

# **Diyadin Geothermal Resource Exploration Project**

Stakeholder Engagement Plan

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## Table of Contents

1. INTRODUCTION .....	1
1.1. Objectives of the SEP .....	1
1.2. Structure of the SEP .....	2
2. PROJECT DESCRIPTION .....	3
3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES .....	10
4. STAKEHOLDER IDENTIFICATION AND ANALYSIS .....	12
4.1. Project-Affected Parties .....	12
4.2. Other Interested Parties .....	14
4.3. Disadvantaged / Vulnerable Individuals or Groups .....	16
4.4. Internal Stakeholders .....	16
4.5. Summary of Project Stakeholder Needs .....	17
5. STAKEHOLDER ENGAGEMENT PROGRAM .....	22
5.1. Purpose and Timing of Stakeholder Engagement Program .....	22
5.2. Proposed Strategy for Information Disclosure .....	27
5.3. Proposed Strategy for Consultation .....	27
5.4. Proposed Strategy to Incorporate the View of Vulnerable Groups .....	28
5.5. Timelines .....	28
5.6. Review of Comments .....	28
5.7. Future Phases of Project .....	28
6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES .....	30
6.1. Resources .....	30
6.2. Management Functions and Responsibilities .....	30
7. GRIEVANCE MECHANISM .....	31
7.1. External (Public) Grievance Mechanism .....	31
7.2. Grievance Mechanism for Internal Stakeholders (Employees) .....	36
8. MONITORING AND REPORTING .....	37
8.1. Involvement of Stakeholders in Monitoring Activities .....	37
8.2. Reporting Back to Stakeholder Groups .....	37
9. ALTERNATIVE APPROACHES AND MECHANISMS FOR ENGAGING STAKEHOLDERS IN THE CONTEXT OF CORONAVIRUS PANDEMIC .....	38
9.1. Design of an Interim Stakeholder Engagement Process .....	38
9.2. Alternative Approaches to Engagement .....	39
10. CONTACT INFORMATION FOR THE STAKEHOLDERS .....	40
ANNEXES .....	41
Annex A – Table of Contents for the Public Consultation Documentation .....	41
Annex B – Stakeholder Engagement Log .....	42
Annex C – Sample Grievance Form .....	43
Annex D – Sample Grievance Closeout Form .....	45
Annex E – External Grievance and Feedback Register .....	46

## List of Tables

Table 2-1. Exploration Licenses of Zorlu Jeotermal .....	5
Table 2-2. Settlements in the Vicinity of the Project Exploration Wells .....	5
Table 2-3. 2022 Population of the Closest Settlements .....	5
Table 2-4. Project Land Use and Land Ownership .....	6
Table 3-1. Summary of the Official Correspondence with the Governmental Authorities .....	10
Table 4-1. Project Stakeholder Groups – Project Affected Parties .....	13
Table 4-2. Project Stakeholder Groups – Other Interested Parties .....	14
Table 4-3. Project Stakeholder Groups – Disadvantaged and Vulnerable Individuals or Groups .....	16
Table 4-4. Project Stakeholder Groups – Internal Stakeholders .....	16
Table 4-5. Summary of Project Stakeholder Needs and Interests to the Project .....	17
Table 5-1. Stakeholder Engagement Strategy and Program for the Project .....	23
Table 7-1. Steps of External (Public) Grievance Mechanism .....	33
Table 9-1. Alternative Approaches and Mechanisms for Engaging Stakeholder in the Context of Coronavirus Pandemic .....	38
Table 9-2. Virtual and Nonvirtual Communication Channels .....	39
Table 10-1. Project Contact Information .....	40

## List of Figures

Figure 2-1. Workflow for Geothermal Well Drilling Activities .....	3
Figure 2-2. Zorlu Jeotermal Exploration License Areas .....	4
Figure 2-3. View of ZDM-2 Well Area .....	7
Figure 2-4. View of ZDM-3 Well Area .....	8
Figure 2-5. View of ZDM-6 Well Area .....	9
Figure 7-1. External (Public) Grievance Mechanism .....	32

## Acronyms and Abbreviations

DSI	State Hydraulic Works
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EPDK	Energy Market Regulatory Authority
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
IBRD	International Bank for Reconstruction and Development
JESDER	Geothermal Power Plant Investors Association
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MTA	Mineral Research and Exploration General Directorate
NGO	Non-governmental Organization
OHS	Occupational Health and Safety
OP	Operational Manual
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
PIF	Project Information File
PPM	Public Participation Meeting
RSM	Risk Sharing Mechanism
SEP	Stakeholder Engagement Plan
TKYB	Development and Investment Bank of Türkiye
WB	World Bank

## 1. INTRODUCTION

Zorlu Jeotermal Enerji Elektrik Üretim A.Ş. (Zorlu Jeotermal) is planning to implement Diyadin Geothermal Resource Exploration Project in Diyadin district of Agri province in eastern Türkiye within the scope of the Risk Sharing Mechanism (RSM) for Resource Validation Program of the World Bank (WB) financed Türkiye Geothermal Development Project<sup>1</sup>.

The objective of the RSM is to increase private sector investment in geothermal exploration drilling in Türkiye by providing partial coverage of drilling costs in case of unsuccessful exploration wells. Türkiye Kalkınma ve Yatırım Bankası A.Ş. (TKYB) serves as the implementation agency for the RSM. The WB, in its role as the Trustee of the Clean Technology Fund (CTF), is responsible for supervising the implementation of the RSM by the TKYB.

As a Geothermal Developer/Beneficiary, Zorlu Jeotermal has applied to and been shortlisted within the scope of the third application round of the RSM for Diyadin Geothermal Resource Exploration Project for the exploration drilling of ZDM-2, ZDM-3, and ZDM-6 wells within Exploration License No. 37 (which has been converted to Operation License No. 15 in September 2024) (hereinafter “the Project” refers to this scope as part of the RSM process).

This Stakeholder Engagement Plan (SEP) has been prepared by GEM Sustainability Services and Consultancy Inc. (GEM or the Responsible Party) in line with RSM Beneficiary Manual 3.0 (April 2023) as part of Zorlu Jeotermal’s RSM application process.

This SEP will be applicable throughout the Project life. It is a living document, which is to be reviewed and updated by Zorlu Jeotermal as needed.

### 1.1. Objectives of the SEP

The objective of this SEP is to ensure that Project Affected Persons (PAPs), internal stakeholders (direct and contracted workers of the Project) and other interested stakeholders are provided with relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its potential E&S impacts.

The stakeholder engagement process under the SEP has been designed to help:

- identify and involve all potentially affected and interested stakeholders,
- generate a good understanding of the Project amongst those that will be affected,
- identify issues early in the Project cycle that may pose risks to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective, and efficient),
- establish a system for communication between the Project and communities that is of benefit to all parties.

Specifically, the SEP aims to:

- define a consultation approach for stakeholders in relation to Project activities to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's E&S impacts,
- identify resources and responsibilities for implementation and monitoring of the consultation program,

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<sup>1</sup> <https://projects.worldbank.org/en/projects-operations/project-detail/P151739>

- set up a grievance mechanism for the external stakeholders, including a process to address views and concerns,
- provide an effective grievance mechanism for the Project's internal stakeholders (direct and contracted workers) to raise their workplace concerns.

This SEP will guide Zorlu Jeotermal towards implementing a structured stakeholder consultation and engagement during all stages of the Project implementation in line with Corporate E&S Policy and Procedures.

Through this Project specific SEP, Zorlu Jeotermal is committed to engaging openly and actively with the local communities, governmental/non-governmental organisations, and Project workers (direct and contracted) on all Project-related subjects and activities in a manner that is consistent with the national legislation and applicable good international practice (GIP).

## **1.2. Structure of the SEP**

This SEP is structured to include the following:

- Chapter 2: Project Description
- Chapter 3: Brief Summary of Previous Stakeholder Engagement Activities
- Chapter 4: Stakeholder Identification and Analysis
- Chapter 5: Stakeholder Engagement Program
- Chapter 6: Resources and Responsibilities for Implementing Stakeholder Engagement Activities
- Chapter 7: Grievance Mechanism
- Chapter 8: Monitoring and Reporting
- Chapter 9: Alternative Approaches and Mechanisms for Engaging Stakeholders in the Context of Coronavirus Pandemic
- Chapter 10: Contact Information for the Stakeholders

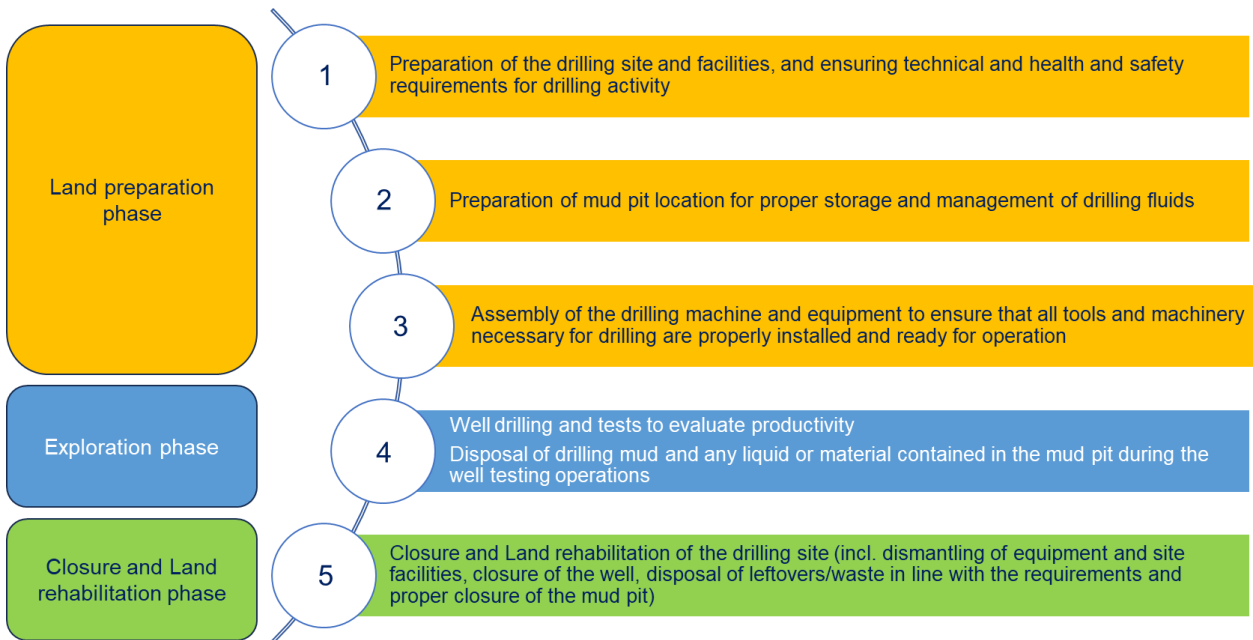
## 2. PROJECT DESCRIPTION

Diyadin Geothermal Resource Exploration Project within the scope of the RSM process involves the drilling of geothermal exploration wells ZDM-2, ZDM-3, and ZDM-6 within the Exploration License No.37 (hereinafter “the Project” refers to this scope as part of the RSM process) and the subsequent well testing to assess the potential of the area’s geothermal resource capacity for energy generation or alternative uses. Potential alternative uses of the resource will be evaluated upon completion of the well testing including potential use of the exploration wells either for production or re-injection purposes. In addition to drilling and well testing, the Project also includes earthworks and site preparation activities as well as land rehabilitation activities.

The Project is performed in three main phases;

- (i) land preparation (presented in orange color below),
- (ii) exploration (presented in blue color below) and,
- (iii) closure and land rehabilitation (presented in green color below).

The steps of the overall workflow under these phases are summarized below:



**Figure 2-1. Workflow for Geothermal Well Drilling Activities**

The exploration license areas are shown in Figure 2-2 and information on the license areas is summarized in Table 2-1. As can be seen in Figure 2-2, an area in the form of a square exists in the middle of the two exploration licenses. This area is a licensed geothermal area of a private company carrying out greenhouse activities.

Exploration License No. 37 is at a distance of 60 km to Agri city center and 12 km to Diyadin district center. Exploration wells ZDM-2 and ZDM-3 are located in Asagidaloren Village of Diyadin district and ZDM-6 is located in Mollakara Village of Diyadin district.



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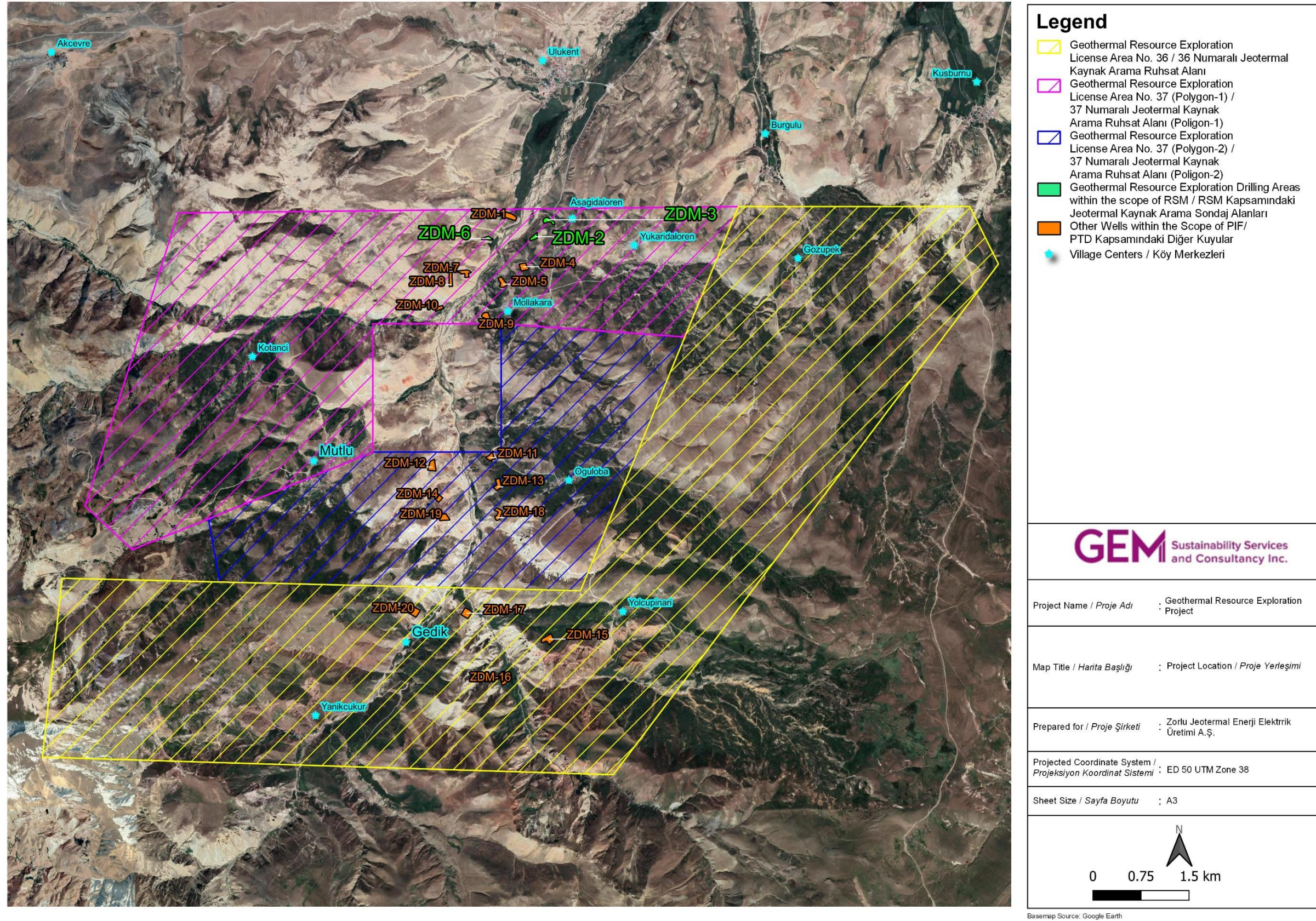


Figure 2-2. Zorlu Jeotermal Exploration License Areas



**Table 2-1. Exploration Licenses of Zorlu Jeotermal**

Information	Exploration License No. 36	Exploration License No. 37	
Location	Agri Province, Diyadin District, Gedik Village	Agri Province, Diyadin District, Mutlu Village	
Valid From	31 August 2020	31 August 2020	
Valid Until	31 August 2024 (*)	31 August 2024 (*)	
Exploration License Area	4,949.28 ha	4,345.16 ha	
		Polygon-1 (2,701.36 ha)	Polygon-2 (1,643.80 ha)
Exploration wells within Exploration License Area	Four wells:	Ten wells:	Six wells:
	<div>✓ ZDM-15</div> <div>✓ ZDM-16</div> <div>✓ ZDM-17</div> <div>✓ ZDM-20</div>	<div>✓ ZDM-1</div> <div>✓ ZDM-2 (**)</div> <div>✓ ZDM-3 (**)</div> <div>✓ ZDM-4</div> <div>✓ ZDM-5</div> <div>✓ ZDM-6 (**)</div> <div>✓ ZDM-7</div> <div>✓ ZDM-8</div> <div>✓ ZDM-9</div> <div>✓ ZDM-10</div>	<div>✓ ZDM-11</div> <div>✓ ZDM-12</div> <div>✓ ZDM-13</div> <div>✓ ZDM-14</div> <div>✓ ZDM-18</div> <div>✓ ZDM-19</div>
Environmental Impact Assessment (EIA) Decision	“EIA Not Required” Decision granted by Agri Provincial Directorate of Environment, Urbanization and Climate Change on 4 July 2022. As per Article 17 of the EIA Regulation, if a Project, without any force majeure, is not initiated within five (5) years of the “EIA Not Required” Decision, then the Decision shall be considered invalid.		
(*) In August 2023, the exploration licenses have been extended for 1 year by Agri Provincial Special Administration (please see Appendix A of the ESMP).			
(**) Drilling wells within the scope of RSM process.			

The settlements in the vicinity of the exploration wells are listed in Table 2-2 below with distances from the closest buildings within each settlement and their relative directions.

**Table 2-2. Settlements in the Vicinity of the Project Exploration Wells**

Exploration Well	Settlement	Distance (m) of the Well to Settlement Center	Distance (m) of Well to Closest Building in the Settlement	Direction of the Well with respect to Settlement Centre
ZDM-2	Asagidaloren Village	590	485	Southwest
	Yukaridaloren Village	1,518	1,340	West
ZDM-3	Asagidaloren Village	285	227	West
	Yukaridaloren Village	1,278	1,095	Northwest
ZDM-6	Mollakara Village	1,137	1,024	Northwest
	Asagidaloren Village	1,284	929	Southwest

The population of Diyadin district was 19,556 in 2022 and the populations of the closest settlements are provided in Table 2-3.

**Table 2-3. 2022 Population of the Closest Settlements**

Settlement	2022 Population (*)		
	Female	Male	Total
Mutlu Village (Exploration License No. 37)	296	317	613
Asagidaloren Village (ZDM-2 and ZDM-3)	97	112	209
Mollakara Village (ZDM-6)	178	215	393

(\*) Source: <https://biruni.tuik.gov.tr/>

Land use requirements for the drilling activities are limited to the EIA permitted drilling areas (all Project components and equipment such as mud pit, septic tank, chemical storage area, drill equipment, on-site accommodation will take place within this EIA permitted areas). To this end, in total 2.4 ha of the entire

4,345.16 ha (total area for Exploration License No. 37) is permitted to be used by the Project activities that will take place at ZDM-2, ZDM-3 and ZDM-6 well locations.

Information on land use and land ownership at the well locations is summarized below.

**Table 2-4. Project Land Use and Land Ownership**

Well	Working area for well drilling (m <sup>2</sup> ) (EIA Permitted Areas)	Settlement	Lot/ Parcel	Ownership	Land Use Specification (***)
ZDM-2	7,453.9	Asagidaloren Village	102/2	Legal entity	Meadow (Çayır)
ZDM-3	10,858.3		102/25 (*)	Zorlu Jeotermal	Meadow (Çayır)
ZDM-6	6,066.2	Mollakara Village	102/12	Included within the scope of Article 5/b classification of Pasture Law (Law No. 4342) (**)	Raw soil (Ham Toprak)

Source: Project Information File (PIF, July 2022), Parcel Inquiry website ([parselsorgu.tkgm.gov.tr](http://parselsorgu.tkgm.gov.tr)), and Zorlu Jeotermal.

(\*) This private property was formerly registered as parcel no.102/8 and deactivated through a Partitioning Transaction dated 19 December 2022 and divided into two separate parcels: Lot/Parcel No: 102/24 and 102/25 ([parselsorgu.tkgm.gov.tr](http://parselsorgu.tkgm.gov.tr)). Lot/Parcel No: 102/24 is registered as a pylon area (4 m<sup>2</sup>). The total area of Lot/Parcel No: 102/25 is 13,926 m<sup>2</sup>. Lot/Parcel No: 102/25 has been acquired by Zorlu Jeotermal (title deed dated 15 February 2023, please see Appendix D of ESMP). Zorlu Jeotermal requested the official opinion of Agri PDoEUCC on the validity of the “EIA Not Required” Decision after the Partitioning Transaction. Agri PDoEUCC stated in its official letter dated 10 April 2023 that “EIA Not Required” Decision is still valid as the EIA area has not changed (please see Appendix B of ESMP).

(\*\*) According to Article 5/b of Pasture Law, based on the needs determined by the commission, the following places shall be allocated as pasture, summer, and winter grazing lands to villages or municipalities: Lands under the state's jurisdiction and control or owned by the Treasury, which are deemed suitable (based on surveys) for use as pastures, summer, and winter grazing lands.

(\*\*\*) Information on land use specification given in this column is taken from Parcel Inquiry website ([parselsorgu.tkgm.gov.tr](http://parselsorgu.tkgm.gov.tr)). It should be noted that, as per Annex-4 of the Project PIF, ZDM-2, ZDM-3, and ZDM-6 well locations are classified as marginal agricultural land. As per the official letter of Provincial Directorate of Agriculture and Forestry dated 1 June 2023, the land use specification of the ZDM-3 well location (Lot/Parcel No: 102/25 of Asagidaloren Village) has been determined as “Dry Marginal Agricultural Land” and the permit for use of agricultural land for non-agricultural purposes has been granted.

The exploration studies will start at ZDM-3 well location which is owned by Zorlu Jeotermal. Based on the outcome of the well tests the decision to continue with other well locations will be made. In that case, Zorlu Jeotermal will consider either lease of the land from the landowner(s) through execution of land lease agreements or purchase of the land on willing buyer-willing seller basis. Other necessary permissions for land use will be obtained from the relevant authorities.

Images for each well location are shown below.



Image obtained from PIF, July 2022



Image as of August 2024

**Figure 2-3. View of ZDM-2 Well Area**





Image obtained from PIF, July 2022



Image as of August 2024

**Figure 2-4. View of ZDM-3 Well Area**





Image obtained from PIF, July 2022



Image as of August 2024

**Figure 2-5. View of ZDM-6 Well Area**

### 3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The stakeholder engagement activities within the scope of the Project started with the national EIA process. The EIA Regulation categorizes investments as projects subject to full-scale EIA process (Annex-1) or projects subject to screening-elimination criteria (Annex-2).

Geothermal exploration projects fall under Annex-2 (*Article 55 – Mine, petroleum and geothermal resource exploration projects except exploration by utilization of seismic, electric, magnetic, electromagnetic, geophysical, etc. methods*) of the 2014 EIA Regulation in force<sup>2</sup> back then. Therefore, a Project Information File (PIF) was prepared in line with Annex-4 of the 2014 EIA Regulation for Diyadin Geothermal Resource Exploration Project including all the twenty (20) exploration wells within the Exploration Licenses No. 36 and No. 37. Subsequently, an “EIA Not Required” Decision was granted by Agri Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC) on 4 July 2022.

According to the 2014 EIA Regulation, it is a legal obligation for the project owners only during a full EIA process, i.e. for Annex-1 projects, to organize a Public Participation Meeting (PPM). As the Project was not subject to a full EIA process, a PPM was not conducted as part of national EIA process. This said, the PIF was publicly disclosed at the official website of the MoEUCC and has been fully available for the public to review<sup>3</sup>.

Within the scope of the national EIA process, governmental authorities have provided their official views as summarized in Table 3-1.

Zorlu Jeotermal had engagement with the local authorities and the neighbouring geothermal greenhouse owner as part of the land acquisition consultations held in early 2023. In February 2023, Zorlu Jeotermal purchased the parcel of ZDM-3 well location from a private owner on willing buyer-willing seller basis.

**Table 3-1. Summary of the Official Correspondence with the Governmental Authorities**

Governmental Authority	Date of the Official Letter	Content of the Official Letter
Ministry of Agriculture and Forestry – 13 <sup>th</sup> Regional Directorate	6 June 2022	<p>The official letter states that as a result of the review of the PIF, it has been concluded that the activity area is not located in a protected area within the scope of Law on Land Hunting (Law No. 4915, 2003), National Parks Law (Law No. 2873, 1983) and Regulation on the Protection of Wetlands.</p> <p>To this end, there is no objection of the authority regarding the implementation of the Project, if the abovementioned related laws and regulations are strictly complied with, and the commitments stated in the PIF are adhered to.</p>
Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works (DSİ), 8 <sup>th</sup> Regional Directorate	19 June 2022	<p>There is no objection of the authority on the condition that the following are met within the EIA permitted areas (to be explicitly referenced within the PIF):</p> <ul style="list-style-type: none"> <li>- In case of any Project-related adverse impacts on the quality and quantity of groundwater, all damages will be borne by the owner of the activity, and the activity will be ceased, and the actions will be put in place as per the requirements of the related institution.</li> <li>- All necessary measures for containment and leak-proofness of the Project components and waste areas to be in place. All applicable legislation will be complied with in the framework of the protection of groundwater and groundwater resources.</li> <li>- Throughout construction, operation, and subsequent stages of the activity, no solid or liquid waste shall be discharged to groundwater and streams, the flow of dry streams shall not be disrupted, the specified permitted EIA</li> </ul>

<sup>2</sup> 2014 EIA Regulation (Official Gazette Date: 25 November 2014; No: 29186).

<sup>3</sup> <https://eced-duyuru.csb.gov.tr/eced-prod/duyurular.xhtml>



Governmental Authority	Date of the Official Letter	Content of the Official Letter
		coordinates shall not be exceeded, necessary precautions should be taken regarding flooding and material flow, the narrowness of dry and perennial flowing river beds corresponding to the mentioned areas shall not be altered, river bed stability shall not be compromised, unrestricted flow should be maintained, no waste materials shall be dumped into rivers, no damage shall be caused to agricultural lands, and all damages or losses that may occur due to the Project activities shall be covered by the activity owners/facility operators. Compliance with the relevant provisions of the Water Pollution Control Regulation, applicable laws, and other commitments as stated in the PIF is mandatory throughout Project implementation.
	22 May 2023	Activities to take place on Lot/Parcel No: 102/25 are permitted on the condition that 10-meter protection zone from the dry riverbed is established, and necessary flood protection measures are put in place.
Governorship of Agri, Provincial Directorate of Agriculture and Forestry	23 June 2022	<p>Amongst the 20 well locations within the scope of the PIF, the official letter states that at the well locations classified as pasture, as annexed to the official letter, no activity or action should be undertaken without applying for a change of allocation purpose of these pasture lands as per Article 14 of the Pasture Law (Law No. 4342, 1998).</p> <p>Furthermore, for lands classified as "agricultural land, uncultivated land, meadow" within the EIA permitted well areas, Provincial Directorate has no objection if the necessary permits are obtained in accordance with the provisions of Law on Soil Conservation and Land Use (Law No. 5403, 2005).</p> <p>Information on land use and ownership for 20 parcels is annexed to the official letter.</p>
	1 June 2023	<p><u>Decision on the Land Use Specification of ZDM-3 Well Location:</u></p> <p>As per the on-site study conducted on 23 May 2023 by the technical personnel from the Provincial Directorate of Agriculture and Forestry, the land use specification of Lot/Parcel No: 102/25 of Asagidaloren Village, ZDM-3 well location, has been determined as <b>"Dry Marginal Agricultural Land"</b>.</p> <p>The parcel area, which is 1.3921 ha, is granted "Non-Agricultural Use" on the condition to adhere to the requirements as set out in the official letter of DSI dated 22 May 2023 and the conditions established in the Soil Conservation Project.</p> <p>As per the Article 12(8) of the Regulation on Protection, Utilization, and Planning of Agricultural Lands, <i>"Permissions granted for land use shall be considered invalid if, <b>within two years</b> from the date of permission, plans are not approved for non-agricultural purposes or if license is not obtained for the structures used for agricultural purposes. The granted permissions cannot be used for purposes other than their intended use. In the event that unauthorized use is determined, procedures shall be carried out in accordance with Articles 20 and 21 of the Law."</i></p> <p>As per Article 9(15) of the Circular on the Protection, Use, and Planning of Agricultural Lands (Circular Date: 09 May 2023, No: E-58125898-230.04.02-9637520), the relevant authority shall inform the Provincial Directorate within one month from the date when the granted permissions are linked to the Plan or License. Therefore, it is necessary to notify Provincial Directorate of Agriculture and Forestry <b>within one month</b> from the date the permission is connected to the License or Plan.</p>

## 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The purpose of stakeholder identification is to determine and prioritise Project stakeholders for consultation and engagement. This SEP recognises a stakeholder as any individual or group who:

- are affected or likely to be affected by the Project (Project-Affected Parties), and
- may have an interest in the Project (Other Interested Parties).

As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.

Within the scope of this SEP, a list of the stakeholders identified for the Project is presented in Section 4.5 “Summary of Project Stakeholder Needs” Table 4-5.

The SEP is a living document, which is to be reviewed and updated by Zorlu Jeotermal as needed. The list of stakeholders will be updated and revised as part of the SEP update, if required.

### 4.1. Project-Affected Parties

There are several settlements that may be affected by the Project activities in the vicinity of the exploration wells. Exploration wells ZDM-2 and ZDM-3 are located in Asagidaloren Village of Diyadin district and ZDM-6 is located in Mollakara Village of Diyadin district.

The settlements in the vicinity of the exploration wells are listed in Table 2-2 with distances of the closest buildings within each settlement and their relative directions. The locations of the settlements are also shown in Figure 2-2. The population of Diyadin district was 38,369 in 2022 and the populations of the closest settlements are provided in Table 2-3.

The exploration studies will start at ZDM-3 well location, for which the land acquisition has already been completed by Zorlu Jeotermal.

As per the current data and assessment of Zorlu Jeotermal, prior to acquisition, the Parcel No. 102/25 (ZDM-3) was not being cultivated or used for economic purposes by the landowner or other formal or informal land users. There were no crops, trees, buildings/structures or water sources on the parcel. The parcel was used by the previous landowner himself for grazing purposes, who owns a couple of ovine and bovine animals. He does not depend on the acquired parcel (102/25) for this activity as there are other parcels in the area under his ownership (reportedly three parcels) and there are also alternative grazing areas in the settlement. He has household members (sons) earning income from construction works in metropolitan cities.

Based on the outcomes of the well tests at ZDM-3, the decision to continue with other well locations (for parcels 102/2 (legal entity – location of ZDM-2) and 102/12 (under Pasture Law – location of ZDM-6)) will be made. In that case, Zorlu Jeotermal will consider either lease of the land from the landowner(s) through execution of land lease agreements or purchase of the land on willing buyer-willing seller basis. Other necessary permissions for land use will be obtained from the relevant authorities.

As per the information provided by Zorlu Jeotermal, both ZDM-2 and ZDM-6 well locations are used for agricultural purposes sporadically for a limited period of the year as the lands in the area are not favorable for agriculture/cultivation due to the harsh weather conditions of Agri province<sup>4</sup>. Therefore, the lands in the area are generally used by the public for grazing purposes. There are no trees, buildings/structures or water sources on either well locations.

Regarding the access route to reach ZDM-3 well location, Parcel no. 102/25 (ZDM-3) is located next to an existing road.

The planned access routes for both ZDM-2 and ZDM-6 have been selected to follow the existing local roads to the extent possible with the objective of minimizing the land use and land take requirements. The available

<sup>4</sup> According to the Türkiye Annual Average Number of Snow Covered Days Analysis of MoEUCC Metrological Services in between years 1970-2022 (<https://mgm.gov.tr/FILES/resmi-istatistikler/parametreAnalizi/2022-ortalama-kar-ortulu.pdf>), the number of days with snow cover in Agri is 112-125, making Agri as one of the provinces with the highest number.

information provided by Zorlu Jeotermal regarding the parcels of access roads is detailed in ESMP Section 2.4 (“Planning for Access Routes”).

Once the decision to proceed with ZDM-2 and ZDM-6 is taken and the land acquisition process planned in detailed, the formal and informal users (for agriculture, animal husbandry, etc.) of the parcels to be affected, if any, will be identified through site surveys and consultations with users of the lands to be affected will be planned and carried out prior to land entry and mobilization to determine any potential social and economic impact.

The closest buildings to each drilling wells are shown in Table 2-2.

The landowners and/or the land users of the well locations and the access roads, the residents of the closest buildings to the well locations and the access roads, the landowners and/or land users of the neighboring parcels to the well locations and to the access roads are evaluated project affected parties.

**Table 4-1. Project Stakeholder Groups – Project Affected Parties**

Stakeholder Group		Definitive Stakeholders
1	Owners/shareholders of privately-owned parcels (ZDM-2 well location and on planned access roads of ZDM-2 and ZDM-6)	<ul style="list-style-type: none"> <li>Owners/shareholders of privately-owned parcels:  <u>ZDM-2</u> <ul style="list-style-type: none"> <li>Well location (Parcel No. 102/2)</li> <li>Privately-owned parcels neighboring the agricultural soil road to access ZDM-2</li> </ul> <u>ZDM-6</u> <ul style="list-style-type: none"> <li>Parcel No. 102/21</li> </ul> </li> </ul>
2	Formal or informal users of affected parcels from drilling activities and access routes	Formal or informal, <ul style="list-style-type: none"> <li>Agricultural users</li> <li>Users for grazing purposes</li> <li>Users for recreational purposes</li> <li>Users for other purposes</li> </ul> of; <ul style="list-style-type: none"> <li>ZDM-3 well location (Parcel No. 102/25)</li> <li>ZDM-2 well location (Parcel No. 102/2)</li> <li>ZDM-6 well location (Parcel No. 102/12)</li> <li>neighboring parcels of the existing agricultural soil road to access ZDM-2 well location, both private parcels and state-owned (non-registered) parcels</li> <li>parcels of which the planned access route to ZDM-6 well location passes through:               <ul style="list-style-type: none"> <li>Parcel No. 102/21</li> <li>Parcel No. 112/109</li> </ul> </li> </ul>
3	Local communities (including disadvantaged or vulnerable individuals/groups) that may be subject to E&S impacts of the Project in the following settlements: <ul style="list-style-type: none"> <li>Mutlu village</li> <li>Asagidaloren village</li> <li>Mollakara village</li> </ul>	<ul style="list-style-type: none"> <li>Mutlu village residents</li> <li>Asagidaloren village residents</li> <li>Mollakara village residents</li> </ul> Those affected parties may include but not be limited to the following: <ul style="list-style-type: none"> <li>Residents of the closest buildings/receptors to well locations and access roads</li> <li>Owners/shareholders and formal and/or informal users of neighboring parcels to well locations and access roads</li> </ul>
4	Other local community members (including disadvantaged or vulnerable individuals/groups):	<ul style="list-style-type: none"> <li>Mutlu village residents</li> <li>Asagidaloren village residents</li> <li>Mollakara village residents</li> </ul>



## 4.2. Other Interested Parties

Apart from the Project affected parties, there are also stakeholders who may have an interest in the Project due to its location, proximity to the natural resources or due to the sector the Project is involved in. Although these stakeholder groups may not be directly affected from the positive or negative impacts of the Project, they may have a role in the Project preparation stages such as permitting processes or may have an in-depth knowledge regarding the environmental and social characteristics of the area and nearby communities that can provide an insight to management of Project impacts. The identified Other Interested Parties are listed below.

**Table 4-2. Project Stakeholder Groups – Other Interested Parties**

Stakeholder Groups		Stakeholders Identified
1	National and Local Governmental Institutions	<u>National Governmental Institutions</u> <ul style="list-style-type: none"> <li>- Ministry of Environment, Urbanization and Climate Change</li> <li>- Ministry of Energy and Natural Resources <ul style="list-style-type: none"> <li>o Energy Market Regularity Authority (EPDK)</li> <li>o Mineral Research and Exploration General Directorate (MTA)</li> </ul> </li> <li>- Ministry of Agriculture and Forestry <ul style="list-style-type: none"> <li>o State Hydraulic Works (DSI)</li> </ul> </li> <li>- Ministry of Culture and Tourism</li> </ul> <u>Local Governmental Institutions</u> <ul style="list-style-type: none"> <li>- Governorate of Agri Province</li> <li>- Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>- Provincial Directorate of Agriculture and Forestry</li> <li>- Agri Special Provincial Administration Directorate of Real Estate and Expropriation</li> <li>- Agri Municipality</li> <li>- Diyadin District Governorate</li> <li>- Diyadin Municipality</li> <li>- District Gendarmerie</li> <li>- Local Police Force</li> </ul>
2	Local Respected Individuals <sup>5</sup>	<ul style="list-style-type: none"> <li>- Muftu and Imams</li> <li>- School directors, teachers</li> <li>- Hospital director, doctors</li> </ul>
3	Non-governmental organizations (NGOs) at National and Local Level	<ul style="list-style-type: none"> <li>- Türkiye Geothermal Association</li> <li>- Geothermal Energy Association</li> <li>- Geothermal Power Plant Investors Association (JESDER)</li> <li>- Diyadin and Its Villages Development Association</li> <li>- Diyadin Education, Culture and Assistance Association</li> <li>- Diyadin Geothermal Greenhouse Owners Association</li> <li>- Diyadin Women Entrepreneurs Association</li> <li>- Diyadin Youth Sports Club Association</li> <li>- Agri and Its Villages Improvement, Development, Social Assistance and Solidarity Association</li> <li>- Agri Development and Environment Association</li> <li>- Red Crescent Society of Türkiye Agri Branch</li> <li>- Green Crescent Society of Turkey Agri Branch</li> <li>- Union of Chambers of Tradesmen and Craftsmen Agri</li> <li>- Chamber of Commerce and Industry Agri</li> <li>- Chamber of Geology Engineers Agri</li> <li>- Chamber of Agriculture Agri</li> <li>- Breeding Sheep and Goat Breeders Association Agri</li> </ul>

<sup>5</sup> The closest school (Asagidaloren Primary School) is located in Asagidaloren village, 300 m northeast of ZDM-3, near Asagidaloren village center. The closest hospital is Diyadin State Hospital, which is located 14.5 km northeast of ZDM-3. These sensitive receptors in the vicinity of the well locations are shown in Section 4.9 ("Socio-Economy") of the Project ESMP.

Stakeholder Groups		Stakeholders Identified
		- Cattle Breeders Association Agri
4	Media	Local newspapers, local magazines, local TV channels etc.
5	Private Sector Companies, Local Businesses, Suppliers, Other Industrial Projects	<ul style="list-style-type: none"> <li>- Neighboring private company carrying out greenhouse activities.</li> <li>- Local Companies and Enterprises</li> <li>- Other Industrial Projects in the vicinity</li> </ul>
6	Academic Institutions / Educational Institutions	<ul style="list-style-type: none"> <li>- Agri Ibrahim Cecen University</li> <li>- Public schools</li> </ul>
7	RSM related Stakeholders <sup>6</sup>	<ul style="list-style-type: none"> <li>- Development and Investment Bank of Türkiye (TKYB)</li> <li>- International Bank for Reconstruction and Development (IBRD)</li> <li>- World Bank (WB)</li> <li>- RSM Unit</li> <li>- RSM Consultant</li> </ul>

<sup>6</sup> As per the RSM Geothermal Resource Validation Beneficiary Manual (April 2023), TKYB, through its Engineering Department, is the Project Implementation Agency for the RSM. TKYB's RSM Unit will be supported by a Technical Consultant for management and implementation of the RSM (RSM Consultant). The World Bank will be responsible for carrying out supervision of RSM implementation by TKYB.

### 4.3. Disadvantaged / Vulnerable Individuals or Groups

Disadvantaged or vulnerable individuals or groups are those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a Project's benefits. These individuals or groups are more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance.

To date, no disadvantaged or vulnerable individual or group affected by the Project activities has been identified.

By focusing engagement efforts on disadvantaged or vulnerable individuals or groups, the SEP will seek to achieve equity, promote inclusive participation and maximize the positive impacts of the Project on the livelihoods of these groups.

**Table 4-3. Project Stakeholder Groups – Disadvantaged and Vulnerable Individuals or Groups**

Stakeholder Groups	Potential Vulnerabilities
Disadvantaged or Vulnerable Individuals or Groups	<ul style="list-style-type: none"> <li>- Elderly people (over 65) in need of care</li> <li>- Disabled persons (physically or mentally)</li> <li>- Female head households and widowed or divorced women</li> <li>- Children and youth population of communities</li> <li>- Unemployed youth</li> <li>- Seasonal migrants</li> <li>- Shepherders</li> <li>- Disadvantaged or vulnerable individuals or groups that might be using the exploration well areas (ZDM-2, ZDM-3, and ZDM-6, including planned access road parcels) for livelihood activities such as agricultural, grazing, recreational, etc. purposes</li> </ul>

### 4.4. Internal Stakeholders

In addition to external stakeholders, there are internal Project stakeholders who play a vital role in the successful implementation of the Project. These internal stakeholders include project personnel, including direct and contracted employees, who are directly involved in the planning, execution, and monitoring of Project activities. Engagement and involvement of these internal stakeholders throughout the Project lifecycle is essential to foster collaboration, maintain project momentum, and ensure alignment with the Project's overall E&S goals and objectives.

**Table 4-4. Project Stakeholder Groups – Internal Stakeholders**

Stakeholder Groups	Stakeholders Identified
Zorlu Enerji	<ul style="list-style-type: none"> <li>- Management team at the headquarters</li> <li>- E&amp;S team at the headquarters (Corporate Sustainability Department)</li> </ul>
Zorlu Jeotermal <sup>7</sup>	<ul style="list-style-type: none"> <li>- Management team at the headquarters</li> <li>- E&amp;S team at the headquarters</li> <li>- Project employees at the site (including direct and contracted employees)</li> <li>- Contractors and subcontractors and their employees</li> </ul>

<sup>7</sup> Zorlu Jeotermal was established in June 2008 as one of the indirect subsidiaries of Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji).



#### 4.5. Summary of Project Stakeholder Needs

Table 4-5 provides the list of Project stakeholder groups and summary of their specific needs and interests to the Project.

**Table 4-5. Summary of Project Stakeholder Needs and Interests to the Project**

Stakeholder Group	Definitive Stakeholders	Specific Interests/Relevance and Stakeholder Needs
<b>Project Affected Parties</b>		
<b>Owners/shareholders of privately-owned parcels (ZDM-2 well location and on planned access routes of ZDM-2 and ZDM-6)</b>	<ul style="list-style-type: none"> <li>Owners/shareholders of privately-owned parcels <u>ZDM-2</u> <ul style="list-style-type: none"> <li>Well location (Parcel No. 102/2)</li> <li>Privately-owned parcels neighboring the agricultural soil road to access ZDM-2</li> </ul> </li> <li><u>ZDM-6</u> <ul style="list-style-type: none"> <li>Parcel No. 102/21</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The exploration studies will start at ZDM-3 well location which is owned by Zorlu Jeotermal. Based on the outcome of the well tests the decision to continue with ZDM-2 and ZDM-6 well locations will be made.</li> <li>For ZDM-2, the well location is owned by a legal entity and the planned access route passes between the parcels through an already existing agricultural soil road. For ZDM-6, the existing agricultural soil road planned passes through the boundaries of privately-owned Parcel No. 102/21.</li> <li>For management of potential livelihood impacts, mutual agreements will be executed for the privately-owned parcels through consent letters with the owner(s)/shareholder(s) for temporary use of land for site access.</li> </ul>
<b>Formal or informal users of affected parcels from drilling activities and access routes</b>	<p>Formal or informal,</p> <ul style="list-style-type: none"> <li>Agricultural users</li> <li>Users for grazing purposes</li> <li>Users for recreational purposes</li> <li>Users for other purposes</li> </ul> <p>of;</p> <ul style="list-style-type: none"> <li>ZDM-3 well location (Parcel No. 102/25)</li> <li>ZDM-2 well location (Parcel No. 102/2)</li> <li>ZDM-6 well location (Parcel No. 102/12)</li> <li>neighboring parcels of the existing agricultural soil road to access ZDM-2 well location, both private parcels and state-owned (non-registered) parcels</li> <li>parcels of which the planned access route to ZDM-6 well location passes through: <ul style="list-style-type: none"> <li>Parcel No. 102/21</li> <li>Parcel No. 112/109</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>No reported formal and informal use of the parcels. If any such use of the parcels is identified, identification and management of impacts will be made.</li> </ul>

Stakeholder Group	Definitive Stakeholders	Specific Interests/Relevance and Stakeholder Needs
<b>Local communities (including disadvantaged or vulnerable individuals/groups) that may be subject to E&amp;S impacts of the Project in the following settlements:</b> <ul style="list-style-type: none"> <li>- Mutlu village</li> <li>- Asagidaloren village</li> <li>- Mollakara village</li> </ul>	<ul style="list-style-type: none"> <li>- Mutlu village residents</li> <li>- Asagidaloren village residents</li> <li>- Mollakara village residents</li> </ul> <p>Those affected parties may include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>- Residents of the closest buildings/receptors to well locations and access roads</li> <li>- Owners/shareholders and formal and/or informal users of neighboring parcels to well locations and access roads</li> </ul>	<ul style="list-style-type: none"> <li>- Management of direct E&amp;S impacts</li> <li>- Cooperation to maximize benefits and planning for local employment and the procurement of goods and services</li> <li>- Planning of social responsibility / social development projects (for consideration as part of potential future energy investments)</li> </ul>
<b>Other local community members (including disadvantaged or vulnerable individuals/groups):</b>	<ul style="list-style-type: none"> <li>- Mutlu village residents</li> <li>- Asagidaloren village residents</li> <li>- Mollakara village residents</li> </ul>	<ul style="list-style-type: none"> <li>- Management of indirect E&amp;S impacts</li> <li>- Cooperation to maximize benefits and planning for local employment and the procurement of goods and services</li> <li>- Planning of social responsibility / social development projects (for consideration as part of potential future energy investments)</li> </ul>
<b>Other Interested Parties</b>		
<b>National Governmental Institutions</b>	<ul style="list-style-type: none"> <li>- Ministry of Environment, Urbanization and Climate Change</li> <li>- Ministry of Agriculture and Forestry <ul style="list-style-type: none"> <li>o State Hydraulic Works (DSI)</li> </ul> </li> <li>- Ministry of Energy and Natural Resources <ul style="list-style-type: none"> <li>o Energy Market Regularity Authority (EPDK)</li> <li>o Mineral Research and Exploration General Directorate (MTA)</li> </ul> </li> <li>- Ministry of Culture and Tourism</li> </ul>	<ul style="list-style-type: none"> <li>- National and regional planning and development</li> <li>- Project-related permitting processes</li> <li>- Policy formulation</li> <li>- Management of cumulative Impacts</li> </ul>
<b>Local Governmental Institutions</b>	<ul style="list-style-type: none"> <li>- Governorate of Agri Province <ul style="list-style-type: none"> <li>o Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>o Provincial Directorate of Agriculture and Forestry</li> </ul> </li> <li>- Agri Special Provincial Administration Directorate of Real Estate and Expropriation</li> <li>- Agri Municipality</li> <li>- Diyadin District Governorate</li> <li>- Diyadin Municipality</li> </ul>	<ul style="list-style-type: none"> <li>- Project-related permitting processes</li> <li>- Coordination of project activities and processes</li> <li>- Collaboration for management and monitoring of environmental impacts (waste, wastewater)</li> <li>- Emergency preparedness and coordination</li> <li>- Planning of social responsibility / planning of social development projects (for consideration as part of potential future energy investments)</li> </ul>

Stakeholder Group	Definitive Stakeholders	Specific Interests/Relevance and Stakeholder Needs
	<ul style="list-style-type: none"> <li>- District Gendarmerie</li> <li>- Local Police Force</li> </ul>	
<b>Local Respected Individuals</b>	<ul style="list-style-type: none"> <li>- Muftu and Imams</li> <li>- School Directors, teachers</li> <li>- Hospital Director, Doctors</li> </ul>	<ul style="list-style-type: none"> <li>- Management of E&amp;S impacts</li> <li>- Planning appropriate and differentiated stakeholder engagement methods and activities (e.g. for women, disadvantaged or vulnerable individuals, etc.)</li> <li>- Cooperation to maximize benefits and planning for local employment and the supply of goods and services</li> <li>- Planning of social responsibility / planning of social development projects (for consideration as part of potential future energy investments)</li> </ul>
<b>Non-Governmental Organizations (NGOs) at National and Local Level</b>	<ul style="list-style-type: none"> <li>- Türkiye Geothermal Association</li> <li>- Geothermal Energy Association</li> <li>- Geothermal Power Plant Investors Association (JESDER)</li> <li>- Diyardin and Its Villages Development Association</li> <li>- Diyardin Education, Culture and Assistance Association</li> <li>- Diyardin Geothermal Greenhouse Owners Association</li> <li>- Diyardin Women Entrepreneurs Association</li> <li>- Diyardin Youth Sports Club Association</li> <li>- Agri and Its Villages Improvement, Development, Social Assistance and Solidarity Association</li> <li>- Agri Development and Environment Association</li> <li>- Red Crescent Society of Türkiye Agri Branch</li> <li>- Green Crescent Society of Turkey Agri Branch</li> <li>- Union of Chambers of Tradesmen and Craftsmen Agri</li> <li>- Chamber of Commerce and Industry Agri</li> <li>- Chamber of Geology Engineers Agri</li> <li>- Chamber of Agriculture Agri</li> <li>- Breeding Sheep and Goat Breeders Association Agri</li> <li>- Cattle Breeders Association Agri</li> </ul>	<ul style="list-style-type: none"> <li>- Management of E&amp;S impacts</li> <li>- Management of cumulative impacts</li> </ul>
<b>Media</b>	<ul style="list-style-type: none"> <li>- Local newspapers, local magazines, local TV channels etc.</li> </ul>	<ul style="list-style-type: none"> <li>- Project information sharing with stakeholders</li> <li>- Advertisements</li> </ul>
<b>Private Sector Companies, Local Businesses, Suppliers, Other Industrial Projects</b>	<ul style="list-style-type: none"> <li>- Neighboring private company carrying out greenhouse activities.</li> <li>- Local Companies and Enterprises</li> </ul>	<ul style="list-style-type: none"> <li>- Procurement of goods and services related to the project</li> <li>- Coordination of infrastructure services</li> <li>- Management of cumulative impacts</li> </ul>



Stakeholder Group	Definitive Stakeholders	Specific Interests/Relevance and Stakeholder Needs
	- Other Industrial Projects in the vicinity	
<b>Academic Institutions / Educational Institutions</b>	- Agri Ibrahim Cecen University - Public schools	- Technical consultancy - Corporate Social Responsibility activities
<b>RSM related Stakeholders<sup>8</sup></b>	- Development and Investment Bank of Türkiye (TKYB) - International Bank for Reconstruction and Development (IBRD) - World Bank (WB) - RSM Unit - RSM Consultant	- Project finance - E&S risk assessment, management and monitoring
<b>Disadvantaged or Vulnerable Individuals or Groups</b>		
<b>Disadvantaged or Vulnerable Individuals or Groups</b>	- Elderly people (over 65) in need of care - Disabled persons (physically or mentally) - Female head households and widowed or divorced women - Children and youth population of communities - Unemployed youth - Seasonal migrants - Shepherders - Disadvantaged or vulnerable individuals or groups that might be using the exploration well areas (ZDM-2, ZDM-3, and ZDM-6, including planned access road parcels) for livelihood activities such as agricultural, grazing, recreational, etc. purposes	- To date, no disadvantaged or vulnerable individual or group affected by the Project activities has been identified.  - Ensuring that vulnerable and disadvantaged individuals/groups have access to sufficient information about the Project, ensuring that these individuals/groups benefit equally from the Project
<b>Internal Stakeholders</b>		
<b>Zorlu Enerji</b>	- Management team at the headquarters - E&S team at the headquarters (Sustainability Department)	- Reputation with regard to E&S performance of the Project - Business growth and shareholder value
<b>Zorlu Jeotermal<sup>9</sup></b>	- Management team at the headquarters - E&S team at the headquarters	- Growth and development - E&S risk management

<sup>8</sup> As per the RSM Geothermal Resource Validation Beneficiary Manual (April 2023), TKYB, through its Engineering Department, is the Project Implementation Agency for the RSM. TKYB's RSM Unit will be supported by a Technical Consultant for management and implementation of the RSM (RSM Consultant). The World Bank will be responsible for carrying out supervision of RSM implementation by TKYB.

<sup>9</sup> Zorlu Jeotermal was established in June 2008 as one of the indirect subsidiaries of Zorlu Enerji Elektrik Üretim A.Ş. (Zorlu Enerji).

Stakeholder Group	Definitive Stakeholders	Specific Interests/Relevance and Stakeholder Needs
	<ul style="list-style-type: none"> <li>- Project employees at the site (including direct and contracted employees)</li> <li>- Contractors and subcontractors and their employees</li> </ul>	<ul style="list-style-type: none"> <li>- Employment opportunity</li> <li>- Occupational H&amp;S</li> </ul>

## 5. STAKEHOLDER ENGAGEMENT PROGRAM

Zorlu Jeotermal will assess the effectiveness of the stakeholder engagement strategies presented in this SEP and, if necessary, make necessary adjustments to enhance stakeholder participation.

Zorlu Jeotermal will implement the SEP throughout the Project duration and the SEP will be updated as necessary.

### 5.1. Purpose and Timing of Stakeholder Engagement Program

To ensure effective and meaningful engagement with different stakeholder groups (external and internal stakeholders), Zorlu Jeotermal will use various appropriate methods of information disclosure and communication throughout the Project, as summarised in the Stakeholder Engagement Programme presented in Table 5-1.

Throughout the Project duration, Zorlu Jeotermal will consult with the Project affected parties and other interested parties regarding the Project's E&S impacts and will take their views into account.



Table 5-1. Stakeholder Engagement Strategy and Program for the Project

Target Stakeholders	Purpose of Engagement	Information to be Disclosed and Documents/Materials to be Used for Engagement	Engagement Methods Proposed	Location	Responsible Party	Timetable for Implementation and Frequency
<b>Related national and local governmental institutions</b>	<ul style="list-style-type: none"> <li>To consult with the authorities on permitting, environmental, occupational and community H&amp;S management, collaboration mechanisms for emergency preparedness and response, community development</li> <li>To provide up-to-date information on the Project status and current activities</li> </ul>	<ul style="list-style-type: none"> <li>Any specific documentation required by the authorities</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings</li> <li>Official written correspondences with the authorities</li> <li>E-mail correspondence or other means preferred by the authorities</li> </ul>	<ul style="list-style-type: none"> <li>Ankara province (for general directorates)</li> <li>Agri province (for provincial directorates)</li> <li>Diyadin district</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Sustainability Department</li> <li>Team Leader/Project Coordinator</li> </ul>	<p>At least one-off prior to start of Project mobilization</p> <p>As required throughout the Project</p>
<b>Heads (mukhtars) of the local settlements:</b> <ul style="list-style-type: none"> <li>Mutlu Village</li> <li>Asagidaloren Village</li> <li>Mollakara Village</li> </ul>	<ul style="list-style-type: none"> <li>To provide/exchange up-to-date information on the Project status and current activities, potential E&amp;S impacts of the Project activities, Project ESMP, community H&amp;S management, emergency preparedness and response, planned stakeholder engagement events, employment and procurement opportunities, etc. in a timely, transparent, understandable, and efficient manner.</li> <li>To collect feedback, grievances, suggestions and comments related with the Project and current activities on an on-going basis.</li> </ul>	<ul style="list-style-type: none"> <li>ESMP and SEP</li> <li>Non-technical presentations, Project maps etc.</li> <li>Brochures containing brief Project information and grievance mechanism</li> <li>Information on the communication channels related to submittal of the grievances and their management.</li> <li>Grievance forms and guidance</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder engagement meeting (to be held in a selected settlement prior to finalization of ESMP and SEP)</li> <li>Regular or on-demand face to face meetings with Mukhtars at their offices, public places or Project site offices, as appropriate</li> <li>Non-technical presentations</li> <li>Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women</li> <li>ESMP, SEP and project brochures placed at mukhtars' offices and other locations in the village where public could reach and review.</li> <li>ESMP and SEP will be disclosed before and after consultations at <ul style="list-style-type: none"> <li>Zorlu Enerji's website</li> <li>TKYB's website.</li> <li>WB's website</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Mukhtars' offices or other public or private places (e.g. mosques, teahouses and places commonly visited by women) at the affected villages</li> <li>Project site offices</li> </ul>	<ul style="list-style-type: none"> <li>Team Leader/Project Coordinator</li> <li>ESHS Representative or any member appointed by the Team Leader to liaise with the mukhtars</li> </ul>	<p>At least one-off prior to start of Project mobilization</p> <p>Afterwards for the duration of the Project, on an as needed basis for consultation and information sharing purposes</p> <p>Upon receipt of any grievance (Grievances will be checked by ESHS Representative on a weekly basis as part of grievance management)</p>
<b>Owners/shareholders of privately-owned parcels (ZDM-2 well location and on access road to ZDM-2 and ZDM-6)</b> <p><u>ZDM-2</u></p> <ul style="list-style-type: none"> <li>Well location (Parcel No. 102/2)</li> <li>Privately-owned parcels neighbouring the agricultural soil road to access ZDM-2</li> </ul> <p><u>ZDM-6</u></p> <ul style="list-style-type: none"> <li>Parcel No. 102/21</li> </ul>	<ul style="list-style-type: none"> <li>Execution of mutual agreements through consent letters with the owners/shareholders for temporary use of land for site access.</li> </ul>	<ul style="list-style-type: none"> <li>Consent letters received before land use and after reinstatement of the land in the case of rent.</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder engagement meeting (to be held in a selected settlement prior to finalization of ESMP and SEP)</li> <li>Face to face meetings</li> </ul>	<ul style="list-style-type: none"> <li>Project site office</li> <li>Settlement/village of the parcel owner</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Procurement Team</li> <li>Team Leader/Project Coordinator</li> <li>ESHS Representative</li> </ul>	<p>After the decision to proceed with ZDM-2 and ZDM-6 wells is taken, prior to land entry and mobilization</p>
<b>Formal or informal users of affected parcels from drilling activities and access routes</b> <p>Formal or informal,</p> <ul style="list-style-type: none"> <li>Agricultural users</li> <li>Users for grazing purposes</li> <li>Users for recreational purposes</li> <li>Users for other purposes</li> </ul> <p>of;</p> <ul style="list-style-type: none"> <li>ZDM-3 well location (Parcel No. 102/25)</li> </ul>	<ul style="list-style-type: none"> <li>To provide/exchange up-to-date information on the Project status and current activities, potential E&amp;S impacts of the Project activities, Project ESMP, community H&amp;S management, emergency preparedness and response, special measures considered/developed for women and vulnerable people etc. in a timely,</li> </ul>	<ul style="list-style-type: none"> <li>ESMP and SEP</li> <li>Non-technical presentations, Project maps etc.</li> <li>Brochures containing brief Project information and grievance mechanism</li> <li>Information on the communication channels related to submittal of the grievances</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder engagement meeting (to be held in a selected settlement prior to finalization of ESMP and SEP)</li> <li>Non-technical presentations</li> <li>Face to face meetings</li> <li>Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women</li> </ul>	<ul style="list-style-type: none"> <li>Mutlu Village</li> <li>Asagidaloren Village</li> <li>Mollakara Village</li> <li>Public or private places where women would feel comfortable to engage with the Project team</li> </ul>	<ul style="list-style-type: none"> <li>Team Leader/Project Coordinator</li> <li>ESHS Representative</li> </ul>	<p>At least one-off prior to start of Project mobilization</p> <p>Afterwards, for the duration of the Project, on an as needed basis for consultation and information sharing purposes</p> <p>Upon receipt of any grievance (Grievances will be checked by</p>

Target Stakeholders	Purpose of Engagement	Information to be Disclosed and Documents/Materials to be Used for Engagement	Engagement Methods Proposed	Location	Responsible Party	Timetable for Implementation and Frequency
<ul style="list-style-type: none"> <li>- ZDM-2 well location (Parcel No. 102/2)</li> <li>- ZDM-6 well location (Parcel No. 102/12)</li> <li>- neighboring parcels of the existing agricultural soil road to access ZDM-2 well location, both private parcels and state-owned (non-registered) parcels:</li> <li>- parcels of which the planned access route to ZDM-6 well location passes through: <ul style="list-style-type: none"> <li>▪ Parcel No. 102/21</li> <li>▪ Parcel No. 112/109</li> </ul> </li> </ul>	<p>transparent, understandable, and efficient manner.</p> <ul style="list-style-type: none"> <li>• To develop measures to compensate any economic losses in consultation with the users as necessary.</li> <li>• To collect feedback, grievances, suggestions and comments related with the Project and current activities on an on-going basis.</li> </ul>		<ul style="list-style-type: none"> <li>• ESMP, SEP and project brochures placed at mukhtars' offices and other locations in the village where public could reach and review.</li> <li>• ESMP and SEP will be disclosed before and after consultations at <ul style="list-style-type: none"> <li>○ Zorlu Enerji's website</li> <li>○ TKYB's website.</li> <li>○ WB's website</li> </ul> </li> </ul>			ESHS Representative on a weekly basis as part of the grievance mechanism)
<p><b>Local communities (including disadvantaged or vulnerable individuals/groups) that may be subject to E&amp;S impacts of the Project in the following settlements:</b></p> <ul style="list-style-type: none"> <li>• Mutlu village</li> <li>• Asagidaloren village</li> <li>• Mollakara village</li> </ul> <p>Those affected parties may include but not be limited to the following:</p> <ul style="list-style-type: none"> <li>• Residents of the closest buildings to well locations and access roads</li> <li>• Owners/shareholders and formal and/or informal users of neighboring parcels to well locations and access roads</li> </ul>	<ul style="list-style-type: none"> <li>• To provide/exchange up-to-date information on the Project status and current activities, potential E&amp;S impacts of the Project activities, Project ESMP, community H&amp;S management, emergency preparedness and response, special measures considered/ developed for women and vulnerable people etc. in a timely, transparent, understandable, and efficient manner.</li> <li>• To collect feedback, grievances, suggestions and comments related with the Project and current activities on an on-going basis.</li> </ul>	<ul style="list-style-type: none"> <li>• ESMP and SEP</li> <li>• Non-technical presentations, Project maps etc.</li> <li>• Brochures containing brief Project information and grievance mechanism</li> <li>• Information on the communication channels related to submittal of the grievances</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder engagement meeting (to be held in a selected settlement prior to finalization of ESMP and SEP)</li> <li>• Non-technical presentations</li> <li>• Face to face meetings</li> <li>• Focus group discussions/ separate informative meetings</li> <li>• Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women</li> <li>• ESMP, SEP and project brochures placed at mukhtars' offices and other locations in the village where public could reach and review.</li> <li>• ESMP and SEP will be disclosed before and after consultations at <ul style="list-style-type: none"> <li>○ Zorlu Enerji's website</li> <li>○ TKYB's website.</li> <li>○ WB's website</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Mutlu Village</li> <li>• Asagidaloren Village</li> <li>• Mollakara Village</li> <li>• Public or private places where women would feel comfortable to engage with the Project team</li> </ul>	<ul style="list-style-type: none"> <li>• Team Leader/Project Coordinator</li> <li>• ESHS Representative</li> <li>• For engagement with women and disadvantaged or vulnerable individuals support from Corporate Sustainability Team might be required to manage potential sensitivities</li> </ul>	<p>At least one-off prior to start of Project mobilization</p> <p>Afterwards, for the duration of the Project, on an as needed basis for consultation and information sharing purposes</p> <p>Upon receipt of any grievance (Grievances will be checked by ESHS Representative on a weekly basis as part of grievance mechanism)</p>
<p><b>Other interested local community members (including disadvantaged or vulnerable individuals/groups):</b></p> <ul style="list-style-type: none"> <li>• Mutlu village residents</li> <li>• Asagidaloren village residents</li> <li>• Mollakara village residents</li> </ul>	<ul style="list-style-type: none"> <li>• To provide/exchange up-to-date information on the Project status and current activities, potential E&amp;S impacts of the Project activities, Project ESMP, community H&amp;S management, emergency preparedness and response, special measures considered/ developed for women and vulnerable people etc. in a timely, transparent, understandable, and efficient manner.</li> <li>• To collect feedback, grievances, suggestions and comments related with the Project and current activities on an on-going basis.</li> </ul>	<ul style="list-style-type: none"> <li>• ESMP and SEP</li> <li>• Non-technical presentations, Project maps etc.</li> <li>• Brochures containing brief Project information and grievance mechanism</li> <li>• Information on the communication channels related to submittal of the grievances</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder engagement meeting (to be held in a selected settlement prior to finalization of ESMP and SEP)</li> <li>• Non-technical presentations</li> <li>• Face to face meetings</li> <li>• Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women</li> <li>• Checking grievances on weekly basis and managing as per the timescales defined in SEP.ESMP, SEP and project brochures placed at mukhtars' offices and other locations in the village where public could reach and review.</li> <li>• ESMP and SEP will be disclosed before and after consultations at <ul style="list-style-type: none"> <li>○ Zorlu Enerji's website</li> <li>○ TKYB's website.</li> <li>○ WB's website</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Mutlu Village</li> <li>• Asagidaloren Village</li> <li>• Mollakara Village</li> <li>• Public or private places where women would feel comfortable to engage with the Project team</li> </ul>	<ul style="list-style-type: none"> <li>• Team Leader/Project Coordinator</li> <li>• ESHS Representative</li> <li>• For engagement with women and disadvantaged or vulnerable individuals support from Corporate Sustainability Team might be required to manage potential sensitivities</li> </ul>	<p>For the duration of the Project, on an as needed basis for consultation and information sharing purposes</p> <p>Upon receipt of any grievance (Grievances will be checked by ESHS Representative on a weekly basis as part of grievance mechanism)</p>

Target Stakeholders	Purpose of Engagement	Information to be Disclosed and Documents/Materials to be Used for Engagement	Engagement Methods Proposed	Location	Responsible Party	Timetable for Implementation and Frequency
<b>Local businesses</b>	<ul style="list-style-type: none"> <li>To share/exchange information on local procurement and service provisions requirements and opportunities</li> </ul>	<ul style="list-style-type: none"> <li>Information related to required goods and services</li> </ul>	<ul style="list-style-type: none"> <li>Face to face meetings with the local businesses in the region</li> <li>E-mail correspondences</li> <li>Telephone calls</li> </ul>	<ul style="list-style-type: none"> <li>Diyadin district</li> <li>Surrounding settlements</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Procurement Team</li> <li>Team Leader/Project Coordinator</li> <li>Team Leader/Project Coordinator or any member appointed by the Team Leader to liaise with local businesses</li> </ul>	As required for the duration of the Project
<b>NGOs and universities</b>	<ul style="list-style-type: none"> <li>To respond to specific questions regarding the Project</li> </ul>	<ul style="list-style-type: none"> <li>Information on the specific questions regarding the Project</li> </ul>	<ul style="list-style-type: none"> <li>Face to face meetings</li> <li>E-mail correspondences</li> <li>Telephone calls</li> </ul>	<ul style="list-style-type: none"> <li>Location to be determined</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Technical and Sustainability Departments (based on the specific questions to be received)</li> </ul>	As required on demand
<b>Media</b>	<ul style="list-style-type: none"> <li>To convey public Project information to wider interested parties in a timely, transparent, and efficient manner</li> </ul>	<ul style="list-style-type: none"> <li>Visual materials/ advertisements related to key Project information (may be specially designed depending on public concerns, if there is any)</li> <li>Video/audio records</li> </ul>	<ul style="list-style-type: none"> <li>Sharing visual materials to be published with local and national media agencies</li> </ul>	<ul style="list-style-type: none"> <li>Internet</li> <li>Newspapers</li> <li>Television</li> <li>Radio</li> <li>Zorlu Enerji's website</li> </ul>	<ul style="list-style-type: none"> <li>Corporate teams in charge of media relations</li> </ul>	As required on demand
<b>Neighbouring Greenhouse Owner (Private Sector Company) and other Project developers in the vicinity (e.g. energy, geothermal and other sectors)</b>	<ul style="list-style-type: none"> <li>To exchange information/ideas about local employment, local procurement, baseline E&amp;S data, community development opportunities, etc.</li> <li>To collaborate for the management of cumulative impacts</li> </ul>	<ul style="list-style-type: none"> <li>Data, reports, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Face to face meetings</li> <li>E-mail correspondences</li> <li>Telephone calls</li> </ul>	<ul style="list-style-type: none"> <li>Projects within 1 km radius</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Sustainability Department</li> <li>Team Leader/Project Coordinator</li> </ul>	As required on demand
<b>RSM related Stakeholders</b>	<ul style="list-style-type: none"> <li>To inform/update the RSM related stakeholders about Project's E&amp;S Performance</li> <li>To fulfil the requirements of WB</li> </ul>	<ul style="list-style-type: none"> <li>Monthly reporting to RSM Unit</li> <li>Summary of monitoring results</li> </ul>	<ul style="list-style-type: none"> <li>Face to face meetings</li> <li>E-mail correspondences</li> <li>Telephone calls</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Corporate office</li> <li>Project site office</li> <li>Other locations as required</li> </ul>	<ul style="list-style-type: none"> <li>Senior Project Management/ Management team at the headquarters</li> <li>Corporate Sustainability Department</li> <li>Team Leader/Project Coordinator</li> <li>ESHS Representative</li> </ul>	<p>Continuous email exchange and meetings</p> <p>E&amp;S reporting to RSM Unit on a monthly basis</p>
<b>Internal Stakeholders (including direct and contracted employees)</b>	<ul style="list-style-type: none"> <li>To share information on the overall Project technical and E&amp;S progress</li> <li>Ensure successful implementation of the Project SEP</li> <li>To share information on the Project including but not limited to workers' rights, working conditions, occupational H&amp;S requirements, Project ESMP with direct and contracted employees at the site.</li> </ul>	<ul style="list-style-type: none"> <li>ESMP and SEP</li> <li>Employee contracts</li> <li>Code of Ethics of Zorlu Enerji and other Corporate E&amp;S Procedures</li> <li>E&amp;S management plans and procedures</li> <li>Company bulletin boards</li> <li>Announcements related to H&amp;S</li> <li>Grievance forms and guidance</li> <li>Training materials/presentations</li> </ul>	<ul style="list-style-type: none"> <li>Sharing relevant written documentation with the Project employees at the time of hiring</li> <li>Induction/orientation trainings, job-specific trainings (quarterly for refreshment), training on ESMP and SEP, toolbox trainings</li> <li>ESMP, SEP and project brochures placed at the project site office</li> <li>ESMP and SEP will be disclosed before and after consultations at <ul style="list-style-type: none"> <li>Zorlu Enerji's website</li> <li>TKYB's website.</li> <li>WB's website</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Corporate office</li> <li>Project site office</li> </ul>	<ul style="list-style-type: none"> <li>Senior Project Management/ Management team at the headquarters</li> <li>Corporate Sustainability Department</li> <li>Corporate HR Department</li> </ul>	At frequencies specified for each engagement method proposed





## 5.2. Proposed Strategy for Information Disclosure

Zorlu Jeotermal will disclose Project information to ensure all Project stakeholders have a comprehensive understanding of the potential risks, impacts and opportunities associated with the Project.

Information to be disclosed and documents/materials to be used for engagement, engagement methods and the location and frequencies for information disclosure with each stakeholder group are defined in Table 5-1.

As part of the proposed strategy for information disclosure, Zorlu Jeotermal is committed to fostering open and transparent communication with its stakeholders. The contact details of Zorlu Jeotermal are provided in Section 10 of this SEP.

## 5.3. Proposed Strategy for Consultation

After the draft final versions of ESMP and SEP are approved by the RSM Unit, they will be disclosed to public on Beneficiary's webpage (in Turkish) and consulted with the stakeholders through a stakeholder engagement meeting to be held in Asagidaloren village.

The meeting will be publicly announced at minimum 10 calendar days before the meeting date. Project-affected stakeholders will be directly contacted and invited by the Beneficiary representatives. Mukhtars of the Project-affected settlements will be separately informed about the meeting. Posters including information on the meeting will be posted in public places, such as mukhtars' offices, mosques, coffee houses, etc., for visibility purposes. Public announcement methods will also be used for informing the public about the meeting's purpose, date, time and place.

All such invitations will be documented, including evidence such as signed confirmations from mukhtars for posters displayed in their offices and photographs. Relevant documentation will be submitted to the RSM Unit. A Project brochure (in Turkish) will be developed, including a brief description of the Project with clear maps and/or layouts indicating the lands to be used by the Project, grievance mechanism and Project contact details. Project brochures will be made available at mukhtars' offices and will also be distributed to attendees during the stakeholder engagement meeting. The Project brochure, along with the draft final versions of the ESMP and SEP, will be disclosed on Beneficiary's webpage. Documentation of this disclosure will be submitted to the RSM Unit. The relevant webpage link will be included in the Project brochure, posters and all invitation materials.

After the meeting aiming for broad participation has been held, the Beneficiary will revise the draft final versions of the ESMP and SEP to incorporate public comments and concerns. Information about the stakeholder engagement meeting will be documented using the form given in Beneficiary Manual – Annex 12E as provided in Annex A.

Once the information on and outcomes from the stakeholder engagement meeting information are integrated into the ESMP and SEP, the revised draft final versions will be submitted to the RSM Unit for approval. After the RSM Unit approves the documents, they will be considered and recorded as final. The final versions of the ESMP and SEP will then be disclosed on the Beneficiary's web page.

All disclosed documents will comply with personal privacy rights, ensuring that any personal information related to land acquisition, etc. is kept confidential and not disclosed to the public.

The stakeholder engagement meeting will be planned and undertaken in consultation of the RSM Unit. Before sending out the invitations to the relevant stakeholders, the Beneficiary will submit its planning of the process in a documented format to the RSM Unit for approval.

The proposed strategy and engagement methods for consultation with each stakeholder group are presented in Table 5-1.

For meaningful consultations with the Project-affected parties and other interested parties, relevant material such as non-technical presentations, project maps, and brochures containing brief project information and grievance mechanism (in Turkish) will be provided in a timely manner prior to consultation and during the project lifetime as defined in the Stakeholder Engagement Program and in a form and language that are understandable and accessible to the groups being consulted.

Turkish version of the ESMP and SEP will be available at public places (e.g. muhtar's offices and other public places such as mosques, teahouses and places commonly visited by women at the affected settlements).

The minutes of consultation meetings will be recorded as per the table of contents provided in Annex A of this SEP.

During the consultation meetings, local stakeholders will also be informed about the methodology of land acquisition including information on the overall methodology of the land acquisition and timeframes envisaged for the land acquisition processes.

Project affected stakeholders will also be consulted in the event of significant changes to the Project which may result in additional risks or impacts.

#### **5.4. Proposed Strategy to Incorporate the View of Vulnerable Groups**

In order to ensure the meaningful participation of disadvantaged or vulnerable individuals/groups during the consultation and information disclosure processes, several measures will be implemented to remove obstacles and promote their engagement.

Separate mechanisms will be established specifically tailored to cater the needs and perspectives of these individuals/groups. These will include targeted outreach efforts to actively seek their input, such as conducting specific consultations with each disadvantaged or vulnerable group in locations that are easily accessible to them. Separate informative meetings if required will be conducted to address their specific concerns. The proposed engagement methods with local communities including disadvantaged or vulnerable individuals/groups are presented in Table 5-1.

Zorlu Jeotermal aims to create an inclusive and participatory consultation process that actively incorporates the views, needs, and concerns of disadvantaged or vulnerable individuals/groups as well as women to take these into account throughout the Project duration.

Team Leader/Project Coordinator will be the main person in charge of liaison with vulnerable groups. This said, for engagement with women and disadvantaged or vulnerable individuals, support from Corporate Sustainability Team might be required to manage potential sensitivities and ensure a smooth engagement process and to promote and maximize participation of women in consultation and engagement processes.

#### **5.5. Timelines**

The proposed timelines and frequencies for engagement with all identified stakeholder groups are provided in Table 5-1. Any comments and feedback received from Project stakeholders will be registered as per the grievance mechanism developed and presented in this SEP. The timelines for reporting back to stakeholder groups is presented in Section 7 of this SEP.

#### **5.6. Review of Comments**

All stakeholder comments and feedback (written and verbal) will be collected through various channels available to all stakeholder groups throughout the Project and will be kept in the External Grievances and Feedback Register as presented in Annex E of this SEP.

Written comments will be collected through Zorlu Enerji's website or through grievance forms that will be made available at the local level. Verbal comments will be gathered through the consultation meetings, face-to-face individual or group meetings. Zorlu Jeotermal will report back to stakeholders to provide information on how their comments were taken into account.

The contact details of Zorlu Jeotermal are provided in Chapter 10 of this SEP.

#### **5.7. Future Phases of Project**

Zorlu Jeotermal will implement its commitment to stakeholder engagement, transparency, and responsiveness. By maintaining open lines of communication, addressing concerns, and incorporating stakeholder feedback, Zorlu Jeotermal aims to foster a collaborative and mutually beneficial relationship with all stakeholders throughout the entire duration of the Project.

Zorlu Jeotermal will consult with the Project affected parties and other related and interested stakeholders regarding the environmental and social impacts and aspects of the Project will continue to foster open lines of communication with the stakeholders ensuring their comments and feedbacks are continuously addressed. Zorlu Jeotermal is committed to keeping all Project stakeholder well-informed regarding the Project activities, developments and progress.

Information disclosure and engagement with the stakeholder groups including disadvantaged or vulnerable individuals or groups will continue throughout the Project duration with face-to-face meetings as stated in Table 5-1.

Zorlu Jeotermal will ensure that all stakeholder engagement activities will be registered in the Project Stakeholder Engagement Log (see Annex B for sample Stakeholder Engagement Log). Zorlu Jeotermal will report back to stakeholders to provide information on how their comments were taken into account.



## 6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 6.1. Resources

The implementation of this SEP requires resources to effectively manage and carry out stakeholder engagement activities. The Team Leader/Project Coordinator of the Project will be the main responsible person to ensure successful implementation of this SEP and the Project grievance mechanism through direct involvement and assigning site personnel to SEP-related responsibilities.

This said, for engagement with Project stakeholders, support from Corporate Sustainability Team might be required to manage potential sensitivities and ensure a smooth engagement process and to promote and maximize participation of all affected individuals/groups in consultation and engagement processes.

An adequate budget will be allocated to support the Project's stakeholder engagement activities. This budget will cover various aspects, such as organizing consultation meetings, maintaining communication channels with the stakeholders and ensuring necessary resources are available for effective stakeholder engagement.

### 6.2. Management Functions and Responsibilities

The SEP-related responsibilities of the Team Leader/Project Coordinator and the site personnel to be assigned (with SEP-related responsibilities) will be:

- Coordinate and oversee the implementation of SEP.
- Engage with the local communities in line with the SEP as detailed in Table 5-1.
- Support the management of internal and external grievances by planning and implementing technical and administrative measures as required.
- Ensure grievances are registered and responded as per the SEP.
- Report to Corporate Sustainability Department regarding the grievances received from the communities and their management in line with SEP.
- Report to the Corporate Sustainability Department on Project's social performance and key social issues.

The Corporate Sustainability Department will also play an active role in stakeholder engagement, providing guidance, support, and decision-making as needed. They will review grievances and corrective actions periodically and receive regular reports on the Project's SEP implementation performance.

Throughout the Project duration, the stakeholder engagement processes and activities, grievances, feedbacks and comments received and progress on the corrective actions will be documented, tracked and managed through stakeholder engagement and grievance/comment databases.

## 7. GRIEVANCE MECHANISM

Zorlu Jeotermal will establish an external (public) grievance mechanism for all stakeholders and also an internal grievance mechanism will be established to address Project's internal stakeholders such as direct and contracted workers. These mechanisms will be designed to be accessible, transparent, and culturally sensitive, allowing individuals from all stakeholder groups to express their grievances or seek redress in a safe and supportive environment.

The grievance mechanism will not prevent access to judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. The grievance mechanism will be free, open and accessible to all stakeholders. Comments and grievances will be addressed in a fair and transparent manner. The key elements of a grievance mechanism are highlighted below:

- The process is transparent, impartial and confidential
- Staff and management are informed and aware
- Concerns are addressed promptly
- Records are kept
- The mechanism is sensitive to the needs of all workers, including vulnerable groups
- Role of worker representatives
- Access to judicial remedy

Zorlu Enerji has a Public Grievance Mechanism of which people affected by the projects and/or operations of Zorlu Enerji can bring their grievances or comments for consideration and redress.

The corporate website of Zorlu Enerji includes a communication form/box<sup>10</sup>, which can be filled digitally and also includes the following corporate Company communication information<sup>11</sup> for public.

- Adress: Levent 199, Büyükdere Caddesi, No:199 34394 Şişli - İSTANBUL
- Tel: +90 212 456 23 00

### 7.1. External (Public) Grievance Mechanism

The External (Public) Grievance Mechanism established for the Project will be implemented for the duration of the Project.

The key principles of the grievance mechanism for external stakeholders are as follows:

- To address concerns promptly and effectively, in a transparent manner that is culturally appropriate, free from manipulation, interference, coercion, intimidation and retribution, and readily accessible to all affected parties, at no cost;
- To ensure handling of grievances in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the stakeholders' needs and concerns
- The mechanism will not prevent access to judicial or administrative remedies

The main steps of the External (Public) Grievance Mechanism are presented in Figure 7-1 and given in Table 7-1. A separate grievance mechanism will be made available to all Project personnel, including direct and contracted employees (see Section 7.27.2). Sample grievance form and grievance closeout forms are provided in Annex C and Annex D, respectively.

<sup>10</sup> <https://www.zorluenerji.com.tr/en/contact/contact-form>

<sup>11</sup> <https://www.zorluenerji.com.tr/en/contact/contact-details>

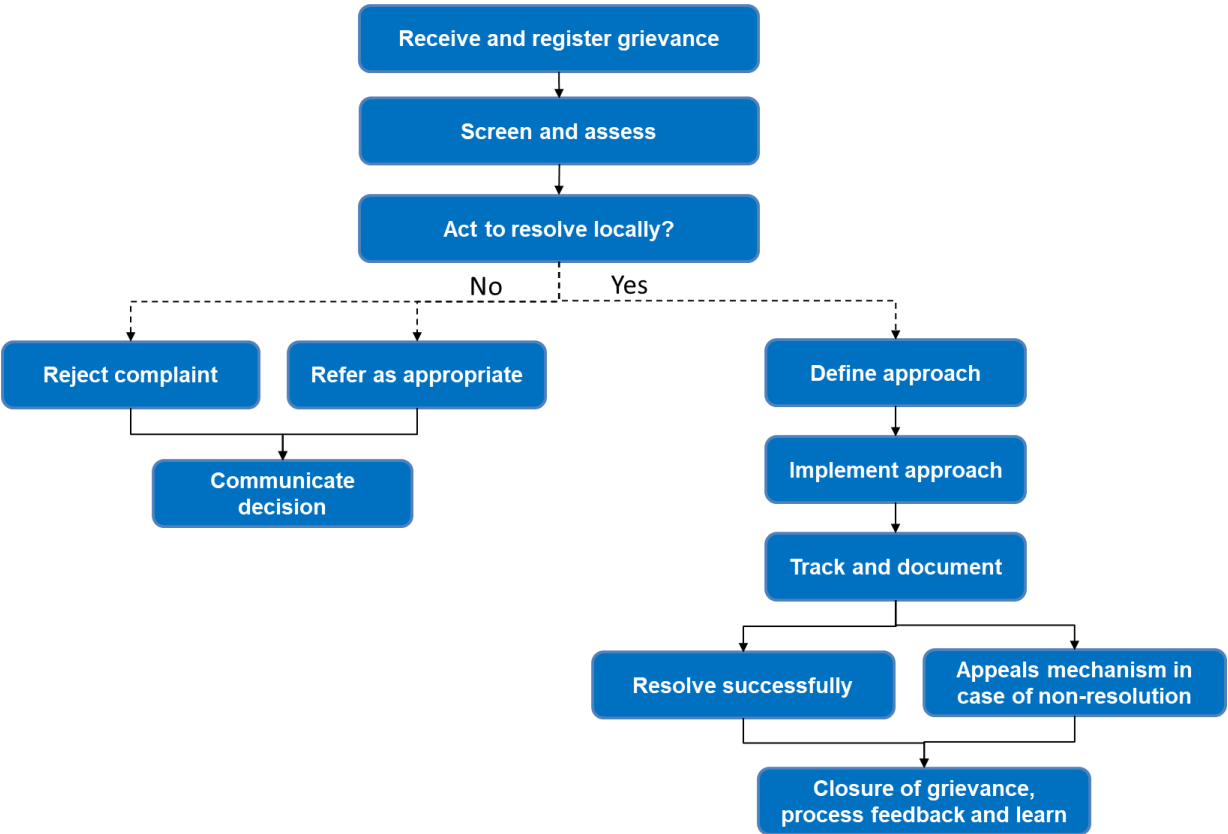


Figure 7-1. External (Public) Grievance Mechanism

Table 7-1. Steps of External (Public) Grievance Mechanism

Step	Description of Activities
<b>Step 1 – Receive and register grievances, acknowledge receipt of grievance</b>	<p>Any person or organization may send comments, complaints and/or requests for information through the following methods by using the contact information provided in Section 10.</p> <ul style="list-style-type: none"> <li>Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. Team Leader/Project Coordinator). For grievances/comments received orally in person, the Project representatives will request the grievance/comment holder to fill the form himself/herself by providing required guidance, where necessary. If the grievance/comment holder wishes the form to be filled out by the Project representatives, they will fill the form on behalf of the grievance/comment holder. In such cases, the grievance/comment holder will be required to read the filled form and both the grievance/comment holder and the Project representative who filled the form will be required to approve and sign the form. The Project representative will provide a copy of the filled form to the grievance/comment holder stakeholder.</li> <li>Grievance boxes and forms (see Annex C for sample Grievance Form) to be placed at the Project site office, at public places including places commonly/comfortably visited by women. A guidance note (signed by a Project representative) will be posted next to the grievance boxes to guide the grievance/comment holders on how to fill the form. This guidance will specify that all sections of the grievance/comment form should be filled out by the grievance/comment holder.</li> <li>Grievances/feedback can be submitted anonymously if preferred by the grievance/feedback holder, though that will mean that feedback cannot be provided to the grievant. If the grievance/comment holder would like to fill the form anonymously, the form will allow the grievance/comment holder to file it without any personal contact information.</li> <li>Telephone (the contact numbers that can be used to submit grievances/comments) will be shared with the local communities in due course)</li> <li>E-mail (the e-mail address for the submittal of grievances/comments will be shared with the local communities in due course)</li> <li>Website</li> </ul> <p>Team Leader/Project Coordinator will ensure that the grievance/comment forms are collected from the grievance/comment boxes on a weekly basis.</p> <p>Within maximum 3 days (at the same day whenever possible) of collecting/receiving the form (from the boxes or in person), Project team will record the form in the grievance/comments database and initiate the evaluation process (see Annex E for sample External Grievance and Feedback Register).</p> <p>The contact information for submission of grievances will also be clearly indicated on Zorlu Enerji's website or a dedicated website to be developed for the Project, at muhtar's offices of local communities and at the Project site office.</p>



Step	Description of Activities
	<p>A grievance will be formally acknowledged through a personal meeting, phone call, e-mail or letter as appropriate within 3 days from submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the grievance/comment holder at this time.</p>
<b>Step 2 – Screen and assess</b>	<p>In the first instance grievances will be assessed by the Team Leader/Project Coordinator, who will consult other relevant units/departments as necessary.</p> <p>Team Leader/Project Coordinator or any assigned Project team member will upload the original copy of the grievance/comment form and his/her pre-assessment into the grievance/comments. In addition, all other related documents and visuals (photos, videos etc.) will be added to the database. In the pre-assessment, the following issues in collaboration with concerned units whenever needed will be evaluated:</p> <ul style="list-style-type: none"> <li>• its priority degree (considering the dynamics of the Project site/location among the other grievance/comment launched);</li> <li>• the action items to be followed to solve the grievance;</li> <li>• if applicable its approximate cost;</li> <li>• the opinion of the highest-ranking local authority (e.g. village/neighbourhood muhtar)</li> </ul> <p>Team Leader/Project Coordinator will support Corporate Sustainability Department in deciding who should deal with the grievance and determine whether additional support is necessary.</p> <p>Grievances/comments submitted through the Zorlu Enerji's website or from a dedicated website to be developed for the Project (the grievance/comment form presented in Annex C will be adapted and uploaded to a designated Project website and kept in the public domain throughout the Project) will be checked and coordinated by designated members of the Corporate Sustainability Department. They will also be transmitted to Team Leader/Project Coordinator within 2 calendar days for site records.</p>
<b>Step 3 – Act to resolve internally/locally</b>	<p>The Corporate Sustainability Department, with the aid of Team leader/Project Coordinator, will decide which grievances should be responded to internally and which fall outside of Zorlu Jeotermal's jurisdiction.</p> <p>If the grievance is to be dealt with internally, the Corporate Sustainability Department will formally delegate the handling of the grievance to the relevant department/ personnel/contractor within 2 calendar days for development of an appropriate response.</p>
<b>Step 4a – Reject complaint / Refer to as appropriate</b>	<p>If it is decided that a grievance is not valid or does not fall under Zorlu Jeotermal's jurisdiction, Project team will notify the complainant within 10 working days from receipt of the grievance.</p>
<b>Step 4b – Define approach</b>	<p>A response will be developed by the delegated team and Team Leader/Project Coordinator the Grievance Closeout Form will be prepared (see Annex D for Sample Grievance Closeout Form).</p> <p>For complex grievances, a conflict resolution committee can also be established (to include top management, other departments, contractors and external consultants if required).</p>

Step	Description of Activities
<b>Step 5 – Implement approach</b>	<p>Required actions will be implemented by the related departments to deal with the issue. All grievances will be responded to within 30 working days from submission. The aim is to solve it as quickly and effectively as possible. In case of delay, complainants will be notified about the reasons for the delay and the expected timing for when their grievance will be addressed.</p> <p>Completion of actions will be recorded in the Grievance Register (see Annex E).</p> <p>The response will be signed by the appropriate manager. This will include both a signature of the Grievance Register or in correspondence (which will then be filed with the grievance to indicate agreement and referenced in the Register).</p>
<b>Step 6 – Track of document</b>	<p>All comments and complaints will be responded to either orally or in writing, in accordance with the preferred method of communication specified by the complainant.</p> <p>Team Leader/Project Coordinator or a Project team member assigned by the Team Leader will be responsible for undertaking this communication.</p>
<b>Step 7 – Take action</b>	Resolution and appeal processes will be processed as below.
<b>Step 7a – Resolve successfully</b>	The agreed actions for resolution of grievances will be implemented by the responsible departments.
<b>Step 7b – Appeals mechanism in case of non-resolution</b>	<p>If actions taken on a grievance are not resolved to the satisfaction of the complainant, Zorlu Jeotermal will consider and as necessary initiate an appeals mechanism. The objective of this mechanism will be to review responses being shared with external stakeholders in an attempt to resolve non-judicial disputes arising out of various matters related to the Project.</p> <p>The following parties may be resorted to act as independent mediators under the appeals mechanism as appropriate depending on the type and subject of the grievance:</p> <ul style="list-style-type: none"> <li>- Representatives from local administrations</li> <li>- Heads of the affected settlements</li> <li>- Independent technical experts (e.g. agricultural experts, soil experts, etc.)</li> </ul> <p>Having this mechanism in place, stakeholders may still further pursue external remedies, including legal action, in accordance with the existing legislation of Türkiye as the Project Grievance Mechanism will not prevent access to judicial or administrative remedies.</p>
<b>Step 8 – Closure of grievance, process feedback and learn</b>	<p>Any further response from the complainant will be recorded to help assess whether the grievance is closed or whether further action is required.</p> <p>Team Leader/Project Coordinator will use appropriate communication channels to confirm whether the complainant has understood and is satisfied with the response. This communication will also be recorded in the Grievance Register.</p> <p>Finally, Team leader/Project Coordinator will determine whether the grievance can be closed or whether further attention and action is required.</p>

## 7.2. Grievance Mechanism for Internal Stakeholders (Employees)

The Internal Grievance Mechanism will be provided to all direct and contracted workers to raise workplace concerns. All workers will be informed of the grievance mechanism at the time of recruitment and the measures will be put in place to protect them against any reprisal for its use.

This internal grievance mechanism will be proportionate to the nature and scale and the potential risks and impacts of the project. It will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner.

The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The internal grievance mechanism to be provided for the internal stakeholders is presented below:

- Internal stakeholders can initiate the grievance/comment mechanism by using the following methods:
  - Grievance/comment boxes and forms (located at the Project site office)
  - E-mail
  - Telephone
  - Petition
  - Verbally (directly or through Team Leader/Project Coordinator, site chiefs, etc.)
- While filing the grievance/comment, the workers will have an option for anonymous filing.
- The grievances/comments received by the site personnel (e.g. contractor) will be transmitted to the Team Leader/Project Coordinator or a Project personnel appointed by the Team Leader for recording.
- After being recorded, the grievance/comment will be transmitted to the Corporate Human Resources (HR) Department within three (3) days. The Corporate HR Department will coordinate with the relevant unit/department for the management/resolution of the grievance.
- A database of all internal grievances/comments received through different channels will be kept by the Corporate HR Department.
- Upon saving of the grievance, its appendices and HR Department's opinion in the database, grievance/comment holder will be informed by appropriate methods (e.g. e-mail, telephone) within three (3) days of receiving the grievance, indicating that the request has been taken into consideration. The information to be given will include the proposed feedback time, if possible.
- The concerned unit/department will provide the Corporate HR Department with their evaluation and suggestions for the resolution of the respective grievance/comment in writing on the grievance/comment form, within seven (7) days after being contacted by the HR Department.
- HR Department will prepare the draft response and submit it to the approval of the Senior Management Team (at the headquarters), as appropriate. The Senior Management Team will decide on the content of the response and approve it within 14 days of receiving grievance.
- The written response will be transmitted to the applicant/complainant by the HR Department within maximum 30 days of receiving grievance/comment.
- Following the response, grievance/comment database is updated depending on the acceptance of the resolution by the applicant/complainant.

Contractors/subcontractors will be responsible for providing their personnel with access to the grievance mechanism defined in this SEP, collect the grievances/comments accordingly, inform the Zorlu Jeotermal's Team Leader/Project Coordinator immediately upon receipt and take the actions for the management/resolution of the grievance with approval from the Team Leader/Project Coordinator.

## 8. MONITORING AND REPORTING

### 8.1. Involvement of Stakeholders in Monitoring Activities

The Project does not consider involvement of third parties in monitoring the Project or impacts associated with the Project. If such a need arises during the Project implementation, requirements as set out in World Bank's Good Practice Note on Third-Party Monitoring will be adhered to.

Stakeholder comments and feedback to be received from Project-affected communities will be taken into account in managing and mitigating Project impacts during Project implementation.

### 8.2. Reporting Back to Stakeholder Groups

The Project activities and overall progress and the E&S performance, including SEP implementation and grievance/feedback management, will be communicated to the stakeholders to keep affected communities informed about the Project and the progress as provided in Table 5-1.

If the Project activities change or new E&S risks emerge, the stakeholders will be communicated outside of the regular schedule to discuss these changes through communication channels as outlined in the SEP.

The SEP will be updated as necessary, during the course of the Project implementation. Zorlu Jeotermal will record all incoming grievances in the corporate grievance/comment database (see Annex E).

Zorlu Jeotermal will prepare monthly E&S Monitoring Reports for the RMS Unit where all technical, environmental and social issues will be included. As part of this reporting to RMS Unit, Project's performance on SEP implementation and internal SEP monitoring will also be covered. These E&S Monitoring Reports prepared by Zorlu Jeotermal will be sent to TKYB<sup>12</sup>.

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<sup>12</sup> RSM has been assigned as Category FI (Financial Intermediary) in accordance with WB safeguard policy OP/ BP/GP 4.0 since TKYB has been assigned as FI for using WB loan proceeds. The E&S Monitoring Reports will be sent by Zorlu Jeotermal to the FI, and FI is responsible for sharing them with the WB.



## 9. ALTERNATIVE APPROACHES AND MECHANISMS FOR ENGAGING STAKEHOLDERS IN THE CONTEXT OF CORONAVIRUS PANDEMIC<sup>13</sup>

### 9.1. Design of an Interim Stakeholder Engagement Process

In the context of the coronavirus pandemic, it is crucial to develop alternative approaches and mechanisms for engaging stakeholders in a safe and effective manner. The Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19 (May 2020) emphasizes the need for a robust interim stakeholder engagement process and grievance mechanism that ensures proactive communication and information sharing while considering the health and safety of all parties involved.

As of June 2023, there are currently no COVID-19 related restrictions in place in Türkiye that would hinder stakeholder engagement. The government has not imposed any specific limitations, and there are no travel or access restrictions affecting engagement activities.

However, it is worth considering that stakeholders may have their own preferences regarding the mode of engagement in light of the post-pandemic circumstances. In this evolving landscape, stakeholders might opt for remote communication and virtual interactions as a preferred mode of engagement.

Possible COVID-19 Impacts on Engagement with stakeholders and safe engagement methods are presented in Table 9-1.

**Table 9-1. Alternative Approaches and Mechanisms for Engaging Stakeholder in the Context of Coronavirus Pandemic**

Possible COVID-19 Impacts on Engagement and related Activities	Safe Stakeholder Engagement	Information Disclosure	Grievance Mechanism
Discontinuation of engagement activities with affected parties such as, <ul style="list-style-type: none"> <li>• suspension of in-person meetings including consultation and information disclosure meetings</li> <li>• limited access to communities or stakeholders due to travel restrictions or lockdown measures</li> <li>• reduced participation in engagement activities due to health and safety concerns</li> <li>• delays in community consultations or public hearings</li> </ul>	Engagement with stakeholders through virtual meetings such as video conferencing platforms, audio options, online surveys, or teleconferences	Project updates and relevant information shared through secure online platforms, website, email newsletters or social media channels	Dedicated email address, via online communication form/box provided at the website and via phone for grievance receipt and resolution.

<sup>13</sup> IFC INTERIM ADVICE FOR IFC CLIENTS ON SAFE STAKEHOLDER ENGAGEMENT IN THE CONTEXT OF COVID-19 ([https://www.ifc.org/wps/wcm/connect/30258731-0e7d-4cb2-863ca6fb4c6d0d95/Tip+Sheet\\_Interim+Advice\\_StakeholderEngagement\\_COVID19\\_May2020.pdf?MOD=AJPERES&CVID=n9s.b9a](https://www.ifc.org/wps/wcm/connect/30258731-0e7d-4cb2-863ca6fb4c6d0d95/Tip+Sheet_Interim+Advice_StakeholderEngagement_COVID19_May2020.pdf?MOD=AJPERES&CVID=n9s.b9a))

## 9.2. Alternative Approaches to Engagement

Zorlu Jeotermal will ensure that alternative approaches are adopted for stakeholder engagement, if required in conditions such as COVID-19 pandemic. In this regard, prior to virtual engagement and remote participation processes, Zorlu Jeotermal will identify the essential stakeholder activities including coordination with local government and health authorities, regular communication of any delays in environmental and social assessment or mitigation implementation, resettlement processes, and grievance mechanism.

For these stakeholder activities, virtual and remote alternatives that best meet the objectives of the planned activities will be considered.

Factors such as access to and quality of connectivity of the stakeholders and options for stakeholder to access the grievance mechanism to protect complainants' anonymity (if preferred) will be analysed and based on these considerations, a program with diversified set of communication tools and formats will be tailored.

**Table 9-2. Virtual and Nonvirtual Communication Channels**

Online Communication Channels – Information Dissemination	Online Communication Channels Stakeholder Engagement	Non-electronic Communication Channels	Specific Considerations for Vulnerable and Marginalized Groups
<p>Zorlu Enerji's website or developing a dedicated Project website for the Project, providing a secure grievance portal for logging, tracking and communicating directly with the grievance/feedback holders and complainants.</p> <p>Digital platforms, social media and messaging platforms (a Project Facebook page can be developed if required),</p>	<p>Online stakeholder engagement meetings</p> <p>Seeking feedback via phone, e-mails and forms of dedicated Project website</p>	<p>Headwoman/headmen (mukhtars) of the local settlements and local respected individuals</p> <p>Public announcements through local media agencies</p> <p>Information packages including brochures, booklets, posters, flyers, maps developed for the Project and placed at suitable locations at settlements</p>	<p>Tailored engagement (language, cultural and accessibility barriers factors).</p> <p>Accessible format such as print material in large fonts,</p> <p>Communication channels accessible to vulnerable stakeholders to enable participation and raise grievances (such as a trusted local focal point).</p>

## 10. CONTACT INFORMATION FOR THE STAKEHOLDERS

For any comments, feedbacks and grievances related to the Project, the stakeholders can use the following Project contact information provided in Table 10-1. The corporate website of Zorlu Enerji also includes a communication form/box for stakeholder grievances and comments (please see Section 7).

**Table 10-1. Project Contact Information**

<b>Zorlu Enerji Website</b>	<a href="https://www.zorluenerji.com.tr/tr/iletisim/iletisim-bilgileri">https://www.zorluenerji.com.tr/tr/iletisim/iletisim-bilgileri</a>
<b>Zorlu Enerji Headquarter</b>	Address: Levent 199, Büyükdere Caddesi, No:199 34394 Şişli - İSTANBUL Tel: +90 212 456 23 00
<b>Drilling Contractor</b>	To be announced upon contract
<b>Project Site Office</b>	Address: Tel:
<b>Contact Information of Site Representative</b>	Contact information will further be provided prior to start of the engagement activities.

## ANNEXES

### Annex A – Table of Contents for the Public Consultation Documentation

- Manner in which notification of the consultation was announced: media(s) used, date(s), description or copy of the announcement,
- Date(s) consultation(s) was (were) held,
- Location(s) consultation(s) was (were) held,
- Who was invited,
- Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office),
- Who attended,
- Name, Organization or Occupation, Telephone/Fax/e-mail number/address, (home and/or office),
- Meeting Program/Schedule,
- What is to be presented and by whom,
- Summary Meeting Minutes (Comments, Questions and Response by Presenters),
- List of decisions reached, and any actions agreed upon with schedules, deadlines and responsibilities.

## Annex B – Stakeholder Engagement Log

[illegible]



## Annex C – Sample Grievance Form

(to be translated into Turkish before start of Project mobilisation)

Grievance Form	
<b>Reference No:</b>	
<b>Full Name (*)</b> (*) Optional – if a grievance is recorded as anonymous, no reply will be provided.	
<b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>	
[ ] mail: .....	
[ ] telephone: .....	
[ ] e-mail: .....	
<b>Province/District/Settlement</b>	
<b>Date</b>	
<b>Grievance lodged (please underline as appropriate): in person, by phone, at community meeting, by mail, by email, other (please describe) .....</b>	
<b>Category of Grievance</b>	
1. On abandonment (public housing)	
2. On assets/properties impacted by the project	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (ex. pollution)	
6. On employment	
7. On traffic, transportation, and other risks	
8. Other (Please specify):	
<b>Date of Inquiry/Incident/Grievance</b>	
One time incident/grievance (date _____)	
Happened more than once (how many times? ( _____ ))	
On-going (currently experiencing problem)	
<b>Description of the Grievance</b>	
What did happen? When did it happen? Where did it happen? What is the result of the problem?	

**What would you like to see happen to resolve the problem?**

**Signature:**

**Date:**

## Annex D – Sample Grievance Closeout Form

(to be translated into Turkish before start of Project mobilisation)

Grievance Closeout Form		
Grievance Closeout Number:		
Define immediate action required:		
Define long-term action required (if necessary):		
Compensation Required?	[ ] Yes	[ ] No
Control of the Remediate Action and the Decision		
Stages of the Remediate Action		Deadline and Responsible Institutions
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
Compensation and Final Stages		
This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.		
Notes:		
Name-Surname and Signature of the Complainant:		
Date.../.../.....		
Title-Name-Surname of the Representative of the Responsible Institution/Company:		
Date.../.../.....		

Stakeholder Engagement Plan September 2024