

**TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY
PROJECT (PUMREP)**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Kayseri Water and Sewerage Directorate's (KASKİ) 13,000 KWe Solar
(Photovoltaic) Power Plant Project**

JUNE 2026

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LIST OF ABBREVIATIONS

IA	Impact Area
CIMER	Presidency's Communication Centre
YIMER	Foreigners Communication Centre
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monthly Report
ESS	Environmental and Social Standard
GBV	Gender Based Violence
CoC	Code of Conduct
GM	Grievance Mechanism
WGM	Worker Grievance Mechanism
LMP	Labor Management Plan
OIP	Other Interested Parties
PAP	Project Affected People
PIU	Project Implementation Unit
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
PUMREP	Türkiye Public and Municipal Renewable Energy Project
SPP	Solar Power Plant
RE	Renewable Energy
İLBANK	İller Bankası A.Ş.
WB	World Bank
KASKİ	Kayseri Metropolitan Municipality General Directorate of Water and Sewerage Administration

EXECUTIVE SUMMARY

The Türkiye Public and Municipal Renewable Energy Project (PUMREP) is funded by the World Bank (WB) to support the adoption of renewable energy (RE) technologies in municipalities and to promote renewable energy in the public sector. The project aims to support developing cities in identifying, preparing, and financing investments that enable municipalities to plan and invest in a sustainable future while enhancing their urban planning capacities.

The Kayseri Water and Sewerage Authority (hereinafter referred to as “KASKİ”) is the owner of this sub-project. Under PUMREP, KASKİ plans to establish a ground-mounted solar power plant (SPP) sub-project named KASKİ Bağpınar SPP, with a connection capacity of 13.000 kWe. To support the implementation of the sub-project, the Provincial Bank Inc. (İLBANK) acts as a Financial Intermediary (FI) and channels financial resources to municipalities.

İLBANK has established an Environmental and Social Management System (ESMS) effective as of December 24, 2023. The ESMS is designed to be consistent with the World Bank’s Environmental and Social Framework (ESF, 2018), including the Environmental and Social Standards (ESS) that form part of the ESF. Additionally, it is consistent with the environmental and social (E&S) policies and standards of other International Financial Institutions (IFIs) with which İLBANK collaborates. The ESMS will apply to all İLBANK projects and sub-projects financed through International Financial Institutions (IFIs), including the KASKİ Bağpınar Solar Power Plant.

The sub-project has been classified as a Medium Risk Category in accordance with the İLBANK ESMS and the World Bank’s Environmental and Social Framework (WB ESF), 2018. One of the tasks under the sub-project is the preparation of a Stakeholder Engagement Plan (SEP) in accordance with the İLBANK ESF, the WB ESF, and the national legislation in force in Türkiye.

The principles of transparency and project lifecycle, informed participation and feedback, inclusivity and sensitivity, and flexibility were used to identify the stakeholders of the sub-project. In this way, stakeholder consultations will be conducted transparently throughout the project’s lifecycle; all stakeholders will be informed; feedback will be collected using appropriate tools and methods; and special attention will be given to the participation of vulnerable individuals or groups to ensure equal access to information for all stakeholders.

The main objectives of this PKP are outlined below:

- Identify stakeholders affected by the subproject and establish and maintain constructive relationships with all identified stakeholders;
- Establish and foster effective and inclusive relationships with “project-affected parties,” “other interested parties,” and “vulnerable/disadvantaged groups” throughout the subproject’s lifecycle;
- Ensuring that subproject information is communicated to the public in a timely, understandable, and accessible manner;
- Providing mechanisms for stakeholders affected by the subproject to express their views, suggestions, and complaints

This Stakeholder Engagement Plan outlines the sub-project’s objective and scope in the first four sections, presents the methodology used to identify stakeholders, and specifies the needs of stakeholder categories for effective participation, as well as the tools and methods to be used to facilitate their participation. Under Sections 5 and 6, the plan outlines the structure of the sub-project implementation unit, the responsibilities of stakeholders in implementing the

plan, and the structure and operation of the complaint mechanism. In the 7th and final section, the plan emphasizes the responsibilities of the parties involved in monitoring and reporting on stakeholder participation activities and provides a roadmap for how these monitoring and reporting activities will be conducted and how feedback will be provided to these groups.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1. Objectives

PUMREP is funded by the World Bank (WB) to support the adoption of renewable energy technologies in municipalities and to promote renewable energy in the public sector. İLBANK and the World Bank have established a support system for developing cities to identify, prepare, and finance investments that enable municipalities to plan and invest in a sustainable future and, to this end, enhance their urban planning capacities. One of the areas of support is institutional capacity building and the fields of Energy Efficiency and Renewable Energy.

PUMREP (hereinafter referred to as the “Project”) aims to increase the use of renewable energy through self-generation in public facilities. The Project will contribute to expanding the distributed renewable energy market in public facilities and help the public sector demonstrate leadership in utilizing sustainable energy solutions to fulfill the country’s climate mitigation commitments and enhance energy security.

Under the PUMREP framework, KASKİ plans to implement a sub-project titled “KASKİ BAĞPINAR GES,” a ground-mounted solar power plant (GES) with a connection capacity of 13.000 kWe.

1.2. Components

The project will be implemented through four components:

Component 1: Renewable energy investments in central government facilities

Component 2: Renewable energy investments in municipalities

Component 3: Technical assistance and project implementation support

Component 4: Emergency Response Component

KASKİ has applied to İLBANK for co-financing of the KASKİ Bağpınar Solar Power Plant (13.000 KWe) under Component 2. The sub-project is located in Bağpınar Neighborhood, Melikgazi District, Kayseri Province, on 15740 block, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 189, 190, 191, 192, 193 parcels.

1.3. Location

KASKİ’s 13.000 KWe Solar (Photovoltaic) Power Plant Project is located in the Melikgazi district of Kayseri Province. Kayseri is located in Türkiye’s Central Anatolia Region. The sub-project site is situated within the boundaries of Bağpınar Neighborhood in Melikgazi District, one of the central districts of Kayseri Province. The sub-project site is 17.5 km away from the city center of Kayseri. The closest structures to the sub-project site are two solar power plant sites owned by third parties, located within the boundaries of Bağpınar Neighborhood and 400 m away from the site.

The land of the sub-project area belongs to the Treasury, and a preliminary allocation has been made to KASKİ for the implementation of the sub-project. During this period, the preliminary allocation will be converted into a final allocation upon the preparation of the investment project, its inclusion in the investment program, and the commencement of facility construction. Therefore, no land acquisition or expropriation will be required during the construction and operation phases of the sub-project.

The subproject involves the construction of a 20-meter-long underground energy transmission line (ETL). The electricity generated by the newly established Bağpınar Solar Power Plant subproject will be connected to the national power grid via the existing Bağpınar DM-2 TR7628 substation in the same region, using a 20 meter underground power transmission line within the solar power plant site, in accordance with relevant regulations.

No additional overhead power transmission lines will be constructed as part of the sub-project. The underground power transmission line (ETL) will be connected to the distribution center (Bağpınar GES ÖTM TÖTR15) to be established within the sub-project area. Therefore, no expropriation or land acquisition will be required

Information regarding the subproject location is presented in Table 1.

Table 1. Subproject Location

Information	Explanations/Notes
Province	Kayseri
District	Melikgazi
Neighborhood/Village	Bağpınar
Land Area (hectares)	156,260.29
Land Use Type According to Land Registry	Raw Land
Current Use of the Land	Vacant Land
Other Nearby Facilities and Activities	Third-Party-Owned Solar Power Plant (400 m, north) Third-Party-Owned Solar Power Plant (400 m, south) Livestock Farm (900 m) Bağpınar Neighborhood Mosque and Residence (1,000 m) Nearest residence in Bağpınar Neighborhood (1,100 m) Livestock Farm (1,100 m) Livestock Farm (1,200 m) Gas Station (1,300 m) Livestock Farm (1,600 m)

A map of the subproject location is shown in Figure 1:

Figure 1. Subproject Location

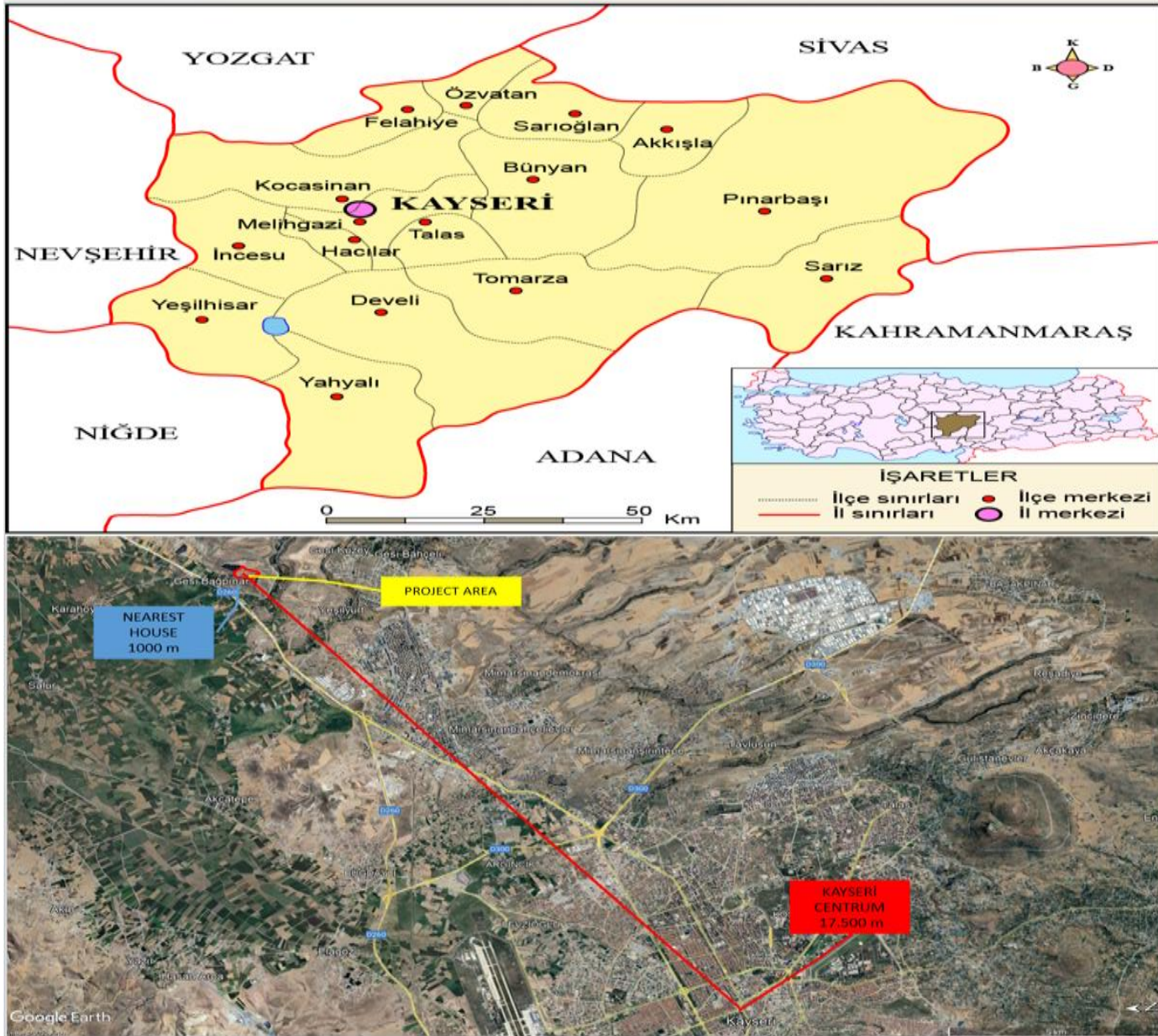


Table 2. Subproject Coordinates

Unit	Coordinates (In decimal format (WGS84))	
	Y	X
Subproject Area	35.643901	38.819971

1.4. Area of Influence

According to the DB EIA Guidelines, “where a project includes specifically identified physical elements, issues, and facilities that are likely to be affected by the project, the environmental and social risks and impacts shall be defined as the Project Impact Area (IA).” Therefore, the sub-project’s Area of Impact consists of urban or rural areas likely to be affected by the project,

its activities, and facilities directly owned, operated, or managed (including contractors/subcontractors).

The sub-project's Area of Impact covers the following environmental and social aspects:

To determine the Impact Area (IA), the sub-project area, surrounding settlements, and access roads were evaluated. When a circle with a 400-meter radius was drawn around the sub-project area to determine the Impact Area (IA), the nearest facilities are two third-party solar power plant sites located within the boundaries of the Bağpınar neighborhood and agricultural lands near the sub-project area.

Additionally, the settlement area closest to the sub-project is the Bağpınar neighborhood. However, since the households in the neighborhood are not located along the access road leading to the sub-project area, they do not pose a traffic risk. Considering the potential environmental and social impacts of the sub-project, it has been determined that the local residents living in the center of the Bağpınar neighborhood will not be affected by dust and noise from topsoil removal operations or by traffic risks. Therefore, the households in the neighborhood have not been included in the Impact Area. On the other hand, the solar power plant sites near the sub-project area have been assessed within the project's Impact Area due to potential dust, noise, and traffic impacts.

Figure 2. Map of Settlements and Facilities Close to the Subproject Area



2. OBJECTIVE / DESCRIPTION OF SEP

The KASKİ Bağpınar Solar Power Plant project will increase the diversity of renewable energy sources and provide sustainable and resilient electricity solutions for public services. This sub-project encompasses the construction of solar power plants, their connection to the grid, and the installation and operation of energy facilities.

Prepared in accordance with the World Bank's Environmental and Social Standard 10 (ESS10) – Stakeholder Engagement and Information Sharing principles, this Stakeholder Engagement Plan (SEP) provides a framework to support the establishment of a smooth engagement process among stakeholders who may be affected by or interested in the KASKİ Bağpınar Solar Power Plant project. The document also contributes to managing stakeholder expectations and supporting risk management by ensuring early, frequent, and open communication throughout the project lifecycle.

The main objectives of this PKP are outlined below:

- Identify stakeholders affected by the project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and foster effective and inclusive relationships with affected parties throughout the project lifecycle;
- Ensuring that project information is communicated to the public in a timely, understandable, and accessible manner;
- Providing mechanisms for affected parties to express their views, suggestions, and complaints

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1. Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- *Flexibility:* If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

For the KASKİ Bağpınar SPP project, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties, other interested parties and disadvantaged/vulnerable individuals or groups.

3.2. Affected parties and other interested parties

Project Affected Parties encompasses those who are likely to experience the impacts or potential risks to their physical environment, health, security, cultural practices, well-being, livelihoods or otherwise due to the project. These stakeholders may comprise individuals or groups, including local communities. Stakeholders include local communities, community members, and other parties who may be directly affected by the Project. Specifically, the following individuals and groups fall into this category:

- Residents of Bağpınar Neighborhood (1000 m)
- Barns located in Bağpınar Neighborhood near the sub-project area (900 m)
- Individuals engaged in agricultural activities in Bağpınar Neighborhood near the sub-project area
- Employees and officials at the two solar power plant sites near the sub-project area (400 m)

- Individuals who will be working on the sub-project

Other Interested Parties refers to individuals, groups, or organizations with an interest in the project. This interest may stem from the project's location, characteristics, impacts, or matters related to public interest. Examples of such parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

Other stakeholders are individuals or groups who are not directly involved in the project but may still be interested in its outputs, decisions, or activities. A list of this stakeholder group is provided below:

- Residents of Kayseri Province, excluding Bağpınar Neighborhood
- Ministry of Industry and Technology
- Ministry of Energy and Natural Resources
- Ministry of Environment and Urbanization
- Kayseri Provincial Directorate of Industry and Technology
- Kayseri Provincial Directorate of Environment, Urbanization, and Climate Change
- Kayseri Governor's Office
- Kayseri Metropolitan Municipality
- Melikgazi District Governor's Office
- Melikgazi District Municipality
- State Hydraulic Works 12th Regional Directorate
- Turkish Electricity Transmission Corporation (TEİAŞ) 11th Regional Directorate
- Turkish Electricity Distribution Corporation (TEDAŞ) 13th Regional Directorate
- Kayseri Provincial Branch of the Chamber of Electrical Engineers
- Anadolu Agency Regional Directorate
- Local Television Channels and Newspapers

3.3. Disadvantaged/vulnerable individuals or groups

Disadvantaged or Vulnerable Groups pertains to individuals or groups who are at a higher risk of being negatively impacted by the project's effects and may face more constraints than others in harnessing the benefits of a project. Such individuals or groups are also more prone to exclusion from or limitations in their ability to fully participate in the regular consultation process. Consequently, they may necessitate specific measures and assistance to engage effectively. This approach will consider factors related to age, encompassing both the elderly and minors, particularly in situations where they may be separated from their family, community, or other individuals upon whom they depend.

The vulnerable and disadvantaged groups living in Bağpınar Neighborhood, where the sub-project area is located, have been identified as follows:

- **People with disabilities and their caregivers:** Fieldwork in this neighborhood revealed that two individuals with intellectual disabilities live with their families. Due to their physical limitations, people with disabilities may be unable to read informational materials and may face difficulties accessing the venues where informational meetings are held. Caregivers of people with disabilities may struggle to attend informational meetings while leaving the individuals they care for behind.

- **Individuals over 65 living alone:** Fieldwork revealed that there is one person over 65 living alone in this neighborhood. It is anticipated that this individual may face difficulties accessing information due to physical and technological barriers.
- **Migrants and/or refugees:** It was determined that there are 4 Syrian and 1 Afghan migrants in the neighborhood. The neighborhood head stated that all of them earn a living by working as shepherds. Due to language barriers, this group may have difficulty participating in informational activities.

The table below provides an overview of vulnerable individuals and groups:

Table 3. Vulnerable and Disadvantaged Groups of Bağpınar Neighborhood

Group	Number	Explanation
Disabled Individual	2	It was learned that there are two individuals with intellectual disabilities in the neighborhood.
Over 65 Years of Age Living Alone	1	It was learned that there is one man over the age of 65 living alone in the neighborhood.
Immigrants and Refugees	5	It was learned that a total of five refugees—four of whom are Syrian and one of whom is Afghan—live in the neighborhood. The neighborhood headman noted that they all make a living by working as shepherds.

According to information provided by the neighborhood head, none of these vulnerable and disadvantaged individuals live within the sub-project's area of influence.

4. STAKEHOLDER ENGAGEMENT PROGRAM

The stakeholder engagement program outlines the engagement process, methods (including prioritization), consultation topics, and target stakeholders.

4.1. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

The needs, participation, and access levels of each stakeholder group defined in the previous section will vary. The appropriate methods, tools, and techniques for each stakeholder group are outlined below:

- **Project Affected Parties (PAPs)**

Stakeholder Group	Needs	Method, Techniques	Tools,	Frequency
Residents of Bağpınar Neighborhood	To be informed about sub-project activities	• Announcements to be published on the websites and social media accounts of relevant public institutions • Distribution of brochures in the relevant activity area • Posting informational posters around the relevant activity areas • Distribution of translated materials in Arabic and the Afghan languages (Pashto or Dari) in areas where Syrian and Afghan refugees reside • Adapting materials to meet the needs of people with disabilities living in the neighborhood and ensuring their distribution to these individuals. • Organizing a public consultation meeting		• Before the construction phase starts • In case of demand or significant change

		• Publications in local and national media outlets	
Stables in Baġpınar Neighborhood, near the sub-project area	To be informed about sub-project activities	• Announcements to be published on the websites and social media accounts of relevant public institutions • Distribution of brochures in the relevant area of activity • Posting informational posters around the relevant activity areas • Distribution of translated materials in Arabic and the Afghan languages (Pashto or Dari) at barns where Syrian and Afghan refugees work as shepherds • Organizing a community consultation meeting • Publications in local and national media outlets	• Before the construction phase starts • In case of demand or significant change
Those engaged in agricultural activities near the sub-project area in Baġpınar Neighborhood	To be informed about sub-project activities	• Announcements to be published on the websites and social media accounts of relevant public institutions • Distribution of brochures in the relevant area of activity • Posting of informational posters around the relevant areas of activity • Organizing a community consultation meeting	• Before the construction phase starts • In case of demand or significant change

		Publications in local and national media outlets	
Staff and officials at the two solar power plant sites near the sub-project area	To be informed about sub-project activities	- Announcements to be published on the websites and social media accounts of relevant public institutions - Distribution of brochures in the relevant area of activity - Posting of informational posters around the relevant areas of activity - Organizing a community consultation meeting - Publications in local and national media outlets	- Before the construction phase starts - In case of demand or significant change
People who will work on the subproject	To be informed about sub-project activities	- Official meetings with them - Correspondence addressed to them	- Before the construction phase starts - In case of demand or significant change

• **Other Interested Parties (OiPs)**

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
Residents of Kayseri Province who live outside the sub-project area	To have general information about the sub-project	Announcements to be published on the websites of relevant public institutions, in local media outlets, and on social media accounts	When necessary or in the event of a major change
Government Agencies: • Ministry of Industry and Technology	To have general information about the sub-project	- Correspondence addressed to them - Announcements to be published on the websites of relevant public institutions, in local media outlets,	Quarterly

• Ministry of Energy and Natural Resources • Ministry of Environment and Urbanization • Kayseri Provincial Directorate of Industry and Technology • Kayseri Provincial Directorate of Environment, Urbanization, and Climate Change • Kayseri Governor's Office • Kayseri Metropolitan Municipality • Melikgazi District Governor's Office • Melikgazi District Municipality • State Hydraulic Works 12th Regional Directorate • Turkish Electricity Transmission Inc. (TEİAŞ) 11th Regional Directorate • Turkish Electricity Distribution Inc. (TEDAŞ) 13th Regional Directorate • Kayseri Provincial Branch of the Chamber of Electrical Engineers • Kayseri KASKİ		and on social media accounts	
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Media: - Anadolu Agency Regional Directorate - Local TV Channels and Newspapers	To have general information about the sub-project	- Announcements to be published on the websites of relevant public institutions, local media outlets, and social media accounts - One-on-one interviews - Press releases	Quarterly
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• **Disadvantaged/Vulnerable Individuals or Groups**

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
People with disabilities and their caregivers	People with disabilities may be unable to read informational materials due to their physical limitations and may have difficulty accessing the venue where informational meetings are held. Caregivers of people with disabilities may find it difficult to attend informational meetings without leaving their care recipients behind.	Materials suitable for visually impaired individuals can be prepared. Care should be taken to ensure that venues for public participation meetings are accessible to people with physical disabilities. Informative materials can be provided to caregivers of people with disabilities through one-on-one meetings. Transportation assistance can be provided when they attend public participation meetings.	- Before the construction phase starts - In case of demand or significant change
Individuals aged 65 and older who live alone	Due to physical and technological barriers, they may face difficulties accessing information.	Information can be provided verbally through one-on-one or group-based sessions, or transportation	- Before the construction phase starts - In case of demand or

		assistance can be provided to attend meetings	significant change
Migrants and refugees	Participation levels may remain low due to the language barrier.	The materials must be translated into Arabic and an Afghan language (Pashto or Dari). Information can be provided orally in a group setting.	• Before the construction phase starts • In case of demand or significant change

4.2. Summary of Stakeholder Engagement During the Sub-Project Preparation Phase

A telephone conversation was held with the Neighborhood Head of Bağpınar on September 16, 2025. During the conversation, the Neighborhood Head was provided with information about the sub-project; information was obtained from him regarding the neighborhood's socio-economic status, population, demographic structure, sources of livelihood, education and health services, infrastructure services, transportation and traffic services, cultural assets, and vulnerable groups.

4.3. Stakeholder Engagement Plan

A stakeholder engagement plan is a vital tool for a project or organization to establish effective communication with its stakeholders, manage the project successfully, and achieve its objectives.

The first Stakeholder Participation Meeting (SPM) for the sub-project will be held in Bağpınar at a venue with sufficient capacity and facilities to facilitate comfortable and efficient communication, following the approval of the draft ESMP report by İLBANK. The PAPs (Project Affected Parties) and OIPs (Other Interested Parties) mentioned above will be invited to the SPM.

Prior to the SPMs, announcements will be published in local and national newspapers and on KASKİ's official website. Sub-project information brochures will be distributed to participants 10 days before the meeting begin, and sub-project maps will be available in the brochures as well as in public places such as village tea houses and village council offices. Announcements will not only be made through official channels but will also be accompanied by outreach to village heads prior to the meetings to inform them about the meetings and sub-projects, thereby encouraging local community participation.

In addition to official announcements, the KASKİ Social Specialist will reach out directly to community leaders to encourage local participation. To ensure the inclusion of vulnerable groups, such as seasonal migrants and Syrian refugees, on-site consultations will be held with

local leaders. Neighborhood visits will be conducted in accordance with the construction schedule. Through consultation meetings, village heads and local residents will be provided with detailed information regarding the complaint mechanism under the project and sub-projects.

Consultation meetings will begin with an introduction and explanation of the meeting's purpose and scope, followed by a final discussion session where questions, concerns, and suggestions are addressed after presentations by KASKI.

The main topics to be covered in the presentations are as follows:

- The objective and scope of the sub-project.
- Who is the project's main implementing body, project beneficiary, implementing organization, and project sponsors?
- What are the expected benefits of the project?
- What are the potential environmental and social impacts? An overview of the sub-project's anticipated environmental and social adverse impacts and the proposed measures to mitigate them (participants will be invited to discuss any additional adverse impacts they foresee and will provide their views on whether the planned measures are sufficient or suggest alternative or additional measures)
- Complaint mechanism
- Discussion (Q&A) Session

The consultation meetings will be conducted in a participatory manner. To minimize the project's negative social impacts, local residents will be encouraged to express their own ideas and opinions regarding the sub-project. A brochure covering these topics will be prepared and distributed during the consultation meetings as well as in public places. The brochure will include the necessary contact numbers and email addresses, and the local community will be encouraged to contact the sub-project's social experts during the consultation meetings.

4.4. Other Methods for Stakeholder Engagement

Regular field visits for face-to-face meetings will be conducted by the contractor's social specialist for the following purposes:

To manage complaint processes,

To further promote the project,

To identify population changes that may reveal the presence of disadvantaged/vulnerable individuals.

While field visits may also be conducted at the request of the local community, visits by the local community to sub-project management offices can also be considered a tool for stakeholder engagement activities.

In some cases, telephone calls or text messages may be preferred, but the preferred meeting method is face-to-face meetings.

A summary of this is presented in Table 3 below:

Table 4. Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Before the construction activities start Draft ESMP and SEP of the sub-project to be disclosed and consulted for finalization.	Informing about sub-project activities and recording comments and suggestions, answering questions Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	Conducting public participation meeting, publishing information about sub-project activities	Project Affected Parties	Kayseri KASKİ
	Before the construction activities start Draft ESMP and SEP of the sub-project to be disclosed and consulted for finalization.	Informing about sub-project activities Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	Announcements to be published on the websites and social media accounts of the relevant public institutions	Other Interested Parties	Kayseri KASKİ
	Before the construction activities start Draft ESMP and SEP of the sub-project to be disclosed and consulted for finalization.	Informing about sub-project activities and recording comments and suggestions, answering questions Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	One-to-one face-to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Kayseri KASKİ
Construction	During the construction phase	Informing about sub-project activities and recording comments and suggestions, answering questions	regular consultations, face to face meetings, official announcements, Printed materials such as Brochures, publishing information via website, social media accounts, bulletin board etc. about sub-project activities	Project Affected Parties	Contractor Consultant Kayseri KASKİ
	During the construction phase	Informing about the sub-project activities	Announcements to be published on the websites	Other Interested Parties	Contractor Consultant Kayseri KASKİ

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
			and social media accounts of the sub-borrower, correspondence between institutions		
	During the construction phase	Informing about sub-project activities and recording comments and suggestions, answering questions	One-to-one face-to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Contractor Consultant Kayseri KASKİ
Operation	During the operation phase	Informing about the sub-project activities	Announcements to be published on the websites and social media accounts of the sub-borrower	All stakeholder categories	Kayseri KASKİ

KASKİ will make the E&S documents for the sub-project available on its website in both Turkish and English¹. These documents will also be available at the KASKİ office and the Melikgazi District Municipality. In addition, sub-project posters and information regarding the complaint mechanism will be displayed at local locations, including the Bağpınar Neighborhood Council. Stakeholder consultations will be held to review the draft E&S documents before they are finalized and published. This process will ensure that stakeholders' views and concerns are taken into account and integrated, thereby promoting a more effective and inclusive outcome.

4.5. Proposed Strategy to Incorporate the Views of Vulnerable Groups

During the construction phase, the KASKİ social worker can first inform the local community about the timing and location of the construction work. During this outreach effort, the social worker also identifies the disadvantaged individuals mentioned above and assesses the necessary mitigation measures to address the negative impacts of the construction work. Since disadvantaged individuals may not be officially registered at any health or educational institution, it should be kept in mind that relying on secondary information sources such as village heads or teachers may not be sufficient. In fact, a detailed Public Consultation Meeting should be organized to identify these individuals. Face-to-face meetings will be held with the identified disadvantaged/vulnerable individuals. In cases where communication cannot be established (e.g., with individuals with intellectual disabilities or children), meetings will be held with parents or relatives.

During the planning and implementation phases of the sub-project, care will be taken to solicit the opinions of vulnerable or disadvantaged groups to ensure their needs are addressed. Households with individuals with disabilities, households with Syrian and Afghan refugees, and households with seasonal agricultural workers can be cited as examples of vulnerable or disadvantaged population groups. However, this list is not exhaustive. Ensuring the participation of these groups is absolutely necessary to promote inclusivity and address the challenges specific to them.

¹ <https://www.kaski.gov.tr/>

To identify these groups, we plan to engage with village heads and civil society organizations (CSOs) that work closely with these communities. To ensure the inclusion of specific groups, interviews and home visits will be conducted with them.

To further ensure the inclusion of vulnerable groups such as seasonal agricultural workers or refugees, KASKI's Project Social Specialist will prioritize gathering information about these groups during field visits and consultation preparations.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

As summarized above, the Sub-Project will be implemented using funding provided under the KABYEP Loan Agreement signed between the World Bank and ILBANK. Therefore, while the World Bank is the financier, ILBANK serves as the financial agent for PUMREP and has established a Project Management Unit (PMU). ILBANK has identified environmental, social, and OSH experts to manage protection issues under the PUMREP framework.

At the Sub-Project level, KASKI has also established a Project Implementation Unit (PIU) and appointed an environmental expert, a social expert, and an OSH expert to manage protection issues.

The organizational structure of the PUB to be established by the Sub-Borrower is presented in Figure 3:

Figure 3. PIU Organization Chart

Project Implementation Unit Personnel List
Contract Management
Deputy General Manager
Procurement Unit
Branch Manager
Construction Technician
Technical Management
Department Head
Technical Unit
Branch Manager - Civil Engineer
Civil Engineer
Civil Engineer
Electrical Technician
Electrical - Electronics Engineer
Mechanical Engineer
Mapping Technician
Financial Management
Branch Manager
Financial Unit
Officer
Monitoring and Evaluation
Civil Engineer
OSH
Occupational Health and Safety and Civil Defense Branch Manager
Social Specialist
Social Specialist/Sociologist
Environmental Specialist
Environmental Engineer

The Sub-Borrower will ensure the continuity of the PIU by ensuring the appointment and deployment of qualified staff and the continuity of Stakeholder Engagement Activities by allocating an appropriate budget throughout the life cycle of the sub-financing agreement.

Social Specialist who is shown in the organization chart of the Project Management Unit, will follow the implementation of the Stakeholder Engagement Plan on behalf of KASKI. People will be able to communicate their opinions, suggestions or questions about the sub-project or consultation process to this focal person.

5.2. Management functions and responsibilities

KASKI Project Implementation Unit (PIU) will be the party primarily responsible for the implementation of the SEP. KASKI PIU will have designated staff with responsibilities related to ESMP, SEP and GM.

In addition to KASKI PIU, the responsibilities and activities to be carried out by other stakeholders for the effective implementation of the SEP are presented in the table below:

Table 5. Responsibilities

Responsible Entity	Responsibilities	Activities
PMU of ILBANK	Monitor and control whether KASKI fulfills its responsibilities;	- Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues; - Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
PIU of KASKI	Planning, implementation, monitoring and reporting of SEP	- Conducting stakeholder engagement activities in close co-operation with ILBANK Project Management Unit - Management and resolution of grievances - Counselling on specific SEP activities; - Publicising major construction activities (such as road closures and service interruptions); - Reporting to ILBANK Project Management Unit on the implementation of SEP activities; - Effective implementation of the identified grievance mechanism in SEP and informing ILBANK Project Management Unit about the overall implementation status.
Supervision Consultant	To monitor and control whether Contractor fulfils its responsibilities	Review the SEP document to redefine the stakeholders affected by and/or interested in the sub-project and to follow up the implementation of the methods, instruments,

Responsible Entity	Responsibilities	Activities
		timing and participation levels identified in the SEP, • Interviews KASKI PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, • Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the sub-project, • Interacts with various stakeholders to get their views on SEP implementation, • Controls whether the necessary trainings are given to the personnel who will work during the construction phase, • Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other sub-project activities and to reveal actions, • Meets with WB safeguard policies and audit teams and responds to queries as necessary, • Monitors and reports on progress made in relation to the commitments defined in SEP.
Contractor	• To inform ILBANK on all matters related to relations with stakeholders; • To communicate and resolve grievances arising from subproject activities in close and co-operation with ILBANK	• Implements and develops Contractor's social policy, • Provides necessary resources for proper remedial actions, • Notify KASKI of any issues related to interaction with stakeholders; • Communicate and resolve grievances arising from subproject activities in line with KASKI's guidance; • Inform ILBANK Project Management Unit and KASKI about significant construction activities (such as road closures and service interruptions) and issues related to their interaction with stakeholders; • Maintain communication with KASKI Grievance Mechanism Contact Point for follow-up of grievances; • Organizing and conducting Stakeholder Participation/Consultation Meetings and related activities related to information sharing with the public; • Inform relevant local communities on environmental and social issues (e.g. noise, vibration, water quality monitoring, community health and safety, etc.); • Develop and implement a grievance mechanism for the environmental and social performance of the sub-project and the labour

Responsible Entity	Responsibilities	Activities
		force, including sub-contractors, prior to the commencement of construction works, in compliance with KASKI's Grievance Mechanism requirements. • The construction contractor should develop monthly ESMRs and submits to KASKI through the Supervision Consultant

6. GRIEVANCE MECHANISM

In line with ILBANK Environmental and Social Management System and World Bank's Environmental and Social Standard (ESS) 10 a grievance mechanism will be established by KASKİ to receive, resolve and follow up the concerns and grievances of sub-project affected communities. KASKİ PIU will be accessible to stakeholders and will respond to all grievances (complaints, requests, opinions, suggestions) at the earliest possible time. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded by the PIU in a predetermined timeline and according to their content, and to ensure that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to grievances will be satisfactory to both parties and activities will be monitored and complainants will be informed about the results of corrective actions. In addition, the mechanism required to designed to be suitable for receiving and redressing anonymous grievances. The grievance form in the Annex A will be used in the sub-project and anonymous submission of grievances will be allowed. In addition, the sub-project Grievance Mechanism will include a channel to receive and address confidential grievances related to Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) for which special measures are taken. KASKİ PIU is responsible for establishing close relations with all stakeholders.

In case a grievance is received in any of the grievance mechanisms presented below at different levels, the operational flow chart of the grievance mechanism will be followed. This scheme is presented in table 5:

Table 6. The operational flow chart of the Grievance Mechanism

Grievance Process	Requirement / Action
Submitting the grievance	Receiving the grievance by any communication channel explained in SEP.(At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment or Gender Based Violence (GBV), immediate action will be taken within 2 days of receipt of the grievance. In cases of sexual abuse and harassment or potential child abuse at sub-project sites, the grievance will be referred by the GM focal point (located at ILBANK headquarters) to the relevant legal authorities/service providers such as the Ministry of Family and Social Services, Public Prosecutor's Office)
Recording the grievance	The sample grievance will be registered by making an entry in the registration table. All grievances will be logged and feedback given to the complainant within two working days. If the complainant requests that this grievance be handled anonymously, the grievance will be logged anonymously and this request will be honoured.
Referring the grievance	The grievance will be forwarded to the relevant persons responsible for dealing with the grievance (site manager and Project Implementation Unit specialists at construction sites) no later than three working days after receipt (grievances involving emergency situations will be dealt with immediately as appropriate).
Assessment the grievance	Assessment of grievances within 10 working days and determination of whether the grievance meets the admissibility criteria.
Responding to the grievance	If the grievance is valid, corrective measures to resolve the grievance are determined and taken within 15 working days at the latest. If the resolution of the grievance will take longer, a partial response should be given to the complainant and the Grievance Closure Form should be completed.

	All comments and grievances will be responded to verbally or in writing in line with the communication method preferably specified by the complainant, if contact information is provided. At this point, it should be noted that the action and result taken for the anonymously recorded grievance should be shared on KASKI's website so that the anonymous complainant can be informed about the grievance and results.
Recording the outcome of the grievance	Processing of the grievance result in the registration table
Right to object	If the grievance cannot be resolved through the current process, applicants can always appeal to the relevant legal authorities. These institutions can be summarised as follows: - Civil Courts of First Instance - Administrative Courts - Commercial Courts of First Instance - Labour Courts, and - Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

6.1. Project Level Grievance Mechanism

The existing grievance mechanism of Kayseri KASKI will be utilised at sub-project level. In addition, measures will be implemented to ensure that anonymous grievances can be submitted and that cases of sexual harassment and sexual exploitation are received confidentially. Information on KASKI's grievance mechanism is provided below:

Website(includes an online grievance form): <https://www.kaski.gov.tr/iletisim>

E-mail: kaski@kaski.gov.tr

Call Centre: 185

Phone Number: [+90 352 432 04 32](tel:+903524320432)

Address: Yakut Mah. Mustafa Kemal Paşa Bul. No:186 Kocasinan / KAYSERİ

6.2. National Level Grievance Mechanism

ILBANK established a transparent and comprehensive Grievance Mechanism (GM) in September 2021 to receive, assess and resolve grievances related to each international project it finances and will be in place throughout the life cycle of this subproject. Stakeholders may, if they wish, submit their comments, suggestions and grievances to ILBANK through the following means of communication:

Website: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>

E-mail: bilguidb@ilbank.gov.tr and etikuidb@ilbank.gov.tr

Phone Number: +90 312-508 79 79

Address: ILBANK International Relations Department, Emniyet Mahallesi, Hipodrom Caddesi, No:9/21, Yenimahalle/ANKARA

In the last 10 years, Turkish citizens have adopted a centralised grievances system called the Presidential Communication Centre (CİMER). People from all walks of life and professions have developed the habit of writing letters of grievance to CİMER by e-mail. Therefore, this system should be added to institutional grievance mechanisms. Operating under the Presidential Directorate of Communication, CİMER aims to strengthen the state-society relationship. The information on CİMER is following:

Website: www.cimer.gov.tr

Call Centre: 150

Phone number: +90 312 525 55 55

There is also a grievance mechanism established for foreigners in Türkiye under the Presidency's Directorate of Communication. Information on the Foreigners Communication Centre (YİMER) is provided below:

Website: www.yimer.gov.tr

Call Centre: 157

Phone number: +90 312 5157 11 22

6.3. Grievance Mechanism for Workers

A separate grievance mechanism will be provided for all direct workers and subcontracted workers (and their organisations where relevant) to raise workplace concerns in accordance with the requirements of ESS2. These workers will be informed about the Grievance Mechanism and Code of Conduct (CoC) at the time of recruitment and will be provided with safeguards to protect them from retaliation for using this mechanism. The Workers' Grievance Mechanism (WGM) will be accessible to all workers and subcontractor workers. Grievances will be collected and reported to be managed within the scope of SEP, Workforce Management Plan (LMP) and Grievance Mechanism Procedure. Sub-project workers will be able to raise workplace issues such as unsafe or unhealthy working conditions, working conditions, wages, discrimination, harassment, health and safety concerns or other employment related issues through the grievance mechanism. It will be ensured that the grievance mechanism will be easily accessible for all workers of this sub-project. The design of the workplace grievance mechanism takes into account the grievance mechanism elements defined in the ESS10 and related guidance.

The process defined in the grievance flow chart will also be applied and executed for the workers' grievance mechanism. During the construction phase, the workforce requirement of the subproject will be 30 people at peak. Priority will be given to local employment. For these reasons, a campsite will not be established for the accommodation of workers. Grievance boxes will be placed in places such as cafeteria, common resting area and work area where workers can easily reach but away from security cameras. The boxes will be checked regularly

and can only be opened by the responsible person. The Grievance Mechanism for Workers will follow a structured process to address grievances in a timely and fair manner. Workers will be able to submit their grievances anonymously if they so wish. The grievance mechanism for workers guarantees that grievances will be investigated impartially and that there will be no retaliation against workers who file grievances. Workers' grievances will be kept in the grievance database.

6.4. Sensitive and Confidential Grievances

Specific procedures will be implemented by the sub-project in order to address sensitive and confidential grievances, particularly those that are related to Sexual Exploitation and Abuse/Harassment (SEA/SH). These measures will be implemented in accordance with the World Bank ESF Good Practice Note on SEA/SH.

First of all, the complaining party has the right to remain confidential under the Turkish Constitution and the right to apply to the court at any time (in accordance with the Turkish Labor Law No. 4857 and the Turkish Civil Code No. 4721). In addition, Sub-Borrower personnel and sub-project employees will be able to directly communicate (via e-mail) with the Ethics Committee based at ILBANK Head Office in case of sensitive grievances. This issue will be clarified in the consultations carried out and in the introduction of the grievance mechanism. For cases related to gender-based violence, SEA/SH in the workplace or any potential child abuse in sub-project implementation/sub-project sites, the grievance will be directed to the relevant legal authorities or service providers by the Social Focal Point (based at ILBANK Head Office).

In addition to the legal processes, the subproject will integrate a number of important steps in order to efficiently address sensitive grievances, such as those connected to SEA/SH. There will be methods for confidential reporting that will be implemented. These mechanisms will provide safe and easily available channels, such as call centers of KASKİ.

Grievances shall be handled in an impartial manner through the implementation of transparent and fair investigation procedures. The grievance mechanism tools described above will be used. However, in the case of grievances related to gender equality, sexual exploitation and abuse (SEA), or sexual harassment (SH), these will be given priority by the designated social specialists. All grievances will be treated as confidential, with additional safeguards applied to ensure the anonymity of complainants, particularly for such sensitive cases. Individuals will be able to submit their complaints confidentially and without pressure. Complaints should be submitted to the responsible grievance officer, who must, within 24 hours and only with the explicit consent of the complainant, forward the grievance directly to the social specialist responsible for the project within the PMU. The PIU Head may be informed only if they are not the initial recipient of the complaint. No other party shall be informed or involved, ensuring maximum protection of the complainant's identity. Regular awareness and training workshops will be held for all team members and stakeholders involved in the sub project. The social expert of the contractor and the social expert of KASKİ will organize consultation meetings to increase awareness of the subject matter. These sessions will concentrate on SEA/SH issues, preventative techniques, and reporting responsibilities in order to promote understanding and prevention.

7. MONITORING AND REPORTING

7.1. Summary of how SEP implementation will be monitored and reported

Reporting process that should be put into action during the implementation phase of the Project is an important tool to record and chase Project activities in compliance with the national and WB standards. Therefore, the requirements of such processes are presented table 6:

Table 7. Reporting Process Requirements and Distribution of Roles

Responsible Party	Roles & Responsibility
PIU	Submit monthly Environmental and Social Monitoring Reports (ESMR) prepared by the contractor to ILBANK
Construction Supervision Consultant	Check the monthly Environmental and Social Monitoring Reports prepared by the Contractor and submit them to the PIU
Contractor	The contractor will prepare monthly Environmental and Social Monitoring Reports including grievance records and stakeholder engagement activities to be submitted to KASKI and submit them to the consultant firm for control.

The ESMRs will include following indicators on grievance mechanism and stakeholder engagement activities:

Indicators for stakeholder engagement:

- Number of public participation meetings
- Number of participants of the public participation meetings disaggregated by gender, age, disability, nationality
- For each meeting, the minutes of meetings, actions agreed during these meetings, the status of these actions and how the comments have been incorporated into the sub-project activities will be included in the environmental and social monitoring reports

Indicators for grievance mechanism:

- Number of grievances in total and at local level
- Number of grievances received from stakeholders, sorted and analysed by category

Number of grievances that were (i) opened (ii) open for more than 30 days (iii) resolved (iv) closed and (v) included responses that satisfied complainants during the reporting period

7.2. Reporting back to stakeholder groups

During the preparation and construction phases of the Subproject, the construction contractor will prepare monthly reports on environmental and social performance for submission to Kayseri KASKI, which will include updates and indicators on the implementation of the

stakeholder engagement plan. The monthly reports will be shared with ILBANK and ILBANK will provide quarterly reports to the World Bank.

The person/unit to be assigned by Kayseri KASKI will provide feedback to stakeholder groups through public meetings, primarily in the subproject impact area. The summary of the public meetings will be published after the removal of identifying information in accordance with the Law on the Protection of Personal Data. Feedback received through the Grievance Mechanism (GM) will be responded to in writing and verbally. Important updates on the sub-project will be published on the website of Kayseri Metropolitan Municipality and Kayseri KASKI.

ANNEXES

Annex-A Sample Grievance Submission Form

		KASKI	
		SOLAR POWER PLANT PROJECT	
		GRIEVANCE FORM	
Person Filling Out the Form:		Date and time:	
Interview Agenda:		Reference No: KASKI-Project Code-0001-2..	
1. INFORMATION ABOUT THE COMPLAINANT			
Name surname: <i>If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.</i>		How received the Grievance:	
TC Identification number:		Telephone / Toll Free Line ☐	
Telephone:		Face to Face Meeting ☐	
Address:		Website / Email ☐	
Email:		Other (Explain) ☐	
Stakeholder Type			
Public ☐	PAP ☐	Private Enterpris ☐	Trade Associatio ☐ NGO ☐
Interest Groups ☐	Industrial Assosiaction ☐	Labor Union ☐	Media ☐ University ☐
2. DETAILED INFORMATION ABOUT THE GRIEVANCE			
Description of the grievance:			

Solution method requested by the complainant	
Registrant Name Surname/Signature	Complainant Name Surname/Signature

Annex-B Sample Grievance Closure Form

	KASKI	
	SOLAR POWER PLANT PROJECT	
	GRIEVANCE CLOSE OUT FORM	
Reference form:		
1. DETERMINATION OF CORRECTIVE ACTION		
1		
2		☐
3		☐
4		☐
5		☐
2. CLOSE OUT THE GRIEVANCE		
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>		
Name Surname / Signature of the Person Closing the Grievance/Date		Name Surname / Signature of Complainant/Date

Annex-C Sample Consultation Form (For Stakeholder Participation Meeting(s))

		KASKI	
		SOLAR POWER PLANT PROJECT	
		CONSULTATION FORM	
Person Filling Out the Form:		Date time and place:	
Meeting Agenda:		Interview Registration Number:	
1. INTERVIEW INFORMATION			
Interviewed Institution:		Form of Communication	
Name and Surname of the Interviewee:		Telephone / Toll Free Line ☐	
Telephone:		Face to Face Meeting ☐	
Address:		Website / Email ☐	
Email:		Other (Explain) ☐	
Stakeholder Type			
State agency ☐	PEB ☐	Private Enterpris ☐	Job Room ☐ NGO ☐
Interest Groups ☐	Industrial Unions ☐	Labor Union ☐	Media ☐ University ☐
2. INTERVIEW DETAILS (List of Invitees and actual participants, Summary of presentations made by whom, minutes of meeting will be annexes of this form.)			
Questions about the project:			
Concerns/feedback regarding the project:			
Responses to the views expressed above:			

Annex-D Sample Grievance Log Form

[illegible]

