



Süper Film Packaging Industry and Trade Inc.
Süper Film Biaxially Oriented Polypropylene
Production Plant Investment Project

Stakeholder Engagement Plan

(Plan No: SPR-PLN-SOC-SEP-001)

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List of Abbreviations

Aol	Area of Influence
BOIZ	Büyükkarıştıran Organized Industrial Zone
BOPP	Biaxially Oriented Polypropylene Production
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
ICP	Informed Consultation Participation
IFC	International Finance Corporation
km	Kilometer
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OIZ	Organized Industrial Zone
Project Company	Süper Film Packaging Ind. and Trade Inc.
PAP	Project Affected People
PS	Performance Standard
SAS	Social Affairs Staff
SEP	Stakeholder Engagement Plan
The Project	Süper Film Biaxially Oriented Polypropylene Production Plant Investment Project
TKYB	Development and Investment Bank of Turkey

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for “Süper Film Biaxially Oriented Polypropylene Production Plant Investment Project” (“Project”) located in Lüleburgaz District of Kırklareli Province.

This SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project as per the national legislation, International Finance Corporation (“IFC”) Performance Standards (“PS”s) and Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy (“ESP”). The reference number of this Plan is SPR- PLN-SOC-SEP-001.

This is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

1.1 Background

Super Film *Packaging Industry and Trade Inc.* has been continuing its production activities since 1993 on an area of 63.000 m² in Gaziantep Başpınar Organized Industrial Zone. There are 70,000 tons/year BOPP production lines, 48,000 tons/year BOPET, 6,000 tons/year multi-layer barrier film and CPP and 39,000 tons/year metallized production lines. In addition, having an adhesive tape production facility with a capacity of 240,000,000 m²/year, Süper Film is one of the world's leading packaging film manufacturers, producing a wide variety of packaging films under one roof. In addition to Turkey's first and only extrusion (thermal) coating line, it invested in special coated products with a new coating line with a capacity of 12,000 tons/year in 2015. With its new Metallized line, which came into operation in April 2022, it increased its annual metallized film production to 39,000 tons. With the 60,000 tons/year capacity Lüleburgaz facility planned to be opened by the end of 2023, it aims to increase the annual BOPP film production to 130,000 tons and the total flexible film production to 184,000 tons/year.

Super Film Packaging; is a Sanko Holding company. The partnership structure of the company consists of Sanko Holding and Sanko *Textile* partnership. In addition, it has two subsidiaries, Süper Film Europe and Süper Film America, for sales and marketing activities.

The facility to be established in the Lüleburgaz district of Kırklareli is the BOPP line with a capacity of 60,000 tons/year, as mentioned above. The reasons such as the expectation of a 4% increase in the global demand for BOPP flexible films in the next 5 years, the increase in

Super Film sales volumes, and the contribution to the technological transformation were effective in the investment decision. Since the export volume of the company is expected to increase, the Thrace region was preferred as the investment region. The construction works for the Lüleburgaz facility started in July 2022 and it is planned to complete the construction phase in July 2023 and the facility to start operating in December 2023.

1.1.1 Project Location and Area of Influence (Aoi)

The location of the Project Area is in Büyükkarıştıran Organized Industrial Zone (BOIZ) within administrative borders of Lüleburgaz District of Kırklareli Province. There are industrial facilities in the region that carry out similar activities with the planned Project. The Project area is considered as an area of influence (“Aoi”) with a radius of 1 km since similar studies will be carried out with the existing activities within the scope of the Project. Area of Influence; Access roads will be evaluated taking into account environmental and social impacts, including existing buildings and infrastructures. Figures 1-1 and 1-2 below show the locations and impact areas of the Project.

Table 1-1. Information on Closest Settlements within the Aoi

Settlement District and Province	Distance to the Project Area (km)	Direction	Population		
			Total	Male	Female
Yıldırım Neighborhood Lüleburgaz / Kırklareli	~1	Northwest	2309	1173	1136
Yeni Neighborhood Lüleburgaz / Kırklareli	~2	Northwest	921	483	438

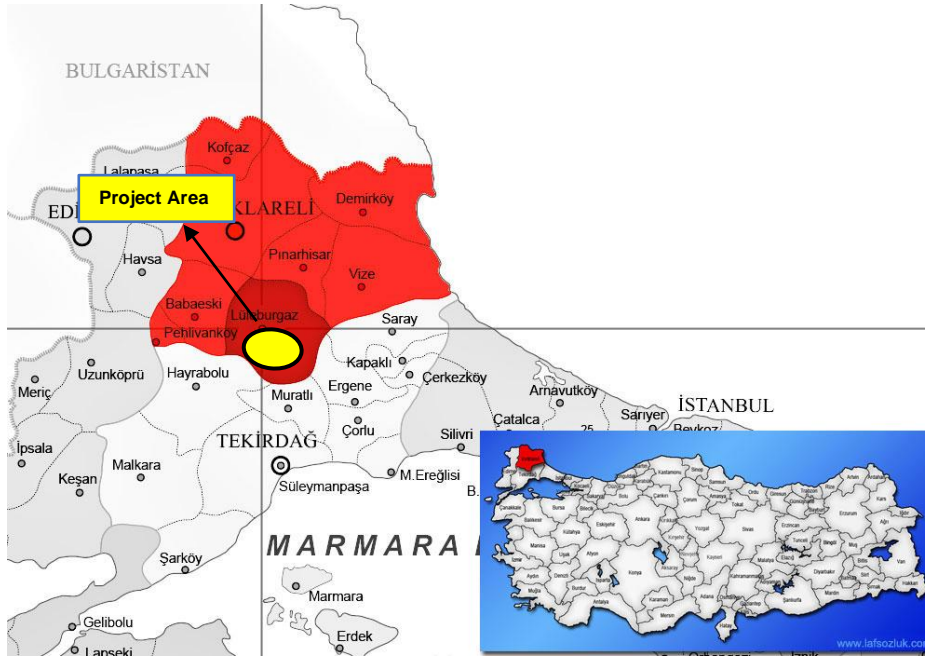


Figure 1-1. Project Location Map

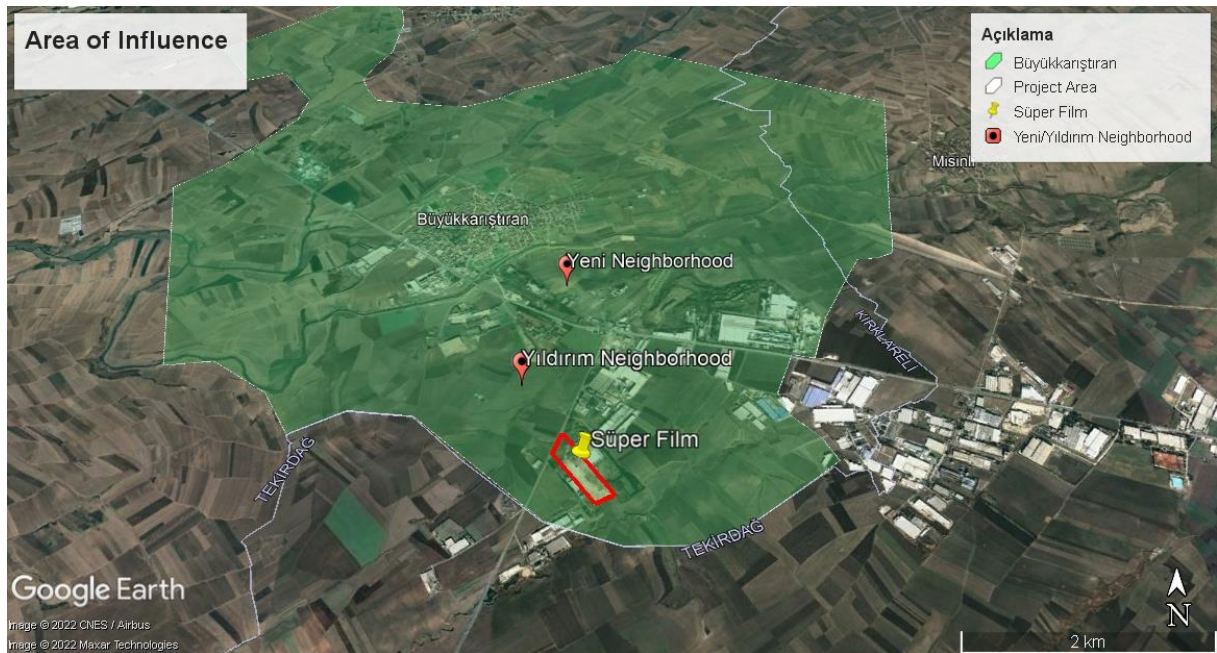


Figure 1-2. Area of Influence (AoI)

1.2 Purpose

The goal of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders. The purpose of this SEP is to:

- identify stakeholders and their interest to the Project,
- set out applicable management interfaces,

- define roles and responsibilities,
- outline the applicable project standards relevant to this Plan,
- define Project commitments, operational procedures and guidance relevant to this Plan,
- define monitoring and reporting procedures, including the key performance indicators (KPIs) of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,
- outline communication tools.

This Plan also aims to create long-term relations between the Project and local communities based on mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, its investments, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

Another goal of this SEP is to describe the most effective methods by:

- keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
- understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.3 Scope

This Stakeholder Engagement Plan covers all Project activities including associated facilities and contractors' activities during the operational phase of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

This Plan is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- Grievance Mechanism Procedure (Internal and External) (SPR-PRC-SOC-GMP-001),
- Emergency Response Plan (SPR-PLN-HSE-ERP-002),
- Occupational Health and Safety Management Plan (SPR-PLN-HSE-OHSMP-003),
- Air Quality Management Plan (SPR-PLN-ENV-AQMP-001),
- Waste Management Plan (SPR-PLN-HSE-WMP-001).

1.4 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally Appropriate	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.

Vulnerable People

People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section. Key roles and responsibilities for the implementation of this Plan are outlined in Table 2-1.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> • Approval of this SEP, • Ensures this SEP will be implemented during the lifetime of the Project, • Determining the policies and targets regarding the social communication and stakeholder engagement, • Approval of the social budget of the Project determined and submitted by Social Affairs Staff (“SAS”).
Factory Manager	<ul style="list-style-type: none"> • Having overall responsibility for the implementation of this SEP by fulfilling the Project requirements together with SAS, • Approval of resources determined and submitted by SAS and required for implementation of this plan, • Coordinates with parties for proper implementation of this SEP, • Reports to the Top Management about performance of the system, • Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked, • Making the final decision concerning internal and external grievances, (if needed) in terms social issues in the light of the assessments of the Social Affairs Staff (SAS).
Environment Representative	<ul style="list-style-type: none"> • Determining the environmental impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Ensuring that all provisions in the Contractor engagements regarding environmental requirements as per the Project Standards during the operation phase and auditing the performance of the Contractors on those requirements, • Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding environmental issues. •

Roles	Responsibilities
<p>Social Affairs Staff (SAS) / Human Resources (HR) and Administrative Affairs Specialist</p>	<ul style="list-style-type: none"> • Implementing this SEP and GMP, • Ensuring the Project’s compliance with the national and international standards and requirements set out in this Plan, • Reporting to the Factory Manager about the system performance, • Recording all formal and informal engagement activities with local communities in DCC, • Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports, • Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement reports, • Forming relationships with the Project stakeholders, • Organizing stakeholder meetings to collect the grievances, concerns and/or requests actively as required, • Providing regular reporting back to the community on the management related to community grievances, • Determining and providing the necessary training materials for all employees, • Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.), • Searching the causes of the grievances and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities, • Monitoring all complaints and ensuring that all complaints are resolved and closed properly in a timely manner, • Following the results of complaint and reporting on a weekly, monthly and annual basis, • Recording and reporting general and local employment rates and complaints which are received verbally or observed visually, • Fills out the “Complaint Register Form” & “Consultation Form” (see <i>Appendices A and B</i>), • Giving the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 days that the grievance solution process has started and after the grievance closed).
<p>Occupational Health and Safety Specialist</p>	<ul style="list-style-type: none"> • Determining the OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Ensuring that all provisions in the Contractor engagements regarding HS requirements as per the Project Standards during the operation phase and auditing the performance of the Contractors on those requirements, • Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding health and safety issues.

Roles	Responsibilities
Contractor Representatives / Project Responsible	<ul style="list-style-type: none"> Ensuring that all requirements in this SEP are complied with.
Contractors / Subcontractors / Suppliers & Employees	<ul style="list-style-type: none"> Not making any commitment in their interactions with the stakeholders beyond their competence, Complying with the requirements of this SEP and other relevant Management System documentation of the Project.

3 PROJECT STANDARDS

This SEP is prepared based on national and international requirements and standards. During the lifetime of the Project, “Project Standards” will be followed which consist of:

- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- Environmental and Social Policy of TKYB,
- Applicable international standards and guidelines, and
- Interim advice on “Safe Stakeholder Engagement in the context of COVID-19” by IFC.

3.1 Applicable National Standards

The Constitution of The Republic of Turkey

The main document of the national requirements and standards is “The Constitution of The Republic of Turkey” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

I. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

III. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

IV. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

V. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labor Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development.

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 29 July 2022, no 31907) is defined which includes a limited public disclosure process. The purpose of the environment law is to protect and improve the environment which is the common asset of all citizens; make better use of, and preserve land and natural resources in rural and urban areas; prevent water, land and air pollution; by preserving the country's vegetative and livestock assets and natural and historical richness, organize all arrangements and precautions for improving and securing health, civilization and life conditions of present and future generations in conformity with economic and social development objectives, and based on certain legal and technical principles.

When it comes to the public consultation requirements, it is mandatory to hold at least one public participation meeting for the Projects which is under the Annex-I of the EIA Regulation, while no requirement is needed for the projects under the Annex-II of the same regulation.

Similarly, according to the EIA Regulation, which entered into force with the Official Gazette dated 29.07.2022 and numbered 31907, a 'Stakeholder Engagement Plan' should be added to the EIA Application File. Whereas, SEP is not required to be added to the 'Project Introduction Files', which are prepared for the projects under the Annex-II list of the EIA Regulation.

3.2 Environmental and Social Policy of TKYB

Within this scope, the TKYB closely follows and implements national legislation, laws and regulations to manage its environmental and social impact while fulfilling its legal obligations. It consistently follows national and international developments within the industry and best practices in environmental and social issues. The Bank supports and joins all kinds of environmentally friendly activities and volunteering efforts particularly concerning education and the environment, along with all public and civil society organizations as well as other shareholders who enhance social prosperity and development.

While reducing its negative impact stemming from operational activities, the Bank supports positive environmental movements with its efforts to increase energy and resource efficiency. To this end, the Bank regularly monitors energy, water and paper use, air emissions, waste generation and greenhouse gas emissions and aims to improve its reduction performance.

The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,
- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system, Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

3.3 Applicable International Standards, Legislations and Guidelines

Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement are indicated on the below Figure.

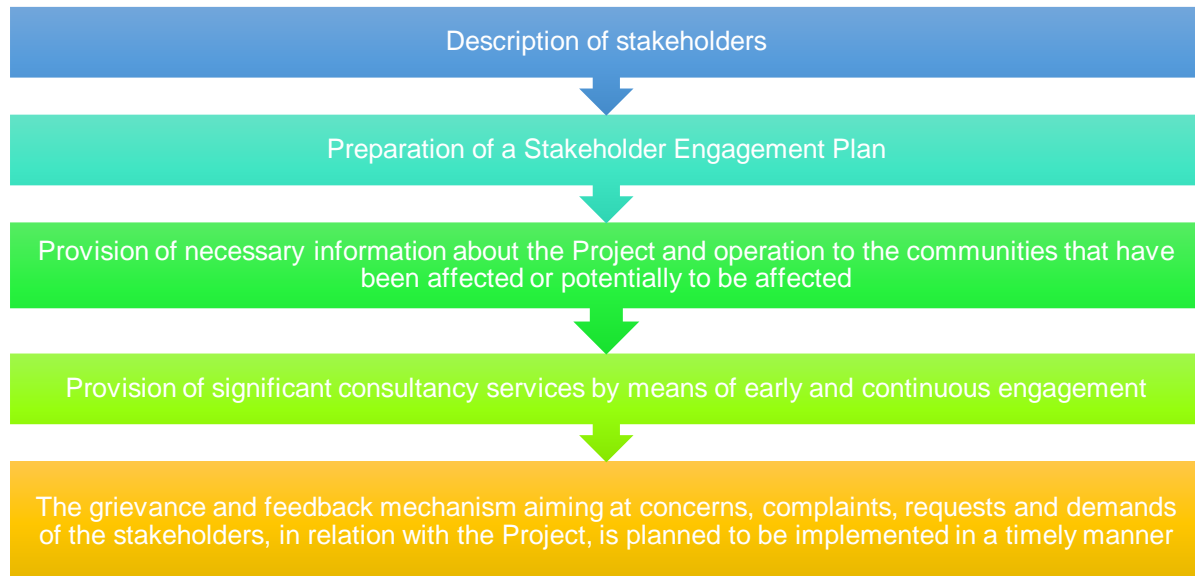


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

International standards to be followed by the Project is the IFC Performance Standards. Particularly, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement. Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties influencing, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them,
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it,
- To review this database in consultation with relevant parties,
- To provide necessary information and consultancy services to all stakeholders by facilitating their required contributions on the environmental and social issues that may affect them,
- To continuously protect respectful and constructive relations with stakeholders based on mutual confidence and honesty, and by respecting the values of the stakeholders.

3.3.1. IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

- An Environmental and Social Management System (“ESMS”) should be prepared and implemented, and the element of stakeholder engagement should be included,

- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided 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; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation is to be conducted.

IFC has defined “Key Concepts and Principles of Stakeholder Engagement” in its A Good Practice Handbook. The building blocks of stakeholder engagement are listed below:

- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders.

3.4 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

The Project located in Büyükkarıştıran Organized Industrial Zone, which is one of the facilities of Süper Film, has been evaluated in accordance with the Annex-1 and Annex-2 lists within the national EIA legislation. As a result of the evaluation, the facility was found out of the scope of both lists and the "Out of Scope" letter given in Appendix C was given by Kırklareli Provincial


Directorate of Environment and Forestry (Kırklareli Provincial Directorate of Environment, Urbanization and Climate Change) in 2020. These documents have been taken according to the Turkish EIA Regulation, which has been repealed.

In the scope of the Environmental and Social studies performed by MGS, interviews and/or face-to-face meetings have been performed with Regional Director of Büyükkarıştıran Organized Industrial Zone on 2nd of December 2022. The aim of those meetings was to obtain information about the Project activities and stakeholder engagements conducted up to know.


In addition, face-to-face meetings were held with the mukhtar of Yıldırım Neighborhood to obtain information on the socio-economic structure of the region through specifically prepared surveys. Moreover, call interview held with the mukhtar Yeni Neighborhood for ensuring the same objectives.


A summary of this study and consultation photos are provided in the Table 4-1.


Table 4-1. Summary of the Early Engagement Activities


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Local Community	Mukhtar of Yildirim Neighborhood	02.12.2022 Mukhtar's Office	<ul style="list-style-type: none"> The population of the neighborhood is 1650 people, and the population has increased in the last five years. The reason for the increase in the population is the immigration from the villages and cities such as Istanbul and Çorlu. The reason for the migration is the factories in the region. There are 110 factories. There are also refugees in the neighborhood. The residents of the neighborhood are mostly young people. The school facilities and numbers in the neighborhood are sufficient. The education level of the residents of the neighborhood is mostly high school graduates. The livelihoods of the people in the neighborhood are mostly farming, labor and craftsmanship. Job opportunities in the neighborhood have increased in the last five years. There is no communication with the company. It is thought that face-to-face communication can be established. If contact is made, young people in the neighborhood can be directed there for work. There are families living on aid in the neighborhood. The company can provide benefits for the poor in the neighborhood. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Local Community	Mukhtar of Yeni Neighborhood	12.12.2022 On the Phone	<ul style="list-style-type: none"> • Neighborhood population is about 9000. • The population has increased in the last five years. The reason for this may be the railway station under construction and the factories in the OIZ. • The age group in the neighborhood is mostly young-middle-aged. • The neighborhood is the smallest neighborhood in Büyükkarıştıran. There is one primary school. • The education level of the residents is mostly high school and university graduates. • Neighborhood residents earn their living from farming, retirement and factory work. • There are neighborhood residents living alone and with assistance in the neighborhood. These households are reached for assistance. The mukhtar works to provide food and financial aid to those in need. • The company has not contacted the mukhtar before. • It is stated that it is possible to meet by phone or face to face. • When the factory will start production, the mukhtar can be contacted to find staff to work. • The company can provide support to help those in need. • There is no complaint about Super Film, and no complaints from the locals. 	Due to the fact that the interview was conducted via telephone, no photo could be taken with the mukhtar.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Büyükkarıştıran OIZ	OIZ Director	02.12.2022 Director's Office	<ul style="list-style-type: none"> • He has information about the company's field of activity. • Face-to-face communication is established. • Direct communication is established with the managers themselves. Information is also obtained through reports. • The cooperation between the company and the OIZ is seen in the areas of supervision, licensing, and employment. • It is thought that face-to-face meetings and communication are more effective. • The work of the firm has positive effects in terms of employment. In addition, the fact that it is different as a sector and that high technology will be used are also positive aspects. • There is no expected negative impact from the project. It is a clean facility, there is no waste, water use is given importance and pollution is low. • OIZ does not have any social responsibility projects that it carries out. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Employee of the Project	OHS Specialist	02.12.2022 Super Film's Infirmary	<ul style="list-style-type: none"> • Working here for five months. • He works under Megatrak company. • Working hours are from 08:00 to 17:30 and also work on Saturdays. • Transportation to the workplace is provided by the company's service vehicle. The service stop is close to the employee's home. The employee is satisfied with this service. • Meals are eaten at work. The meals are hearty and sufficient. There was no discomfort caused by meals. • There is no problem in using permission. • In the workplace, trainings such as business and risk analysis were received. • The employee finds the salary sufficient and can receive it regularly. • There are no fringe benefits other than salary. • When there is a problem in the workplace, the manager is contacted verbally. • Occupational health and safety measures are sufficient. • There is a one-hour lunch break, and this time is spent productively. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Employee of the Project	Map Technician	02.12.2022 Super Film's Infirmary	<ul style="list-style-type: none"> • Working here for seven months. • He works under Poligon company. • Working hours are from 08:00 to 17:30. • Transportation to the workplace is provided by the company vehicle used in the field. • The employee is satisfied with the meals and no discomfort has been experienced. • There is no problem in using permission. • Trainings on OHS and waste materials were received at the workplace. • The employee finds the salary sufficient and receives it regularly. • Apart from the salary, bonuses are given on holidays and at the end of the year. • When there is any problem in the workplace, the superiors are contacted verbally. • OHS measures are sufficient. • There is a one-hour lunch break, and this time is spent productively. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Employee of the Project	Other Health Personnel	02.12.2022 Super Film's Infirmary	<ul style="list-style-type: none"> • Working here for four months. • He works under Megatrak company. • Working hours are between 08:00-18:00. He also works on Saturdays. • Transportation to the workplace is provided by company vehicle. • The employee is satisfied with the meals and no discomfort has been experienced. • There is no problem in using permission. • Basic occupational safety training was received at the workplace. • The employee finds the salary insufficient and receives it regularly. • When there is any problem in the workplace, the superiors are contacted verbally. • OHS measures are sufficient. • Break times are flexible. • Occupational accidents are common when there are people who do not follow the rules in the workplace. People come here mostly for minor injuries. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Interview Photos
Employee of the Project	Security Personnel	02.12.2022 Super Film's Infirmary	<ul style="list-style-type: none"> • Working for Sanko private security firm for four years. • Working in shifts between 07:00-19:00. Leave is used instead of overtime hours. • Transportation to the workplace is provided by service. The service stop is close to the employee's home and the employee is satisfied with this service. • Meal cards are used for meals. • There is no problem in using annual leave. • OHS and legal trainings were received at the workplace. Due to being an armed security personnel, the certificate must be renewed every 5 years. • The employee finds the salary sufficient and receives it regularly. • Apart from the salary, there is supplementary health insurance. At the same time, bonuses are given on holidays. Food aid is also available on religious holidays. • When there is a problem in the workplace, it is reported to the superiors with the succession method. • OHS measures are sufficient. • There is a break period of 1 hour and this time is spent efficiently. • The employee is satisfied with the working conditions. 	

4.2 Stakeholder Identification

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening a wide array of potential stakeholders, including institutions, associations, Non-governmental Organizations (“NGOs”) and other informal groups, that should be involved in the engagement process.

The stakeholders were classified according to their type and status. The identified stakeholders are presented in Table 4-2.

Table 4-2. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<i>External Stakeholders</i>		
Local Communities (Settlements in the Aol)		
Mukhtars and residents of the following neighborhoods <ul style="list-style-type: none"> • Yıldırım Neighborhood (Lüleburgaz / Kırklareli) • Yeni Neighborhood (Lüleburgaz / Kırklareli) 	✓	
Government		
<ul style="list-style-type: none"> • Kırklareli Provincial Directorate of Environment, Urbanization and Climate Change • Kırklareli Provincial Directorate of Agriculture and Forestry • Kırklareli Provincial Directorate of Culture and Tourism • Kırklareli Provincial Directorate of Health • Kırklareli Provincial Directorate of Family, Labor and Social Services • Governorship of Kırklareli • Sub-Governorship of Lüleburgaz District 		✓
Municipality		
<ul style="list-style-type: none"> • Kırklareli Municipality • Lüleburgaz Municipality 	✓	✓
NGOs		
<ul style="list-style-type: none"> • Kırklareli Chamber of Commerce and Industry • TEMA Foundation Lüleburgaz Branch 		✓
Local Media		
<ul style="list-style-type: none"> • Yeşilyurt Newspaper • Görünüm Newspaper 		✓
<i>Internal Stakeholders</i>		
<ul style="list-style-type: none"> • Süper Film Employees • Contractors/Subcontractors/Suppliers 	✓	✓

4.3 Stakeholder Engagement Program

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the Project activities, including Project performance, Project development and investment plans and their implementation.

The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan,
- Meetings with regulatory bodies,
- Public meetings,
- Published on local municipalities' website (if available) and/or on a dedicated Project website,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

- Stakeholder groups to be consulted,
- Engagement topics,
- Type of information disclosed / engagement methods,
- Frequency and responsible.

Table 4-3. Stakeholder Engagement Program

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>Information Disclosure</u></p> <ol style="list-style-type: none"> 1. Purpose, start date, duration, and nature of operations activities, 2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts, 3. Impacts on local communities, 4. Grievance mechanism disclosure, 5. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results, 6. Continue disclosing information via the Project company website. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SAS
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>External Grievance Mechanism</u></p> <ol style="list-style-type: none"> 1. Disclosure of grievance mechanism to communities, 2. Disclosure of grievances received and resolved to communities. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	SAS
Local business and industries All affected settlements and mukhtars Project Workers	<p><u>Employment and Procurement Strategies</u></p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Procurement of supplies and services. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SAS
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>Use of Emergency Response and Preparedness</u></p> <ol style="list-style-type: none"> 1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders, 2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	Drills Workshops Community meetings	Annual drill programs or as required	Environment Representative SAS

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
NGOs	<p><u>Social progress, economic and social development, and environmental protection</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> Mitigation measures against potential environmental and social risks, Sustainability criteria, Social responsibility projects, implementation principles. 	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	As required / As requested	SAS
<p>Local industries</p> <p>All affected settlements and mukhtars</p> <p>Lüleburgaz Municipality</p>	<p><u>Road Transportation and Traffic Safety</u></p> <ol style="list-style-type: none"> Road safety awareness, including on safe crossing of the bypass and access roads, Types, number, and frequency of vehicles that can be anticipated through different phases of the Project, Collaboration with local communities and responsible authorities to improve signage, visibility, and overall safety of roads, particularly along stretches located near schools or other locations where children are present, Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), Communication of traffic measures and Project road usage with mukhtars and other industries. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	As requested, / as needed for others	<p>SAS</p> <p>Environment Representative</p>
<p>All affected settlements and mukhtars</p> <p>Lüleburgaz Municipality</p>	<p><u>Management of environmental and social risks of the Project</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> Environmental and social monitoring program Environmental and social monitoring results Overall information about progress of the Project 	<p>Meetings with Mukhtars</p> <p>Brochures</p> <p>Workshops</p>	As required / As requested	<p>SAS</p> <p>Environment Representative</p>

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Vulnerable Groups	<p><u>Employment and any other interest of vulnerable groups</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Use of roads, water, and other infrastructure, increase in traffic density, 4. Local employment, 5. Important commercial opportunities, 6. Environmental impacts. 	<p>Meetings targeting any identified vulnerable groups</p> <p>Women meetings and focus group discussions</p>	<p>Meetings during the operation</p> <p>As requested / as required for other meetings</p>	SAS
<p>Workforce</p> <p>All affected settlements and mukhtars</p> <p>Local industries</p> <p>Local government</p> <p>Lüleburgaz Municipality</p>	<p><u>Community Health</u></p> <ol style="list-style-type: none"> 1. Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities, 2. As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually face to face meetings</p> <p>As requested / as needed for others</p>	SAS
<p>Employees of the Project</p> <p>Project Contactor employees</p>	<p><u>Employee welfare</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures, 4. Contractor management. 	<p>Face to face interview</p> <p>OHS Board</p> <p>Labor audits</p>	<p>Monthly or when required due to the results of grievance mechanism</p>	<p>SAS</p> <p>Environment Representative</p>

4.4 Tools & Methods for Information Disclosure

The Project will provide transparent informative material to the affected communities and the stakeholders in a consistent and timely manner. The manner in which this material will be disclosed as discussed in the sections below.

4.4.1 Internal / Website

Project specific web site (<https://www.superfilm.com/>) will keep information on the operations updated on an assigned webpage in Turkish and English.

On the Project website, there is Contact Form for receiving the complaints or suggestions (see *Figure 4-1*).

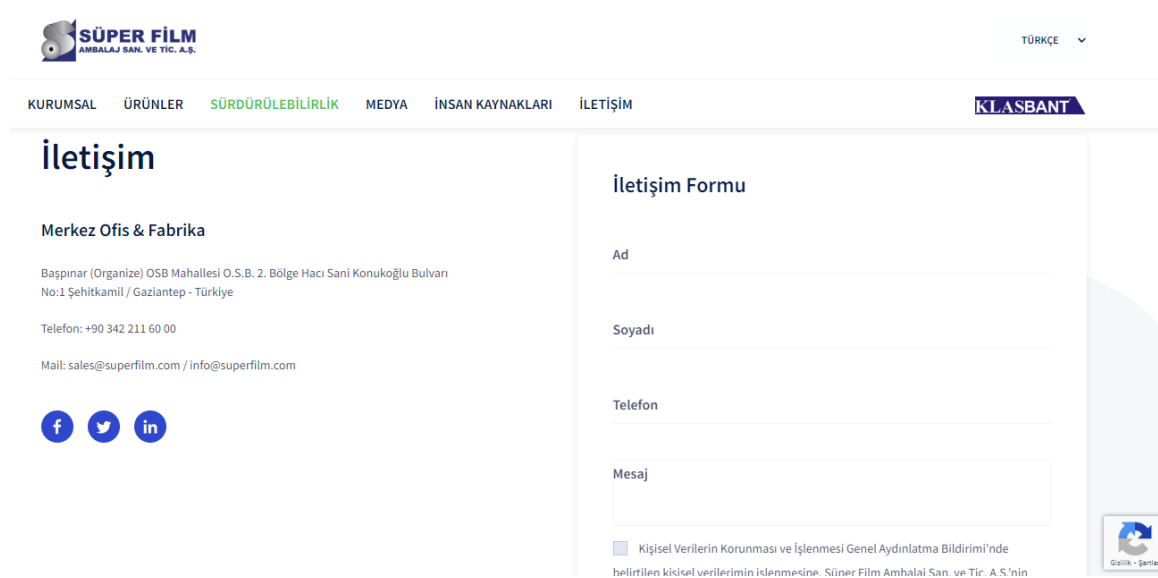


Figure 4-1. Contact Form of Süper Film

The physical address, telephone number and e-mail address of the Project owner are given. The physical address and other contact information of the other communication offices shall be given on the website (see *Figure 4-2*) below.

Moreover, informative brochures, Grievance Mechanism Procedure and Stakeholder Engagement Plan shall be disclosed on this assigned website for the Project.

The screenshot displays the 'Dünyada Süper Film' section of the website, which lists contact information for communication offices in four locations:

- İSTANBUL / TÜRKİYE**: Gülbahar Cad. 15 Temmuz Mah. No:43 Güneşli - Bağcılar / İstanbul. T: +90 342 211 60 00, F: +90 342 337 28 70.
- İZMİR / TÜRKİYE**: Şair Eşref Blv. No:28 Sırmaz Boyalı İş Merkezi Kat:8 D:14 Çankaya / Izmir. T: +90 232 441 70 66, F: +90 232 441 91 55.
- SÜPER FİLM AVRUPA**: SUPER FILM EUROPE S.A. 90, ESPLANADE DE LA MOSELLE 6637 WASSERBILLIG - LUXEMBOURG. David Haskins, T: +352 (261) 19 922, F: +352 (261) 19 921.
- İTALYA**: VIALE BATTISTI 139 PESARO 61100 ITALY. Roberto Scrima, T: +39 3289 00 78 75, F: +.

Figure 4-2. Contact Information of Communication Offices

Finally, there is a contact form for complaints, suggestions and information requests on the Project website. All external grievance is received by phone call and contact form that is given on the website.

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned website and at the Project offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 Responding to Stakeholders

Authorities of the Project will give full and timely responses to requests, comments, and questions of local communities in addition to implementing the grievance mechanism procedure in the case of complaints. All requests shall be treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

On the Project website, material providing information about the Project will be available, and stakeholders will be kept posted. When needed, matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities based on impact assessment surveys carried out by the Project. As long as it is appropriate, relevant Project information will be disclosed to the public.

4.4.4 Disclosure Activities

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities should be widely and proactively publicized, especially among Project affected parties, at least 1 (one) week prior to any meeting via website announcements, through mukhtars and posted information banner in mukhtars' offices,
- The location and timing of any meetings will be designed to maximize accessibility to Project affected stakeholders, if needed transportation arrangement will be made by the Project to increase participation in meetings,
- The information presented (via presentations, leaflets, website publications etc.) will be clear and non-technical and will be presented in the local language understood by those in the communities,
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Project will encourage the stakeholders to raise their concerns/complaints and suggestions, and
- Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up on (*see Appendix B*), the person who raised the issue will be informed after the meeting when the issues resolved.

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed and/or requested, separate meetings can be organized at venues frequently visited by women for women-only meetings.

The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP and Grievance Mechanism Procedure) and how they can submit comments, complaints and suggestions.

In case of unexpected pandemic situations like COVID-19, it is required to develop safe and effective stakeholder engagement and grievance management for maintaining a proactive communication process and providing communities with information in a timely manner. The alternative communication methods such as online platforms should be produced and provided by the Project. Based on the principles of stakeholder engagement and grievance mechanism, alternative communication tools and methods can be as follows:

- Digital platforms, social media and messaging platforms,
- Secure grievance portal and announcements through the Project website,

- Online stakeholder engagement workshops by using live web streaming,
- Multiple communication options such as closed captioning for video/conference calls.

5 MANAGEMENT OF GRIEVANCES

5.1 Grievance and Feedback Procedure

Grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (“PAP”).

Grievance procedures will be coordinated through the appointed Social Affairs Staff (“SAS”) with the help of Environment Representative who is the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. The SAS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project SAS, if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of the Project.

The details of the Grievance Mechanism of the Project are given in Grievance Mechanism Procedure (SPR-PRC-SOC-GMP-001).

5.1.1 Collection, Registration and Evaluation of Grievances

Handling of grievances (collection, registration and evaluation) will follow these steps:

- Initiate the grievance procedure by filling up a Complaint Register Form (see Appendix A), mainly by the SAS,
- SAS registers the grievance/comment in the grievance database (see Appendix F);
- The SAS investigates the grievance and makes the first evaluation with the help relevant Departments’ Chief / Managers;
- Final decision is made, and further action is implemented in order to solve the grievance;

- The complainant is notified (if name provided) within 5 working days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 calendar days after the grievance is received);
- The grievance is officially closed after related documentation (*Grievance Closure Form given in Appendix G*) is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated among the related departments; however, handling and tracking should be ensured to be done mutually.

A complaint register form is prepared for official notification of complaints about the Project. “Open door policy” shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

5.1.2 Feedback to the Stakeholders

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the Project builds a more meaningful relationship with stakeholders. This is essential in maintaining a ‘social license to operate’, which refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

The SEP will be reviewed and revised (if needed) annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated, if necessary.

5.2 Grievance Mechanism Communication

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places.

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of the Project). These two mechanisms will be run by the Project SAS, Environment Representative. During the resolution of the internal or external grievances, different departments can be collaborated such as Environment Representative and SAS, etc.

The details on how the grievances are collected and issued are given in Grievance Mechanism Procedure (SPR-PRC-SOC-GMP-001), for more detail please refer to the mentioned procedure.

5.3 Contact Details

The existing contact details of the Project is given below. The contact information regarding the assigned SAS (name and contact number/e-mail address) should be included when this Plan is updated.

Since there is no building belonging to Süper Film in the project area and it is under construction, there is no address information and information of the responsible persons. The contact information of the factory manager is given below.

Table 5-1. Contact Details of the Project

Süper Film Packaging Ind. and Trade Inc.	Contact Person on the Project Site
<p>Website: https://www.superfilm.com/ Project Site Address: To be determined Phone: To be determined</p>	<p>Contact Persons: Social Affairs Staff E-Mail: To be determined Phone: To be determined</p> <p>Environment Representative E-mail: To be determined Phone: To be determined</p> <p>Memik Demir Factory Manager E-mail: memik.demir@superfilm.com Phone: +90 532 208 21 79</p>

5.4 Other Grievance Redress Mechanisms

In addition to Süper Film's grievance mechanism, the residents and/or Project stakeholders can apply to TKYB's existing grievance mechanism and national-level grievance mechanisms such as CİMER and YİMER.

TKYB's Environmental Complaint Mechanism: Any parties directly and/or significantly affected by environmental impacts arising from the TKYB's operational or financial activities can submit a complaint to the TKYB. Complaints are systematically archived and promptly handled. The online form available on the contact webpage of TKYB (can be filled. Also, the phone number and physical address of the general directorate of TKYB is given as:

- www.kalkinma.com.tr
- Online complaint/suggestion form: <https://kalkinma.com.tr/en/contact-us/contact-information>
- Phone number: +90 216 636 87 00

- Fax number: +90 216 636 89 28
- E-mail address: haberlesme@kalkinma.com.tr
- Physical address: Saray mahallesi. Dr. Adnan Büyükdeniz caddesi. No:10 34768 Ümraniye/İstanbul/Türkiye

Presidency's Communication Center: The Presidency's Communication Centre (CİMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CİMER 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.

- www.cimer.gov.tr
- Call Centre: 150
- Phone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates.

Foreigners Communication Center: The Foreigners Communication Center (YİMER) has been providing a centralized complaint system for foreigners. YİMER 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.

- www.yimer.gov.tr
- Call Centre: 157
- Phone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the Republic of Turkey General Directorate of Migration Management.

6 MONITORING

6.1 Review and Revision of this Plan

This SEP will be reviewed annually during operation. During steady state operations, this Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of the Project. Revision of this Plan will be the responsibility of SAS.

If the circumstances change, this Plan may be updated on an “as required” basis.

Any revisions to this Plan will be uploaded to the DCC and the Project website to ensure that all internal and external stakeholders have access to the latest version of this SEP.

6.2 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the stakeholder engagement performance.

Table 6-1. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database
% of visitors that are received Visitor Training/Instructions on general site rules, especially OHS issues	100% of the visitors are received Visitor Training/Instructions	Visitors Registers
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report
% item of Social Responsibility activities that implemented	Target of 80%	Annual Reports

6.3 Key Monitoring Activities

The Project will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health and safety (labor rights) and social performance of the Project mainly through:

- Revision, improvement or extension of the monitoring activities, parameters, locations and frequency; and

- Reviews and revisions of the management plans and procedures.

The Project will monitor the effectiveness of the engagement processes by analyzing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and
- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

The key monitoring activities will focus on ensuring compliance with the requirements set out in this Plan using the key performance indicators.

Table 6-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<p>The Project will review Grievance Log / Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> • number of outstanding complaints and grievances opened in the month, • number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), • number of complaints grievances closed in the month; and • type of grievance. 	Grievance Database	Monthly	Project office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Project office

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Community Engagement Activities	The SAS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Project office
Disclosure Materials and Feedback to Communities	SAS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SAS will monitor feedback to local communities	Community Info System on the Website	Quarterly	Project office
Social Responsibility Program	SAS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement reports.	Annual reports	Annually	Project office

7 TRAININGS

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of this SEP will be followed by the Social Affairs Staff and other personnel and supervisors of the Project Contractors are also involved in or overseeing the stakeholder engagement activities and grievance mechanism procedure.

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e. workers of contractors and/or subcontractors). The trainings will be given in the first “Induction Training” session. All employees of the Project and contractors are required to participate in community relations and human rights training.

7.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Stakeholder Engagement Plan and Grievance Management is also provided to the Social Affairs Staff and other personnel with supervisors of the Project.

8 AUDITING AND REPORTING

8.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Affairs Staff during the operational phase to ensure the assessment of the social responsibility program and overall stakeholder engagement. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

The conformance with this SEP will be subject to periodic assessment as part of the Süper Film audit program and separately by Project Lenders.

8.2 Record Keeping and Reporting

Record keeping will be done by SAS during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations and incidents which will be managed according to the Project procedures.

On monthly basis, an overview of the grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out and engagement activities as completed/ongoing will be recorded periodically. The SAS will evaluate and conclude this overview with project management in the monthly management progress meetings.

APPENDICES

Appendix A: Complaint Register Form

Appendix B: Consultation Form

Appendix C: EIA Exemption Letter of Süper Film

Appendix D: Grievance Database

Appendix E: Grievance Closure Form


Appendix A: Complaint Register Form

Complaint Register Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: _____ What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:		
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem? _____ _____		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details):		


Appendix B: Consultation Form

Consultation Form									
Reference No:									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			Communication Type						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

Appendix C: EIA Exemption Letter of Süper Film



T.C.
KIRKLARELİ VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü



Sayı : 97823509-220.03-E.16071 08.09.2020

Konu : BOPP Film Üretim Tesisi.

SÜPER FİLM AMBALAJ SAN.VE TİC.A.Ş.A
Yeni Mah.OSB D-100 Cad. No:7 Büyükkarıştıran LÜLEBURGAZ / KIRKLARELİ


İlgi : Süper Film Ambalaj San.ve Tic.A.Ş.'nün 27.08.2020 tarihli ve 2020/27 sayılı (10394 kayıt sayılı)yazısı.

Kırklareli İli, Lüleburgaz İlçesi, Büyükkarıştıran/Yeni Mahalle OSB D100 Caddesi, No:7 adresinde (Büyükkarıştıran OSB) Tapununun 419 Ada, 11,12 ve 13 Parselleri üzerinde, **Süper Film Ambalaj Sanayi ve Ticaret A.Ş.** tarafından kurulması planlanan **BOPP Film Üretimi** (164,38 ton/gün, 60.000 ton/yıl BOPP Film Üretimi) faaliyeti, 25/11/2014 tarih ve 29186 sayılı Resmi Gazete'de yayımlanan ÇED Yönetmeliği EK-1 ve EK-2 Listelerine girmediğinden **Kapsam Dışı** olarak değerlendirilmekle birlikte, 02.04.2015 tarih ve 29314 Sayılı Resmi Gazete'de yayımlanan **Atık Yönetim Yönetmeliği** esaslarına göre; faaliyet sonucu oluşan atıkların/ tehlikeli atıkların kayıt altına alınması, ilgili standartlara uygun alanlarda depolanması ve yetkili firmalar vasıtasıyla bertarafının/ geri dönüşümünün/ geri kazanımının sağlanması, bununla birlikte 04.06.2010 tarihli ve 27601 sayılı Resmi Gazetede yayımlanan "**Çevresel Gürültünün Değerlendirilmesi ve Yönetimi Yönetmeliği'nin**" "Açma ve Çalışma Ruhsatı" başlıklı 34 ve 35. Maddede belirtilen hükümler doğrultusunda, ruhsat veren kurum tarafından değerlendirme yapılması, uygun olduğunun kabul edilmesi halinde gerçekleşmesi gerekmektedir.

Bahse konu proje, ÇED Yönetmeliği EK-1, EK-2 listelerinde yer almamakla birlikte, ÇED Yönetmeliği kapsamında verilen ÇED Kapsam Dışı Kararları, bir projede faaliyete başlanması için alınan **nihai bir izin değildir.** Bu nedenle, bir projede faaliyete bulunulabilmesi için ÇED Olumlu Kararı /ÇED Gerekli Değildir Kararı/ÇED Kapsam Dışı Kararı yeterli olmayıp, ilgili idaresinden tesisin belirtilen adrestekurulabileceğine ilişkin imar görüşü/izni, mer'i mevzuat uyarınca kurum ve kuruluşlardan izin, onay, karar ve/veya görüş alınması gereklidir. **ÇED Olumlu/ÇED Gerekli Değildir Kararı/ÇED Kapsam Dışı Kararı verilmiş olursa dahi kurum kuruluşlar, görev, yetki ve sorumlulukları kapsamında, bir projenin gerçekleştirilip gerçekleştirilmemesi hususunda izin verme yetkisine sahiptirler.**

Ayrıca, planlanan yatırım ile ilgili olarak, 5491 sayılı Kanunla Değişik 2872 sayılı Çevre Kanunu ile ilgili Yönetmelik hükümlerine uyulması ve diğer mer'i mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmaması, çevrenin korunması ve geliştirilmesine yönelik tedbirlere riayet edilmesi, herhangi bir değişiklikte Valiliğimize müracaat edilmesi hususunda,


Gereğini rica ederim.

 e-imzalıdır
Mustafa ÜNLÜSOY
Vali a.
Vali Yardımcısı

Not: 5070 sayılı Elektronik İmza Kanunu gereği bu belge elektronik imza ile imzalanmıştır.

Evrak Doğrulama Kodu : QMXDPPFN Evrak Takip Adresi: <https://www.turkiye.gov.tr/cevre-ve-sehircilik-bakanligi>
 Bademlik Mh. Eriklice Cd. No:8 39100/KIRKLARELİ
 Tel:0288.2141068 Fax:0288.2141656

Bilgi için:Alev ERBAY
 Teknisyen



Appendix F: Grievance Database

Grievance Database									
Reporting Period									
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 5 days that the grievance solution process has started.									
** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.									

Appendix G: Grievance Closure Form

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



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