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PROJE MÜŞAVİRLİK MÜHENDİSLİK
TİCARET LTD. ŞTİ.



SANKO TEXTILE INDUSTRY AND TRADE INC. CO.

Project of Constructing a Ring Yarn Production Facility for the Gaziantep (Başpınar)
Branch of the Company and Increasing the Capacity of Open End Yarn Production at its
Facility Located in Adıyaman

Stakeholder Engagement Plan (SEP)

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



**DEVELOPMENT
INVESTMENT
BANK OF TÜRKİYE**

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List of Abbreviations

Aol	Area of Influence
CİMER	The Presidency's Communication Centre
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
GN	Guidance Note
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
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	SANKO Textile Industry and Trade Inc. Co
PAP	Project Affected People
PRC	Procedure
PS	Performance Standard
SAS	Social Affairs Staff
SEP	Stakeholder Engagement Plan
SEA / SH	Sexual Exploitation and Abuse and Sexual Harassment
TEKSİF	Turkish Textile, Knitting, Clothing and Leather Industry Workers Union
The Project	The Project of Constructing a Ring Yarn Production Facility for the Gaziantep (Başpınar) Branch of the Company and Increasing the Capacity of Open End Yarn Production at its Facility Located in Adıyaman
TKYB	Development and Investment Bank of Turkey
YİMER	The Foreigners Communication Center
WB	Word Bank

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for “The Project of Constructing a Ring Yarn Production Facility for the Gaziantep (Başpınar) Branch of the Company and Increasing the Capacity of Open End Yarn Production at its Facility Located in Adıyaman” (“Project”) located in Şehitkamil District of Gaziantep Province and Adıyaman Province to be implemented in parallel to Grievance Mechanism Procedure (“GPM”) prepared for the Project.

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, Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy (“ESP”), IFC Performance Standards and World Bank Environmental and Social Standards (“ESSs”). The reference number of this Plan is SANKO-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

SANKO Textile Industries, established in 1943, is active in cotton and synthetic yarn production, home textiles, weaving and knitting.

The cotton that reach the SANKO Textile facility is spun into yarn with SANKO’s superior quality, modern technology and vast experience of over a century. The production capacity of 500,000 spindles and an extensive product range make SANKO the largest yarn producer in Turkey and one of the biggest of its kind in the world. SANKO Textile invests heavily in ecologically sound products and production techniques, namely, organic and recycled fibers and sustainable production methods.

SANKO Textile has been licensed to process the Supima Cotton USA and Egyptian Cotton by the relevant boards. SANKO Textile had been granted the Belcoro certificate by Schlafhorst as well as the Open End certificate by Control Union. These certifications attest to the production quality regarding organic cotton. Furthermore, all SANKO Textile facilities hold ISO 9001:2000 Quality Management System Certificates.

The main goals of the company are:

- To support the spearhead position of the textile industry within the Turkish economy;
- To be the symbol of quality, stability and trust in cotton textile production in Turkey;
- To support the Turkish economy by increasing production and employment;

- To support the textile exporters of Turkey by producing any yarn or fabric that they may need in international quality standards;
- To produce environmentally friendly yarn and fabric with eco and organic seals.

Sanko Textile has two facilities within the scope of this project. The first of these is SANKO Textile Gaziantep Başpınar Organized Industrial Zone (“OIZ”) Facility. In this facility, yarn production processes are carried out. Within the scope of the project, a new yarn production facility is being built within the body of SANKO Textile Gaziantep Başpınar OIZ. Another facility within the scope of the project is the SANKO Textile Adıyaman Petrol OIZ facility. Yarn production is also carried out the facility. Sanko Textile will increase its capacity in SANKO Textile Adıyaman Petrol OIZ facility within the scope of this project.

A single SEP has been prepared for Gaziantep (Başpınar) and Adıyaman Facilities as per indicated in Environmental and Social Action Plan (“ESAP”) of the Project developed by TKYB.

1.1.1 Project Location and Area of Influence

The locations of the Project Areas are located in the Gaziantep Başpınar Organized Industrial Zone within the administrative borders of Şehitkamil District of Gaziantep Province and in the Adıyaman Petrol Organized Industrial Zone within the administrative borders of Adıyaman Province. There are industrial facilities in the regions that carry out similar activities with the planned Project.

Figure 1-1 indicates the project area in Gaziantep Başpınar OIZ and Figure 1-2 indicates the project area in Adıyaman Petrol OIZ.

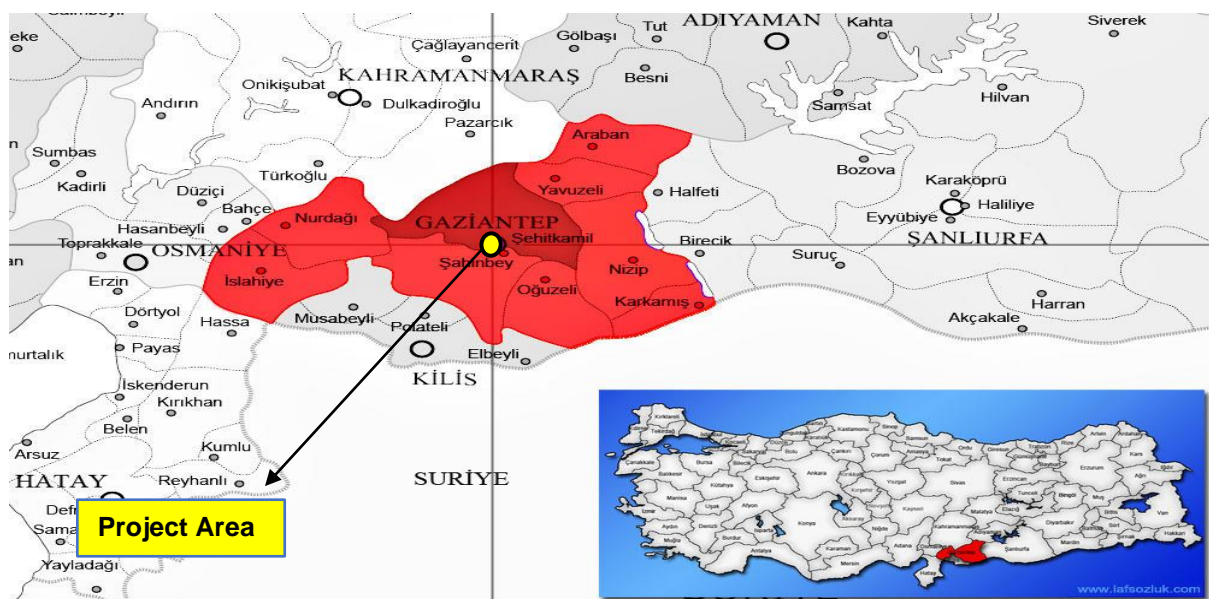


Figure 1-1 Project Area in Gaziantep Başpınar OIZ Facility

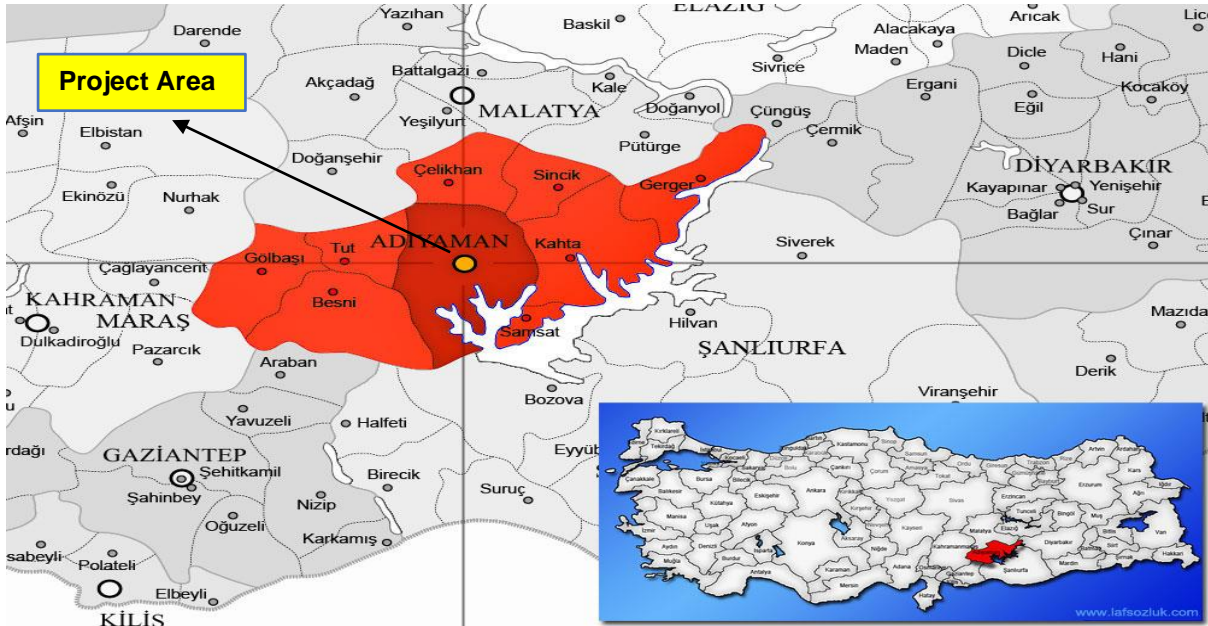


Figure 1-2 Project Area in Adiyaman Petrol OIZ Facility

In the scope of the Project to determine the area of Influences (“Aol”s); access roads will be evaluated by taking into account environmental and social impacts, including existing buildings and infrastructures. The Project area is considered as Aol with a radius of 2 km since similar studies will be carried out with the existing activities within the scope of the Project.

Maps showing the project locations, area of influences and nearest settlements are given in Figure 1-3 and Figure 1-4 for both plant.

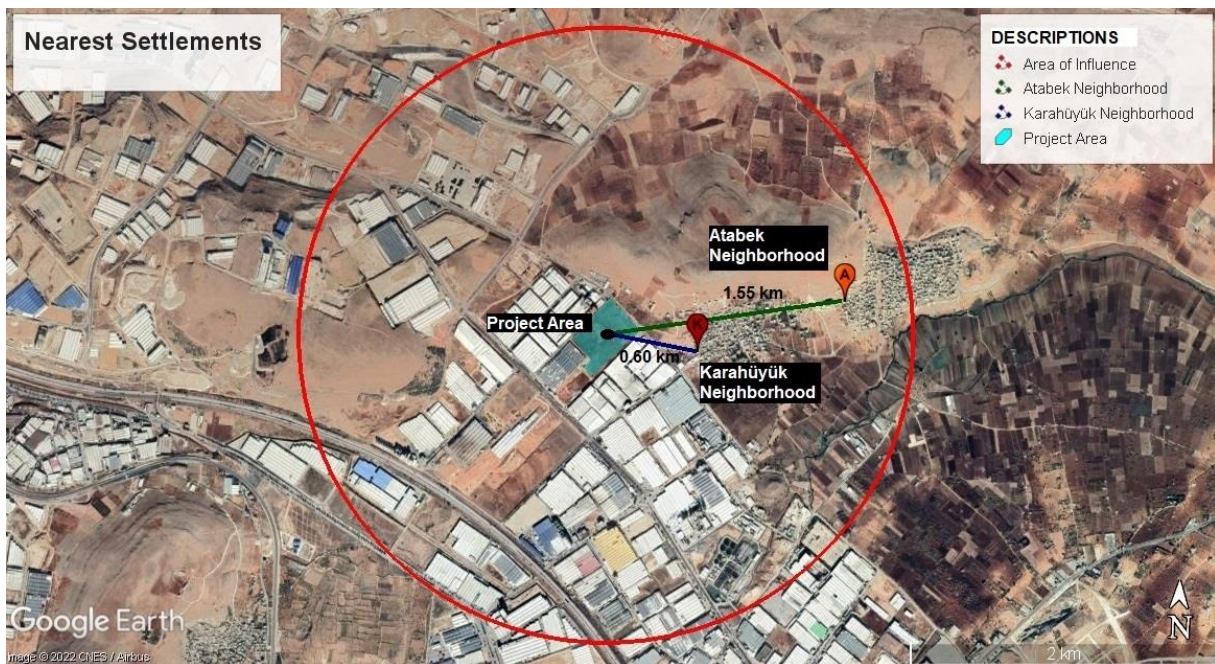


Figure 1-3 Nearest Settlements to the Project Area in Gaziantep Başpınar OIZ



Figure 1-4 Nearest Settlements to the Project Area in Adiyaman Petrol OIZ

The closest settlement populations for both project areas are given in Table 1-1 and Table 1-2. The distances of the project area to the nearest settlements were determined according to the distances of the nearest residences to the project area.

Table 1-1. Closest Settlements to Project Area in Gaziantep Başpınar OIZ

Settlement	Distance to the Project Area (km)	Direction	Population		
			Total	Female	Male
Atabek Neighborhood	~1.55	Northeast	1.926	939	987
Karahüyük Neighborhood	~0.6	Southeast	1.416	707	709

Table 1-2. Closest Settlements to Project Area in Adiyaman Petrol OIZ

Settlement	Distance to the Project Area (km)	Direction	Population		
			Total	Female	Male
Türkiye Petrolleri Neighborhood	~1.37	Northeast	1,308	666	642
Ataköy Neighborhood	~1.40	Southwest	106	49	57

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. Date 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 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:

- Environmental and Social Management Plan (SANKO-PLN-HSSE-ESMP-001),
- Emergency Response Plan (SANKO-PLN-HSE-ERP-003),
- Grievance Mechanism Procedure (SANKO-PRC-SOC-GMP-001),
- Air Quality Management Plan (SANKO-PLN-ENV-AQMP-001),
- Waste Management Plan (SANKO-PLN-HSE-WMP-002),
- Occupational Health and Safety Management Plan (SANKO-PLN-HSE-OHSMP-001),
- Human Resources Policy (SANKO-PLC-SOC-HRP-001), and
- Carbon Footprint Report.

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
General Manager	<ul style="list-style-type: none"> • Determining the policies and targets regarding the social communication and stakeholder engagement, • Approval of this SEP, • Ensures this SEP will be implemented during the lifetime of the Project, • Appoints the Deputy General Manager, • Evaluates the reports provided by Deputy General Manager and ensures necessary actions were taken, • Approving the social budget of the Project determined and submitted by Human Resources Manager / Social Affairs Staff (SAS).
Deputy General Manager	<ul style="list-style-type: none"> • Ensuring this plan is implemented properly during the lifetime of the Project, • Ensures the Teams under the SAS, HR Manager and Social Compliance / Communication Team are aware of his / her responsibilities, • Provides necessary resources for proper implementation of this SEP and GRM, • Coordinates with parties for proper implementation of this SEP, • Providing necessary resources for the implementation of the stakeholder engagement plan, • Reports to the General Manager about performance of the system, • Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked,

Roles	Responsibilities
	<ul style="list-style-type: none"> • 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) / Human Resources Manager.
<p>Social Affairs Staff (“SAS”) / Human Resources (“HR”) Manager /</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, • Coordinating the relevant parties for the proper implementation of this Plan, • Determining the social budget of the Project and reporting it to the Deputy General Manager, • Reporting to the Deputy General Manager about the system performance, • Ensuring national and international legislation/guidelines which are applicable to the Project activities are identified and tracked, • Recording all formal and informal engagement activities with local communities in Document Control Centre (“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 and 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.) (see <i>Appendix F: Grievance Database</i>), • 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, • Filling out the “Complaint Register Form” (<i>Appendix A: Complaint Register Form</i>), keeping the grievance records in “Grievance Database” (<i>Appendix F: Grievance Database</i>) and monitoring the grievances through the database, and filling out “Consultation Form” (<i>Appendix B: Consultation Form</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 working days that the grievance solution process has started and after the grievance closed).

Roles	Responsibilities
Social Compliance / Communication Team	<ul style="list-style-type: none"> • They are the teams working under the Project's SAS / HR Manager, • Performing internal and external communication, • Having responsibility for the implementation of this SEP by fulfilling the Project requirements together with SAS / HR Manager, • Determining necessary resources for proper implementation of this SEP and reporting them to the SAS / HR Manager.
Environmental Management Representative	<ul style="list-style-type: none"> • Reporting environmental risks to the Deputy General Manager, • Planning and implementing environmental trainings in accordance with the national and international standards, • Evaluating the risks and preparing precautionary proposals by conducting investigations of the damages that the emergencies in the surrounding area can cause to the environment, to the Project and employees during and after the emergency, • Ensuring that measures are taken according to the risks that arise during and after the emergency and coordinating the relevant activities, • Performing routine environmental inspections and reporting the results of the inspections to the Deputy General Manager, • Control of the environmental performances and records of the Contractors, preparing an annual report on environmental status of the Project.
Health and Safety Representative	<ul style="list-style-type: none"> • Determining the Occupational Health and Safety ("OHS") 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 and auditing the performance of the Contractors on those requirements, • Supporting SAS / HR Manager to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding OHS issues.
Health, Safety and Environment (HSE) Staff	<ul style="list-style-type: none"> • Determining the OHS and environmental 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 and environmental requirements as per the Project Standards and auditing the performance of the Contractors on those requirements, • Supporting SAS / HR Manager to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding health and safety issues.
Contractor Representatives / Project Responsible	<ul style="list-style-type: none"> • Ensuring that all requirements in this SEP are complied with.
Contractors / Subcontractors /	<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.

Roles	Responsibilities
Suppliers & Employees	

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,
- TKYB Environmental and Social Policy,
- applicable international standards and guidelines,
- World Bank (“WB”) Environmental and Social Standards (“ESS”s).
- International Finance Corporation (“IFC”) Performance Standards (“PS”s)
- 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

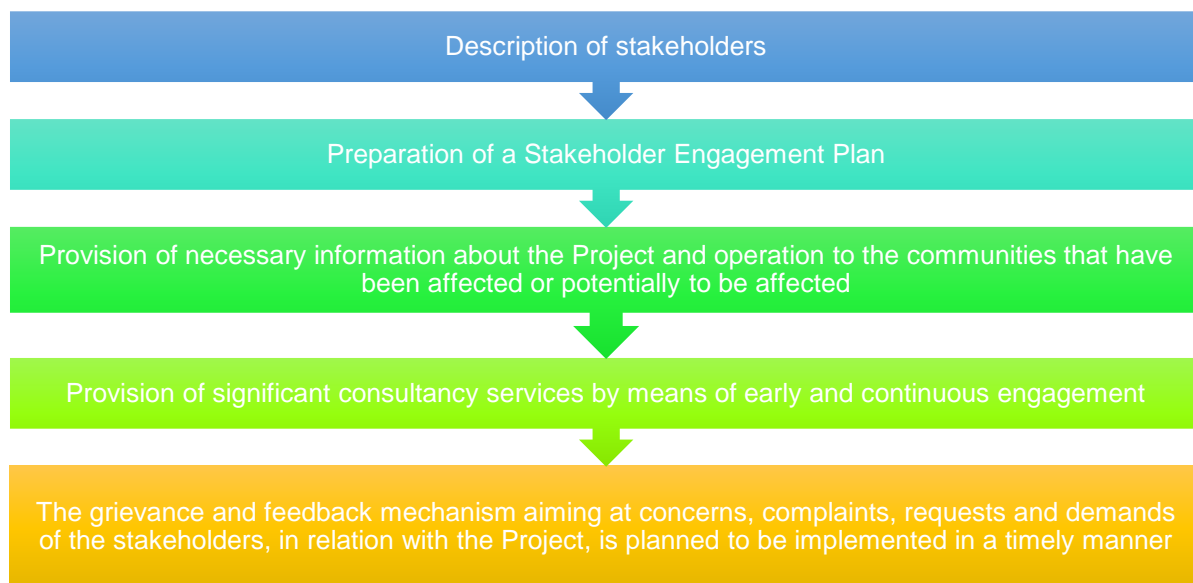


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

International standards to be observed by the Project are the IFC Performance Standards and WB ESSs. 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

3.3.2 Word Bank Requirements

The objectives of ESS 10 Stakeholder Engagement and Information Disclosure are set by WB as follows:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate 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 project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

Stakeholder engagement is the continuing and iterative process by which the Project identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the project design, implementation, and operation.

WB ESS10 requires the Project to engage in meaningful consultations with all stakeholders. The Projects should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

Moreover, The Project should maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

Within the scope of the Project, there exists an Apprenticeship Training Center which the apprentices are trained and working within the framework of legal obligations. The details are

given within this plan. At this point, WB ESS2: Labor and Working Conditions emphasizes on the child labor and minimum age as:

“A child under the minimum age established in accordance with this paragraph, will not be employed or engaged in connection with the project. The labor management procedures will specify the minimum age for employment or engagement in connection with the project, which will be the age of 14 unless national law specifies a higher age.”

Documentation and verification of age are important steps in preventing employment and/or engagement of child labor. The Project should include the following, which are undertaken before the employment or engagement of a child labor and kept on file:

- Obtaining written confirmation from the applicant of their age.
- Where there is any reasonable doubt as the age of the applicant, requesting and reviewing available documents to verify age (such as birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If a child under the minimum age is discovered working on the project, measures will be taken to terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child. Possible measures will be outlined in the labor management procedures.

A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous, interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development. Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work: (a) with exposure to physical, psychological, or sexual abuse; (b) underground, underwater, or working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise, or vibration damaging to health; or (e) under difficult conditions such as working for long hours, during the night, or in confinement on the premises of the employer.

A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under following specific conditions:

- An appropriate risk assessment is conducted prior to the work commencing and

- The Project conducts regular monitoring of health, working conditions, hours of work, and the other requirements of the ESS2.

To support monitoring, ESS2 Guidance Note recommends creating and maintaining a separate record of all project workers over the minimum age and under 18. This record should include the details of their enrolment in school or vocational training programs.

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

SANKO Textile has a total of 485 employees in the project construction site in Gaziantep Başpınar OIZ. 350 of these employees are subcontractors. SANKO Group has its own subcontractor company, POLİGON, as well as subcontractors. These are: Enbia Group Construction Company, MR Engineering Company, Boy Panel Building Systems Engineering Company and ARY Construction Company. The vast majority of the employees interviewed at the construction site are subcontractors of these subcontractors. For this reason, working conditions and employee rights may vary.

A total of 37 white-collar employees, 25 male and 12 female, at SANKO Textile Adıyaman Petrol OIZ Facility; 1003 blue-collar employees, 755 of whom are male and 248 are female, were employed. In addition, 32 disabled individuals work at SANKO Textile Adıyaman Petrol OIZ facility. On the other hand, 12 engineering students are offered internship opportunities.

The project has been evaluated according to the Annex-1 and Annex-2 lists within the scope of the national EIA legislation. As a result of the evaluation, the project was found out of scope from both lists and Appendix C: Exemption Letter of SANKO Textile



T.C.
GAZİANTEP VALİLİĞİ
Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğü



Sayı : E-46818599-220.03-2647535

Konu : Muafiyet

SANKO TEKSTİL İŞLETMELERİ SAN. VE TİC. A.Ş.
Başpınar (Organize) OSB Mah. OSB 4. Bölge Şehitkamil GAZİANTEP

İlgi : 24.12.2021 tarih ve 2347110 sayılı yazı.

Gaziantep İli, Şehitkamil İlçesi, Başpınar (Organize) OSB Mah. OSB 4. Bölge adresinde, tapunun Ada No: 124, Parsel No: 4'deki taşınmaz üzerinde Sanko Tekstil İşletmeleri San. ve Tic. A.Ş. tarafından yapılması planlanan "İplik Üretim Tesisi" (36.000 ton/yıl) projesi, 25/11/2014 tarih ve 29186 sayılı Resmî Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliği Listelerinde yer almadığından kapsam dışı olarak değerlendirilmiştir.

Ancak, planlanan yatırım ile ilgili olarak, 5491 sayılı kanunla değişik 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer mer'î mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi gerekmektedir.

Bilgi ve gereğini rica ederim.

Enver KURTOĞLU
Çevre, Şehircilik ve İklim Değişikliği İl Müdürü V.

Bu belge, güvenli elektronik imza ile imzalanmıştır.
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Tel: 0 342 321 39 03 - Faks: 0 342 321 39 00 SOKUCU
e-posta: gaziantep@csb.gov.tr İnternet Adresi: www.csb.gov.tr/iller/gaziantep Elektrik-Elektronik Mühendisi



was taken from Gaziantep Provincial Directorate of Environment, Urbanism and Climate and Adıyaman Provincial Directorate of Environment, Urbanism and Climate.

In addition, due to the capacity increase of the facility in 2016, it was exempted from the EIA requirements with the "Out of Scope" letters, which were evaluated by the same regulation. (see *Appendix C: Exemption Letter of SANKO Textile*)



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Sayı : E-46818599-220.03-2647535

Konu : Muafiyet

SANKO TEKSTİL İŞLETMELERİ SAN. VE TİC. A.Ş.
Başpınar (Organize) OSB Mah. OSB 4. Bölge Şehitkamil GAZİANTEP

İlgi : 24.12.2021 tarih ve 2347110 sayılı yazı.

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Bilgi ve gereğini rica ederim.

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e-posta: gaziantep@csb.gov.tr İnternet Adresi: www.csb.gov.tr/iller/gaziantep Elektrik-Elektronik Mühendisi



). For this reason, stakeholder engagement meetings have not been held before.

On the other hand, on 01.09.2022, SANKO Textile's facility located in Adiyaman Petrol OIZ was subject to inspection by the Adiyaman Provincial Directorate of Environment, Urbanism and Climate due to its capacity increase. See Appendix D: EIA Audit Report of SANKO Textile for the EIA Audit Report.

The e-mail address and contact number of the customer services are available on the SANKO Textile website (<https://www.sankotextile.com/contact/>).

Within the scope of Environmental and Social studies carried out by MGS, the project areas of SANKO Textile located in Gaziantep Başpınar OIZ and in Adiyaman Petrol OIZ were visited on 12-13 December 2022.

MGS conducted interviews with the employees of SANKO Textile's project at the construction sites located in Gaziantep Başpınar OIZ and the facility located in Adiyaman Petrol OIZ, and the mukhtars of the settlements close to both project areas, on 12-13 December 2022. In the scope of the subject studies The identification of stakeholders and stakeholder participation were targeted to evaluate their complaints and demands.

In the scope of the Project; interviews were held with project employees, a labor union representative and Gaziantep Başpınar OIZ Directorate on the facility located at Gaziantep Başpınar OIZ; which is under construction. Additionally, interviews with project employees, a labor union representative, located, Adiyaman Petrol OIZ Directorate and Gaziantep Chamber of Industry were conducted to obtain information about the company's activities and its relations with its corporate stakeholders.

In these interviews, current communication efficiency with stakeholders is questioned and current suggestions, concerns and expectations are recorded. There are positive effects expected from the Project.

In general, common opinions are the same. That is; SANKO Textile provides employment to many people, including local people. If the labor force needs are shared with the mukhtars, it will be possible to forward the job advertisement to the appropriate candidates. Increased communication with local stakeholders is expected to have a positive impact on both sides.

A summary of this study is provided in the Table 4-1, and consultation photos are presented in Appendix E: Photos of Consultation Activities held by MGS.

Table 4-1. Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Community	Mukhtar of Atabek Neighborhood Şehitkamil / Gaziantep	04.01.2023 Interviewed by phone	<ul style="list-style-type: none"> • It was stated by the mukhtar that the population of the neighborhood is approximately 1,900. • The population of the neighborhood does not show a significant change according to the seasons. • The population of the neighborhood did not show a significant change from year to year. • There are no refugees living in the neighborhood. • The majority of the neighborhood population consists of residents between the ages of 40-64. Then comes the population over 65 years old • There is only one secondary school within the boundaries of the neighborhood. There are not children living in the neighborhood who do not go to school. • The closest primary and high school to the neighborhood is in the center of Şehitkamil district, which is 5 km away. • It was stated that most of the population of the neighborhood is secondary school graduate. • The main livelihood of the residents of the neighborhood is agricultural production. • Many retirees live in the neighborhood. • Approximately 50 unemployed individuals reside in the neighborhood. • The average income in the neighborhood is the minimum wage. • There are health centers in the neighborhood. • There are 25 physically disabled individuals and 4 mentally disabled individuals living in the neighborhood. On the other hand, there are approximately 25 female-headed households. • It was stated that the most important problem of the neighborhood is poverty. It was stated that 40 households needed food aid on a regular basis. • It was requested to provide food aid to the poor households residing in the neighborhood at regular intervals. • The project does not have a negative economic and social impact on the neighborhood. • It was stated that there are no residents working in SANKO Tekstil in the neighborhood. • It was requested from the SANKO Textile to provide employment from the local people. • It was stated that although the company is known by the local people, the knowledge of both the headman and the local people about its activities is limited. • No meeting / interview was held with Muhtar by SANKO Textile in the scope of the Project. • No complaints were recorded.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
	<p>Mukhtar of Karahüyük Neighborhood</p> <p>Şehitkamil / Gaziantep</p>	<p>04.01.2023</p> <p>Interviewed by phone</p>	<ul style="list-style-type: none"> • It was stated by the mukhtar that the population of the neighborhood is approximately 2,000. • The population of the neighborhood does not show a significant change according to the seasons. • The population of the neighborhood did not show a significant change from year to year. • There are no refugees living in the neighborhood. • The majority of the neighborhood population consists of residents the population over 65 years old. Then comes the between ages of 40-64 • There are one secondary school and one primary school within the boundaries of the neighborhood. There are not children living in the neighborhood who do not go to school. • The closest high school to the neighborhood is in the center of Şehitkamil district, which is 5 km away. • It was stated that most of the population of the neighborhood is primary school graduate. • The basic livelihood of the residents of the neighborhood is factory labor. There is no agricultural production in the neighborhood. • Many retirees live in the neighborhood. • Approximately 15 unemployed individuals reside in the neighborhood. • The average income in the neighborhood is the minimum wage. • There are health centers in the neighborhood. • There are 15 physically disabled individuals and 3 mentally disabled individuals living in the neighborhood. On the other hand, there are approximately 10 female-headed households. • It was stated that the most important problem of the neighborhood is poverty. It was stated that 100 households needed food aid on a regular basis. • It was requested to provide food aid to the poor households residing in the neighborhood at regular intervals. • The project does not have a negative economic and social impact on the neighborhood. • It was stated that there are no residents working in SANKO Textile in the neighborhood. • The information of both the mukhtar and the local people about the activities of the company or the project is limited. • SANKO Textile did not carry out any information activities in the neighborhood. • Mukhtar stated that he wanted to meet with SANKO Textile managers, but had difficulties in getting an appointment. • No complaints were recorded.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Community	Mukhtar of Türkiye Petrolleri Neighborhood Adiyaman Province	13.12.2022 Mukhtar's Office	<ul style="list-style-type: none"> • It was stated by the mukhtar that the population of the neighborhood is approximately 3.000. • The population of the neighborhood does not show a significant change according to the seasons. • The population of the neighborhood has increased from year to year. According to the mukhtar, the reason for this increase is newly built housing estates. • The majority of the neighborhood population consists of residents between the ages of 6-18. Then comes the population between the ages of 0-5. • There is only one primary school within the boundaries of the neighborhood. The closest secondary school and high school to the neighborhood are located in the Yeni Sanayi neighborhood, which is 5 km away from the neighborhood. • There is no child living in the neighborhood who does not go to school. • It was stated that most of the population of the neighborhood is secondary school graduate. • There are no residents who have never been to school in the neighborhood. • The main livelihood of the residents of the neighborhood is agriculture. Tobacco, wheat and barley cultivation is common. • The mukhtar stated that 80% of the residents of the neighborhood earn their living from agriculture, and the remaining 20% from a pension. • There are about 100 unemployed people residing in the neighborhood. Muhtar requests SANKO Textile to provide employment opportunities to local people. • The average income level is the minimum wage. • There are health centers in the neighborhood. • The neighborhood mostly uses natural gas for its heating needs. • There are 5 physically disabled individuals and 5 mentally disabled individuals living in the neighborhood. On the other hand, there are approximately 10 female-headed households. • It was stated that the most important problem of the neighborhood is poverty. It was requested from the company to support households with poverty problems. • The company's activities are known and supported by local people. • SANKO Textile provided employment for 6 people from the neighborhood. • The mukhtar requests the company to provide financial support for the construction of a condolence house and a football field in the neighborhood. • Face-to-face meetings are preferred by the mukhtar. • The project does not have a negative economic and social impact on the neighborhood.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Community	Mukhtar of Ataköy Neighborhood Adiyaman Province	13.12.2022 Mukhtar's Office	<ul style="list-style-type: none"> • It was stated by the mukhtar that the population of the neighborhood is approximately 150 • The population of the neighborhood increases by 50 people in the summer season. • There has been no increase or decrease in the population of the neighborhood over the years. • The majority of the neighborhood population consists of individuals over the age of 65. • There are no schools within the boundaries of the neighborhood. The nearest primary, secondary and high school is located in the city center of Adiyaman, 7 km from the neighborhood. • There is no child living in the neighborhood who does not go to school. • It was stated that most of the population of the neighborhood is primary school graduate. • There are no residents who have never been to school in the neighborhood. • The main livelihood of the residents of the neighborhood is agriculture. Tobacco, wheat and barley cultivation is common. • Mukhtar stated that the majority of the residents of the neighborhood earn their living from agriculture and pensions, and some of them from textile work. In addition, cattle breeding is carried out in three households. A total of 20 cattle are raised in the neighborhood. • The number of unemployed in the neighborhood is low. • The average income level is the minimum wage. • There are no health centers in the neighborhood. • The neighborhood mostly uses coal stoves for heating needs. • There are 4 physically disabled individuals and 2 mentally disabled individuals living in the neighborhood. On the other hand, there are approximately 1 female-headed households. • It was stated that the most important problem of the neighborhood is the insufficiency of mains water. • The company was asked to support households with poverty problems. • Local people's knowledge of the company's activities is limited. • SANKO Textile provided employment to 1 person from the neighborhood. • The mukhtar requests the company to provide financial support for the condolence house and the improvement of the stream that runs through the neighborhood. • Face-to-face meetings are preferred by the mukhtar. • The project does not have a negative economic and social impact on the neighborhood.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Institution	Adıyaman Organized Industrial Zone (OIZ) Director	13.12.2022 Adıyaman OIZ Directorate	<ul style="list-style-type: none"> • SANKO Textile is in regular contact with Adıyaman OIZ via telephone or face-to-face meetings. On the other hand, Adıyaman OIZ organizes field visits to the company periodically. • Communication and cooperation between SANKO Textile and Adıyaman OIZ are effective. • To date, there has been no complaint or negative feedback within the scope of Project activities. • It is thought that the project will take place in future projects in terms of social responsibility. • The project has positive effects on the region and Türkiye in terms of employment and social assistance. • Adıyaman OIZ is active in SANKO Textile's environmental and social audit processes. • It was emphasized that they are pleased with SANKO Textile because it offers employment opportunities to the local people. It was stated that approximately 1200 employees were employed in recent years. • SANKO Textile was recommended to organize social responsibility projects on facilitating access to food.
Local Institution	Gaziantep Başpınar Organized Industrial Zone Facility Manager	12.12.2022 Gaziantep Başpınar OIZ Directorate	<ul style="list-style-type: none"> • SANKO Textile is in regular contact with Gaziantep Başpınar OIZ via telephone, e-mail or face-to-face meetings. • It was mentioned that there was a cooperation with SANKO Textile in the project carried out on the recycling of textile water. • Communication and cooperation between SANKO Textile and Gaziantep Başpınar OIZ are effective. • Gaziantep Başpınar OIZ has information about all the production processes of SANKO Textile. It was stated that positive feedback was received on requests and suggestions. • To date, there has been no complaint or negative feedback within the scope of Project activities. • It is thought that the project will take place in future projects in terms of social responsibility. • The project has positive effects on the region and Türkiye in terms of employment and social assistance. • It was emphasized that they are pleased with SANKO Textile because it offers employment opportunities to the local people. • It was suggested to organize environmental awareness trainings.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Local Institution	Gaziantep Chamber of Industry A Manager	12.12.2022 Gaziantep Chamber of Industry Directorate	<ul style="list-style-type: none"> • It was stated that the activities of SANKO Textile are shared with the public in a transparent manner, and that all institutions and organizations in the region can easily communicate with SANKO Textile. • It was stated that joint projects were carried out on the improvement of the quality of vocational education. • It was said that SANKO Textile could be contacted through its managers, and that there was an effective communication network between them and SANKO Textile. • SANKO Textile carries out projects that give importance to the training of trainers. Trainings on this subject are organized in cooperation. • It was emphasized that SANKO Textile contributed to the regional development to a great extent. • SANKO Textile was advised to pay more attention to the promotion of their donation and training projects.
Employee of the Project	Occupational Health and Safety Specialist	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • She has been working as an Occupational Health and Safety Specialist at SANKO Textile for 8 months. • It works between 08:30-18:30 on weekdays. It does not work on Saturday and Sunday. • While the lunch break is one hour, break times are flexible. • She comes to work with the service vehicle and the service stop is close to her house. • Since she has not worked for more than 1 year, she is not entitled to annual leave yet. • She has only received ISO-45001 training since she started working. • She receives her salary regularly and finds it sufficient. • As a fringe benefit, she receives bonus checks twice a year and clothing aid once a year during Ramadan Feast. • Notifies the manager verbally when she has any complaints or suggestions. Practical and positive feedback is received. • She finds the OHS measures sufficient.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Employee of the Project	TEKSİF Labor Union Representative	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • He has been working as Labor Union Representative at SANKO Textile. • He is also the SANKO Textile representative of the “Turkish Textile, Knitting, Clothing and Leather Industry Workers Union” (TEKSİF). • While the lunch break is one hour, there are two 30-minute coffee breaks. He finds the break times sufficient. There is a social area where he can spend his break times productively. • He comes to work in a service vehicle and the service stop is close to his home. • It receives training on OHS, fire and earthquake precautions approximately every year. • He receives his salary regularly and finds it sufficient. • As a fringe benefit, he receives bonus four times a year, and clothing aid every year during Ramadan Feast. On the other hand, SANKO Textile gives a monthly scholarship to his son, who is studying at university. • He verbally reports his complaints to the HR manager. Practical and positive feedback is received. • Finds OHS measures sufficient. • He stated that employees sometimes have problems in obtaining permission, but they can easily solve these problems with SANKO Textile managers. • It was stated that the employees sometimes complain about the food.
Employee of the Project	Occupational Physician	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • He has been working as Occupational Physician at SANKO Textile for 10 days. • It works between 09:00-17:00 on weekdays. • Provides transportation with its own vehicle. • He stated that he and the employees did not experience any discomfort due to the meal. • He receives his salary regularly and finds it sufficient. • When there is a problem or complaint, he prefers to report face to face to the administrative units. • It considers the OHS measures as sufficient within the existing possibilities. • It was stated that complaints such as upper respiratory tract infections, colds and headaches were encountered most frequently in the project employees. • Periodic inspection is applied to all employees every 3 years. • It was stated that although there were accidents at the facility, almost all of them were caused by the negligence of the employees. • He stated that OHS and disease prevention training is given as a toolbox to newly recruited employees.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
			<ul style="list-style-type: none"> On the other hand, trainings are organized every 6 months on topics such as Covid-19 measures, hygiene, first aid, occupational diseases and addictions.
Employee of the Project	Technician	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> He has been working as a Technician at SANKO Textile for 8 years. He works between 08:00-17:00 on weekdays. He also works until 12:00 on Saturdays. He comes to work by company's service vehicle and the service stop is close to his house. While the lunch break is one hour, there are two 15-minute coffee breaks. Break times are flexible. He can use his annual leave whenever he wants. He receives training on OHS and first aid every 3 months. He finds his salary sufficient and receives it regularly. In addition to his salary, he receives a holiday bonus twice a year and a food parcel at regular intervals. He stated that vocational school graduates are paid additional wages and that he receives an additional bonus to his salary every month because he is a vocational school graduate. Notifies the manager verbally when he has a complaint. Occupational health and safety measures are adequate and controlled.
Employee of the Project	Site Manager	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> He has been working as a site manager for the project for 4 months. He is an employee of MR Engineering Company. He works between 08:00-17:00 on weekdays. He lives on the construction site of the project. He stated that the conditions of the construction site are suitable and hygienic. Break times are flexible. He can use his annual leave whenever he wants. Apart from the annual leave, he can take up to one week of leave when he needs it. He receives training on a different subject every week. He finds his salary sufficient and receives it regularly. In addition to his salary, he receives a holiday bonus twice a year and a food parcel at regular intervals. Notifies the manager verbally when he has a complaint. Gets practical feedback. He finds the occupational health and safety measures sufficient.
Employee of the Project	Civil Engineer	12.12.2022	<ul style="list-style-type: none"> He has been working on the project as a civil engineer for 3 months. He is an employee of ARY Construction company. He works between 08:00-17:00 on weekdays. He also works until 12:00 on Saturdays.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
		Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • He comes to work with the vehicle allocated to him by the company. • While the lunch break is 1 hour, there are two 15-minute coffee breaks. Break times are flexible. • He can use his annual leave whenever he wants. • Every 2 months, he receives training on different subjects, especially OHS, fire and first aid. • He finds his salary sufficient and receives it regularly. • He receives a bonus every 3 months in addition to his salary. • Notifies the manager verbally when he has a complaint. It can get easy feedback. • Occupational health and safety measures are adequate and controlled.
Employee of the Project	Technician	12.12.2022 Gaziantep Başpınar OIZ SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • The employee has been working as a technician on the project for 7 months. He is an employee of Enbiya Construction Company. • She works between 09:00-18:00 on weekdays. • She comes to the workplace with the company's service vehicle and stated that the service station is not close enough to her house. • Uses the cafeteria of the construction site for lunches. She stated that she did not experience any discomfort. • She can use her annual leave whenever she wants. • It receives training on working at height and OHS once a year. • She receives her salary on time and pays it regularly. Although the employee states that she is satisfied with her salary for now, she thinks that after a few months it may be insufficient. • Receives bonuses twice a year in addition to salary. • In general, she prefers to verbally report her complaints to a senior manager whenever she encounters a problem. She stated that she received fast and positive feedback. • Finds occupational health and safety measures sufficient. • She stated that the break times are sufficient. • There is no social area where she can spend her breaks productively.
Employee of the Project	Staff	12.12.2022 Gaziantep Başpınar OIZ	<ul style="list-style-type: none"> • He has been working as a staff at SANKO Textile for 1 years. • He works between 08:00-17:00 on weekdays. He also works until 12:00 on Saturdays. • He comes to work by company's service vehicle and the service stop is close to his house. • While the lunch break is one hour, there are two 15-minute coffee breaks. Break times are flexible. • He can use his annual leave whenever he wants.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
		SANKO Textile Project Construction Site	<ul style="list-style-type: none"> • He receives training on OHS monthly. • He finds his salary sufficient and receives it regularly. • In addition to his salary, he receives a holiday bonus twice a year and a food parcel at regular intervals. • Notifies the manager verbally when he has a complaint.
Employee of the Project	Fire Fighter	12.12.2022 SANKO Textile Adiyaman Petrol OIZ Facility	<ul style="list-style-type: none"> • He has been working as a firefighter at SANKO Textile for 8 years. • It works in shifts. Shift hours are 07:00-15:00, 15:00-23:00, 23:00-07:00. It changes with another shift every week. Only Sunday is a holiday. • While the lunch break is one hour, there are two 30-minute coffee breaks. Break times are flexible. • He finds lunch satisfactory. • He comes to work with his own vehicle. No fuel costs are paid by the company. • He can take annual leave when necessary. • He receives training on chemicals, first aid, fire safety and OHS every 6 months. • His salary is paid regularly. • Receives year-end performance bonus and food parcels at regular intervals as fringe benefits. • Notifies the company managers verbally when there is a complaint. • He finds the OHS measures sufficient.
Employee of the Project	Cleaning Staff	12.12.2022 SANKO Textile Adiyaman Petrol OIZ Facility	<ul style="list-style-type: none"> • He has been working as a cleaning staff at SANKO Textile for 15 years. • It works between 08:30-18:30 on weekdays. • He comes to work by bus and the service stop is close to his house. • While the lunch break is one hour, there are two 30-minute coffee breaks. Break times are flexible. • He can use his annual leave whenever he wants. • Gets OHS training every 6 months. • He finds his salary sufficient and receives it regularly. • In addition to his salary, he receives a holiday bonus twice a year and a food parcel at regular intervals. • Notifies the manager verbally when he has a complaint. • Occupational health and safety measures are adequate and controlled.

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation
Employee of the Project	Machine Operator	12.12.2022 SANKO Textile Adiyaman Petrol OIZ Facility	<ul style="list-style-type: none"> • The employee has been working as a machine operator at SANKO Textile for 12 years. • She works in shifts. Shift hours are 07:00-15:00, 15:00-23:00, 23:00-07:00. It alternates with another shift each week. It works 6 days a week. Weekly days off correspond to a different day each week. • She comes to her workplace with the company's shuttle vehicle and states that the service stop is not close enough to her house. • She eats her meals in the cafeteria of the facility. • She expressed his discomfort with the fact that the meal time was 22:00 on the days she worked the night shift. • She can use her annual leave whenever he wants. • She receives OHS and first aid training once every 6 months. • Her salary is paid regularly. Although the employee states that he is satisfied with her salary for now, she thinks that it may be insufficient after a few months. • She receives bonuses in addition to her salary twice a year. • Generally, when faced with a problem, she prefers to verbally report their complaints to a senior manager. She stated that she received fast and positive feedback. • Finds occupational health and safety measures sufficient. • She stated that the break times are not enough. • There is no social area where she can spend her breaks productively.
Employee of the Project	Machine Operator	12.12.2022 SANKO Textile Adiyaman Petrol OIZ Facility	<ul style="list-style-type: none"> • He has been working as a Machine Operator at SANKO Textile for 13 years. He works in shifts. Shift hours are 07:00-15:00, 15:00-23:00, 23:00-07:00. It changes with another shift every week. It works 6 days a week. Weekly days off correspond to a different day each week. • An employee is a speech handicapped individual. • He comes to work with the company shuttle and the service stop is close to his house. • He cannot attend trainings due to his disability. Sign language support should be provided. • He receives his salary regularly, but finds it insufficient. • Receives bonus and food parcels twice a year apart from salary. • When he has a complaint, he can solve it by notifying his manager. • His arm and hand were previously damaged as a result of a work accident.

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 (“NGO”s) 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
External Stakeholders		
Local Communities (Nearby Settlements)		
Mukhtars and residents of the following neighborhoods		
➤ Sam Neighborhood (Şehitkamil / Gaziantep)		
➤ Aktoprak Neighborhood (Şehitkamil / Gaziantep)		
➤ Karahüyük Neighborhood (Şehitkamil / Gaziantep)		
➤ Dülük Neighborhood (Şehitkamil / Gaziantep)	✓	✓
➤ Ataköy Neighborhood (Central District / Adıyaman)		
➤ Karapınar Neighborhood (Central District / Adıyaman)		
➤ Yeni Sanayi Neighborhood (Central District / Adıyaman)		
➤ Türkiye Petrolleri Neighborhood (Central District / Adıyaman)		
Government		
➤ Gaziantep Provincial Directorate of Environment, Urbanization and Climate Change		
➤ Gaziantep Provincial Directorate of Industry and Technology Provincial		
➤ Governorship of Gaziantep		
➤ Sub-Governorship of Şehitkamil District	x	✓
➤ Adıyaman Provincial Directorate of Environment, Urbanization and Climate Change		
➤ Adıyaman Provincial Directorate of Industry and Technology Provincial		
➤ Governorship of Adıyaman		
Municipality		

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<ul style="list-style-type: none"> ➤ Gaziantep Municipality ➤ Şehitkamil Municipality ➤ Adıyaman Municipality 	✓	✓
NGOs		
<ul style="list-style-type: none"> ➤ Gaziantep Başpınar Organized Industrial Zone Directorate ➤ Gaziantep Chamber of Industry ➤ Adıyaman Organized Industrial Zone Directorate ➤ Turkish Textile, Knitting, Clothing and Leather Industry Workers Union (TEKSİF) ➤ Sani Konukoğlu Foundation ➤ Gaziantep Şehitkamil Mukhtars Association ➤ Adıyaman Mukhtars Association 		✓
Universities		
<ul style="list-style-type: none"> ➤ Gaziantep University ➤ Hasan Kalyoncu University ➤ Sanko University ➤ Adıyaman University 	x	x
Local Media		
<ul style="list-style-type: none"> ➤ Gaziantep Time Newspaper ➤ Gaziantep Pusula Newspaper ➤ Adıyaman Kent Newspaper 		
Internal Stakeholders		
<ul style="list-style-type: none"> ➤ SANKO Textile 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 and as required	Social Affairs Staff (SAS) / Human Resources (HR) Manager
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	Social Affairs Staff (SAS) / Human Resources (HR) Manager
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	Social Affairs Staff (SAS) / Human Resources (HR) Manager
All affected settlements and Interested parties Local communities Local government	<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, 	Drills Workshops Community meetings	Annual drill programs or as required	Environment and HS Representatives HSE Staff

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Local businesses and industries	2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders.			Social Affairs Staff (SAS) / Human Resources (HR) Manager
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"> 1. Mitigation measures against potential environmental and social risks, 2. Sustainability criteria, 3. Social responsibility projects, implementation principles. 	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	As required / As requested	Social Affairs Staff (SAS) / Human Resources (HR) Manager
<p>Local industries</p> <p>All affected settlements and Mukhtars</p> <p>Şehitkamil Municipality and Adıyaman Municipality</p>	<p><u>Road Transportation and Traffic Safety</u></p> <ol style="list-style-type: none"> 1. Road safety awareness, including on safe crossing of the bypass and access roads, if required, 2. Types, number, and frequency of vehicles that can be anticipated through different phases of the Project, 3. 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, 4. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), 5. Communication of traffic measures and Projectroad 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>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p> <p>Environment and HS Representatives</p> <p>HSE Staff</p>

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements and Mukhtars Şehitkamil Municipality and Adıyaman Municipality	<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"> 1. Environmental and social monitoring program 2. Environmental and social monitoring results 3. Overall information about progress of the Project 	<p>Meetings with Mukhtars</p> <p>Brochures</p> <p>Workshops</p>	<p>As required / As requested</p>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p> <p>Environment and HS Representatives</p> <p>HSE Staff</p>
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>As requested / as required for other meetings</p>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p>
Workforce All affected settlements and mukhtars Local industries Local government Şehitkamil Municipality and Adıyaman Municipality	<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>	<p>Social Affairs Staff (SAS) / Human Resources (HR) Manager</p>
Employees of the Project	<p><u>Employee welfare</u></p>	<p>Face to face interview</p>	<p>Monthly or when required due to the</p>	<p>Social Affairs Staff (SAS) / Human</p>



Target Group		Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Project employees	Contractor	Provision of information on: <ol style="list-style-type: none"> 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures, 4. Contractor management. 	OHS Board Labor audits	results of grievance mechanism	Resources (HR) Manager Environment and HS Representatives HSE Staff

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.sankotextile.com/>) will keep information on the operations updated on an assigned webpage in Turkish and English.

The project website has a contact page where complaints or suggestions can be received (see *Figure 4-1*). The physical address, telephone number, fax number and e-mail address of the Project owner are given.

The contact page contains the links and information of SANKO Textile's communication channels such as whatsapp, instagram and linkedin. On the other hand, external complaints are received through the virtual assistant via WhatsApp connection.

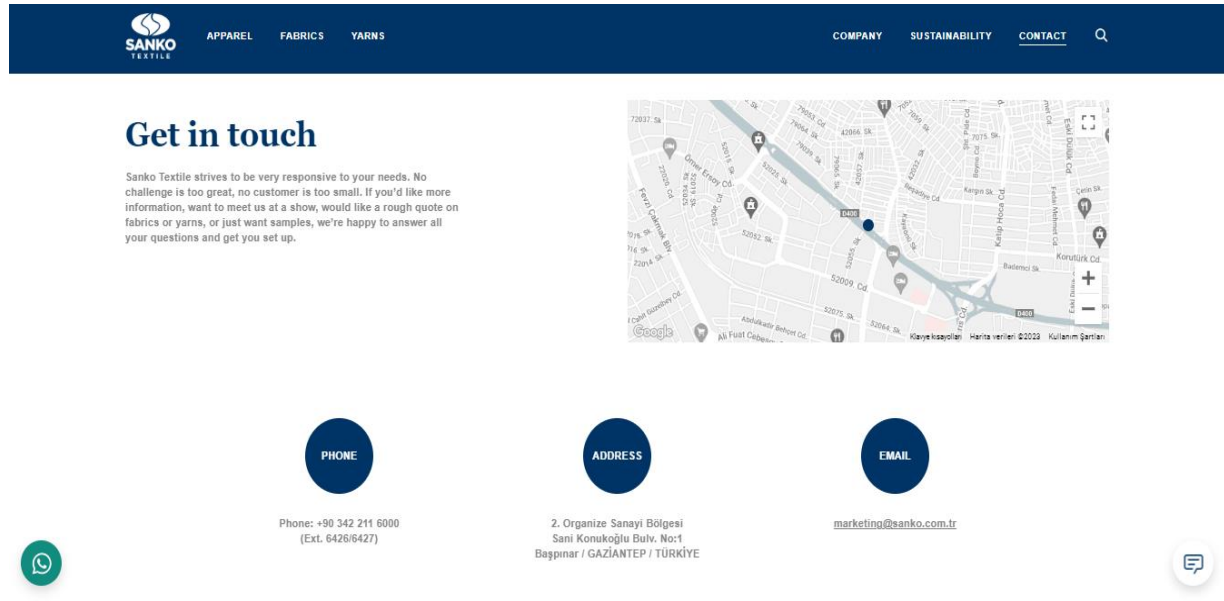


Figure 4-1. SANKO Textile's Contact Page

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

On the other hand, there is a form at the end of the Contact page to subscribe to SANKO Textile's newsletter (see *Figure 4-2*).



Figure 4-2. SANKO Textile's Newsletter Subscription Page

Finally, there is not a contact form for complaints, suggestions and information requests on the Project website. All external complaints are received via the above mentioned social media accounts, phone and email.

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 Redress Mechanism 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 and HS Representatives who are 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 is given in Grievance Mechanism Procedure (SANKO-PRC-SOC-GPM-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 E*);
- The SAS investigates the grievance and makes the first evaluation with the help relevant Units’ 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: Grievance Closure Form*) 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, 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 (General Manager, Deputy General Manager, SAS / HR Manager, Social Compliance / Communication Team, Environment and HS Management Representatives etc.) should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places and in DCC.

For the collection of internal grievances from employees:

- Grievance mechanism process are communicated with all employees (including contractor's employees) during the recruitment process and the first induction training sessions also include the stakeholder engagement and grievance mechanism process;
- Communication about the grievance mechanism is repeated regularly with the toolbox trainings;
- The grievance/suggestion tools are available at the social places (social resting rooms, changing rooms, etc.) in the Project area for internal grievances which are in use by the workers. The tools are connected to internal network, which makes the grievances able to be delivered to relevant departments at any time; and
- All employees are aware of the location of those tools and how to submit their grievances; the employees should be informed in case of any change regarding the location of those tools.

For the collection of external grievances from community:

- Grievance mechanism process will be communicated with external stakeholders during stakeholder engagement meetings;
- The grievance/suggestion boxes will be made available at the Mukhtars' offices or villagers' gathering points (such as tea houses etc.) in the nearest settlements, and the boxes will be checked regularly (at least once a week); and
- Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site, by telephone or with grievance/suggestion boxes).

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. During the resolution of the internal or external grievances, different units can be collaborated such as Environment and HS Representatives, etc.

Details on how grievances are collected and reported are provided in the Grievance Mechanism Procedure (SANKO-PRC-SOC-GPM-001), please refer to the specified procedure for more details.

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.

Table 5-1. Contact Details of the Project

SANKO Textile Industry and Trade Inc. Co.	Contact Person on the Project Site
<p>Website: https://www.sankotextile.com/</p> <p>Social Media Accounts: https://www.linkedin.com/company/sankotextile/ https://www.instagram.com/sankotextile/</p> <p>Project Site Address: 3. Organize Sanayi Bölgesi 83029 nolu cadde No:4 Şehitkamil / Gaziantep</p> <p>Türkiye Petrolleri, Organize Sanayi-14. Sk. No:4, 02040 Petrol Osb/Adıyaman Merkez/Adıyaman</p> <p>E-mail: marketing@sanko.com.tr Phone: +90 342 211 60 00</p>	<p>Contact Persons: Mutlu TOKSÖZ Head Of Sustainability E-Mail: mutlu.toksoz@sanko.com.tr Phone: +90 342 211 6429</p> <p>Gülnur EMRE HR Manager E-Mail: gulnur.emre@sanko.com.tr</p>

5.4 Customer Grievances

SANKO Textile has two documents called "Customer Complaints Procedure" and "Wish and Complaint Procedure" that regulate the processes of communication with internal and external stakeholders, forwarding and evaluation of complaints and suggestions to the company. Also Grievance Mechanism Procedure explains the responsible personnel, the steps to be followed when a customer complaint is received, relevant forms and other documents to be filled up, and the records should be kept in DCC.

"Customer Complaints Procedure" and "Wish and Complaint Procedure" are detailed in the Grievance Mechanism Procedure (SANKO-PRC-SOC-GPM-001).

5.5 Other Grievance Redress Mechanisms

In addition to SANKO Textile'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. 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 in coordination with the Social Compliance / Communication Team.

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

Any revisions to this Plan will be uploaded to the Document Control Center 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

KPI	Target	Monitoring Measure
% 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	The Project will review Grievance Log / Database, including complaints <i>closed</i> and <i>unresolved</i> per period at	Grievance Database	Monthly	Project office

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
	a minimum monthly to include: <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. 			
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Project office
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 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 SANKO Textile 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: Exemption Letter of SANKO Textile

Appendix D: EIA Audit Report of SANKO Textile

Appendix E: Photos of Consultation Activities held by MGS

Appendix F: Grievance Database

Appendix G: 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: Exemption Letter of SANKO Textile



T.C.
GAZİANTEP VALİLİĞİ
Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğü



Sayı : E-46818599-220.03-2647535

Konu : Muafiyet

SANKO TEKSTİL İŞLETMELERİ SAN. VE TİC. A.Ş.
Başpınar (Organize) OSB Mah. OSB 4. Bölge Şehitkamil GAZİANTEP

İlgi : 24.12.2021 tarih ve 2347110 sayılı yazı.

Gaziantep İli, Şehitkamil İlçesi, Başpınar (Organize) OSB Mah. OSB 4. Bölge adresinde, tapunun Ada No: 124, Parsel No: 4'deki taşınmaz üzerinde Sanko Tekstil İşletmeleri San. ve Tic. A.Ş. tarafından yapılması planlanan "İplik Üretim Tesisi" (36.000 ton/yıl) projesi, 25/11/2014 tarih ve 29186 sayılı Resmî Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliği Listelerinde yer almadığından kapsam dışı olarak değerlendirilmiştir.

Ancak, planlanan yatırım ile ilgili olarak, 5491 sayılı kanunla değişik 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer mer'î mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi gerekmektedir.

Bilgi ve gereğini rica ederim.

Enver KURTOĞLU
Çevre, Şehircilik ve İklim Değişikliği İl Müdürü V.


Bu belge, güvenli elektronik imza ile imzalanmıştır.

Doğrulama Kodu: 8BDCBBAC-DBDC-4289-AF10-765C9F0D8F
Budak Mh. Mürşel Feri Çakmak Bul. No:98 Şehitkamil / GAZİANTEP
Tel: 0 342 321 39 03 - Faks: 0 342 321 39 00
e-posta: gaziantep@csb.gov.tr İnternet Adresi: www.csb.gov.tr/filer/gaziantep


Doğrulama Adresi: <https://www.turkiye.gov.tr>

Bilgi için: Demet BÜYÜK
SOKUCU
Elektrik-Elektronik Mühendisi



**T.C.
ÇEVRE VE ŞEHİRCİLİK
BAKANLIĞI**

**T.C.
ADİYAMAN VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü**

ADİYAMAN ÇEVRE VE ŞEHİRCİLİK İL
MÜDÜRLÜĞÜ - ÇED VE ÇEVRE
İZİNLERİNDEN SORUMLU ŞUBE
MÜDÜRLÜĞÜ
25/08/2016 11:47 - 16244257-228.03-E.3763

08064687

Sayı :16244257/220.02
Konu :ÇED Görüşü

SANKO TEKSTİL İŞLETMELİ SAN.TİC.A.Ş
(Organize San. Böl. 15.Cad. No:1)
ADİYAMAN

İlgi: 19.08.2016 tarihli ve 163 sayılı dilekçeniz.

İlgide kayıtlı dilekçede; Sanko Tekstil İşletmeli San.Tic.A.Ş Adıyaman Şubesi, İlimiz Merkez ilçesi, Organize Sanayi Bölgesi 15.Cad. No:1 yer alan, "Pamuk İpliği Üretimi " faaliyetini sürdürmekte olduğu; 28.05.2007 tarih ve 1123 sayılı Çed Muafiyet kararının olduğu ve ÇED Muafiyet kararının yenilenmesi istenmektedir.

Çevresel Etki Değerlendirmesi İzin ve Denetim Genel Müdürlüğünün 01.07.2016 tarih ve 11118 sayılı ÇED Yönetmeliği Uygulamaları yazısında " ÇED Yönetmeliği kapsamında verilen kapsam dışı görüşü, üretim veya işletmeye başlanılmış olması durumunda geçerliliğini devam ettirmektedir" denilmektedir.

Bu kapsamda Müdürlüğümüzce yapılan inceleme neticesinde söz konusu tesisin faaliyette olduğu ve projede herhangi bir değişikliğin olmadığı tespit edilmiştir. Bu neden 28.05.2007 tarih ve 1123 sayılı ÇED Muafiyet görüşünün geçerliliği devam etmektedir.

Yönetmelik kapsamında yer alan projelerin, gerek yatırım gerekse işletme döneminde mevcut durumlarında yapılmak istenen değişikliklere ilişkin projeler kapsamında Projede yapılacak her hangi bir değişiklik halinde Müdürlüğümüze müracaat edilmesi gerekmektedir.

Bahse konu faaliyetin, işletme dönemlerinde çevre kirliliğine yol açmaması, çevre değerlerinin korunmasının amaçlanması ve bu doğrultuda 2872 sayılı Çevre Kanunu ile 5491 sayılı Çevre Kanununda Değişiklik Yapan Kanuna ve bu kanuna istinaden çıkarılan yönetmeliklerin ilgili hükümlerine uyulması, mer'i mevzuat çerçevesinde diğer ilgili kurum ve kuruluşlardan gerekli izinler alınarak, ekolojik dengenin bozulmaması, çevrenin korunması ve geliştirilmesine yönelik tedbirlere riayet edilmesi gerekmektedir.

Gereğini rica ederim.

Fikret ONHAN
Çevre ve Şehircilik İl Müdür V.


**Belgenin Aslı
Elektronik İmzalıdır
Nail GURSOY
Memur**

Atadükür Bulvarı No:164 - 02030 / ADİYAMAN
Telefon: (0 416) 216 19 78-79 Faks: (0 416) 216 24 30
<http://www.csb.gov.tr/iller/adiyaman>

Ayrıntılı bilgi için iribab: M.YILANCI Tekniker
e-posta: adiyaman@csb.gov.tr

u belge 5970 sayılı elektronik imza kanununa göre güvenli elektronik imza ile imzalanmıştır.

Appendix D: EIA Audit Report of SANKO Textile

		Denetimin Başlama - Bitiş Tarihi 01.09/2022-01.10/2022 Saati: 13:00-14:00		Tutanak Seri No. A 579072	
DENETLENEN TÜZEL KİŞİNİN					
Adı		SANKO TEBLİĞİ İÇİNDİRİLMİŞ SANAYİ A.Ş.			
Adresi		05B 15. Cadde No:1 Merkez/ADYAMAN			
Vergi Sicil No.		7660174635		Tel. No. Faks No.	
Yetkili Temsilcisinin Adı Soyadı		Mehmet YILMAZ		T.C. Kimlik No. 18280200368	
DENETİM BULGULARI:					
29.08.2022 tarih ve 416/1131 sayılı yazıyla ÇED sürecine ilişkin ÇED yönetmeliği kapsamında yapılan inceleme neticesinde:					
1) Adıyaman İli, Merkez İlçesi 05B Adliye Adı 3252 Parsel 1-2' de yaklaşık 79.899,82 m ² alanda Sanko Tebligi İstatimeleri Sanayi ve Tic. A.Ş. Adıyaman Şirketi tarafından "Ellyaf Çerme Dairesi Tesisi" kurulacağı,					
2) Ellyaf üretim kapasitesinin 200-300 kg/ik balyalar halinde ve 139.368 ton/yıl ellyaf çıktısı ile yapılacağı,					
3) Tesiste yaklaşık 90 kişinin çalışacağı,					
4) Proje kapsamında parcel ve yerleşimlere uygun olan ihtiyaç dahilinde yurt içi ve yurt dışı kaynaklardan hammadde temin edileceği,					
5) Kalıcı olarak kaynaklı, evren niteliği taşıyan atıklar çöp toplanarak ve atılacak Adıyaman belediyesi, parçacıklarının toplanarak bertarafı yapılacağı,					
6) Kalıcı olarak kaynaklı, evren niteliği taşıyan atıklar çöp toplanarak ve atılacak Adıyaman belediyesi, parçacıklarının toplanarak bertarafı yapılacağı,					
7) Proje kapsamında tesis bünyesinde kullanılan makine ve tesisatların bakım ve onarımından sorumlu kuruluş ile sözleşme imzalandığı ve makine ve tesisatların bakım ve onarımından sorumlu kuruluşün faaliyetleri düzenlenmiş ve raporları düzenli olarak teslim edilerek kontrol edildiği,					
Bazı ve Tesitleri yapılmış olup					
İz ve belgeleri mahallinde mahallinde inza alın					
(Bu alan yetkili makamın her türlü faaliyetleri hakkında devri ve denetim bulgularına ilişkin olarak düzenli olarak ve aynı yetkili taraflara sunulur.)					
Denetimi Gerçekleştiren Birim		Adıyaman Çevre Şehircilik ve İklim Değişikliği İlçe Müdürlüğü			
Denetim Nedeni		Planlı <input type="checkbox"/>		Ani <input type="checkbox"/>	
Tesis Yetkilisinin Adı Soyadı ve İmzası		Mehmet YILMAZ			
Düzenleyenlerin					
Adı Soyadı		Kurumu ve Ünvanı		İmzası	
M. T. YILMAZ		Çevre Şehircilik ve İklim Değişikliği İlçe Müdürlüğü		M. T. YILMAZ	
Onay/Görev Yazısı Tarihi-Sayı					
3 nüsha olarak hazırlanan işbu tutanak mahallinde ... madde ve ... sayfa olarak düzenlendi, taraflarca okunarak doğruluğu kabul ile imzalandı ve bir sureti tesis yetkilisine verildi.					
1. KOPYA TÜZEL KİŞİYE VERİLİR					

Appendix E: Photos of Consultation Activities held by MGS

Consultation with the Director of Adiyaman Petrol OIZ



Consultation with the Director of Gaziantep Başpınar OIZ



Consultation with the Managers of SANKO Textile



Consultation with the TEKSİF Labor Union Representative



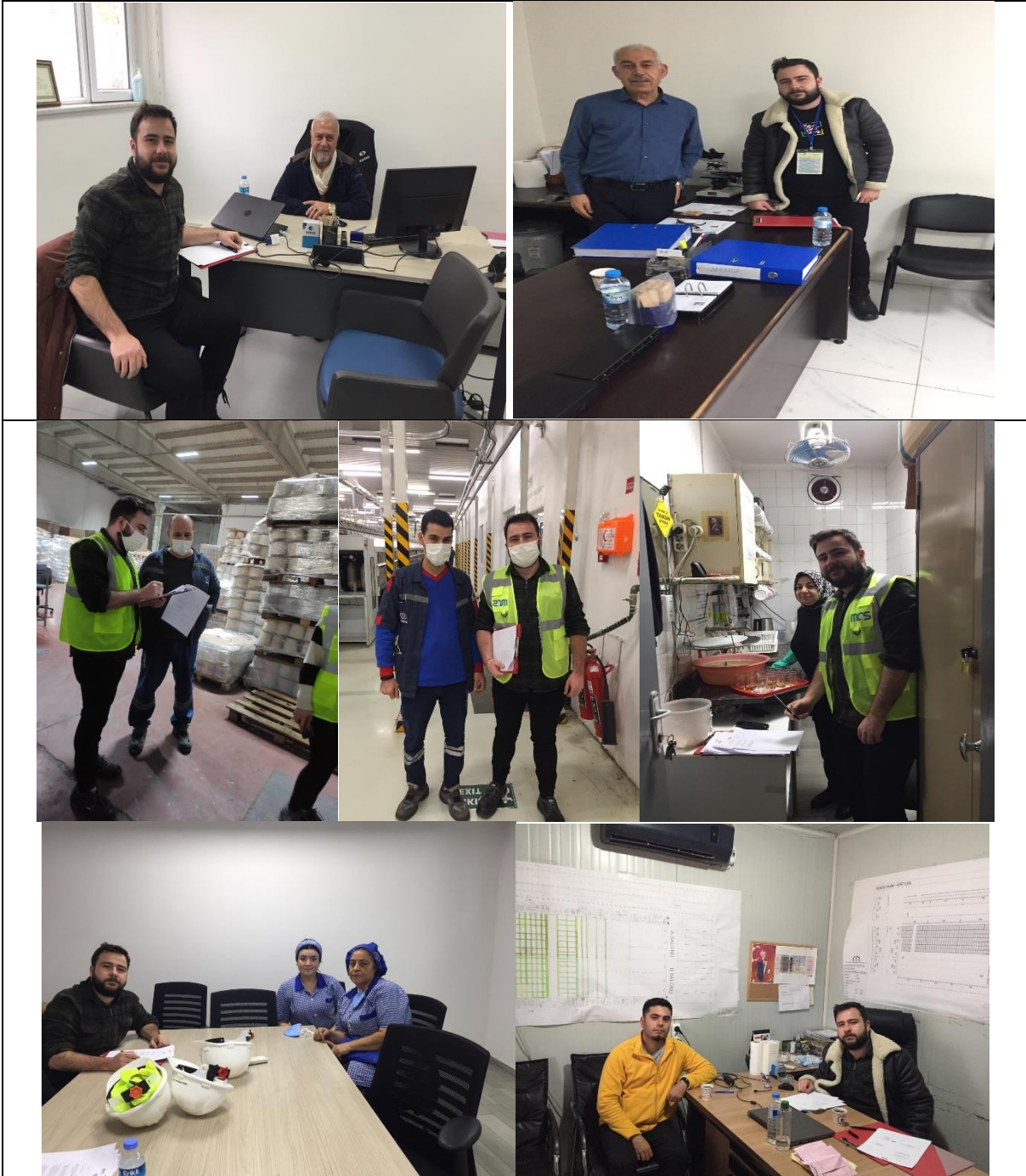
Consultation with Mukhtar of Ataköy Neighborhood



Consultation with Mukhtar of Türkiye Petrolleri Neighborhood



Consultation with the SANKO Textile's Occupational Physician and Health Personnel





Consultation with the SANKO Textile's Employees



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:	Name Surname / Signature of the Person Closing the Complaint
...../...../.....	Name, Surname / Signature of Complainant



Şehit Cevdet Özdemir Mah. Öveçler 4. Cad.,

1351. Sok., No:1/6-7, Çankaya/ANKARA

Tel: 0.312.479 84 00 (pbx), Faks: 0.312.479 84 99

www.mgsmuhendislik.com