



## **Sapro & Lotus Stakeholder Engagement Plan (SEP)**

**April 2026**

## Record of Issue

| Company                                       | Client Contact | Version | Date Issued | Method of Delivery |
|---|----------------|---------|-------------|--------------------|
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## DEFINITIONS

**Grievance Mechanism:** A grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

**Project Affected People:** Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

**Stakeholder:** Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses.

**Public Consultation:** As referred to in this Good Practice Manual, public consultation is a tool for managing two-way communication between the Project sponsor and the public. Its goal is to improve decision-making and build understanding by actively involving individuals, groups, and organizations with a stake in the Project. This involvement will increase a Project's long-term viability and benefit locally affected people and other stakeholders.

**Stakeholder Engagement Plan:** Stakeholder Engagement Plan ("SEP") is a guidance for stakeholder consultations and communications for projects. SEP is a living document that should be updated to provide a roadmap for engagement in monitoring the effectiveness of impact mitigation measures.

**Vulnerable Groups:** Vulnerability status may stem from an individual's or group's race, color, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

## ABBREVIATIONS

|                      |  |
|----------------------|--|
| the Project          | Sapro & Lotus Production Facility  |
| Sapro                | Sapro Temizlik Ürünleri San. ve Tic. A.Ş.  |
| Lotus-1              | Lotus Teknik Tekstil San. ve Tic. A.Ş.   |
| Lotus-2              | Lotus Teknik Tekstil San. ve Tic. A.Ş. Şube 1 Şubesi   |
| WSP Türkiye or WSP   | WSP Danışmanlık ve Mühendislik Ltd. Şti.   |
| Company or Companies | The terms “Company” or “Companies” used in this report are applied to describe the overall operations of two companies (Sapro and Lotus). If a specific situation or issue relates to an individual company, the company’s name is used accordingly. |
| Lotus                | The term “Lotus” used in this report refers to both Lotus Teknik Tekstil San. ve Tic. A.Ş. and Lotus Teknik Tekstil San. ve Tic. A.Ş. Şube 1 Şubesi, and is used to describe the overall operations of these two companies.                          |
| CIMER                | Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)  |
| EIA                  | Environmental Impact Assessment  |
| EHS                  | Environmental, Health, and Safety  |
| ESDD                 | Environmental and Social Due Diligence   |
| ESMS                 | Environmental and Social Management System   |
| GBVH                 | Gender-Based Violence and Harassment   |
| GM                   | Grievance Mechanism  |
| KPIs                 | Key Performance Indicators   |
| JHSU                 | Joint Health and Safety Unit   |
| MoENR                | Ministry of Energy and Natural Resources   |
| MoEUCC               | Ministry of Environment, Urbanization and Climate Change   |
| MoFSS                | Ministry of Family and Social Services   |
| MoH                  | Ministry of Health   |
| MoLSS                | Ministry of Labor and Social Security  |
| MoND                 | Ministry of National Defense   |
| Mol                  | Ministry of Interior   |
| NGOs                 | Non-governmental organizations   |
| PAPs                 | Project Affected Persons   |
| SEP                  | Stakeholder Engagement Plan  |
| TGFP                 | Türkiye Green Finance Project  |
| TSKB                 | Türkiye Sınai Kalkınma Bankası A.Ş.  |
| WB                   | World Bank   |

WB ESSs

World Bank Environmental and Social Standards

WB ESF

World Bank Environmental and Social Framework

## EXECUTIVE SUMMARY

This SEP has been developed for the Project located in Silivri District, İstanbul Province, operated by Sapro Temizlik Ürünleri San. ve Tic. A.Ş. and Lotus Teknik Tekstil San. ve Tic. A.Ş. The SEP is prepared in compliance with WB ESSs, relevant Turkish legislation, and international best practices. It aims to ensure transparent, inclusive, and continuous engagement with all stakeholders throughout the Project lifecycle.

The Project specializes in wet wipes production and spunlace nonwoven fabric manufacturing, with a production capacity of approximately 161 million sheets per day. Operations adhere to Good Manufacturing Practices (GMP) and European hygiene standards. Lotus is the only facility in Türkiye dedicated solely to spunlace fabric for wet wipes, serving multiple sectors including cosmetics, medical, and industrial cleaning.

The SEP aligns with the World Bank ESF and ESSs. It also reflects requirements under the World Bank Group Environmental, Health, and Safety (EHS) Guidelines, Türkiye Green Finance Project (TGFP) Environmental and Social Policy, and national legislation.

Stakeholders include internal groups (Sapro, Lotus, sister companies, subcontractors, suppliers, employees) and external groups (government authorities, NGOs, trade unions, lenders, local communities, media). Vulnerable groups and Project Affected Persons (PAPs) are prioritized for inclusive engagement.

Past activities include collaboration with SiAD and social responsibility initiatives. Future engagement will include disclosure of E&S documents on the company website, dedicated contact channels, Open Days for local communities, and annual reporting on social performance and grievance outcomes.

A comprehensive grievance mechanism is established for internal and external stakeholders, ensuring fair, transparent, and timely resolution of complaints. Grievances can be submitted via multiple channels (grievance boxes, email, phone, in-person, or through mukhtars). GBVH cases are handled through an Ethics Line.

The SEP will be reviewed annually and updated as needed. Grievances are logged monthly by HR, with quarterly reports to management. KPIs include registration of engagement activities, disclosure of E&S documents, grievance resolution timelines, and annual audits. External reporting will ensure transparency via the company website, while maintaining confidentiality.

All workers and contractors receive induction and annual refresher training on SEP, grievance mechanisms, ethical standards, and GBVH awareness to ensure effective implementation.

By implementing this SEP, the Project demonstrates its commitment to ESS10, other applicable ESSs, and international best practices.

## 1. Introduction

This Stakeholder Engagement Plan (“SEP”) is prepared for the Project located in Silivri District of İstanbul Province (“the Project”) by WSP Danışmanlık ve Mühendislik Ltd. Şti. (herein after “WSP”) on behalf of Sapro Temizlik Ürünleri San. ve Tic. A.Ş. (“Sapro”) and Lotus Teknik Tekstil San. ve Tic. A.Ş. (“Lotus”) (here in after referred as “Sapro” and “Lotus”) for implementing the Project in compliance with the national and international requirements. Sapro, established in 1997, is engaged in the production of wet wipes with a product portfolio of nearly 1,500 varieties. The company manufactures products in various categories, including baby care, personal care, household cleaning, pet care, car care, industrial cleaning, and biocidal products. Product formats include foil and canister packaging, single-use sachets, travel-size products, and pocket wipes. The Project operates in line with Good Manufacturing Practices (“GMP”) requirements and European Commission hygiene standards. The company’s production capacity is approximately 161 million sheets per day, with a closed area of 50,000 m<sup>2</sup> and a storage capacity of 20,000 pallets.

Lotus, established in 2016 and operational since 2017, produces spunlace nonwoven fabrics exclusively for wet wipes. It is the only facility in Türkiye dedicated solely to spunlace fabric for wet wipes and one of the few globally. Lotus manufactures hygienic spunlace fabrics tailored to different sectors, including cosmetics and personal care, household cleaning, medical use, automotive care, and industrial cleaning. The production focuses on customized fiber blends and fabric structures to meet high standards required for hygiene, durability, and sector-specific performance.

This SEP is prepared as part of the Environmental and Social Due Diligence (“ESDD”) process to assess the compliance or otherwise of the Project with the applicable World Bank Environmental and Social Framework (“WB ESF”) including World Bank Environmental and Social Standards (“WB ESSs”) and World Bank Group Environmental, Health, and Safety (“EHS”) Guidelines, Türkiye Green Finance Project (“TGFP”) Environmental and Social Policy, and current Turkish legislation.

This SEP will enable all processes of interaction with stakeholders who are directly or indirectly affected by the Project or who are interested in the Project’s outcomes. During the execution of the Project, SEP will be implemented in accordance with the requirements of Turkish national laws/regulations, applicable WB ESF, including WB ESSs and WB EHS Guidelines and TGFP Environmental and Social Policy.

This SEP identifies the Project stakeholders, target groups and the specific engagement activities required for each group of stakeholders of the Project. The SEP is a living document and will be continuously updated to reflect any changes or developments throughout the lifecycle of the Project.

The Project will be committed to the following principles based on the best international practices to obtain effective stakeholder engagement such as:

- Commitment to understand, engage and identify the community at the early stages of the Project,
- Integrity in a way that encourages mutual respect and trust,
- Respect the rights, cultural beliefs, values, and interests of stakeholders and affected communities,
- Transparency in community concerns and respond in a timely, open, and effective manner,
- Establishing an inclusive engagement process by ensuring the meaningful participation of vulnerable groups in the Project affected settlements,
- Ensuring equal participation in all stakeholder engagement processes with a gender-sensitive approach, and,

- Establishment of a Project-specific grievance mechanism (both internal and external) to ensure a technically and culturally appropriate approach for engagement with all stakeholders.

### **1.1. Objective of the Stakeholder Engagement Plan**

A project-specific SEP is a strategic tool to manage relationships, address concerns, and ensure stakeholders are appropriately involved and informed about the Project. The purpose of this SEP is to ensure that the Project stakeholders, including the Project affected people and other interested stakeholders, are informed about the Project in a timely manner with consistent, comprehensive, relevant, accessible, and transparent information. The SEP ensures a participatory approach, and the implementation of the SEP is intended to elicit opinions and concerns regarding the Project and its impacts.

The primary objectives of this document are to:

- Identify stakeholders,
- Outline processes for informing stakeholders about the Project,
- Review current stakeholder engagement activities and outline planned future activities,
- Set up a grievance mechanism, including a process for addressing feedback and concerns,
- Define Project commitments, and procedures relevant to this Plan,
- Define roles and responsibilities related to engagement activities,
- Define training requirements; and,
- Establish a framework for monitoring engagement activities.

### **1.2. Scope of the Stakeholder Engagement Plan**

This Plan applies to all Project-related activities, including those of all contractors, during all phases of the Project. Once approved by Sapro and Lotus, all contractors shall comply with the requirements and standards set out in this Plan.

## **2. Project Description**

### **2.1 Project Overview and Location**

The Project is situated in an industrial area alongside several other facilities in the Ortaköy Neighborhood of Silivri District, İstanbul Province. The nearest residential settlement, which is the Ortaköy Neighborhood, is approximately 2 km away, and a residential building is located approximately 360 meters from the Project. There are no sensitive receptors such as schools, hospitals, or protected areas in the immediate vicinity.

Developed as a greenfield site and in operation since 1997, the Project is currently jointly operated by Sapro and Lotus under the same roof, while the land remains under the ownership of Multipak Ambalaj San. ve Tic. A.Ş. (“Multipak”). Both Sapro and Lotus conduct their operations through lease agreements with Multipak. Previously, Multipak also operated on the premises; however, its activities ceased following the official acquisition of the plastic injection machines area by Sapro.

In addition to the Project, Multipak and Tetra Pazarlama ve Dış Ticaret A.Ş. (“Tetra”), both entities under the same holding group, continue their operations in a separate facility located approximately 1 km from the Project.

As part of the Project, a shared warehouse facility serves both Sapro and Lotus for the storage of raw materials and finished goods. A section of this warehouse has been developed into a smart

(automated) warehouse, aiming to enhance operational efficiency, support timely distribution, and reduce occupational safety risks. Testing and implementation of the smart warehouse system are currently ongoing. The Project location is presented in Figure 1.

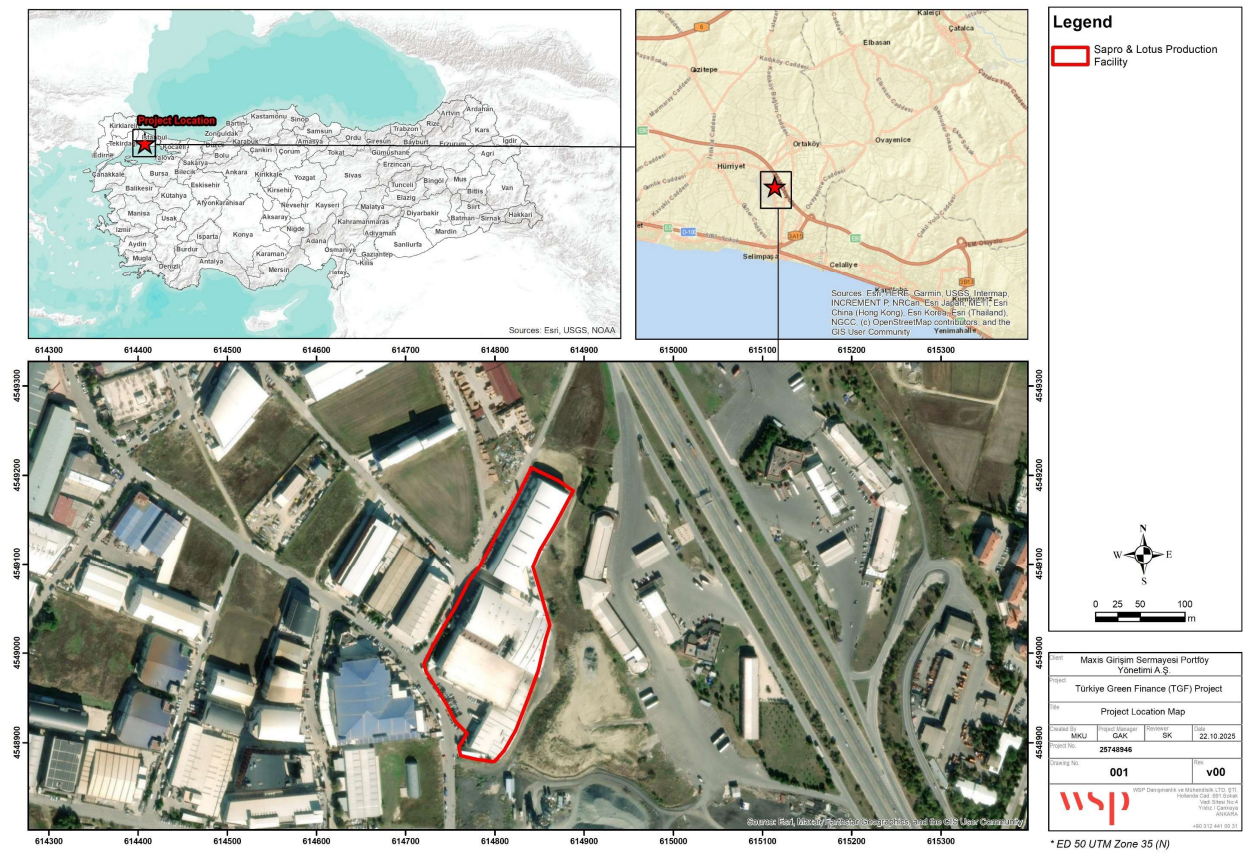


Figure 1: Project Location

### 3. Regulatory Requirements

#### 3.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

##### 3.1.1 The Constitution of The Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

#### PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

#### PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. 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 impart information and ideas without interference from official authorities.

## **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing**

A. Health Services and Conservation of the Environment: ARTICLE 56. Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

## **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth**

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

## **PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition**

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

### **3.1.2 Other main national laws/regulations**

#### **I. Civil Law**

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

#### **II. Law on the Right to Information**

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organizations, which qualify as public institutions.

#### **III. Law on the Use of Right to Petition**

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

#### **V. Environmental Law and Environmental Impact Assessment Regulation**

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens, and the state bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (29.07.2022, OG No. 31907).

The projects requiring an EIA Report, the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29<sup>th</sup>, 2022.

The relevant requirements regarding the EIA process have been disclosed to the public in accordance with the Environmental Impact Assessment Regulation of the MoEUCC of the Republic of Turkey.

### ***Environmental Impact Assessment Regulation***

Information sharing and stakeholder engagement are carried out in accordance with Article 9(5) of the Environmental Impact Assessment (EIA) Regulation, which entered into force upon publication in the Official Gazette dated July 29, 2022, and numbered 31907. This article states:

“A SEP shall be prepared by institutions/organizations authorized by the Ministry in order to inform the public about the Project and its impacts, and to gather the public’s opinions and suggestions regarding the Project. The prepared SEP shall be submitted as an annex to the EIA application file. If deemed necessary, the Ministry may request the authorized institutions/organizations to carry out additional activities throughout the EIA process for the purpose of informing the public, such as distributing informative brochures, conducting surveys, holding seminars, or creating a project-specific website for information sharing. Additionally, the plan may be updated during the EIA process if requested by the Ministry.”

For projects listed under Annex-1 of the EIA Regulation, it is a legal requirement to organize a “Public Information and Participation Meeting” to inform the local population affected by the Project, and to receive their concerns and opinions. This meeting is the only officially structured opportunity for stakeholder engagement. For Annex-2 projects, however, such a public participation meeting is not required.

***Within the scope of the Project, EIA opinion requests were submitted to the PDoEUCC for the Sapro, Lotus-1, and Lotus-2 areas, which were subsequently classified as “EIA-Exempt” on December 16<sup>th</sup>, 2022, July 12<sup>th</sup>, 2024, and December 2<sup>nd</sup>, 2022, respectively. Hence, since the Project was classified as EIA-Exempt, no public participation meeting or formal consultation process was conducted within the scope of the national EIA procedure.***

## **3.2 International Standards**

The following international standards and guidelines constitute the Project Standards:

- Local, national, and regional environmental, social, health and safety laws and regulations, including national obligations under international law that apply to the Project,
- TGFP Environmental and Social Policy,
- World Bank Environmental and Social Framework (“WB ESF”),
- World Bank Environmental and Social Standards (“WB ESSs”),
- World Bank Group’s General and Sector Environmental, Health, and Safety (“EHS”) Guidelines, as applicable.

### **3.2.1 World Bank Environmental and Social Standards (WB ESSs)**

The World Bank’s **ESF** sets out the commitment to sustainable development through a set of standards that support borrowers in identifying, assessing, and managing the environmental and social risks and

impacts of projects. The ESF is designed to ensure strong stakeholder engagement, transparency, and accountability throughout the Project's life cycle.

The following **ESSs** are applicable to this Project:

- **ESS1:** Assessment and Management of Environmental and Social Risks and Impacts
- **ESS2:** Labor and Working Conditions
- **ESS4:** Community Health and Safety
- **ESS5:** Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- **ESS8:** Cultural Heritage
- **ESS10: Stakeholder Engagement and Information Disclosure**

In line with **ESS10**, the Project is required to develop and implement a SEP to the nature and scale of the Project and its potential risks and impacts. The SEP should be inclusive and responsive to the needs of all stakeholders, with particular attention to disadvantaged or vulnerable groups.

The ESSs require the Project to:

- Identify and evaluate potential environmental and social risks and impacts,
- Adopt the mitigation hierarchy to anticipate and avoid risks and impacts, or where avoidance is not possible, minimize, mitigate, and, as a last resort, compensate for residual impacts,
- Establish and maintain an Environmental and Social Management System ("ESMS") that ensures continuous monitoring and improvement of environmental and social performance,
- Ensure that grievances from affected communities and other stakeholders are addressed in a timely, transparent, and culturally appropriate manner through a Project grievance mechanism,
- Disclose relevant environmental and social information and engage meaningfully with stakeholders throughout the Project cycle,
- Verify that any community representative engaged in consultations genuinely represents the views and interests of their communities and can communicate outcomes reliably.

The **World Bank ESSs** collectively provide a framework for managing the Project's environmental and social risks while promoting sustainable development outcomes, social inclusion, and equitable stakeholder participation.

Stakeholder engagement encompasses a range of activities throughout a project's life, divided into key components:

- **Stakeholder Identification and Analysis:** Identify and prioritize stakeholders by understanding their interests and concerns.
- **Information Disclosure:** Share relevant information with stakeholders early and consistently, ensuring it's accessible and meaningful.
- **Stakeholder Consultation:** Plan and conduct inclusive consultations, document the process, and communicate outcomes.
- **Grievance Management:** Set up accessible systems for stakeholders to raise concerns and grievances throughout the project.
- **Monitoring:** Involve stakeholders in monitoring the project's impacts, mitigation measures, and benefits, while also including external monitors for added transparency.

- **Reporting to Stakeholders:** Provide regular updates on the project's environmental, social, and economic performance.
- **Management Functions:** Ensure the company has the capacity to manage stakeholder engagement, track commitments, and report progress.

### 3.2.2 Applicable Policies and Management System of the Company

Sapro and Lotus operate in accordance with a comprehensive set of internal policies, plans, processes and procedures that reflect their commitment to the environment, occupational health and safety, ethical conduct, social responsibility, and sustainable development. ESMS documentation of Sapro and Lotus are provided below.

ESMS documentation of Sapro:

- Environmental Policy
- OHS Policy
- Human Resources Policy
- Sustainability / Social Responsibility Policy
- Social Compliance Policy
- Emergency Plan
- Environmental Emergency Plan
- Management Systems Manual
- Code of Business Ethics Handbook
- Social Responsibility Handbook
- Personnel Recruitment and Hiring Procedure
- Personnel Regulation
- Overtime Work Procedure
- Overtime Approval Form
- Leave Procedure
- Internal Request, Complaint, and Suggestion Mechanism
- Instant Reward and Suggestion Award System Procedure
- Foreign Worker Employment Procedure
- Subcontractor Service Procurement Process
- Supplier Evaluation Process
- Supplier Social Compliance Self-Assessment Form
- Social Compliance Policy Implementation Process
- OHS Commitment Declaration
- OHS Management Process

- OHS Internal Regulation
- Environmental Management Process
- Sustainability Process
- Overtime Process

ESMS documentation of Lotus:

- Environmental Policy
- OHS Policy
- Social Compliance Policy
- Management Systems Manual
- Social Responsibility Handbook
- Code of Business Ethics Handbook
- Subcontractor Service Procurement Process
- Supplier Evaluation Process
- OHS Commitment Declaration
- Emergency Process
- Incident Investigation Process
- Workwear – Personal Protective Equipment Usage Process
- OHS Internal Regulation
- Social Compliance Policy Implementation Process
- OHS Management Process
- Hazardous Waste Temporary Storage Area Process
- Waste Management Process
- Environmental Management Process
- Environmental Aspect Assessment Process

These standards ensure compliance with national and international regulations, promote transparency, and foster a safe, inclusive, and respectful working environment for all employees and stakeholders.

## 4. Stakeholder Identification and Analysis

The first step in stakeholder engagement is identifying who the project stakeholders are, along with their main groups and subgroups. Following this, stakeholder analysis takes a deeper dive into understanding their interests, how they may be impacted, and the level of influence they might have on the project.

The overall objective of stakeholder identification is to identify and prioritize project stakeholders for informed consultation and participation. Stakeholder identification is a continuous process. The list of identified stakeholders will be evaluated and for different phases of the Project and Project updates.

Potential stakeholders will be categorized and prioritized based on stakeholder status, level of interest or ability to influence.

A designated employee, who serves as key points of contact between the Project and its stakeholders, will be appointed to manage communication, gather stakeholder feedback, and oversee the grievance mechanism. If there are female applicants for this role, their applications will be prioritized to encourage women's participation, receive and report gender-specific grievances, and conduct women-only consultation activities when needed.

### 4.1. Affected parties and other interested parties

In general, stakeholders can be categorized into two groups:

- Primary stakeholders are the individuals and communities directly affected by the Project's impacts; and
- Secondary stakeholders are those who have an interest or influence on the Project.

Primary and secondary stakeholders include:

- International bodies and organizations (e.g. international investors, international financial institutions, international non-governmental organizations (“NGOs”)),
- National government agencies,
- Regional government agencies/authorities,
- Local authorities,
- National and local NGOs and organizations,
- Trade Unions and Associations,
- Education and training institutions (e.g. universities, education centers),
- Industry (e.g. construction and infrastructure trade associations),
- Project Affected People (PAPs),
  - Mukhtars/local authorities of Project-affected settlements,
  - Local community members,
  - Landowners and land users (formal and informal land users), and
  - Affected businesses and employees of businesses
  - Vulnerable groups: elderly, people with disabilities, female-headed households, landless households and/or individuals, ethnic minorities, immigrants, refugees, etc.
- Project workers and workers' representatives,
- Third party suppliers of goods and services, contractors and their subcontractors,
- Social services (e.g. hospitals, local schools and other local community services), and
- Media.

Table 1 given below represents the identified stakeholders in accordance with the stakeholder identification approach.

**Table 1: Project's Stakeholder Classification**

| Type  | Stakeholders  | Primary stakeholders |          | Secondary stakeholders | Interested / Affected |
|---|---|----------------------|----------|------------------------|-----------------------|
|   |   | Direct               | Indirect |                        |                       |
| <b>Internal Stakeholders</b>                  |   |                      |          |                        |                       |
| <b>Project Owner</b>                          | Sapro and Lotus   | X                    |          |                        | Affected              |
| <b>Sister Companies</b>                       | Multipak<br>Tetra   | X                    |          |                        | Affected              |
| <b>Landowner</b>                              | Multipak  | X                    |          |                        | Affected              |
| <b>Subcontractors</b>                         | Security (Securitas), catering (Sardunya), cleaning (ISS), wastewater treatment (BDK), temporary staffing (Elit and ESS), transportation (Gür-sel), environmental consultancy services (Avrasya Ölçüm ve Çevre Danışmanlık Hizmetleri Ltd. Şti), and Doğrular Joint Health and Safety Unit ("JHSU") | X                    |          |                        | Affected              |
| <b>Suppliers / Service Providers</b>          | <ul style="list-style-type: none"> <li>• Lotus as the primary supplier of Sapro</li> <li>• 116 companies for raw materials and packaging*</li> <li>• 112 companies for technical procurement and services*</li> </ul> *Subject to revision whenever changes occur                                   | X                    |          |                        | Affected              |
| <b>Employees</b>                              | Project employees   | X                    |          |                        | Affected              |
| <b>Consultants</b>                            | Project consultants – if any.   | X                    |          |                        | Interested            |
| <b>External Stakeholders</b>                  |   |                      |          |                        |                       |
| <b>International bodies and organizations</b> | Lenders, potential lenders  |                      |          | X                      | Interested            |
| <b>National Governmental Authorities</b>      | Ministry of Environment, Urbanization and Climate Change (MoEUCC)<br>Ministry of Labor and Social Security (MoLSS)<br>Ministry of Health (MoH)<br>Ministry of Energy and Natural Resources (MoENR)<br>Ministry of Interior (MoI)<br>Ministry of Family and Social                                   |                      |          | X                      | Interested            |

| Type   | Stakeholders  | Primary stakeholders |          | Secondary stakeholders | Interested / Affected |
|--|---|----------------------|----------|------------------------|-----------------------|
|  |   | Direct               | Indirect |                        |                       |
|  | Services (MoFSS)<br>Ministry of National Defense (MoND)   |                      |          |                        |                       |
| <b>Regional/Local Authorities</b>                          | İstanbul Governorship<br>Silivri District Governorate<br>İstanbul provincial directorates of central government institutions<br>Silivri district directorates of central government institutions<br>Doğu Marmara Development Agency<br>İstanbul Municipality<br>Silivri Municipality<br>Mukhtars of the affected settlements (villages and neighborhoods) | X                    |          |                        | Interested            |
| <b>National and Local NGOs and organizations</b>           | Chambers of Commerce and Industry<br>City Councils<br>Nature Association<br>Social Aid and Solidarity Promotion Fund<br>TEMA<br>Turkish Association of Mukhtars<br>Union of Chambers and Commodity Exchanges of Türkiye (TOBB)<br>WWF Türkiye<br>Women-specific associations<br>İŞKUR   |                      |          | X                      | Interested            |
| <b>Trade unions and associations</b>                       | Silivri Industrialists and Businessmen Association (SiAD)<br>Silivri United Chamber of Tradesmen and Craftsmen (SİBESO)   | X                    |          |                        | Interested            |
| <b>Education and training institutions</b>                 | Silivri District Directorate of National Education<br>Silivri Public Education Center   |                      |          | X                      | Affected              |
| <b>Social services</b>                                     | Silivri State Hospital  |                      | X        |                        | Affected              |
| <b>Industrial sectors</b>                                  | Neighboring facilities such as:<br>Hobi Egzoz Yedek Parça Ltd.Şti.<br>Çem-San Çelik Mobilya   | X                    |          |                        | Affected / Interested |
| <b>Local communities / Affected settlements / Mukhtars</b> | Ortaköy Neighborhood  |                      | X        |                        | Affected              |

| Type         | Stakeholders  | Primary stakeholders |          | Secondary stakeholders | Interested / Affected |
|--------------|---|----------------------|----------|------------------------|-----------------------|
|              |   | Direct               | Indirect |                        |                       |
| <b>PAPs</b>  | Local communities of Ortaköy Neighborhood<br>Vulnerable groups within the local communities<br>Nearest residential building |                      | X        |                        | Affected              |
| <b>Media</b> | Silivri Hürhaber Newspaper<br>Gazete Silivri Newspaper<br>Değişim Newspaper<br>Silivri News Agency                          |                      |          | X                      | Interested            |

## 4.2. Vulnerable groups

Vulnerability refers to an individual or group's race, color, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. Other factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources are also considered. Vulnerable groups include the older population, children, people with disabilities, minorities, and people living in poverty. Vulnerable groups can be affected by project impacts differently than others and do not have equal access to the project opportunities and benefits.

Special consideration and assistance will be provided to people if identified as vulnerable to ensure inclusiveness in decision making, grievance mechanism and consultation. It will be ensured that targeted consultation is established. All Project related information will be provided to vulnerable groups in a timely and culturally appropriate manner.

## 5. Stakeholder Engagement Tools

Table 2 outlines the tools and methods used to support effective stakeholder engagement throughout the Project. In this context, a tool refers to any channel, mechanism, or activity designed to inform, consult, or involve stakeholders in a meaningful way. The aim is to ensure that all stakeholders can access information and participate in the Project using the means most appropriate to their needs and preferences. The effectiveness of these tools will be regularly monitored, and additional or alternative tools may be introduced as needed to enhance engagement.

**Table 2: Stakeholder Engagement Tools**

| Stakeholder Engagement Tools | Content of the Tools   |
|------------------------------|--|
| <b>Community meetings</b>    | Held with local communities to inform about project impacts, and explain grievance mechanism, if needed and where feasible.  |
| <b>Official meetings</b>     | Held with NGOs, business associations, governmental parties for consultation and collaboration, if needed.   |
| <b>Project website</b>       | Central online platform for up-to-date project information and documents. Discloses Environmental and Social (E&S) documents, SEP, grievance mechanism, contact information. |
| <b>Online meetings</b>       | Conducted with NGOs and governmental institutions if needed.   |
| <b>Phone calls, e-mails</b>  | Enables all stakeholders to share grievances via a phone number and  |

| Stakeholder Engagement Tools  | Content of the Tools   |
|---|--|
|   | e-mail address.  |
| <b>Grievance Mechanism</b>  | Structured system for all stakeholders (internal and external) to raise concerns via post, email, phone, or in person. A separate mechanism is available for external and internal grievances. |
| <b>Grievance boxes for internal stakeholders (mainly for employees)</b> | Boxes placed in accessible areas (e.g., cafeteria, rest zones) for employees to submit concerns and suggestions.   |
| <b>Newspaper</b>  | Used for public announcements and major project updates affecting the society.   |
| <b>Focus Group Discussions (“FGDs”)</b>                                 | 1–1.5-hour discussions with 6–12 people from targeted groups (e.g., women, elderly, disabled, refugees), facilitated by a moderator.   |

## 6. Previous Stakeholder Engagement and Consultation Activities

Stakeholder engagement includes facilitating clear and accessible disclosure of E&S information by distributing relevant data and reports to stakeholders. It also entails meaningful stakeholder consultation, implementing a structured approach to engage stakeholders, ensuring their active involvement in the Project’s development through open consultations, soliciting feedback, and integrating valuable insights shared by stakeholders.

### 6.1 Stakeholder Engagement Activities to Date

There is ongoing communication with the Silivri Industrialists and Businessmen’s Association (SİAD), one of the key stakeholders and main local partners. Sapro and Lotus aim to make a positive contribution to the local industrial community and actively support the association’s social responsibility initiatives. As part of these efforts, hygiene packages have been provided to schools, aid has been delivered during earthquakes, Silivrispor has been sponsored, and Ramadan assistance packages have been distributed in collaboration with SİAD. Through this collaboration, referrals of skilled job applicants are received via email and evaluated to support local employment opportunities.

## 7. Future Consultation and Information Disclosure Activities

This SEP is developed to engage with the stakeholders to inform stakeholders on the Project activities, resolve their grievances, and involve stakeholders during the decision-making processes in a participatory approach. Future consultation and information disclosure activities will be designed to inform, disclose, and consult with all relevant stakeholders through a variety of culturally appropriate and inclusive engagement tools. Informed Consultation and Participation (ICP) throughout Sapro and Lotus’ operations will be maintained, with full respect for human rights and gender inclusion principles.

A designated person and department will be appointed to manage external stakeholder engagement and monitor SEP implementation, and their contact details will be disclosed.

### 7.1 Proposed Strategy for Future Activities

- Project E&S documents and the SEP will be disclosed at the Company website and will be available in Turkish and English. Further announcement regarding the Project updates and awareness, the Company website will be used.
- If local communities, NGOs, associations and other interested groups want to be informed about Sapro and Lotus operations, they can contact the phone numbers on the website, the security unit at the Project site entrance, and the info@sapro.com.tr e-mail address.

- Sapro and Lotus undertake to share information that is not commercial and industrial secrets with transparency.
- If the information requests from the local people increase, Sapro and Lotus may organize an Open Day for groups of at most five people.
- Consultation meetings with relevant stakeholders, such as SIAD, will continue to be consulted throughout the Project lifecycle.
- Consultation and information disclosure activities are recorded with the “Stakeholder Engagement Register,” which is presented in **APPENDIX A - Stakeholder Engagement** , respectively.
- The designated department will prepare annual reports that present the Project’s social performance and the engagement activities, and the grievance mechanism outputs.

### **8. Stakeholder Engagement Program**

The proposed stakeholder engagement program is presented in Table 3.

The SEP will undergo annual updates to incorporate the latest Project developments and information. Stakeholder identification will be reassessed, and the stakeholder list will be updated accordingly.

Regular stakeholder engagement activities will be conducted throughout the operation of the Project to keep stakeholders informed about Project progress.

**Table 3: Stakeholder Engagement Program**

| <b>Project stage</b> | <b>Target stakeholders</b>   | <b>Topic(s) of engagement</b>  | <b>Engagement Tool</b>   | <b>Location</b>                            | <b>Frequency</b>  | <b>Responsibilities</b> |
|----------------------|--|--|--|--|---|-------------------------|
| <b>Operation</b>     | <b>Governmental Parties</b><br>Municipalities, governorates, district authorities, academic institutions | Project scope, Project E&S performance, grievance mechanism  | 1. Disclosed SEP<br>2. Company website<br>3. Face-to-face or online meetings<br>4. Stakeholder visits<br>5. Emails | Relevant public institutions, Project Site | 1. & 2. & 5. Ongoing during operation<br><br>3. & 4. If needed around key milestones or if coordination is required | Sapro and Lotus         |
|                      | <b>Non-Governmental Parties</b><br>NGOs, media, workers' and business organizations                      | Disclosure of Project documents, stakeholder roles, grievance mechanism, E&S performance   | 1. Disclosed SEP<br>2. Company website<br>3. Face-to-face or online meetings<br>4. Stakeholder visits<br>5. Emails | Project Site, NGO offices                  | 1. & 2. & 5. Ongoing during operation<br><br>3. & 4. If needed around key milestones or if coordination is required | Sapro and Lotus         |
|                      | <b>Local communities</b>   | Operation impacts, community health and safety, grievance mechanism, environmental and social risks and performance, contact information, local employment | 1. Disclosed SEP<br>2. Company website<br>3. Meetings with Mukhtars  | Nearest settlements, and public areas      | 1. & 2. Ongoing during operation<br>3. If needed  | Sapro and Lotus         |
|                      | <b>Other Interested Parties (External)</b>   | Information disclosure (national/local media), E&S performance   | 1. Company website<br><br>2. Newspapers  | Online platforms                           | 1. & 2. If needed when significant environmental/social issues or media/public interest events occur                | Sapro and Lotus         |

## 9. Grievance Mechanism

The *IFC Good Practice Note: Addressing Grievances from Project-Affected Communities 2009* defines a grievance as “a concern or complaint raised by an individual or a group within communities affected by company operations” (p. 8). Projects should develop a grievance mechanism to provide a structured way for addressing these concerns, ensuring transparency and responsiveness in handling grievances. This procedure is designed to outline indicators for effectively managing community and employee complaints that may arise from Project activities.

A Grievance Mechanism (GM), including a grievance form (Appendix B and Appendix C), has been established and disclosed within the Project EIA Report. The Project’s GM will be developed as a part of this SEP, ensuring that the grievances from the stakeholders are resolved in a fair, transparent, and timely manner.

The Grievance Mechanism will cover all internal and external stakeholders and all employees. The grievance mechanism is the key tool that allows stakeholders to provide feedback, concerns and complaints related to the Project. The grievance mechanism aims to demonstrate responsiveness to stakeholder needs and facilitate a trustworthy and constructive relationship with the stakeholders by developing appropriate mitigation strategies. The objectives of the grievance mechanism are to:

- Provide affected people with culturally appropriate ways and means of stating their grievances during the Project,
- Ensure that grievances are treated confidentially and are not shared outside the process,
- Establish transparent and mutually respectful relations with communities,
- Ensure that corrective actions are identified and taken,
- Verify that affected people are satisfied with the corrective actions taken, and
- Avoid the need for judicial actions; the grievance mechanism, however, does not prevent stakeholders from accessing the judiciary system.

Grievances can be submitted by internal and external stakeholders through the following methods:

- Grievance boxes at the Project Site reception,
- Submitting grievance in person to mukhtars and/or grievance form to be submitted via mukhtar,
- By mail (to the postal address of Sapro and Lotus),
- Via e-mail to Sapro and Lotus,
- Submitting a grievance by Company phone number,
- Submitting grievance in person to the Project Site.

The requests will be logged in a Request & Grievance Log / Database (Appendix D). The request will be logged as a worker or community request, and the grievances will be logged in a grievance registration system in categories. The grievances can be categorized as:

- Environmental issues (e.g., noise, dust, waste management) related complaints,
- Labor or occupational health and safety-related complaints,
- Reports of discriminatory treatment based on gender, age, disability, religion, language, race, sect, ethnicity, social status, political views, health condition, marital status, etc.,
- Grievances related to Gender-Based Violence and Harassment (“GBVH”), sexual abuse, harassment, exploitation, and assault,

The grievance management process will follow these key steps to ensure timely and effective resolution:

- 1) **Grievance Submission** – Stakeholders may submit grievances through various accessible channels (e.g., in person, via phone, email, or grievance boxes).
- 2) **Registration and Logging** – Each grievance will be recorded in the grievance register, assigned a reference number, and categorized for tracking.
- 3) **Acknowledgement** – Complainants will receive confirmation of receipt within a defined timeframe, if not anonymous.
- 4) **Review and Assessment** – The grievance will be evaluated to determine its eligibility, seriousness, and urgency. Based on its nature and submission channel, it will be forwarded either to the relevant department or to the Board of Directors.
- 5) **Investigation and Response** – A fair and transparent investigation will be conducted, followed by a proposed resolution or corrective action.
- 6) **Feedback and Closure** – The proposed outcome will be shared with the complainant. If accepted, the grievance will be formally closed and documented.
- 7) **Follow-up (if needed)** – In cases requiring corrective action, follow-up will be conducted to verify implementation and effectiveness.

Grievances related to GBVH are managed through established ethics and compliance procedures. An Ethics Line has been set up by Sapro and Lotus as a confidential reporting channel to allow employees to raise concerns anonymously and securely. Reports submitted through the Ethics Line are documented and reviewed by an independent team to ensure impartiality. In cases involving serious allegations, the matter is escalated directly to the Board of Directors for further action.

### 9.1 Türkiye Green Finance Project (“TGFP”) Grievance Mechanism

Türkiye Sınai Kalkınma Bankası A.Ş. (“TSKB”) and Maxis have their own comprehensive Grievance Mechanisms to receive complaints from Fund stakeholders through their respective websites, Fund-specific e-mail addresses, or phone lines. These communication channels are presented separately in the table below.

| TSKB Communication Channel |   |
|----------------------------|---|
| Website                    | <a href="http://www.tskb.com.tr/en/about-us/tskb-contact-form">http://www.tskb.com.tr/en/about-us/tskb-contact-form</a> <a href="http://www.tskb.com.tr/tr/hakkimizda/tskb-iletisim-formu">http://www.tskb.com.tr/tr/hakkimizda/tskb-iletisim-formu</a> |
| E-mail address             | tgf@tskb.com.tr   |
| Phone number               | +90 0 212 334 50 50   |

| Maxis Communication Channel |   |
|-----------------------------|---|
| Website                     | <a href="https://www.maxisgs.com/iletisim.html">https://www.maxisgs.com/iletisim.html</a> |
| Phone number                | +90 0 (212) 283 51 13   |

TSKB manages complaints through an online contact form that includes a dedicated section for directing submissions to the relevant departments within the TSKB. Once a complaint is received, a “Customer Complaints Statement” is created in the TSKB’s system within two days. At the same time, the system notifies the pertinent department head to initiate the required actions. After the necessary review and assessment are completed, the final result is reached as promptly as possible. The Evaluation and Conclusion section of the Statement is completed by authorized staff, and a response is provided within 30 days of the initial submission. Throughout this process, the Board of Internal Auditors and the Internal Control Department oversee all stages. The Internal Control Department monitors and supports the departments responsible for implementing the procedure, while the Board of Internal Auditors ensures the overall effectiveness of complaint management. For grievances received by phone, TSKB personnel enter the information into the online form so the same procedure can be followed. The system also has the capability to compile data on the number of complaints, response times, and other metrics to evaluate TSKB’s performance.

**TSKB Workers’ Grievance Mechanism:** Employees may submit suggestions, express concerns or workplace grievances, and file complaints or lawsuits due to the administrative practices carried out by their managers or the workplace. TSKB offers an internal grievance system for its employees, which can be accessed anonymously and transparently. All relevant communication channels for submitting grievances or suggestions related to TSKB or working conditions are available on TSKB’s website. Submissions are reviewed and resolved by the Human Resources Department within 30 days, and employees are notified of the actions taken.

**Maxis Workers’ Grievance Mechanism:** Maxis follows a similar approach. The Grievance Committee, composed of the General Director, Deputy Director General, and Coordinator, oversees the process and is responsible for hearing, investigating, and resolving employee complaints, grievances, or conflicts. However, when a grievance related to the TGF is received, Maxis must notify TSKB immediately, as TSKB serves as the lead member of the Investment Committee. TSKB will then apply its own grievance-handling procedures to address the issue. Sapro and Lotus also will apply this grievance mechanism to ensure consistent handling and resolution of the grievances.

## **9.2 Governmental Grievance Mechanism- all stakeholders**

The public can raise any issues, complaints, and requests through the Presidential Communication Centre (CIMER). This center is an active 24-hour online national system developed by the Directorate of Communications to keep communication channels between the public and state open. The public may raise issues, complaints, and requests at anytime and anywhere. Issues, complaints, and requests can be both received and responded to through this national online system.

The CIMER system enables stakeholders to communicate directly with Sapro and Lotus during the Project lifespan. Still, a separate grievance mechanism system is established for the Project in which the stakeholders can receive their responses locally and communicate their complaints.

## **9.3 Internal Grievance Mechanism – for Workers**

There is an internal grievance mechanism for all employees, including both direct and subcontracted staff, to raise concerns regarding workplace conditions, policies, or practices that may affect them. The internal grievance mechanism of Sapro and Lotus is implemented in line with the principles of WB ESS2 and ESS10.

The mechanism ensures that grievances are addressed in a fair, respectful, and confidential manner. Issues may include, but are not limited to, internal communication breakdowns, misuse of authority, harassment, discrimination based on race, color, national origin, religion, age, sex, sexual orientation, gender identity, disability, or other protected characteristics.

Employees can submit grievances anonymously if they choose, and confidentiality is strictly maintained. Only personnel directly involved in resolving the grievance will be informed, and no personal information will be shared without explicit consent. Where appropriate, outcomes of anonymous grievances may be communicated via internal bulletin boards, team meetings, or other general staff communication channels, ensuring transparency without compromising anonymity.

A gender-sensitive approach is integrated into the mechanism to address Gender-Based Violence and Harassment (“GBVH”) throughout the Project lifecycle. All GBVH-related grievances are managed by nominated and trained staff, providing support to affected individuals and enabling anonymous submissions. This ensures that vulnerable groups, including GBVH survivors, have a structured, formal means to report complaints and receive timely, fair, and effective responses.

Employees have access to multiple grievance channels:

- **Grievance Boxes:** Secure, clearly marked boxes placed in accessible locations such as canteens, and site entrances.
- **Grievance Forms:** Standardized forms available near the grievance boxes and in common areas.
- **In-Person Submission:** Employees may submit grievances directly to workers’ representatives or designated personnel.
- **Email or Phone Submission:** Grievances can also be submitted through the internal grievance email address or phone line.

All grievances are logged, tracked, and addressed following a defined workflow, with reference numbers assigned for monitoring and follow-up. The mechanism is regularly communicated to all staff and reviewed for effectiveness.

The grievance management process includes the following steps:

- **Acknowledgment:** Within 3 business days of receipt.
- **Preliminary assessment / investigation:** Within 10 business days.
- **Resolution / response:** Within 30 business days, depending on complexity.
- **GBVH cases:** Prioritized, and support measures provided immediately; formal resolution may take longer depending on investigation, but updates should be provided regularly to the complainant.

All workers receive orientation on the grievance mechanism during onboarding and refresher training annually. Training includes information on submitting grievances, confidentiality procedures, GBVH awareness, and workers’ rights.

#### **9.4 External Grievance Mechanism – for communities**

The external grievance mechanism provides a formal channel for individuals and communities to raise concerns, complaints, or suggestions related to Sapro and Lotus’ operations, including environmental, social, and community impacts. The external grievance mechanism of Sapro and Lotus is implemented in line with the principles of WB ESS10.

It applies to all external stakeholders — such as neighboring communities, local authorities, suppliers, NGOs, and other interested parties — who may be directly or indirectly affected by the company's activities.

Sapro and Lotus ensures providing transparent and accessible channels for stakeholders to submit concerns, receive information, and obtain timely and fair resolutions.

Grievances can be submitted through the following channels:

- **Email:** Complaints can be submitted to *info@sapro.com.tr*.
- **Company Website:** An online communication form is available on Company website.
- **In Person:** Written submissions can be delivered to the site reception or security gate.
- **Phone:** Stakeholders may also contact Sapro and Lotus through the publicly available contact number listed on the website.

A designated person and department will be appointed to manage external stakeholder engagement and monitor SEP implementation, and their contact details will be disclosed.

Anonymous grievances are also accepted. In such cases, the responses and outcomes will be shared through general communication channels (e.g., notice boards at the site entrance) without disclosing personal information.

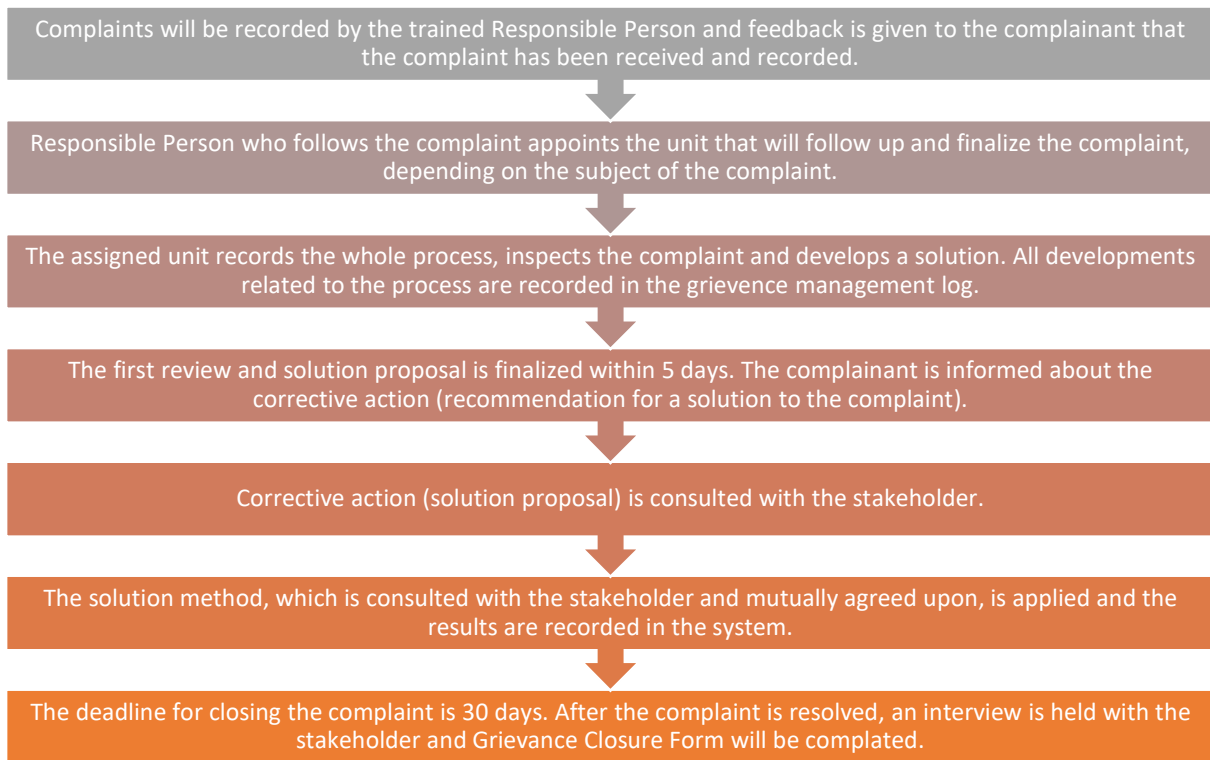
All grievances are recorded in a Grievance Register, maintained by the designated responsible staff. The process includes acknowledgment, assessment, investigation, and resolution of each submission in line with WB ESS10 principles.

The grievance management process includes the following steps:

- **Acknowledgment:** Within **5 working days** of receipt.
- **Assessment and Response:** Review and response provided within 30 days, depending on the nature of the issue.
- **Follow-up:** In cases requiring longer resolution times, the complainant is informed of progress.
- **Closure:** Once resolved, the case is formally closed, and a summary of the outcome is recorded.

Information on the grievance mechanism and available submission channels is communicated through Company website and other external communication tools to ensure that it is accessible and known to all external stakeholders.

The workflow of the grievance mechanism is shown in Figure 2.



**Figure 2: Grievance Management Workflow**

### **9.5 Receiving and Assessment of Anonymous Grievances**

If external or internal stakeholders are unable or unwilling to provide their contact details or identification, their submissions will be recorded and evaluated as anonymous grievances or anonymous suggestions. Stakeholders may submit their concerns confidentially through designated grievance boxes available at specific locations for external stakeholders or via the contact phone number published on Sapro and Lotus’s website.

All anonymous grievances are reviewed and assessed following the same steps outlined in the grievance management workflow. To protect confidentiality, no cameras are installed in areas where grievances can be submitted, ensuring full anonymity and preventing any disclosure of the complainant’s identity. Each anonymous submission is documented, reviewed, and investigated as appropriate, with all actions recorded in the grievance management system. Information related to confidential grievances will not be shared with third parties.

While formal feedback cannot be provided for anonymous submissions, issues of broader relevance or those requiring public awareness may be communicated through general channels such as noticeboards or other public information tools, when deemed appropriate.

## **10. Monitoring**

The monitoring activities will be carried out throughout the Project operation to assess the compliance of the SEP with the Project standards. If non-conformance with the Project standards is identified through monitoring, these will be investigated, and appropriate corrective actions will be identified.

The Project SEP will be reviewed annually and updated as needed to reflect Project developments and stakeholder feedback. Grievances will be recorded and collected monthly by the Human Resources (“HR”) Department, with quarterly reports submitted to the Management for prompt resolution. Summary reports of grievance records will be provided to Project Management on a quarterly basis. Quarterly summaries will be used for evaluation of:

- transparency and accessibility of the engagement process,
- provision of relevant information,
- timeliness of responses (ongoing communication), and
- applicability and relevance of the information provided.

A set of Key Performance Indicators (“KPIs”) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. Table 4 summarizes the KPIs and associated key monitoring actions that will be used to assess the progress and effectiveness of the SEP.

**Table 4: KPIs and Monitoring**

| ID   | KPI  | Target   | Monitoring Measure              |
|--|--|--|---------------------------------|
| <b>Consultation and Information Disclosure</b> |  |  |                                 |
| SEP-KPI-01                                     | Registration of stakeholder engagement activities  | Target of 100%   | Stakeholder Engagement Register |
| SEP-KPI-02                                     | Consultation records<br>Number of meetings held<br>Visits to local authorities or other local stakeholders<br>Number of newspapers to share Project information<br>Any updates on the Project website<br>Any type of announcements | Development of regular reports on the consultation activities      | Reporting                       |
| SEP-KPI-03                                     | Disclosure of Project’s E&S documents  | Disclosure of documents on an annual basis                         | Company Website                 |
| <b>Implementation of Grievance Mechanism</b>   |  |  |                                 |
| SEP-KPI-04                                     | Number of grievances received from internal and external stakeholders  | The total number reduced per year                                  | Grievance Log / Database        |
| SEP-KPI-05                                     | Number of grievances responded to within targeted time frame   | The target of 100%   | Grievance Log / Database        |
| SEP-KPI-06                                     | Reporting of grievance records summaries   | Quarterly  | Reporting                       |
| SEP-KPI-07                                     | Reporting back to stakeholders in the implementation of the grievance mechanism  | Delivery of regular reports to stakeholders on the outcomes of the | Reporting                       |

| ID         | KPI  | Target  | Monitoring Measure |
|------------|--|---|--------------------|
|            |  | grievance mechanism   |                    |
| SEP-KPI-08 | Auditing the SEP and grievance mechanism to ensure that they are being implemented and that grievances are being adequately addressed. | Target of 100% of grievances closed out to the satisfaction of complainant within the targeted time frame | Annual Review      |

**11. Reporting**

The Project will ensure transparent and regular communication regarding stakeholder engagement activities and the status of grievances received and resolved. Reporting will be conducted as follows:

**Internal reporting**

The HR Department will prepare periodic internal reports summarizing stakeholder engagement activities, key issues raised, grievances received, response timelines, and closure status. These reports will be shared with the Project Management team to support decision-making and continuous improvement.

**External reporting**

A summary of stakeholder engagement activities, including grievance mechanism performance (number of grievances received, resolved, or pending), will be disclosed to external stakeholders through publicly accessible channels (e.g., Company website). All disclosures will follow confidentiality and data protection requirements—no personal information of grievance submitters will be shared.

**Annual SEP review reporting and update**

Key stakeholder engagement outcomes and lessons learned will be reflected in the annual review of the SEP. If required, the SEP will be updated to incorporate improvements to engagement processes and the grievance mechanism.

**12. Training**

All relevant workers of the Project and contractors’ workers will receive induction training, which will include general awareness-raising on environmental and social requirements. As part of this induction, all workers will be informed about the Project’s SEP and Grievance Mechanism, including how to submit grievances and confidentiality.

Periodic annual training on Ethical Standards, the Code of Conduct and GBVH will be conducted for all employees, including subcontractors and temporary personnel, to reinforce awareness, prevention measures, and reporting channels.

The need for refresher training on the SEP and the Grievance Mechanism will be periodically assessed by the HR Department and repeated as necessary to ensure continued awareness and effective implementation. To ensure continued awareness and effective implementation, refresher training on the SEP and the Grievance Mechanism will be provided at least annually, or more frequently if required (e.g., based on workforce turnover or updates to procedures).

### 13. Evaluation and Audit

Grievances will be recorded and collected monthly, with quarterly summary reports submitted to the Management for prompt resolution. Quarterly summaries will be used to assess both the number and nature of complaints/grievances (if any), along with the Project’s ability to address grievances in a timely and effective manner.

For transparency and effective stakeholder engagement, the Project will disclose the Project SEP at the Company website. Additionally, grievance mechanism summary reports will be ready to share upon request, detailing how stakeholder grievances are received, addressed, and resolved, ensuring accountability and trust throughout the Project lifecycle.

Sapro and Lotus will internally monitor compliance with this SEP in accordance with its requirements. Periodic assessments will be conducted to ensure adherence to the plan, including auditing the grievance mechanism to confirm its proper implementation and effective resolution of grievances. The annual assessment report of the SEP and GM will serve as official audit reports.

Records will be kept on the following subjects:

- 1) Consultation meetings.
- 2) Stakeholder engagement activities.
- 3) Grievances raised and actions taken to close them
- 4) Opinions/suggestions/comments raised by all stakeholders during stakeholder engagement activities
- 5) Press releases and interviews.
- 6) Records of audits, inspections and incidents.

Reporting requirements are presented in Table 5.

**Table 5: Reporting & Monitoring Time Frame**

| Monitoring Type        | Frequency | For                                    | Content  |
|------------------------|-----------|--|--|
| Reporting              | Quarterly | Company management                     | Detailed records of all stakeholder engagement activities, number of participants attended the meetings, number and type of the grievances raised, timeline for the resolution of each grievance |
| Reporting              | Annually  | Company management / Local communities | Statistics of the records of the activities, timeline for the resolution of each grievance   |
| Performance Monitoring | Annually  | Company management                     | Summarizing progress against determined KPIs, summary schedule of grievance status, workforce analyses, minutes of consultations/meetings  |

## 14. Roles and Responsibilities

Sapro and Lotus have an overall responsibility in relation to implementation of the SEP. The following roles and responsibilities will be implemented during Project operations. The roles and responsibilities will be updated where relevant.

**Table 6: Roles and Responsibilities**

| Role   | Detailed Responsibilities   |
|--|---|
| General Manager  | <ul style="list-style-type: none"> <li>• Approval of this SEP and resources required for implementation.</li> <li>• Ensures adequate resources are provided for implementation of this SEP.</li> <li>• Overall, responsible for ensuring the implementation of all environmental and social management plans.</li> <li>• Assists the Project Team when required.</li> </ul>   |
| Directors / Department Managers (e.g., Production, Quality, HR, Finance, R&D, Purchasing & Supply Chain) | <ul style="list-style-type: none"> <li>• Ensure SEP requirements are integrated into their department’s daily operations.</li> <li>• Assigns departmental focal points responsible for implementing SEP-related tasks.</li> <li>• Ensure that required resources (employees, equipment, documentation) are provided to fulfil stakeholder engagement and grievance mechanism obligations.</li> <li>• Support the grievance resolution process when grievances relate to department responsibilities.</li> </ul>   |
| Project Manager  | <ul style="list-style-type: none"> <li>• Ensures implementation of SEP and grievance mechanism.</li> <li>• Conducts routine inspections of SEP implementation and monitors effectiveness of measures.</li> <li>• Records non-compliances and ensures corrective actions are implemented.</li> <li>• Ensures grievance channels are visibly announced and accessible for workers.</li> <li>• Supports resolution of grievances requiring Project-level action.</li> </ul>  |
| HR Manager   | <ul style="list-style-type: none"> <li>• Manages the internal worker grievance mechanism, including GBVH-sensitive handling.</li> <li>• Ensures confidentiality of grievances and adherence to non-retaliation principles.</li> <li>• Ensures information about the grievance mechanism is communicated during onboarding and refresher training.</li> <li>• Monitors grievance mechanism performance indicators and provides related reporting.</li> <li>• Ensures annual refresher training on SEP and grievance mechanisms is conducted.</li> </ul>  |
| Designated Personnel for Stakeholder Engagement  | <ul style="list-style-type: none"> <li>• Maintains continuous communication with internal/external stakeholders and updates stakeholder list as needed.</li> <li>• Manages external grievance mechanism and ensures accessibility for external stakeholders.</li> <li>• Logs all grievances into the grievance registry and ensures resolution within defined timelines.</li> <li>• Coordinates with relevant departments to support grievance resolution.</li> <li>• Ensures SEP is regularly updated and reports to Company Management.</li> <li>• Prepares periodic engagement and grievance mechanism reports.</li> </ul> |
| Contractors (Project Managers, EHS Managers, Supervisors)  | <ul style="list-style-type: none"> <li>• Develop internal procedures consistent with SEP requirements.</li> <li>• Ensure worker and community grievances are recorded and addressed.</li> <li>• Deliver required training to their workers and maintain training records.</li> <li>• Report SEP implementation status to Sapro and Lotus’ responsible personnel periodically.</li> </ul>  |

| <b>Role</b>                            | <b>Detailed Responsibilities</b>   |
|--|--|
| All employees (direct and/or indirect) | <ul style="list-style-type: none"><li>• Participate in the training.</li><li>• Ensure compliance with management measures.</li></ul> |

### 15. Liabilities

Company website: <https://www.sapro.com.tr/tr>


Project Site: Ortaköy Mah. İltar Bulvarı No: 27 34592 Silivri, İstanbul / Türkiye

Company Phone Number: +90 212 734 38 08

e-mail: info@sapro.com.tr



**APPENDIX B - Sample Internal Grievance Form**

|   |  |  |   |
|---|--|--|---|
|            |  |  |   |
| <b>Sapro</b><br>Sapro Cleaning Products Industry and Trade Inc.                             |  |  |   |
| <b>DOCUMENT NAME</b>  | <b>SCOPE</b>                               | <b>PROCESS OWNER</b>                         |   |
| Request, Complaint, and Suggestion Form   | All Staff                                  | Human Resources Manager                      |   |
| Document No: F-311.15   | Revision No: 01                            | Revision Date: 25 September 2023             |   |
|   |  | Publication Date: 02.01.2020                 |   |
| <b>FORM NO:</b>   |  |  |   |
| <b>CATEGORY</b>   | <b>REQUEST</b><br><input type="checkbox"/> | <b>COMPLAINT</b><br><input type="checkbox"/> | <b>SUGGESTION</b><br><input type="checkbox"/> |
| <b>NAME OF THE PERSON FILLING OUT THE FORM</b>  |  |  |   |
| <b>FORM COMPLETED BY DEPARTMENT</b>   |  |  |   |
| <b>TYPE OF REQUEST/COMPLAINT/SUGGESTION</b> (Please explain next to the relevant item.)     |  |  |   |
| <input type="checkbox"/>  | <b>INFRASTRUCTURE</b>                      |  |   |
| <input type="checkbox"/>  | <b>PERSONAL RELATIONSHIPS</b>              |  |   |
| <input type="checkbox"/>  | <b>OTHER</b><br>(Security Breach)          |  |   |
| <b>RECEIVER INFORMATION</b> (To be completed by Human Resources only.)                      |  |  |   |
| <b>NAME</b>   |  |  |   |
| <b>DATE OF RECEIPT</b>  |  |  |   |
| <b>EVALUATION RESULT</b> (To be completed by Human Resources only.)                         |  |  |   |
|   |  |  |   |
| <b>WAS THE RELEVANT STAFF INFORMED? Yes / No</b> (To be completed by Human Resources only.) |  |  |   |
|   |  |  |   |
| <b>FORM CLOSING DATE</b>  | <b>APPROVED BY</b>                         |  |   |
|   |  |  |   |

**APPEDIX C - Sample External Grievance Form**



Sapro Cleaning Products Industry and Trade Inc.

| DOCUMENT NAME                           | SCOPE                 | PROCESS OWNER       |
|---|-----------------------|---------------------|
| Request, Complaint, and Suggestion Form | External Stakeholders | -                   |
| Document No: -                          | Revision No: -        | Revision Date: -    |
|   |                       | Publication Date: - |

**FORM NO:**

| CATEGORY  | REQUEST                  | COMPLAINT                | SUGGESTION               |
|---|--------------------------|--------------------------|--------------------------|
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| NAME / ORGANIZATION<br>(OR ANONYMOUS)   |                          |                          |                          |
| CONTACT INFORMATION<br>(Phone / Email / Address)                                  |                          |                          |                          |
| TYPE OF REQUEST/COMPLAINT/SUGGESTION (Please explain next to the relevant item.)  |                          |                          |                          |
| <input type="checkbox"/> ENVIRONMENT  |                          |                          |                          |
| <input type="checkbox"/> EMPLOYMENT   |                          |                          |                          |
| <input type="checkbox"/> OTHER<br>(Security Breach)                               |                          |                          |                          |
| RECEIVER INFORMATION (To be completed by the relevant department only.)           |                          |                          |                          |
| NAME  |                          |                          |                          |
| DATE OF RECEIPT   |                          |                          |                          |
| EVALUATION RESULT (To be completed by the relevant department only.)              |                          |                          |                          |
|   |                          |                          |                          |
| WAS THE STAKEHOLDER INFORMED? Yes / No (To be completed by Human Resources only.) |                          |                          |                          |
|   |                          |                          |                          |
| FORM CLOSING DATE   |                          | APPROVED BY              |                          |
|   |                          |                          |                          |



