



ANTALYA ALANYA  
OTOYOLU

# ANTALYA-ALANYA MOTORWAY PROJECT

STAKEHOLDER  
ENGAGEMENT PLAN

APRIL 2025

## ANNEX-2 STAKEHOLDER ENGAGEMENT PLAN

### 1 INTRODUCTION

This Stakeholder Engagement Plan (“the Plan” or “SEP”) has been prepared by ENCON Environmental Consultancy Co. (Consultant) for Antalya-Alanya Motorway Project (the “Project or AAMP”) in Türkiye.

Ministry of Transport, and Infrastructure (former Ministry of Transport, Maritime Affairs and Communications), General Directorate of Highways (“KGM” or “the Administration”), as the owner of the Antalya-Alanya Motorway Project, has tendered for a contract in May 2010 in accordance with the Law on Implementation of Some of the Investments and Services in the Framework of Build, Operate and Transfer Model (Law No: 3996). As a result of the tendering process, KGM has awarded Limak (the Project Sponsor) with a Build, Operate and Transfer (BOT) contract for the implementation of the Project. In this regard, Limak is referred as Project Sponsor in the scope of the plan, and in the ESIA studies.

In accordance with the provisions of the BOT contract, the Project encompasses financing, planning/design, construction, operation, maintenance, and all repair works throughout the operation period, including the transfer of the Motorway to the KGM at the end of the contract period. It is also expected that at the end of the contract period, the Motorway will be handed over to KGM free of any debt or obligation, in a well-maintained and operational condition, without any charges. The Project Sponsor's rights to operate maintain, and repair the Motorway will expire at the end of the contract period specified in the BOT contract.

Stakeholder engagement is the basis for establishing sustainable, constructive, and responsive relationships that are essential for successfully managing a project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a various external stakeholders thought the duration of the project. Initiating the engagement process in the early phases of the project helps ensure timely public access to all relevant information. It provides the stakeholders with an opportunity to input into the project design and the assessment of impacts.

The SEP should be easy to understand and straightforward. Its primary focus should be describing the project and identifying the stakeholders involved. It is crucial to determine the information available to the public and where it can be accessed. The SEP must also explain how the public can share their views and opinions, provide a deadline for requirements, and outline how individuals will be notified about any new information or opportunities for feedback or comments. The plan also aims to establish a project-based structure and approach to prevent Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) throughout the project's entire lifecycle. SEP will be designed to enable the Project Sponsor, Contractor Company, affected local communities, and all other stakeholders to identify and establish an effective engagement strategy.

#### 1.1 Purpose and the Scope of the Stakeholder Engagement Plan

The SEP is a public document which presents plans for stakeholder engagement, information disclosure and consultation. This Plan is valid for the both construction and operation phase of the Project.

SEP covers the following aspects:

- Applicable national and international regulations and IFC requirements on stakeholder engagement, particularly IFC PS1;
- Project plans to engage with stakeholders during the operation phase of the Project;
- Key Project stakeholders that will be identified and will be interacted with;
- Strategy for consultation and information disclosure;
- Timetable for various stakeholder engagement activities;



- Resources and responsibilities for the implementation of the SEP;
- Means of monitoring and reporting on consultation and disclosure activities; and
- A grievance mechanism for stakeholders and the public to raise concerns, provide feedback and comments about the Project operations and how complaints/comments will be handled.

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts. Stakeholder engagement process helps to:

- Identify the stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify their particular interests and requirements related to the Project;
- Generate a good understanding of the Project among those that will be affected;
- Identify issues early in the Project cycle that may pose risks to the Project or its stakeholders;
- Provide to these groups opportunities to voice their concerns and opinions;
- Define a consultation approach for stakeholders in relation to operation of the Project;
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process;
- Ensure that mitigation measures are appropriate (implementable, effective and efficient);
- Ensure that adequate and timely information is provided to those potentially affected by a project;
- Ensure a technically and culturally appropriate approach to engagement with all key stakeholders;
- Establish a system for long-term communication between the Project and communities that is of benefit to all parties.
- Identify resources and responsibilities for implementation and monitoring of the consultation program; and
- Set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The ultimate purpose of this SEP is 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 environmental and social impacts. The SEP is the responsibility of Project Sponsor and Project Sponsor is fully committed to undertaking necessary engagement activities in a manner that is consistent with international standards and national legislation as outlined in next sections.

The SEP encompasses planned stakeholder consultation activities and the process of stakeholder engagement. The SEP is prepared in compliance with IFC Performance Standards and international requirements and best practices, in addition to Turkish legislation.

## 2 PROJECT DESCRIPTION

According to the current design, total length of the Motorway, including the main carriageway and the access roads, is 127 km.

The Project (Antalya-Alanya Motorway Project) is one of the two sub-projects that constitute the Afyonkarahisar-Alanya Motorway Project and is designed to connect Serik and Alanya districts through Manavgat district of Antalya province. The project aims to improve transportation services and connectivity to surrounding provinces such as Burdur, Muğla, Konya, Isparta, Karaman, and Mersin. As of July 2024, the motorway is designed to be 127 kilometers long and will mainly consist of three lanes, with some sections having two lanes (3x2 and 2x2) in each direction.

Figure 2.1 presents the current design of Antalya-Alanya Motorway Project's route.

The current Project design includes a total of 117.8 km of road, comprising 84 kilometers of main road (motorway) and 33.8 kilometers of access roads (see Table 2.1).

**Table 2.1 Antalya-Alanya Motorway Sections in the scope of the Project**

| Project                 | Start and End Locations of the Section (Km) |              | Length of the Road (Km) |              |         |
|-------------------------|---|--------------|-------------------------|--------------|---------|
|                         | Start Location                              | End Location | Main Road (Motorway)    | Access Roads | Total   |
| Antalya-Alanya Motorway | Km 52+000                                   | Km 136+000   | 84+000                  | 33+800       | 117+800 |





Figure 2.1 The Route of the Antalya-Alanya Motorway Project



### 3 PUBLIC CONSULTATION/STAKEHOLDER ENGAGEMENT REQUIREMENTS

Implementation of the Project will follow the framework laws and regulations of the Republic of Türkiye as well as applicable international standard, IFC requirements. In this context, stakeholder engagement activities will conform to relevant IFC Performance Standards (i.e. IFC PS1) Equator Principles 4 (EPFI 5 Stakeholder Engagement, Principle 6 Grievance Mechanism and EU Directives).

Further details of the relevant Turkish legislation and applicable international requirements are provided in the following sections.

#### 3.1 National Regulations and Requirements

Under Article 10, Environmental Law sets out the general scope of the Environmental Impact Assessment (EIA) procedure in Türkiye, indicating that institutions, agencies and establishments that lead to environmental problems as a result of their planned activities are obliged to prepare environmental impact assessment report or Project Information File. Based on this legal framework, the EIA Regulation was put into force for the first time after being published in the Official Gazette numbered 21489 and dated on February 7, 1993. Since then there had been several amendments in the first regulation and new EIA regulations were published in 2008, 2013 and 2014 repealing the former regulations in force. The latest EIA Regulation (2022 EIA Regulation) has been published in the Official Gazette dated 29.07.2022 and numbered 31907, which repealed the 2014 EIA Regulation.

Under its annexes, the EIA Regulation categorizes investments as projects subject to full EIA (Annex-1) and projects subject to screening-elimination criteria (Annex-2). This categorization is done based on the type of activity and/or plant capacity. If the planned investment is defined as an activity under Annex-1 of the EIA Regulation, a full EIA Report is required. For Annex-2 activities, first a Project Information File is prepared in accordance with a limited format specified in the Annex-4 of the EIA Regulation and the MoEUCC evaluates the need for a full EIA process for the project.

The categorization for motorway projects under Turkish EIA regulation is done according to the type or length of the road (km) as follows:

- Full EIA process is required for the following Annex-1 activities;
  - Highways and state motorways (Article 9-c).
- Limited EIA process is required to be conducted for the following Annex-2 activities;
  - Facilities with a production capacity of 5 tons/hour and above, producing shaped materials using cement or other binding materials (Article 18-c),
  - Asphalt plants (Article 22),
  - Provincial roads and ring roads (except neighborhood/village roads; Article 28-d),
  - Addition of tunnels to highways or railways (Article 28-e).

The Project's EIA Report had been prepared in March 2016, submitted to the MoEUCC, reviewed by the evaluation committee and EIA Positive decision had issued in June 2018. In accordance with the EIA legislation in force on the date when the Project EIA Positive Decision was given (2014 EIA Regulation), the EIA Report of the Project has the vested right of upholding its EIA Positive Decision validity for 7 years before the start of the construction works for the Project.

In accordance with the related article, it is the legal responsibility of a project owner to organize an official Public Consultation Meeting for the projects that are included in Annex 1 of the Regulation (as the case in the EU EIA Directive).

As a result, Project Sponsor aims to develop a communication plan to inform relevant stakeholders about the Project activities in operation phase in line with this SEP.

Turkish national policy on protection of environment, cultural heritage and conservation of biological resources has been constituted on the base of relevant international agreements that Türkiye has signed or ratified.

- **Freedom of Thought and Opinion** (Part 2, Fundamental Rights and Duty- Article 25)  
Everyone has the right to freedom of thought and opinion and should not be compelled to reveal or be blamed for them.

- **Freedom of Expression and Dissemination of Thought** (Part 2, Fundamental Rights and Duty- Article 26)  
Everyone has the right to express and share their thoughts and opinions through speech, writing, pictures, or other media, individually or collectively, and to receive and communicate information and ideas freely without interference from official authorities.

- **Right of Petition, Right to Information, and Appeal to the Ombudsperson** (Part 2, Fundamental Rights and Duty- Article 74)  
Citizens and foreign residents can submit their requests and complaints in writing to the authorities and the Turkish Grand National Assembly based on the principle of reciprocity.

Other main national laws/regulations:

- **Civil Law** (Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607))

Real property rights and restrictions are defined under the relevant section of Civil Law and will be considered and met throughout the Project according to Turkish Civil Law.

- **Law on the Right to Information** (Law No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269)

The Right to Information Law ensures access to information based on the principles of equality, impartiality, and openness. Everyone has the right to information about public institutions and qualifying professional organizations.

- **Law on the Use of Right to Petition** (Law No.3071 (Issued on 10.11.1984, Official Gazette No. 18571)

Under Article 3 of the Law on the Use of Right to Petition, Turkish citizens and foreign residents have the right to submit written requests and complaints in Turkish to the Turkish Grand National Assembly and relevant authorities.

- **Expropriation Law** (Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215))

Another law related to the involvement of stakeholders in the Project is the Expropriation Law.

The Expropriation Law requires public disclosure and a meeting process. It starts with the approval of the relevant authority for the expropriation works in the public interest. This decision is made public for 15 days at the village or neighborhood mukhtars' office, after which it becomes the "cut-off date."

The administration action of the expropriation process is performed in line with the Expropriation Law according to its purpose, authorization, procedure, reason, and the subject of the action.

The responsible agency for Antalya-Alanya Motorway Project (the expropriation procedures will be carried out by KGM) establishes a Valuation Commission to determine the values of assets and resources. Subsequently, a negotiation commission is established to negotiate with property owners on the value. Each negotiation commission consists of at least three members. The Commission sends an official invitation letter to each property owner without disclosing the previously estimated value of the asset.

- **The Environmental Impact Assessment Regulation** (Official Gazette No: 31907, Article 9)

The EIA Regulation, originally from 1998, has had revisions and was most recently amended on July 29th, 2022. It is based on the EU EIA Directive but includes Turkish laws, making it distinct.

1. The meeting to inform the public about the investment and receive their opinions is held at a central place and time determined by the provincial directorate, with the participation of qualified institutions/organizations, the Ministry, and the project owner.
2. An announcement with the meeting details must be published in a newspaper at least 10 days before the meeting and in a local periodical specific to the region where the Project will be carried out.
3. A public meeting will be chaired by the provincial director or an appointed official to inform and consult with the public about a project. Attendees will be informed about the Project, and their opinions, suggestions, and objections will be recorded in meeting minutes. The minutes will be sent to the Ministry, with a copy kept by the provincial directorate.
4. Before finalizing the format, the Commission members should visit the planned project area and participate in the public information and consultation meeting on the specified date.
5. Stakeholder Engagement Plan (SEP) is prepared by authorized institutions to inform the public about the Project, receive their opinions and suggestions, and is presented in the EIA application file annex. Authorized institutions may request additional activities, such as distributing brochures, conducting surveys and seminars, or preparing a website. The plan may be updated if requested by the Ministry during the EIA process.

The lead government agency responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for the protection and conservation of the environment and sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project, are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,
  - Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
  - Defining and applying environmental quality standards,
  - Supervision of the network of environmental laboratories in Türkiye,
  - Pollution control and inspection activities,
  - Agroforestry support, soil management and erosion control, and
  - Protection of Türkiye's natural heritage, including national parks, areas of conservation interest, biodiversity, and wildlife.
- 
- **The Gender Based Violence (GBV) Regulation** The laws in force in Türkiye related to GBV issues are listed below with publication dates and numbers;
    - Labor Law (Law No. 4857, Issued on 10.06.2003)
    - Turkish Criminal Law (Law No. 5237, Issued on 12.10.2004)
    - Law of Protection of Family and Prevention of Violence Against Women (Law No. 6284, Issued on 20.03.2012)

The purpose of Labor Law (4857) is to govern the rights and responsibilities of workers employed under an employment contract and the working conditions provided by employers. This law applies to all workplaces, employers, employer representatives, and their employees, regardless of their field of activity. According to Articles 24 and 25, termination of the contract is permissible in the event of Sexual Harassment (SH) in the workplace, allowing the employee or employer to terminate the contract before the term's expiration or without waiting for the notification period.



Turkish Criminal Law aims to prevent crimes and safeguard the rights and freedoms of individuals, public order, security, public health, the environment, and community peace. Articles 102, 103, 104, and 105 in Section 6 detail GBV-related offenses and their penalties, including sexual assault, sexual abuse of children, sexual intercourse with a minor, and sexual harassment.

Law on Protection of Family and Prevention of Violence against Women (6284) is the cornerstone of Türkiye's response to violence against women. This law aims to regulate procedures and principles for the protection of women, children, all family members, and individuals subjected to persistent pursuit. It is rooted in the Turkish Constitution, international conventions to which Türkiye is a state party and relevant legal regulations.

Some key features of the Law No. 6284 include:

- Empowering local authorities to issue injunctions swiftly and efficiently in emergencies.
- Providing support services for survivors and perpetrators of violence, establishing Violence Prevention and Monitoring Centers and outlining the basics for temporary financial aid and medical expenses.
- Introducing preventive and protective measures for survivors, including forced imprisonment in case of a violation of preventive measures, and establishing a mechanism for monitoring the effective implementation of measures.
- Designating the Ministry as an active agent in the prevention of violence against women, granting it various responsibilities, including involvement in judicial cases.
- Basic principles to be observed in the implementation of this law include:
- Providing support and services to victims of violence through a fair, effective, and swift procedure based on basic human rights and equality between men and women.
- Fulfilling measures for victims and perpetrators of violence in a manner consistent with human dignity.
- Ensuring that special measures preventing gender-based violence against women and protecting women from such violence are not interpreted as discrimination under this law.

### 3.2 International Requirements and Best Practices

International financial institutions follow certain policies and procedures regarding assessment and management of environmental and social impacts of the projects to be financed. The relevant environmental and social requirements of these institutions are mainly based on World Bank Group (WBG) Safeguard Policies. For the private sector financing, WBG/International Finance Corporation's (IFC) Environmental Health and Safety Guidelines and Performance Standards on Environmental and Social Sustainability have become the one of the most important international requirements. These standards have also been adopted by the major international private banks through the so called Equator Principles (EPs). These principles aim to ensure that projects to be financed by these banks are developed in a socially and environmentally sound manner.

The Project is intended to meet applicable international standards and best practices of the International Finance Institutions (IFIs). IFIs consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits. In this context, SEP follows the requirements of EU directives, IFC PS1 and EPFI Principle 5 and EPFI Principle 6. The IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts covers public consultation and disclosure and in this respect, required consultation and disclosure activities have to be conducted taking the scale and nature of the Project into account covering the following:

- Identifying the range of stakeholders;
- Providing affected communities with access to relevant project information;
- Implementing and maintaining a grievance mechanism; and
- Engaging with and providing information to project-affected and other interested parties throughout the life-cycle of the Project.

### 3.2.1 Equator Principles IV

#### ***Principle 5: Stakeholder Engagement***

For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.

#### ***Principle 6: Grievance Mechanism***

For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user.

#### ***Principle 10: Reporting and Transparency***

In addition, regarding reporting and transparency, Principle 10 requires the client to make at a minimum, a summary of the ESIA that includes a summary of Human Rights and climate change risks and impacts when relevant accessible and available online for all Category A and, as appropriate, Category B Projects.

### 3.2.2 EBRD Performance Requirements

EBRD's performance requirements agree with the approach of the UNECE Aarhus Convention, which identifies the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

In addition, EBRD requires that the projects it supports conform to the purpose and goals of the Aarhus Convention. This Convention assures the rights of access to information, public participation in decision-making, and access to justice in environmental matters, therefore protecting human rights to a healthy environment.

Within this scope, the Project Company will conform to EBRD disclosure and stakeholder engagement requirements as outlined in EBRD's Performance Requirements (PRs) 1 and 10:

#### ***PR 1: Assessment and Management of Environmental and Social Impacts and Issues***

- Identify and engage with stakeholders in accordance with PR 10;
- Dynamic process of performance monitoring and evaluation, including the monitoring of stakeholder feedback, the local community or inspections by regulatory authorities; and
- Regular reporting to EBRD on stakeholder engagement during project implementation.

#### ***PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement***

- Identify people or communities that are affected or could be affected by the project, as well as other interested parties;

- Ensure that stakeholders are appropriately engaged on environmental and social issues that could potentially affect them; this is achieved through a process of information disclosure and meaningful consultation and
- Pay special attention to identifying vulnerable groups living in the project impact area to assess project activities' potential impact on their livelihood and well-being.

#### ***PR 10: Information Disclosure and Stakeholder Engagement***

- The Project Company will conduct stakeholder engagement based on providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.
- Stakeholder engagement will involve stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders.
- The nature and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment and the level of public interest. The requirements of national law for public information and consultation, including those laws implementing host country obligations under international law, will be met.
- The Project Company will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

Additionally, the key operational principles of effective engagement for EBRD projects are summarized as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s),
- Providing information in advance of consultation activities and decision-making,
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate,
- Respect for local traditions, languages, timeframes, and decision-making processes,
- Two-way dialogue that allows both sides to exchange views and information, to listen, and to have their issues heard and addressed,
- Inclusiveness in the representation of views, including ages, women and men, vulnerable and/or minority groups,
- Processes free of intimidation coercion ,or incentivization,
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

### **3.2.3 IFC's Standards and Guidelines**

IFC published its current Policy on Environmental and Social Sustainability in 2012. Within the framework of this Policy, it applies a comprehensive set of Performance Standards to manage social and environmental risks and impacts and to enhance development opportunities in its private sector financing in the member countries eligible for financing. The Performance Standards may also be applied by other financial institutions electing to apply them to projects in emerging markets.

The following eight Performance Standards establish the requirements that the client has to meet throughout the life of an investment supported by IFC or other relevant financial institution using these Standards:



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

PS 1 defines Stakeholder engagement as an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. According to IFC PS 1;

- Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialogue with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities the client will identify the Affected Communities and will meet the relevant requirements.
- The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- The client will provide Affected Communities with access to relevant information on (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- The client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures.
- The client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in the Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

IFC PS2 (Labor and Working Conditions) specifically relates to harassment, intimidation, and/or exploitation. According to IFC PS 2;

- The client will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women.

### **3.2.4 IFI Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation**

Recognizing the important role they play in both the example they set in their own institutional practices and in the high standards they adopt in their projects and operations, in April 2018, the IFIs reaffirmed their commitment to advance standards to prevent sexual harassment, abuse and exploitation through seven principles. According to IFIs reaffirm their commitment to (Principle 2) establish and maintain standards aimed at preventing sexual harassment, abuse, exploitation and other forms of misconduct. Implementation of this principle can be seen in the following:

- All IFIs maintain codes of ethics/conduct which embed high ethical standards and include provisions on harassment and misconduct including sexual misconduct which are applicable to staff behavior both within and outside the institution. Some IFIs have also adopted specific policies aimed at preventing and responding to sexual harassment, exploitation and abuse. These are applicable to all staff and are reviewed periodically and strengthened as needed.
- Some IFIs include behavioral clauses in contracts of appointment for non-staff members (including consultants, and contractors) to ensure that they too adhere to expected high standards of behavior. Breach of such provisions would provide an IFI with a right to terminate the underlying contract.

## 4 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In the scope of Antalya-Alanya Motorway Project, various studies were carried out with both internal and external stakeholders before the planned Public Consultation activities in the scope of this SEP. The Project Sponsor recognizes the importance of the stakeholder engagement activities and will carry out the activities planned under this SEP in order to make these activities more efficient, inclusive and continuous. Both internal and external previous stakeholder engagement activities are described in this section.

### 4.1 Public Consultation Meetings (PCMs) in the Scope of EIA Process

Within the scope of the EIA studies, one public consultation meetings were held alongside the route. The aim of the public participation meeting is to inform people who may be potentially affected about the Project and to understand their concerns, opinions and suggestions about the project. This process is the only formal requirement for stakeholder participation according to Turkish legislation.

The stakeholder engagement activities specific to the Project started at the time of the national EIA process. In this context, Antalya Provincial Directorate of Environment and Urbanization, relevant district Municipalities, District Governorships and Neighborhood/Village mukhtars were contacted in March 2016 to organize the stakeholder engagement activities. The formal stakeholder engagement meetings (public consultation meeting), a requirement of the Turkish EIA Regulation, were held on April 7<sup>th</sup>, 2016, at Ekşili Village Coffeehouse, Alanya Municipality Çıplaklı Wedding Hall, and Manavgat Chamber of Commerce and Industry Assembly Meeting Hall. Therefore, a total of three consultation meetings were held at three different districts of the Project route (based on EIA report, 2018): Döşemealtı, Alanya, and Manavgat districts of Antalya Province. Table 4.1 shows the meetings were announced in one local and one national newspaper as per the regulatory requirements. The meetings comprise the presentation of the Project details such as construction and operation activities, and noted the comments and suggestions by participants during the meetings.

**Table 4.1 Information of PCMs in EIA Process**

| PCMs | Districts  | Date       | Time  | Location  |
|------|------------|------------|-------|---|
| 1    | Döşemealtı | 07.04.2016 | 09:30 | Ekşili Village Coffeehouse                                      |
| 2    | Alanya     | 07.04.2016 | 11:00 | Alanya Municipality Çıplaklı Wedding Hall                       |
| 3    | Manavgat   | 07.04.2016 | 15:00 | Manavgat Chamber of Commerce and Industry Assembly Meeting Hall |

The EIA Review and Evaluation Commission set up by the MoEUCC; General Directorate of EIA, Permit and Inspection at the scoping stage of the national EIA processes included the governmental stakeholders listed in Table 4.2

**Table 4.2 Governmental Stakeholders Involved in the Scoping, Review and Evaluation of the National EIA Process**

| Organization                    | Directorate/ Administration   |
|---------------------------------|---|
| General Directorate of Highways | General Directorate of Highways 13th Regional Directorate   |
| Governorship of Antalya         | Investment Monitoring And Coordination Department<br>Antalya Governorship Repealed Provincial Directorate of Agriculture<br>Antalya Governorship Provincial Directorate of National Education |



|   |   |
|---|---|
| Antalya Metropolitan Municipality                           | Department of Housing and Urbanization<br>Department of Real Estate and Expropriation   |
| Ministry of Transport and Infrastructure                    | Antalya Airport Chief Directorate   |
| General Directorate of Mineral and Research and Exploration | General Directorate of Mining Affairs, Exploration Department   |
| Ministry Of Agriculture And Forestry                        | General Directorate of State Hydraulic Works<br>Department of Survey, Planning and Allocations<br>Directorate General of Agricultural Reform<br>General Directorate of Nature Conservation and National Parks<br>General Directorate of Forestry<br>Department of Permits and Easements |
| Ministry of Forestry And Water Affairs                      | Repealed Ministry of Forestry and Water Affairs 6th Regional Directorate<br>Antalya Branch Directorate  |
| Repealed Electricity Generation-Transmission Inc. (TEAŞ)    | General Directorate of Electricity Generation Corporation   |
| Ministry of Culture and Tourism                             | Directorate General of Investments and Enterprises<br>Regional Board of Protection of Cultural Heritage   |
| Ministry of Environment, Urbanization and Climate Change    | General Directorate of Conservation of Natural Assets<br>Provincial Directorate of Environment, Urbanization and Climate Change   |
| Ministry of Interior  | Provincial Directorate of Disaster and Emergency  |
| Ministry of National Defense                                | General Directorate of Machinery and Chemical Industry Corporation  |
| Ministry Of Industry And Technology                         | Directorate General for Industrial Zones  |

The EIA Application File was prepared on behalf of General Directorate of Highways and submitted to the Ministry of Environment and Urbanization by the e-EIA system on 04.03.2016, and the EIA process was initiated. During the preparation of the Project's EIA Report, the comments and opinions expressed by the local communities during the Public Participation Meeting, and the official views of the governmental stakeholders that formed the EIA Review and Evaluation Commission, were incorporated. Following the finalization of the report, the EIA was disclosed to the public via the MoEUCC and the Provincial Directorate of the Environment, Urbanization and Climate Change as per the requirements of the national EIA Regulation.

## 4.2 Stakeholder Engagement as part of the ESIA Process

The expert team in Encon held two separate field studies as part of the ESIA study, as summarized in Table 4.3. The first one was a reconnaissance study carried out on May 2-3, 2024 with the main objective of identifying the environmental and social features and sensitivities of the Project. This included planned art structures along the motorway route, campsites, quarries, and facilities such as the concrete plant, asphalt, and mechanical plan.

The second field study, conducted on 3-6 June 2024, focused on key informant, focus group, vulnerable groups, and other stakeholders (NGOs, Academicians, Communities, etc., in the region) interviews. During the social field study, key informative interviews were conducted with the mukhtars of four (4) settlements previously determined. Focus group interviews were held in eight (8) settlements, including mukhtars and households of 12 neighborhoods in the impact areas. Focus group interviews in Serik Merkez, Taşağıl, Kalemli, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara neighborhoods; and vulnerable group interviews were conducted in those areas. Additionally, other stakeholders such as academics, local officials, and local communities were interviewed to gather expert opinions on the socio-economic impacts of the Project.

**Table 4.3 Summary of the Social Field Studies Conducted as part of the ESIA**

| Tasks   | Date of the Field Study | Scope of the Field Study  |
|---|-------------------------|---|
| Site visit  | 2-3 May 2024            | <ul style="list-style-type: none"> <li>The reconnaissance study started at Km: 52+000, and ended at Km: 135+000</li> <li>Visiting the license area: planned tunnel, viaduct, quarry, facility area, and construction site and storage area.</li> </ul>  |
| Key Informant Interviews<br>Focus Group Interviews,<br>Other Stakeholder Meetings | 3-6 June 2024           | <ul style="list-style-type: none"> <li>Four (4) key informant interviews in Serik/Merkez, Manavgat/Ulukapı, Manavgat/Karakaya, and Alanya/Toslak neighborhoods</li> <li>Eight (8) Focus group interviews in Serik Merkez, Taşağıl, Kalemli, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara</li> <li>Interviews with Academics, local officials, and local communities</li> </ul> |
| Road Trip Study<br>Public Consultation Meetings (PCMs)                            | TBD                     | <ul style="list-style-type: none"> <li>-Four (4) PCMs are planning</li> </ul>   |

In parallel to the ESIA studies, the Company has started to establish close relationships. In this scope, Limak participate the reconnaissance study in the project area May, 2024.

A Stakeholder/Public Consultation Meeting (PCM) will be organized after the approval of the Draft ESIA and expropriation plan. During the meeting, details about the project, its potential environmental and social impacts/risks, mitigation measures to be taken, and implementation/monitoring/reporting responsibilities of different parties will be shared with the stakeholders; and then their opinions and suggestions will be received during the question-answer (Q&A) session.

#### 4.2.1 Road Trip

In December 2024, Public Consultation Meetings (PCMs) will be planned to be held in the four most affected locations related to the "Road Trip" study. However, due to delays in the completion of expropriation procedures, these meetings have been postponed and will be organized once sufficient progress has been made. These meetings aim to disclose Project impacts and planned mitigation measures, while creating a space for meaningful public feedback prior to the commencement of construction.

For the Project, four Public Consultation Meetings (PCMs) are to be held in selected locations: Merkez (Serik, Antalya), Ulukapı (Manavgat, Antalya), Karakaya (Manavgat, Antalya), and Konaklı (Alanya, Antalya). It is preferred that venues within local neighborhoods, which possess adequate capacity and appropriate physical conditions, are used for these meetings. This preference is based on the observation that participation levels are generally higher in such local venues, according to past experiences. Moreover, selecting the exact place/location will be considered to create a more inclusive environment that enables women and vulnerable groups to participate. Figure 4.1 and Figure 4.2 shows the locations of the planned PCMs. and those that social field study was conducted.

PCMs will take place along the entire Motorway route from the Serik district to the Alanya district of Antalya province. Table 4.5 displays details about the planning of PCMs, which will be finalized after determining a specific date and time. The meeting locations were selected based on findings from key informant and focus group interviews conducted in the region by a social expert employed in ENCON. The overall motorway route spans 117.8 km, including the main carriageway and the access roads. Since it would not be possible to organize a meeting in every settlement that is located within the study area, in the selection of the settlements at which the public consultation meetings are planned, it is aimed that a meeting location is determined every 25 (plus minus) km along the Motorway route to ensure to the extent possible that the meeting location is accessible for the local people from the surrounding settlements and in order to acquire a more inclusive Road Trip for all different stakeholders.

The meetings were held with the participation of representatives of Limak as Project Sponsors (senior officials and technical Project team members including design and expropriation), authorities from the 13th Regional Directorate of KGM, and the Environmental and Social Impact Assessment (ESIA) Consultant (ENCON Environmental Consultancy Co.).

The ESIA Consultant will moderate the meetings. The meetings will commence with an introduction and an explanation of the meeting's purpose and scope. This will be followed by a presentation from the ESIA consultant and a final discussion session to address any questions, concerns, and suggestions. The main topics to cover in the presentations are as follows:

- What is the Antalya-Alanya Motorway Project?
- Who are the project sponsor and ESIA Consultant?
- What are roles of the Project Sponsor and ESIA Consultant?
- What are the Anticipated Benefits of the Project?
- What is the Environmental and Social Impact Assessment Process?
- Stakeholder Engagement: How to Participate in the Process?
- Discussion (Questions and Answers) Session

Large-scale (in A0 format) maps showing the relevant part of the route in each meeting will be posted on the walls of the meeting venue. In addition, project information brochures will be shared with the participants. As a result of the information efforts, the attendance levels at meetings, particularly those that might be held in local neighborhood tea houses, will be adjusted to reach the expected number of participants. Different parties are expected to participate, including government officials or (significantly) from adjacent neighborhoods. Table 4.4 shows the expected local representatives of participant profile in planned PCMs. A list of participants will be maintained at the meeting.



Each meeting is scheduled to last around 1.5 hours. Due to the effects of the pandemic and possible hot weather conditions in the region, meetings held indoors are expected to last approximately 1 hour. However, it is possible that questions and suggestions from participants could extend the duration of meetings in some locations. Additionally, photographs taken during the meetings will be included in the report.

**Table 4.4 Summary of Participants Profiles**

| PCM No | Meeting Location | Adjacent Neighborhoods from which Representatives (Mukhtar or Local People) will Participated in the Meeting  | Other Parties Participated in the Meeting (Public Authorities, Media, etc.) |
|--------|------------------|---|---|
| 1      | Merkez           | Yukarıkocayatak, Aşağıkocayata, Kayaburnu, Dikmen, Çandır, Aşağıçatma, Burmahancı, Merkez, Cumalı, Üründü, Kökez, Deniztepesi Sarıbalı, Çakış, Sağırın, Taşağıl, Hocalar, Gündoğdu, and Yavrudoğan, neighborhoods                         | -   |
| 2      | Ulukapı          | Kalemler, Yeniköy, Şişeler, Evrenleryavşı, Dolbazlar, Yukarıışıklar, Sarılar, Hatipler, Gültepe, Ilıca, Side, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz,Aksaz, Hacıali, Cevizler, Sülek, and Hacısalı neighborhoods | -   |
| 3      | Karakaya         | Hacıobası, Karacalar, Kızılot, Uzunlar, Çavuşköy, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya, Alara, and Çakallar neighbourhoods,  | -   |
| 4      | Konaklı          | İncekum, Avsallar, Akdam, Türkler, Soğukpınar, Emişbeleni, Toslak, Konaklı, and Elikesik neighbourhoods   | -   |

**Table 4.5 Organizational Details of the Planning Public Consultation Meetings in Antalya**

| PCM No | Province | District | Neighborhood | Km Chain age | Population (Turkstat, 2024) | Date of the Meeting* | Time of the Meeting | Meeting Venue | Number of Participants |
|--------|----------|----------|--------------|--------------|-----------------------------|----------------------|---------------------|---------------|------------------------|
| 1      | Antalya  | Serik    | Merkez       | Km 25+000    | 17,969                      | TBD                  |                     |               |                        |
| 2      | Antalya  | Manavgat | Ulukapı      | Km 90+00     | 3,797                       | TBD                  |                     |               |                        |
| 3      | Antalya  | Manavgat | Karakaya     | Km 115+000   | 452                         | TBD                  |                     |               |                        |
| 4      | Antalya  | Serik    | Merkez       | Km 140+000   | 17,927                      | TBD                  |                     |               |                        |

\*Date of meeting will be set after expropriation done.





Figure 4.1 Locations of Conducted Social Field Study





Figure 4.2 Locations of Planned Public Consultation Meeting



## 4.2.2 Internal Stakeholder Engagement Activities

### 4.2.2.1 Employee Satisfaction Survey

The internal stakeholders of a project are crucial for its healthy progress. The largest group of internal stakeholders in terms of quantity is the employees. Employees of the project sponsor and subcontractors are involved in all stages of the Project's life cycle. Therefore, engaging with internal stakeholders through stakeholder engagement activities is an essential and crucial key performance indicator criterion. The project sponsor is expected to conduct various stakeholder engagement activities with internal stakeholders.

As part of internal stakeholder engagement activities, the Project Sponsor may conduct an employee survey to gather feedback on the overall operation of the Project. This survey aims to identify areas for improvement in management and the workplace and emphasize the importance of gender equality. By doing so, the Project aspires to promote inclusivity and create a better working environment for all employees, ensuring that everyone's views are valued and considered in the quest to enhance workplace dynamics and fairness.

The suggested employee questionnaire is prepared with at least a 5-point Likert scale. The survey study is set up to analyze the answers given by the employees to the given statements. The answers are categorized as strongly disagree (1), disagree (2), partially agree (3), agree (4), and strongly agree (5). The statements given to the employees to express their opinions within the scope of the survey are as follows:

1. I am satisfied with the cafeteria and the food served.
2. In the workplace, cleanliness, organization, and order are given importance.
3. The company attaches great importance to occupational health and safety issues.
4. The company provides the personal protective equipment required for the job.
5. I am satisfied with the working hours.
6. The behavior of the employees towards each other is good.
7. I have access to the things I need to do my job well.
8. My salary makes me satisfied.
9. In general, I am happy with my supervisor/top manager.
10. I am satisfied with the Company's Management.
11. Necessary security measures (other than occupational health and safety issues) are taken in our company.
12. I recommend this company to work with.
13. I am satisfied with the possibilities offered for the service.
14. Social areas within the construction site where we can spend time outside work are sufficient.
15. I am happy with the laundry and dormitory conditions.
16. The company promotes gender equality and ensures equal opportunities for all employees.

Conducting survey among workers only cannot fulfill the purpose of the survey; experts should also be consulted on the subject.

Provide SEAH and GBV training or develop a safety plan for women workers.

## 5 STAKEHOLDER IDENTIFICATION

In order to develop an effective SEP, it is necessary to determine who is likely to be affected (both directly and indirectly) by the Project ("affected parties"); who may have an interest in the Project ("interested parties"); and have the potential to influence project outcomes or operations.

An important stage of the stakeholder identification is the groups that are likely to be affected by the Project more or differently than other stakeholders, and whose influence on these possible impacts is expected to be relatively low. These groups are defined as "vulnerable groups" in the literature. One of the aims of the stakeholder engagement plan is to carry out an effective and sustainable communication, information and consultation process with these vulnerable groups. For this purpose, this SEP covers the following objectives related to vulnerable groups:

- Identifying vulnerable groups,
- The method and frequency of communication with vulnerable groups,
- Opportunities and priorities for vulnerable groups,
- Monitoring process,

The vulnerable groups identified in the project are as follows:

- Women head of household
- Elderly people / older adult who need care and social assistance
- Disabled (Physical / Mental)
- Unemployed people (even though they are looking for a job)
- Women who lost their spouses/divorced
- Those who are homebound due to chronic illness
- A child of school age who cannot go to school
- Illiterate adult
- Farmers who lost more than 70% of their land due to expropriation
- Seasonal agricultural workers
- Refugee and Immigrant
- People from different religions and sects
- Ethnic minority groups
- Yörüks

Gender inequality may be seen in stakeholder engagement process. Although it is not defined as a vulnerable group on its own, it is necessary to be sensitive to situations where women cannot take part in these stakeholder engagement activities. Project Sponsor should consider gender equality in the stakeholder engagement processes of the project and should approach with sensitivity to the problems that may arise in this regard. Project Company will take short and long-term steps towards resolving these problems. Arranging time and space so that women can participate in meetings and other events equally is one of the simplest and most effective steps that can be taken in this regard. In addition to the above-mentioned vulnerable groups, gender equality will be considered in the process of stakeholder identification, consultation with stakeholders and grievance management process.

Within the scope of the Project, it is important to identify stakeholders at the beginning of the process to inform key stakeholders (local people, relevant state institutions and NGOs) about the Project and provide effective participation of the stakeholders. To this end, the following individuals and groups should be considered specifically:

- People who are likely to be affected, directly or indirectly by the Project,
- People or institutions may have an interest in the Project,
- People or institutions that have the potential to influence
- Project outcomes or company operations.

Besides it is an important process to identify vulnerable or disadvantaged people or groups, who are likely to be affected by the Project in certain phases, accurately during the identification of stakeholders. Possible stakeholders who are likely to be affected by the Project or have an influence on the Project are listed below:

- Project employees, including Contractors. Project parties;
- National governmental and non-governmental organizations (NGOs);
- Local governmental organizations and NGOs;
- Local residents (potentially project affected persons including vulnerable groups); and
- Local businesses and universities

The stakeholders listed in Table 5.1 are the most prominent in the Project. Organizations or groups not listed can contact the Project Sponsor and provide their contact information to be informed about the Project. People living in residential areas near the Project will be considered as potential Project affected people/population (PAP) in this Stakeholder Engagement Plan (SEP). These settlements are also listed in Table 5.1. Therefore, one of the objectives of the SEP is to effectively consult and share information with these groups and address their concerns.

**Table 5.1 Project's Stakeholders List**

| Level    | Category                            | Organization / Entity  |
|----------|-------------------------------------|--|
| Internal | Appointed Company                   | LİMAK HOLDİNG  |
|          | Contractor's Personnel              | Information N/A  |
|          | Sub-contractors                     | Information N/A  |
| National | Ministries and Relevant Authorities | Ministry of Transportation and Infrastructure                        |
|          |                                     | General Directorate of Highways                                      |
|          |                                     | General Directorate of Infrastructure Investments                    |
|          |                                     | General Directorate of Motorways Arrangement                         |
|          |                                     | Ministry of Agriculture and Forestry                                 |
|          |                                     | General Directorate of State Hydraulic Works (DSİ)                   |
|          |                                     | General Directorate of Forestry                                      |
|          |                                     | General Directorate of Meteorology                                   |
|          |                                     | Ministry of Environment, Urbanization and Climate Change             |
|          |                                     | General Directorate of Spatial Planning                              |
|          |                                     | General Directorate of Environmental Management                      |
|          |                                     | General Directorate of Preservation of Natural Heritage              |
|          |                                     | General Directorate of Land Registry and Cadaster                    |
|          |                                     | Ministry of Culture and Tourism                                      |
|          |                                     | General Directorate of Cultural Heritage and Museums                 |
|          |                                     | Ministry of Energy and Natural Resources                             |
|          |                                     | General Directorate of Mineral Research and Exploration              |
|          |                                     | General Directorate of Electricity Generation Corporation (EUAS)     |
|          |                                     | General Directorate of Electricity Transmission Company (TEİAS)      |
|          |                                     | Ministry of Interior   |
|          |                                     | Gendarmerie General Command  |
|          |                                     | General Directorate of Security Affairs                              |
|          |                                     | Ministry of Labor and Social Security                                |
|          |                                     | General Directorate of Turkish Employment Agency (İSKUR)             |
|          |                                     | Ministry of Development  |
|          |                                     | Ministry of Defense  |
|          |                                     | Petroleum Pipeline Company (BOTAS)                                   |
|          |                                     | Prime Ministry's Disaster and Emergency Management Presidency (AFAD) |



| Level           | Category   | Organization / Entity  |
|-----------------|--|--|
|                 | <b>NGOs</b>  | The Union of Chambers and Commodity Exchanges of Turkey (TOBB)   |
|                 |  | World Wide Fund for Nature (WWF)   |
|                 |  | Foundation for the Protection and Promotion of the Environment and Cultural Heritage (CEKUL)             |
|                 |  | Environment Foundation of Turkey   |
|                 |  | Turkish Environmental and Woodlands Protection Society (TURCEK)  |
|                 |  | Union of Forestry Workers (ORMAN-IS)   |
|                 |  | Union of Turkish Roads, Buildings and Construction Workers (YOL-IS)                                      |
|                 |  | Confederation of Unions of Turkish Workers (TURK-IS)   |
|                 |  | Union of Construction Industry Employers (INTES)   |
|                 |  | The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA) |
|                 |  | Nature Association   |
| <b>Regional</b> | <b>Governmental Agencies and Authorities</b>         | Ministry of Agriculture and Forestry Regional Directorate  |
|                 |  | Ministry of Transportation and Infrastructure Regional Directorate of Highways                           |
|                 |  | Antalya Regional Directorate of Forestry   |
|                 |  | Antalya Water and Sewerage Administration  |
|                 |  | Antalya Provincial Directorate of Employment Agency  |
|                 |  | Antalya Regional Directorate of Cultural Heritage Preservation Board                                     |
|                 |  | General Directorate of Highways 13th Regional Directorate  |
|                 | <b>NGOs</b>  | Greenhouse Investors and Producers Association   |
|                 |  | Eastern Mediterranean Research Association   |
|                 |  | Mediterranean Protection Association   |
|                 |  | Turkish Foresters Association Western Mediterranean Branch   |
|                 |  | Mediterranean Association  |
|                 |  | Archaeologists Association Western Mediterranean Branch  |
|                 |  | Mediterranean Archaeology Association  |
|                 |  | Mediterranean Conservation Society   |
| <b>Local</b>    | <b>Governmental / Local Authorities and Agencies</b> | Antalya Governorate  |
|                 |  | Antalya Metropolitan Municipality  |
|                 |  | Serik District Governorate   |
|                 |  | Manavgat District Governorate  |
|                 |  | Alanya District Governorate  |
|                 |  | Serik District Municipality  |
|                 |  | Manavgat District Municipality   |
|                 |  | Alanya District Municipality   |
|                 |  | Antalya Provincial Police Department   |
|                 |  | Antalya Provincial Gendarmerie Command   |
|                 |  | Antalya Provincial Family and Social Policies Directorate  |
|                 |  | Antalya Provincial Culture and Tourism Directorate   |

| Level | Category  | Organization / Entity   |
|-------|---|---|
|       |   | Antalya Agriculture and Forestry Directorate  |
|       |   | Antalya Provincial Food, Agriculture and Livestock Directorate  |
|       |   | Antalya Forestry Regional Directorate   |
|       |   | Antalya Provincial Industry and Trade Directorate   |
|       |   | Antalya Environment, Urbanization and Climate Change Provincial Directorate   |
|       |   | Antalya Water and Sewerage Administration   |
|       |   | Antalya Highways 13th Regional Directorate  |
|       |   | Antalya Provincial Directorate of National Education  |
|       | NGO's   | Antalya Orchids and Biodiversity Protection Association (ANTOK, TÜRKİYE)  |
|       |   | Antalya Chamber of Commerce and Industry  |
|       |   | Turkish Agriculturalists Association Antalya Branch   |
|       |   | Turkish Nature Protection Association Antalya Branch  |
|       |   | Natural Resources and Biodiversity Protection Association   |
|       |   | Antalya Cultural Heritage Association   |
|       |   | Women's Social Life Research and Examination Association Antalya Branch   |
|       |   | Antalya Environment Platform  |
|       |   | Antalya Women's Cooperative   |
|       |   | Antalya Businesswomen's Association (ANTİKAD)   |
|       |   | Serik Chamber of Agriculture Presidency   |
|       |   | Serik Chamber of Tradesmen and Craftsmen Presidency   |
|       |   | S.S. Serik Boğazkent Women's Initiative Production and Business Cooperative   |
|       |   | Manavgat Women of Taurus Cooperative  |
|       |   | Turkish Agricultural Credit Cooperatives- Antalya   |
|       |   | TMMOB Chamber of City Planners Antalya Branch   |
|       |   | TMMOB Chamber of Agricultural Engineers Antalya Branch  |
|       |   | TMMOB Chamber of Forest Engineers Western Mediterranean Branch  |
|       |   | Alanya Sera-Bir Association   |
|       |   | Culture Routes Society  |
|       |   | Mediterranean Youth Association   |
|       |   | Antalya Industrialists and Business People Association  |
|       | Residential Areas/Local Communities/Potentially Project Affected People | <b>Antalya/Serik:</b> Yukarıkocayatak, Aşağıkocayatak, Kayaburnu, Dikmen, Çandır, Aşağıçatma, Burmahancı, Merkez, Cumalı, Üründü, Kökez, Deniztepesi, and Sarıbalı neighborhoods,   |
|       |   | <b>Antalya/Manavgat:</b> Çakış, Sağırın, Taşağıl, Hocalar, Gündoğdu, Yavrudoğan Kalemler, Yeniköy, Şişeler, Evrenleryavşı, Dolbazlar, Yukarıışıklar, Sarılar, Hatıpler, Gültepe, Ilıca, Side, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacısalı, Hacıobası, Karacalar, Kızılot, Uzunlar, Çavuşköy, Kadılar, Örenşehir, Yalçıdibi, Odaönü, and Karakaya neighborhoods |
|       |   | <b>Antalya/Alanya:</b> Alara, Çakallar, İncekum, Avsallar, Akdam, Türkler, Emışbeleni, Soğukpınar, Konaklı, Toslak, and Elikesik neighbourhoods,  |
|       |   | <b>Users</b> of the pasture located within the License Area of the Project*.  |
|       | Business Enterprises  | Business enterprises located along the route  |

| Level | Category            | Organization / Entity               |
|-------|---------------------|-------------------------------------|
|       | <b>Universities</b> | Akdeniz University                  |
|       |                     | Alanya Alaaddin Keykubat University |
|       |                     | Antalya Bilim University            |
|       |                     | Antalya Belek University            |
|       |                     | Alanya University                   |

## 6 STAKEHOLDER ENGAGEMENT PLAN

This part of the SEP introduces the stakeholder engagement plan for the Project Company and gives a detailed description of the disclosure process and timeline. It then presents AAMP's methods and frequencies for stakeholder engagement, along with the proposed stakeholder engagement plan for the construction and operation phases.

### 6.1 Methods and Tools for Information Dissemination and Stakeholder Engagement

LİMAK would use appropriate methods to disclose information about the planned Project, consult with stakeholders on potential benefits and risks of the planned project and potential adverse impact mitigation measures. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the proposed projects. Information will be disclosed using methods, which will be suitable for various groups of stakeholders at all project implementation stages. For all disclosure attempts IFC PS1 and EPFI Principle 5 will be followed and by doing so, the Project will be kept in international standards. The relevant means for consultations with stakeholders are provided in Table 6.1 and with possible timing in Table 6.2.

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- Formal/ informal face-to-face meetings,
- Focus group meetings,
- One-on-one interviews,
- Digital communication tools (including web pages, correspondence by phone/email, WhatsApp, short message service),
- Written materials,
- Grievance mechanism,
- Media promotions.

A range of tools will be utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. The project has and will continue to use the following methods for interacting with stakeholders:



**Table 6.1 Stakeholders / Purpose of Communication / Communication Methods**

| Stakeholders  | Purpose for Communication   | Type and Method of Communication  |
|---|---|---|
| <p>Local communities/settlements in the area (See Table 4.4.)<br/>Farmers and owners of the agricultural fields around the motorway route.<br/>Related local businesses near the motorway route.<br/>Local Universities<br/>Vulnerable groups specified under the stakeholder identification section of this document which include as follows:</p> <ul style="list-style-type: none"> <li>• Women head of household</li> <li>• Elderly people / older adult who need care and social assistance</li> <li>• Disabled (Physical / Mental)</li> <li>• Unemployed people (even though they are looking for a job)</li> <li>• Women who lost their spouses/divorced</li> <li>• Those who are homebound due to chronic illness</li> <li>• A child of school age who cannot go to school</li> <li>• Illiterate adult</li> <li>• Farmers who lost more than 70% of their land due to expropriation</li> <li>• Seasonal agricultural workers</li> <li>• Refugee and Immigrant</li> <li>• People from different religions and sects</li> <li>• Ethnic minority groups</li> <li>• Yörüks</li> </ul> | <p>Providing information on the nature of the proposed Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)<br/>Opportunities for the community to be actively involved in the project activities<br/>Mechanism / opportunities for suggestions and proposals<br/>Discussions on the potential adverse impacts</p>                                    | <p>Information through the media: newspapers, local TV, etc.<br/>Information about the prepared documents related to the project (ESIA report and SEP).<br/>Construction signs and warnings during the construction phase<br/>Group or individual meetings to identify impacts, agree and implement mitigation measures, project announcement (leaflets, etc.) as necessary</p> |
| Representatives of local communities (See Table 4.4)  | <p>Providing information on the nature of the Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)<br/>To generate opportunities for the community to be actively involved in the project activities<br/>To create mechanisms and/or opportunities for suggestions and proposals<br/>To give rise to discussions on the potential adverse impacts</p> | <p>Official correspondence and meetings to provide information on project progress and issues that concern local communities and providing direct information<br/>Information through the media: newspapers, media, face to face, etc.<br/>Information about the Project (ESIA, SEP, Management Plans)<br/>Formal/Informal Meetings with related parties</p>                    |
| Interested national and local NGOs<br>Other interested organizations will be added, as identified throughout the life of the Project  | <p>Providing information on the nature of the Project, duration of the Project, potential environmental, social and economic impacts (positive and negative)<br/>These organizations can potentially help to identify key issues pertaining to the local community (vulnerable groups) and the local environment</p>  | <p>Information through the media: newspapers, media, face to face, etc.<br/>Information about the Project (ESIA, SEP, Management Plans)<br/>Formal/Informal Meetings with related parties</p>   |
| AFAD Local emergency services, fire brigades, utility owners and operators, local police, coast guard, health services  | Inform relevant local authorities about Project and undertake official correspondence when needed   | Official correspondence and meetings to prepare for and coordinate activities during operation.   |
| Local and Central Governmental Institutions/Agencies  | Informing regarding Project progress and undertake official correspondence<br>Getting necessary approvals/opinions during project execution,  | Official correspondence and meetings, information disclosure and consultation reporting, monitoring, permit requests.   |

| Stakeholders                          | Purpose for Communication  | Type and Method of Communication  |
|---------------------------------------|--|---|
| General Directorate of Highways (KGM) | Providing information about the operation process of the Project, providing necessary information and reporting on relevant stakeholder engagement activities. | Official correspondence and regular meetings to provide information on project progress and address issues that concern local communities and stakeholders. Official correspondence and meetings, information disclosure and consultation reporting, monitoring, permit requests. |

Additional Suggestions: Special communication channels may need to be developed for some disadvantaged groups. Different disadvantaged groups can be targeted through home visits or phone calls for individuals who cannot leave their homes; visually oriented leaflets and phone calls for illiterate individuals; leaflets and posters in different languages.

## 6.2 Schedule and Timetable

The timing and form of activities for stakeholder engagement activities given in the previous section are detailed in Table 6.2 below.

**Table 6.2 Proposed Stakeholder Engagement Program during Project Implementation**

| Activity   | Method   | Timing*                  |
|--|--|--------------------------|
| Field Study  | Key informant interviews, focus group interviews, stakeholder meeting etc.                     | June 2024                |
| Road Trip  | Four Public Consultation Meetings alongside the motorway route, key informant interviews, etc. | TBD                      |
| Public Announcements                                       | Social Media announcements, Website of AAMP, Mass media arrangements etc.                      | Continuously as required |
| Disclosure of Environmental and Social Performance Reports | Website of AAMP  | Annually                 |
| Activities with related parties                            | Formal/Informal Meetings with representatives of related parties                               | Continuously as required |
| Reporting to KGM   | Official correspondences, meetings and reports   | Biannually               |

\* Timing of the activities may change due to changes that may occur during the implementation of the Project.

## 7 ROLES AND RESPONSIBILITIES

The anticipated activities in the SEP will be conducted and completed in operation phase by Project Company and KGM. In activities such as the grievance mechanism, LIMAK will be responsible for following requests, suggestions and complaints, and in the upcoming process, LIMAK will fulfil the requirements by being responsible for this mechanism in accordance with the IFC PS1, EPFI Principle 5 and Principle 6.

The implementation of this SEP will be conducted and monitored by Project Sponsor's Environmental and Social Interaction Manager who is responsible to appoint a Public Relations Specialist to be responsible for the stakeholder engagement for the Project, implementation of this SEP and grievance management. The Public Relations Specialist will perform the following functions:

- Information disclosure and obtaining feedback;
- Processing, managing and tracking grievances, including ensuring timely responses to and closure of grievances;
- Control over the implementation of the corrective actions to remedy grievances;

- Regular review and if necessary, update of the SEP and stakeholder engagement mechanism to ensure it is effective and reflects Project circumstances;
- Participation in discussion on responses and the resolution of disputes, and
- Assistance in the preparation of the Environmental and Social Performance Reports.

Depending on the complexity of issues, Project Sponsor's project management and experts of KGM may also be involved.

## 8 GRIEVANCE MECHANISM

### 8.1 Purpose of the Grievance Mechanism

The purpose of this mechanism is to establish a system for handling, evaluation and resolution of all kinds of internal and external grievances, concerns, queries and proposals of the affected communities and other stakeholders, such as construction workers, regarding the project activities.

Managing grievances, including avoiding and minimizing them as well as effective handling, is an integral part of a sound stakeholder engagement strategy. Experience shows that significant numbers of grievances arise from misunderstandings, and that such grievances can be avoided, or their numbers reduced, through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating into grievances.

In accordance with IFC PS 2 and EPFI Principle 6, a process is established by which people who deem that they have been adversely affected by the Project during planning, construction or operation can bring grievances to the Project for consideration and, if required, resolution. A specific Project grievance mechanism (GM) is beneficial in addressing community and individual concerns and complaints before they escalate beyond control.

### 8.2 Responsible Parties

LİMAK is responsible for implementing the grievance mechanism during the land preparation and construction and operation phases. LİMAK has to ensure that the grievance mechanism is implemented effectively.

LİMAK Public Relations Specialist (PR Specialist) is responsible to receive and manage the grievance process and actions to be taken to resolve incoming grievances, as well as reporting to the KGM. The relevant records would be kept and reported to KGM.

### 8.3 Grievance Mechanism

The main aim of the grievance mechanism is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project-affected stakeholders, and,
- Provide channels for the stakeholders to provide feedback and raise concerns.

#### 8.3.1 Grievance Mechanism at the National Level

##### *Presidency's Communication Centre:*

The Presidency's Communication Centre (CIMER) provides a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER only allow applications in Turkish. Contact details of CIMER are given in Table 8.1

Through CIMER, applicants can direct their requests directly to the relevant authorities. The requests submitted to CIMER are resolved within 30 days. If the applicants do not receive feedback within this period, they can re-submit their grievance to CIMER or elevate it to the Ombudsman Institution ([www.ombudsman.gov.tr](http://www.ombudsman.gov.tr)).



**Table 8.1 Contact Details of CIMER**

|                                  |  |
|----------------------------------|--|
| <b>Webpage:</b>                  | www.CIMER.gov.tr/ www.turkiye.gov.tr/  |
| <b>Call Centre (hotline):</b>    | 150  |
| <b>Phone number:</b>             | +90 312 590 20 00  |
| <b>Fax number:</b>               | +90 0312 473 64 94   |
| <b>Official Letter/Petition:</b> | Republic of Türkiye, Directorate of Communications T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe/ Ankara |
| <b>Individual Application:</b>   | Community relations desks at governorates, ministries and district governorates.                         |

CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

#### *Foreigners Communication Centre:*

The Foreigners Communication Centre (YIMER) provides a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. Contact details of YIMER are given in Table 8.2

**Table 8.2 Contact Details of YIMER**

|                                  |   |
|----------------------------------|---|
| <b>Webpage:</b>                  | www.YIMER.gov.tr  |
| <b>Email:</b>                    | YIMER@goc.gov.tr  |
| <b>Call Centre (hotline):</b>    | 157   |
| <b>Phone number:</b>             | +90 312 515 11 22   |
| <b>Fax number:</b>               | +90 312 920 06 09   |
| <b>Official Letter/Petition:</b> | Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ Ankara |
| <b>Individual Application:</b>   | Republic of Türkiye General Directorate of Migration Management   |

### **8.3.2 Grievance Mechanism at the Project Level**

External stakeholders can initiate the grievance/comment mechanism by using the following methods:

- Grievance/comment boxes and forms to be placed in public places including places commonly/ comfortably visited by women)
- Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. site chiefs/ managers, CLOs)
- Telephone (the contact numbers that can be used to submit grievances/comments) of the CLO will be shared with the local communities in due course)
- E-mail (the e-mail address for the submittal of grievances/comments will be shared with the local communities in due course)
- Website (the contact number of the CLO will be shared with the local communities in due course)

On the website of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. there is a Contact page which is available in Turkish and English (<https://www.antalyaalanyaotoyolu.com.tr/>). The grievances/requests related to Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş activities can be

communicated through this page and the resolution process is followed. The page includes information on email, phone number and mailing address of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. Name e-mail address, telephone number and explanation/message/grievance could be entered in the online platform. Notification that the application has been received is made via e-mail address. In addition, complaints/requests can also be submitted by contacting 0 312 446 88 00.

If the grievance/comment holder would like to fill out the form anonymously, the form (see Table 8.4 and Table 8.5) will allow the grievance/comment holder to file it without any personal contact information. For grievances/comments received verbally in person, the Project representatives will request the grievance/comment holder to fill in the form himself/herself by providing the 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 in 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. The Site CLO (construction)/ Operation Unit Manager (operation) will ensure that the grievance/comment forms are collected from the grievance/comment boxes weekly.

The procedural steps of the grievance mechanism are given in Table 8.3.

**Table 8.3 Procedural Steps of Grievance Mechanism**

| Step                                | Description of Process  | Time Frame                        | Responsibility   |
|-------------------------------------|---|-----------------------------------|--|
| GM implementation structure         | There exist two Grievance Mechanism at the National Level: <ul style="list-style-type: none"> <li>Presidency's Communication Centre and</li> <li>Foreigners Communication Centre</li> </ul>   | -                                 | Presidency's Communication Centre, and Foreigners Communication Centre and related authorities                           |
| Grievance uptake                    | Grievances can be submitted via the following channels: <ul style="list-style-type: none"> <li>Telephone</li> <li>Verbally</li> <li>E-mail</li> <li>Grievance/comment boxes</li> <li>Letter to Grievance focal points at local facilities</li> </ul> Complaint form to be logged via any of the above channels <ul style="list-style-type: none"> <li>Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box</li> </ul> Anonymous Grievances can be submitted via the following channels: <ul style="list-style-type: none"> <li>Telephone</li> <li>Letter to Grievance focal points at local facilities</li> <li>Suggestion box</li> </ul> | -                                 | Local grievance focal points   |
| Sorting, processing                 | Any complaint received is forwarded to PR Unit Manager and Project/Operation Manager, Logged in the Grievance Log, and categorized according to the complaint types <sup>1</sup> :<br><br>If the complaint is assessed to be out of the scope of the Grievance Mechanism, a grievant will be notified through the desired communication method and an alternative mode of solution will be suggested.   | Upon receipt of a complaint       | Local grievance focal points   |
| Acknowledgement and follow-up       | Receipt of the grievance is acknowledged to the complainant by CLO through a personal meeting, phone call or letter as appropriate, within a target of 2 working days after submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant.  | Within 3 working days of receipt  | Local grievance focal points   |
| Verification, investigation, action | Investigation of the complaint is led by Chief Sustainability Officer and Project/ Operation Manager. The Project Manager is notified of Level 1, 2 or 3 grievances<br><br>The Social Impact and Inclusion Manager, as appropriate, support the Project Manager in deciding who should deal with the grievance and determines whether additional support for the response is necessary.<br><br>A proposed resolution is formulated by Social Impact and Inclusion Manager, as appropriate, supports the Project Manager and is communicated to the  | Within 30 working days of receipt | The Complaint Committee is composed of Project Manager, Social Impact and Inclusion Manager, Community Liaison Officers, |

<sup>1</sup> Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc.).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

|                       |     |   |  |     |
|-----------------------|-----|---|--|-----|
|                       |     | complainant by CLO through the grievance/comment close-out form.  |  |     |
| Monitoring evaluation | and | Data on complaints are collected in a database and reported to Project Manager, Social Impact and Inclusion Manager and LİMAK HQ every three months   | Quarterly  | CLO |
| Provision feedback    | of  | Feedback from complainants regarding their satisfaction with complaint resolution is collected by CLO through phone calls or face-to-face interviews. | 15 working days after the implementation of the resolution | CLO |

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse including the right of petition, right to information and appeal to the ombudsperson (constitution, article 74) and right to constitutional complaint (constitution, article 148).

In addition to the project's GM for its internal and external stakeholders, EP 6: Grievance Mechanism requires the establishment of a Workers' Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. The Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees).

Any comments or concerns will be brought to the Company's attention verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the Company website, at the Project site, at the mukhtar's office, alongside a description of the grievance mechanism. All grievances will be:

Acknowledged within seven days after receipt;  
 Responded no later than within 30 working days after receipt, and  
 Specifically, nominated and trained members of staff will record grievance information in a grievance register. The information in the grievance register will include Stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

Individuals can request the right to have their names kept confidential, and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

- Step 1: Receipt of grievance and registering of grievance (3 working days),
- Step 2: Assessment,
- Step 3: Acknowledgement of grievance (acknowledged within 3 working days after receipt),
- Step 4: Investigation and resolution of grievance,
- Step 5: Closure; and (30 working days)
- Step 6: Outcome of the corrective action (1 working day after completion).

### Appeals Committee

In case the complainants are not satisfied with the decision of LİMAK and/or EPC on their complaints, they can refer to the Appeals Committee via LİMAK social impact team.

Appeals Committee consisting of LİMAK management teams is responsible for ensuring grievance mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

The mandate of the Appeals Committee covers considering complaints on the issues listed below (excluding those related with Labor Law and Expropriation Law):

- Unsolved grievance related to damage to environment,
- Unsolved grievance related to damage to public assets and infrastructure,
- Unsolved grievance related to damage to private assets (land, crops, houses etc.),
- Unsolved grievance related to impacts on livelihood,

The Appeals Committee carries out the following tasks:

- Meeting at least once a month or more often depending upon the existence of unresolved disputes,
- Reviewing the complaints by hearing both complainants and LİMAK and/or EPC
- Investigating the complaints in accordance with project requirements, LİMAK Policies, legal framework and referring to relevant expertise where required,
- Preparing an evaluation report based on the inquiries,
- Making a proposal on resolution of the disputes between parties.

The decision of the Appeals Committee is not binding and if parties do not agree on the Appeals Committee proposal, they still have the opportunity to either negotiate or litigate.

The Appeals Committee consists of the following members:

- Chief Sustainability Officer
- Chief Operation Officer
- Chief Legal and Compliance Officer
- Chief Business Development Officer
- Chief Finance Officer
- Social Impact and Inclusion Manager (secretary)
- Human Resources Manager (secretary)
- Subject Matter Expert, if required

The grievance mechanism will be widely announced to the public with stakeholder meetings held for project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism that also allows anonymous grievances. The grievances will be reviewed by the team according to the Project human rights and grievance mechanism.

#### 8.3.2.1 Grievances Related GBV/SH/SEA

To properly address SEA/SH risks, the GM will be in place prior to contractors mobilizing. For GBV—and particularly SEA/SH—complaints, there are risks of stigmatization, rejection and reprisals against complainant. This creates and reinforces a culture of silence so complainant may be reticent to approach the project directly. To enable women to safely access the GM, multiple channels through



which complaints will be registered in a safe and confidential manner will be enabled. The GM operators and CLO will to be trained on how to collect SEA/SH cases confidentially and empathetically (with no judgement).

Projects will have multiple complaint channels. No identifiable information on the survivor will be stored in the GM. The GM will not ask for, or record, information on more than the following related to the SEA/SH allegation:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
- If possible, the age and sex of the survivor; and
- If possible, information on whether the survivor was referred to services.

The information in the GM will be confidential—especially when related to the identity of the complainant.

Table 8.4 Sample External Grievance Register

| <div>ANTALYA ALANYA<br/>OTOYOLU</div> |  |                              | EXTERNAL GRIEVANCE/SUGGESTION REGISTER |                      |  |                                     |                                   |                                |               |                     |                 |                             |                               |                              |          |                                |                                       |
|---------------------------------------|--|------------------------------|--|----------------------|--|-------------------------------------|-----------------------------------|--------------------------------|---------------|---------------------|-----------------|-----------------------------|-------------------------------|------------------------------|----------|--------------------------------|---------------------------------------|
| Date of<br>Grievance/<br>Suggestion   | Grievance/<br>Suggestion<br>Submission<br>Method | Related<br>Facility<br>or KM | Complainant<br>Name                    | Complainant<br>Phone | Complainant<br>Address<br>Province/District/<br>Neighborhood | Grievance/<br>Suggestion<br>Channel | Grievance/<br>Suggestion<br>Topic | Grievance/Suggestion<br>Detail | Risk<br>Level | Emergence<br>Action | Related<br>Unit | Related<br>Officer'<br>Name | Related<br>Officer's<br>Phone | Mitigation<br>Measure/Action | Due Date | Grievance/Suggestion<br>Status | Grievance/Suggesti<br>on Closure Date |
|                                       |  |                              |  |                      |  |                                     |                                   |                                |               |                     |                 |                             |                               |                              |          |                                |                                       |
|                                       |  |                              |  |                      |  |                                     |                                   |                                |               |                     |                 |                             |                               |                              |          |                                |                                       |

Table 8.5 Sample Internal Grievance Register



|  ANTALYA ALANYA<br>OTOYOLU |  | INTERNAL GRIEVANCE/SUGGESTION REGISTER |                     |                      |                                   |                                |               |                     |                 |                              |                               |                              |             |                                |                                      |
|---|--|--|---------------------|----------------------|-----------------------------------|--------------------------------|---------------|---------------------|-----------------|------------------------------|-------------------------------|------------------------------|-------------|--------------------------------|--------------------------------------|
| Date of<br>Grievance/Suggestion   | Grievance/<br>Suggestion<br>Submission<br>Method | Related<br>Facility<br>or KM           | Complainant<br>Name | Complainant<br>Phone | Grievance/<br>Suggestion<br>Topic | Grievance/Suggestion<br>Detail | Risk<br>Level | Emergence<br>Action | Related<br>Unit | Related<br>Officer's<br>Name | Related<br>Officer's<br>Phone | Mitigation<br>Measure/Action | Due<br>Date | Grievance/Suggestion<br>Status | Grievance/Suggestion<br>Closure Date |
|   |  |  |                     |                      |                                   |                                |               |                     |                 |                              |                               |                              |             |                                |                                      |
|   |  |  |                     |                      |                                   |                                |               |                     |                 |                              |                               |                              |             |                                |                                      |

Table 8.6 Sample External Grievance Opening Form

|  |         |  |       |
|--|---------|--|-------|
|   |         | EXTERNAL GRIEVANCE/SUGGESTION OPENING FORM   |       |
| Complainant Information  |         | Submission Method  |       |
| Full Name  |         | <input type="checkbox"/> Phone Call<br><input type="checkbox"/> Petition ( <b>Attach 1 copy to this form</b> )<br><input type="checkbox"/> Face to Face public consultations<br><input type="checkbox"/> Village visit / meeting<br><input type="checkbox"/> e-mail<br><input type="checkbox"/> Other..... |       |
| Phone  |         |  |       |
| Address  |         |  |       |
| Related Location/Unit  | Project | <b>Anonymous Grievance/Suggestion</b><br><input type="checkbox"/>  |       |
| <b>Details about Grievance/Suggestion</b><br>Detailed description of the Grievance/Suggestion (direct statements of the Grievance/Suggestion Owner can also be added): |         |  |       |
| <b>Complainant's Suggestion for Solution</b>   |         |  |       |
| Complainant's Signature  |         | <b>Anonymous Grievance/ Suggestion</b><br><input type="checkbox"/>   | Date: |
| <b>THIS SECTION WILL BE FILLED BY STAFF</b>  |         | <b>Full Name and Signature:</b>  |       |

**CLARIFICATION TEXT FOR PERSONAL DATA**

This clarification text has been prepared by "LİMAK HOLDİNG" in accordance with Article 10 of the Law on the Protection of Personal Data No. 6698 and the Communiqué on the Procedures and Principles to be Complied with in Fulfilling the Obligation of Clarification.

**1. Purpose of Processing Personal Data**

As LİMAK HOLDİNG., within the scope of our public relations unit activities, your images, your name, surname, contact information, signature information included in these texts are processed as personal data, in case you send us your opinions, feedback, complaints and suggestions. Your personal data in question; It is processed for the purpose of receiving, evaluating and finalizing complaints and suggestions, management of complaints and suggestions, planning and execution of activities "in case data processing is mandatory for the establishment, exercise or protection of a right in accordance with Article 5/2/e of Law 6698".

**2. To Whom Personal Data Can Be Transferred And For What Purpose**

Your personal data can be shared with our LİMAK HOLDİNG companies and legally authorized public institutions, and to related institutions abroad in accordance with our reporting obligation, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law No. 6698, and can be processed at home or abroad in order to resolve your complaints and suggestions in line with the above-mentioned purposes.

**3. Method and Legal Reason for Personal Data Collection**

Personal data, name, surname, contact information, signature information in these texts are collected by taking photos at meetings and events, in order to convey your opinions, feedback, complaints and suggestions. Personal data collected for the above-mentioned legal reasons can be processed and transferred for the purposes specified in Articles 1 and 2 of this Clarification Text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law No. 6698, and may be processed at home or abroad.

**4. Rights of Data Owners and Use of These Rights**

In accordance with Article 11 of the Law, data owners have the following rights::

1. Learning whether their personal data is processed,
2. Requesting information about it, if personal data has been processed,
3. Learning the purpose of processing personal data whether they are used in accordance with its purpose,
4. Learning the third parties to whom personal data is transferred at home or abroad,
6. Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
7. Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws, and requesting that the transaction carried out within this scope be notified to the third parties to whom the personal data has been transferred,
8. Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,
9. In case of loss due to unlawful processing of personal data, the data owner has the right to demand the compensation of the damage.

*You can send your requests within the scope of Article 11 of the Law, which regulates the rights of the person concerned, to Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.'s website <https://www.antalyaalanyaotoyolu.com.tr/> in accordance with the "Policies in Corporate". Your request will be concluded free of charge within thirty days at the latest.*

**EXPRESS CONSENT STATEMENT ON THE PROCESSING OF INFORMATION AND PERSONAL DATA RECEIVED WITH THE GRIEVANCE/SUGGESTION FORM**

**I accept, declare and undertake.**  
**Name, Surname and Signature:**

**I do not accept, I do not have my express consent.**  
**Name, Surname and Signature:**





|   |  |  |  |
|---|--|--|--|
|    |  | <b>EXTERNAL GRIEVANCE/SUGGESTION CLOSEOUT FORM</b> |  |
| <b>Determined Corrective Action</b>   |  |  |  |
| <br><br><br><br><br><br><br><br><br><br>  |  |  |  |
| <b>Responsible Unit(s)</b>  |  |  |  |
| <br><br><br><br><br><br><br><br><br><br>  |  |  |  |
| <b>Closeout Date</b>  |  |  |  |
| <br><br><br><br><br><br><br><br><br><br>  |  |  |  |
| <b>B- Grievance/Suggestion Closeout</b>   |  |  |  |
| <p><i>This section will be filled and signed by the responsible when the file is closed. This section will include information on how the grievance was resolved or how the suggestion was managed; There will also be a statement and signature indicating that there is an agreement with the complainant.</i></p> <p><i>(Grievance received over the internet will be expected to respond by e-mail instead of signature).</i></p> |  |  |  |
| <b>Explanation:</b>   |  |  |  |
| <br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br><br>  |  |  |  |
| <b>Complainant's Name, Surname and Signature:</b>   |  |  |  |
| <b>THIS SECTION WILL BE FILLED BY STAFF</b>   |  | <b>Name, Surname and Signature</b>                 |  |
| <br><br><br><br><br><br><br><br><br><br>  |  | <br><br><br><br><br><br><br><br><br><br>           |  |

Table 8.8 Sample Internal Grievance Opening Form

|   |         |  |      |
|---|---------|--|------|
|    |         | INTERNAL GRIEVANCE/SUGGESTION OPENING FORM   |      |
| Complainant Information   |         | Submission Method  |      |
| Full Name   |         | <input type="checkbox"/> Petition ( <b>Attach 1 copy to this form</b> )<br><input type="checkbox"/> Face to face consultation<br><input type="checkbox"/> Meeting<br><input type="checkbox"/> e-mail<br><input type="checkbox"/> Other:..... |      |
| Phone   |         |  |      |
| Address   |         |  |      |
| Related Location/Unit   | Project | Anonymous Grievance/Suggestion<br><input type="checkbox"/>   |      |
| Details about Grievance/Suggestion  |         |  |      |
| Detailed description of the Grievance/Suggestion (direct statements of the Grievance/Suggestion Owner can also be added): |         |  |      |
| Complainant's Suggestion for Solution   |         |  |      |
| Complainant's Signature   |         | Anonymous Grievance/Suggestion<br><input type="checkbox"/>   | Date |
| THIS SECTION WILL BE FILLED BY STAFF  |         | Name, Surname and Signature  |      |

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### 6. To Whom Personal Data Can Be Transferred And For What Purpose

Your personal data can be shared with our LİMAK HOLDİNG group companies and legally authorized public institutions, and to related institutions abroad in accordance with our reporting obligation, within the framework of the personal data processing conditions and purposes specified in Articles 8 and 9 of the Law No. 6698, and can be processed at home or abroad in order to resolve your complaints and suggestions in line with the above-mentioned purposes.

### 7. Method and Legal Reason for Personal Data Collection

Personal data, name, surname, contact information, signature information in these texts are collected by taking photos at meetings and events, in order to convey your opinions, feedback, complaints and suggestions. Personal data collected for the above-mentioned legal reasons can be processed and transferred for the purposes specified in Articles 1 and 2 of this Clarification Text within the scope of the personal data processing conditions and purposes specified in Articles 5 and 6 of the Law No. 6698, and may be processed at home or abroad.

### 8. Rights of Data Owners and Use of These Rights

In accordance with Article 11 of the Law, data owners have the following rights;


1. Learning whether their personal data is processed,
2. Requesting information about it, if personal data has been processed,
3. Learning the purpose of processing personal data whether they are used in accordance with its purpose,
4. Learning the third parties to whom personal data is transferred at home or abroad,
6. Requesting correction of personal data in case of incomplete or incorrect processing and requesting notification of the transaction made within this scope to the third parties to whom the personal data has been transferred,
7. Requesting the deletion or destruction of personal data in the event that the reasons requiring its processing cease to exist despite the fact that it has been processed in accordance with the provisions of the law and other relevant laws, and requesting that the transaction carried out within this scope be notified to the third parties to whom the personal data has been transferred,
8. Objecting to the emergence of a result against the person himself by analyzing the processed data exclusively through automated systems,
9. In case of loss due to unlawful processing of personal data, the data owner has the right to demand the compensation of the damage.

*You can send your requests within the scope of Article 11 of the Law, which regulates the rights of the person concerned, to Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.'s website <https://www.antalyaalanyaotoyolu.com.tr/> in accordance with the "Policies in Corporate". Your request will be concluded free of charge within thirty days at the latest.*

## EXPRESS CONSENT STATEMENT ON THE PROCESSING OF INFORMATION AND PERSONAL DATA RECEIVED WITH THE GRIEVANCE/SUGGESTION FORM

**I accept, declare and undertake.**  
**Name, Surname and Signature:**

**I do not accept, I do not have my express consent.**  
**Name, Surname and Signature:**

|   |  |   |  |
|---|--|---|--|
|    |  | INTERNAL GRIEVANCE/SUGGESTION CLOSEOUT FORM |  |
| <b>Determined Corrective Action</b>   |  |   |  |
|   |  |   |  |
| <b>Responsible Unit(s)</b>  |  |   |  |
|   |  |   |  |
| <b>Closeout Date</b>  |  |   |  |
|   |  |   |  |
| <b>B- Grievance/Suggestion Closeout</b>   |  |   |  |
| <p><i>This section will be filled and signed by the responsible when the file is closed. This section will include information on how the grievance was resolved or how the suggestion was managed; There will also be a statement and signature indicating that there is an agreement with the complainant.<br/>(Grievance received over the internet will be expected to respond by e-mail instead of signature).</i></p> |  |   |  |
| <b>Explanation:</b>   |  |   |  |
|   |  |   |  |
| <b>Complainant's Name, Surname and Signature:</b>   |  |   |  |
| <b>THIS SECTION WILL BE FILLED BY STAFF</b>   |  | <b>Name, Surname and Signature</b>          |  |
|   |  |   |  |



## 9 MONITORING AND REPORTING

The SEP is a living document that will be updated periodically (at least once every six months) to document consultations conducted, issues raised, and actions taken. It will also include lessons learned, any modifications to the consultation process, and a schedule for ongoing future interaction.

### 9.1 Internal Monitoring

The Project Sponsor will monitor the participation of the stakeholders in the planned engagement activities. Through the evaluation of outcomes and the effect of engagement, LİMAK intends to obtain regular feedback from stakeholders and to learn if the planned outcomes are achieved or if there is a need to change the approach.

Throughout the Project, Project Sponsor will communicate with stakeholders and inform them about any significant issues, such as changes in the Project schedule.

Monthly summaries/reports of grievances, queries, and related incidents, together with the implementation status of corrective/preventive actions, will be prepared by the PR Specialist. The monthly summaries/reports will be a means to assess both the number and nature of complaints (if any), along with the Project Sponsor's ability to address complaints in a timely and effective manner.

During the operation phase, the PR Specialist will also prepare quarterly overall performance reports.

### 9.2 External Monitoring

In addition to internal monitoring, external monitoring activities will be carried out semi-annually in the construction phase and annually during the operation phase of the project by external/independent third-party experts (ESAP monitoring experts) to verify environmental and social monitoring information and perform monitoring services. As part of the external monitoring process, a final evaluation will be conducted to determine whether the implementation of the ESMS/ESMP complies with national environmental laws, international agreements, protocols, and environmental and social standards such as the Equator Principles and IFC Policy (2012) and related Performance Standards on Environmental and Social Sustainability applicable to the Antalya-Alanya Motorway Project.

Besides, local authorities and the Ministry of Environment, Urbanization and Climate Change (MoEU) have the authority to execute monitoring and inspection activities to follow up on the conformity of the Project activities with the environmental requirements as per the relevant legislation.