers in complex and/or sensitive cases, and Project Company will make every effort to provide this support/ guidance. In addition, the Project will need to seek external support in assessing the following grievances related to gender-based violence and harassment in cases:

- ▶ involvement of the Project's Senior Management or
- ▶ involvement of members of the public and trust issues related to the Project's assessment and grievance resolution.

7.4.4 Vulnerable Groups under the Grievance Mechanism

The Project will take measures to provide information and assistance to vulnerable groups when it comes to communication and implementation of the Grievance Mechanism. The Grievance Mechanism will be publicised through appropriate channels, public meetings, public announcements, flyers and brochures, and the full range of channels used to raise grievances. In addition, EPC Contractor will ensure that the Grievance Mechanism is also publicised in local languages understood in the Project Area. EPC Contractor will establish a whistleblowing hotline as a first step to enable complainants to lodge complaints anonymously.

In addition, a community information brochure will be circulated in local language providing basic information about the Project, important rights that affected people may not be aware of, CLO contact information and a list of available channels to submit complaints if any wrongdoing is observed (any violation of a code of labour conduct, any harassing behaviour, unacceptable behaviour, etc.) or to seek employment opportunities or other benefits. The brochure should be made accessible to people with literacy problems using simple language.

IFC ⁸ Highlighting Emerging Good Practices on Gender-Based Violence and Harassment for the Private Sector Supported by EBRD and

During the monitoring of the Grievance Mechanism process, particular attention will be paid to the assessment of complaints, whether the resolution is satisfactory and whether it complies with the guidance provided in Section 8.4.1.

7.5 GRIEVANCE MECHANISM COMMUNICATION

The Grievance Mechanism will be documented in detail and will be displayed at relevant locations in the Project office and accessible on the Project's website. In addition, internal stakeholders (employees, labourers, contract workers, etc.) will be informed about the provisions of the Grievance Mechanism by their supervisors when they join or start work in the Project. This process will be supervised by CLO of EPC Contractor.

A simple database will be developed to manage and monitor grievances. The following information will be entered into the database for each complaint received:

- name and contact details of the complainant,
- date and nature of the complaint,
- if appropriate, the name of the technical staff in charge of reporting the complaint,
- follow-up actions taken,
- the proposed resolution of the grievance,
- how and when the relevant Project decisions were communicated to the complainant, and
- if any, whether longer-term management measures have been taken to prevent similar complaints from recurring in the future.

A sample grievance form and database are provided in Annex A and Annex B. The EPC Contractor will consider whether it is appropriate to provide the Grievance Form in other languages due to migrants that may be present at the Project site.

Complaints can be submitted verbally or in writing during the construction phase through the following channels:

- Contact Person: Akarcan Çalışan-Eda Hasanoğlu
- Telephone: 0850 502 71 00 - 0 (530) 914 72 19
- Email Address: akarcan.calisan@mbemetro.com- eda.ozel@ictas.com.tr
- Face to Face: Yavuz Sultan Selim Köprüsü ve Kuzey Çevre Otoyolu İşletmesi Garipçe Mahallesi Rumelifeneri Cad.No: 282 Sarıyer/İstanbul
- Public Grievance Mechanism Paper Form: Stakeholders, including the public, can complete the paper complaint form found in Annex B and submit it to the EPC Contractor offices or forward it via email to "akarcan.calisan@mbemetro.com- eda.ozel@ictas.com.tr"
- Online application: Stakeholders can complete the complaint form online at <http://www.ictas.com.tr/TR/Insaat>.

8.0 MONITORING AND REPORTING

8.1 MONITORING AND EVALUATION

The SEP will be regularly monitored by the EPC Contractor to ensure that engagement with various stakeholders is properly documented through transparent communication channels.

Social Manager of the EPC Contractor will be responsible for the implementation of the SEP together with the Grievance Mechanism during the construction, commissioning, and operation phases of the Project. The Social Manager will coordinate with the CLOs and other relevant team members of the Project and the contractors and subcontractors engaged for the Project on the maintenance and updating of documents related to stakeholder engagement undertaken by these organisations and review of grievance management undertaken by the contractors.

Each E&S monitoring should include the following measures:

- ▶ Number of women-specific meetings,
- ▶ Number of meetings/outreach with vulnerable groups,
- ▶ Number of meetings/interactions with public stakeholders,
- ▶ % of grievances resolved within the specified time frame, and
- ▶ % of grievances that remain open after a given timeframe.

Where many stakeholders raise similar issues, these will be grouped as "Common issue" and responses to them will be tracked together in a separate section of the documents organised for Stakeholder Engagement and Grievances. The response column in the main recording system will have an appropriate cross-reference. EPC Contractor's senior management will be informed of persistent grievances of a similar nature or linked to a similar organisation and a Root Cause analysis may also be initiated at the direction of senior management. Results and lessons learnt will be incorporated into subsequent updates of the SEP as work on the Project progresses. The Management Team of EPC Contractor will conduct an annual review of the SEP and Grievance Mechanism.

8.2 DOCUMENTATION AND REPORTING

This SEP is a living document. The Project's Social Manager, with assistance from the CLOs, is primarily responsible for updating this SEP during the Planning (prior to construction activities), Construction and Operation phases. Updates to the SEP will include newly identified stakeholder groups (if any) and stakeholder engagement activities conducted since the previous update.

After the 60-day information sharing and consultation report at the end of the information sharing period - regular updates on stakeholder engagement activities, issues raised and addressed will be reported in E&S progress update reports/on the Company's website⁹ during construction and operation. SEP implementation will also be reported to lenders as part of E&S reports.

Documented information to be maintained under the requirements of this SEP is listed below:

- ▶ Stakeholder Register,
- ▶ Meeting minutes;

⁹ This may vary for construction and operation phases.

- ▶ List of participants and contact details (unless anonymity is requested);
- ▶ Feedback received from stakeholders and
- ▶ Grievance Database.



9.0 INSTITUTIONAL FRAMEWORK

The Project Company will be responsible for the design, procurement, construction and operation phases of the Project. KGM will manage the land acquisition process in liaison with ICA in accordance with the authorisation set out under national laws.

ICA and EPC Contractor will establish an appropriate organisational structure to oversee and manage the environmental and social risks and impacts associated with the Project, including the appointment of an EHS studies, Occupational Health and Safety and a Health, Safety, Social and Environment (HSSE) Director to manage the social aspects. In addition, Community Liaison Officer (CLOs) will be appointed to manage day-to-day public engagement activities facilitating information sharing, stakeholder engagement, grievance management, etc.

9.1 DUTIES AND RESPONSIBILITIES

The specific responsibilities of the ICA associated with the Project's SEP implementation are provided in the table below.

Table 6 SEP Duties and Responsibilities

	Responsibility/Accountability
Executive Management of Project Company (ICA)	<ul style="list-style-type: none"> Has overall accountability for the Project, including delivery in accordance with applicable national and Lenders' standards. The organisation ensures that adequate resources are allocated for the SEP, including permitting, training, equipment and qualified personnel. Ultimate responsibility for ensuring implementation of the grievance mechanism. Periodically reviews the effectiveness of the implementation of the SEP in accordance with the relevant provisions of the Project requirements.
Social Manager of Project Company (ICA)	<ul style="list-style-type: none"> Manages SEP and grievance mechanism. Manages public relations resources including consultants for the implementation of the social requirements of the Project. Manages labour and working conditions, gender equality, human rights, public safety and security, local procurement and employment issues in accordance with Lenders' standards. Oversees the progress of contractors' activities in accordance with Project and Lenders' requirements. Manages regular liaison with NGOs and other stakeholders. Provides Project-led advice, guidance and assurance on social issues. Liaises with KGM field team regarding land acquisition and compensation. Reports social performance to management, lenders and other relevant parties.

	Responsibility/Accountability
	<ul style="list-style-type: none"> Coordinates CLOs on the implementation of the Grievance Mechanism to follow up on the resolution of grievances, requests and issues raised with third parties. Establishes a grievance redress mechanism programme along the corridor where all grievances (verbal or written) are recorded and forwarded to the responsible authorities, addressed in a timely manner and fed back to the aggrieved parties. It also monitors the performance of the mechanism in accordance with the SEP and provides reports on the mechanism. Prepares quarterly progress and compliance reports for Lenders as well as other external parties. Provide regular input to the auditors and assist external auditors on a quarterly basis to ensure a fair and transparent internal audit. Oversee the implementation of grievance procedures to ensure that records are maintained, necessary follow-ups are made and appropriate corrective actions are taken with satisfactory results.
Project Manager of EPC Contractor	<ul style="list-style-type: none"> Works in coordination and cooperation with EPC's Senior Social Specialist. He/she is responsible for the implementation of the Project activities set out in this SEP. The Project Manager will be appropriately competent and will have internalized good construction practices in line with national law and applicable Lenders' requirements. Responsible for overall SEP and grievance mechanism performance and making human and financial resources available to ensure compliance with the requirements of the Project. Responsible for Employment and Training Management associated with construction activities. Reports to the Deputy General Manager on EHS performance.
Senior Social Specialist of EPC Contractor	<ul style="list-style-type: none"> Acts as the Project-specific SEP and grievance mechanism officer and is responsible for documentation and updates. Engages with relevant NGOs and other stakeholders on a regular basis in accordance with the SEP. Plans stakeholder engagement activities and ensures that they are properly implemented by the CLOs assigned at different sites Manages and oversees CLOs, including consultants for the implementation of SEP and social requirements of the Project. Manages labor and working conditions, gender equality, human rights, public safety and security, local procurement

	Responsibility/Accountability
	<p>and employment issues in accordance with Lenders' standards.</p> <ul style="list-style-type: none"> • Reports social performance to the ICA Social Manager and other relevant parties. • Manages the Grievance Mechanism. • Responsible for monitoring ongoing Stakeholder Engagement and overall stakeholder activities at all levels. • Audits/monitors and regulates the activities of subcontractors to ensure their compliance with the SEP. • Ensures that particularly vulnerable members of affected communities are reached through CLOs. • Ensures that PR Officers report in a timely manner and on expected and agreed upon issues. • Receives feedback from CLOs on social performance and resettlement issues. • Ensures that project staff are informed and trained on SEP. • Ensures that the CLO team reports on time and on expected and agreed issues. • Provides resources to ensure that stakeholders' interests are represented and taken into account. • Manages and organizes complaints and concerns related to OHS or environmental issues. • Maintains oversight and monitoring of resettlement planning and implementation. • Manages and oversees CLOs, including consultants, to implement the social requirements of the Project. • Reports social performance to the ICA Social Manager and other relevant parties. • Provides advice, guidance and assurance to the EPC Contractor's Project management on social issues.
Expropriation Chief (ICA)	<ul style="list-style-type: none"> • Participate in public events. • Explain the land acquisition elements of the Project.
Grievance Committee	<p>The Grievance Committee (GC) is executed internally by the ICA and EPC Project team and chaired by the Executive Manager of the Project Company and has representatives from the following teams:</p> <ul style="list-style-type: none"> • ICA Executive Management; • ICA Social Manager; • Project Manager of EPC Contractor • Senior Social Specialist of EPC Contractor • Resettlement Specialist and

	Responsibility/Accountability
	<ul style="list-style-type: none"> Community Liaison Officer (CLOs). <p>The Committee will have at least one (but preferably more) women members. In special cases that require the involvement of another relevant person with decision-making authority in relation to the complaint or the complaining party, the Committee may also include members from local Government authorities (e.g. Mukhtars).</p> <p>The main responsibilities of the Grievance Committee include:</p> <ul style="list-style-type: none"> Supervision of the implementation of the grievance mechanism; Resolution of grievances; Regular review of grievances raised by internal and external stakeholders; and Review responses shared with external stakeholders to resolve non-judicial disputes arising from various Project-related issues.
Community Liaison Officer (CLOs)	<ul style="list-style-type: none"> Establish and maintain a database of all PAPs (households and formal and informal users of affected lands, with special attention to those with vulnerabilities) with the support of the Chief of Expropriation. Engage PAPs for the implementation of RAP measures and actions. Under the coordination of the RAP Implementation Team Leader and in collaboration with the Expropriation Chief, ensure stakeholder engagement and be responsible for the day-to-day implementation of relevant RAP actions (e.g. grievances, stakeholder information and consultations, etc.) in the field, including the management of grievances related to land acquisition. If received by the Contractor, enters land acquisition related grievances and feedback into a segregated database (separate from other Project grievances not related to land acquisition) (interest to be determined by RAP Implementation Team Leader and/or Expropriation Chief). Lead the day-to-day implementation of the SEP and grievance mechanism, including proactively maintaining regular communication with affected communities through regular community visits, calls or other online engagement to monitor views and provide updates on Project activities, and securing communication with vulnerable groups in accordance with the Project SEP. Support the Social Specialist during the planning and implementation of their tasks. Liaises with legal stakeholders and contacts for Civil society organisations (CSOs).

	Responsibility/Accountability
	<ul style="list-style-type: none"> • Organises institutional agreements with legal stakeholders (e.g. trainings to be received by Project-affected people). • Organises and conducts meetings not at community level. • Available upon request to liaise with the affected population, especially for vulnerable groups. • Supports affected persons on Project-related issues (answers questions about the process, submission of grievances, information on counselling activities, etc.). • Provides Project Affected Persons (PAPs) access to third party legal support if necessary. • Provides counselling on available ways to resolve disputes between landowners in multiple ownership situations. • Provides support within the grievance mechanism, • Ensure a smooth relationship between stakeholders through regular liaison and networking to ensure that Project-affected people are well informed about their rights and responsibilities as set out in national legislation and in particular the associated Stakeholder Engagement Plan and Resettlement Action Plan and other relevant implementation plans; • Arrange and organise meetings with other organisations or individuals as requested, including arranging meeting venues, • Organise special meetings and women-focused activities with women to encourage women's active support for the project during construction and operation, and receive their views and expectations through these meetings • Maintain detailed and accurate records of meetings, including agenda, minutes of meetings, follow-up/action points in relation to other experts. Details of meetings held or cancelled should also be kept, • Prepares or ensures the preparation of documents such as reports, brochures, briefings, notices, etc., and distributes them to all relevant parties. Similarly, it receives documents from both internal and external parties, • Ensures timely and continuous follow-up of document approvals by the relevant authorities and informs the Project Manager when necessary, • Ensures that the communities in the construction sites are informed of project-related developments and that communication channels with these communities remain open, • Provides governance, • Ensures that community concerns are brought to the Project's attention, responds to these concerns, and facilitates issue resolution,



	Responsibility/Accountability
	<ul style="list-style-type: none"> • Acts as a focal point for Project stakeholders in terms of issues, grievances and requests, • Responsible for ensuring that all grievance mechanism registrations are received and routed to the relevant units for resolution and appropriate closure in accordance with the Project SEP • Assists in the identification of potential implementation problems and bottlenecks, • Provides participation support for persons with disabilities in line with the definitions in the Project, in particular the RAP • Reports to the Senior Social Manager on a daily and weekly basis on community issues and the performance of the project in relation to these issues, • Monitors weekly and daily developments in the Project; • Mediates issues between community members and project staff,
	<ul style="list-style-type: none"> • Escalates project-related queries from community leaders and residents to appropriate government departments and the Project Manager, • Creates social media strategy • Develops and maintains value-added marketing tools including marketing literature, newsletters, Facebook page and other external communications • Ensures that web designs using modelling tools are available to publish documents, information and other presented materials and keep them up to date during any meeting with the community • Ensures that trainings are well prepared and organised in accordance with project requirements and policies • Carries out other activities that may be assigned.

9.2 BUDGET ALLOCATION

ICA will ensure that appropriate budget and resource allocations are made for activities related to stakeholder engagement, such as meetings, trainings, etc., where needs are identified through the stakeholder engagement process and deemed reasonable.

STAKEHOLDER ENGAGEMENT PLAN (SEP)

ANNEXES

ANNEX A: List of Key Stakeholders

ANNEX B: Grievance Form / Grievance Closure Form

ANNEX C: Grievance Database



ANNEX A
List of Key Stakeholders



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
Administrations	Ministry of Transport and Infrastructure	<ul style="list-style-type: none"> Regulatory functions for infrastructure investments Coordinating, regulating and supervising the construction and maintenance of land, sea, air and rail transport and communications, as well as related infrastructure Land Acquisition and compensation for transport and infrastructure investments
	Ministry of Environment, Urbanisation and Climate Change	<ul style="list-style-type: none"> Obtaining environmental permits for emissions and discharges Environmental impact assessment decisions for projects
	Ministry of Labour and Social Services	<ul style="list-style-type: none"> Labour and working conditions and occupational health and safety
	Ministry of Agriculture and Forestry	<ul style="list-style-type: none"> Determining policies on the protection, development, operation, rehabilitation and maintenance of forest areas, combating desertification and erosion, reforestation of forests and pasture improvement Determining policies on nature conservation and protected areas, protecting, managing, developing, operating (or having them operated) national parks, nature parks, nature monuments, nature conservation areas, wetlands and biodiversity and protecting wildlife
	Ministry of Culture and Tourism Sarıyer National Parks Regional Directorate Istanbul Archaeology Museum	<ul style="list-style-type: none"> Recording cultural and natural heritage identified by the Ministry or requested to be identified by the General Directorate Classification of cultural and natural heritage to be protected Reviewing and deciding on land use plans and amendments to them Decision-making about application projects Deciding on protection areas for cultural and natural heritage sites.
	The Mayor of Istanbul Metropolitan Municipality and relevant departments such as Directorate of Urban Planning	<ul style="list-style-type: none"> Permits (e.g. permits and licences for construction works and traffic planning), licences, fire control, emergency response



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
	Water and Sewerage Administration (ISKI) Fire Department	
	Istanbul Governorship	<ul style="list-style-type: none"> The highest provincial authority responsible for internal affairs in the province of Istanbul.
	General Directorate of Highways	<ul style="list-style-type: none"> Land acquisition in the right-of-way alignment of the Project Approval of the design documents prepared by ICA Monitoring and supervision of the design, construction and operation phases of the Project
	Istanbul Provincial Directorate of Environment and Urbanisation	<ul style="list-style-type: none"> Istanbul Provincial Directorate of Environment and Urbanisation has regulatory functions related to the Project such as environmental impact assessment permits, environmental permitting and supervision. Istanbul Provincial Directorate of Environment and Urbanisation may have opinions on future construction activities.
	Istanbul Provincial Directorate of Disaster and Emergency	<ul style="list-style-type: none"> Regulatory functions and permissions, communication in relevant areas
	Istanbul Provincial Health Directorate	<ul style="list-style-type: none"> Regulatory functions and permissions, communication in relevant areas
	Istanbul Provincial Directorate of Culture and Tourism	<ul style="list-style-type: none"> Recording cultural and natural heritage Classification of cultural and natural heritage to be protected Reviewing and deciding on land use plans and amendments to them Decision-making about application projects Deciding on protection areas for cultural and natural heritage sites.
	Ministry of Family and Social Services Istanbul Provincial Directorate	<ul style="list-style-type: none"> Sets out enforcement policies for disadvantaged groups realises, implements and performs social services for disadvantaged groups



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
	Sarıyer District Governorship	<ul style="list-style-type: none"> Highest district administration Contact with poor and vulnerable people Communication regarding emergency response
	Sarıyer District Municipality	<ul style="list-style-type: none"> Specific comments on project, community and business communication/linkage Information sharing, communication on infrastructure and utilities issues
	ISKUR - Sarıyer	<ul style="list-style-type: none"> Assistance activities for the protection, development and expansion of employment and prevention of unemployment around Sarıyer Employment-related communication
	Mukhtars: <ul style="list-style-type: none"> Kilyos, Demirciköy, Uskumruköy, Gümüşdere, Zekeriya köy, Rumeli Kavağı, Maden, Yenimahalle, Merkez (Sarıyer), Kocataş, Büyükdere, Kazım Karabekir Paşa, Çayırbaşı Odayeri 	<ul style="list-style-type: none"> Specific views on the project, public communication/engagement and liaising with communities with particularly vulnerable groups Land acquisition information sharing and grievance management



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
	<ul style="list-style-type: none"> Social solidarity foundations of district governorships Social assistance units of municipalities 	<ul style="list-style-type: none"> Liaison at neighbourhood level on households below the poverty line, female-headed households, elderly, persons with disabilities
Local Community	<ul style="list-style-type: none"> Landowners Land Users Informal Land Users 	<ul style="list-style-type: none"> Dust, noise and vibration Land acquisition and forced resettlement Traffic and public health and safety Transport, purchasing power, mobility, public services and infrastructure impacts Employment and labour flow effects Information sharing, participation and complaint management Visual effects
	Vulnerable Groups (Residents of neighbourhoods with informal dwellings, Households headed by women, Households headed by children, Elderly, Registered and unregistered migrants, refugees and especially elderly couple living in a house near south portal of the Tunnel)	<ul style="list-style-type: none"> Risks of impacts on livelihoods without compensation Risks of difficulties in accessing information and participation, particularly in relation to land acquisition and grievance mechanisms (inter alia due to language barriers or lack of literacy) Lack of support and legal aid Impact risks on subsistence informal farming and animal husbandry Impacts on public amenities Increased public health and safety risks Risk of exposure to human rights violations, including child labour and forced or informal labour arrangements Increased risk of GBVAW exposure
	Sensitive receptors and users (hospitals, schools, parks, mosques and other public facilities)	<p>More sensitive to:</p> <ul style="list-style-type: none"> Dust, noise, vibration Traffic Occupational health and safety risks
Local Businesses	<p>The affected commercial organisations are:</p> <ul style="list-style-type: none"> Waste collection (non-hazardous recyclable materials such as metal, paper, plastic) 	<ul style="list-style-type: none"> Land acquisition and forced resettlement Dust, noise, vibration



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
	<ul style="list-style-type: none"> Çırçır Restaurant 	<ul style="list-style-type: none"> Traffic and transport problems (road closures, increase in traffic density, obstruction of company entrances and exits, etc.) Local procurement Visual Effects Employees
Workers	<ul style="list-style-type: none"> Employees and labourers of the project owner, contractor and subcontractors, Labour unions, including project workers, as well as other construction-related unions and confederations: Trade Unions: <ul style="list-style-type: none"> YOL-İŞ DEV YAPI- İŞ İNŞAAT - İŞ ÖZ İNŞAAT – İŞ YENİ YOL- İŞ İYİ- SEN İNŞAAT-SEN MES-ED-SEN DAYANIŞMA Confederations <ul style="list-style-type: none"> TÜRK-İŞ DİSK HAK-İŞ AKSIYON-İŞ 	<ul style="list-style-type: none"> Problems related to work and working conditions, including health and safety, workspace and accommodation issues Employment, rights and association/labour union issues, temporary employment and dismissal issues at the end of employment Child labour / forced labour / informal labour Complaint management / harassment control, Non-discrimination/ Gender equality and risks of gender-based violence and harassment.
Professional Organisations	<p>Chambers of commerce, industry and craftsmen, business associations as well as co-operatives and unions</p> <ul style="list-style-type: none"> Istanbul Chamber of Commerce Union of Chambers of Architects and Engineers of Turkey Istanbul Chamber of City Planners Istanbul Chamber of Agricultural Engineers Istanbul Chamber of Civil Engineers Istanbul Chamber of Commerce and Industry 	<ul style="list-style-type: none"> Information sharing and communication Local procurement and service provision



Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
NGOs	<ul style="list-style-type: none"> FEV (Foundation for the Physically Disabled) ISEM (Istanbul Metropolitan Municipality Directorate for the Disabled) Association for Solidarity with Asylum Seekers and Migrants Women Entrepreneurs Association of Turkey (KAGIDER) ÇEVKO ÇEKÜL Nature Association WWF (World Wildlife Fund) Turkey Global Environment Association (GEO) TEMA Foundation DAYKO Istanbul Urban Transformation Association Istanbul Metropolitan Municipality ULAŞIM A.Ş. Istanbul Public Transport Bus Association (ISTOD) Women's shelters of metropolitan municipalities and district municipalities Police and Gendarmerie Posts Public Prosecutor's Offices Family Court Judges Social Service Advice Line for Family, Women, Children and People with Disabilities Provincial Directorates of Family and Social Policies Ministry of Interior Violence Prevention and Monitoring Centre (ŞÖNİM) Mor Çatı Women's Shelter Foundation Health centres Bar Associations Municipal Women's Solidarity Centres 	<p>Specific views can be found on the following issues:</p> <ul style="list-style-type: none"> Deforestation and forest loss, Affordability and accessibility, Land acquisition, Access to sensitive groups, Migrant issues, Gender-based issues, GBVAW topics
RAP Application Partners	<ul style="list-style-type: none"> Ministry of Environment, Urbanisation and Climate Change Ministry of Agriculture and Forestry 	




Stakeholder Group (in order of priority)	Key Stakeholders	Task/Significant Impacts
	<ul style="list-style-type: none">• Ministry of Family, Labour and Social Services• Ministry of National Education• Turkish Employment Agency - Istanbul Provincial Directorate• Istanbul Provincial Directorate of Agriculture and Forestry (including district directorates of Agriculture and Forestry)• Istanbul Archaeology Museum• Sarıyer National Parks Regional Directorate• Sarıyer District Governorship• Istanbul Metropolitan Municipality• Sarıyer Municipality• Mukhtars of the affected neighbourhoods• Istanbul Chamber of Agriculture and district branches• Business, agriculture, agricultural economics, etc. departments of relevant universities• Valuation companies and specialists	




ANNEX B

*Grievance Form/Grievance
Closure Form*



Grievance Form		
Reference No: 		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <ul style="list-style-type: none">wish to raise my grievance anonymouslyrequest not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<ul style="list-style-type: none">By Post:Mailing address:Telephone: _____By E-mail _____I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:		
Date of Incident/Grievance		
	<ul style="list-style-type: none">One-time incident/grievance (Date _____)Happened more than once (how many times? _____)On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details):		



Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Date:	Name Surname Signature of the Person Closing the Complaint
...../...../.....	



ANNEX C

Grievance Database

Beştepe Mahallesi Dumlupınar Bulvarı No:6/1 İç Kapı No:16 Yenimahalle /Ankara/TÜRKİYE
T: +90 312 295 6301 | [infratechesp.com](mailto:info@infratechesp.com)

Turkey Beştepe Mah. Dumlupınar Bulv. No:6/1 İç Kapı No: 18 Yenimahalle Ankara / Türkiye

United Kingdom 74A HighStreet, Wanstead, London, E11 2RJ

Kazakhstan Almaty city, Bostandyk District, Al-Farabi Avenue, ap.17, Nurly Tau Business Center, Block B, Office 404

