

SAKARYA GAS FIELD DEVELOPMENT PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

2023





Revision Tracking

REVISION TRACKING TABLE		
Rev. N°	Modification Description	Modified Page No.

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ABBREVIATIONS AND DEFINITIONS

BOTAŞ	Petroleum Pipeline Company
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPs	Equator Principles
ESMS	Environmental and Social Management System
GBV-SEAH	Gender Based Violence, sexual exploitation, abuse, and harassment
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
H&S	Health and Safety
IFC	International Finance Cooperation
IFIs	International Finance Institutions
PPM	Public Participation Meetings
PR	Performance Requirement
PS	Performance Standard
SEP	Stakeholder Engagement Plan
TPAO	Turkish Petroleum Company
TP-OTC	Turkish Petroleum Offshore Technology Centre



Environmental and Social Impact Assessment: The Social and Environmental Impact Assessment (S&EA) process is a way to identify, predict and assess the type and scale of potential E&S impacts, and opportunities to benefit conservation associated with any business activities or projects.

Grievance Mechanism: This Good Practice Note defines 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 organisations 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 organisations 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 is an umbrella term encompassing a range of activities and interactions over the life of a Project, including the Stakeholder Identification and Analysis, Information Disclosure, Stakeholder Consultation, Negotiation and Partnerships, Grievance Management, Stakeholder Involvement in Project Monitoring, Reporting to Stakeholder and Management Functions.

Vulnerable People: Vulnerability status may stem from an individual’s or group’s race, colour, 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.

1.0 INTRODUCTION

1.1 Project Overview

Sakarya Gas Field Development Project (Project) is planned by Turkish Petroleum Corporation (TPAO or Project Owner) to extract, transport to shore and process the natural gas, discovered in the Sakarya Gas Field, in the exclusive economic zone of Turkey, off the Western Black Sea Region, and the natural gas reserves to be discovered through the ongoing exploration. Turkish Petroleum Offshore Technology Center (TP-OTC or Project Executor), 100% owned by TPAO will be conducting Project Management and Engineering, Procurement, Construction and Installation (EPCI) for the Project. Unless otherwise stated, SGFD Project refers to the Phase 1 of the investment. SGFD Phase 1 is the topic of this ESIA.

The Project consists of three main units, including the subsea production facility in Sakarya Gas Field, in the exclusive economic zone of Turkey, onshore processing facility (OPF) in Filyos Industrial Zone in the Çaycuma district of Zonguldak province, , and two offshore pipelines for gas transportation from field to OPF and Mono-ethylene glycol (MEG) transportation from OPF to field, and an umbilical, all including shore crossings.

The Project investment will be realized in two phases, Phase 1 and Phase 2:

- Under **Phase 1**, natural gas to be produced with the subsea production system from 10 wells in Sakarya Gas Field will be transported onshore through a 16-inch (40.64 cm) diameter steel pipeline, processed at the onshore processing facility. In Phase 1, the daily production capacity will reach a maximum of 10 million standard m³.
- Under **Phase 2**, the natural gas whose production will continue in Sakarya Gas Field will be connected to the subsea production system with 30 additional wells, reaching a total of up to 40 wells under Phase 2. A 24 inches pipeline (60.96 cm) or above will be needed to transport the additional gas produced in Phase 2.

Once processed at the onshore processing facility (OPF), the gas produced by the Sakarya Gas Field will be measured at a Fiscal Metering Station (FMS) and offloaded to the national grid via a ~36 km onshore pipeline. Both the FMS and the natural gas pipeline (“the Project”) will be designed, constructed, and operated by Petroleum Pipeline Company (“BOTAS”). and, in line with the OECD (Organisation for Economic Co-operation and Development) and IFC Performance Standards definition, will be considered as Associated facilities to the main Project.

The present document deals with the Phase 1 of the Project, whose description is included in Chapter 3.0 of the document. Because of the limited control by TP-OTC over the two BOTAS project’s components and considering that some construction works have already begun at the time of this document, it has been agreed among all parties involved to address the FMS and the onshore pipeline section in a High-level E&S Assessment Report included in Appendix A of this ESIA Report. Details of the approach undertaken are included in Chapter 3.1.1.2 Project Associated Facilities.

TP-OTC had a national Environmental Impact Assessment (EIA) prepared for the Phase 1 of the Project per the requirements of Turkish EIA Regulation. After the disclosure process, EIA Positive Decision was secured from the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on Nov 26th, 2021. TP-OTC is considering receiving a loan from Export Credit Agencies (ECAs) or International Finance Institutions (IFIs) for purchase of Phase 1 Subsea Umbilical, Risers and Flow Lines (SURF).

A Gap Analysis Study, previously prepared by Golder Associates Turkey Ltd. (Golder) in December 2021, has identified gaps in the existing national EIA Report and included actions that need to be undertaken in order to

close these gaps and reach a full Environmental and Social Impact Assessment (ESIA) compliant with the relevant International Standards (Equator Principles IV, World Bank Environmental and Social Framework and Environmental and Social Standards, IFC Performance Standards and Guidelines, and Good International Industrial Practice - GIIP).

Golder was retained by TP-OTC as a consultant to carry out an ESIA according to the findings of the Gap Analysis Study and further review of the Project design.

The potential lenders require the Project environmental and social information to be disclosed to stakeholders and this information is referred to as the disclosure package, which demonstrates Project's compliance with the lenders' requirements.

1.2 Project Location and Surrounding Settlements

The onshore facilities of the Project will be located in Çaycuma District of Zonguldak Province, 25 km from Zonguldak centre and 15 km from Çaycuma district centre beeline. The nearest settlement to the OPF site is Sazköy village which is located approximately 300 meters east.

OPF is bounded by:

- North: Black Sea
- Northeast: Coastal Logistics Centre
- East: Sazköy Village (300 m)
- West: Filyos River and Filyos Industrial Zone (under construction)
- South: Derecikören Village (1400 m), Gökçeler Village (1400m)
- Southeast: Aşağıhsaniye Village (1300m)

The settlements around the onshore processing plant are shown in Figure 2. The closest settlement to the Project area is Sazköy, located about 300 meters away. This is followed by Aşağıhsaniye with 1300 meters, Derecikören and Gökçeler with 1400 meters and Yeşilyayla with 2800 meters. Access routes are available for land access to the Project area. Filyos Port adjacent to the onshore processing plant will be used to meet the needs of sea supply.

The nearest settlements to the Project site are shown in below Figure 1-1 and the Project components including the associated facilities are presented in below Figure 1-2.

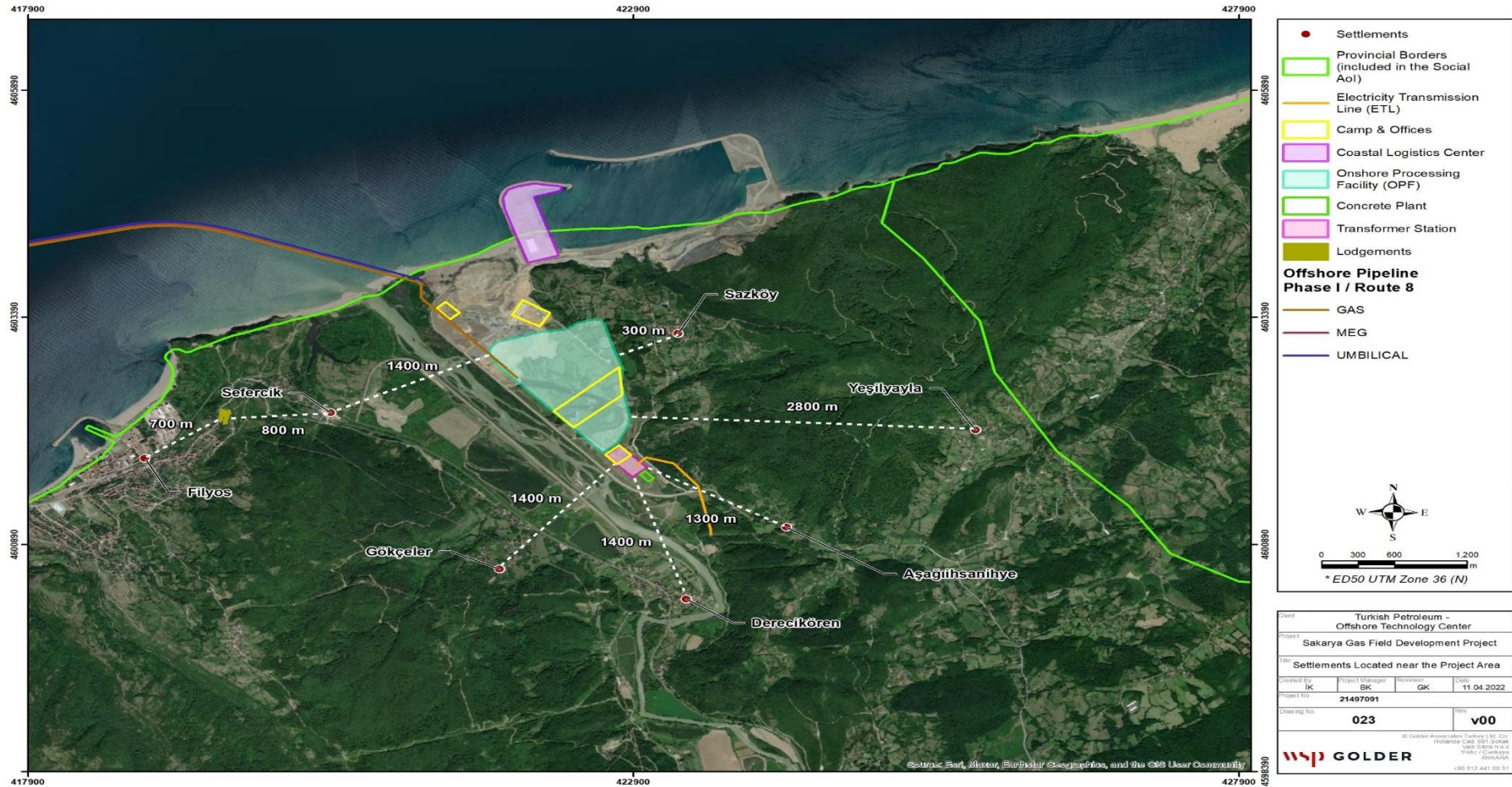


Figure 1-1 Nearest Settlements Map to the Project

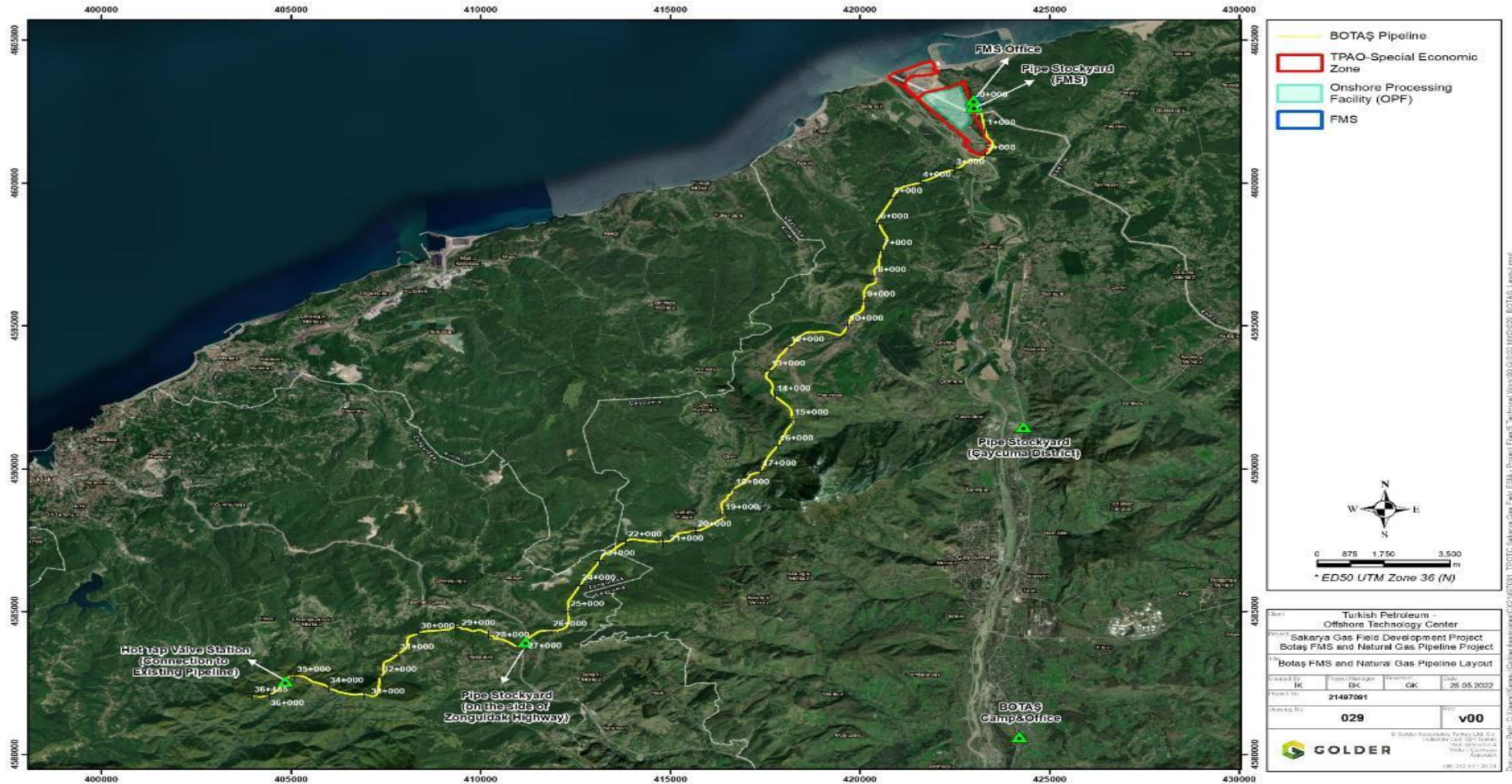


Figure 1-2 Satellite Image Showing Project Components

The ownership status of the onshore areas of the Project is summarized below:

- The industrial zone area, where the OPF (including transformer station) will be constructed, is owned by the treasury and assigned to Turkish Ministry of Industry and Technology. Upon assent of Turkish Ministry of Industry and Technology, the pre-easement of this land was granted to TPAO. After EIA Positive Decision was obtained, right of easement was granted by General Directorate of National Real Estate to TPAO for 49 years for the Project, with the consent of Ministry of Industry and Technology. With the Presidential Decree No. 5071 published in the Official Gazette dated 6 January 2022, this area was removed from the Filyos Industrial Zone area and allocated to TPAO as a special economic zone. Previous and current status of the land is illustrated in Figure 3 9.
- The area between the shoreline and OPF, where the SURF passes through, is partly in the industrial zone and partly in the area where the right of easement was given in favour of the Ministry of Transport and Infrastructure and the use of land in the zoning plans was determined as a coastal logistics center. With the Presidential Decree No. 5071 published in the Official Gazette dated 6 January 2022, the part of the area (industrial zone) was allocated to TPAO as an individual investment site and consent/easement was made with the Ministry of Transport and Infrastructure for the other part.
- Energy transmission line passes through forest land which belongs to treasury except 1 private agricultural land. Agricultural land will be expropriated, and non-agricultural land use permit will be obtained from the Provincial Directorate of Agriculture and Forestry if required. Forest land will be allocated after the permission to be obtained from the Provincial Directorate of Agriculture and Forestry.
- Temporary camp site of Kolin is located in the land allocated to Ministry of Transport and Infrastructure for the Port construction and camp site of Subsea7 is located within the land of which preliminary consent/easement was made with the Ministry of Transport and Infrastructure while Schlumberger camp site is located inside OPF boundaries that is allocated to TPAO as a special economic zone.
- In addition, lodgings are planned on an area of 2 hectares, approximately 1.8 km west of the Project area, to be used in the construction and subsequent phases of the Project. TPAO purchased the title deed from the Ministry of National Defence.

1.3 Stakeholder Engagement Objectives

Stakeholder engagement is a key element in building strong, constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts. It aims to inform stakeholders about the potential environmental and social impacts related to the project through appropriate disclosure of information, to ensure their perceptions of the proposed development are as accurate as possible, to consult with them to obtain feedback, and to provide a mechanism for resolving any concerns or complaints they might have.

Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders;
- generate a good understanding of the Project among those that will likely to be affected;
- identify issues early in the Project cycle that may pose risks to the Project or its stakeholders;
- ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
- establish a system for long-term and mutual communication between the Project and stakeholders that is of benefit to all parties.

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The Stakeholder Engagement Plan (SEP) is a guiding document that maps the main categories of stakeholders who will be meaningfully engaged within the development and implementation of a project. This SEP highlights the way the company plans to communicate with relevant stakeholder groups who may be affected by or interested in Project activities.

The main purposes of this document are to:

- define a consultation approach as well as activity and implementation framework for engagement of stakeholders in relation to construction and operation;
- identify resources and responsibilities for implementation and monitoring of the engagement program; and
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The approach presented in this SEP builds on public engagement provisions of Turkish legislation and international good practice/guidance. It outlines the Company's commitments and strategy in terms of engaging stakeholders during Project pre-construction, construction, and operation phases.

The SEP is a 'living document' which will be progressively developed through updated versions in line with the phases of the Project. The SEP will be made publicly available at the communities in the Project area of influence in Turkish and will be disclosed on TPAO website both in English and Turkish and will also be made accessible to local communities.

2.0 LEGISLATIVE REQUIREMENTS AND APPLICABLE STANDARDS

2.1 Turkish Requirements for Stakeholder Engagement and Public Consultation

2.1.1 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.

2.1.2 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 organisations, 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.

IV. Expropriation Law

Another law related to the involvement of stakeholders in the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason, and the subject of the action.

VI. Environmental Law

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 (EIA) are defined by the Turkish EIA Regulation (29.07.2022, OG No. 31907).

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The projects requiring an EIA Report and 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 29th, 2022.

According to the Turkish Republic Ministry of Environment, Urbanisation and Climate Change (MoEUCC) EIA Regulation (Official Gazette July. 29, 2022; No: 31907), relevant requirements related to the EIA process have been disclosed to the public.

Project's status according to Environmental Impact Assessment Regulation:

TP-OTC had a national Environmental Impact Assessment (EIA) prepared for the Phase 1 of the Project per the requirements of Turkish EIA Regulation. After the disclosure process, EIA Positive Decision was secured from the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on Nov 26th, 2021.

2.2 International Standards

TPAO has committed to developing the Project in line with Good International Industry Practice (GIIP), and specifically the Equator Principles IV, and the International Finance Corporation's (IFC) Performance Standards (PS) The requirements of these standards in terms of stakeholder engagement are briefly provided in the sections below.

2.2.1 The Equator Principles

The EP IV, published in 2020, is a risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects and is primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk decision-making. The EPs have greatly increased the attention and focus on social/community standards and responsibility, including robust standards for indigenous peoples, labour standards, and consultation with locally affected communities within the Project Finance market. They have also promoted convergence around common environmental and social standards.

In relation to stakeholder engagement clients are required to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers and, where relevant, Other Stakeholders. According to EPs the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: i) the risks and impacts of the Project; ii) the Project's phase of development; iii) the language preferences of the Affected Communities; iv) their decision-making processes; and v) the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion, and intimidation. Principle also requires that clients take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. Disclosure of environmental or social risks and adverse impacts should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.

2.2.2 International Finance Corporation:

IFC's Environmental and Social Performance Standards (published in 2012) define IFC clients' responsibilities for managing their environmental and social risks. PS applies to all investment and advisory clients whose projects go through IFC's initial credit review process. There are 8 performance areas covering risk management, labour issues, resource efficiency, communities, land acquisition, biodiversity, indigenous people, and cultural heritage. In relation to stakeholder engagement, PS 1, Assessment and Management of Environmental and Social Risks and Impacts require that:

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- Stakeholders that may be interested in the Project are identified;
- Affected communities are appropriately engaged on issues that could potentially affect them;
- A Stakeholder Engagement Plan is implemented that is scaled to the project risks and impacts and development stage and be tailored to the characteristics and interests of the Affected Communities.
- Disclosure of relevant project information to help Affected Communities and other stakeholders to understand the risks, impacts and opportunities of the project.
- A process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and which allows the client to consider and respond to them.
- An appropriate grievance mechanism to address and resolve grievances effectively.

3.0 STAKEHOLDER IDENTIFICATION AND MAPPING

3.1 Stakeholder Identification

This-section describes the various categories of identified stakeholders. Identifying stakeholders is a key step in the management of the overall stakeholder engagement process. The list and register of stakeholders will be reviewed and/or updated as the Project progresses. Stakeholders may be external or internal to TPAO & TP-OTC and may be defined as individuals or groups who are:

- Directly or indirectly affected by the Project,
- Interested in the Project and its activities,
- Able to influence the Project and the expected results

The stakeholder's identification process started at early Project preparation stages and was performed by TPAO & TP-OTC employees and Project consultants during direct meetings with authorities, key stakeholders, and representatives of local community. The stakeholders were identified:

- During the review of the socio-economic status of the Project area and meetings on the field;
- Via direct meetings with the TPAO & TP-OTC teams;
- Based on the available documentation and research of desktop information;
- Based on the observation notes made during the site visits; and
- Based on previous experience with similar gas projects and on local knowledge.

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

The key stakeholders include;

- International (e.g. investors, IFIs).
- Government (e.g. the Republic of Turkey, relevant ministries, municipalities, and other relevant local authorities).

- Non-governmental organizations.
- Goods and services suppliers, contractors.
- Clients.
- Education and training institutions (e.g. Universities, colleges).
- Industrial sector (e.g. construction and infrastructure trade bodies).
- Internal stakeholders (e.g. Employees, employee representatives, trade unions).
- Local Communities (e.g. affected settlements, local community groups).
- Media.

Based on this, the following list presents the key primary and secondary stakeholders identified for the Project.

Table 3-1: Identified Stakeholders

Primary Stakeholder
• National Authorities
• Regional /Local Public Authorities (LPAs)
<ul style="list-style-type: none"> • Affected Communities: <ul style="list-style-type: none"> • Residents living in close proximity to Project area: Filyos, Saltukova villages and neighbourhoods • Local government and community representatives, local leaders, i.e. mukhtars and other community leaders/representatives. • Women, children, elderly people, and any other vulnerable people who live in the Project affected villages • General Public (including residents of, and visitors to, the Local Communities) • Community services and Infrastructure organizations. • Businesses in Filyos, Çaycuma and Saltukova villages • Agricultural and Animal Husbandry Enterprises in Filyos and in Villages close to Project area. • Fisheries and Fishery organizations representing those who perform fishing activities in the Project area. • Land users for agricultural and animal husbandry purposes in the proximity of the Project area. • Tourists using Filyos beach
Secondary Stakeholder
• Employees of the Project
• Other businesses in the region
• Non-governmental organizations (NGOs)
• Media
• Academic and research organizations

Note: The list will be updated, and new stakeholders will be added in the list as the Project progresses.

3.2 Stakeholder Mapping and Analysis

Mapping (classifying) stakeholders is an on-going process throughout the life of the Project, with some parties being identified in the initial phase of the implementation, while others are added as they become interested in the Project. The table below provides the outcomes of the mapping and analysis activity performed; for the most relevant stakeholder categories previously identified, the table provides an indication of the impact that the Project can generate on the stakeholder and the potential expectations, opinions and key concerns of the stakeholder.

Table 3-2 Stakeholder Analysis

Type	Stakeholders	Affected		Interested/ influenced
		Direct	Indirect	
Internal Stakeholders				
Project Investor	TPAO	X		
Project Owner	TP-OTC	X		
Contactors	Main Contractor	Scope of Work	X	
	OneSubsea (EPCI)	SPS Equipment and Tooling: project management, procurement, fabrication, logistics, delivery		
	Schlumberger (EPCI)	Well Completion Equipment and Chemicals: project management, procurement, fabrication, logistics, delivery		
	Subsea7 (EPCI)	Pipelines and Umbilical: project management, procurement, fabrication, logistics, delivery, seabed interventions, installations (pipelines, umbilical and SPS system components), pre-commissioning and commissioning support		
	Schlumberger (EPCI)	OPF construction: project management, procurement, fabrication, logistics, delivery, construction, commissioning, 3-years operation and maintenance		
	Kolin (EPCI)	Soil improvement works		

	Güngör Elektrik (Direct Contractor)	Transformer station and energy transmission line construction: land acquisition of energy transmission line, commissioning, 3-years operation and maintenance of transformer station			
Employees	All direct and indirect Project Employees		X		
External Stakeholders					
International bodies and organizations	Lenders, potential lenders				X
National Governmental Authorities	Ministry of Energy and Natural Resources Ministry of Environment, Urbanization and Climate Change Ministry of Agriculture and Forestry Ministry of Labour and Social Security Ministry of Family and Social Services Ministry of Treasury and Finance Minister of Industry and Technology Ministry of Culture and Tourism Ministry of Forestry and Water Affairs Ministry of Interior Ministry of National Defence General Directorate for Highways Turkish Armed Forces				X
Regional/Local Authorities	Zonguldak Governorship Çaycuma District Governorate Zonguldak provincial directorates of central government institutions Çaycuma district directorates of central government institutions		X		

	<p>BAKKA(West Black Sea Development Agency) Zonguldak Municipality Balıkesir Municipality Çaycuma, Saltukova, district municipalities Filyos sub-district municipality Mukhtars of the affected settlements (villages and neighbourhoods)</p>			
National and Local NGOs and organizations	<p>Chambers of Commerce and Industry City Councils Nature Association Social Aid and Solidarity Promotion Fund TEMA Turkish Association of Mukhtars Union of Chambers and Commodity Exchanges of Türkiye (TOBB) Union of Chambers of Merchants and Artisans Union Chambers of Turkish Engineers and Architects (TMMOB) WWF Türkiye Women-specific associations İŞKUR</p>			X
Education and training institutions	<p>Zonguldak Bülent Ecevit University Bartın University</p>			X
Social services	<p>Zonguldak State Hospital Çaycuma State Hospital</p>		X	

PAPs	Affected settlements, Local community members Mukhtars Vulnerable groups Landowners Formal Land Users Informal Land Users Local Businesses	By Project	By BOTAŞ	X	
		Sazköy Gökçeler Aşağıİhsaniye Derecikören Yeşilyayla Sefercik	Aşağı İhsaniye Çayır Derecikören Esentepe Esenyurt Gökçeler Güdüllü Sazköy Temenler Yukarıgöynük Elvanpazarcık/Elvan Elvanpazarcık/Merkez Gerdek (Himmetoğlu) Kabalakli Osmanli Sapça Sofular		
Media		Pusula Gazetesi - Online Newspaper İnanış Gazetesi - Newspaper Halkın Sesi Gazetesi - Newspaper AA Zonguldak - Newspaper Demokrat Çaycuma Gazetesi - Newspaper Çaycuma Express - Newspaper Devrek Postası - Newspaper Bartın Pusula Gazetesi - Newspaper Bartın Olay TV – Television Channel Aba Medya - Newspaper and Television Channel Elmas TV – Television Channel Kanal Z – Television Channel			X

4.0 STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

4.1 Engagement Activities Conducted by TPAO

Meetings with stakeholders and potential stakeholders were carried out as the part of the Project preparation phase. The purpose of the meetings was to provide information on the Project to key stakeholders and affected communities and gathering their feedback on the Project. Prior to public participation meeting held during the EIA, briefing meetings with local authorities were held by general manager of TPAO.

Stakeholder engagement activities within the scope of the project started in 2021 and until December 2022, total of 569 engagement activities were held with various stakeholders and all engagements were recorded to log indicating Date, Minutes, TP-OTC Representatives, Location, Name of individual(s), Position in community (if relevant), Stakeholder Classification, Number of participants, Gender, Main subject of discussion, Type of meeting, subject of discussion, issues, Actions required and Comments.

4.2 Engagement Activities During the national EIA

Engagement activities for the Project were initiated with a Public Participation Meeting (PPM) held on March 16th, 2021. The PPM provided opportunity to the affected local residents to be informed about the Project and to express their opinions and concerns. The purpose of this meeting and how it was organized have been determined in the "Environmental Impact Assessment Regulation" which is published in the Official Gazette dated 25.11.2014 and numbered 29186 by the Ministry of Environment and Urbanization. An announcement by ARMADA was published in the local newspapers (Çaycuma Ekspres, Demokrat Çaycuma and Compass Newspaper published in Zonguldak) in the region where the Project will be carried out, and in Dünya Newspaper nationally as of 05.03.2021. Due to the Covid-19 precautions, "100" people were allowed to attend the meeting as per the pandemic regulations, which allowed one participant per six square meters. The Public Participation Meeting was held at the Filyos Municipality Wedding Hall (which was the biggest hall available as closest to Filyos), approved by the Ministry of Environment and Urbanization, at 13:30, with the participation of ARMADA, the company that prepared the EIA report, and a team from Turkey Petroleum A.O as the Project owner. The meeting was held under the chairmanship of the Zonguldak Provincial Director of Environment and Urbanization. Approximately 60 people were attended to PPM including national EIA consultant of the Project, TPAO representatives, Ministry representatives, local communities and the Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA).



Figure 4-1 Photograph from PPM



Figure 4-2: Photograph from Briefing Meeting

Questions of the participants and the main concerns and expectations are given in the below bullets.

- Has alternative analysis conducted for the Project?
- Cancellation decisions were taken regarding the Environmental Plan of the Province, did you consider he determinations in the official expert reports prepared by the courts been observed in these cases?
- While there are endemic plants with botanical features at the mouth of Filyos Stream, this area is also a bird watching point. Will sensitivity towards these areas be observed and how will this be monitored?
- Are the sensitivities regarding the nature monument of Filyos bird sanctuary area and the ruins of the ancient city of Tios, located to the west of Filyos Stream, taken into consideration? How are the effects calculated on these areas in the constructions to be made in the sea area? What kind of measures will be taken?



- Çaycuma and Filyos are settlements with a high percentage of people who make a living from fishing, has a method been developed to prevent impact on fishing activities? What will be the effect of the facility?
- Has the effect of the facility to be established on Ramsar areas been measured? Has any method been developed to prevent it from being adversely affected during the construction period?
- It is known that Zonguldak province maintains its feature of being a hot spot as a result of the studies carried out within the scope of the Black Sea Convention against pollution. Has a method been developed to prevent pollution, especially on the sea side?
- Have detailed geological and geotechnical studies been carried out? Has disaster risk management been improved?
- How will employment expectations of the communities meet?
- Will the Project contribute the education of the communities for the employment opportunities?
- Will there be further expropriation? How the Project effect the agricultural activities?

4.3 Engagement Activities during ESIA

Community Level Surveys (CLS)

The aim of this survey was to gather socio-economic information about each of the settlements in the Area of Influence. Topics included population, migration, ethnic composition, age distribution, social facilities and infrastructure, education, social conflict and ills, social cohesion, livelihoods, income generating activities, and land use. The community level survey was filled out by the mukhtar of each of the settlements included in the area of influence. A total of 6 community level surveys were conducted with the Mukhtars of Derecikören, Yeşilyayla, Sefercık, Gökçeler, Aşağıhsaniye and Sazköy.

Household Surveys (HHS)

Topics included in the household survey were:

- The level of knowledge of the Project;
- Access to information mechanisms;
- Complaints and feedback about the Project;
- Socio-economic information, including education and skills;
- Livelihoods and income generating activities; and
- Land ownership and land acquisition information, presented in table below.

A total of 91 households were surveyed in the social area of influence.

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**Table 4-1: Household Surveys**

Name of the Village	Number of Household Surveys
Derecikören	11
Yeşilyayla	5
Sefercik	23
Gökçeler	13
Aşağıhsaniye	13
Sazköy	26
Total	91

Fisheries Survey

In addition to the household surveys detailed survey was conducted with the fisheries in the area of influence to understand the impact on their livelihoods and gather their recommendations to prevent the impact on the livelihoods.

Table 4-2: Fisheries Surveys

Name of the Village	Number of Household Surveys
Tarlaağazi	6
Boğazköy Bartın Çayı	8
Filyos	24
Total	38

Focus Group Discussions (FGD)

FGDs were carried to engage with specific segments of the community that might require special engagement and attention, i.e., women, youth, elderly and vulnerable groups. FGDs were used as an effective approach to bring people together with similar characteristics and socio-economic status to discuss specific concerns or potential impacts related to the Project. A total of six FGDs were conducted with the woman in each village.

Key Informant Interviews (KII)

Key informants are individuals who have specific knowledge and expertise in certain areas relevant to communities. In total 20 KIIs were conducted with representatives from:

- Çaycuma District Governorship
- Zonguldak Governorship
- Filyos Municipality
- Saltukova Municipality
- Filyos Chamber of Craftsmanship



- Filyos Fishing Cooperative
- Environmental Protection Association
- West Black Sea Development Agency
- Provincial Port Manager
- District Agriculture Directorate

4.4 Engagement Activities Held by BOTAŞ

BOTAŞ does not have a project-level stakeholder engagement procedure in place. The Project is required to publish a summary of environmental and social information and hold a series of public hearing to inform about its scope and the main activities to be carried out. BOTAŞ has held public information meetings for the expropriation that comply with national requirements.¹

Table 4-3: Summary Table of Public Participation Meetings Held by BOTAŞ

No	District	Settlement/Village	Time
1	Çaycuma	Sazköy	08/01/2022
2	Çaycuma	Aşağı İhsaniye	07/02/2022
3	Çaycuma	Derecikören	08/02/2022
4	Çaycuma	Gökçeler	08/02/2022
5	Çaycuma	Temenler	10/02/2022
6	Çaycuma	Esenyurt	09/02/2022
7	Çaycuma	Yukarı Göynük	10/02/2022
8	Çaycuma	Esentepe	10/02/2022
9	Çaycuma	Çayır	09/02/2022
10	Çaycuma	Güdüllü	15/02/2022
11	Merkez	Sofular	16/02/2022
12	Merkez	Sapça	16/02/2022
13	Merkez	Osmanlı	18/02/2022
14	Merkez	Gerdek (Himmetoğlu)	20/02/2022
15	Merkez	Kabalaklı	18/02/2022
16	Merkez	Elvanpazarcık / Elvan	21/02/2022
17	Merkez	Elvanpazarcık	21/02/2022

4.5 Engagement Activities Held for E&S Assessment of BOTAŞ

Issues discussed with BOTAŞ included a project-specific human resource management plan/procedure, code of conduct, labour contracts, E&S inductions, as well as community safety and security concerns perceived by the

¹ Reference: Batı Karadeniz Gaz Ölçüm İstasyonu ve Doğalgaz Boru Hattı Bilgi Notu (Rev 2), Page number: 5

communities. The community safety and security concerns were particularly discussed in the focus groups for women.

Table 4-4: Summary of Fieldwork

Consultation Date and Method	City/ District	Settlements/ Stakeholders/ Categories	PAPs	Consultation Summary
Project Affected Settlements				
16.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Aşağıhsaniye Village		<ul style="list-style-type: none"> ■ Background information of the Project and PAPs/Stakeholders. ■ Socio-Economic information on settlements (e.g., background demographic information, vulnerable individuals and social issues, previous projects and construction, education, land and economy, housing and infrastructure, use of natural resources in the settlement, places of worship and cultural significance, gender and equality). ■ Land acquisition process carried out. ■ Stakeholder engagement and project perception.
16.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Osmanlı Village		
16.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Himmetoğlu Village		
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Esenyurt Village		
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Yukarıgöynük Village		
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Esentepe Village		
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Kabalaklı Village		
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Sapça Village		
17.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Sofular Village		
17.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Temenler Village		
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Gökçeler Village		
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Derecikören Village		
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Sazköy Village		
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Çayır Village		
18.04.2022 Face to face	Zonguldak/ Çaycuma	Mukhtar of Güdüllü Village		
19.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar of Elvanpazarcık/ Elvan Quarter		



Consultation Date and Method	City/ District	Settlements/ Stakeholders/ Categories	PAPs	Consultation Summary
19.04.2022 Face to face	Zonguldak/ Merkez	Mukhtar Elvanpazarcık/Merkez Quarter	of	
Stakeholders				
16.04.2022	Zonguldak/ Filyos	BOTAŞ Representatives		<ul style="list-style-type: none"> Background information of the Project. Land acquisition process carried out. Stakeholder engagement process and grievance mechanism. Labour-related aspects. Community health and safety – related aspects.
19.04.2022 Face to face	Zonguldak/ Çaycuma	Çaycuma District Governorship		<ul style="list-style-type: none"> Background information of the Project. Stakeholder engagement process and grievance mechanism.
19.04.2022 Face to face	Zonguldak/ Çaycuma	Çaycuma Municipality		<ul style="list-style-type: none"> Land and Economy-related aspects. Use of natural resources.
19.04.2022 Face to face	Zonguldak/ Merkez	Regional Directorate of Forestry		<ul style="list-style-type: none"> Project perception.
Potential Vulnerability and Focus Group Discussion				
18.04.2022 Face to face	Zonguldak/ Çaycuma	Women Focus Group (Sazköy Village)		<ul style="list-style-type: none"> Women's livelihood activities. Education status of women.
17.04.2022 Face to face	Zonguldak/ Çaycuma	Women Focus Group (Esenyurt Village)		<ul style="list-style-type: none"> Public spaces used by women. Security problems. Project perception, expectations and information about project, women engagement of Project. Grievance mechanism.

4.6 ESIA Disclosure Engagement

The Project is categorized as “A” and requires full ESIA disclosure for a minimum of 30 days in English. According to the disclosure requirements full ESIA is disclosed on TP-OTC and SACE websites. Following links represents the website addresses of the full ESIA documents

- TP-OTC: <https://tp-otc.com/cevresel-ve-sosyal-etki-degerlendirmesi-raporu/>
- SACE: <https://www.sace.it/en/about-us/our-commitment/our-environmental-and-social-commitment/details/environmental-and-social-impact-assessment-availability-for-the-sakarya-gas-field-development-phase-i-project>
- EKSFİN: <https://www.eksfın.no/en/cases/https://www.eksfın.no/en/cases/oecd-projects/sakarya-gas-field-development-project-turkeyoecd-projects/sakarya-gas-field-development-project-turkey>

4.6.1 Non-Technical Summary

The Non-Technical Summary (NTS) explains the outcomes of the Project Environmental and Social Impact Assessment (ESIA) and reflects TP-OTC’s ongoing commitment to provide stakeholders with clear, relevant and sufficient information to enable a proper understanding of the Project was disclosed on the Project website both

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English and Turkish to all stakeholders and the disclosure process of NTS started on 25 October 2022. Following links represents the website addresses of NTS.

- English: <https://www.tpao.gov.tr/file/2210/sakarya-gas-field-development-project-non-technical-1062635810a6d7ca9.pdf>
- Turkish: <https://www.tpao.gov.tr/file/2210/sakarya-gaz-sahasi-gelistirme-projesi-teknik-olmay-106163580c59819de.pdf>

In addition to the website, disclosure the hardcopies of the NTS was distributed to the following governmental and non-governmental institutions by TP-OTC's Corporate Communications Coordinator.

Table 4-5: NTS Distribution List

NTS Distributed Stakeholders	Distributed Number of NTSs
Mukhtar of Sazköy	1
Mukhtar of Derecikören	1
Mukhtar of Sefercik	1
Mukhtar of Aşağıhsaniye	1
Mukhtar of Gökçeler	1
Mukhtar of Yeşilyayla	1
Chairman of the Fishing Cooperative	1
Governor of Zonguldak	1
Rector of Zonguldak Bülent Ecevit University	1
Zonguldak Provincial Director of Industry and Technology	1
Provincial Directorate of Turkish Employment Agency	1
Çaycuma Organized Industrial Region Presidency	1
Kdz.Ereğli Organized Industrial Region Presidency	1
Alaplı Organized Industrial Region Presidency	1
Provincial Chamber of Commerce and Industry	1
Çaycuma District National Education Directorate	1
Agricultural Credit Cooperative – West Black Sea Development Agency	1
Ereğli Chamber of Commerce And Industry	1
Ereğli Chamber of Shipping	1
Alaplı Chamber of Commerce and Industry	1
Devrek Chamber of Commerce and Industry	1
Manager of Çaycuma Chamber of Commerce and Industry	1
TOTAL	22



It should be noted that TP-OTC Corporate Communications team will continue distributing the NTS to the governmental and nongovernmental organizations. NTS will be available at all times, at the mukhtar's offices, indefinitely. Any changes or edits to NTS will be communicated to these organizations immediately.

4.6.2 Public Information Meeting

4.6.2.1 Locations

ESIA Disclosure Meetings were organized in the Project affected villages. Instead of holding a single meeting with broad participation, 6 meetings were organized in order to minimize COVID risks, allocate sufficient time to each settlement to express their feedback and ask questions and to focus on settlement specific impacts, and for female participants to express themselves better. The meetings venues are as follows;

- Sazköy Village
- Aşağıhsaniye Village
- Gökçeler Village
- Derecikören Village
- Sefercik Neighbourhood and
- Filyos Fisheries Cooperative

The meeting at Yeşilyayla will be held at a later date, as it had to be postponed due to a funeral at the village.

4.6.2.2 Parties

ESIA Disclosure Meetings were organized by WSP Golder, TP-OTC and BOTAŞ, where BOTAŞ attended the meetings only at the villages affected from the construction of the pipeline, i.e. Sazköy, Aşağıhsaniye, Derecikören and Gökçeler.

TP-OTC

TP-OTC as the owner of the Project, accompanied each meeting and responded to questions from attendees, noted grievances and discussed how these will be addressed.

BOTAŞ

BOTAŞ responded to the following questions from attendees, regarding the pipeline and FMS:

- Questions related with expropriation,
- Compensation for the impacts,
- Submission of grievances and evaluation process.

WSP Golder

WSP Golder, as the Project's ESIA consultant, presented the following topics;

- Project parties,
- Project description,
- Environmental, social and biodiversity baselines,



- Impact assessment and specialist studies and their outcomes
- Summary of mitigations,
- Stakeholder engagement process and grievance mechanism:
 - Project contacts and their contact information
 - Grievance forms
 - ESIA Feedback forms

4.6.2.3 Announcements for the Meeting

The Mukhtars of the villages/neighbourhoods and the Fishing Cooperative representative were informed on the ESIA Disclosure Meeting via phone and face to face visits by TP-OTC Social Impact Specialist and Community Liaison Officer of the Project and the venues of the meetings were selected according to the recommendations of the Mukhtars. An announcement prepared for the meetings that indicates the aim of the meeting, venue and date and the announcement banners were hung to visible locations at the villages 10 days prior of the meetings. The photos of the announcements are provided in the below figures.



Figure 4-3 ESIA Disclosure Meeting Announcement



Figure 4-4 Announcement in Szaköy



OTC

OFFSHORE
TECHNOLOGY
CENTER

**SAKARYA GAS FIELD DEVELOPMENT PROJECT
STAKEHOLDER ENGAGEMENT PLAN**



Figure 4-5 Announcement in Aşağıhsaniye



Figure 4-6 Announcement in Gökçeler



Figure 4-7 Announcement Derecikören



Figure 4-8 Announcement in Sefercik



Figure 4-9 Announcement in Fisheries Cooperative



Figure 4-10 Announcement in Yeşilyayla



4.6.2.4 Project Booklets

The Project booklets were distributed to each participant, and include the below information;

- Project Location Map
- Project Units
- Offshore activities
- Onshore activities
- ESIA studies
- Air Quality
- Greenhouse Gas Emissions
- Noise and Vibrating
- Water and Groundwater
- Waste Management
- Wastewater
- Biodiversity
- Cultural Heritage
- Socioeconomic Impact
- Stakeholder Engagement and Grievance Mechanism



Figure 4-11 Project Brochure

İçindekiler	
Giriş	2
Acık Deniz Bölümü	3
Boru Hattı ve Kıyı Geçişi	6
Kara İşleme Tesisi	7
Çevresel Etkiler	13
ÇSED Çalışmaları	13
Hava Kalitesi	14
İnşaat Aşaması İçin Belirlenen Önlemler	15
İşletme Aşaması İçin Belirlenen Önlemler	16
Sera Gazı Emisyonları	17
Gürültü ve Titreşim	18
Belirlenen Önlemler	18
Yüzey ve Yer Altı Suyu Kaynakları	21
Atık Yönetimi	24
Atıksu Yönetimi	25
Biyocoşululuk	26
Acık Deniz Çalışmaları ve Boru Hattındaki Etki Azaltma Önlemleri	31
Kara Çalışmalarındaki Etki Azaltma Önlemleri	31
Kültürel Miras	32
Sosyo-Ekonomik Etkiler	33
Paydaş Katılımı ve Şikayet Mekanizması	37

Figure 4-12 Content of Brochure



4.6.2.5 Presentation

All presentations were made in Turkish by WSP Golder team explaining the,

- Aim of the Project
- Project parties
- Project location and project units and components
- Project timeline
- Local EIA approval process;
- Aim of the ESIA process
- Environmental, social and biodiversity baseline studies,
- Impact assessment and specialist studies and their outcomes
- The outputs of the ESIA process and the main mitigation measures,
- Stakeholder engagement process and grievance mechanism:
 - Project contacts and their contact information
 - Grievance forms
 - ESIA Feedback forms

The presentations were followed by a robust Question and Answer (Q&A) session (approximately 40 minutes), where stakeholders asked questions and WSP Golder, BOTAŞ and TP-OTC teams were able to provide answers and clarifications to their questions or concerns. These comments and responses are captured in the following chapters.

4.6.2.6 Project Grievance Form:

During the meetings, it was observed that there was a complaint box and forms in each village. During the presentation, grievance forms were distributed to the participants and information about the grievance mechanism was provided.

4.6.2.7 ESIA Feedback Form

ESIA Feedback forms were distributed to the participants and some of the participants filled these forms and submitted them to Social Impact Specialist and Project CLO. Filled forms will be further evaluated in terms of grievance, concerns and recommendations and feedback will be provided to the participants.

4.6.3 Participant Profile

A total of 214 people attended ESIA Disclosure meetings. A separate meeting was not organized for females as same number of male and female participants attended the meetings. It was observed that the highest attendance was in Gökçeler. Participants by village are presented in the table below.

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Table 4-6: Number of Participants

Number of Participants							
Location	Villagers			Project Team			Grand Total
	Male	Female	Total	Male	Female	Total	
Sefercik	13	7	20	5	8	13	33
Fishery Cooperative	19		19	4	8	12	31
Sazköy	14	11	25	6	8	14	39
Gökçeler	16	17	33	6	8	14	47
Derecikören	6	11	17	6	7	13	30
Aşağıhsaniye	14	5	19	6	9	15	34
Yeşilyayla	-	-	-	-	-	-	-
Total	82	51	133	33	48	81	214

4.6.4 Meeting Outputs

4.6.4.1 Sazköy

Meeting Date: 21 November 2022

Time: 09:00

Number of Local Participants: 25

Meeting Venue: Sazköy Village Meeting Room

Gender Distribution of Participants:

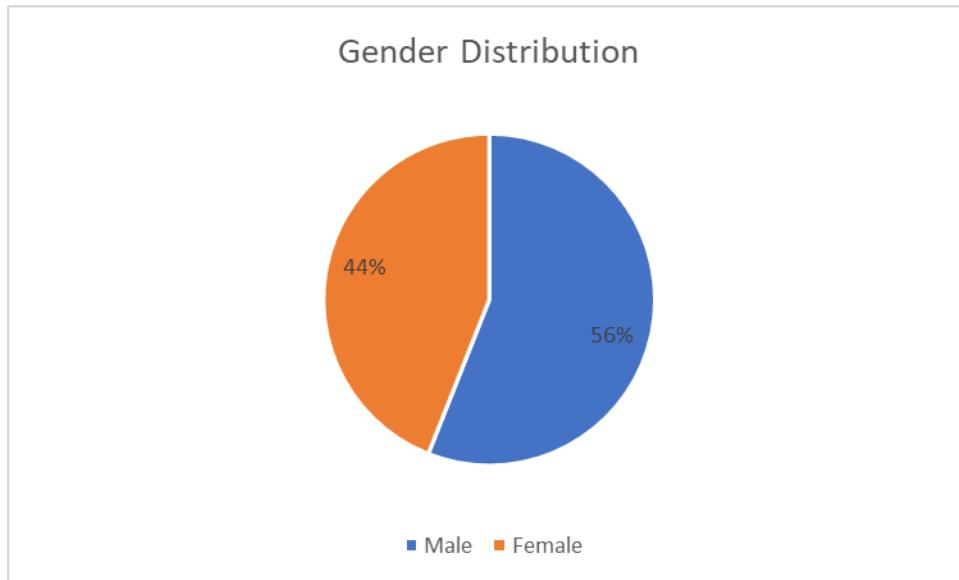




Figure 4-13 Meeting in Sazköy Village

Questions:

1. I live close to the onshore processing facility, will it create an impact (explosion, gas leaks)?

WSP Golder: Modelling studies for various environmental components were conducted and according to the results of the studies, a negative impact that can't be mitigated through design or identified mitigation measures, is not predicted. Project design, stack and filters, flare system, leak detection systems have been selected considering the modelling studies, and an alternatives assessment was carried out to select the most environmentally favourable option. Risk assessment was conducted and an emergency management plan has been prepared.

TP-OTC: The nearest project component containing gas is located 380 meters away from the settlement. There are safety systems and leak detection systems installed.

2. Who will compensate the impacts if there is an explosion?

TP-OTC: The necessary precautions and systems to prevent any accidents are planned at the design stage and implemented during the construction phase, however in case of a possible accident, the resultant impacts will be further evaluated and compensated by the government.

3. Will we be able to benefit from natural gas?

TP-OTC: There's a line that goes to the Filyos from BOTAŞ pipeline. However, the distribution of the natural gas to the residential areas is under the responsibility of Akmercan Batıkargaz Natural Gas Company.

4. Will you conduct any road improvement work? Roads to other settlements were constructed.

TP-OTC: There has been significant improvements to the road network. Road improvement works will continue.

5. Project vehicles are not obeying the limit rules.

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TP-OTC: Licence plate numbers should be delivered to social impact specialist and CLO for the resolution. A reminder to the contractors will be issued.

6. There are no pedestrian crossings on the new road.

TP-OTC: Since the landowners have not agreed to the additional land requirement for the pedestrian crossing, it was not possible to build it, however alternatives will be -evaluated for the safe crossing of the pedestrians.

7. We want handcraft courses in our village and trainings that will make women earn money. The trainings to be given in Filyos are far away. How do we go from here?

TP-OTC: You can submit your requests through participation forms and TP-OTC will evaluate training courses for female members of the local communities. (A form was distributed to collect the requests during the meeting.)

4.6.4.2 Aşağıhsaniye

Meeting Date: 21 November 2022

Time: 11:00

Number of Local Participants: 19

Meeting Venue: Aşağıhsaniye Village Meeting Room

Gender Distribution of Participants:

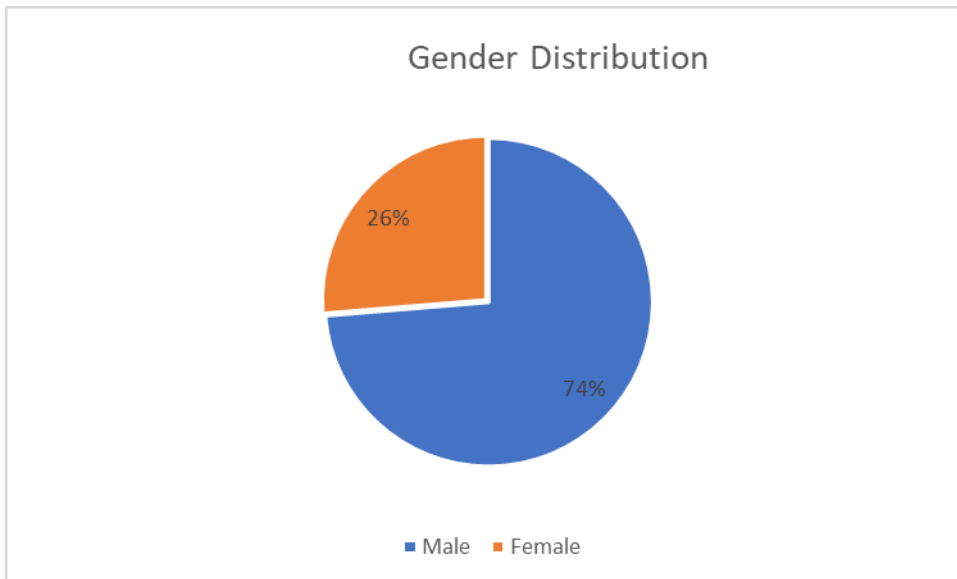




Figure 4-14 Meeting in Aşağıhsaniye Village

1. It was stated by the attendees that they wanted pedestrian walkways. There were grievances related with the construction of the energy transmission line and the lack of pedestrian walkways. The current road condition is not safe for children and animals. Heavy vehicles are using the road and that creates safety problems.

TP-OTC: Since the landowners have not agreed on the additional land requirement for the pedestrian crossing it was not possible to build it however alternatives will be -evaluated for the safe crossing of the pedestrian.

2. We tried to reach to deliver our grievances during the road construction but we could not reach you.

TP-OTC: You can always reach social impact specialist and CLO maybe you tried to contact the contractor of the road construction.

3. New roads are requested.

TP-OTC: Road construction at the section requested is under the responsibility of another governmental bodies. You can raise your request and we can convey them to the relevant authorities.

4. Are you planning further expropriations?

TP-OTC: There will not be any further expropriation for this Project. You will be able to use your agricultural lands after the completion of the construction of BOTAŞ pipeline.

5. We have concerns on the water channels of the State Hydraulic Works.

TP-OTC: This issue will be discussed with State Hydraulic Works.

6. During the construction of the pipeline, hazelnut gardens and septic tanks were affected and this -impact was not compensated by BOTAŞ.

BOTAŞ: The relevant documentation for compensation is prepared by BOTAŞ and delivered to headquarter of BOTAŞ. Compensation payment will be done accordingly.

4.6.4.3 Gökçeler

Meeting Date: 21 November 2022

Time: 13:00

Number of Local Participants: 33

Meeting Venue: Gökçeler Village Meeting Room

Gender Distribution of Participants:

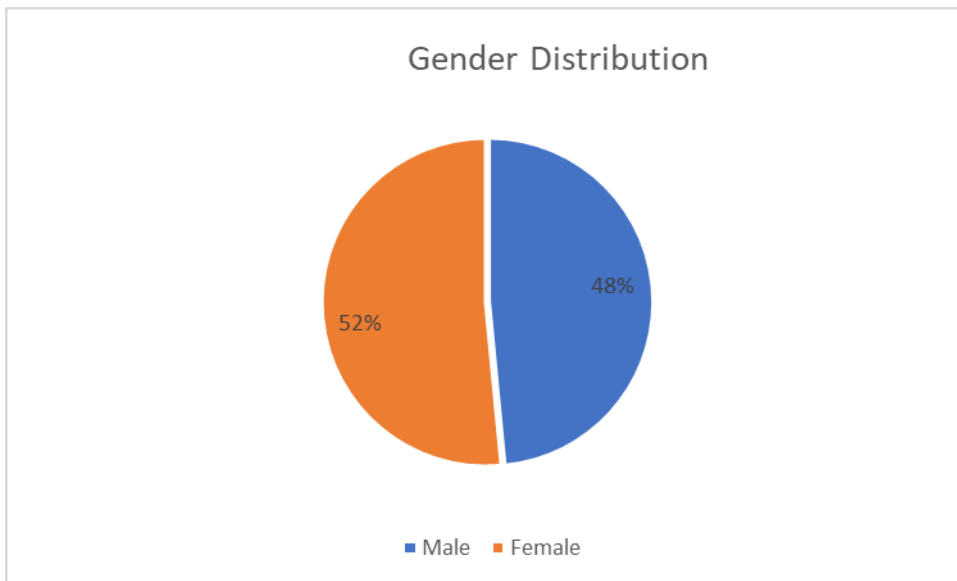


Figure 4-15 Meeting in Gökçeler Village



1. What is the security zone of BOTAŞ pipeline for the construction of the housing?

BOTAŞ: At least 25-38 m. It depends on the gas pressure and the thickness of the pipeline. When you apply for a permit, the necessary calculations would be made and you would be informed.

2. We did not get benefit from the road construction.

TP-OTC: General Directorate of Highways is responsible for planning and construction of the roads.

3. We request environmental and social projects and activate the school and responsibility projects such as playground for children and language trainings for children.

TP-OTC: Currently Project employs approximately 7,500 people and 1,550 of them are hired locally. TP-OTC would like to continue social responsibility projects however, the Project has a limited work schedule and government priorities and complying with the project schedule may cause delays realization of the corporate social responsibility projects. There is mobile education with the decision of held Ministry of Education. The notes on the language training and playground were taken and they will be evaluated.

4. We filled grievance forms related with the individual requests related with the activities for our kids however no feedback is received on our grievance

TP-OTC: Personal request and cash requests will not be responded.

5. What type of social responsibility projects have you realized?

TP-OTC: A health center with five ambulances was built, free of charge. 1500 local people employed from the region. A vocational school was established in Çaycuma. Unskilled labour opportunities were provided to uneducated people such as uneducated housewives. The -shelters were installed at Mosques. -

6. Locals want to get benefit from the Project.

TP-OTC: We received 60 grievances/request from 6 villages. 50 of them were closed and 10 of them are under the evaluation process.

7. Can you provide help on the maintenance of the Mosque?

TP-OTC: Noted and will be evaluated.

4.6.4.4 Derecikören

Meeting Date: 21 November 2022

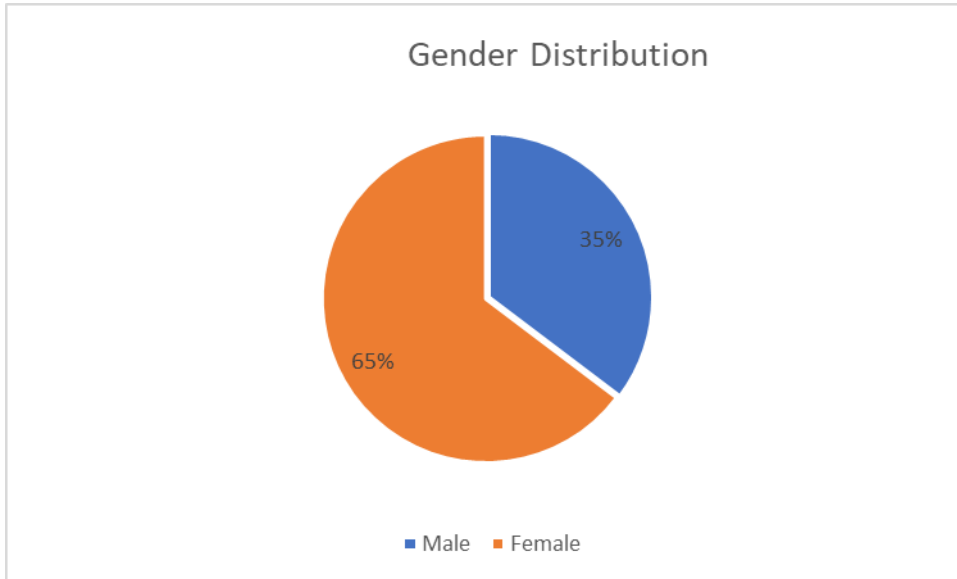
Time: 15:00

Number of Local Participants: 17

Meeting Venue: Derecikören Village Meeting Room



Gender Distribution of Participants:



1. The pipeline route is located in the close proximity of the houses.

BOTAŞ: Relevant technical calculations were done to determine the distance of the pipeline and the houses. Necessary information will be provided during the operation period. The distances are compliant with the BOTAŞ technical specifications where it is calculated based on the natural gas pressure and pipeline thickness.

2. Will we be able to benefit from the natural gas?

TP-OTC: BOTAŞ is not the local distributor. Akmercan Batıkargaz Natural Gas Company is the authorized on this issue. A connection point to Filyos has been built by BOTAŞ. The decision will be taken by the distribution company.

3. There are elderly people in the village. Give us the gas before we die. Let's live comfortably.

TP-OTC: You can submit your requests to the relevant distribution company.

4. What type of infrastructure supports are realized by TP-OTC?

TP-OTC: The flood problem is prevented; the road is being built.

5. Will there be any other expropriations?

TP-OTC: TP-OTC does not have any plan for further expropriation for this Project.

4.6.4.5 Sefercik

Meeting Date: 22 November 2022

Time: 09:00

Number of Local Participants: 20

Meeting Venue: Sefercik Village Meeting Room



Gender Distribution of Participants:

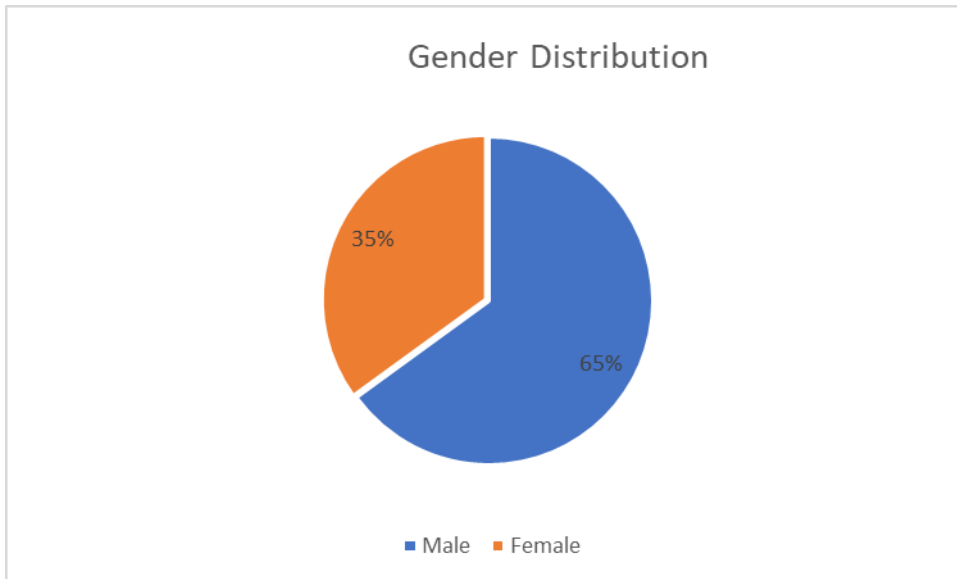


Figure 4-16 Meeting in Sefercik Village

1. Will there be additional expropriation here?

TP-OTC: There will be no further land acquisition within the scope of the Project.



2. Our village is the most affected within the scope of the project. The roadside is full of excavations and waste. We expect maintenance of the road. The animals are damaged due to the conditions of the roads. The septic tank of the mosques and the walls of the playground were damaged during the road construction. In order to make the entrance of the neighbourhood look better we request fence. We expect compensation for the damages. We demand a bus-stop to be constructed.

TP-OTC: All requests are noted and will be addressed as soon as possible.

3. There is a water engine in the stream, which harms the fish. Who does this engine belong to?

TP-OTC: This will be checked with the State Hydraulic Works. Project is not abstracting water from the stream.

4. For the next meeting president of Filyos Municipality should be invited.

TP-OTC: As required by the law, in order to hold a meeting, Zonguldak Governorship was officially informed. The institutions will be informed separately.

5. Health employees are not complying with the speed limits.

TP-OTC: The manager of the health employees is warned. (A call was made onsite, immediately)

6. What will happen to contractor workers after the completion of the construction?

TP-OTC: For the next phases of the Project priority will be given to them.

7. Improvement of the bridge over the Sefercik exit is requested.

TP-OTC: Noted

9. The mosque was promised to be illuminated and painted. It was not done either.

TP-OTC: Noted

4.6.4.6 Fishery Cooperative

Meeting Date: 22 November 2022

Time: 13:00

Number of Local Participants: 19

Meeting Venue: Filyos Fishing Cooperative



Figure 4-17 Meeting in Cooperative

1. Due to the light emissions of the Filyos Port at night, the fish amount decreased considerably. The income from the fishing is lost. There are fish in Bartın however the fish has changed direction due to the light, excavation and filling works. Especially in terms of bottom fishing, this region was damaged. It is not possible to access areas where we usually fish and where fish is abundant. We need to travel farther. Our equipment has been damaged from rocks and one buoy.

TP-OTC: This impact is temporary and will be completed soon. Your grievances are noted and we are working on addressing them. The damaged net will be compensated.

2. Trucks coming from the hub tunnels are coming too fast.

TP-OTC: The corridor with the barriers will be narrowed.

3. Since they cannot enter the fishing area due to NAVTEX fishers are not able to continue beam trawl or bottom fishing.

4. We do not understand the NAV line limits. Please provide maps.

5. The ship passes very close to the fishermen and their attitude is not proper.

6. Do I have to make a transit pass? Do we have to go over the barges?

7. I want improvements in our shelters.

TP-OTC: All concerns of the fishers are recorded and will be evaluated. We are working on developing solutions, reviewing documentations.



4.6.5 Conclusions

The ESIA was disclosed to 5 villages and the Fishery Cooperative and the governmental and nongovernmental stakeholders. It is observed that the Project has established a successful grievance mechanism where the stakeholders can reach out to the Project representatives, Social Impact Specialist and CLO. There are various ways of submitting feedback and grievances, which have been disclosed to public.

It has been observed that the local stakeholders are satisfied from the community supports provided by the Project. However, considering the nature of the construction works there are some concerns related with the Project. The main concerns of the local stakeholders are;

- All villagers have inquired about the future expropriation plans,
- Health & security impacts (such as explosion, gas leaks),
- Safety distances to the pipeline,
- Speed limits,
- Community health and safety impacts related with the lack of pedestrian walkways,

Common requests from the villagers:

- Access to natural gas,
- Requests for vocational training for women,
- Requests for playground, soccer field, mosque repairs, school,
- Improvement of roads, pedestrian walkways,
- Long term Local employment opportunities.

According to the consultations with the Fishers most of the grievances were expressed as follows;

- Fishers have been made aware of the Livelihood Restoration Plan (LRP) regarding the compensation process fishers requested that the compensation payments will be completed as soon as possible. TP-OTC explained the process will be finalized soon considering their feedbacks.
- It is claimed that light emissions negatively impact the fish.
- They can't access their fishing areas. They are not able to fish in areas where the fish are abundant.
- Their equipment have been damaged, from large rocks that were probably dumped during the port construction. TP-OTC explained that port construction is not within the scope of the Project.
- They need to sail further for fishing.
- Not all of them expressed the same concerns, while some indicated they can't fish at all, some indicated they need to sail further but the harvest is still not sufficient.
- NAVTEX coordinates have been previously provided via face-to-face meetings, calls, and the information of coastal security units; however, the fishers would like to see a hard copy map to better understand the locations of buoys. TP-OTC handed the required maps during the meeting.

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- They have complained about the attitude of the local guards, warning them not to approach the NAVTEX corridor. – TP-OTC will take action and talk to the responsible parties. A training is scheduled for December 8th, 2022.
- Due to the reasons regarding the Phase-1 pipeline maintenance, inspection of life of field service and strategic security, a security corridor for the offshore pipeline will be permanent, less narrow than the existing corridor.

4.7 Media Briefing

4.7.1. Briefing for Foreign Media

Meeting was held with TPAO General Manager, Site Manager, and the foreign press. General information about the project was given, questions of the press was answered. Information about the project area via project mock-up were provided.



4.7.2. Briefing for National Media

Meeting was held with TPAO General Manager, Site Manager and the national press. General information about the project was given including information on the project area via project mock-up, and questions of the press were answered.



5.0 STAKEHOLDER ENGAGEMENT PROGRAMME

The SEP is designed to ensure that TPAO & TP-OTC identifies all stakeholders with an interest in the Project and engages with these stakeholders before construction, during construction and operation of the Project. This SEP therefore outlines TPAO & TP-OTC’s consultation activities to engage with stakeholders during the construction and operational phases of the Project. Therefore, the SEP is tailored to consider the main characteristics and interests of the affected parties, and the different levels of engagement and consultation that might be appropriate for affected parties and other interested parties. The program indicates how consultations will be conducted with different groups in the community, also identifying actions that will be taken to remove barriers to participation. These may include such issues as differing ages and gender, giving rise to different concerns and priorities about the Project’s impacts, preventative and mitigation measures, and potential benefits. Therefore, different and/or separate levels of engagement will be conducted by TPAO & TP-OTC. Overall, the engagement strategy to be applied is basically based on continuous open communication and negotiations with all stakeholders, avoiding impacts and minimizing the impacts when it cannot be avoided, and establishing high-level contacts with stakeholders in different layers at regular intervals.

5.1 Information Disclosure and Project Information

TPAO & TP-OTC will disclose Project information to enable stakeholders to understand the Project description and the aim of the Project, risks and impacts of the Project and the mitigation measures tools for the submission

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of the grievances, Project timeline as well as potential opportunities associated with the Project. The disclosure of information will be in truthful, timely, coherent, inclusive and the appropriate attention and response will be given to petitions, complaints, grievances, requests, and allegations.

The Project has following documents to be disclosed to the stakeholders in various phases.

- Non-technical summary of the Project,
- Environmental and social documents, Environmental and Social Impact Assessment, Environmental and Social Action Plan, Stakeholder Engagement Plan, Livelihood Restoration plan and the other environmental and social management plans of the Project,
- Project brochure,
- Grievance Mechanisms,
- Project progress updates
- Information leaflets, letters and other documents on progress update, restrictions, investment programs and other relevant issues for stakeholders

The following stakeholder engagement tools will be used:

- A Project information office where all interested stakeholders can walk in to obtain information and documents.
- Information boards in Project area and communal places in affected communities,
- Offices of the governmental institutions including Mukhtar's office,
- Notice boards in the nearest settlements,
- Website of TP-OTC and website of the Project
- Regular meetings, visits, focus groups discussions with relevant community members, as groups and with community representatives,
- Dissemination of information through media, press and social media
- Email, telephone, post and in person
- Public events
- Individual and focus group meetings

As needed, high level information will be conveyed by the managers to relevant authorities through visits and meetings. The Community Liaison Officer will frequently share information on progress updates, restrictions, opportunities etc., with affected communities, local NGOs and other important stakeholder and local governments. Information for the public will be made available on the website, media and social media.

It should be noted that, considering the COVID-19 pandemic, the proposed methodologies will be adapted on a case by case basis and could include virtual communication such as phone calls, online meetings, small focus

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group discussions applying the mitigation measures such as outdoor meetings, provision of hygiene package that includes disposable face masks and disinfectants.

TPAO has an information disclosure policy and in line with the principles of transparency and accountability, has adopted the principle of communicating effectively and timely with its stakeholders. TPAO believes in the importance of Stakeholder participation and timely informing of the public during the project planning and implementation phases. In this context, we hereby undertake;

- To communicate with our stakeholders in all our activities in a way that is based on participative and mutual trust.
- To disclose the principles, practices and procedures of information and public disclosure,
- To ensure that information that is not classified as "Confidential Information" regarding our institution, activities and projects is made available to the public, as information determined to be confidential constitutes an exception to our principles of informing the public and stakeholders,
- To classify the information and documents prepared for the purpose of informing the public,
- To make accessible the information we have available via the website, in particular the annual reports, financial reports, policies, fields of activity, annual sectorial reports, sustainability reports, tender announcements and press releases,
- To publish the summaries of reports and the summaries of the financial statements, including revenues, assets and liabilities,
- To publish the website in Turkish and in English and to have the basic documents available at the site in both languages,
- To examine the information requests received in cooperation with the relevant units,
- To meet the information requests as soon as possible in accordance with the legislation,
- To process the requests received from the Ministry of Energy and Natural Resources, TPAO Information Unit (bilgi@tpao.gov.tr) and CIMER in accordance with the same procedure,
- To take the necessary measures to protect the interests of TPAO or of the private (including personal privacy) interests,
- To ensure that these principles apply to any and all non-confidential information we collect regarding our activities in any medium (printed or electronic, including in some cases audio, visual or audio-visual recording).

TP-OTC also has a Disclosure Policy and according to this Policy TP-OTC believes the importance of stakeholder engagement and public information on time within the scope of the projects conducted with transparency and accountability principles. Accordingly, TP-OTC pledges to:

- Adopt the respective information and public disclosure methods such as official correspondences, press, social media, websites, public meetings, e-mails, short messages (sms) etc. on the condition that this is in compliance with the respective corporate policy and the current applicable legal requirements,

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- Ensure disclosure information that is not classified confidential concerning the company's operations and projects,
- Classify such information and documents that are prepared for public disclosure purposes,
- Make available the corporate website in Turkish and English, and present fundamental documents thereon in both languages,
- Analyse information requests acting in cooperation with the respective departments and, proceed with them within the shortest time possible according to the applicable legislation,
- Take necessary actions in order to the interest of the company and/or of the respective stakeholders (including privacy),
- Ensure that these principles apply to any type of non-confidential information produced in relation with the company's operations (including printed, electronic, audio, and visible records).

5.2 Stakeholder Consultation and Engagement Activities

The stakeholder engagement processes for the Project will be based on the following key principles. These principles will enable TPAO & TP-OTC to build open, constructive, inclusive, and respectful dialogue as well as a working relationship with all relevant stakeholders.

- Continuous engagement with all stakeholders
- Proactive stakeholders' visits for key stakeholders identified
- Grievance mechanism to address complaints and grievances effectively
- Engagement of vulnerable groups actively through specific measures
- Supporting consultations and dialogue with community investment programs
- Avoiding adverse effects, minimizing when they cannot be avoided as well as in advance and proper information disclosure on these for affected stakeholders and communities

SEP Execution team composed from Corporate Communications Coordinator, Spokesperson, Senior Social Impact Specialist and Community Liaison Officer will conduct consultation with community members and other concerned stakeholders as well as ensuring that the grievance mechanism is functioning properly throughout the implementation of Project activities using communication channels outlined above or deemed appropriate in relation to the specific stakeholder needs and circumstances. The CLO, as mentioned above, will be actively in contact and consultation with local communities and other affected primary stakeholders.

SEP Execution team engaged with affected fishermen and fishery organizations regarding the restrictions during construction and operation phase. Timely disclosure of information on restrictions were be made on site as described in Fishing Information Disclosure and Engagement Plan. (Please see Appendix-C for the Plan) Appendix-C. This includes informing the stakeholders regarding impact mitigation and management plans for the impacts that the project may have on fishing activities.

The approaches taken will thereby ensure that information provided is meaningful, timely, as complete as possible, and accessible to all affected stakeholders, as well as challenges deriving from illiteracy or disabilities, tailored to the differences in geography, livelihoods, and way of life. The Project will also ensure the

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establishment of a Grievance Mechanism, details of which are provided in grievance management section. The Project will also establish a worker grievance mechanism to enable all direct workers and contractor and subcontractor workers to raise workplace and labour rights related concerns.

TPAO & TP-OTC will ensure that women, persons with disabilities and other members of vulnerable groups are participating effectively and meaningfully in consultative processes and that their voices are not ignored. This will be ensured through specific measures and assistance to afford opportunities for meetings with vulnerable groups in addition to general community consultations. For example, women are usually more outspoken in women-only consultation meetings than in general community meetings. Similarly, separate meetings need to be held with young people, persons with disabilities.

The Project employed a CLO at the early stages to ensure that stakeholders especially affected local communities and vulnerable groups are informed and consulted properly. Additionally, the Project also employed consultants to advise and support Project staff for realizing an effective stakeholder engagement program.

Furthermore, it is important to rely on other consultation methods as well, which do not require physical participation in meetings, such as social media, SMS, or radio broadcasting, where feasible, to ensure that groups that cannot physically be present at meetings can participate. Where this is not possible, CLO and other staff/consultants will visit households of vulnerable people, in particular the elderly and persons with disabilities that are not able to attend communal meetings.

The program of engagement activities that will be performed throughout the lifecycle of the Project is provided in the table below.

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Table 5-1: Stakeholder Engagement Programme

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Before Construction	Project Affected People Residents of the settlements in the Social area if influence Fisheries Vulnerable people PAPs of Associated Facilities	Introduce CLOs of TP-OTC and sub-contractors Project update Livelihood restoration Grievance mechanism process Employment Vulnerability and gender issues Community health and safety issues	Focus group discussion, Trainings/workshops. Public notices; Electronic publications via online/social media and press releases; Distribution of the hard copies of the Project documents to Mukhtar offices Media announcements Information leaflets and brochures; Women only focus group discussions	Project information meetings. ESIA and LRP surveys Before construction in each settlement	TPOTC
	Governmental Parties Municipalities Governors District authorities Academic institutions	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement process and the Grievance mechanism process	Individual meetings Small village meetings Official correspondence Mail, phone calls	When required	TPOTC
	Non-governmental Parties Press and media; NGOs; Businesses and business organizations; Workers' organizations;	Environmental and Social Impacts of the Project and the mitigation measures Stakeholder engagement process and the Grievance mechanism process	Press releases Information leaflets and brochures; audio-visual materials	In each project phase and when required	TPOTC

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Construction	Project Affected Parties - Project Affected People Residents of the people in the Project Area? Vulnerable groups Local businesses PAPs of Associated Facilities	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods Construction updates and construction schedule Corporate Social Responsibility Projects	Small Public meetings, Continuous communication with the Project CLOs Trainings Women only focus group discussions Phone notifications Social media Press release Grievance mechanism Project website	Monthly meetings in all affected settlements to update information on the updated construction status Receive construction related grievances	TPOTC
	Other Interested Parties Governmental intuitions National and local media Non-governmental institutions Business organizations	Environmental and social awareness Construction phase E&S impacts Community health and safety issues Local employment Impact on livelihoods due to construction Construction updates and construction schedule Corporate Social Responsibility Projects	General information meetings Press release Institution visits Grievance mechanism	When required	TPOTC

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
Operation	Project Affected Parties - Project Affected People Residents of the people in the Project Area? Fisheries Vulnerable groups Local businesses PAPs of Associated Facilities	Transition process from construction and operation phase Introduce operation phase CLOs Introduce role for the operation phase grievances Operation phase E&S issues especially community health and safety Disclosure of LRP	Focus group discussion Workshops, Individual meetings Press releases Social media accounts of TPOTC Grievance mechanism	Information disclosure on national and local media Brochures and information banners at the stations	TPOTC
	Other Interested Parties (External) Governmental and Nongovernmental bodies Local businesses	Transition process from construction and operation phase Business opportunities Introduce TPOTC role for the operation phase grievances Operation phase E&S issues especially community health and safety Disclosure of LRP	Press releases Social media accounts of TPOTC Grievance mechanism	Information disclosure on national and local media Brochures and information banners at the stations	TPOTC

5.3 Timelines and Schedule

Table 5-2: Stakeholder Groups

Stakeholder	Information Content to be Disclosed	Engagement Tools	Timeframe
Residents living in close proximity to Project area PAs of Associated Facilities	Project update (non - technical introduction, figures, impacts and management, progress update, restrictions and community safety, grievance mechanism, vacancies and corporate social responsibility projects, operation activities, LRP	Information boards with post box, leaflets, Regular meetings, visits, focus groups discussions with relevant community members, as groups and with community representatives, Women only focus groups implementation of the grievance mechanism and, dissemination of information through media, press and social media Website Email, telephone, post and in person Public events Individual and group meetings	Continuous and regular during construction and operation
Land users for agricultural and animal husbandry purposes in the proximity of the Project area PAs of Associated Facilities	Project update (non - technical introduction, figures, impacts and management, progress update, restrictions and community safety, grievance mechanism, vacancies, and corporate social responsibility projects, operation activities, LRP	Information boards with post box, leaflets, Web site Regular meetings, visits, focus groups discussions with relevant members, as groups and with community/organizations representatives, implementation of the grievance mechanism and, dissemination of information through media, press and social media Email, telephone, post and in person Public events Individual and group meetings	Continuous and regular during construction and operation
Fishermen and Fishery organizations	Project information (non - technical introduction, figures, impacts and management, progress update, restrictions and safety, grievance mechanism, operation activities, LRP	Information boards with post box, leaflets, Meetings, visits, focus groups discussions with relevant group members and representatives, implementation of the grievance mechanism and, dissemination of information through media, press and social media Email, telephone, post and in person Public events	Continuous during construction and operation

Stakeholder	Information Content to be Disclosed	Engagement Tools	Timeframe
Vulnerable Groups	Project information (non-technical introduction, figures, impacts and management, progress update, restrictions and community safety, grievance mechanism, vacancies and corporate social responsibility projects, operation activities)	Engagement will be tailored based on their needs i.e. separate/specific meetings, visits at home, delivery of information documents to home, set up of separate communication groups	Regular and continuous during construction and operation
General Public (including residents of, and visitors to, the Local Communities)	Project information (non-technical introduction, figures, impacts and management, progress update, restrictions and community safety, grievance mechanism, vacancies and corporate social responsibility projects, operation activities)	Information boards with post box, leaflets, website, visits, press and media reports	Continuous during construction and operation
Businesses in Filyos, Çaycuma and Saltukova villages	Project information (non-technical introduction, figures, impacts and management, progress update, procurement opportunities operation activities and LRP)	Website, meetings and visits, emailing and sending letters	Inform and update businesses as needed during construction and operation
Community Services and Infrastructure Organizations	Project activities, permit requests, restrictions, progress update, operation activities	Email, telephone, post and in person Meetings and correspondence	As needed
National and Regional (Local) Government Authorities	Permits and compliance issues, Project progress update, operation activities, LRP	Email, telephone, letters Meetings and correspondences	As needed
Local Government and Community Representatives	Permits and compliance issues, Project progress update, opportunities and corporate social responsibility projects, operation activities, LRP	Email, telephone, letters Meetings and correspondences	As needed

Stakeholder	Information Content to be Disclosed	Engagement Tools	Timeframe
Non-Governmental Organizations (NGOs)	Project and activities information, progress update, impact management activities and other information as requested	Telephone, emailing, web site and social media, through press, visits and meetings	As needed
Media and Press	Detailed Project information, progress update, environmental and social management issues, community investment programs and other information requested, operation activities, LRP	Telephone, e-mails, meetings and visits, website	As needed
Academic and Research Organizations	Detailed Project information, progress update, environmental and social management issues, community investment programs and other information requested	Telephone, e-mails, visits and meetings, website	As needed or requested
Employees of the Project	Detailed Project information, progress update, environmental and social management issues, community investment programs and other information, grievance mechanism for workers, Operation activities * Working conditions and Code of Conduct * Trainings H&S Announcements	Face-to-face meetings Trainings Toolbox Safety and innovation campaigns Newsletters, posters, and memos Website Employee grievance mechanism Employee satisfaction surveys, etc.	Prior to construction, regular updates during construction

6.0 GRIEVANCE MANAGEMENT

A grievance mechanism is implemented to ensure that the Company is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care placed on the training of the designated staff involved in the management of the grievance mechanism. The grievance mechanism is open and accessible to all individuals and groups.

The Project has a transparent and unbiased grievance mechanism to:

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- identify issues and concerns as early as possible to address them timely and proactively
- continuously improve Project performance
- demonstrate Project's commitment to meaningful stakeholder engagement, and respect for stakeholders' opinions and concerns.

6.1 PRINCIPLES

The Project has a grievance procedure based on following key principles:

- Any person or organization can express concerns, complaints, and grievances at any time, without fear of retribution and retaliation.
- All grievances are treated in a fair and respectful manner.
- When a grievance is received, TPAO & TP-OTC will respond to the stakeholder to confirm its receipt within five (5) business days. At this time, the stakeholder will also be provided information about response times, next steps, and a contact within the team. The target is to resolve grievances within 30 calendar days.
- The process (receive, investigate and resolve) is consistent and transparent.
- Information about a grievance (and related investigations and decisions) is documented.
- Personal information about the affected stakeholders is treated as confidential. TPAO & TP-OTC respect other confidentiality requests as needed. Submission of anonymous grievances shall be allowed. The grievance mechanism also receives complaints related to gender-based violence, sexual harassment and sexual exploitation and abuse (GBV-SHSEA).
- The related to project activities, project management, TPAO&TP-OTC activities or contractor including sub-contractor activities can be submitted through grievance mechanism.

The steps that are followed for the resolution of grievances is shown in the diagram below.

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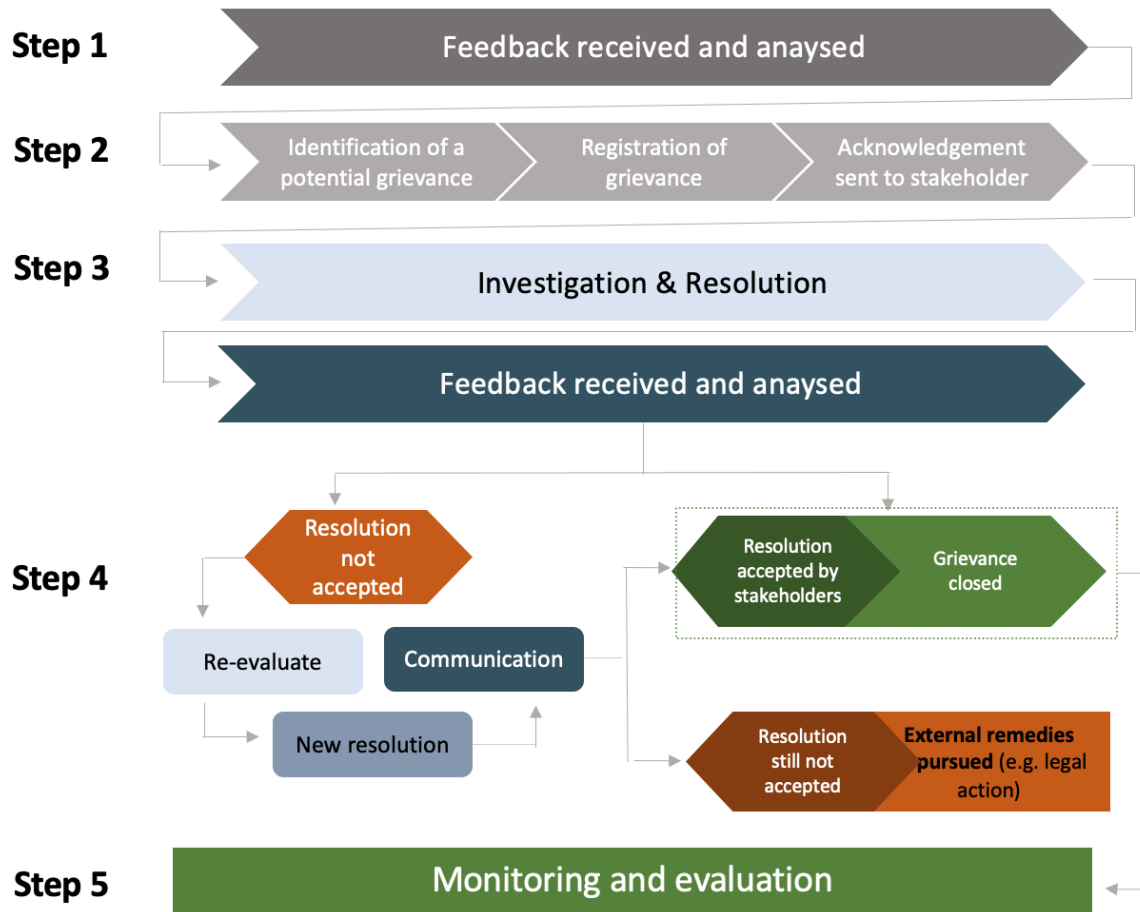


Figure 18: Diagram of GRM

A separate, but similar internal grievance procedure is implemented for workers, including Staff, employees of TPAO & TP-OTC, its contractors and sub-contractors, suppliers, and customers.

6.2 PROCESS

Social Impact Management Team is the main responsible for execution of Grievance Mechanism. Appeals Committee will oversee grievance management overall and will ensure that the grievances are resolved and monitored effectively. Grievances are managed through a software(SAP) by Social Impact Specialist and CLO to close communication with Investigation Team including TPAO & TP-OTC Engagement and Communication Senior Expert, CLO, TPAO & TP-OTC information office public relations staff who also acts as complaint registrar, TPAO & TP-OTC environmental expert, site management representatives (onshore and offshore), contractor and supplier management representatives. These core team conducts initial assessments and involve other technical staff for resolution and response. Social Impact Specialist is responsible for following up resolution and responses.

Employee grievances are separately managed and forwarded to human resources after registered in the software (SAP).

Step 1 – Feedback received: Stakeholders can convey their feedbacks related to the Project in many ways; verbally during a meeting, via website, email, call, or official correspondence etc. In either way, Social Management Team will ensure that it is documented, incorporated, and responded to as needed. In some cases, this process may identify a grievance. If so, Step 2 is initiated. Social Management Team will response the enquiries in five (5) business days.

Step 2 - Grievance logged: When a grievance is identified, it is officially registered in the software and given a unique identification number. Grievance Form is filled out for each grievance (Annex A). This form consists of complainants contact information and details of the complaint. It is categorized based on the type of complaint and its severity. The main complaint issue categories are as follows²:

- Social Impact
- Environmental Impact
- Compliance Impact
- Community Security
- Human Rights

List of grievances subcategories in the Annex-C

Following the registration of the complaint, an initial response is sent to the person(s) who raised the grievance including the registration number for follow-up, acknowledging their feedback, and describing the next steps in the grievance process, time estimates for these steps and a contact person. Apart from the official mechanism, the complaints arising from the contacts are added to the log with a different code than the complaints received through the official mechanism. These complaints are also being made a part of the process with the same method.

Step 3 - Investigation and resolution: Investigation Team investigates grievances and their surrounding circumstances if necessary. These investigations are undertaken in a timely manner involving further staff and experts if necessary. The results of these investigations are reviewed, and a resolution is proposed. The development of the resolution may involve consultation with the person(s) involved and in some cases with an independent third party. Grievances regarding human rights violations, Gender Based Harassment, and wrong doings will be evaluated by Appeals Committee. The proposed resolution is then formally communicated to all parties. Social Management Team completes the process and respond to the complainant in 30 calendar days.

Step 4 - Resolution: If the resolution is accepted by all parties, it is implemented, and the grievance is closed using Grievance Closure Form (Annex B). If the resolution is not accepted, it will be reconsidered, and a revised resolution may be proposed. The affected person(s) may choose to pursue external remedies at any time, including if an agreed resolution cannot be found.

Step 5 - Monitoring & Evaluation: After the resolution has been implemented, it is monitored, and its effectiveness will be evaluated. All parties are notified that the resolution has been implemented and have the opportunity to provide feedback on the grievance process and its implementation.

² Categories are subject to update along the process.

6.3 INSTITUTIONAL SET UP AND RESOURCES

Social Management Team composed by Social Impact Specialist and CLO. The team has the main responsibility of execution of this plan including delivery of activities and overall management of relations with stakeholders, grievance management and monitoring and evaluation. This core team will be supported by Investigation Team.

Appeals Committee consisting of TPAO Corporate Communications Department, TP-OTC HSSE and HR management is responsible for ensuring Grievance Mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances related to human rights violations, mobbing, Gender Based Harassment, and wrong doings (bribery, actions against business integrity principles) as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

Action Team

- HSSE Team
- Site Management Representatives
- Onshore and Offshore Construction Team
- Contractor
- Supplier Management Representative

Appeals Committee

- Vice President
- HR Coordinator
- Corporate Communications Coordinator
- HSSE Coordinator
- Communications, Regulations & Reporting Specialist

Social Management Team

- Social Impact Specialist
- CLO

Table 6-1: Key Performance Indicators (KPIs)

Name of the Person and Title	Contact Information
Casim Can Hindioğlu Social Impact Specialist	0531 651 41 48 cchindioglu@tp-otc.com
Şeyma Yılmaz Community Liaison Officer	0531 886 46 82 seyilmaz@tp-otc.com

6.4 REPORTING (Monitoring)

Both public and worker grievances will be reported according to the following criteria.

- Total number Grievances
- Breakdown the number of grievances:
 - By status (open, in progress, resolved, closed for SAP)
 - By complainant location
 - By the location of the grievance
 - By status of the complainant (Real Person / Institution / NGO / Anonymous etc.) in Public GRM

- By grievance issue main category and sub-category
- Complainant contact information
- Key word-based reporting

6.5 Grievances Up to Date

Between 3 March 2022 and 12 May 2023, a total of 106 grievances were received. While 101 of the incoming complaints were resolved and closed, 5 of them are still open. Of the complaints received, 96 were related to Social Impact, 7 to Environmental Impact, and 3 to Community Safety. No complaints or suggestions were received from the stakeholders regarding the Impact of Compliance and Human Rights.

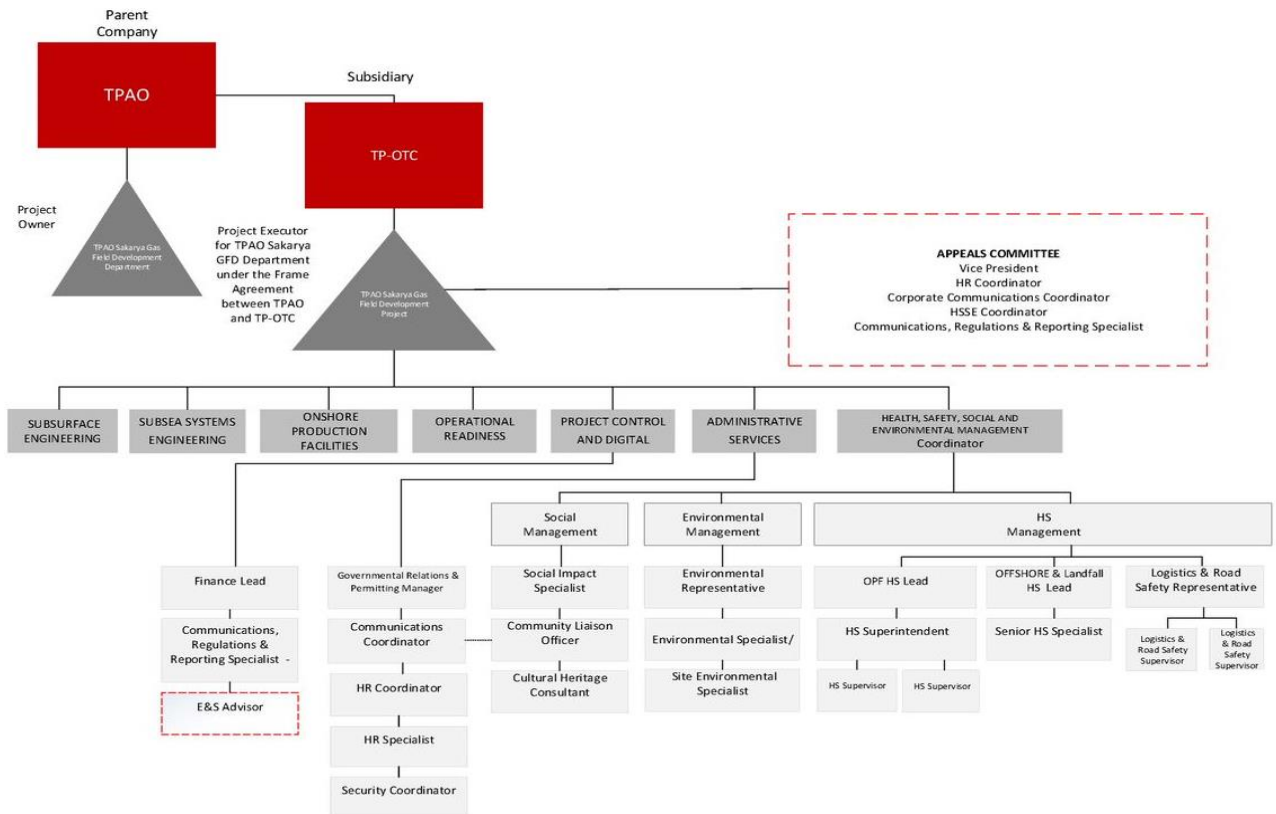
General Category of Status of Grievance			
	<u>Open</u>	<u>Closed</u>	<u>Total</u>
Social Impact/Sosyal Etki	5	91	96
Environmental Impact/Çevresel Etki	0	7	7
Compliance Impact/Uygunluk Etkisi	0	0	0
Community Security/Toplum Güvenliği	0	3	3
Human Rights/İnsan Hakları	0	0	0
Total/Toplam	5	101	106

The complaints received are grouped under five sub-headings: social impact, environmental impact, harmonization impact, community security and human rights. When the Social Impact Sub-Categories were examined, the most common complaint was infrastructure damage with 44 complaints. This was followed by access to land and resources with 15 complaints, public health and safety with 13 complaints, damage to soil and crops with 12 complaints, lack of livelihood with 6 complaints, cultural heritage and expropriation with 3 complaints, and stakeholder management with 3 complaints. While 91 of the complaints about Social Impact have been resolved, 5 are open. Of the 7 environmental complaints, 6 are about noise and dust, and 1 is about the amount of water. All environmental complaints have been resolved. During the reporting period, 3 complaints regarding community safety impact were received. All 3 complaints are about villagers being warned by security for roaming along the river in areas close to the project site. All 3 complaints were closed.

7.0 ROLES AND RESPONSIBILITIES

Organization chart of the Project is given in below Figure;

Title:	Stakeholder Engagement Plan	Classification:	Public
DocID:	SC26-OTC-PRJ-PM-PLN-000003	Page:	64 of 74
Rev. :			



During the construction and operation phases of the Project, the following roles and responsibilities will be implemented by TPOTC.

Table 7-1: Roles and Responsibilities

Role	Detailed Responsibilities
Top Management	<ul style="list-style-type: none"> Managing the labour force, enhancing working conditions, providing resources for personnel training, and ensuring that performance assessments are being conducted;
Project Manager	<ul style="list-style-type: none"> Monitoring the correct and effective implementation of this SEP Overall responsible for ensuring the implementation of all environmental and social management plans Ensure the financial and required human resources required for the implementation of ESMS Assist the site manager and CLO when required
Site Manager	<ul style="list-style-type: none"> Ensure the implementation of all ESMS, including the SEP Monitor the performance of the Contractors

Role	Detailed Responsibilities
	<ul style="list-style-type: none"> ● Monitor the weekly reports of the CLOs and the grievance records
Site Environment, health, and safety (HSE) Specialist/ Manager	<ul style="list-style-type: none"> ● Monitors relevant legislation and update the current ESMS according to the actual legislation ● Conduct internal audits/site audits ● Manage external audits ● Determines corrective measures if necessary ● Identifies the need for OHS and Environmental training ● Ensures that checks and audits on equipment, machinery and materials are periodically conducted and that records and archives are kept and ready to be presented to the authorities ● Checks the OHS records and performance reviews of contractors ● Checks the Environmental records and performance reviews of contractors ● Examines the environmental management plans and preparations ● Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained
Corporate Communication Manager	<ul style="list-style-type: none"> ● Review the Grievance tracking system weekly ● Prepare monthly reports on the grievances and the stakeholder engagement activities monthly ● Report to Project manager ● Work in cooperation with other departments to determine targets for Environmental, Social, health and safety issues
Social Impact Specialist	<ul style="list-style-type: none"> ● Ensure all complainants are informed within one week and complaints are resolved within one month; ● Provide regular reporting back to the community on community grievances; ● Record all formal and informal engagement activities with local communities and relevant all stakeholders. This will include interactions with committee fisheries and relevant stakeholders. ● Monitoring of the Contractors of the associated facilities



Role	Detailed Responsibilities
	<ul style="list-style-type: none"> ● Monitor and record the social responsibility activities carried out in the scope of the Project, ● Organizing stakeholder meetings if needed. Regular feedback to the stakeholders about the result of their grievances through Closing Form within 30 calendar days (Complainants who have provided their names and contact info will be notified within seven days that the grievance solution process has started). ● Keeping the record of the grievances in the Grievance Database with details (raised by who, date, status (open, awaiting or closed) etc.); ● Supporting HSE Manager on the first evaluation of the relevance of grievances collected ● Ensure all complainants are informed within one week, and complaints are resolved within one month ● Provide regular reporting back to the community on the community grievances
Spokesperson	<ul style="list-style-type: none"> ● Communicating with the media and public, ● Writing press releases ● Prepare presentations related with the Project
Community Officers Liaison	<ul style="list-style-type: none"> ● Record all formal and informal engagement activities with local communities in the stakeholder management system ● Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted into stakeholder engagement quarterly reports ● Monitor and record the social responsibility activities carried out in the scope of the Project, and these records will be inserted into stakeholder engagement quarterly reports ● Being in contact with stakeholder meetings to collect the responses to grievances actively
Subcontractor	<ul style="list-style-type: none"> ● Contractors/Subcontractors are responsible for not making any commitment in their interaction with the stakeholders beyond their competence. They will follow the rules listed in this SEP and other relevant management System documentation.

8.0 MONITORING

The stakeholder engagement process of the Project will be monitored periodically, as indicated in Table-below. According to the outputs of the monitoring indicators, the SEP will be updated, and the necessary corrective actions will be implemented during the different stages of the Project by CLO. The monthly summaries, statistics of the consultation activities and grievances will be provided to the top management by CLOs.

Monthly summaries will be used to assess:

- Transparency and accessibility of the engagement process;
- Provision of relevant information;
- Timeliness in responding (ongoing communication);
- Clarity and simplicity of the information provided;
- Project impacts; and
- Applicability and relevance of the information provided.

The SEP will be reviewed annually and updated according to the outputs of the monitoring process. The key performance indicators for an effective stakeholder engagement process that will be assessed during the monitoring process are presented below.

Table 8-1: Key Performance Indicators (KPIs)

ID	KPI	Target	Monitoring Measure	Frequency
Consultation and Information Disclosure				
SEP-KPI-01	Registration of stakeholder engagement	Target of 100%	Database	Weekly
SEP-KPI-02	Consultation records Materials shared with the stakeholders (brochure, presentations) Number of the meetings held Number of the participants who attended the public consultation meetings Visits to local authorities or other local stakeholders Frequency of the visits to the settlements affected by the Project Number of newspapers to share the information Any updates on the Project website Any type of announcements (information banners, calls)	Delivery of regular reports on the consultation activities 100%	Reporting	Weekly/Monthly

ID	KPI	Target	Monitoring Measure	Frequency
Implementation of Grievance Mechanism				
SEP-KPI-03	Number of community complaints/ grievances received	The total number reduced per year	Log/Database	Weekly
SEP-KPI-04	Percentage of complaints resolved in less than 30 days	70%	Log/Database	Monthly
SEP-KPI-05	Percentage of conflicts and social tensions resolved per total amount of conflicts and social tensions	100%	Log/Database	Weekly
SEP-KPI-06	Reporting back to stakeholders in the implementation of the grievance mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure 100%	Reporting	Monthly
SEP-KPI-07	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Biannual (construction), annual (operation) 100%	Audit report	Quarterly
SEP-KPI-08	Disclosure of Project's annual Environmental and Social Monitoring Report	Project's annual Environmental and Social Report will be disclosed	Annual Report	Annually
SEP-KPI-09	Legal Penalty	Zero Penalty (Penalties are given by the authorities in case of non-compliance.)	Reporting	Monthly

9.0 DOCUMENTATION AND REPORTING

9.1 Documentation

Stakeholder engagement activities will be documented and filed to ensure accountable delivery of this SEP and open reporting. The following documentation will be used and maintained by the Company during pre-construction, construction, and operation phases:

- Stakeholder dialogue log,
- Meeting minute template,
- Stakeholder list,
- Grievance log,
- Media monitoring.

Records will be reviewed on a monthly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

9.2 Reporting

9.2.1 Internal Reporting

During construction monthly reports will summarize all activity for the period and provide a summary of issues raised and how they have been addressed, including timeliness of responses and corrective and mitigation measures to address grievances and analysis of trends in audit activities Internal reporting will be performed biannually during the operation phase.

The Project will also have various detailed internal reporting and Social Management Team will provide input to these including activities realized, outcomes and feedback of stakeholders, grievance management. These include:

- Monthly reporting to top management
- Annual reporting to top management
- Other ad-hoc reporting requirements

9.2.2 External Reporting

The Social Management Team will be reviewed on a regular basis and revised as needed to reflect completed engagement activities and revise and confirm future engagement plans. During the Construction & Pre-Commission Phase, the Project will report regularly via its website and in local communities on Project progress, implementation of mitigation measures, compliance with ESMS and overall performance. During the Operational Phase, the Project will continue to provide updates as necessary. The Project anticipates providing information to stakeholders which will focus on non-routine activities, after an unplanned event or incident (if one occurs), or if there is a change to Company personnel who act as stakeholder focal points.



An annual reporting of SEP will be produced by Social Management Team and disclosed publicly, mainly through the website. It will also be shared with interested stakeholders electronically.



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STAKEHOLDER ENGAGEMENT PLAN

ANNEX A - GRIEVANCE FORM



 TÜRKİYE PETROLLERİ ANONİM ORTAKLIĞI	ŞİKAYET KAYIT FORMU	 OTC OFFSHORE TECHNOLOGY CENTER	Doküman No	GR.001
			Yayın Tarihi	
			Revizyon No	0
			Revizyon Tarihi	0
			Sayfa No	1
1- ŞİKAYETTE BULUNAN KİŞİYE İLİŞKİN BİLGİLER				
Ad Soyad: <small>Fişer isimiz olarak şikâyetle bulunmak istiyorsanız, lütfen SİMSİZ yazınız – Belirttiğiniz tüm görüşlerinizi dikkate alacağız.</small>		Tarih:		
İletişim Bilgisi		Şikâyet nasıl alındı?		
		<input type="checkbox"/> Şahsen		
		<input type="checkbox"/> Telefonla		
		<input type="checkbox"/> Dilekçe		
		<input type="checkbox"/> E-posta yoluyla		
<input type="checkbox"/> Diğer (Lütfen Belirtin)				
Adres:				
E-posta:		Telefon:		
2- ŞİKAYET HAKKINDA BİLGİ (Lütfen şikâyetiniz anlatınız)				
Şikâyet sahibi tarafından talep edilen çözümler				
Şikâyetin alındığı tarih ve Numarası Türü:				
Olay/Şikâyet Sıklığı	<input type="checkbox"/> Bir defa (şikâyet tarihi)			
	<input type="checkbox"/> Birden fazla (Kaç kez tekrarlandı?.....)			
	<input type="checkbox"/> Devam ediyor (Sorun hali hazırda sürüyor)			
Şikâyet Sahibinin Ad Soyad ve İmzası:		Kayıt Eden Kişinin Ad Soyad ve İmzası:		



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ANNEX B - GRIEVANCE CLOSURE FORM

 TÜRKİYE PETROLLERİ ANONİM ORTAKLIĞI		 OTC OFFSHORE TECHNOLOGY CENTER	
ŞİKAYET KAPANIŞ FORMU		Belge No	GR.001
		Yayın Tarihi	
		Revizyon No	0
		Revizyon Tarihi	0
		Sayfa No	1
Şikayet Kayıt Numarası	GR-		
Tarih			
Şikâyetin / Talebin Özeti			
Talep edilen acil eylemleri belirtiniz			
Talep edilen uzun dönem eylemleri belirtiniz			
Tazminat talep edildi mi?	Evet () Hayır ()		
FAALİYETİN DOĞRULANMASI VE SONLANDIRILMASI			
Aşamalar	Sonlandırılma Tarihi	Sorumlu Bölüm	
1			
2			
3			
GRIEVANCE / REQUEST COMPLETION			
Notlar:			
Tarih :			
Şikayette Bulunan Kişinin; Ad, Soyad ve İmza		TPAO/TP-OTC adına; Ünvan, Ad, Soyad ve İmza	

ANNEX C – SUB CATEGORY OF GRIEVANCES

Social Impact Sub Category	Environmental Sub Category	Compliance Impact Sub Category	Community Security Sub Category	Human Rights Sub Category
Livelihood	Natural hazards	Unauthorized clearing	Violence on site	Employee misconduct
Resettlement	Contamination - water	Third party risks	Breach of Human Rights	Vulnerability
Stakeholder engagement	Contamination - soil	Noncompliance with lender requirements	Company guards on site	Gender
Cultural heritage	Noise and dust			
Community health and safety	Landscape			
Employment	Poaching			
Workers' Health and Safety	Wildlife disturbance			
Community trust	Water quantity			
Procurement opportunities				
Damage to Animal				
Damage to House				
Damage to Land &Crop				
Access to the Lands and Resources				
Expropriation				
Damage to Infrastructure (Road etc.)				



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ANNEX D – ESIA FEEDBACK FORM

ESIA Feedback Form ÇSED Geribildirim Formu	
Name-Surname Ad-Soyad <i>If you prefer or request not to disclose your identity to third parties without your consent, you can remain anonymous.</i> <i>Kimliğinizi izniniz olmadan üçüncü şahıslara açıklamamayı tercih ederseniz veya talep ederseniz, anonim kalabilirsiniz.</i> Optional / Tercihe bağlı	
Address (Adres) <i>Province/District/Settlement</i> <i>il/ilçe/Yerleşim</i>	
Phone Number (Telefon numarası)	
Date (Tarih)	
Concerns, expectations, questions, or complaints on the ESIA report ÇSED raporu ile ilgili endişeler, beklentiler, sorular veya şikayetler	