

TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP)

**2,892 MWp / 2,559 MWe Solar (Photovoltaic) Power
Plant Project
of Başakşehir Municipality**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

January 2026

Sub-Project Information	
Sub-Project	Details
Name	Türkiye Public and Municipal Renewable Energy Project (PUMREP) 2,892 MWp / 2,559 MWe Solar (Photovoltaic) Power Plant Project of Başakşehir Municipality Stakeholder Engagement Plan (SEP)
Project Owner/ Sub-borrower	Başakşehir Municipality
Financial Intermediary	İller Bankası A.Ş (İLBANK)
Prepared by	Ardea Energy Technologies Co.

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ABBREVIATIONS

AoI	Area of Influence
CIMER	Presidential Communication Center
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
EHS	Environment Health and Safety
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESMR	Environmental and Social Monitoring Report
ESS	Environmental and Social Standards
ETL	Energy Transmission Line
Firat EDAŞ	Firat Electricity Distribution Inc.
GBV	Gender Based Violence
GDNP	General Directorate of National Property
GM	Grievance Mechanism
HS	Health and Safety
IFC	International Finance Corporation
IFIs	International Financial Institutions
ILBANK	İller Bankası A.Ş.
LMP	Labor Management Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organizations
OIP	Other Interested People
PAP	Project Affected People
PIU	Project Implementation Unit
RE	Renewable Energy
Project	The Public and Municipal Renewable Energy Project (PUMREP)
PUMREP	Public and Municipal Renewable Energy Project
SEA/SH	Sexual exploitation and abuse/sexual harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
TEİAŞ	Turkish Electricity Transmission Corporation
WB	World Bank
WBG	World Bank Group
YIMER	Foreigners Communication Center

EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the “Project”) aims to support the Government of Türkiye to scale-up Renewable Energy (RE) use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country’s climate mitigation commitment and enhance energy security.

The PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities’ energy bills.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S policies and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and sub-projects financed through International Financial Institutions (IFIs).

The subproject to be financed under PUMREP includes the installation of a renewable energy facility with an installed capacity of is 2,892 MWp / 2,559 Mwe and expected to generate 4072 kWh of electricity annually by Başakşehir Municipality. During the construction phase, a total of 30 workers (including contractors and subcontractors) will work on site during the peak period, and no campsite will be set up on site for these workers. During the operation phase, 5 workers (5 out of 2 people are security guards) will work on site during the peak period and there will be no permanent accommodation for these workers; they will come from outside and work when necessary.

The subproject site is located in the district of Başakşehir and the Bahçeşehir 1st Stage (Tatarcık) Neighborhood, which is a part of İstanbul province. The subproject area is located on 3.92 hectares of land which is under the control of the Başakşehir Municipality. The solar panels used in the sub-project are of high quality and have a lifespan of 30 years.

This SEP has been formulated to ensure that sub-project affected interested parties and vulnerable groups that constitute the stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-project and its impacts.

SEP establishes a systematic approach to stakeholder engagement that will help Başakşehir Municipality to identify all stakeholders and how they will be affected by the Sub-project and ensure that the Sub-project is implemented in a participatory and community-friendly manner through building and maintaining a continuous constructive relationship with them, in particular with project-affected parties.

SEP also assesses the level of stakeholder interest and support for the Sub-project and guides the relations of the Başakşehir Municipality team with the stakeholders throughout the construction and operation process, enabling stakeholders' views to be taken into account in Sub-project design and environmental and social performance. In line with the World Bank's Environmental and Social Standard 10 (ESS10), this administrative arrangement and its implications for stakeholder engagement are explicitly considered. SEP is designed to ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.

Stakeholders for the sub-project were identified through desk-based review, field observations, and consultations with local authorities. The key sub-project-affected stakeholders include residents of the Bahçeşehir 1st Stage Neighborhood, neighborhood representative (Bahçeşehir 1st Stage Neighborhood' mukhtar), and workers involved in construction and operation activities. Other interested parties comprise relevant public institutions, contractors, and local media.

The sub-project Area of Influence is defined by the administrative boundaries of the Bahçeşehir 1st Stage Neighborhood due to its proximity to the sub-project site. However, as the sub-project area is located away from residential zones and does not overlap with active land use areas, potential social impacts on local communities are expected to be limited. Accordingly, stakeholder engagement activities under the SEP focus on information disclosure, consultation with local representatives, and the effective operation of the grievance mechanism in line with ESS10.

This SEP is a living document, which will be updated periodically to record consultations undertaken, issues raised, actions taken; to describe lessons learned and any changes to the

consultation process; and to outline the schedule for on-going and future interaction. Başakşehir Municipality will inform ILBANK on any changes made in SEP.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1.Objectives

PUMREP aims to support the Government of Türkiye to scale-up RE use in the public sector by focusing on central government buildings and municipalities. PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills. Başakşehir Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP.

The sub-project has been classified as having a moderate level of risk according to the E&S Risk Screening conducted by ILBANK in line with the ILBANK ESMS. One of the tasks under the scope of the Sub-project is the preparation of an Environmental and Social Management Plan (ESMP) Checklist and SEP in accordance with ILBANK's ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

Başakşehir Municipality is responsible for stakeholder engagement activities and implementation of grievance mechanism, ensuring that the sub-project is carried out in an inclusive and participatory manner.

This SEP of Başakşehir Municipality's Subproject is an action plan which was prepared for the 2,892 MWp / 2,559 MWe Solar (Photovoltaic) SPP sub-project and sets out methods for effective communication and interaction with stakeholders.

The ultimate purpose of this SEP is to establish and maintain constructive dialogue between Başakşehir Municipality and Project Affected People (PAP), Other Interested Parties (OIP) and vulnerable/disadvantaged individuals and/or groups that are essential for the successful management of the environmental and social impacts of the Sub-project. Başakşehir Municipality is fully committed to undertaking necessary engagement activities related to sub-projects in a manner that is consistent with good international practice as outlined in the next sections.

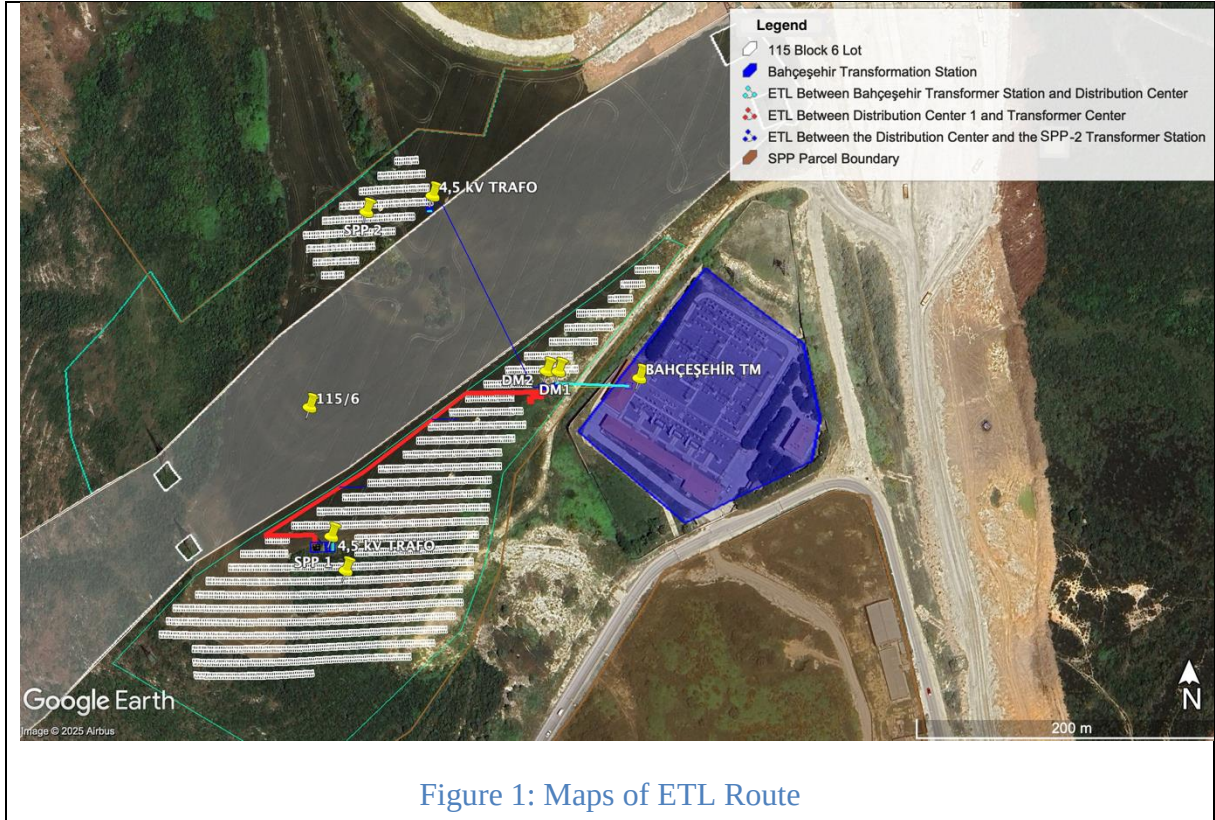
SEP provides a roadmap for the Başakşehir Municipality's engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to environmental and social assessments, by identifying the stakeholders' concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

1.2.Components

The subproject area is located within the boundaries of Bahçeşehir 1st Stage (Tatarcık) Neighborhood, Başakşehir District, Istanbul Province, and it consists of two separate solar power plants (SPP-1 and SPP-2) situated on the same parcel.

- Başakşehir Solar Power Plant–1 (SPP-1): to be installed on an area of 3.53 hectares (35,305.99 m²) with an installed capacity of 2.549 MWp / 2.3 MWe.
- Başakşehir Solar Power Plant–2 (SPP-2): to be installed on an area of 0.39 hectares (3,977.55 m²) with an installed capacity of 0.343 MWp / 0.259 MWe.

The total installed capacity of both facilities is 2.892 MWp / 2.559 MWe. The solar power plants will be connected to the **Bahçeşehir Transformer Center (34.5 kV)** through a **short underground medium-voltage Energy Transmission Line (ETL)**. The ETL will be installed entirely underground, has an approximate length of **200 meters**, and will not require the construction of transmission towers and land acquisition. The ETL route passes through **Parcel No. 115, Block 6**, which, is **under the ownership and administrative control of Başakşehir Municipality**. Therefore, no physical or economic displacement is expected in relation to the ETL component. Access to the subproject site will be provided through the **existing municipal road network** within Başakşehir District. The main access roads are asphalt-paved and in good condition. The final section of approximately **300 meters**, which is an existing unpaved service road leading directly to the SPP-1 and SPP-2 areas, will be used during construction and operation. Minor surface stabilization and maintenance works may be carried out to ensure safe and continuous access. No new road construction, road widening, or additional land acquisition is required.



1.3.Location

The solar power plant subproject is located in İstanbul Province, within the Başakşehir District, in the Bahçeşehir 1st Stage (Tatarcık) Neighborhood, on a 35,305.99 m² parcel identified as Block 115 / Park Lot. The area does not have a title deed or allocation certificate, as it is not a registered parcel in the land registry. However, Başakşehir Municipality has officially confirmed that the land is under its control and use in its official letter dated 14.08.2025. Also, there is no private ownership, legal or informal user. According to the valid zoning plan, the parcel area is currently designated as a “Park Area”, but the Başakşehir Municipality Plan and Project Directorate has initiated the zoning plan amendment process to change the land-use designation from “Park Area” to “Renewable Energy-Based Production Facility” (official letter dated 09.10.2025, No. E-24605144-622.99-269987) because according to Turkish legislation, energy facilities cannot be constructed in areas designated as parking areas in the zoning plan..

The sub-project site, therefore, remains public land under municipal administration, with no private ownership or allocation involved.

No agricultural activity or settlement exists within or near the subproject boundaries. The sub-project area is located on elevated and topographically rugged terrain, significantly higher than the surrounding settlements and physically detached from any residential or social facility areas. The sub-project area was selected based on its technical suitability for solar installation, proximity to existing TEİAŞ (Transmission Line) infrastructure, and absence of environmental or social constraints.

The main access to the Başakşehir SPP site is provided through the existing municipal road network within the Başakşehir District. The main access road consists predominantly of asphalt-paved municipal roads in good condition. The final section leading directly to the SPP-1 and SPP-2 areas (approximately 300 meters) is an existing unpaved service road that requires minor stabilization and surface improvement to ensure safe and continuous access during the construction phase. No road widening or additional land acquisition is required for this route. The access road is currently used by Başakşehir Municipality's service vehicles, and its maintenance and stabilization works will be carried out by the municipal technical teams prior to construction mobilization.

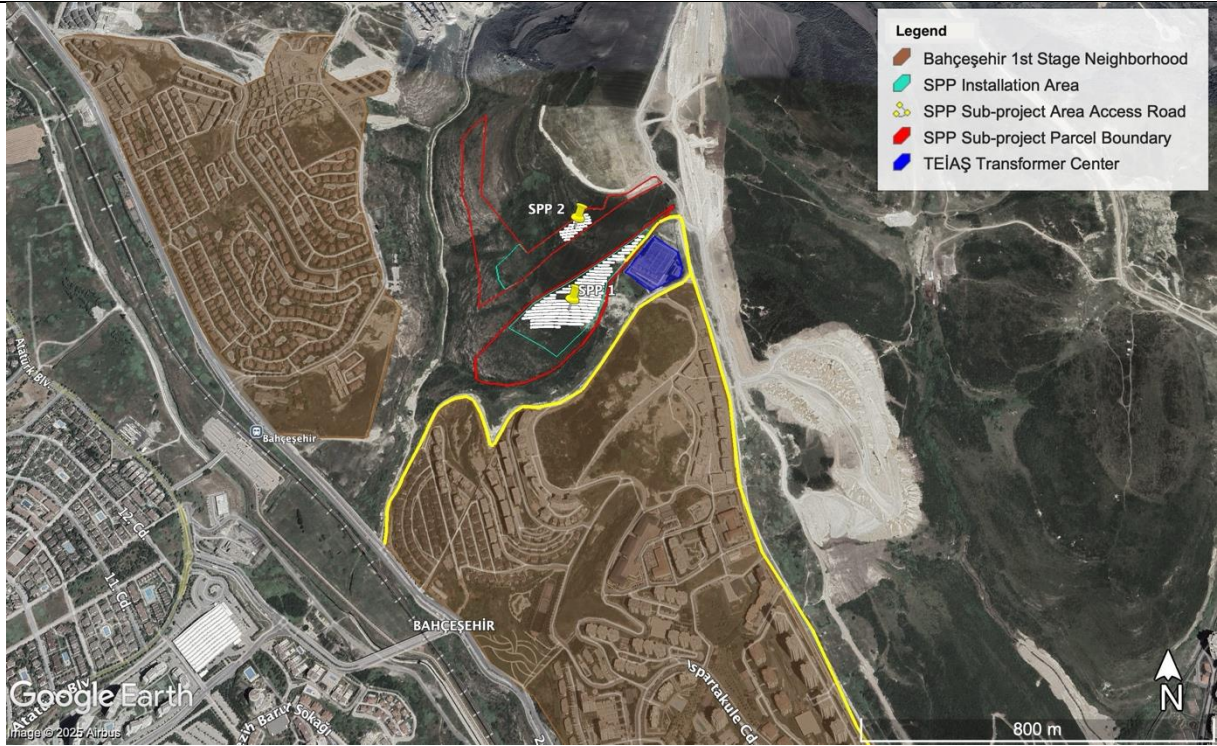


Figure 2: Map of Sub-project Location

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1.4.Sub-project Area of Influence

The Subproject Area of Influence (AoI) refers to the geographic region that may be affected by the direct, indirect, and cumulative environmental and social impacts of the subproject during its construction, operation, and decommissioning phases. This comprehensive definition covers not only the subproject footprint but also the surrounding environment, ecosystems, and settlements that may be affected by land use changes, natural resource utilization, emissions, noise, traffic, and socio-economic dynamics. In addition, areas that may be influenced by associated facilities and ancillary activities, as well as regions subject to cumulative impacts arising from interactions with other existing or planned projects, are also considered within this scope.

AoI for the Sub-project has been defined by considering both environmental and social components. This approach ensures that the impact area covers directly affected areas, indirectly affected areas, and the wider area potentially exposed to cumulative impacts.

- **Bahçeşehir 1st Stage Neighborhood:** The sub-project site is officially located within the administrative boundaries of Bahçeşehir 1st Stage (Tatarcık) Neighborhood in Başakşehir District. The center of the neighborhood is approximately 1.5–1.8 km northeast of the sub-project area, while the nearest residential clusters are located about 500 meters from the sub-project boundary. Although direct residential density around the immediate sub-project area is limited, Bahçeşehir 1st Stage Neighborhood is considered a core component of the impact area due to its administrative linkage, its proximity to the site, and potential indirect interactions such as local employment and accessibility. The southern edge of the neighborhood, where the residential clusters are commonly referred to as “Hoşdere” in the cadastral registry, lies approximately 300 meters south of the SPP-1 and SPP-2 areas, making it the closest settlement to the sub-project site. This neighborhood is included in the direct impact area, as temporary environmental and social impacts such as dust, noise, traffic, and visual effects may occur during the construction phase. The planned access road to the site passes along the edge of the 3rd Stage settlement area, potentially increasing short-term traffic-related disturbances during construction activities.

In conclusion, the impact area has been determined to include the broader vicinity of the Bahçeşehir 1st Stage (Tatarcık) Neighborhood, primarily for administrative and analytical purposes. On 12 November 2025, a consultation meeting was held at the Bahçeşehir 1st Stage Neighborhood Mukhtar’s Office with the Mukhtar’s deputy and a local resident. During the meeting, information was obtained regarding the general characteristics of the neighborhood, including its population, economic structure, and social and physical infrastructure. Information about the sub-project was provided, and details regarding the sub-project area were obtained from the Mukhtar’s deputy. It was stated that the neighborhood, which has a population of over 30,000, does not experience any problems related to infrastructure services. It was also noted that the sub-project area is located away from residential areas, is not currently subject to any active land use, and is not expected to create any adverse impacts or concerns for the local community. It was stated that there is no infrastructure, such as housing, schools, or septic tanks, that could potentially be damaged along the main road routes. The immediate surroundings of the site are characterized by steep slopes, undeveloped public land, and the presence of high-voltage transmission lines and the TEİAŞ Bahçeşehir Transformer Station, which further limit residential or recreational land use in the area.

Owing to these physical and spatial characteristics, the subproject's potential social and environmental impacts on nearby communities are expected to remain very limited. The elevation, distance from residential areas, and absence of sensitive receptors contribute to minimizing risks related to noise, dust, visual disturbance, and community health and safety. Therefore, while the Bahçeşehir 1st Stage Neighborhood remains the administratively recognized settlement within the general impact zone, the subproject area itself has minimal direct human or social interaction, and its environmental and social footprint is expected to be negligible under the defined mitigation and monitoring measures.

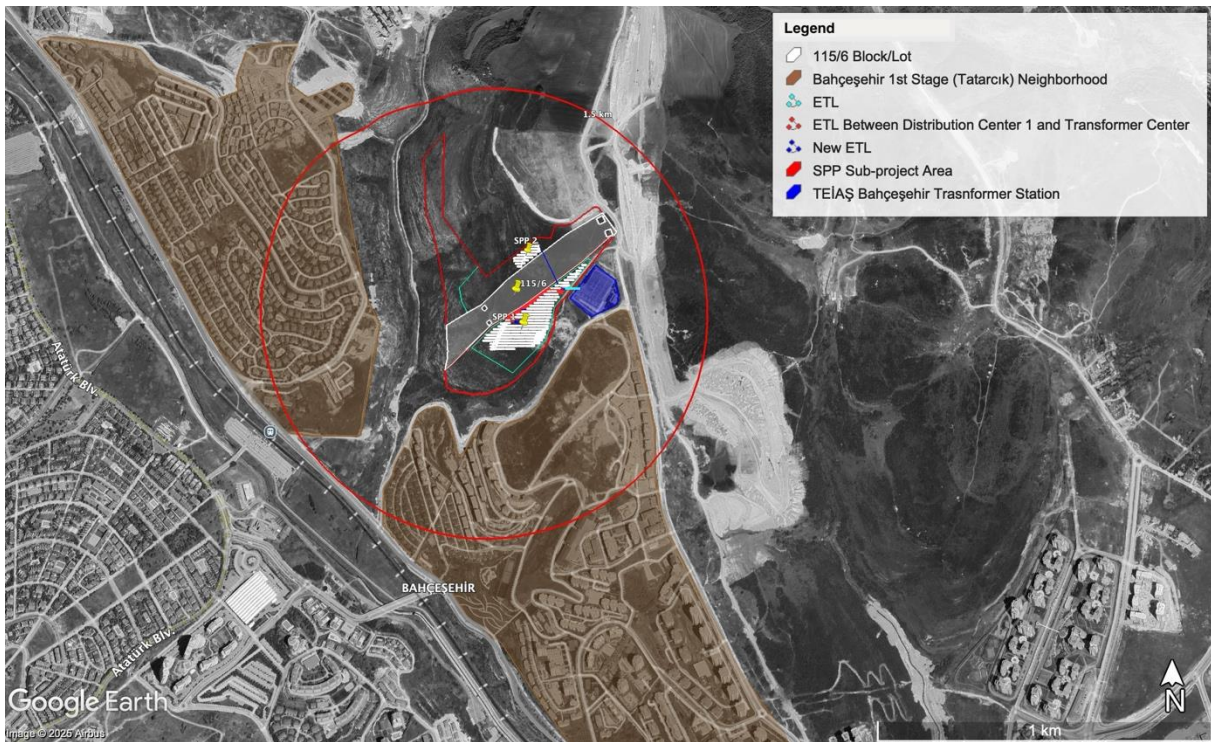


Figure 3: Sub-Project Area of Influence

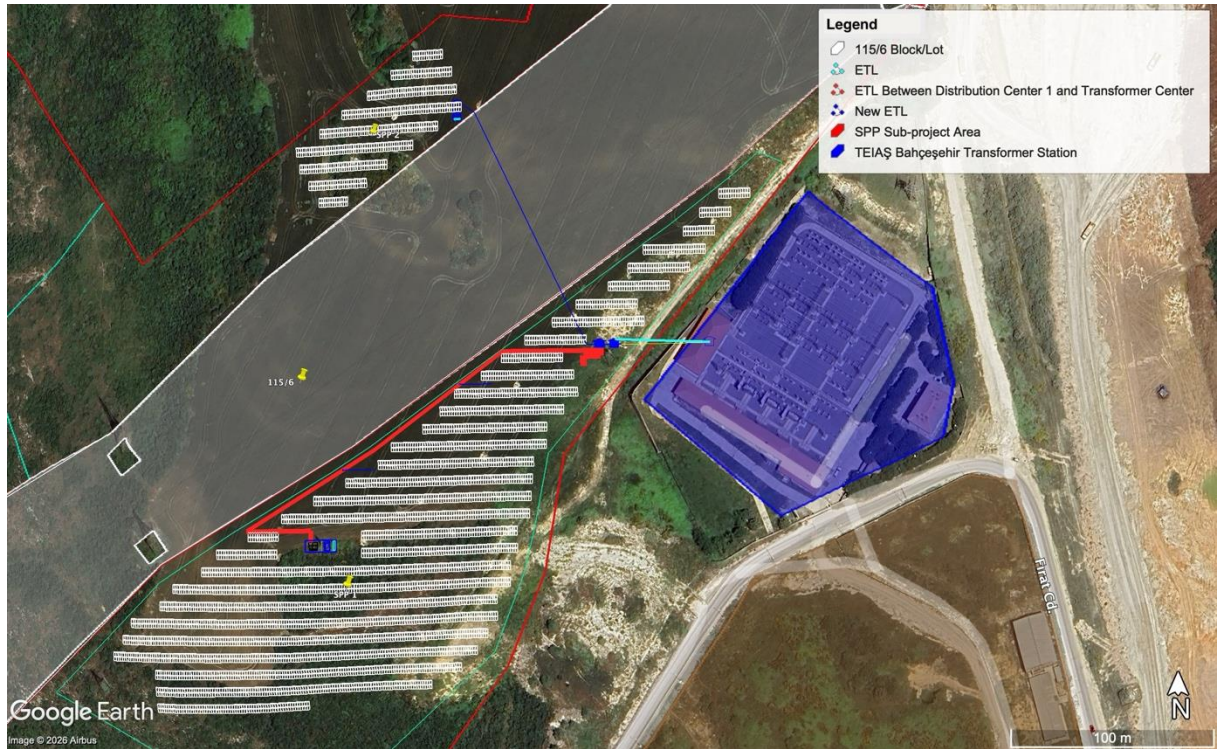


Figure 4: Close-View of SPP Sub-project Area

2. OBJECTIVE/ DESCRIPTION OF SEP

This Stakeholder Engagement Plan has been formulated to ensure that project-affected parties, other interested parties and vulnerable groups that constitute the “stakeholders” are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-Project and its impacts.

The objectives of the Stakeholder Engagement Plan of Başakşehir Municipality are as follows:

- To establish a systematic approach to stakeholder engagement that will help Başakşehir Municipality to identify all stakeholders and how they will be affected by the Sub-project and ensure that the Sub-project is implemented in a participatory and community-friendly manner through building and maintaining a continuous constructive relationship with them, in particular with all stakeholders.
- To assess the level of stakeholder interest and support for the Sub-project and to guide the relations of the Başakşehir Municipality team with the stakeholders throughout the installation and operation process, enabling stakeholders’ views to be taken into account in sub-project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with all stakeholders throughout the Sub-project life-cycle on issues that could potentially create an impact;
- To ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
- To provide all stakeholders with accessible and inclusive means to raise issues and grievances through multiple channels, including local complaint collection points in Bahçeşehir (e.g., neighborhood mukhtar offices, site office, grievance boxes, and a dedicated phone/WhatsApp line), and to ensure that these grievances are promptly transferred to and managed by Başakşehir Municipality. Grievance mechanism will clearly define local access points, procedures for transferring grievances to the municipality, and timelines for resolution, as explained in detail in the “Grievance Mechanism” section.

Stakeholder engagement plays a critical role for the successful completion of sub-projects, which has a wide stakeholder circle, from local people, vulnerable groups, public institutions

and non-governmental organizations. SEP provides the framework for stakeholder engagement and details the timing and methods of engagement with the different groups of stakeholders. SEP does not only identify the different stakeholder groups, but also identifies their needs and circumstances, and how they are being affected by the sub-project. SEP pays special attention to identified disadvantaged or vulnerable individuals or groups and determines how to ensure their inclusion in the stakeholder engagement activities. The SEP takes into account the main characteristics and interest of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders, while defining the interaction with all stakeholders, also explores the opportunities and risks brought by interaction with them.

SEP ensures a transparent, sensitive, and inclusive participation by defining the framework for Başakşehir Municipality's dialogues across the sub-project's stakeholder groups, in an inclusive, non-discriminatory manner. Implementation of the SEP will:

- Generate a good understanding of the Sub-Project among those that will be affected in particular ensuring that host communities in the potentially affected areas will have a full understanding that the sub-project is of benefit to everybody within the Sub-project area,
- Ensure early identification of issues that may pose risks to the Sub-Project or its stakeholders,
- Ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient), and
- Establish a system for long-term communication between the Sub-Project and communities that is of benefit to all parties. This requires that the engagement strategy for the Sub-project ensure outreach to all stakeholder groups (e.g. host community), clearly informing them of the benefits from the Sub-project, and thereby reducing any social risk that misconceptions about the outreach of the Sub-project may cause.

SEP communication strategy vis-à-vis stakeholders also defines the mechanisms through which the stakeholders can express their concerns and transmit their grievances, and how such concerns and grievances will be responded to and resolved in a timely and adequate manner.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

During the mapping process of the stakeholders, the nature of the Sub-project's impacts is identified, and the methods and frequencies of the relations to be built with stakeholders are formulated.

It is critical that particular efforts are given to identify disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the sub-project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an ongoing process and will need to be regularly reviewed and updated.

3.1. Methodology

Stakeholder identification for the sub-project has been carried out through a structured and stepwise methodology in line with the ESS10 and good international practice. The methodology is designed to ensure that all individuals, groups, and institutions that may be affected by or have an interest in the sub-project are systematically identified and appropriately engaged. The stakeholder identification and analysis process consisted of the following steps:

(i) Review of Sub-Project Characteristics and Impact Area

As a first step, the physical, environmental, and social characteristics of the sub-project were reviewed, including its location, scale, construction and operation activities, land ownership status, access routes, and energy transmission components. Based on this review, the geographic area of influence of the sub-project was defined, focusing on areas potentially affected during construction and operation phases.

(ii) Identification of Potentially Affected and Interested Parties

Stakeholders were identified through a desk-based review of available subproject documentation (including zoning plans, land ownership records, technical layouts, and environmental and social assessment documents), as well as consultations with relevant municipal departments and local representatives (e.g. neighborhood mukhtars).

Stakeholders were identified based on their:

- Proximity to the sub-project area and access routes,
- Administrative or institutional responsibility related to the Sub-project,
- Potential exposure to environmental or social impacts,
- Interest in or influence over the sub-project.

(iii) Categorization of Stakeholders

In accordance with ESS10, identified stakeholders were categorized into the following groups:

- **Project-Affected Parties:** individuals, groups, or entities directly or indirectly affected by the Sub-project and its activities;
- **Other Interested Parties:** institutions, organizations, or individuals that are not directly affected but have an interest in the Sub-project, such as public authorities, service providers, and relevant civil society organizations.

(iv) Identification of Vulnerable and Disadvantaged Groups

Special consideration was given to identifying vulnerable or disadvantaged groups who may face barriers to participation or may be disproportionately affected by subproject activities. This assessment was based on the local socio-economic context, land use characteristics, and consultation inputs. Where relevant, tailored engagement approaches will be applied to ensure inclusive and meaningful participation.

(v) Determination of Engagement Methods and Frequency

Based on the stakeholder categories and their relationship to the sub-project, appropriate engagement methods, communication tools, and consultation frequencies were defined. These methods are proportionate to the level of impact and stakeholder interest and are designed to be accessible, transparent, and culturally appropriate.

Prior to defining the stakeholder engagement principles, stakeholders were identified through a structured methodology based on clearly defined criteria, sequential steps, and multiple data sources. The identification process relied on a review of sub-project documentation (including zoning plans, land ownership records, technical layouts, and environmental and social assessment documents), desk-based analysis, field observations, and consultations with relevant municipal units and local representative (e.g. neighborhood mukhtar). Stakeholders were determined based on their proximity to the sub-project area and access routes, administrative or institutional responsibility, potential exposure to environmental and social impacts, and their level of interest in or influence over the sub-project.

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

- **Openness and life-cycle approach:** Public consultations for the subproject will be arranged during the subProject cycle, carried out openly, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be widely provided to all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the sub-project cycle. The participation process for the sub-projects will be inclusive. All stakeholders at all

times will be encouraged to be involved in the consultation and sub-project implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of subproject benefits and the cultural sensitivities of diverse ethnic groups.

- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Subproject's stakeholder communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.
- In accordance with ESS 10, the Sub-Project has identified stakeholders, taking into account both project-affected parties and other interested parties, such as individuals or groups affected or likely to be affected by the subproject. Therefore, stakeholders have been identified and categorized as "project-affected parties" and "interested parties" (other individuals or groups that may have an interest in the subproject).

3.2. Project Affected Parties

The term "project-affected parties" refers to individuals or groups likely to be impacted by the sub-project due to actual effects or potential risks to their physical environment, health, safety, cultural practices, well-being, or livelihoods. These stakeholders may include individuals and groups, particularly local communities.

For the Başakşehir SPP sub-project, the primary project-affected parties have been identified as the residents of Bahçeşehir 1st Stage Neighborhood, due to the neighborhood's proximity to the sub-project area and its administrative relevance within the sub-project's area of influence.

In addition, workers employed during the construction and operation phases, including contractors and subcontractors, are considered project-affected parties due to their direct exposure to occupational health and safety risks associated with sub-project activities.

The project affected parties, including individuals, groups, and communities, who will cooperate and consult on and during the sub-project, are as follows:

- Bahçeşehir Neighborhood . The total population of the neighborhood is 37,332, with 19,462 women and 17,870 men. The total population aged 0-19 is 11,817 ¹.
- Subproject Workers

3.3. Disadvantaged/ vulnerable individuals or groups

Disadvantaged/Vulnerable individuals or groups are people who may be disproportionately impacted or further disadvantaged by the sub-project(s) compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the subproject.

The identification of vulnerable groups for the sub-project was carried out through field visits, consultations with the Deputy Mukhtar of Bahçeşehir 1st Stage Neighborhood, and a review of neighborhood-level demographic data. The assessment was conducted at the neighborhood scale, as the sub-project site is located away from residential areas and does not interact directly with daily livelihoods or community infrastructure.

The SPP site is situated outside residential zones and does not overlap with housing areas, agricultural land, grazing areas, or public service facilities. As confirmed during the consultation held on 12 November 2025, the subproject area is currently unused and does not create direct social or economic impacts on local residents... Therefore, while no subproject-induced, location-specific adverse social or economic impacts on vulnerable individuals are expected, it is recognized that some vulnerable groups may experience challenges related to access to information and effective communication regarding the sub-project. In line with ESS10, targeted information disclosure and tailored engagement measures will be implemented to ensure that vulnerable individuals are adequately informed and able to participate meaningfully in the stakeholder engagement process.

Nevertheless, in line with the precautionary approach under ESS10, the following groups residing within the administrative boundaries of Bahçeşehir 1st Stage Neighborhood were identified as potentially vulnerable at the community level:

:

¹ <https://www.endeksa.com/tr/analiz/turkiye/istanbul/basaksehir/bahcesehir-1-kisim/demografi>

1. **Disabled individuals:** Construction activities can disrupt accessibility routes and restrict mobility. They may have special needs for access to participation activities while exact numbers are not available at neighborhood level.
2. **People over 65 years of age Living Alone and need special Care:** Construction activities can disrupt the daily routines and access to basic services of elderly individuals over 65 who live alone and require special care, potentially causing discomfort or stress. They may have specific needs for access to participation activities. According to demography of the neighborhood, the total population of the people over 65 years is 2568.
3. **People with chronic illnesses or in need of special care:** Construction-related activities (traffic, damage to infrastructure, etc.) can affect access to basic services and routines, exacerbate health problems or cause discomfort. Based on consultations with neighborhood representatives and municipal social service units, individuals with chronic illnesses or in need of special care are present within the administrative boundaries of the neighborhood. However, no disaggregated or publicly available data exists at neighborhood level.
4. **Female head of households:** While exact numbers are not available at neighborhood level, female-headed households may face barriers to participation due to caregiving responsibilities and limited access to information.

The SPP sub-project area is located far away from the residential area. Also, the Bahçeşehir Neighborhood has more than 30000 people, and during the interview with a Mukhtar's deputy on 12 November 2025, and interview with the Mukhtar on 26 January 2026 there was no certain data about these groups. Due to the location of the subproject area, these impacts will be low.

3.4. Other Interested Parties

Other interested parties include institutions and organizations that are not directly affected by the sub-project but may have an interest due to their administrative roles, oversight responsibilities, or involvement in information dissemination. These parties include the District Governorate of Başakşehir, Bahçeşehir 1st Stage Neighborhood Mukhtar's Office, relevant provincial-level environmental and energy-related NGOs, (e.g. TEMA Foundation, WWF-Türkiye, Chambers of Engineers and Architects of Turkey (TMMOB) affiliated chambers in Istanbul) and local and regional media organizations operating in Istanbul and Başakşehir. Engagement with these stakeholders is primarily intended to ensure coordination, transparency,

and public information sharing. Given that the sub-project is located away from residential areas and is not expected to result in significant environmental or social impacts, engagement with other interested parties will mainly be conducted through information disclosure and communication activities, and further engagement will be undertaken if subproject-related concerns arise during implementation.

Stakeholder groups within the scope of the sub-project are as follows in Table 1.

Table 1. Stakeholder Groups

Stakeholder Group		Cause of Impact/Risk	Level of Interest	Level of Influence
Project Affected Parties	Local communities (Bahçeşehir 1st Stage Neighborhood)	Settlements that have the potential to be directly adversely affected by sub-project activities due to their proximity to the sub-project site in terms of dust, noise, traffic, etc.	Medium	High
	Workers (including supply chain) to be employed for the sub-project activities	Potential risks related to labor and working conditions, etc.	High	High
Vulnerable individuals or groups	- Disabled individuals; - People over 65 years of age; - People with chronic illnesses or in need of special care; - Female head of households.	Vulnerable and disadvantaged individuals and/or groups might be disproportionately affected by adverse sub-project impacts	Low	High
Other Interested Parties	NGOs (e.g. TEMA Foundation, WWF-Türkiye, Chambers of Engineers and Architects of Turkey (TMMOB) affiliated chambers in Istanbul)	Environmental and social impacts of the sub-project (depending on NGO's field).	Medium	Low
	- Governmental Bodies - Ministry of Industry and Technology, - Ministry of Energy and Natural Resources, - Governorship of İstanbul, - İstanbul Provincial Directorate of Environment,	A positive impact is expected with the energy generated from the subproject. Government agencies may be involved in the permitting process, land acquisition process or in organizing consultations with communities.	High	Medium

	Urbanization and Climate Change ○ Başakşehir Municipality • District Governorate of Başakşehir • Bahçeşehir 1st Stage Neighborhood Mukhtar's Office • Press Agencies (BaşakHaber) • Local Newspapers(Bahçeşehir Newspaper, Vitrin Newspaper)			
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4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of stakeholder engagement done during project preparation

As part of the stakeholder engagement activities carried out during the preparation of the SEP, consultations and field studies were conducted to verify the existing land use, social conditions, and potential stakeholder concerns in and around the Başakşehir SPP sub-project area.

Within this scope, a site visit and stakeholder consultations were conducted on 12 November 2025. The engagement activities included:

- One meeting in the Bahçeşehir 1st Stage Neighborhood Office, with the mukhtar's deputy, and

One meeting with a local resident living in the Bahçeşehir 1st Stage (Tatarcık) Neighborhood. During the site visit, the subproject area and its immediate surroundings were examined on-site. The stakeholders also stated that, due to the subproject area's distance from residential areas and its physical characteristics, they do not expect any significant adverse environmental or social impacts during either the construction or operation phases of the sub-project.

All stakeholder consultations conducted during the subproject preparation phase were documented. Information regarding the sub-project scope, location, and potential impacts was shared with the consulted stakeholders to support transparency and local awareness during the SEP preparation process.

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

Stakeholder engagement for the sub-project has been designed based on an assessment of stakeholder characteristics, information needs, and potential levels of interest and influence. Different engagement methods and tools will be applied depending on the stakeholder group and the subproject phase, in line with ESS10 requirements.

Stakeholder Consultation Meetings (SCMs) will be organized for project-affected and interested parties, particularly residents of the Bahçeşehir 1st Stage (Tatarcık) Neighborhood. These meetings will provide information on the sub-project and allow stakeholders to express their views, questions, and concerns.

Information will be widely shared through various media channels, as local media usage is prevalent among individuals of different ages and backgrounds in the communities impacted

by the sub-project. These channels will include local radio and TV stations, newspapers, social media, community websites and forums, SMS and mobile notifications, public notice boards, as well as community meetings or public announcements. The Başakşehir Municipality's communication platforms and channels will also be utilized to ensure broad dissemination of information.

Beyond the municipality's official communication channels, locally accessible tools will be used in Başakşehir, including information boards at mukhtar offices, local radio, and distribution of brochures in neighborhoods. Flyers and posters will be placed in Bahçeşehir to ensure easy access to information by residents.

Written information will be made available to the public through various communication tools and materials such as brochures, flyers, posters, etc. Başakşehir Municipality will also regularly update its websites with sub-project key updates and reports on the environmental and social performance of the Sub-project. The websites will also provide information on the grievance mechanism for the Sub-project (see section **Error! Reference source not found.** below). All stakeholder engagement processes will be recorded, monitored, evaluated and reported with consultation and backup documents such as participant lists, photographs, records, etc.

If needed, site visits or demonstration tours will be organized for selected stakeholders from media organizations or local government during all phases including construction, operation and decommissioning of the sub-project.

The Information Desk at the Başakşehir Municipality building will provide information to local residents on stakeholder engagement activities, construction updates, contact information for complaint methods, etc. Brochures and flyers on social and environmental issues related to the various sub-projects will be available at these information desks.

The sub-project will implement specific measures to ensure that disadvantaged and vulnerable groups (such as women, the elderly, disabled individuals, and refugees) have equal access to information, opportunities to provide feedback, or submit grievances.

The identification of vulnerable stakeholders will be an ongoing process, requiring regular review and updates. Engagement methods will be tailored to appropriately inform women, the elderly, disabled individuals, and refugees, while also understanding their views and concerns. Focus group meetings, women's meetings, and the provision of translators for refugees dedicated specifically to vulnerable groups may be considered as necessary.

In Başakşehir, the Provincial Immigration Administration will facilitate communication and engagement with the refugee population. Additionally, the District Social Assistance and Solidarity Foundation will be the point of contact for refugees seeking assistance. Başakşehir Municipality will collaborate with these governmental bodies during the engagement process if required.

From the early stages of the sub-project lifecycle, information about the sub-project and the grievance mechanism will continue to be disclosed to the public through individual or group meetings, printed materials, and notice boards, as well as SMS. The current Başakşehir Municipality website² will be used to disclose sub-project documents.

The sub-project documents, including the ESMP Checklist and SEP, will be available at the Başakşehir Municipality office. Sub-project posters, brochures, and information related to the grievance mechanism and the sub-project will be provided in local areas such as the Bahçeşehir 1st Stage mukhtar's offices, coffee houses, or mosques. Sub-project updates (including news on construction activities and basic environmental and social data) will also be posted on the homepage of Başakşehir Municipality's website. Additionally, details about the sub-project Grievance Mechanism will be posted on the website. To enable stakeholders to submit their complaints, an electronic grievance notification system will be established via email (belediye@basaksehir.bel.tr) and a communication hotline accessible at 444 0 669. Başakşehir Municipality will regularly update and maintain its website.

Sub project-related documents (ESMP-Checklist, SEP, brochures) will be available in Istanbul Başakşehir, particularly at the mukhtar offices of Bahçeşehir 1st Stage. Furthermore, complaint boxes and notice boards will be installed in these neighborhoods to ensure accessibility of the grievance mechanism.

4.3. Stakeholder Engagement Plan

The main goals of the stakeholder engagement program and the planned schedule for the various stakeholder engagement activities are to describe at what stages throughout the Sub-project's life these activities will take place, and with what periodicity. Where decisions on public meetings, locations, and timing of meetings have not yet been made, information is provided on how people will be made aware of forthcoming opportunities to review information and provide their views.

² <https://www.basaksehir.bel.tr/>

SEP ensures the preparation of an open profile of the stakeholders and clear sight of the relationships between the sub-project and stakeholders. Meeting with all of the stakeholders listed in the matrixes on the underlined subject matters at the pre-determined timeline is crucially important. The frequency of the meetings can be increased when needed.

SEP in

Table 2 presents the nature and level of stakeholders' interest in the sub-project and the ways the engagement will be conducted, the engagement frequency and the PIU of Başakşehir Municipality, and the following matrix is the tabulated version of this program.

The parts analyzed by the matrix are as follows in

Table 2. Subject of Meeting/Interview identifies the subject matters that need to be discussed with the stakeholder at the predetermined frequency.

- Method of Information specifies the communication tools and ways that may be used for engagement, such as face-to-face meetings, website announcements, SMSs, and brochures, etc.
- Frequency establishes a calendar for engagement.

The responsible party/person is required to be determined by the Başakşehir Municipality representatives. The Başakşehir Municipality will be responsible for implementing the stakeholder engagement process, even in case that actual stakeholder engagement works may be contracted to a third party.

The following stakeholder engagement program represents key characteristics, preferred notification means, and specific needs for stakeholder groups.

Table 2. Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Before the construction phase starts	Informing affected communities about the subproject, potential impacts, and grievance mechanism	• Web site • Flyers, posters • Info desk at Başakşehir Municipality • by mukhtar • Press release • Social media • Face-to-face information meetings • Brochures	• PAPs • OIPs • Vulnerable/disadvantaged individuals/groups	Başakşehir Municipality
	Before the construction phase starts	Ensuring the participation of vulnerable/disadvantaged groups in consultation activities and addressing their concerns	Disabled Individuals • Municipality info desk for in-person inquiries • Sign language support at face-to-face meetings • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. • Announcements won't be made through mukhtars, as this method may not reach	Vulnerable/disadvantaged individuals/groups in Başakşehir Neighborhood -Disabled Individuals -People over 65 years of age -Immigrants and refugees -People with chronic illnesses or in need of special care -Female head of households	Başakşehir Municipality

			people with disabilities effectively. Instead, more direct and accessible ways like SMS, call centers, or home visits will be used. People Over 65 Years of Age • Announcements by the mukhtars of AoI • Printed brochures with larger fonts • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. Immigrants and Refugees • Interpreter support at face-to-face meetings • Social media announcements for easy access • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. People with Chronic Illnesses or in Need of Special Care • Website updates for remote access		
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			- Flyers and posters at key locations - Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. Female Heads of Households - Announcements via social media - Flyers and posters in community centers - Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed.		
Construction	Monthly	Updates on construction activities, potential disruptions, and grievance mechanism	Website, social media, announcements, meetings	PAPs OIPs	Başakşehir Municipality Supervision Consultant Contractor
	Monthly after construction begins	Monitoring and addressing specific needs of vulnerable groups	- Grievance Mechanism (complaint/feedback system) - Face-to-face consultations if needed - Telephone support for accessibility (including sign language support if required)	Vulnerable/disadvantaged groups	Başakşehir Municipality Supervision Consultant Contractor

			Website updates for relevant information		
	Monthly	Occupational health and safety training and updates on working conditions	Information brochures, grievance mechanism, toolbox trainings	Sub-project workers	Başakşehir Municipality Supervision Consultant Contractor
	Monthly	Updates on subproject progress and compliance with regulations	Face-to-face meetings, correspondence	National and provincial public institutions	Başakşehir Municipality Supervision Consultant Contractor
Operation	Yearly	General subproject updates and long-term monitoring	Website, social media, flyers, posters	All residents in Başakşehir	Başakşehir Municipality
	Yearly	Ensuring continued accessibility and inclusion of vulnerable groups	Website, social media, flyers, posters	Vulnerable groups in Başakşehir	Başakşehir Municipality
	Yearly	Compliance updates and coordination	Correspondence	National, provincial, and district-level public institutions, district municipalities, mukhtars of indirectly affected neighborhoods	Başakşehir Municipality
	Yearly	Media engagement and public communication	Face-to-face meetings, telephone, press releases, interviews	Press agencies, local newspapers	Başakşehir Municipality

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

The Project Implementation Unit (PIU) of Başakşehir Municipality will be the main responsible body for the implementation of the SEP and the Grievance Mechanism (GM) throughout the sub-project lifecycle.

The PIU will consist of designated municipal staff with defined roles and responsibilities related to environmental and social management, stakeholder engagement, and grievance handling. The PIU will ensure coordination between Contractors, Supervision Consultants and ILBANK.

Key responsibilities of the PIU regarding stakeholder engagement include:

- Overall coordination and supervision of SEP implementation;
- Ensuring that stakeholder engagement activities are carried out in accordance with ESS10 and the SEP;
- Allocation of sufficient human and financial resources for SEP activities;
- Ensuring timely disclosure of subproject-related information;
- Oversight of the Grievance Mechanism and monitoring grievance resolution.

For any questions, comments, or concerns related to the sub-project or the stakeholder engagement process, stakeholders may contact the responsible PIU representatives through the official communication channels of Başakşehir Municipality. The organization structure of the PIU to be established by the Sub-borrower is presented in Figure 4.

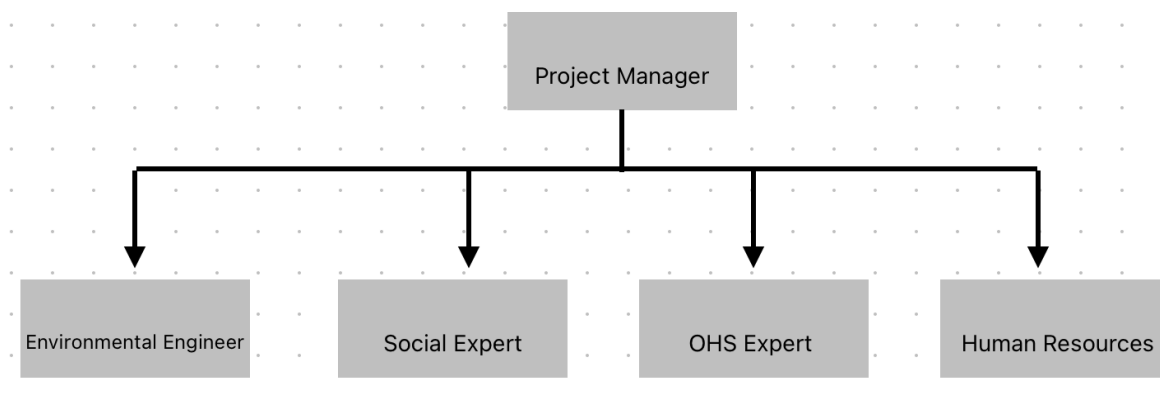


Figure 5: Organization structure-PIU

The Sub-borrower will maintain the PIU by ensuring that there is qualified staff assigned and serving on the duty throughout the sub-financing agreement life cycle. If the necessary staff is not available within its own organizational structure, the Sub-borrower shall receive support/ consultancy services from outside.

5.2.Resources

Başakşehir Municipality will mobilize human and material resources to implement the SEP and manage the Grievance Mechanism (GM). Başakşehir Municipality will be primarily responsible for coordinating stakeholder engagement activities as outlined in this SEP. The collection of grievances, questions and feedback will be the direct responsibility of the Social Affairs Manager of the Başakşehir Municipality.

The material resources that Başakşehir Municipality will mobilize are:

- Sub-Project specific page on Başakşehir Municipality's website;
- Electronic grievance database;
- Stakeholder engagement register;
- Printed documents (manuals, brochures, posters, etc.) to be used in accordance with SEP requirements.

5.3. Management and Functions and Responsibilities

Başakşehir Municipality PIU is the main responsible party for the implementation of the SEP. PIU will have designated staff responsible for SEP and GM.

The roles and responsibilities of these stakeholders are summarized in below Table 3.

Table 3.Roles and Responsibilities of Key Actors/Stakeholders in SEP Implementation

Institution	Roles and Responsibilities
PIU (Başakşehir Municipality)	• Implementation of the SEP. • Planning and implementation of SEP activities in close collaboration with ILBANK PMU. • Informing Başakşehir Municipality's SEP related activities to management board of the ILBANK, • Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status. • Announcing key construction activities (road closures, service interruptions), Consulting on specific SEP activities, • Organizing stakeholder engagement meetings, • Outreach to PAPs/stakeholders for site specific subproject issues, • Reporting on SEP activities to ILBANK PMU
Başakşehir Municipality Grievance Mechanism Contact Person	• Planning and implementation of the SEP implementation at the municipal level, in close collaboration with ILBANK PMU. • Consultation on specific SEP activities; • Announcing the important construction activities (such as road closures and service interruptions); • Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status. • Acting as the focal point for the GM in the PIU, • - Coordinating and monitoring GM contacts at the contractor level, • - Collecting subproject-related grievances from all different GM levels, • Informing the PIU and management about the solution process,

Institution	Roles and Responsibilities
	• - Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PIU in monthly progress reports, • - Maintaining contact with the PIU in order to respond to grievances/find solutions • Keeping records and following up on grievances related to the subproject, • - Managing and coordinating the solution process of subproject-related grievances, • -Inspecting grievance records for relevant non-compliance issues or recurring issues with stakeholder engagement and other subproject activities, • -Preparing compiled GM reports related to the subproject
Supervision Consultant	• Review the SEP document to redefine the stakeholders in the subproject and to follow up the implementation of the methods, instruments, timing and participation levels identified in the SEP, • Interview Başakşehir Municipality PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, • Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the subproject, • Interacts with various stakeholders to get their views on SEP implementation, • Controls whether the necessary trainings are given to the personnel who will work during the construction phase, • Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other subproject activities and to reveal actions, • Meets with WB safeguard policies and audit teams and responds to queries as necessary, • Monitors and reports on progress made in relation to the commitments defined in SEP.
Contractors/sub-contractors	• Inform Başakşehir Municipality on any issues related to engagement with stakeholders; • Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by Başakşehir Municipality • Inform ILBANK PMU and Başakşehir on important construction activities (such as road closures and service interruptions) and of any issues related to their engagement with stakeholders; • Maintaining contact with the Başakşehir Municipality GM Focal Point for the follow up of the grievances, • Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing, • Informing local communities of any environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.), • Developing and implementing a grievance mechanism both for the E&S performance of the sub-project and for their workforce including sub-contractors, prior to the start of works in compliance with Başakşehir Municipality's GM requirements.

6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of grievance mechanism is to provide access to a grievance resolution procedure for Subproject stakeholders. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Subproject worker's, local communities, and other stakeholders.

In the Sub-Project Level Grievance Mechanism, Public Grievance Mechanism and Worker Grievance Mechanism, grievances will be submitted in Turkish through Turkish forms. In addition, if a stakeholder who does not speak Turkish but has grievances about the environmental and social performance of the subproject or, necessary language support will be immediately provided by Başakşehir Municipality.

The structured GM will ensure that grievances associated with the Sub-Project are addressed through a transparent and impartial process. The public will be informed about the GM through the disclosure and consultation of the SEP and through the stakeholder engagement activities to be conducted throughout the life of the subproject.

6.1. Grievance Mechanism at National Level

The intake channels for the existing national-level GMs are provided below:

Presidency's Communication Centre (CIMER): The Presidency's Communication Centre (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **CIMER Website:** www.cimer.gov.tr
- **CIMER Call Centre:** 150
- **CIMER Phone number:** +90 312 525 55 55
- **CIMER Fax number:** +90 0312 473 64 94
- **Address for Official Letter:** Republic of Türkiye, Directorate of Communications Kızıllırmak Mah. Mevlana Bulvarı No:144 Çankaya/Ankara

- **Mail addressed to Republic of Türkiye**, Directorate of Communications
- **Individual applications at the community relations desks** at governorates, ministries and district governorates

The Foreigners Communication Centre (YIMER): The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **YIMER Website:** www.yimer.gov.tr
- **YIMER Call Centre:** 157
- **YIMER Phone number:** +90 312 5157 11 22
- **YIMER Fax number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No:4 Yenimahalle/Ankara
- **Mail addressed to Republic of Türkiye**, Directorate of Communications
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

ILBANK Grievance Mechanism: ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Sub-project. Complainants may - if they wish - submit their grievances to ILBANK as a higher authority through the following communication channels:

- **ILBANK Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **ILBANK E-mail:** uidbbilgi@ilbank.gov.tr and pybsosyal@ilbank.gov.tr
- **ILBANK Phone number:** +90 312-508 79 79 / +90 312 508 79 80
- **ILBANK Address for Petition Service:** ILBANK Department of Financial Institutions and Investor Relations, Environmental and Social Management Unit, GM Team (letters must be marked as personal or confidential) Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the sub-project will be registered in the GM database and managed as per GM Procedures, as

relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

6.2. Sub-Project Level Grievance Mechanism

Başakşehir Municipality handles public grievances and views through its website for Receiving Grievances (BİKÖM). This municipal GM system was established to receive grievances and requests from local citizens and intended to produce possible solutions within Başakşehir Municipality for reported concerns. Başakşehir Municipality's communication channels are provided below in Table 4.

Table 4. Contact Details of Başakşehir Municipality

Web page	Phone	Address for Official Letter	E-mail
https://www.basaksehir.bel.tr/	Call Center 444 0 669	Kayabaşı Mahallesi, 15 Temmuz Sokak No: 2 Başakşehir Merkez Camii Yanı, Başakşehir / İstanbul	belediye@basaksehir.bel.tr

Başakşehir Municipality actively uses the website³ for managing complaints, suggestions, and requests from the public in a more efficient digital manner. Through this platform, users can submit their complaints and suggestions, facilitating faster communication with the municipality. Please see **Error! Reference source not found.**

The screenshot displays the BİKÖM (Başakşehir Grievance and Request Management System) interface. The header includes navigation links: KURUMSAL, PROJELER, HİZMETLER, BAŞAKŞEHİR, BAŞAKŞEHİR BELEDİYESİ, TESİSLER, KÜLTÜR & SANAT, and İLETİŞİM. The main content area is titled 'BİKÖM' and 'Bize Ulaşın' (Contact Us), with the phone number 4440669. A sidebar on the left lists 'İLETİŞİM' (Communication) with sub-links: ADRES VE KROKİ BİLGİLERİ, FORMLAR, BİKÖM, and CİMER. The main form area has a dropdown for 'İçerik Türü' (Content Type) with options: BİLGİ, TALEP, TEŞEKKÜR, ÖNERİ, and ŞİKAYET. Below this is the 'Kişisel Bilgiler' (Personal Information) section with fields for TC Kimlik No, Doğum Tarihi (Day, Month, Year), Ad Soyad, Cep Telefonu, and E-Mail. There is also a checkbox for 'Bilgilerimi Gizle' (Hide my information).

Figure 6: Screenshot from the Başakşehir Municipality Website for Receiving Grievances

³ <https://www.basaksehir.bel.tr/bikom>

Apart from the ILBANK Grievance Mechanism and in addition to all existing GMs at national level, a grievance mechanism will be established by Başakşehir Municipality in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities as sub-project level. Grievance Mechanism (GM) as per WB will be implemented by Başakşehir Municipality throughout the lifetime of the sub-project including pre-construction, construction, and operation phases. Başakşehir Municipality PIU and construction contractor will be accessible for the stakeholders and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team. The personnel to be appointed by Başakşehir Municipality will record the grievances and requests coming from different channels in a single established system and will provide solutions within the time and application framework determined in as described above, within the scope of this subproject, there will be different levels of GMs to be operationalized by different institutions and subproject parties. All GMs to be utilized in this subproject will follow the process flow. The Başakşehir Municipality personnel will record all grievances received through different GM channels presented in this SEP (including all verbal and written grievances even through the grievance boxes installed in the municipal building and any stakeholder engagement event/meeting) in their GM log.

Başakşehir Municipality personnel to be assigned (Başakşehir Municipality GM Focal Point) will constantly be in contact with other Başakşehir Municipality experts, contractors, and personnel who will be involved in the operational phase. Additionally, the job description of Başakşehir Municipality personnel to be assigned will include the introduction of grievance mechanisms, which are publicly available and will be set up separately for employees, to relevant stakeholders.

Any grievances received by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to Başakşehir Municipality's call center and Başakşehir Municipality's subproject level grievance mechanism.

Samples of grievance form and grievance closure and consultation form prepared for use within the scope of the Sub-Project are given in Annex E and Annex F.

There will be different levels of GMs to be operationalized by different institutions and project parties. All GMs to be utilized in this Sub-Project will follow the process flow given in Table 5.

In addition to the central grievance channels of Başakşehir Municipality (call center, website, email), local access points will be established in Başakşehir to ensure the accessibility of the mechanism for affected communities. These will include grievance boxes and information boards at the mukhtar offices of the Bahçeşehir mechanism during public meetings and through the distribution of brochures and posters in İstanbul. This will ensure that residents who may have limited access to online tools are also able to submit grievances.

Table 5. Grievance Mechanism Flow Chart

Grievance Process	Requirement / Action
Submission of a complaint	Receiving the grievance by any communication channel explained above. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2days after receiving of the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the Sub-project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”)
Registration of complaint	Registering/recording through making an entry in the sample grievance register table. All the complaints will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously, and the request will be met.
Forwarding of complaint	The complaint is forwarded to relevant people (site manager on construction sites and experts of the PIU) responsible for handling the complaint in not later than three working days upon receiving the complaint (except for any emergent complaint, which would be handled as appropriate).
Evaluation of a complaint	Evaluating the complaints within 10 working days and determining whether the complaint meets the admissibility criteria.
Response for a complaint	If the complaint is valid, identify and taking corrective measures for resolving the complaint in not later than 15 working days upon receiving. If resolving the complaint took longer, a partial response could be provided to the complainant and fill the Grievance Closeout Form All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. At this point, it should be noted that the action taken, and the result of this anonymously recorded grievance should be shared on the Başakşehir Municipality website, so that anonymous complainants is informed about their complaint and the results.

Grievance Process	Requirement / Action
Recording the result of a complaint	Recording the result of the complaint on the register table.
Right to Appeal	If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follows: • Civil Courts of First Instance • Administrative Courts • Commercial Courts of First Instance • Labor Courts, and • Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

The officer appointed by Başakşehir Municipality for the Public Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form (Annex E). Moreover, on the basis of their contents, by Başakşehir Municipality PIU and that the corrective/regulatory action to be taken is acceptable to Grievance Mechanism Contact Person (GMCP) of Başakşehir Municipality PIU. Such responses to the grievances would be satisfactory for both parties, and activities would be followed, and the complainants would be informed on the outcomes of the corrective activities. Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Annex F). Thus, all activities carried out under the grievance mechanism will be recorded and care will be taken to establish a transparent relationship between the public and Başakşehir Municipality.

In case the grievance is raised anonymously, a summary of the grievance and resolution will be posted on the Başakşehir Municipality's website and on notice boards located around the Sub-Project Administrative Building in construction area as well as in the headman's offices in the settlements that are anticipated to be affected.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Sub-Project 's lifespan. All stakeholders initiating grievance will have an opportunity to claim their case in a confidential manner. Başakşehir Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

Management of Sexual Exploitation and Abuse/Sexual Harassment issues

Since there are special procedures/principles for handling sensitive content grievances (i.e. sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in Sub-Project areas), these grievances will be handled centrally at ILBANK, not at the Başakşehir Municipality or Contractor level⁴.

ILBANK's GM procedure has been prepared in accordance with WB ESF/ESS10 and it also complies with the World Bank's environmental and social standards⁵. In case a sensitive complaint is received⁶ by the Contractor or Başakşehir Municipality, they will be responsible for conveying the issue directly to the ILBANK GM focal point. However, Contractor and Başakşehir Municipality should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

Başakşehir Municipality official who will manage the GM will be knowledgeable about the guidelines prepared by the WB to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in negative reactions from the community. It is highly important that the victims raising grievances involving these issues can do so anonymously. In addition, the authorities handling grievances should address such issues within confidentiality and with an unbiased approach and to ensure such grievances should be handled through a separate procedure. All stakeholders who have lodged a grievance may request that their applications be assessed in confidentiality. Başakşehir Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

6.3. Grievance Mechanism for Workers

Workers' Grievance Mechanism is defined as complaints from sub-project employees (including both direct and indirect employees). This mechanism is structured with the intention

⁴https://www.ilbank.gov.tr/storage/uploads/pagefiles/rev3_esmf_tefwer_draft_ilbank_25052023_clean_1685431185.pdf

⁵ WB's ESSs: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

⁶

https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_uluslararasi_projeler_sikayet_mekanizmasi_proseduru_1646748134.pdf

of it being an effective approach for early identification, assessment, and resolution of grievances throughout the sub-project's lifespan. The Grievance Mechanism should guarantee that any employee raising a complaint will not be subject to any reprisal.

The scope of the Worker Grievance Mechanism can be summarized as follows, but not limited to; occupational health and safety, labor conditions, wages, problems with the local community or co-workers, hygiene problems in common areas, insufficient food and/or worker safety, etc.

The GM will be informed to all sub-project workers through written and verbal communications. Each worker should be informed about the GM at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is very important to some employees; therefore, workers can submit their complaints anonymously, there are no restrictions in this regard. If an anonymous complaint is received, the corrective action taken against the complaint or the response to the complaint will be announced by posting it in appropriate areas in the containers that workers will use.

Başakşehir Municipality communication tools, the following communication channels can be used to convey complaints from workers:

- Grievance boxes will be placed at designated points within the construction sites, ensuring accessibility and confidentiality for workers to submit their grievances anonymously.
- Direct contact with site managers at construction sites will remain available for workers to voice their concerns. Site managers will be responsible for documenting and forwarding grievances to the relevant authorities.
- Meetings and formal/informal consultations will be conducted regularly to allow workers to express their grievances. These sessions will be structured to ensure confidentiality and prevent any potential reprisal against workers raising concerns.

The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms that will be placed in the containers. The responsible staff of Contractor will record all grievances that received at the construction site and convey to the sub-project GM officer for further action and resolution. It is important to note that sub-project employees will retain their right to access the public grievance mechanism for non-employment-related matters.

If any worker is not satisfied with the solutions offered by the E&S Team in Başakşehir Municipality PIU or requires further clarification at a higher level, they can submit their grievances or requests through the contact addresses provided below. Workers can confidentially submit grievances to their supervisor, the HR Department, or the E&S representative without fear of retaliation. All grievances will be handled with confidentiality and impartiality, ensuring fair and transparent resolution processes.

The detailed procedure of the labor grievance mechanism will be described in the subproject specific LMP.

The officer appointed by Başakşehir Municipality for the Workers' Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form Annex E). Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Annex F). Thus, all activities carried out under the grievance mechanism will be recorded and care will be taken to establish a transparent relationship between workers and Başakşehir Municipality.

7. MONITORING AND REPORTING

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

Başakşehir Municipality will implement the monitoring activities throughout the lifetime of the subproject. This SEP will be updated upon receipt of feedback from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedback. In addition, SEP will be updated in case of major changes that may arise in the scope of the Sub-Project that may affect the stakeholder engagement activities. Apart from these, a summary of the implementation of the Grievance Mechanism (GM) will be published annually on the Başakşehir Municipality's website⁷ after removing the identity information of the persons to protect their identity. Monthly summaries of complaints, queries and related incidents, together with the status of implementation of corrective/preventive actions, shall be prepared by the Contractor during the construction phase and by Başakşehir Municipality during the operation phase. These summaries shall be included in the monthly ESMRs to be prepared by the Contractor during the construction phase of the subproject for submission to the Başakşehir Municipality. Furthermore, the Contractor shall promptly forward the complaints to the Subproject Owner in addition to summarizing them in the monthly ESMRs. The monthly summaries/reports shall be a means of assessing both the number and nature of complaints (if any) and the ability of Başakşehir Municipality and the Contractor(s) to address the complaints in a timely and effective manner. As for incidents, the Contractor shall be responsible for promptly reporting to the Subproject Owner any unexpected events such as environmental, social and labor issues or accidents, incidents or loss of time and maintaining an incident log on site throughout the life of the subproject.

Monthly ESMRs will be prepared by the Contractor for submission to Başakşehir Municipality. Quarterly ESMRs and six-monthly sub-project Progress reports will be prepared by Başakşehir Municipality and submitted to ILBANK together with the Complaint Register. Six-monthly ESMRs and sub-project Progress reports will be prepared by ILBANK for submission to WB. These reports will include a summary of the sub-project's performance in health, safety, environmental and social issues management, grievance mechanism and stakeholder engagement activities conducted within the specified period. All efforts for effective implementation of the GM will be documented using forms and records in the sub-project

<https://www.basaksehir.bel.tr/>

specific SEP and will be evaluated and reported against the specified KPI targets. It should also be noted that the personal information of the complainant using the GM will remain confidential and will never be shared in these reports.

The reporting process requirements and distribution of roles given in the Table 6.

Table 6. Reporting Process Requirements and Distribution of Roles

Responsible Party	Roles & Responsibility
PIU	- Oversee overall subproject implementation and compliance with national and WB standards. - Coordinate with stakeholders and ensure effective communication. - Review and approve reports submitted by the Construction Supervision Consultant and Contractor. - Conduct regular monitoring and evaluation of subproject activities.
Construction Supervision Consultant	- Monitor construction activities and ensure adherence to subproject specifications and standards. - Prepare and submit regular progress reports to the PIU. - Conduct site inspections and document findings. - Identify and report any deviations from the subproject plan or standards to the PIU.
Contractor	- Implement subproject activities according to the approved plan and schedule. - Maintain records of construction activities, materials used, and labor employed. - Submit daily/weekly progress reports to the Construction Supervision Consultant. - Address any issues or concerns raised by the Construction Supervision Consultant promptly.

7.2. Reporting back to stakeholder groups

During the Sub-project's development and construction phases, the construction contractors will prepare brief monthly reports on environmental and social performance for Başakşehir Municipality Management which will include an update on implementation of the stakeholder engagement plan and include indicators in this section. The monthly reports will be shared with ILBANK.

Başakşehir Municipality's Social Affairs Manager will report back to stakeholder groups, primarily through public meetings in sub-project affected municipalities and/or Neighborhoods. Minutes of meetings will be shared with the participants during subsequent public meetings. The summary will be published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data. Feedback received through the GM will be responded to in writing and verbally. Key sub-project updates will be posted on Başakşehir Municipality's website.

ANNEXES

Annex A Site Visit Photographs

Annex B Sample Grievance Submission Form

Annex C Sample Grievance Closure Form

Annex D – Sample Grievance Log Form

Annex E – Sample Consultation Form

Annex A Site Visit Photographs





Annex B Sample Grievance Submission Form

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

Registrant Name Surname/Signature	Complainant Name Surname/Signature
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Annex C Sample Grievance Closure Form

 BAŞAKŞEHİR BELEDİYESİ	Başakşehir Municipality SOLAR POWER PLANT PROJECT	
	GRIEVANCE CLOSE OUT FORM	
Reference form:		
1. DETERMINATION OF CORRECTIVE ACTION		
1	Form of Communication	
2	Telephone / Toll Free Lin ☐	
3	Face to Face Meeting ☐	
4	Website / Email ☐	
5	Other (Explain) ☐	
2. CLOSE OUT THE GRIEVANCE		
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>		
Name Surname / Signature of the Person Closing the Grievance/Date	Name Surname / Signature of Complainant/Date	

Annex D Sample Grievance Log Form

No	Grievance Register Number	How Grievance is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Municipality/Utility Level, Regional)	Date of Grievance Received	Location of Grievance Received	Name of Person Receiving Grievance	Land Parcel # (If grievance is related to land)	Complainant Information					Project Component Related to Grievance	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Grievance Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
								Name/Surname	ID Number	Telephone/email	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken	
1																					

Annex E: Sample Consultation Form

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

