



SASA Polyester Inc. Purified Terephthalic Acid (PTA) Production Plant Project

Stakeholder Engagement Plan (SEP) (Plan no: SASA-PLN-SOC-001)



**MGS PROJECT CONSULTANCY
ENGINEERING TRADE LIMITED CO.**

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1 INTRODUCTION

1.1 Background

SASA Polyester Inc. (hereinafter called as “SASA” or “Project Owner”) is planning to realise Pure Terephthalic Acid (PTA) Production Plant in Adana Province, Seyhan District, Sarıhamzalı Neighbourhood. The size of the area where the project will be carried out is 34.86 ha and the entire area is owned by SASA.

It is aimed to produce raw materials with PTA production in the facility planned to be built on the land on the southern border of SASA's existing facilities.

This Stakeholder Engagement Plan (SEP) has been produced to contribute to the studies conducted to assess the Environmental and Social Impacts of the Project as per the IFC Performance Standards (IFC PSs). The SEP was prepared for the construction and operation phases of the project in line with IFC PS 1 and EBRD PR 10 requirements. The SEP identifies target groups and the specific range of engagement activities required for each group.

It is important that particular effort is made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes.

Stakeholder identification is an on-going process and will require regular review and update.

1.2 Project Description

The Project is located in Seyhan District of Adana Province at the East Coastal Mediterranean Region of Turkey.

The Energy Transmission Lines of the Project and their functions are provided below:

The energy demand of the Project is met by two separate Energy Transmission Lines (ETL); one is in operation since 1960s and the other one is under construction at the moment. That is; the Project is to be connected to the grid via following ETLs:

- Existing 154 kV, 477 MCM, 6.2 km Zeytinli Substation - SASA Substation ETL, including 1 km underground cable in the boundaries of SASA PTA Project area, and
- 154 kV, 1272 MCM, 14.2 km Güney Adana Substation - SASA Substation ETL, which is under construction.

The Project does not include the construction and operation of 154 kV, 477 MCM, 6.2 km Zeytinli Substation - SASA Substation ETL and underground cable, since subject ETL and underground cable already exist. Therefore only 154 kV, 1272 MCM, 14.2 km Güney Adana



Substation - SASA Substation ETL which is subject to construction and operation phases is included in the scope of the associated facilities of the Project.

Besides, as a part of PTA Project, there is a temporary campsite for accommodation of the construction workers which is located on the south border of the SASA.

The location of the subject ETL and construction campsite is indicated in Figure together with the SASA Project area.



Figure 1-1. Location of the ETL, Construction campsite and SASA PTA Project area

The Area of Influence (AoI) for the social topics assessed in the ESIA Report is determined based on the following factors:

- Proximity of the settlements to the Project site and its components.
- Neighborhoods with landlords of the Project site.

Regarding the mentioned factors, the settlements fall within the social scope of this report are Büyükdikili, Gölbaşı, Kavaklı, Küçükdikili, Sarıhamzalı, Mekan, Söğütlü, Yeşiloba, Sarıhuğlar and Yolgeçen Neighborhoods. The distances of the mentioned settlements to the Project site are given in Table 1-1.

Table 1-1 The Settlements around the Project Area

Name of the Settlement	Distance to Project Area (m)
Sarıhamzalı Neighborhood	1566
Kavaklı Neighborhood	1296
Yolgeçen Neighborhood	1617
Küçükdikili Neighborhood	1758
Mekan Neighborhood	1075
Söğütlü Neighborhood	1310
Gölbaşı Neighborhood	3130
Yeşiloba Neighborhood	3752
Büyükdikili Neighborhood	3366



Figure 1. Social Study Area

The neighborhoods in the scope of this social study and the distances of nearest sensitive receptors are given in Figure 1. Boundaries of PTA Production Plant Project Area, temporary campsite and, temporary storage area which are possessed to SASA are indicated with blue lines in Figure 1.

The EIA report was prepared and submitted to Ministry of Environment, Urbanisation and Climate Change and final EIA Positive Decision has been taken.

1.3 Scope

This document is applicable to all activities resulting from the Project, including those associated facilities and all Contractors during both construction and operational phases of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan, after getting approval by SASA.

1.4 Purpose

The purpose of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to be applied during engagement with the stakeholders.



The purpose of this Plan is:

- Identifying all stakeholders and their interest to the Project,
- Defining the scope of stakeholder engagement and setting out applicable management interfaces,
- Defining roles and responsibilities,
- Outlining the applicable Project Standards relevant to this Plan,
- Defining Project commitments and procedures relevant to this Plan,
- Defining monitoring requirements of stakeholder engagement activities and
- Defining training requirements,
- Setting out references for supporting materials and information.

This Plan aims;

- To define stakeholders,
- To describe the most effective methods by:
 - Keeping the management of construction and operation fully informed on the issues related to external affairs and concerns,
 - Establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
 - understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.
- To establish long term relations between SASA and local communities based on mutual trust and transparency,
- To ensure that stakeholders have access to information on the Project, investments, construction works and operation activities in a timely manner and that disclosed information and date are fully understandable for the targeted groups and that access to consultation locations is available for all,
- To ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and,
- To ensure that all relevant parties have been engaged and no group has been excluded.

1.5 Definitions

- **Project Affected People:** Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other



fixed or moveable asset, either in full or in part, permanently or temporarily.

- **Stakeholder:** Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
- **Vulnerable People:** People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.
- **Associated facilities:** facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist.
- **Good international practice or GIP:** the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise will be that the project employs the most appropriate techniques and standards in the project-specific circumstances.
- **Mitigation hierarchy:** the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise will be that the project employs the most appropriate techniques and standards in the project-specific circumstances.
- **Project:** the set of works, goods, services and/or business activities defined in the



financing agreements and for which EBRD financing is sought by a client, and approved by EBRD Board of Directors or, if the Board of Directors has delegated the approval authority, by Bank management.

- **Social:** issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making.

1.6 Abbreviation

CR	Community Relations
CRF	Complaint Register Form
DCC	Document Control Center
EGMP	Grievance Mechanism Procedure (External)
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSS	Environmental, Health and Safety and Social
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
HR	Human Resources
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
KPI	Key Performance Indicator
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
PPM	Public Participation Meeting
PR	Performance Requirement
PS	Performance Standards
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff



2 KEY PRINCIPLES, ROLES AND RESPONSIBILITIES

The SEP will be implemented by relying on the following key principles for all the Project related comments, issues and complaints internally and externally.

2.1 Roles and Responsibilities

Principal roles and responsibilities for the implementation of this plan are outlined below:

Table 2-1 Key Roles and Responsibilities

Roles	Description and Responsibilities
General Manager	<p>Approves this Plan</p> <p>Ensures that this SEP implemented</p> <p>Determines policies and targets</p> <p>Appoints the Management Representative and ensures the Management Representative is aware of his / her responsibilities</p> <p>Evaluates the reports provided by Management Representative and ensures necessary actions were taken</p> <p>Provides necessary resources for proper implementation</p>
Construction Manager / Project Manager	<p>Coordinates with parties for proper implementation of this SEP</p> <p>Makes periodic inspections of the performance of Contractors of its operations during the construction phase</p> <p>Reports to the General Manager about system performance</p> <p>Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked</p> <p>Works in cooperation with other departments in order to determine targets for Environmental, Social and HS and resource efficiency issues</p> <p>Determines the project info and social budget of the project</p> <p>Making the final decision concerning internal / external grievances (if needed) in the light of the assessments of Social Responsibility Staff and HSE Manager</p>



<p>Social Responsibility Staff (SRS)</p>	<p>Keeps the records of the complaints / suggestions in the Grievance Database with details (raised by who, date, status etc.)</p> <p>Supports HSE Manager on the first evaluation of the relevance of grievances collected</p> <p>Shows best efforts to resolve all complaints in one month</p> <p>Provides regular reporting back to the community on the management related to community grievances</p> <p>Records all formal and informal engagement activities with local communities in Stakeholder Management System</p> <p>Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports</p> <p>Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports</p> <p>Forms relationships with the Project stakeholders</p> <p>Organizes stakeholder meetings to collect the responses to grievances actively as required</p> <p>Gives the feedback to the stakeholders about the results of their grievances through External Grievance Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed).</p>
<p>Health Safety and Environment (HSE) Department</p>	<p>Determines the national and international legislations that are applicable to the Project activities and informs the Operation / Project Manager</p> <p>Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances</p> <p>Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the construction stage and to audit the performance of the Contractors</p>



<p>Health Safety and Environment (HSE) Department</p>	<p>Determines and provides the necessary training materials for employees</p> <p>Provides answers to the OHS, environment and social grievances raised by employees, the local community and local institutions</p> <p>Helps SRS for keeping the record of the complaints / suggestions in the Grievance Database with details</p> <p>Supports SRS on the first evaluation of the relevance of grievances collected</p> <p>Supports SRS for recording all formal and informal engagement activities</p> <p>Conducts internal audits / site audits</p> <p>Determines corrective measures if necessary</p> <p>Identifies the need for OHS and Environmental trainings</p> <p>Checks the Environmental records and performance reviews of Contractors</p> <p>Examines the HSE response plans and preparations</p> <p>Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained</p> <p>Implements the Plan</p>
<p>Contractors / Subcontractors</p>	<p>Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence</p> <p>Follows the rules listed in this SEP and other relevant Management System documentation of SASA.</p>



3 PROJECT STANDARDS

The implementation and the procedure of this plan developed for the Project will comply with the related national and international requirements and standards. The Project standards involves:

- applicable Turkish Standards,
- Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- applicable international standards and guidelines,
- applicable SASA standards, policies and procedures.

3.1 Applicable Turkish Standards

I. THE CONSTITUTION OF THE REPUBLIC OF TURKEY

“The Constitution of the Republic of Turkey” 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:

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 his thoughts and opinions for any reason or purpose nor shall anyone be blamed or accused on account of his thoughts and opinions.

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 in 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.

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.



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 shall take supportive and promotive measures towards that end.

VII. Right of Petition

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

II. 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.

III. LAW ON THE RIGHT TO INFORMATION

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

IV. LAW ON THE USE OF RIGHT PETITION

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

V. EXPROPRIATION LAW

Another Law related to the involvement of stakeholders to 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, authorization, procedure, reason and 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 Environmental Law, citizens as well as the State bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (25.11.2014, OG No. 29186 amended 09.02.2016, 26.05.2017).

The Projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003, 2008 and finally the last EIA Regulation came into force on November 25th, 2014 and its latest amendment occurred on 26.05.2017.

In accordance with Turkish Republic Ministry of Environment, Urbanisation and Climate Change, Environmental Impact Assessment (“EIA”) Regulation (Official Gazette Nov. 25, 2014; No: 29186), relevant requirements in relation with EIA Process have been disclosed to the public.

The "EIA Positive Decision" has been taken.

3.2 Applicable International Standards and Guidelines

International standards to be observed by the Project are the IFC Performance Standards and EBRD – Guide to Performance Requirement 10; Information Disclosure and Stakeholder Analysis, EBRD Environmental and Social Policy 2019.

In particular, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement.

Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties having an effect on, having been affected by, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them;
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it;
- To review this database in consultation with relevant parties;
- To provide necessary information and consultancy services to all stakeholders in order



to facilitate their required contributions on the environmental and social issues that may affect them; and

- To continuously protect respectful and constructive relations with stakeholders on the basis of mutual confidence and honesty, and by respecting the values of the stakeholders.

Basic requirements of international standards and guidelines are as follows:

- Description of stakeholders,
- Preparation of a Stakeholder Engagement Plan,
- Provision of necessary information about the Project and operation to the communities that have been affected or potentially to be affected,
- Provision of significant consultancy services by means of early and continuous engagement,
- The grievance and feedback mechanism aiming at concerns, complaints, requests and demands of the stakeholders, in relation with the Project, is planned to be implemented in a timely manner.

IFC Performance Standards

The key requirements related to stakeholder engagement from IFC PS 1 are summarized below:

- An Environmental and Social Management System (“ESMS”) should be prepared and implemented, and the element of stakeholder engagement should be included,
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.



- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation (ICP) is to be conducted.

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

- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders (reporting once every 6 months for construction phase, and annual basis on operational phase of the project)
- Management Functions.

EBRD Performance Requirements:

The European Bank for Reconstruction and Development (EBRD or the Bank) is committed to promoting “environmentally sound and sustainable development” in the full range of its activities pursuant to the Agreement Establishing the EBRD. All projects financed by EBRD shall be structured to meet the requirements of EBRD’s Environmental and Social Policy (2019).

EBRD Environmental and Social Policy established the following issues:

- Outlines how the Bank will assess and monitor the environmental and social risks and impacts of its projects;
- Sets minimum requirements for managing environmental and social impacts and risks caused by EBRD financed projects throughout the lifetime of the projects;
- Sets a strategic goal for the Bank to promote projects with high environmental and social benefits; and
- Defines the respective roles and responsibilities of f both EBRD and its clients in designing, implementing and operating projects in accordance with this Policy.

EBRD has adopted a comprehensive set of specific Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet.

The PRs are as follows:



PR 1: Assessment and Management of Environmental and Social Risks and Impacts

PR 2: Labour and Working Conditions

PR 3: Resource Efficiency and Pollution Prevention and Control

PR 4: Health, Safety and Security

PR 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PR 7: Indigenous Peoples

PR 8: Cultural Heritage

PR 9: Financial Intermediaries

PR 10: Information Disclosure and Stakeholder Engagement.

This SEP will comply with EBRD PR 10 Information Disclosure and Stakeholder Engagement. This Performance Requirement (PR) recognises the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship.

The objectives of PR 10 are to:

- outline a systematic approach to stakeholder engagement that will help the client build and maintain a constructive relationship with their stakeholders;
- provide means for effective and inclusive engagement with project stakeholders throughout the project cycle,
- ensure that appropriate environmental and social information is disclosed and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided through the consultation is taken into consideration; and
- ensure that grievances from stakeholders are responded to and managed appropriately.

As per EBRD's PR 10; stakeholder engagement will involve the following elements: stakeholder identification and analysis, stakeholder engagement planning, disclosure of



information, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Stakeholder engagement will begin as early as possible in the project development and will continue throughout the project life cycle. The client will comply with the applicable requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under public international law. The client will define clear roles, responsibilities, and authority as well as designate specific personnel for the implementation and monitoring of stakeholder engagement activities.

Stakeholder Identification

The client will identify and document stakeholders, defined as the various individuals or groups who: (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties), or (ii) may have an interest in the project (other interested parties).

Information Disclosure

Where the project has environmental and social impacts, the client will disclose relevant project information, as appropriate, to help stakeholders understand the risks, impacts and opportunities of the project.

The client will provide stakeholders with access to the following information:

- the purpose, nature, scale and duration of the project;
- risks to, and potential impacts on, stakeholders and proposed mitigation plans highlighting potential risks and impacts that might disproportionately affect vulnerable and disadvantaged groups and differentiate measures to mitigate these;
- the envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate;
- the time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarised, and reported; and
- the process by which any grievances will be managed.

Meaningful Consultation

The client will undertake meaningful consultation, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest. If the client has already engaged in such a process, they will provide adequate documented evidence of



such engagement.

Engagement during project implementation and external reporting

Throughout the life of the project, the client will provide information to identified stakeholders, on an ongoing basis. The frequency, method and information to be provided will be appropriate to the nature of the project and its adverse environmental and social risks and impacts, the stakeholder and the level of interest. Additional information disclosure or consultation may be needed at key stages in the project cycle and on any specific issues that the disclosure and consultation process or grievance mechanism has identified as of concern to the stakeholders.

Grievance Mechanism

The client will need to be aware of and respond to stakeholders' concerns related to the project in a timely manner. For this purpose, the client will establish an effective grievance mechanism as early as possible in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, about the client's environmental and social performance. The grievance mechanism will be proportionate to the risks and potential adverse impacts of the project.

4 STAKEHOLDER ENGAGEMENT

4.1 Early Engagement

The e-mail address and telephone number are presented in the website of SASA (www.sasa.com.tr)

The communication / consultation form is presented in the website of SASA. External grievance forms will be distributed in public places as well, presented as Appendix A.

Meetings with mukhtars of Sarihamzalı and Yolgeçen neighborhoods have been organized in the scope of the Project and meeting notes as an example are available in the Appendix F.

Wish and Suggestion Notification Mechanism posters have been hanged on mukhtar's offices in the neighborhoods around the PTA Production Plant Project, this poster is available in this Appendix-E. It has been explained that direct communication can be ensured from entrance of PTA Production Plant Project Site & SASA Main Gateway by wish/suggestion forms. Additionally, people are informed by posters in Aol about how to get in contact with SASA by using website of www.sasa.com.tr/iletisim/dilek-sikayet-oneri-kayit-formu.

Within the scope of the project, in accordance with Article 9 of the "EIA Regulation" published



in the Official Gazette dated 25.11.2014 and numbered 29186, A “Public Participation Meeting” was held in Sarihamzalı Neighbourhood on 30th June 2020 at 10.30 in the marketplace of the neighbourhood in order to ensure public participation in the EIA process, to inform about the activity, to receive their opinions and suggestions. Local and national newspapers were used for the announcement of the details of the meeting. Residents from local communities, representatives of SASA and authorities from Adana Provincial Directorate of Environment and Urbanization were participated to the meeting. The meetings comprised of presentation includes the Project information and record of comments and suggestions.

5 STAKEHOLDER IDENTIFICATION

5.1 Stakeholder Groups

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

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context.

The relevant stakeholder groups comprising Vulnerable groups are presented in Table 5-1 below.

Table 5-1 Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
Local Communities		
Mukhtars and residents, landusers and local farmers of <ul style="list-style-type: none"> • Sarihamzalı Neighbourhood (prioritized neighborhood due to its location, economic & social conditions etc.) • Yolgeçen Neighbourhood • Mekan Neighbourhood • Söğütlü Neighbourhood • Kavaklı Neighbourhood • Küçükdikili Neighbourhood • Yeşiloba Neighbourhood • Gölbaşı Neighbourhood • Büyükdikili Neighbourhood • Sarihuğlar Neighbourhood 	✓	✓
Government		
<ul style="list-style-type: none"> • Adana Provincial Directorate of Environment and Urbanization • Adana Provincial Directorate of Agriculture and Forestry • Seyhan District Governor • 6th Regional Directorate of State Hydraulic Works • TEİAŞ (Turkish Electricity Transmission Co. Inc.) 	✓	✓



Municipality		
Seyhan Municipality Adana Metropolitan Municipality	✓	✓
Media		
<ul style="list-style-type: none"> • Adana Gazete • Adana Haber • Adana Medya • Doğu Akdeniz'den • Doriga • Ekspres Gazetesi • Gazete Adana • Idealist Gazetesi • Yeni Adana • Yenigün Gazetesi 	✓	✓
NGOs		
<ul style="list-style-type: none"> • Seyhan Chamber of Agriculture • Adana Chamber of Industry • Çukurova Development Agency • South Adana Women Cooperative (Local Women) 	✓	✓
Vulnerable Groups		
<ul style="list-style-type: none"> • Elderly PAPs, • People with disabilities, • Migrant workers and refugees (living in Sarıhamzalı Neighborhood) and • Low income groups. 	✓	✓
Private Sector		
<ul style="list-style-type: none"> • TEMSA • Adana Recycler Site • Pilyem Gıda A.Ş. 	✓	✓

5.2 Vulnerable Groups

Vulnerable groups are people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law. In the scope of the Project, vulnerable groups are identified according to the Mukhtars of the neighborhoods. These vulnerable groups are also given in Table 5-1. SASA



shall conduct specific consultations with these vulnerable groups.

As part of the Environmental and Social Impact Assessment (ESIA) studies interviews and social impact assessment studies were conducted. The aim of this survey was to determine socio-economic status of each settlement inclusive of population, migration and reasons of migration, ethnic composition, age distributions, social facilities and to determine the concerns of the stakeholders. Due to Covid-19 pandemic, face-to-face interviews were limited and most of the interviews were conducted online.

During these studies the Mukhtars were asked to identify vulnerable groups in their neighbourhoods. According to the Mukhtars the important vulnerable groups among the settlements are: elderly people, disabled people, migrant workers and refugees especially in Sarıhamzalı Neighbourhood and low income groups.

- **Elderly people:** Elderly people who need special care and according to the information obtained from the Mukhtars. It should be noted that, it is not easy to put every elderly person in the vulnerable categories who are living in the affected settlements since most of the elderly people are retired and they have a monthly income from the government.
- **Disabled people:** This group is likely to experience the impacts of the Project due to their physical or mental characteristics.
- **Migrant workers and refugees:** It was reported by the Mukhtars that there were occasional conflicts between Syrian migrants and residents of the neighbourhoods. The number of Syrian immigrants is especially high in Sarıhamzalı Neighbourhood.
- **Low-income groups:** This group is accepted as vulnerable since their incomes are lower than the poverty line for a family of four set for Turkey. As per the Mukhtars' statements, the average income in the neighborhoods except for Yolgeçen and Küçükdikili is lower than minimum wage limits.

6 STAKEHOLDER ENGAGEMENT PROGRAM

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

Due to Covid-19 security concerns in Turkey, EBRD has summarized alternative stakeholder engagement tools under the PR 10 as EBRD Briefing Notes and provided engagement plan templates to prepare a short-term engagement plan. SASA shall consider Covid-19 measures during stakeholder engagement activities. EBRD's Briefing Note regarding PR10 would be considered as a guidance.



6.1 Engagement Program

The main goals of the stakeholder engagement program are to inform, disclose and consult on various project documents and activities early on to establish a dialogue with Project Stakeholders from project planning through implementation and operation.

SASA will ensure that meaningful participation, consultation will be carried out and project information will be disclosed to all stakeholders. Consultation activities are designed with some key guiding principles, including:

- ✓ Consultations should be widely publicized, particularly among project-affected stakeholders/communities, preferably one week before any meeting or commitment.
- ✓ A non-technical briefing should be available prior to any event to ensure that people are informed of the assessment and results prior to scheduled meetings.
- ✓ The location and timing of meetings should be designed to maximize stakeholder engagement and availability.
- ✓ The information presented should be clear and non-technical and, where necessary, in all appropriate local languages.
- ✓ Participation should be facilitated to allow stakeholders to voice their views and concerns.
- ✓ Care will be taken to ensure direct communication with farmers on the south side of the project area.
- ✓ Issues that arise should be addressed at meetings or at a later time.
- ✓ While documenting the stakeholder engagement activities to be carried out within the scope of stakeholder engagement of the Project, it will be prepared to cover the following information:
 - ✓ Date(s) and location(s) of consultation(s), and the related notification(s) (newspaper ads, screenshots of the social media announcements, etc.),
 - ✓ Details on the attendees (in accordance with the Law on the Protection of Personal Data),
 - ✓ Meeting Program/Schedule (and also information on what is presented by whom),
 - ✓ Summary Meeting Minutes (Comments, Questions and Response by Presenters),
 - ✓ Review of Comments, agreed actions, issues and activities that require follow-up actions, including clarification on how stakeholders are informed about the decisions made.

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



- Publication for public review of the Stakeholder Engagement Plan, Non-Technical Summary and Environmental and Social Action Plan;
- Meetings with regulatory bodies;
- Public meetings;
- Published on local municipalities' website (if available) and/or on a dedicated Sponsor's website;
- Announcements in local media;
- Provision of general information on noticeboards at key public locations.

The following table summarizes the stakeholder engagement program in terms of:

- Activity / project;
- Type of information disclosed;
- Location and dates of meetings / forms of communications;
- Stakeholder groups consulted.

In order to document the stakeholder engagement activities, a stakeholder engagement log such as given in Table 6-1, will be prepared and used.

Table 6-1 Sample Table for Stakeholder Engagement Log

Project Phase	Date and Location	Method Used	Purpose of Activity	Target Stakeholders	Meeting Summary / Key Issues Raised	Follow-up Actions

Proposed Stakeholder Engagement Program is given in Table 6-2.



Stakeholder Engagement Plan

Table 6-1. Stakeholder Engagement Program

ID	Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
SEP 1	-All affected settlements and Interested parties -Local communities -Local government -Local business	First Information Disclosure -Purpose, start date, duration, and nature of construction and operations activities -Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts -Closure options and impacts on local communities -Grievance mechanism disclosure - Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results (reporting frequency has been identified as once every 6 months for construction phase, and annual basis for operational phase of the project) - Continue disclosing information via SASA website	Dependent stakeholder classification	Prior to Construction, reviewed for updates every 2 years Annual Reporting to stakeholders will be conducted once every 6 months for construction phase, and annual basis for operational phase of the project	SRS
SEP 2	-All affected settlements and Interested parties -Local communities -Local government -Local business	Information Disclosures <ul style="list-style-type: none"> • Purpose, start date, duration, and nature of land preparation, construction and operations activities • Grievance Redress Mechanism • Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts/risks • Monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results 	Public Participation Meeting Posters to be hung in work areas etc. SASA website	During construction activities Once before operation activities start	SRS



Stakeholder Engagement Plan

ID	Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
SEP 3	<ul style="list-style-type: none"> -All affected settlements and Interested parties -Local communities -Local government -Local business 	<p>External Grievance Mechanism</p> <ul style="list-style-type: none"> -Disclosure of grievance mechanism to communities -Disclosure of grievances received and resolved to communities 		<p>Annual</p> <p>As requested / as needed</p>	SRS
SEP 4	<ul style="list-style-type: none"> -Local businesses -All affected settlements and mukhtars -Project Workers -Ministry of Labour and Social Security 	<p>Employment and Procurement Strategies</p> <ul style="list-style-type: none"> -Recruitment of employees -Training of staff -Procurement of supplies and services 	Depend on stakeholder classification	<p>Prior to Construction and operation, reviewed for updates every 2 years</p> <p>Annual</p> <p>As requested / as needed</p>	SRS
SEP 5	<ul style="list-style-type: none"> -All affected settlements and Interested parties -Local communities (including nearby agricultural land users, adjacent farmers etc.) -Local government -Local business 	<p>Use of Emergency Response and Preparedness</p> <ul style="list-style-type: none"> -Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders. -Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	<p>Drills</p> <p>Annual drills</p> <p>Workshops</p> <p>Community meetings</p>	HSE Department SRS	<ul style="list-style-type: none"> -All affected settlements and Interested parties -Local communities (including nearby agricultural land users, adjacent farmers etc.) -Local government -Local business



Stakeholder Engagement Plan

ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
SEP 6	NGOs	<p>Social progress, economic and social development and environmental protection</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> -Mitigation measures against potential environmental and social risks -Sustainability criteria -Social responsibility projects, implementation principles -Cumulative impacts of project in the region 	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	As required / As requested	SRS
SEP 7	<ul style="list-style-type: none"> -All affected settlements and mukhtars -Adana Municipality -Seyhan Municipality 	<p>Road Transportation</p> <ul style="list-style-type: none"> -Road safety awareness, including on safe crossing of the bypass and access roads -Types, number and frequency of vehicles that can be anticipated through different phases of the Project -Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children are present. -Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns) -Communication of traffic measures and Project road usage with mukhtars 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually.</p> <p>As requested / as needed</p>	SRS



Stakeholder Engagement Plan

ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
SEP 8	<ul style="list-style-type: none"> -All affected settlements, nearby agricultural land users and mukhtars - Mukhtars -Adana Metropolitan Municipality -Seyhan Municipality 	<p>Management of environmental and social risks of the Project</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> -Environmental monitoring program -Environmental monitoring results - Overall information about progress of the Project -Cumulative impacts in the region 	<p>Meetings with Mukhtars (once every 3 months for construction phase and once 6 months for operational phase)</p> <p>Meetings with nearby agricultural land users (once every 3 months for construction phase & once every 6 months for operational phase)</p> <p>Brochures</p> <p>Workshops</p>	As required / As requested	SRS
SEP 9	Vulnerable Groups	<p>Employment and any other interest of vulnerable groups</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> -Recruitment of disabled and women employees -General information of the project, environmental and social impacts, mitigation measures, monitoring activities of the project -Special measures for vulnerable / disadvantaged individuals / groups -Training of staff -Use of roads, water and other infrastructure, increase in traffic density -Local employment -Important commercial opportunities -Environmental impacts 	<p>Meetings targeting any identified vulnerable groups</p> <p>Women meetings</p> <p>Focus group meetings (with disabled people and their representatives accompanied by relevant specialist depending on the disabled group)</p> <p>NTS</p>	<p>At the beginning of the construction and operation</p> <p>As requested / as required</p>	SRS



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ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
SEP 10	<ul style="list-style-type: none"> -Workforce -All affected settlements and mukhtars -Adana Municipality -Seyhan municipality -Local government 	<p>Community Health</p> <ul style="list-style-type: none"> -Provide training on Company policies (employees and contractors) on respectful and appropriate behaviour with communities -As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. -Work with women in the communities to help prevent and manage communicable diseases, particularly due to women's primary role as caretakers of ill family and community members, and due to their vulnerability and their productive and reproductive roles. 	<ul style="list-style-type: none"> Face to face meetings Dependent stakeholder classification 	<ul style="list-style-type: none"> At least annually. As requested / as needed 	SRS
SEP 11	SASA and Project Contactor employees	<p>Employee welfare</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> - Employee Grievance Mechanism -Labor rights -OHS procedures -Contractor management 	<ul style="list-style-type: none"> Face to face interview OHS Committee Labour audits 	<ul style="list-style-type: none"> Monthly or when required due to the results of grievance mechanism 	SRS



6.2 Proposed Strategy for Information Disclosure

Stakeholder engagement is an ongoing process that begins before the development of the SEP and will continue throughout the lifetime of the Project. SASA will be in active communication with identified stakeholders throughout the lifetime of the Project. In particular, SASA will seek feedback from stakeholders on the E&S performance of the Project and the implementation of the identified mitigation measures and the Grievance Mechanism Procedure. If there are significant changes in the Project resulting in additional risks and impacts, especially where they will affect the project affected parties, SASA will provide information on these risks and impacts and consult with the project affected parties on how to mitigate these risks and impacts.

For each of the targeted stakeholder group, different disclosure methods and means can be used in order to increase the disclosure level. Especially for the public participation meetings, the meeting venue(s), time and date will be arranged, and that information will be announced to the public at least fourteen (14) days before the event making sure that all community members are informed about the event to be held. The Project's strategy for information disclosure is presented in Table 6-2.



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Table 6-2 Proposed Information Disclosure Strategy

Project Stage	Topic of Consultation	Methods Used	Timetable	Target Stakeholders	Responsibilities
Construction	<ul style="list-style-type: none"> Project information - scope and rationale and E&S principles Coordination activities Land Acquisition Process Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Face-to-Face Meeting Invitations to public/community meetings Mobile Technology such as Phone Calls, SMS, etc. 	During the construction activities	National and Local State Institutions and Organizations	SRS
	<ul style="list-style-type: none"> Regular updates about the Project Land Acquisition Process Project E&S principles Grievance Mechanism Procedure Community Health and Safety E&S risks and mitigation measures 	<ul style="list-style-type: none"> Public meetings Public notices Electronic publications via online/social media and press releases 	During the construction activities	Project-Affected Settlements (Local Communities)	SRS
	<ul style="list-style-type: none"> Regular updates about the Project Project E&S principles Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Face-to-Face Meeting Invitations to public/community meetings Mobile Technology such as Phone Calls, SMS, etc. 	During the construction activities	Non-Governmental Organizations	SRS
	<ul style="list-style-type: none"> Regular updates about the Project Project E&S principles Grievance Mechanism Procedure Community Health and Safety E&S risks and mitigation measures 	<ul style="list-style-type: none"> Public meetings Public notices Electronic publications via online/social media and press releases Information leaflets and brochures; audiovisual materials, separate focus group meetings with vulnerable/disadvantaged individuals/groups 	During the construction activities	PAPs including non-organized individuals/groups with particular areas of interest or that may be vulnerable/disadvantaged (i.e., elderly, people with disabilities, women, people whose lands will be expropriated second time etc.)	SRS
	ESIA package (SEP, NTS and Project Leaflet) disclosure *	<ul style="list-style-type: none"> Disclosure of ESIA package on Project web-site (www.sasa.com.tr) Disclosure of the ESIA package on Project general site office (Adress: Sarihamzalı Mah. Turhan Cemal Beriker Bulvarı No: 559 Seyhan / Adana) Disclosure of the hardcopies of the ESIA package on Mukhtars (Sarihamzalı, Yolgeçen, Mekan, Söğütü, Kvaklı, 	During the construction activities	Whole Project Stakeholders (i.e. National and Local State Institutions and Organizations, Project-Affected Settlements, Non-Governmental Organizations and PAPs including non-organized individuals/groups with particular areas of interest or that may be vulnerable/ disadvantaged (i.e., elderly, people with	SRS



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		<p>Küçükdikili, Yeşiloba, Gölbaşı, Büyükdikili and Sarıhuğlar) offices</p> <ul style="list-style-type: none"> By electronic notification through project website (www.sasa.com.tr), by providing hard copy of notifications to the Mukhtars' offices) directly indicating that ESIA disclosure package was began Providing direct notification to the nearby farmers via phone to inform ESIA package disclosure was began. 		<p>disabilities, women, people whose lands will be expropriated second time etc.)</p>	
<p>Land Preparation and Construction</p> <p>Project Implementation Phase</p> <p>Operation phase</p>	<ul style="list-style-type: none"> Project information-scope and rationale and E&S principles Coordination Activities Grievance Redress Mechanism Process 	<ul style="list-style-type: none"> Face-to-Face Meeting Mobile Technology such as Phone Calls, SMS, etc. 	Monthly	National and Local State Institutions and Organizations	SRS
	<ul style="list-style-type: none"> Project E&S principles Grievance Mechanism Procedure Community Health and Safety E&S Risks and Mitigation Measures 	<ul style="list-style-type: none"> Public meetings Public notices Electronic publications via online/social media and press releases Presentations 	Monthly	Project-Affected Settlements (Local Communities)	SRS
	<ul style="list-style-type: none"> Project E&S principles Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Face-to-Face Meeting Mobile Technology such as Phone Calls, SMS, etc. 	Monthly	Non-Governmental Organizations	SRS
	<ul style="list-style-type: none"> Project E&S principles Grievance Mechanism Procedure Potential Labor influx stemming from construction works Community Health and Safety E&S Risks and Mitigation Measures 	<ul style="list-style-type: none"> Public meetings Public notices Electronic publications via online/social media and press releases Presentations 	Monthly	PAPs including NGOs with particular areas of interest or that may be vulnerable/disadvantaged (i.e., elderly, people with disabilities, women, people whose lands will be expropriated second time etc.)	SRS



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	<ul style="list-style-type: none"> ESIA package (SEP, NTS and Project Leaflet) disclosure * 	<ul style="list-style-type: none"> Disclosure of ESIA package on Project web-site (www.sasa.com.tr) Disclosure of the ESIA package on Project general site office (Adress: Sarıhamzalı Mah. Turhan Cemal Beriker Bulvarı No: 559 Seyhan / Adana) Disclosure of the of the hardcopies of the ESIA package on Mukhtars (Sarıhamzalı, Yolgeçen, Mekan, Söğütlü, Kvaklı, Küçükdikili, Yeşiloba, Gölbaşı, Büyükdikili and Sarıhuğlar) offices Electronic notification through project website (www.sasa.com.tr), providing hard copy of notifications to the Mukhtars' offices) directly indicating that ESIA disclosure package was began Providing direct notification to the nearby farmers via phone to inform ESIA package disclosure was began. 	<p>During the operational phase</p>	<p>Whole Project Stakeholders (i.e. National and Local State Institutions and Organizations, Project-Affected Settlements, Non-Governmental Organizations and PAPs including non-organized individuals/groups with particular areas of interest or that may be vulnerable/disadvantaged (i.e., elderly, people with disabilities, women, people whose lands will be expropriated second time etc.)</p>	
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* *Project stakeholders shall comment on the ESIA Disclosure package (SEP, NTS and Project Leaflet) via a comment box given on the website or by a direct e-mail (info@sasa.com.tr) to the Project to be provided on the web site.*

6.3 Proposed Strategy for Incorporate the View of Vulnerable/Disadvantaged Individuals/Groups

SASA will take specific measures to ensure that disadvantaged and vulnerable individuals/groups have equal opportunities to access information, provide feedback or raise grievances. The deployment of the public communication, social and citizen engagement specialist will help to ensure proactive outreach to all population groups.

Some of the strategies to be adopted to effectively interact and communicate with vulnerable/disadvantaged individuals/groups will be towards:

- ✓ Conduct targeted consultations with vulnerable/disadvantaged individuals/groups to understand concerns/needs regarding access to information, facilities and services supported by the project and other challenges they face in their homes, workplaces and communities.
- ✓ Identify the leaders and organizations of vulnerable/disadvantaged individuals/groups to reach these groups,
- ✓ Maintain a database of marginalized groups through existing industry associations,
- ✓ e.g. disability organizations,
- ✓ Engage community leaders, Community Governmental Organizations (CGOs) and NGOs working with vulnerable/disadvantaged individuals/groups,
- ✓ Organize face-to-face focus group discussions with these populations, as and when appropriate.
- ✓ The awareness-raising and stakeholder engagement with vulnerable/disadvantaged individuals/groups will take into account their particular sensitivities, concerns, and cultural sensitivities, to ensure their full understanding of project activities and benefits.

In addition, for the working stakeholders, the timing of those event should be arranged in a way that they can also participate in the consultations event, or alternative solutions for those will be created. The following additional support or resources will be made available to enable these people in the stakeholder engagement activities. At this point following measures should be taken:

- ✓ Providing translation for the refugees who do not understand/speak Turkish,
- ✓ Providing written materials related to Project information in larger fonts and in Braille system,
- ✓ Choosing accessible venues for the consultation events and/or providing transportation for the people in remote areas (for example in villages),
- ✓ Organizing small events or meeting for the vulnerable/disadvantaged people depending on their sensitivity (for example, a small meeting with deaf individuals accompanied by a sign language expert),
- ✓ Organizing the events/meetings or consultation processes with the vulnerable/disadvantaged individuals/groups in coordination with the relevant NGOs (if any) (for example, for physically disabled people, organizing the meeting/event with the help of Solidarity Association of Physically Disabled),
- ✓ The timing of the consultation events should be arranged in a way that the working stakeholders can be able to participate. For those who cannot participated even though the timing is arranged, brochures, an active web page, social media, face-to-



face individual meetings etc. could be organized.

7 TOOLS & METHODS FOR INFORMATION DISCLOSURE DURING CONSTRUCTION AND OPERATION OF THE PROJECT

SASA will provide transparent informative material in a consistent and timely manner to the affected communities and the remaining stakeholders. The manner in which this material will be disclosed is discussed in the sections that follow.

7.1 Internal / Web Site

SASA will keep information on the Project updated on their website in both Turkish and English. The homepages of the website can be found here:

- www.sasa.com.tr

7.2 Information Sheets

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

7.3 Responding to Local Communities and Publications for People

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

At the SASA website, material providing information about different stages of the project will be available, and stakeholders will be kept posted.

When needed, particular matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities on the basis of impact assessment surveys carried out by company. As long it is appropriate, relevant Project information will be disclosed to the public.



7.4 Disclosure Activities

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

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

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

SASA will inform the public, via newspapers, meetings, media and other similar means, about



how people can access Project related documents (such as this SEP and NTS) and the project timetable, and how they can submit comments regarding said documents.

8 MANAGEMENT OF GRIEVANCES

8.1 Grievance and Feedback Procedure

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

Grievance procedures provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible and transparent manner.

Grievance procedures will be coordinated through the appointed Social Responsibility Staff with the help of HSE Department who are the primary interfaces between the community and SASA. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from either Investments and Operation, Corporate Communications or Human Resources department. The SRS is expected to conduct a bridge between the firm and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

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

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

8.1.1 Principles of the Grievance Mechanism (Internal and External Grievance Mechanism)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.



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- Keeping it up to date: The process will be regularly reviewed jointly by the SRS and the HSE Department. Regular monitoring and evaluation should be conducted continuously.
- Confidential and impartial process, non-retribution: The process will be confidential and impartial, without employees fearing retribution.
- Reasonable timescale: A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution.
- Keeping of records: Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

8.1.2 Collection, Registration and Evaluation of Grievances

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

- Initiate the grievance procedure, mainly by the SRS with the help of HSE Department;
- SRS registers the grievance/comment in the grievance database (see Appendix C);
- The SRS investigates the grievance and makes the first evaluation with the help of HSE Department;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 days after the grievance is received);
- The grievance is officially closed after related documentation is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated by Corporate Communications, Human Resources, Investments and Operation and HSE Departments; however, handling and tracking should be ensured to be done mutually.

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



8.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 days of grievance receipt.

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is important in maintaining a 'social license to operate'.

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

8.1.4 Grievance Mechanism Communication

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

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the first EHS training sessions will also include the stakeholder engagement and grievance mechanism process trainings;
- Communication about the grievance mechanism will be repeated regularly with the tool-box trainings;
- The grievance/suggestion boxes will be made available at the Project construction site offices for internal grievances; and
- All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).



For the collection of internal grievances from community:

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

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of SASA). These two mechanisms will have different respondents: External Grievance Mechanism will be run by the SRS and the HSE Department, while internal General Manager will be under the responsibility of different departments collaborating, such as HR, Finance, Corporate Communications and alike. A sample of the internal grievance form is presented in Appendix D.

8.2 Contact Details of SASA

SASA Polyester A.Ş.:

Sarihamzalı Mah. Turhan Cemal Beriker Bulvarı No:559 Seyhan / Adana

Telephone: +90 (322) 441 00 53

Fax: +90 (322) 441 01 14

E-Mail: info@sasa.com.tr

9 MONITORING

9.1 Key Monitoring Activities

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

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



Stakeholder Engagement Plan

- Reviews and revisions of the management plans and procedures.

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

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

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

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

Key monitoring measures are set out *Table 9-1* below.

Table 9-1. Key monitoring measures

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



Stakeholder Engagement Plan

Topic	Indicator	Method	Periodicity	Location
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of SASA Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Bi-annually (construction) Annually (operation)	Site office

9.2 Key Performance Indicators (KPIs)

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KIPs are given in *Table 9-2* below.

Table 9-2. Key performance indicators

KPI	Target	Monitoring Measures
Total number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (construction), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report

10 TRAINING

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

11 AUDIT AND REPORTING

Internally, conformance of this SEP will be monitored in accordance with the requirements of the SASA.

Contractors will be subject to inspection and audit in accordance with the requirements of the SASA.



Conformance with this plan will be subject to periodic assessment by SASA corporate audit and assurance programs and separately by Project Lenders.

11.1 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings,
- Community engagement activities (with mukhtars, nearby agricultural land users etc.)
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- New on press and interviews,
- Audits, investigations and incidents which will be managed according to SASA procedures.

On monthly basis, an overview of the grievances recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out will be developed periodically. The Social Responsibility Staff will evaluate and conclude this overview with project management in the monthly progress meetings.

11.2 Reporting Back to Stakeholder Groups

SASA will register and report the feedback received from communities, local authorities, landowners, other companies, NGOs, media, academic institutions and other interest groups on a systematic basis through an effective consultation and grievance mechanism. Additionally, SASA will report to the communities about Project's E&S performance **via SASA's annual sustainability reports.**

SASA will provide a statistical and qualitative analysis of feedback and complaints as well as their outcomes on a monthly basis to the SRS who will review it and disseminate it to the Ethics Committee, and Top Management of SASA. In addition, the relevant complaints and their actual status will be reported in ESMS. The reports will only include information regarding the complaint as much as necessary, and any personal information on the individuals having used the GMP will remain confidential and will never be shared in these reports.

A summary of the implementation of the stakeholder engagement activities will be provided to the public on a quarterly basis through the official website of the SASA (www.sasa.com.tr) to show that the stakeholder engagement activities and processes are being implemented. The summary will be



published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data.

If necessary, SASA will work with a consultant in order to implement social and environmental monitoring activities. This consultant (Supervision Consultant) will monitor and report to SASA whether the environmental and social issues specified in the SEP and ESMP documents are implemented throughout the life of the Project



APPENDICES



Appendix A: Complaint Register Form

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



Appendix B: Consultation Form

Toplantı Kayıt Formu/ Consultation Form			
Fomu Dolduran Kişi / Person filling out the form		Tarih / Date:	
Toplantı Gündemi / Agenda of the Meeting		Görüşme Kayıt No/ Consultation Register Number	
1. Toplantı Bilgileri/ Meeting Info			
Name of Authorized Person:		İletişim Şekli / Form of Communication :	
İstişare Edilen Kurum / Institution Consulted		<input type="checkbox"/> Telefon-Ücretsiz Hat / Phone-Free Phone Line	
Telefon / Telephone:		<input type="checkbox"/> İstişare Toplantısı / Consultation Meeting	
Adres / Address:		<input type="checkbox"/> Website / E-mail Web Sitesi / E-posta	
Köy - İlçe - İl Village -District -Province:		<input type="checkbox"/> Diğer (Açıklayın) / Other (Specify)	
Paydaş Tipi / Consultee/Stakeholder Type			
2. İstişare Detayları/ Details of Consultation			
Projeyle İlişkin Sorular / Questions regarding the project :			
Kaygılar & Geri bildirimler / Concerns & Feedbacks :			
Özel Notlar (Formu dolduran kişinin düşünceleri)			



Only for internal usage: Status of complaint		
	Date:	Signature:
Complaint is closed by:		
Actions taken (Provide details):		

Appendix E: PTA Production Plant Project Wish & Suggestion Notification Mechanism Poster which are suspended in mukhtar's offices in Aol



Your wishes are suggestions are very important for us.

You can get in contact with us from website of www.sasa.com.tr/iletisim/dilek-sikayet-oneri-kayit-formu or you can communicate directly with us from the entrance of PTA Production Plant Project Site & SASA Main Gateway by wish/suggestion forms.

Adress

Sarihamzalı Mah. Turhan Cemal Beriker Bulvarı No:559
Seyhan / Adana



Appendix F: Mukhtar Meeting Notes

Mukhtar's Meeting-1 (September 14th, 2021)

Location: Sarihamzali Mukhtar's Office

Meeting subject: Mukhtar's wishes, and demands

Participants: G.U. (SASA); S.A. (MGS Consultancy); M.A. (Mukhtar of Sarihamzali Neighborhood)

Meeting notes:

- Mukhtar expressed his concerns about possible flue gas, dust and leakage problems arising from the project in future. → He was informed the applied sprinkler irrigation in the field, and the 15 km/hour vehicle speed limit to eliminate dusting. Also he is informed about the advanced treatment technologies which will be used in the operation phase and valid discharge limits of the project which are the most strict ones among the national and international IFC standards.
- Mukhtar stated that they are uncomfortable with the smell of the DSI creek. → On April 8, it was informed that a sample was taken from the canal and the sample has been analyzed. In addition, it was reported that the channel cleaning work was carried out and the contaminated wastes were transferred to disposal together with the MOTAT (Mobile Waste Monitoring System) registration.
- The mukhtar said that they were uncomfortable with the contractor firm's use of the alleyways in the neighborhood. → After the meeting, the contractor companies were warned about this issue and they were controlled about not repeating the use of side roads.
- Even though there are 20-25 residents of the neighborhood working in construction and operation of SASA facilities, the mukhtar said that he wants to see more recruitment from Sarihamzali neighborhood both for university graduates and high school graduates. → There is employment from Sarihamzali and there will be employment from Sarihamzali in future too. However, university graduation may be required according to the position, roles and responsibilities.
- It was discussed that PTA could hang posters related to the complaint mechanism in the park, the street market and the area where the Anatolian High School is located. → A Wish and Suggestion poster was hung in the office of mukhtar by taking action on this issue.
- Muhtar said that the literacy rate of the residents of the neighborhood is very low. → A plan can be made for increasing the literacy rate in future.
- Muhtar said that Seyhan municipality discriminated against political parties and that's why they needed help. → Material support has been ensured to the neighborhood.
- The mukhtar has stated that he is pleased to be able to make his complaints heard by contacting Mr. Güven and Taşkın anytime.

Mukhtar's Meeting-2 (September 14th, 2021)

Location: The Garden of the Mukhtar's House of Yolgeçen Neighborhood

Meeting subject: Mukhtar's wishes, complaints and demands

Participants: G.U. (SASA); S.A. (MGS Consulting); F.D. (Muhtar of Yolgeçen District)

Meeting notes:

- At the meeting on June 10, the mukhtar stated that he wanted Güven Bey to organize a Quran course in the mosque. → SASA will be pleased to support projects related to schools, children, and women instead of this wish.
- Muhtar stated that he is not satisfied with the fact that they want a foreign language for recruitment at SASA. → Since this subject is related to position, role and responsibilities, it is explained that there are some job descriptions that may need a foreign language.
- It was discussed that posters related to the PTA complaint mechanism could be hung at the entrance of the village and where the mukhtar's office is. → An action was taken and a Wish and Suggestion Poster was hung in the mukhtar's office.

Decisions taken	Photos of the action taken	
<p>Designing a Wish and Suggestion poster to get in contact with people from the neighborhoods</p>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>PTA ÜRETİM TESİSİ PROJESİ DİLEK VE ÖNERİ BİLDİRİ MEKANİZMASI</p> <p>Dilek ve önerileriniz bizim için çok kıymetli. Bizimle www.sasa.com.tr/iletisim/dilek-sikayet-oneri-kayit-formu adresi üzerinden veya PTA Üretim Tesisi Proje Sahası'ndaki ve SASA Ana Kapısı'ndaki Dilek/Öneri Formları aracılığıyla irtibata geçebilirsiniz.</p> <p>Adres Sarıhamzalı Mah. Turhan Cemal Beriker Bulvarı No:559 Seyhan / Adana</p> </div> <div style="text-align: center;">  <p>PTA PRODUCTION PLANT PROJECT WISH & SUGGESTION NOTIFICATION MECHANISM</p> <p>Your wishes are suggestions are very important for us. You can get in contact with us from webiste of www.sasa.com.tr/iletisim/dilek-sikayet-oneri-kayit-formu or you can communicate directly with us from the entrance of PTA Production Plant Project Site & SASA Main Gateway by wish/suggestion forms.</p> <p>Adress Sarıhamzalı Mah. Turhan Cemal Beriker Bulvarı No:559 Seyhan / Adana</p> </div> </div>	
<p>Hanging a Wish and Suggestion poster in front of the Office of Sarıhamzalı mukhtar</p>		
<p>Hanging a Wish and Suggestion poster in front of the Office of Yolgeçen mukhtar</p>		