



## **POLAT MAKİNA SANAYİ VE TİCARET ANONİM ŞİRKETİ**

**INVESTMENT LOAN WITHIN THE SCOPE OF FINANCE OF  
SUPERCRITICAL FLUID EXTRACTION SYSTEM PROJECT,  
ROOFTOP SPP INVESTMENT AND WORKING CAPITAL  
REQUIREMENTS**

**GRIEVANCE REDRESS MECHANISM**

**CNR-PLN-PLT-GRM-001**

**MARCH 2024 – (Rev.01)**



**Bağlıca Mah. Çambayırı Cad. Çınar Plaza No:66/5 06790 Etimesgut/ ANKARA**

**Tel: +90 312 472 38 39 Fax: +90 312 472 39 33**

**Web: [cinarmuhendislik.com](http://cinarmuhendislik.com)**

**E-mail: [cinar@cinarmuhendislik.com](mailto:cinar@cinarmuhendislik.com)**

**All rights of this report are reserved.**

All or part of this report cannot be reproduced, copied, electronically reproduced, traded, transmitted, sold, rented, used for any purpose, or used in any form and method in digital and/or electronic media without written permission from Çınar Engineering Consultancy Inc. as per the Law No. 5846 on Intellectual and Artistic Works amended with the Law No. 4110.

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 1 / 18

### DOCUMENT REVISION HISTORY SHEET

Rev.	Date	Prepared by	Checked by	Approved by	Description
00	27.03.2023	Özge ÇELİK	Ezgi DODAK AYKUT	Ayşe CANBAZ AKKURT	Prepared as the first publication by Çınar Engineering Inc. (ÇINAR).
01	01.03.2024	Özge ÇELİK	Seda ÇİĞDEM	Ayşe CANBAZ AKKURT	Expanding and revising the scope of the plan as different activities are included in the scope of new loan acquisition.

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 2 / 18

## TABLE OF CONTENTS

TABLE OF CONTENTS .....	2
LIST OF TABLES .....	3
LIST OF FIGURES .....	3
ABBREVIATIONS & DEFINITIONS .....	4
1. INTRODUCTION .....	5
1.1 Non-Technical Summary of the Project .....	5
1.2 Project Location .....	6
1.3 Objective and Scope .....	8
2. LEGAL FRAMEWORK .....	9
3. GRIEVANCE REDRESS MECHANISM .....	11
3.1 Workers' Grievance Redress Mechanism .....	11
3.2 Information and Disclosure Methods .....	12
3.3 Communication Channels .....	12
3.3.1 Official Website .....	13
3.3.2 Telephone Hotline, Mailing Address and Addresses .....	13
3.3.3 CİMER .....	14
3.3.4 Public Relations Office .....	14
3.4 Reference Documents .....	14
3.5 Receiving and Recording Complaints .....	14
3.6 Evaluation and Solution Process.....	15
3.7 Closing the Complaint .....	16
3.8 General Evaluation of Grievances.....	16
3.9 Flow Diagram and Forms .....	16

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 3 / 18

## LIST OF TABLES

Table 1. Closest Settlements to the Project Area.....	6
Table 2. Corporate Websites.....	13
Table 3. Corporate Contact Information.....	13

## LIST OF FIGURES

Figure 1. Satellite Image of the Project Area .....	7
Figure 2. Request Boxes .....	11
Figure 3. Grievance Registration Form.....	16
Figure 4. Grievance Closure Form.....	17
Figure 5. Grievance Mechanism Flow Diagram .....	18

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 4 / 18

## ABBREVIATIONS & DEFINITIONS

<b>Polat Makina, Project Owner, or Investor</b>	: Polat Makina Sanayi ve Ticaret Anonim Şirketi
<b>Astim OIZ or OIZ</b>	: Astim Organized Industrial Zone
<b>TKYB or Bank</b>	: Development and Investment Bank of Türkiye
<b>SPP</b>	: Solar Power Plant
<b>WB</b>	: World Bank
<b>ESAP</b>	: Environmental and Social Action Plan
<b>IFC</b>	: International Finance Corporation
<b>PSs</b>	: Performance Standards
<b>E&amp;S</b>	: Environmental and Social
<b>KfW</b>	: Reconstruction Credit Institute (In German: Kreditanstalt für Wiederaufbau)
<b>WBG</b>	: World Bank Group
<b>ÇINAR or Consultant</b>	: Çınar Engineering Consultancy Inc.
<b>EHS</b>	: Environmental Health and Safety
<b>GRM</b>	: Grievance Redress Mechanism
<b>SEP</b>	: Stakeholder Engagement Plan
<b>ESF</b>	: Environmental and Social Framework
<b>PSs</b>	: Performance Standards
<b>ILO</b>	: International Labor Organization
<b>CLO</b>	: Community Liaison Officer
<b>HR</b>	: Human Resources
<b>CIMER</b>	: Presidential Communication Center

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 5 / 18

## 1. INTRODUCTION

### 1.1 Non-Technical Summary of the Project

Polat Makina Sanayi ve Ticaret Anonim Şirketi (Polat Makina, Project Owner, or Investor) is conducting production activities in Aydın province, Efeler district, Astim Organized Industrial Zone (Astim OIZ or OIZ) in the subjects of continuous system olive oil machines, pomace extraction machines, milk cleaning separator, cream separator, industrial decanter, industrial separator (centrifuge) (hereinafter referred to as "Centrifuge Sector").

The Project Owner has planned to construct a facility for its activities within the scope of the Supercritical Fluid Extraction System Project (hereinafter referred to as the "Supercritical Sector") within the scope of the "Technology Oriented Industrial Move" program supported by the Ministry of Industry and Technology. Therefore, it has signed a loan agreement with the Development and Investment Bank of Türkiye (TKYB or Bank) on 08.12.2022 to be used for building-construction and machinery and equipment investments. The term of this loan is determined as 1+5 years. Later, following the completion of the construction phase of the planned project, the Project Owner planned a Solar Power Plant (SPP) on the facility's roof. For this project (Rooftop SPP Project), in 2023, they secured a new credit with a 5-year term financed by TKYB and a 3-year term as an Operating Loan under the scope of Financing the Working Capital Needs.

In this context, the Project Owner should comply with the requirements of the Environmental and Social Action Plan (ESAP) prepared by the TKYB in line with the World Bank (WB) standards as one of the conditions of the loan; International Finance Corporation (IFC) Performance Standards (PSs), WB E&S Standards, Reconstruction Credit Institute Development Bank (KfW Development Bank) Sustainability Guideline directives, and Republic of Türkiye regulatory frameworks, World Bank Group (WBG) general and sector-related Environment, Health, Çınar Engineering Consultancy Inc. (ÇINAR or Consultant) has been appointed as a consultant to carry out Environmental and Social (E&S) monitoring studies in line with the Environmental Health and Safety (EHS) Guidelines and the implemented International Industry Practices.

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Date: MARCH 2024	Page 6 / 18

## 1.2 Project Location

Following the completion of the building construction phase of the Supercritical Sector Project, the Centrifuge Sector activities, which were in operation at a different address in Astim OIZ, were moved here and united under the same roof with the Supercritical Sector. The Project Owner plans to implement a SPP Project on the roof of the facility, and official procedures have been initiated in a short time.

Located in Aydın province, Efeler district, Astim OIZ, the Project activity area is planned as a 25,000 m<sup>2</sup> closed area and 3,000 m<sup>2</sup> administrative building on an area of 50,000 m<sup>2</sup> located on block 803, parcel 51, owned by the Project Owner. Satellite image of the Project Area is shown in Figure 1 and information about the closest settlements to the Project Area is given in the Table 1.

The Project Impact Area will be Aydın Astim OIZ, primarily the Project Area and its surroundings, where environmental and social impacts are directly monitored. The OIZ area is formed by three (3) administrative borders Aydın Municipality borders, Aydın Municipality Kocagür Village adjacent area and Tepecik Municipality borders.<sup>1</sup>

"Regional Level", Aydın province and Efeler district of Aydın province is the area where the environmental and social impacts of the Project will be indirectly observed and will mostly host the secondary stakeholders of the Project.

The "National Level", which is deemed necessary to be defined due to the supply chain addressed by the Project and the positions of the buyers in the market, is Türkiye, and the area outside Türkiye is used as the "International Level" without specifying the country.

**Table 1. Closest Settlements to the Project Area**

Facility Name	Closest Settlement (Household)	Location According to the Facility	Air Distance (m)
Polat Makina Sanayi ve Ticaret A.Ş.	Ata Neighborhood	Batı	800
	Tepecik Neighborhood	Güney	700

<sup>1</sup> Aydın Astim OIZ Information. <http://www.astimosb.org.tr/tr/kurumsal/hakkimizda>



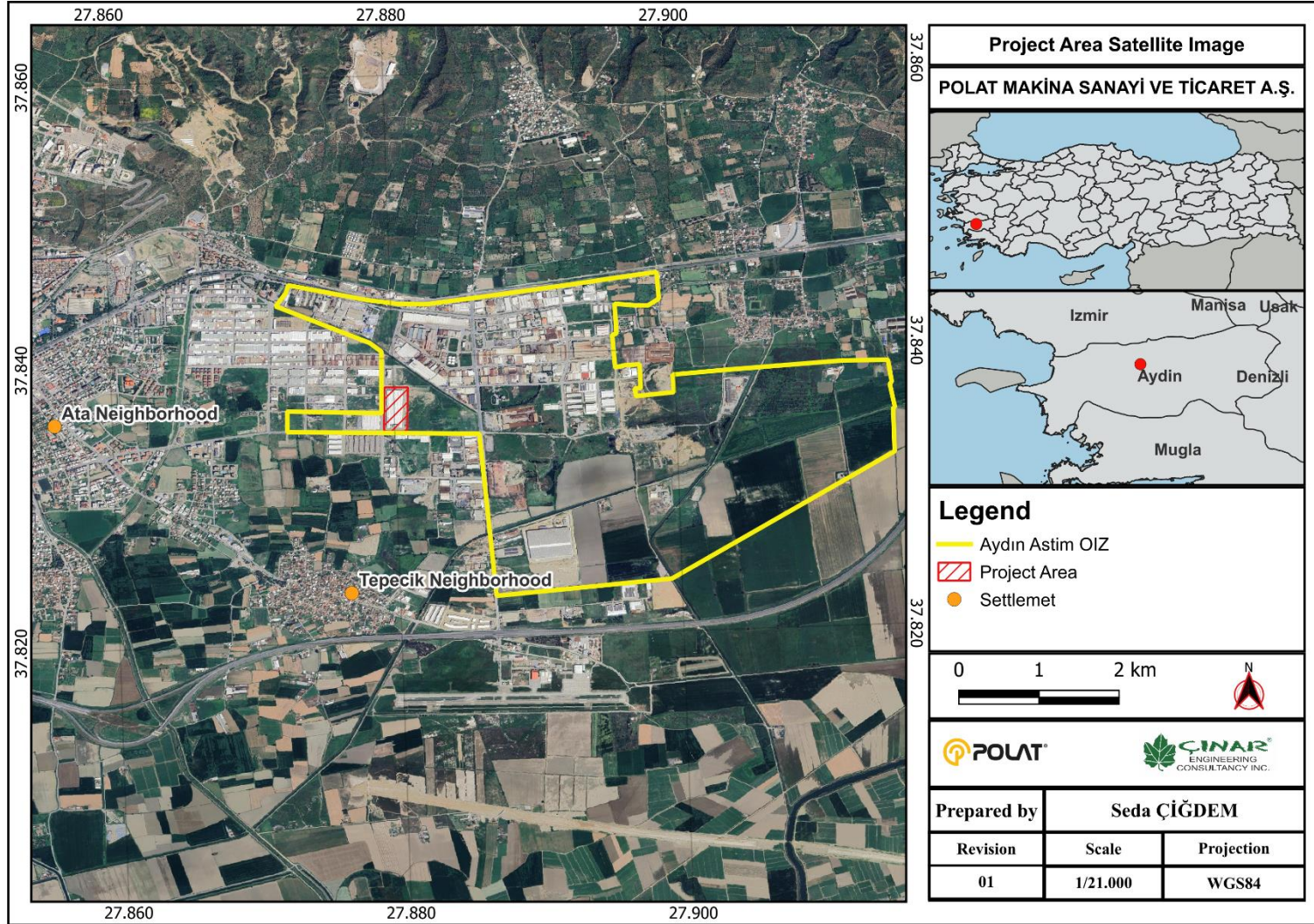


Figure 1. Satellite Image of the Project Area

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 8 / 18

### 1.3 Objective and Scope

This Grievance Redress Mechanism (GRM) has been prepared as one of the implementation tools of the Stakeholder Engagement Plan (SEP) and its purpose is to provide guidance on how to manage the communication and interaction processes required to be established between the Project owners and stakeholders and interest groups that may be directly and/or indirectly affected by the Project for the Centrifuge & Supercritical Sector activities conducted by the Project Owner and ÇINAR for the Rooftop SPP Project.

As one of the implementation tools of the SEP, the GRM, which covers internal and external stakeholders under separate headings, serves this purpose by collecting complaints, opinions, suggestions, feedback, and questions on environmental and social impact.

The Construction Period Environmental and Social Monitoring Plan, which was developed as interconnected documents, aims to ensure the compliance of the Project in terms of human and environmental health in the context of human rights, together with SEP and GRM.

This GRM has been prepared for stakeholders who are/may be affected by the Project, directly or indirectly, positively and/or negatively in environmental and social aspects, and/or for stakeholders in other relevant parties who may be interested in the Project.

The stakeholder engagement dimension of the Project is presented in detail in "Table 5: Stakeholder Action Plan" within the SEP in line with international standards and national legislation (project standards). The issues listed below are also explained and analyzed in detail in the SEP:

- Roles and Responsibilities
- Information and Disclosure Methods
- Identification of Internal and External Stakeholders
- Sensitive Groups
- Monitoring and Reporting
- Training Programs and Seminars

Details on the GRM established under the SEP are presented in "Section 3: Grievance Redress Mechanism" of this report.

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 9 / 18

## 2. LEGAL FRAMEWORK

The legal framework applicable to the conduct of the GRM is listed below:

- German Development Bank (KfW) Standards
- KfW Development Bank Sustainability Guideline-Assessment and Management of Environmental, Social, and Climate Aspects: Principles and Procedures (2023)
- WB Environmental and Social Framework (ESF)
- WBG General Environment, Health and Safety Guidelines
- WBG Sectoral Environment, Health and Safety, Metal, Plastic and Rubber Products Manufacturing
- IFC Performance Standards (PSs)
- TKYB Environmental and Social Policy

The executive agency is responsible for conducting a meaningful engagement and consultation process that provides affected persons and relevant stakeholders with the opportunity to express their views and concerns about project risks, impacts, and proposed mitigation measures. At the same time, the process should allow the executive agency to consider and react to these views.

Establish a grievance process for the FC-measure so that it can deal with the concerns and complaints of affected public employees and members. The procedure should be culturally appropriate and proportionate to the FC-measure. Complaints and their processing and resolution should be documented and included in the reports generated as part of reporting to KfW – German Development Bank.

The ESS requirements detailed in the WB ESF<sup>2</sup>, the stakeholder engagement process detailed in the "ESS10: Stakeholder Engagement and Disclosure of Information" standard includes the following items in summary:

- ESS10 applies to all projects supported through investment project financing.
- Stakeholder engagement is an inclusive process conducted throughout the project lifecycle.
- Stakeholder engagement is most effective when initiated at an early stage of the project.
- Effective stakeholder participation improves the environmental and social sustainability of projects, can increase project acceptance, and contributes significantly to successful project design and implementation.
- Open and transparent engagement between the project and stakeholders is a key element of good practice.

As a member of the WBG, IFC's PSs are aligned with the WB's ESF.<sup>3</sup>

PS1.29 and PS1.30 describe meaningful and effective information sharing processes, and in PS1.35, where the standards of the grievance mechanism for affected communities are given, the grievance mechanism is defined as follows: "In the case of Affected Communities, the customer shall express the Affected Communities' concern and concern regarding the customer's environmental and social performance." It will create a complaint mechanism to learn about complaints and help resolve them. The grievance mechanism should be proportionate to the risks and adverse impacts of the project and serve the Affected Communities. The grievance mechanism should aim to address concerns promptly, using a

<sup>2</sup> World Bank Environmental and Social Framework. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

<sup>3</sup> International Finance Corporation. Performance Standards.2012.

[https://www.ifc.org/wps/wcm/connect/Topics\\_Ext\\_Content/IFC\\_External\\_Corporate\\_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards](https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards)

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 10 / 18

culturally appropriate, accessible, understandable, and transparent consultation process. The party raising a concern or complaint should not face any costs or sanctions. The grievance mechanism should not be an obstacle to resorting to legal or administrative remedies. Customer will inform Affected Communities about the grievance mechanism during the stakeholder engagement process.

ESAP prepared by TKYB, which presents the project's loan requirements, budget and timeline and evaluation criteria, Environmental and Social Risk Assessment Procedure and Annexes in the Lending Process, IFC Performance Standards, International Labor Organization (ILO) Convention and national It was prepared in accordance with the legislation.

The Bank's mission; to work to meet the financing and consultancy needs of investors, to assist structural transformation in line with sustainable development priorities, and to contribute to the spread of capital to the base. In accordance with this purpose, the Bank's sustainability principles<sup>4</sup> are also applicable to this Project.

---

<sup>4</sup> TKYB, Sustainability Principles. June 2020. <https://kalkinma.com.tr/bizi-taniyin/cevreci-kalkinma/cevresel-ve-sosyal-politikalar>

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 11 / 18

### 3. GRIEVANCE REDRESS MECHANISM

The main goal for GRM is to collect complaints, opinions, suggestions, feedback and questions on environmental and social impact. The other goal is to collect complaints, opinions, suggestions, feedback, and questions from stakeholders in the internal stakeholder GRM for the participation of internal stakeholders and in the external stakeholder GRM for the participation of external stakeholders and evaluate them separately.

The main responsible people are the Project management, the Human Resources (HR) Department, the Community Liaison Officer (CLO) and the GRM executives. GRM coordinators are social experts with main GRM responsibility, HR staff for internal stakeholder GRM, and CLOs consisting of two persons (male and female) for external stakeholder GRM.

Polat Makina has a satisfaction survey application for customers and customer insight tracking is provided. The Project Owner has a database where records of the complaint redress mechanism created for customers are kept. The database kept includes product and customer details, definition of the problem, root cause analysis, preventive action and breakdowns showing the problem resolution status. Corrective actions are implemented based on customer feedback. According to this database;

- 5 of the 22 grievances received in 2020,
- 7 of the 14 grievances received in 2021,
- For 9 of the 15 grievances received in 2022;

Corrective and preventive actions were developed, but it was noted that the problem could not be resolved for the customer. In the 2023 data, only two (2) open customer complaints were reported.

During the meetings with the headmen, no complaints have been conveyed to the headmen for the last year and no negative issues have been brought up within the neighborhood. It was stated that they could contact them directly in case of a potential complaint. Local residents view the new factory positively, believe that local employment will increase, and declare their support for the project. Mukhtars stated that they will go to Polat Makina to provide food aid to low-income households and scholarship aid to students, as in previous years. Mukhtars can constantly communicate with the Project Owner.

#### 3.1 Workers' Grievance Redress Mechanism

There are complaint boxes in five (5) locations in the facility and those photographed during the site visit are given in Figure 2 . It has been declared by the Project Owner that the request boxes will be renewed. Request boxes located in the production area are also open to the use of main and subcontractor employees working in the construction area.

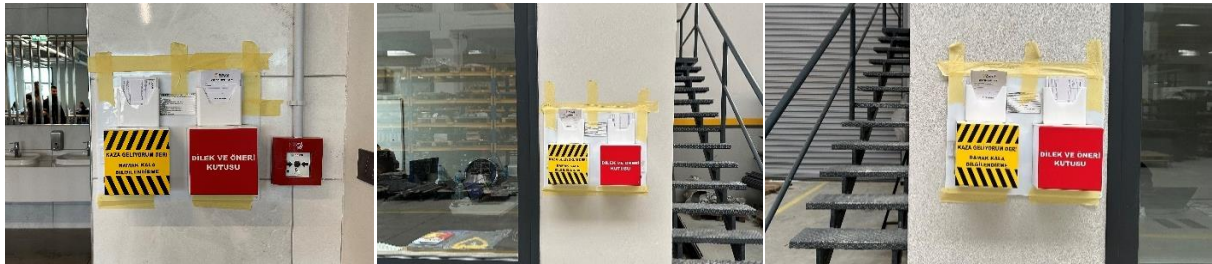


Figure 2. Request Boxes

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 12 / 18

The complaint form should be expanded to include the following sections:

- Name and contact information of the complainant,
- Date of complaint,
- The subject of the complaint,
- Complainant's solution proposal,
- Name and contact information of the person receiving the complaint and
- If necessary, contact information of the unit and person to whom the complaint will be transferred.

The complaint mechanism should be open to anonymous complaints, suggestions, and requests, and should also be accessible to subcontractor employees.

### 3.2 Information and Disclosure Methods

Information and clarification methods include printed and online informative documents and consultation meetings. These;

- Brochures, posters, flyers, etc. containing up-to-date information about the project, contractor, and facility. Introductory documents produced in the form of informative short notes
- Official website of the Project, where relevant documents are available online
- Current announcements on the official website of the Project
- Current announcements on the Project's social media accounts
- Notice boards containing warning and information notes on occupational and environmental health and safety and waste management to be placed in and around the facility
- Request, complaint and suggestion boxes to be placed in and around the facility
- Regular cooperation and consultation meetings with stakeholders on occupational and environmental health and safety and security and waste management
- Regular consultation meetings with local and regional institutions and organizations
- Cooperation and consultation meetings with relevant institutions locally and in the region regarding employment
- In-depth interviews and interviews
- Focus group meetings
- It includes items such as information and cooperation meetings that will cover the supply chain and potential buyers.

### 3.3 Communication Channels

The communication methods defined in the project owner's corporate communication plan for 2023 are listed as follows:

- Social media (linkedin, facebook, instagram)
- Website
- corporate magazine<sup>5</sup>
- Media and digital media channels (newspapers, sectoral magazines, television)
- intranet<sup>6</sup>
- Events (conference, seminar, webinar, university days)
- After-sales service (7/24)

<sup>5</sup>Polat Life and Polat Industrial

<sup>6</sup>Internal communication network

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 13 / 18

There is a corporate application called Polatinum that is currently used in internal stakeholder communication. Access to the platform is limited to employees and cannot be accessed from outside.

### 3.3.1 Official Website

A website (<https://www.polatas.com.tr/>) belonging to the project owner Polat Makina is available.<sup>7</sup> Current news covering Polat Makina and its group companies, and the official blog can be accessed via the website. Official accounts on YouTube and LinkedIn are also shared on the website.

Current news covering Polat Makina and its group companies, and the official blog can be accessed via the website. Official accounts on YouTube and LinkedIn are also shared on the website.

Corporate website addresses of the Project Owner are given in the Table 2.

**Table 2. Corporate Websites**

Header	Address	Contents
Polat Grup Holding	<a href="https://www.polatgroup.com.tr/">https://www.polatgroup.com.tr/</a>	Holding
Polat Makina	<a href="https://www.polatas.com.tr/">https://www.polatas.com.tr/</a>	Project Owner
Polat Extraction Technologies	<a href="https://polatextraction.com.tr/">https://polatextraction.com.tr/</a>	Project Owner
PGR Drive Technologies	<a href="https://www.pgr.com.tr/">https://www.pgr.com.tr/</a>	Technology / Corporate
NRW Drive Technologies	<a href="https://www.nrwdrivetechologies.com/">https://www.nrwdrivetechologies.com/</a>	Technology / Corporate
Polat Tarım	<a href="https://www.polattarim.com.tr/">https://www.polattarim.com.tr/</a>	Product / Corporate
Oya Fidancılık	<a href="https://www.oyafidancilik.com.tr/">https://www.oyafidancilik.com.tr/</a>	Product / Corporate
VetNaCare	<a href="https://www.vetnacare.com/">https://www.vetnacare.com/</a>	Product / Corporate
OlivaCat	<a href="https://www.olivacat.com/">https://www.olivacat.com/</a>	Product / Corporate

### 3.3.2 Telephone Hotline, Mailing Address and Addresses

Correspondence address, telephone and fax information, e-mail address and customer service number are shared on the website for stakeholder engagement activities. There is also a form on the same page that allows online communication<sup>8</sup>. Detailed contact information is given in the Table 3.

**Table 3. Corporate Contact Information**

Communication Channel	Information
<b>Address</b>	Ata Mah. Astim OSB 1.Cadde No: 6 Efeler, Aydın
<b>Telephone</b>	+90 256 231 04 73
<b>Fax</b>	+90 256 231 04 78
<b>E-mail</b>	info@polatgroup.com.tr polat@polatas.com.tr
<b>Polat Customer Services</b>	0 800 344 00 01

<sup>7</sup>Project owner website. <https://www.polatas.com.tr/>

<sup>8</sup> Project owner communication information.  
<https://www.polatas.com.tr/iletisim/>

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 14 / 18

### 3.3.3 CİMER

The Presidential Communication Center (CİMER)<sup>9</sup> and the ALO150 Direct Presidential Hotline<sup>10</sup> within the Presidency of the Republic of Türkiye's Directorate of Communications are available to stakeholders outside the Project. All stakeholders should be reminded that it is possible to use CİMER to submit complaints in stakeholder relations within the scope of the 2003 Law No. 4982 on the Right to Information<sup>11</sup>.

### 3.3.4 Public Relations Office

All stakeholders should be provided with face-to-face communication opportunities other than the communication channels given above. For this purpose, the social experts, and CLOs to be appointed should actively take part in field studies.

In addition to serving as a working area where blank complaint registration forms are provided and filled forms are received, the Public Relations Office should be the Project unit that will provide support in filling out the complaint form to people who can only submit complaints using face-to-face communication.

## 3.4 Reference Documents

Documents currently used, especially those regulating relations with internal stakeholders, are listed below. The documents used within the plans presented in the SEP are presented in detail with the Stakeholder Engagement Plan.

There is a Corporate Communication Procedure published in terms of corporate communication. The following issues are detailed in this procedure:

- Internal communication platforms and application principles
  - Internal communication meetings
  - Employee representative
  - Announcements
  - Social organizations
- External communication
  - Printed materials and publications
  - Web pages
  - Advertising works
  - Briefing, Interview and One-on-One Meetings
  - Social media

Customer Relations Unit Complaint/Request/Suggestion Processes have been determined and the relevant documentation has been prepared. A satisfaction survey has been created and used for customers.

## 3.5 Receiving and Recording Complaints

Social experts should be appointed as GRM executives, and these people should act together with the HR department and CLOs.

Complaints can be submitted using all of the communication channels provided above. Blank complaint forms will be transferred to an online system, saved, and edited. The initial registration process can be done by the social expert / CLO / HR department that receives the complaint form. In this sense, all communication channels should be designed in a way that

<sup>9</sup>Türkiye Cumhuriyeti Cumhurbaşkanlığı İletişim Başkanlığı Cumhurbaşkanlığı İletişim Merkezi. cimer.gov.tr

<sup>10</sup> ALO150 Doğrudan Cumhurbaşkanlığı Hattı. cimer.gov.tr

<sup>11</sup> Bilgi Edinme Hakkı Kanunu. Türkiye Cumhuriyeti Cumhurbaşkanlığı Mevzuat Bilgi Sistemi. <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.4982.pdf>



<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 15 / 18

can forward the complaint form to the relevant units. For example, a complaint submitted via e-mail should be appropriately forwarded to the HR unit and recorded in the GRM system. This should also include telephone, petition, CIMER, face-to-face communication, etc.

A copy of the complaint registration form should also be provided to the complainant. An appropriate complaint form should include the following:

- Name and contact information of the complainant,
- Complaint date,
- Complaint subject,
- Complainant's solution proposal,
- Name and contact information of the person receiving the complaint and
- If necessary, contact information of the unit and person to whom the complaint will be transferred.

If the subject of the relevant complaint is a public institution or organization other than the facility, the complainant should be guided on transferring the complaint to the relevant institution.

The complainant's solution proposal submitted with the form should be taken into consideration in the solution and evaluation process.

The complaint should be registered within one (1) business day from the moment it is submitted.

### 3.6 Evaluation and Solution Process

After all complaints submitted through all communication channels are recorded, the complainant should be contacted within two (2) working days. During this communication, information is provided to the complainant about the methods to be applied to resolve the complaint and it should be stated that the evaluation process will take place within ten (10) working days.

One of the important issues here is that all recorded data should be kept confidential in accordance with Article 20 of the Constitution of the Republic of Türkiye and the Law on the Protection of Personal Data<sup>12</sup>.

During the evaluation and solution process, environmental and social standards, performance standards, the Constitution of the Republic of Türkiye and the Bank's sustainability principles, which are comprehensively stated in the SEP, are taken into consideration and a process compatible with the SEP is followed.

A maximum of thirty (30) working days should be targeted for the solution process. Within this period, a proposal appropriate to the complaint should be submitted. The solution produced should remain within the framework of respect for personal rights and satisfy the complainant.

Action should be taken after mutual agreement is reached on the solution proposal offered to the complainant.

If agreement cannot be reached on the solution proposal, the complainant should be informed that the right to apply to legal channels is reserved.

<sup>12</sup> Personal Data Protection Law. Republic of Türkiye Presidency Legislation Information System. <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.6698.pdf>

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 16 / 18

### 3.7 Closing the Complaint

After the agreed solution proposal is processed, it is saved in the system with its results. All documents subject to the complaint and a copy of the transactions carried out during the resolution process are transferred to the complaining party and the complaint is closed with a memorandum of understanding.

### 3.8 General Evaluation of Grievances

In accordance with Article 20 of the Constitution of the Republic of Türkiye and the Personal Data Protection Law, the recorded data is anonymized and reported and used as a basis for the management of similar processes. This base, which can be called a complaint classification or analysis system, will accelerate the operation as a tool in reducing the environmental and social negative effects of the Project and improving the positive effects. The Project's relations with stakeholders can be strengthened by accelerating the evaluation and implementation processes of complaints and requests on similar issues.

### 3.9 Flow Diagram and Forms

The flow diagram presented to summarize the functioning of the grievance redress mechanism (Please see Figure 5) and the drafts for the grievance registration form (Please see Figure 3) and grievance closure form (Please see Figure 4) to be used in the process are presented below in Turkish.

KAYIT FORMU			
Kayıt No:		Tarih:	
Başvuru Sebebi	<input type="checkbox"/> Şikayet	<input type="checkbox"/> İstek / talep	<input type="checkbox"/> Soru
Başvuru Alma Yöntemi	<input type="checkbox"/> Telefon	<input type="checkbox"/> Dilekçe / Form	<input type="checkbox"/> E-posta
<b>Başvuran Bilgileri</b>			
İsim ve Soyisim			
İletişim Bilgileri	<input type="checkbox"/> Telefon <input type="checkbox"/> Adres <input type="checkbox"/> E-posta		
İletişim Tercihleri	<input type="checkbox"/> Adrese bildirim <input type="checkbox"/> Telefon <input type="checkbox"/> E-posta <input type="checkbox"/> Yüzyüze		
Başvuruya Konu Olan Olayın Detayları			
Konu şikayet ise şikayetçinin çözüm önerisi			
Kayıt Alan Birim Bilgileri			

Figure 3. Grievance Registration Form

<b>GRIEVANCE REDRESS MECHANISM</b>		<b>CNR-PLN-PLT-GRM-001</b>
Rev.01	Tarih: MARCH 2024	Sayfa 17 / 18

<b>ŞİKAYET KAPATMA FORMU</b>			
<b>Kayıt No:</b>		<b>Tarih:</b>	
<b>Başvuru Sebebi</b>	<input type="checkbox"/> Şikayet	<input type="checkbox"/> İstek / talep	<input type="checkbox"/> Soru
<b>Başvuru Alma Yöntemi</b>	<input type="checkbox"/> Telefon	<input type="checkbox"/> Dilekçe / Form	<input type="checkbox"/> E-posta
<b>Başvuran Bilgileri</b>			
<b>İsim ve Soyisim</b>			
<b>İletişim Bilgileri</b>	<input type="checkbox"/> Telefon <input type="checkbox"/> Adres <input type="checkbox"/> E-posta		
<b>İletişim Tercihleri</b>	<input type="checkbox"/> Adrese bildirim <input type="checkbox"/> Telefon <input type="checkbox"/> E-posta <input type="checkbox"/> Yüzyüze		
<b>Başvuruya Konu Olan Olayın Detayları</b>			
<b>Konu şikayet ise şikayetçinin çözüm önerisi</b>			
<b>Kayıt Alan Birim ve Kişi Bilgileri</b>			
<b>Aksiyon Bilgileri</b>			
	<b>Tarih</b>	<b>Açıklama</b>	<b>Sonuç</b>
1)			
2)			
3)			
<b>Şikayeti Kapanan Birim Bilgileri</b>			
<b>Notlar</b>			

Figure 4. Grievance Closure Form

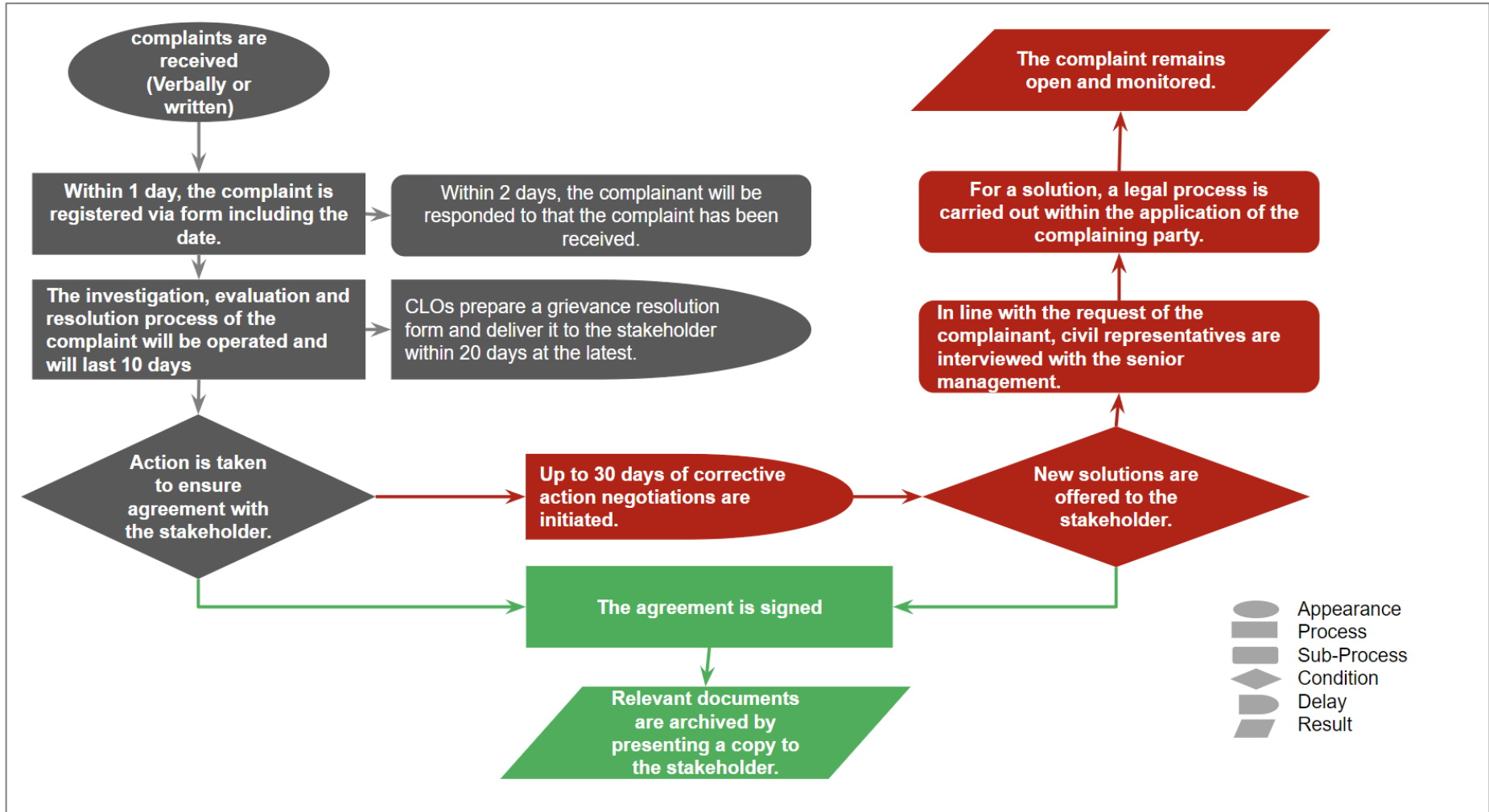


Figure 5. Grievance Mechanism Flow Diagram