



# Stakeholder Engagement Plan Autoport Liman İşletmeleri A.Ş.

February 2026

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## 1. INTRODUCTION

### 1.1 Overview

This Stakeholder Engagement Plan (SEP) outlines the requirements and applied processes for stakeholder engagement and public consultation, stakeholder identification, and grievance mechanism for the planned port extension project (the Project) by Autoport Liman İşletmeleri A.Ş. (Autoport) and the Port Activities.

To finance the Project, the European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC) requires the Company to comply with all applicable Turkish laws and regulations and those of the EBRD and IFC. EBRD performance requirements (PRs) and IFC performance standards (PSs) per call for the preparation of the following documents, along with the present Stakeholder Engagement Plan (SEP): a Project specific Non-Technical Summary (NTS) and an independent Environmental and Social Due Diligence (ESDD) process leading to an Environmental and Social Action Plan (ESAP), agreed with Autoport. In line with EBRD PR 10 and IFC PS1, this SEP presents Autoport's commitment and approach in terms of disclosure of Project information and engagement of Project stakeholders. This SEP, along with the PRs, conforms to the importance of an open and transparent engagement between Autoport, its employees, local communities directly affected by Autoport's operations, and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship.

This document is intended for public disclosure and will be made available in Turkish and English by Autoport. Autoport is committed to implementing this SEP throughout all phases of the Project.

In case of any queries, comments, or suggestions concerning this SEP or the Company's operations, contact details are given below:

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### 1.2 SEP Objectives

Stakeholder engagement is an ongoing process, so this SEP is a 'living document' that will be updated and adjusted as required. This SEP provides a framework for stakeholder engagement; it has been designed so that Autoport can demonstrate effective, meaningful, consistent, comprehensive, coordinated, and culturally appropriate engagement in line with all the relevant legal and regulatory commitments and good international industry practices.

The primary objectives of Autoport stakeholder engagement are as follows:

- **Stakeholder Identification, Analysis, and Engagement Planning** Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Stakeholders.
- **Disclosure of Relevant Project Information** Information will be provided to stakeholders on relevant aspects of the Project: (i) the purpose, nature, scale, and duration of the project activities; (ii) risks to, and potential impacts on, stakeholders and proposed mitigation plans; (iii) the envisaged stakeholder engagement process, if any, and opportunities and ways in which the Public can participate; and (iv) the process by which any grievances will be managed.
- **Meaningful Consultation** Consultation will be in line with the degree of impact of the Project and by legal requirements and will be: (i) inclusive and culturally appropriate; (ii) free of external manipulation, interference, coercion, or intimidation; (iii) depending on the nature and scale of the Project's potential adverse impacts on affected communities; (iv) begin early as possible and continue throughout the Project, as appropriate and (v) be documented, as necessary.
- **Informed Consultation and Participation** Disclosure and consultation requirements will be embedded into each stage of the Project development, leading to Autoport incorporating into its decision-making process the views of the affected parties on matters that affect them directly, such as proposed mitigation measures, the equitable sharing of benefits and opportunities from projects, and implementation issues. The process will be documented, particularly the actions to avoid or minimize risks and adverse impacts on the affected stakeholders. The stakeholders will be informed about how their concerns have been considered. In addition, the consultation process will meet any applicable requirements under national environmental impact assessment laws and other relevant legislation.
- **Engagement During Project Implementation and External Reporting** Autoport will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the Project and its adverse environmental and social impacts and issues and the level of public interest throughout the life of the Project. In addition, Autoport will make publicly available periodic reports on their environmental and social sustainability.
- **Grievance Mechanism** Applying a grievance mechanism, process, or procedure to receive and facilitate the resolution of affected stakeholders' concerns and grievances about Autoport's environmental and social performance. The grievance mechanism will be scaled to the Project's risks and potential adverse impacts.
- **Ongoing Reporting to Affected Stakeholders** Provide periodic reports to the affected stakeholders that describe progress with the implementation of the Project. Action Plans on issues that involve ongoing risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism has identified as a concern to those stakeholders.

### 1.3 Project Description

The “Autoport Marine Terminal Modernization and Expansion Project” (Project) is planned to be constructed to increase the existing port capacity in the coastal area of Arpalık locality, Sepetlipınar Mahallesi, Başiskele District, Kocaeli Province. Autoport is Turkey's first “automotive specialized” port, built to meet the industry's need for a specialized port. Autoport has served the country and its region for many years and has made and continues to make economic contributions with the added value it creates.

Başiskele District, where the Project area is located, is surrounded by İzmit Bay and İzmit District to the north, Bursa Province to the south, Kartepe District and Sakarya Province to the east, Gölcük District and Yalova Province to the west. Figure 1-1 shows the Project area's location within the country and region. Figure 1-2 shows Başiskele District and its immediate surroundings. Figure 1-3, Figure 1-4 and Figure 1-5 show satellite images, photographs of the project area, its immediate surroundings.

Autoport has been reorganized to serve primarily as an automobile terminal in light of the country's and region's growing export potential and transportation requirements. Apart from the Ford plant, there are several automotive factories in the region, such as Hyundai, Toyota in Sakarya, Otokar, Turkish Tractor, Fiat-Karsan-Renault in Bursa, etc., and these factories export a large part of their production. Specialized vessels are used for vehicle shipment, which load and unload around 4,000 cars on average on scheduled voyages.

Serving numerous manufacturers and distributors for both imported and exported goods in the region, Autoport provides Roll-on/Roll-off (Ro-Ro) handling, warehousing, and integrated terminal management services for automobiles as well as for general cargo containing specific products (i.e., forestry, iron, and steel products) and project cargo for heavy and out-of-gauge freights (e.g., wind and gas turbines, factory equipment, and construction materials). The Autoport operates on a 243,351 m<sup>2</sup> area consisting of a backfill area (4,197 m<sup>2</sup>), a pier area (10,348 m<sup>2</sup>), and a land area (218,806 m<sup>2</sup>). The services offered and management services implemented at the facility are as follows (Figure 1-6 and Figure 1-7):

Table 1-1 Autoport Services

Service Information	Amount
Existing Port and Backfield	243,351 m <sup>2</sup>
Vehicle Parking Capacity	10,000 CEU*
Forecourt	1,265 CEUS
Back field	6,235 CEUS
PDI	2,500 CEUS
Annual Handling Capacity	650,000 CEU/year
Pier Length	328.5 m x 25 m
Number of Doors	2
Pilotage	7 / 24
Terminal Automation	7/24 Online

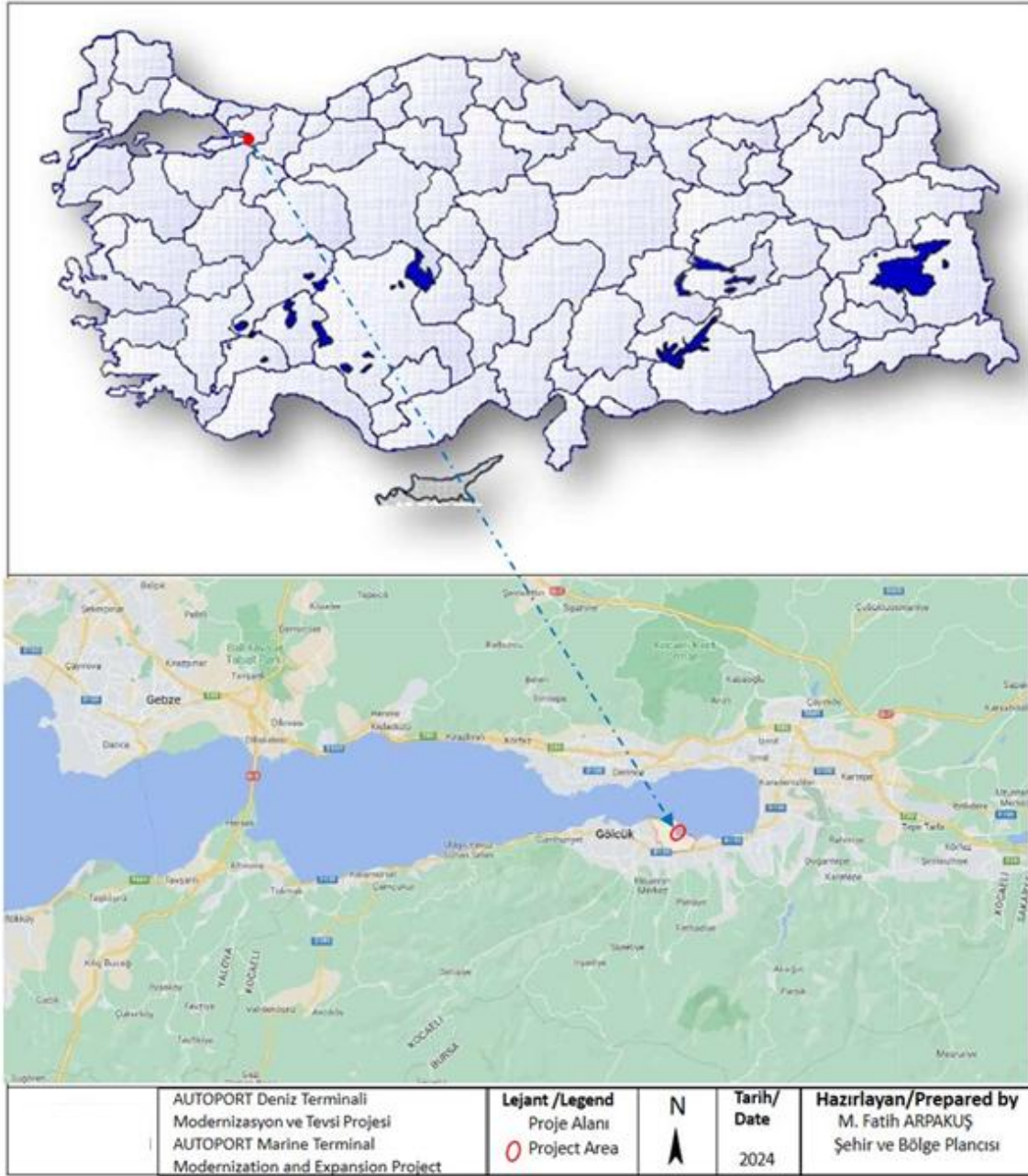


Figure 1-1 Location of the Project Area within the Country and Region

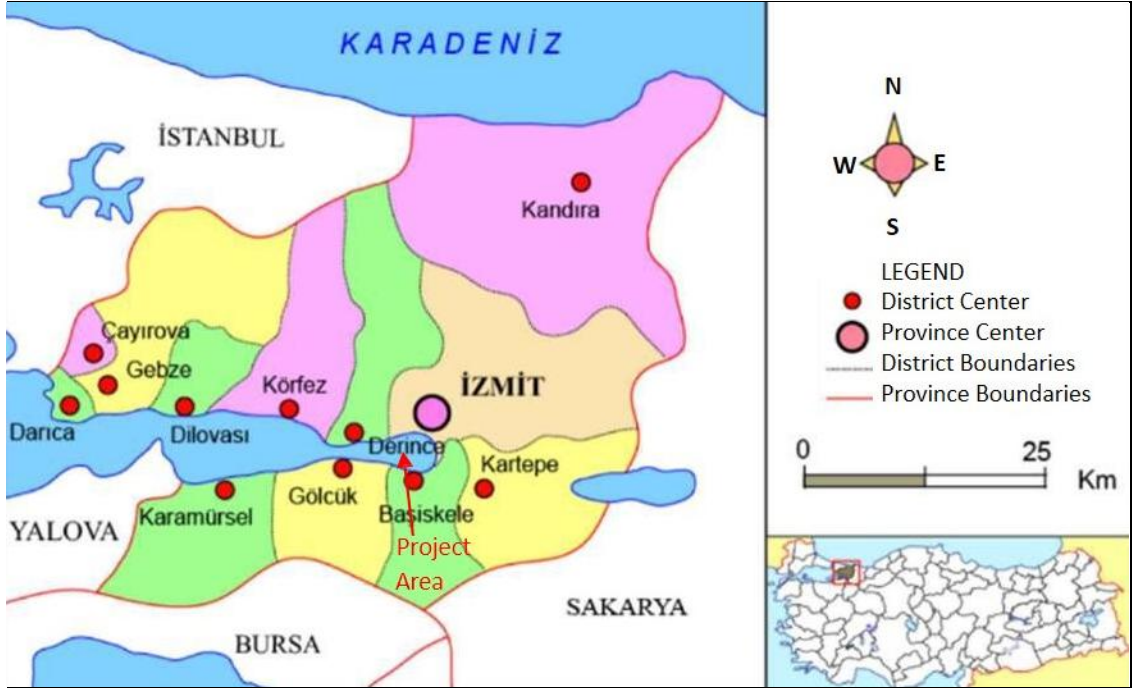


Figure 1-2 Başıskele District and its Near Surroundings where the Project Area is Located

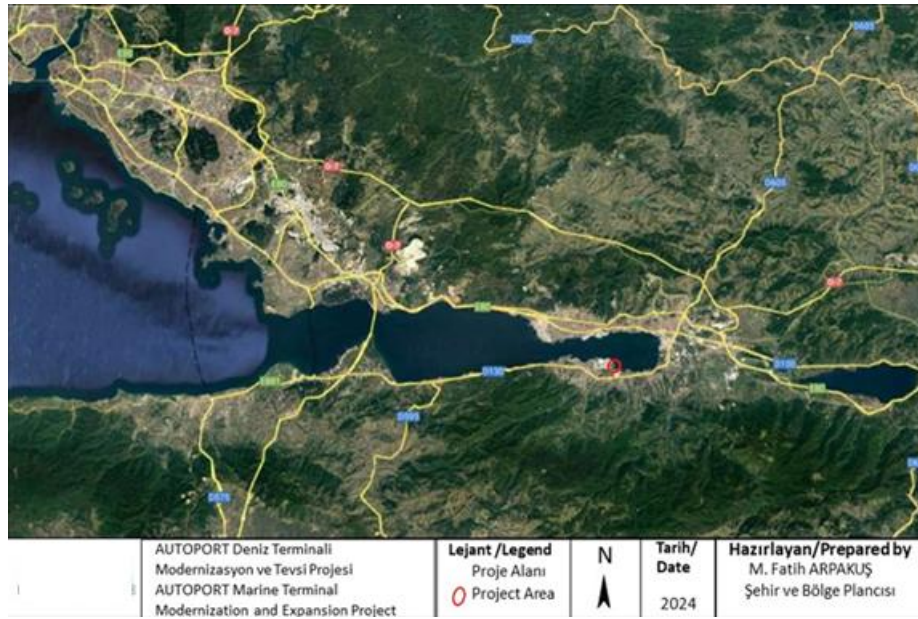


Figure 1-3 Satellite Image showing the Project Area and Surroundings



Figure 1-4 Satellite Image showing the Project Area and Surroundings

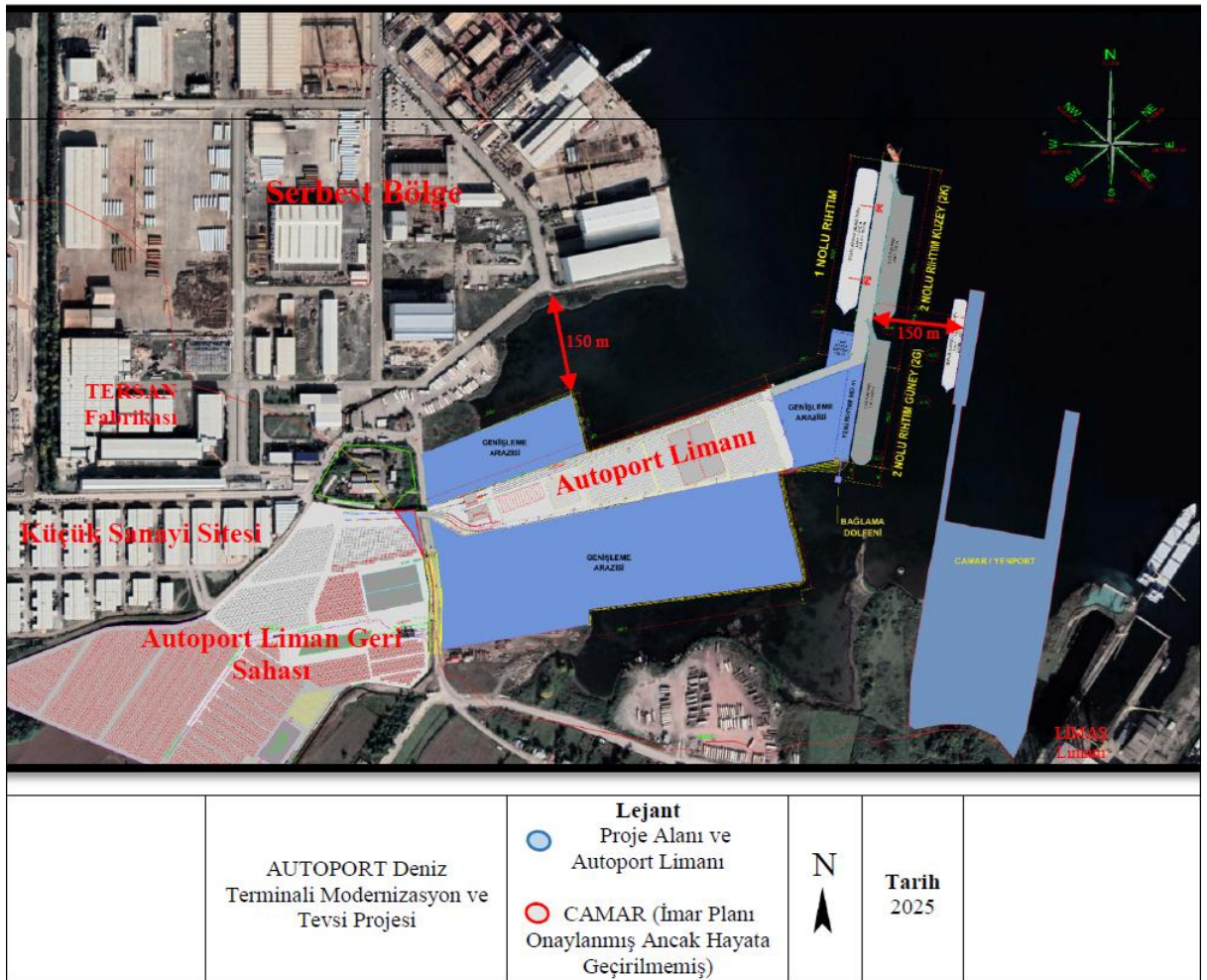


Figure 1-5 Satellite Image showing Autoport Port, Project Area and its Near Environment



Currently, the port handles 650,000 vehicles and 2,000,000 tons of general cargo. Approximately 230 Ro-Ro (roll-on roll-off) vessels and around 200 general cargo vessels are served annually. With the completion of the project, it aims to reach a handling capacity of 1,150,000 vehicles and 2,500,000 tons of general cargo. At the same time, it is envisaged that the ship acceptance capacity will be around 250 on the Ro-Ro ship side and around 300 on the general cargo ship side annually.

The maximum vessel capacity planned for the berth will be 80,000 DWT, which aligns with market demands. In this context, the planned coastal structures will have a maximum berthing capacity of 80,000 DWT.

The existing Autoport Port is 243,351 m<sup>2</sup> in total area, which will be 394,058 m<sup>2</sup> with the 150,707 m<sup>2</sup> area Project expansion. The Project expansion will consist of:

- (1) 4,075m<sup>2</sup> (163 m x 25 m) quay,
- (2) 50 m<sup>2</sup> (25 m x 2 m) catwalk connection,
- (3) 100 m<sup>2</sup> (10 m x 10 m) dolphin,
- (4) 1,859 m<sup>2</sup> (35 m - 63 m) Ro-Ro (roll on roll off) ramp,
- (5) 64 m<sup>2</sup> fire pump station
- (6) 144,559 m<sup>2</sup> storage area, where 12,118 m<sup>2</sup> platforms on piles and a total of 455,000 m<sup>3</sup> of filling on the 132,441 m<sup>2</sup> area are planned to be used for platform/loading/unloading/storage port facility expansion and modernization and
- (7) 487,000 m<sup>3</sup> dredging operations will be carried out on a 110,000 m<sup>2</sup> area including slope areas

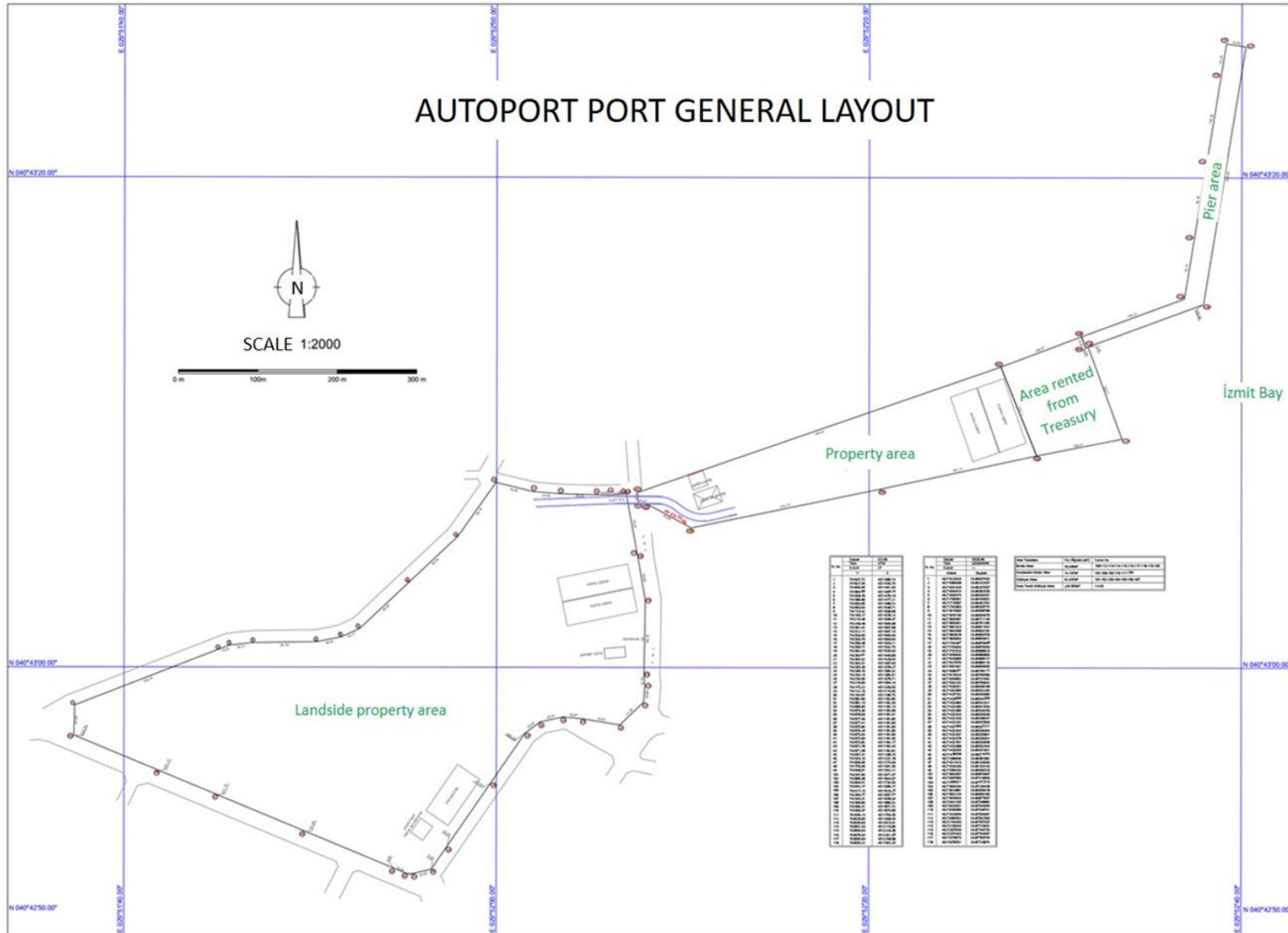


Figure 1-6 Autoport General Layout

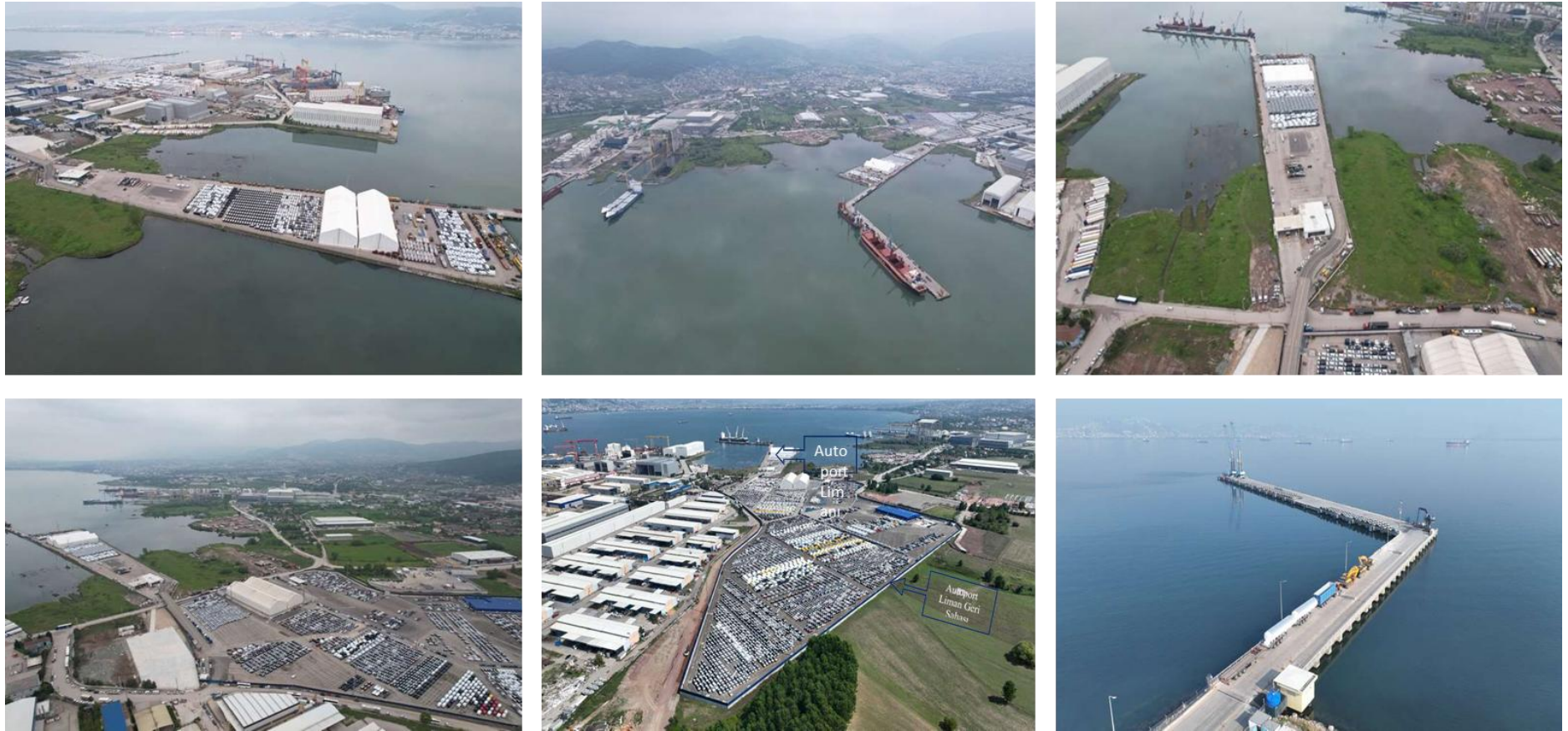


Figure 1-7 Photographs of Autoport Port Components

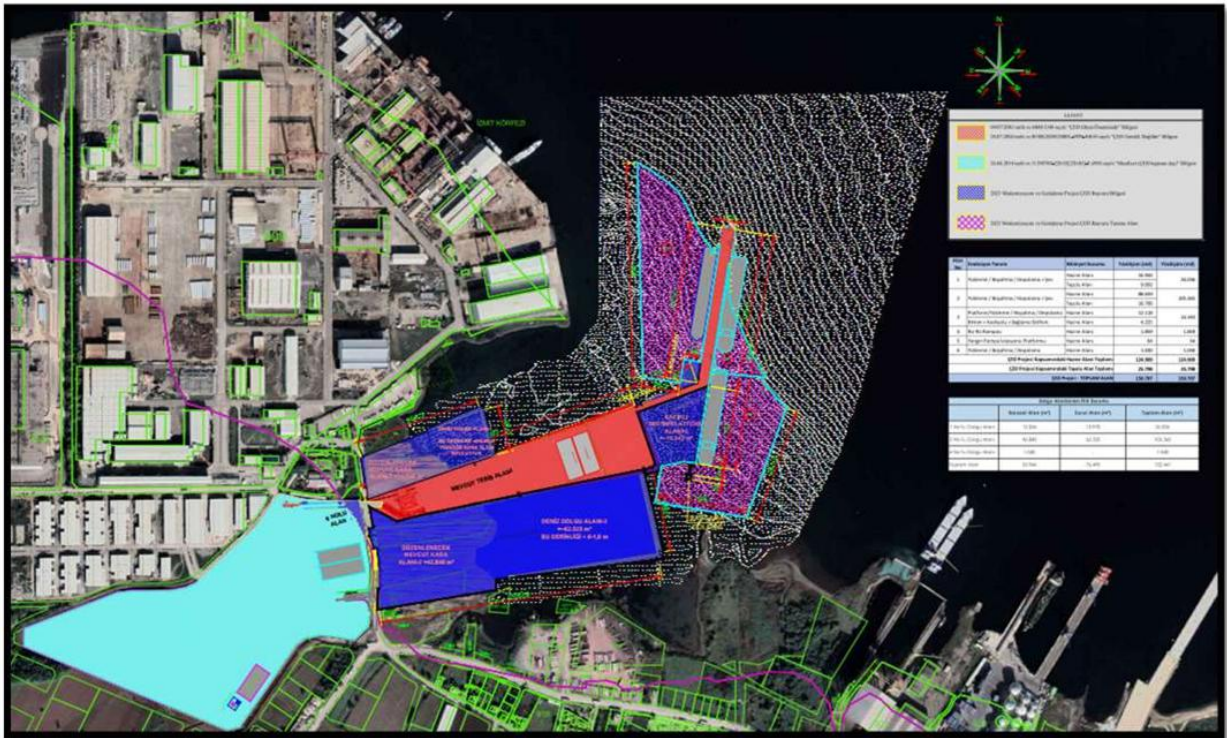


Figure 1-8 Actual Status of Project Areas and Embankment Area

The investment's construction period, excluding all kinds of permits, project design, and planning period, is foreseen as 26 months. Construction will start in the first quarter of 2026 and operation will start in 2028. The workflow diagram for the project to be realized within the project scope is given in Figure 1-9 Project Workflow Diagram.

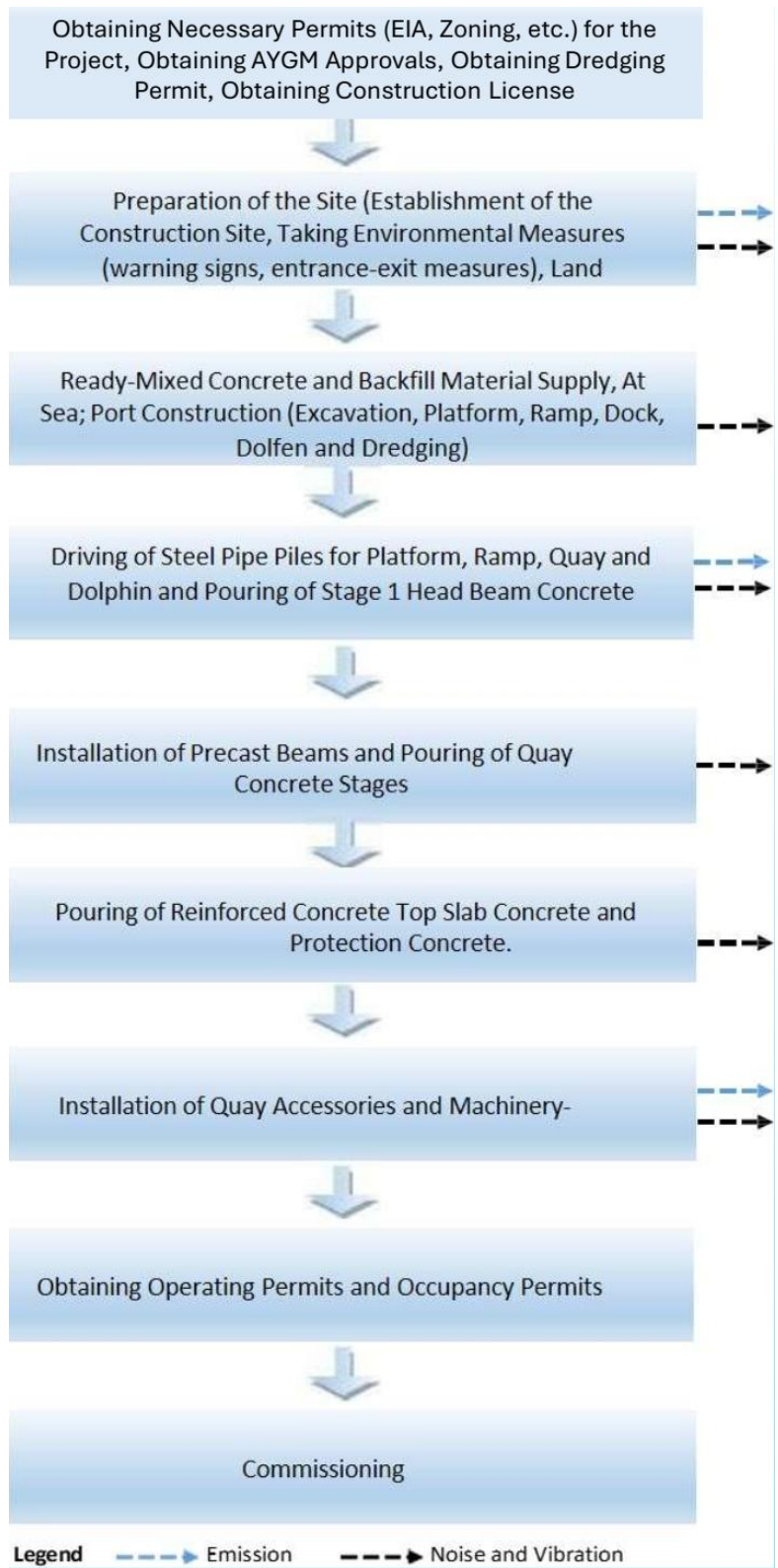


Figure 1-9 Project Workflow Diagram For Phase 1

## 2. LEGAL FRAMEWORK

### 2.1 National Standards

#### *Constitution of the Republic of Turkey*

The Constitution of the Republic of Turkey is the fundamental document concerning the stakeholder engagement processes. The constitutional provisions concerning stakeholder participation/engagement are as follows:

**Freedom of thought and opinion (Article 25 of the Turkish Constitution):** Everyone has freedom of thought and opinion. No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused because of his/her thoughts and opinions.

#### *Freedom of expression and dissemination of thought (Article 26 of the Turkish Constitution)*

Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing, in pictures, or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference from official authorities.

#### *Right to petition (Article 74 of the Turkish Constitution)*

Citizens and foreign residents in Turkey, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and the Grand National Assembly of Turkey about the requests and complaints concerning themselves or the Public.

#### *Law on the right to information*

Law on the Right to Information No.4982 (Official Gazette dated 24.10.2003 and numbered 25269) defines the process concerning the right to information. It regulates this right in line with the principles of equality, impartiality, and transparency, which are the prerequisites of democratic and transparent administration.

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

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, for their requests and complaints, by Article 3 of the Law on Use of the Right to Petition No.4982 (Official Gazette dated 01.11.1984 and numbered 3071). Regarding reciprocity and using the Turkish language in their petitions, foreigners residing in Turkey are entitled to this right.

#### *Environment Law*

The Environment Law No.2872 (Official Gazette dated 11.08.1983 and numbered 18132) aims to protect the environment, a common asset of all living things, in line with the principles of sustainable development and a balanced manner.

#### *Regulation on EIA*

An Environmental Impact Assessment (EIA), prepared in 2024 and submitted to the Ministry of Environment, Urbanization and Climate Change (MoEUCC); the document assessed the

Project's environmental impacts. The EIA was prepared to satisfy the Environmental Impact Assessment Regulation; Official Gazette Date/Number: 29.07.2022/31907.

Table 2-1 gives previously obtained permits, current status, and capacities for the Project area.

Table 2-1 EIA Approval and Scope

Units	09.07.2001 "No Significant Environmental Impact Decision for "Embankment and Jetty Facility"	28.07.2004 "EIA Not Required" Decision for "Zeyport Port Development Project"	26.04.2018 For the "Land Terminal for Storage Project" "EIA Regulation Out of Capacity" Opinion	Current Status	Current Project EIA Scope
<b>Embankment Area</b>	13.600 m <sup>2</sup>	52.000 m <sup>2</sup>	-	14.197 m <sup>2</sup>	132.441 m <sup>2</sup> (areas on the seaside of the coastal edge line: Area No. 1 26.036 m <sup>2</sup> + Area No. 2 105.365 m <sup>2</sup> + Area No. 6 1.040 m <sup>2</sup> )
<b>Area on Land</b>	40.920 m <sup>2</sup> (owned area on the seaward side of the coastal edge line)	75,000 m <sup>2</sup> landfilling	89,627 m <sup>2</sup> vehicle storage added to the existing facility area site and PDI facility on 2,400 m <sup>2</sup> of this area	218.806 m <sup>2</sup>	
<b>Scaffolding</b>	After filling, 138 m x 15 m in the northeast direction and 322 m x 15 m in the north direction. 25 m scaffolding structure was designed.	The 322 m x 25 m existing pier on the north side was envisaged to be extended by 100 m x 25 m, but only a tiny part was realized.	-	10.348 m <sup>2</sup> pier area (138 m x 15 m access road and 328,5 m from outside, 325.6 m from the inside long, 25 meters wide scaffolding structure)	
<b>Quay</b>	-	A 120 m x 25 m east-west quay between the embankment and the pier, where ships can open hatches from the rear and rear right-side revision (not realized)	-	-	It is 163 m long, south of the existing pier, and has a 4,075 m <sup>2</sup> (163 m x 25 m) new quay area.
<b>Ro-Ro Ramp</b>	-	-	-	-	1,859 m <sup>2</sup> new Ro-Ro ramp southwest of the existing pier
<b>Catwalk</b>	-	-	-	-	25 m catwalk (50 m <sup>2</sup> )
<b>Dolfen</b>	-	-	-	-	10 m x 10 m mooring dolphin (100 m <sup>2</sup> )
<b>Platform</b>	-	-	-	-	Will be located behind the new 163-meter quay 12.118 m <sup>2</sup> Platform (Area 3)
<b>Fire Pump Station</b>	-	-	-	25 m <sup>2</sup> (on scaffolding)	Fire pump station platform (64 m <sup>2</sup> ),
<b>Bottom Scanning</b>	-	-	-	-	The depth of the area to be dredged varies between 0.32 m and 13 m. areas will be dredged to a maximum of -13.5 m. Dredging area~80,000 m <sup>2</sup> excluding slope areas (~110,000 m <sup>2</sup> including slope areas) (~487,000 m <sup>3</sup> ).

Units	09.07.2001 "No Significant Environmental Impact Decision for "Embankment and Jetty Facility"	28.07.2004 "EIA Not Required" Decision for "Zeyport Port Development Project"	26.04.2018 For the "Land Terminal for Storage Project" "EIA Regulation Out of Capacity" Opinion	Current Status	Current Project EIA Scope
<b>Loads and Handling Capacities</b>	-800,000 tons/year Bulk Cargo (Corn, Soybean, Sunflower, Wheat, etc.) -200,000 tons/year Liquid Cargo -1000 pcs/year Container -500 units/year Vehicle	-	-	650,000 vehicles and 2,000,000 tons of general cargo handling	1,150,000 vehicles and 2,500,000 tons of general cargo handling capacity will be reached.
<b>Annual Number of Vessels</b>	50 pieces	-	-	Average 230 Ro-Ro and 200 general cargo vessels	On average, ship reception capacity is 250 on the Ro-Ro vessel side, around 300 on the general cargo ship side, and around 300 on the general cargo ship side.

## 2.2 EBRD Performance Requirements and IFC Performance Standards

Autoport is committed to implementing a Stakeholder Engagement Plan in line with the EBRD Performance Requirements (2019) and IFC Performance Standards (2012).

EBRD reference is made to PR 1, 2, 3, 4, 5, 6, and 10:

**PR 1: Assessment and Management of Environmental and Social Risks and Impacts** - this PR recognizes the importance of an integrated assessment to identify the environmental and social risks and impacts associated with projects and the client's management of environmental and social performance throughout the life of the Project.

A successful and efficient Environmental and Social Management System (ESMS) which allows for meaningful engagement between our Company, our workers, and the affected and interested stakeholders "requires a methodical systems approach comprising planning, implementing, reviewing and reacting to outcomes in a structured way to achieve a continuous improvement in performance management."

Identifying and planning to engage with stakeholders meaningfully is conducted to consider their views and concerns in planning, implementing, and operating the operation by PR 10.

**PR 2: Labour and Working Conditions** - this PR recognizes that for clients and their business activities, the workforce is an asset and that good human resources management, and a sound worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key ingredients to the sustainability of business activities.

**PR 3: Pollution Prevention and Abatement** - this PR recognizes that sustainable development is a fundamental aspect of sound business management and that the pursuit of economic growth, and a healthy environment are inextricably linked. Pollution prevention and reduction are key ingredients of a sustainable development agenda, and EBRD-financed projects must meet good international practice in this regard.

**PR 4: Community Health, Safety, and Security:** this PR recognizes that project activities, equipment, and infrastructure often bring benefits to communities, including employment, services, and opportunities for economic development. However, projects can also increase the potential for community exposure to risks and impacts arising from temporary or permanent changes in population; transport of raw and finished materials; construction, operations, and decommissioning; accidents, structural failures, and releases of hazardous materials.

**PR 5: Land Acquisition, Involuntary Resettlement, and Economic Displacement:** The application of this PR supports and is consistent with the universal respect for, and observance of, human rights and freedoms and specifically the right to adequate housing and the continuous improvement of living conditions. In cases where there has been displacement due to conflict before the EBRD's involvement, this PR supports the application of the Guiding Principles on Internal Displacement. To improve or, at a minimum, restore the livelihoods and standards of living of displaced persons to pre-project levels through measures that can be enterprise-based, wage-based, and enterprise-based, to facilitate sustainable improvements to their socioeconomic status.

PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources: EBRD recognizes the need to protect and conserve biodiversity in the context of projects it invests in.

PR10: Information Disclosure and Stakeholder Engagement - EBRD Performance Requirements (2019) includes the specific requirements for stakeholder engagement.

IFC reference is made to PS 1, 2, 3, 4, 5, 6 and 8:

PS 1: Assessment and Management of Environmental and Social Risks and Impacts: PS 1 emphasizes on the importance of: (i) an integrated assessment to identify the environmental and social impacts, risks and opportunities of the project; (ii) effective community and stakeholder engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and (iii) the client's management of social and environmental performance throughout the life of the project through management programs, monitoring, and review.

PS 2: Labour and Working Conditions: PS 2 recognises that a balance between economic growth and workers' fundamental rights is needed. The objectives are: (i) to promote a non-discriminative, equal working environment for workers; (ii) to maintain and improve the worker-management relationship; (iii) to ensure compliance with national labour and employment laws; (iv) to protect vulnerable workers; to promote a safe and healthy working environment and the health of workers; lastly, (v) to protect the workforce by addressing child labour and forced labour.

PS 3: Resource Efficiency and Pollution Prevention: PS 3 emphasizes that increasing economic activity and urbanisation may result in increased levels of pollution to air, water, and land, and consume limited resources of the Earth; of which may threaten humans and the environment at the local, regional, and global levels. The main objectives are: (i) to avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from project activities; (ii) to promote more sustainable use of resources including energy and water; and (iii) to reduce project-related greenhouse gas (GHG) emissions that contribute to climate change.

PS 4: Community Health, Safety, and Security: PS 4 recognises that project activities, equipment, and infrastructure may increase the vulnerability of communities to risks and impacts. The objectives are: (i) to anticipate and avoid adverse impacts on the health and safety of the affected community during the project life cycle; and (ii) to ensure that the safeguarding of personnel and property is carried out for the avoidance from or minimisation of risks to the affected communities.

PS 5: Land Acquisition and Involuntary Resettlement: PS 5 recognises that project-related land acquisition and restrictions on land use may have adverse impacts on communities and persons who use this land. The objectives are: (i) to avoid or minimise involuntary resettlement wherever feasible by composing alternative project designs; (ii) to avoid or minimise adverse social and economic impacts of land acquisition by providing compensation for loss of assets and ensuring that resettlement activities are implemented with appropriate consultation and disclosure; lastly, (iii) to improve or at least restore the livelihoods and living conditions of displaced communities.

PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources: PS 6 recognizes that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are key pillars for ensuring sustainable development.

The objectives are: (i) to protect and conserve biodiversity; maintain the benefits from ecosystem services; and (ii) to promote sustainably managed and used natural resources through best practices that integrate conservation and development priorities.

PS 8: Cultural Heritage: PS 8 recognises the significance of cultural heritage for current and future generations. The main two objectives are: (i) to protect the cultural heritage from the possible adverse impacts of project activities and support its preservation; and (ii) to promote equitable sharing of benefits from cultural heritage. :

**2.3 Related Internal Policies, Plans, and Procedures**

Autoport has established integrated management systems for ISO 9001:2015 Quality Management Systems, ISO 14001:2015 Environment Management Systems, and 45001:2018 Occupational Health and Safety Management Systems certified by Rina. The management systems in place are given in Table 2-2. The management systems cover Autoport activities, car loading and discharging, construction equipment, containers, and general cargo, and bonded warehouse services.

**Table 2-2. Existing Management Systems**

System-Accreditation	Certificate	Validity
ISO 9001:2015	Quality Management System Certificate	22.10.2027
ISO 14001:2015	Environmental Management System Certificate	22.10.2027
OHSAS 45001: 2018	Occupational Health and Safety Management System Certificate	22.10.2027

Autoport has prepared environmental, occupational health, and safety management-related documents to control and minimize their operations and activities' occupational health and safety impacts by the Environment, Health, and Safety Prevention Policy. The HSE performance is managed and monitored through the internal QDMS system. Occupational Health and Safety (OHS) experts and Health, Safety, and Environment (HSE) are responsible for sites recording risk assessments and reporting incidents, accidents, and non-conformity incidents. The documents that have been developed include but are not limited to port-specific operational procedures and instructions, such as:

- Crisis Intervention Procedure
- Operation Department Training Procedure
- Trade and Customer Relations Procedure
- Supply Management Procedure
- Select Risk/Opportunity Management Procedure
- Accident Incident Investigation and Reporting Procedure
- On-the-Job Meeting Procedure
- Personal Protective Equipment Identification and Use Procedure
- Waste Management Procedure

- Emergency Response Plan
- Leak Prevention and Response Procedure
- Hazardous Waste Management Procedure
- Work Permit Procedure
- Control and Audit Procedure
- Selection, Purchase, Use, Storage, Inspection and Disposal Procedure for Chain, Wire Rope, Textile Sling and Sling Components
- Mobile Harbor Crane Boom Control Procedure
- Internal Audit Procedure
- Management Review Procedure
- Process Management and Monitoring of Processes Procedure
- Customer Satisfaction Management Procedure
- Autoport Contact Procedure
- Procedure for Monitoring and Distribution of Legal Requirements
- Risk Management Procedure
- Change Management Procedure
- Conformity Assessment Procedure
- Ethics and Compliance Rules Procedure
- ISO 14001 Objectives and Management Program Table
- Autoport OHS Risk Assessment 2012
- Environmental Dimension and Impact Analysis
- Epidemic Risk Assessment

### **3. STAKEHOLDER ENGAGEMENT PROCESS OF AUTOPORT**

#### **3.1 Roles And Responsibilities**

The Project Company will have the overall responsibility and commitment to actualize effective stakeholder engagement as defined in this SEP and in line with the IFC PS1, EBRD PR10. The Company will engage personnel with roles and responsibilities given below.

The Project Manager will hold regular scheduled meetings with the Community Liaison Officer (CLO) to supervise and evaluate the quality and impact of stakeholder engagement activities. There will be monthly meetings to address and monitor any complaints received by the CLOs. Furthermore, holding meetings with the headquarters to tackle high-level complaints and explore holistic solutions. The Project manager will support the CLO in the stakeholder engagement process including communication with Public institutions

The CLO will undertake and supervise engagement with all stakeholders in relation to the Project and use available resources to ensure that the relevant activities are conducted effectively. Other responsibilities of the CLO are as follows:

- Stakeholder engagement and disclosure activities with all of the stakeholders including NGOs and public institutions
- Monitoring the grievances and requests from registration through the resolution process
- Engaging the Project workforce to raise awareness on the stakeholder engagement and grievance mechanism principles

- Preparing and managing Project-specific grievance and consultation logs for internal/external reporting use
- Preparing the Project-specific stakeholder engagement and consultation reports to be shared internally and with the Lenders
- Engaging the Project Company manager for additional measures when necessary, in order to resolve community-related issues, including measures aimed at resolving non-closed grievances
- Coordinating with parties for proper implementation of the SEP

The Site EHS manager, holds certificates issued by the Ministry of Labor and Social Security (A) Levels; the contracts with the OHS expert, workplace doctor, and health officer have been signed through the ministry webpage "e-katip" with the authorities. The responsibilities will be:

- Assess the community health and safety as well as worker and subcontractor concerns, implement the relevant management plans to provide input to the CLO
- Obtain CLO inputs to assess effectiveness of the community health and safety as well as worker and subcontractor management plans and make appropriate changes as needed
- Support the CLO during the stakeholder engagement responsibilities listed above
- Assess the supply chain management effectiveness and work with the CLO to identify and resolve stakeholder issues

The Site environmental expert position, which ensures environmental compliance via monthly visits to the Site. The responsibilities will be:

- Assess the community concerns related to environmental topics and implement the relevant management plans to provide input to the CLO
- Obtain CLO inputs to assess effectiveness of the environmental management topics
- Support the CLO during the stakeholder engagement responsibilities listed above

There is one human resources specialist on-site at the Port. The Corporate Marport HR department is responsible for establishing Corporate HR policies, and HR personnel at the port ensure that corporate policies are appropriately implemented. The corporate HR department supports the HR specialist at Autoport. The responsibilities will be:

- Manage external and internal stakeholder engagement/consultation and grievance mechanisms related to HR policies and supply chain management requirements related to labor and working conditions
- Undertake the tasks explained in the grievance mechanism section of this document and interact with CLO as well as the Site EHS manager.
- Exchange information with the CLO inputs to assess effectiveness of the HR policy and labor and working conditions

### **3.2 Stakeholder Engagement**

#### *Public Information And Participation in The EIA Process*

In accordance with the provisions of Article 9 of the Environmental Impact Assessment Regulation, a public participation meeting was organized, and the meeting location was determined by the Kocaeli Provincial Directorate of Environment, Urbanization and Climate Change. The

announcement text indicating the time, place and subject of the meeting was published in local (Bizim Yaka Kocaeli) and national newspaper (Halkın Gazetesi Birgün) on 05.04.2023. Newspaper Advertisements are given in Figure 3-2



Figure 3-1 EIA Disclosure Announcement

On 18.04.2023 at 10:00, a Public Information and Participation Meeting was held at Karşıyak Cultural Center Nikah Hall located at the address of Barbaros Mahallesi Atatürk Caddesi Ömer Çakır Sokak No:24 Başiskele District Kocaeli Province. All preparations were made to organize a presentation about the project in the hall in accordance with the provisions of the Regulation. The EIA Services Branch Manager of Kocaeli Provincial Directorate of Environment, Urbanization and Climate Change made the opening speech. Afterward, a presentation about the project was made to the participants. Photographs of the meeting are given in Figure 3-2

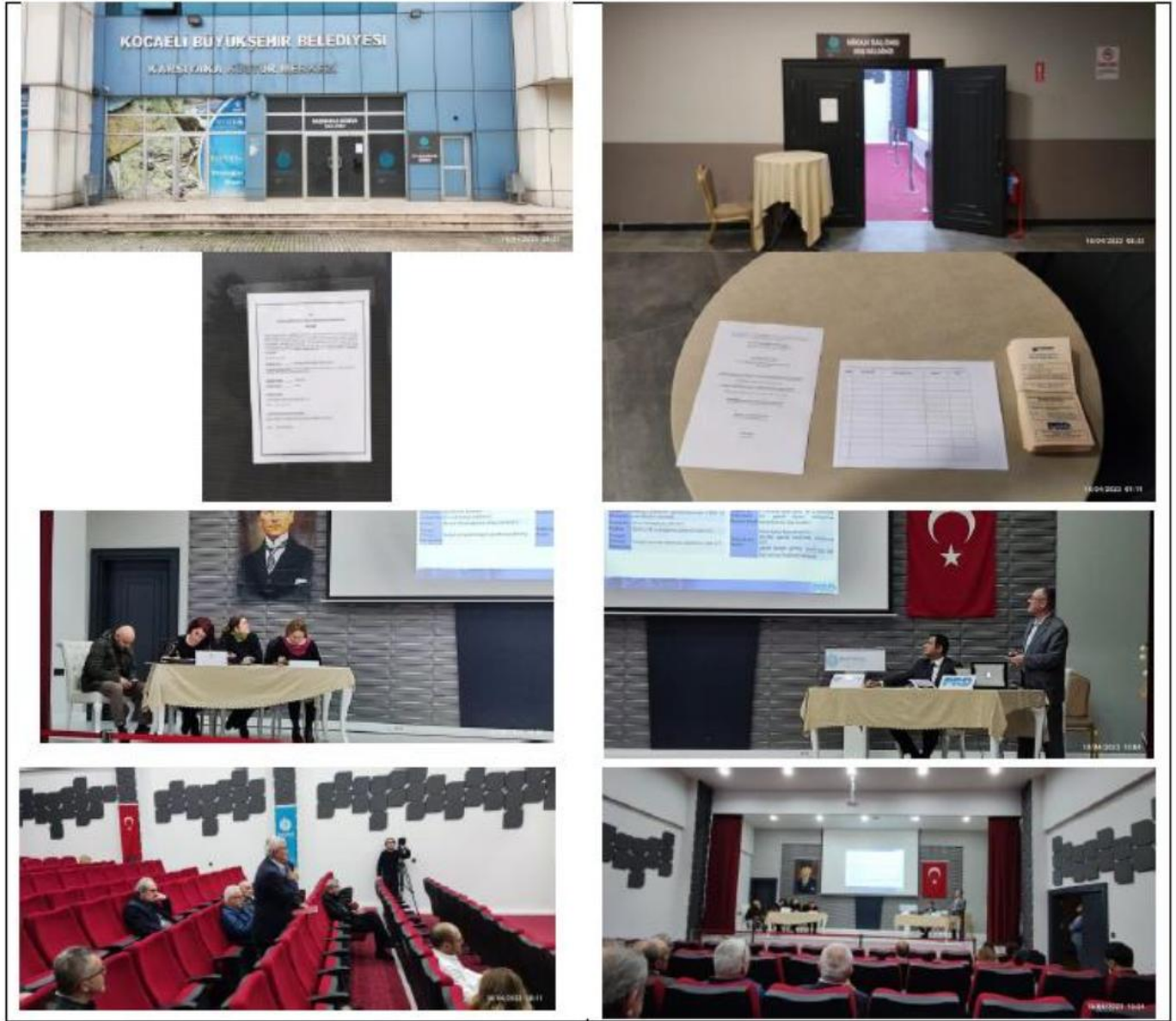


Figure 3-2 EIA Stakeholder Meeting

During the meeting, Kocaeli Provincial Directorate of Environment, Urbanization and Climate Change, Autoport, and PRD officials answered questions regarding the traffic density that will be caused by the project and the accessing to the fisherman boats. Kocaeli Provincial Directorate of Environment, Urbanization and Climate Change officials prepared minutes.

### Stakeholder Engagement during the ESA

The potential PAPs identified were the Sepetlipınar Mukhtar and the fishermen. Stakeholder engagement was conducted and the results are given below.

The Sepetlipınar Mukhtar was visited. The new mukhtar was elected in the March 2024 elections. He stated that the previous mukhtar was more familiar with Autoport Terminal Operators S.A. , as it has been operating in the region for a long time. After he became the mukhtar, Autoport Terminal Operators S.A. representatives approached him and informed him about the existing and planned activities within the Autoport Terminal Operators S.A. area.

As acknowledged by the Mukhtar, the central issue within the settlement vicinity is the heavy vehicles from all of the facilities making use of their inner settlement roads, indicating that the roads are insufficient to regulate the existing vehicle traffic. For resolution, they have approached the municipality. Upon request of the community and the municipality, a dedicated “Traffic Impact Assessment Report” has been prepared and issued by Autoport Terminal Operators S.A. for the vicinity and the entire municipal borders. An arrangement is still being expected for implementation by the municipality. The mukhtar also requested to be informed of Autoport's emergency plans and periodically about the impact of the expansion project.

According to information from the settlement neighborhood, 300-400 households are generally retired and elderly. Income is based on a pension. A primary and secondary school in the settlement serves 30 students. High school students receive their education on the nearby premises. Also, a health unit with a full-time doctor is available for daily visits. The nearest city center is 4 km away, and they do not have any difficulty accessing the goods and services provided downtown.

He also reported that they sometimes host strangers while the vessels are loading on/off, making them uncomfortable with their presence. However, this is an issue of entire business centers not being dedicated to Autoport Terminal Operators S.A. , as the Autoport Terminal Operators S.A. employees are either relocated to İzmit or have already been employed locally.

#### Fishing Activity Related Engagement

Two fishermen who used their boats near the port were interviewed. They indicated that they were informal fishers and did not have a fishing license. They knew of the expansion and indicated that they caught fish in areas that the port development would not impact. The total number of informal fishermen was indicated to be about 16. The fishermen indicated they could store their small boats east of the port area, which would not pose a problem for their fishing activities.



**KOCAELI Sportive Angling Sports Club Association**  
**Under the Ministry of Youth and Sports**  
**Izmit Industrial Site, 11th Street, 206 Block, No 39, Izmit, Kocaeli**  
**capa@oltakursunlari.com**  
**Foundation 2017**

To contribute to the development of sportive angling, develop projects, support the development of amateur fishing, and participate in and organize domestic and international fish catching competitions. Seven international competitions were organized.

Fishing is prohibited within 100 meters of ports, ship roads, and military areas.

There is no map showing the prohibited areas. It must have been prepared, but they do not have it. The Port Authority's web page lists forbidden zones and fishing zones. However, the information was shared directly with boat fishermen, not with associations.

**IMEAK** Chamber of Shipping is very active. Informative meetings, events, and collaborations are organized with the associations.

**Basiskele Fishermen Association**

**The closest association to the project area**

Establishment 2005

It was established to support fishing activities, bring together those interested in hobby and commercial fishing, and address problems and demands. The Port Authority does not provide information about fishing areas and prohibited areas. Prohibited areas are checked through third-party applications like the Garmin Boating App.

The Port Authority announces the opening of a new port. However, opening a new port is considered harmful for fishing activities. Because the area of the prohibited areas narrows, the fishing area narrows. It is seen negatively in commercial terms. Those who make a living from fishing are negatively affected. Amateur fishermen are also negatively affected because they cannot enter these areas.

Coastal fishing is done from the shore to a depth of 15-20 meters. Fishing cannot be done close to the Autoport and other ports.

There are times when the ship stays for about 2 weeks after docking. There is a demand to allow fishing during this period.

**Saraybahce Sandalcılar Association**

**Establishment 1990**

It was established to support and encourage amateur fishing. They participate in activities such as sea cleaning, protecting certain areas, and breeding ducks. They have complaints about the occupation by ports and other organizations. They think it should be developed for tourism purposes.

The Port Authority did not inform them about prohibited or hunting zones. The association itself organized an informative event for its members together with the Coast Guard Command. The map was taken from the Coast Guard. It shows how close to where and how close fishing can be done, fishing permits according to the routes and status of the vessels, etc.

**60 Evler Fishermen's Association**  
**Yavuz Sultan Mahallesi, Harikalar Sahili, No 1**  
**Establishment 1994**

Amateur fishing support, incentives, and boat support are provided.

A map was requested from the Port Authority, but it was not provided. They learned it themselves. Areas close to the nearby SafiPort harbor are used for fishing activities. They know that fishing should be done about 200 meters from the port. The Port Department called them once for information. They stated that there is little support for associations and that they mostly communicate with cooperatives. It is also very close to the military area. Tüpraş is also very close. There is activity in the area between these regions.

Fines are mostly issued by the maritime police. In this regard, the Port Authority supports reducing the fines. They are concerned about expanding the ban because they think that the existing fishing area is limited.

**Kamader**  
**Bekirdere Mahallesi, Tavsantepe Youth Park, No 15, Izmit, Kocaeli**  
**Establishment 2005**

Support marine ecology and amateur fishing, raise awareness, and create public opinion. Events are organized. The second amateur fishing association was established in Turkey. National and international competitions are organized. Competitions are held traditionally every year.

The Port Authority did not share maps of fishing and prohibited areas. Meetings are organized from time to time. Information about sea routes is given here. The Kocaeli Branch of the Chamber of Shipping is more active. They work in coordination with the Port Department. There is an opinion that ports negatively affect fishing economically. Some people make a living this way.

They have a project in the acceptance stage. This project involves shoreline and bottom cleaning, as well as fishing work, with the aim of bringing the public together through fishing and increasing the fish population.

Port areas are rich in fish populations. Banning amateur fishing in those areas is viewed negatively.

Interviews were also conducted with transport organizations (one cooperative, Yenikoy Taşıyıcılar Kooperatif, and one private entity-Müha). Both entities indicated they had been visited before the meeting and were made aware of the port expansion. They did not register any complaints.

The Port Authority was interviewed to assess the stakeholder engagement process. There is no overarching stakeholder consultation or GRM for stakeholders, particularly community members and fisherfolk who are directly/indirectly affected by port operations. conduct a consultation together with the Port Authority.

### 3.3 Stakeholder Identification

The overall aim of stakeholder identification is to prioritize project stakeholders for informed consultation and participation. Stakeholder identification is an ongoing process. The list of the identified stakeholders should be assessed and updated according to the grievance mechanism's outputs, the Project's different phases, and the Project updates. In this way, Autoport guarantees a transparent and accessible engagement process for everyone through a stakeholder engagement strategy, Autoport has:

- Determined all project stakeholders; while doing so, it examines all the stakeholders at all levels, from the local community and public institutions to national and international stakeholders.
- Planned management of the relationship with stakeholders, the impact of stakeholder engagement on the Project, the means of communication, and contact frequency for the stakeholders.
- Performed active stakeholder communication at a local level to mitigate the possible negative effects of the Project for the project-affected communities and allow the local communities to benefit from the potential positive impact of the Project.
- Recorded the stakeholders' complaints and demands and provide feedback to demanding and complaining stakeholders as soon as possible.
- Developed methods for especially vulnerable/disadvantaged groups/individuals to ensure local access to the Project in the stakeholder participation.
- Tracked culturally appropriate style and method in all communication.
- Created opportunities for stakeholder engagement by using different communication channels to ensure the effective participation of stakeholders.
- Allowed other groups affected by the Project, particularly nongovernmental organizations (NGOs), to express their opinions on the proposed actions during the Project's life cycle.
- Identified a detailed action plan by preparing Stakeholder Engagement Plan, especially for the Project, and ensures monitoring and reporting of procedures since the scope of the project and local needs change for each specific Project.

In general, stakeholders can be categorized into two groups.

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

Thanks to this separation, stakeholders involved in the Autoport and other stakeholders can be indicated how they affect or are affected by the Project. The stakeholder analysis describes the roles of the internal stakeholders in the Project, institutional stakeholder participation, and their involvement. In the analysis of external stakeholders, the role of stakeholders, method, frequency, and subject of the relationships to be established with stakeholders during the Project are discussed.

As part of the stakeholder identification process, it is also important to identify individuals and groups (disadvantaged/vulnerable individuals and groups) who may be differently affected by projects or experience difficulties in accessing project information and have their concerns registered because of their disadvantaged or vulnerable situation. Special attention will be given to vulnerable groups in the stakeholder engagement process. It will also consider whether women need to be consulted in a particular way to capture their views fully.

The following categories of stakeholders have been identified as those affected by or potentially interested in the Project:

- Government Authorities (e.g., the Republic of Turkey, relevant ministries, municipalities, and other relevant local authorities).
- Local Public Administration
- Lenders
- NGOs' international, national, and local including professional organisations in the maritime sector
- Education and training institutions (e.g., Universities, colleges, think tanks).
- Business environment and individuals directly interested in the Project and activity, e.g., Goods and services suppliers, contractors, customers, and dealers
- Project Affected Persons (PAPs) Communities (e.g., affected settlements, local community groups)
- Employees, including employee representatives and Trade Union
- Company Shareholders, Investors
- Media.

The Company's key stakeholders are local communities, consumers, employees, shareholders, suppliers, services and retailers, trade unions, public institutions, sector institutions, and nongovernmental organizations (NGOs).

### 3.4 Stakeholder Groups

The table below represents the identified stakeholders per the above classification.

**Table 3-1 Stakeholder Groups of Autoport**

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
<b>External Stakeholders</b>		
<p><b>National Institutions:</b> National Government is of primary national political importance to the business and/or projects/activities in establishing policy, granting permits or other approvals, and monitoring and enforcing compliance throughout all stages of the Project or activity life cycle.</p>	<ul style="list-style-type: none"> <li>• Ministry of Environment, Urbanization, and Climate Change</li> <li>• Ministry of Labor and Social Security</li> <li>• Ministry of Transportation and Infrastructure</li> <li>• Ministry of Transport Directorate General for maritime affairs</li> <li>• Ministry of Transportation and Infrastructure, General Directorate of Infrastructure,</li> </ul>	<ul style="list-style-type: none"> <li>• Policy formulation Permitting /Regulation</li> </ul>

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
	<ul style="list-style-type: none"> <li>• Ministry of Transportation and Infrastructure, General Directorate of Transportation Services Regulation</li> <li>• General Directorate of Coastal Safety</li> </ul>	
<p><b>Local Institutions</b> Local government is important to the business and/or Project as they are responsible for implementing legislation and development plans and policies at the municipal or commune level. In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area to consider the Project activities in their policymaking, regulatory and other duties, and activities.</p>	<ul style="list-style-type: none"> <li>• Kocaeli Governorships</li> <li>• Provinces Municipalities</li> <li>• Provincial Directorate of Environment, Urbanization, and Climate Change</li> <li>• Provincial Directorate of Labor and Social Security</li> <li>• Provincial Directorate of Transportation and Infrastructure</li> <li>• Port Authorities</li> <li>• Customs directorate</li> <li>• Gendarmerie – Police Departments– Police Stations,</li> </ul>	<ul style="list-style-type: none"> <li>• Social and economic development,</li> <li>• Corporate Social Responsibility,</li> <li>• Management of environmental and social impacts</li> <li>• Permitting /Regulation</li> </ul>
<p><b>Lenders</b></p>	<p>International finance institutions such as EBRD and IFC</p>	<ul style="list-style-type: none"> <li>• Project Finance</li> <li>• Environmental and social impacts</li> </ul>
<p><b>NGOs</b> international, national, and local NGOs with a direct interest in the Project and/or activity &amp; associated facilities and their social and environmental aspects can influence the Project and/or activity directly or through public opinion.</p>	<ul style="list-style-type: none"> <li>• Kocaeli Chamber of Industry</li> <li>• United Nations Global Compact</li> <li>• UTIKAD (International Transport and Logistics Service Providers Association)</li> <li>• UND (International Transport Association)</li> <li>• Logistics Platform</li> <li>• TÜRKLİM (Turkish Port Association)</li> <li>• Kocaeli Chamber of Commerce</li> <li>• Kosbas - Kocaeli Free Zone</li> <li>• Chamber of Shipping (Kocaeli Branch)</li> <li>• Kocaeli Fisheries Cooperatives Union and Kocaeli Sportive Amateur Anglers and Wildlife Protection Association (KAMADER).</li> <li>• Turkish Marine Research Foundation (TUDAV), WWF Türkiye).</li> </ul>	<ul style="list-style-type: none"> <li>• Management of Environmental and Social impacts,</li> <li>• Corporate Social Responsibility</li> <li>• Environmental and social impacts</li> <li>• Economic development</li> <li>• Inclusivity and accessibility</li> <li>• Security impacts</li> </ul>
<p><b>Education Institutions</b></p>	<ul style="list-style-type: none"> <li>• Kocaeli University</li> <li>• Yenikoy Sepetlipinar Elementary and Middle school</li> </ul>	<ul style="list-style-type: none"> <li>• Technical Consultancy</li> <li>• Corporate Social Responsibility</li> <li>• Capacity Building</li> </ul>
<p><b>Business Environment:</b> Businesses and individuals directly interested in the Project and/or activity, e.g., running businesses or providing services and supplies to the Company.</p>	<ul style="list-style-type: none"> <li>• Boğaz Liman Hizmetleri Tahmil Tahliye İthalat Ve İhracat Limited Şirketi- Ro-Ro Operations Loading/Unloading Service</li> <li>• Pala Liman Hiz.Tahmil Tahliye Nak. General Cargo Operations Loading/Unloading Services</li> <li>• Özüaydin Vinç Ve Liman İşletmeciliği A.Ş. Operator Service</li> <li>• C.A.R. Otomotiv Danışmanlık A.Ş. Survey Service</li> </ul>	<ul style="list-style-type: none"> <li>• Supply of Goods Services</li> <li>• Marketing and sales networking</li> <li>• Economic</li> </ul>

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
	<ul style="list-style-type: none"> <li>• Nwg Servis Hizmetleri Tic. A.Ş. Operator Supply Service</li> <li>• Service Contractors</li> <li>• Tepe Savunma Ve Güvenlik Sistemleri San. A.Ş.-security</li> <li>• Sofra Yemek Üretim Ve Hizmet A.Ş.- food</li> <li>• ISS Yönetim Hizmetleri A.Ş.- facility management</li> <li>• Project Developers and Investors</li> <li>• Local Enterprises and small businesses</li> <li>• Customers</li> </ul>	
<b>Media</b>	<ul style="list-style-type: none"> <li>• Basiskelemedya</li> <li>• Nokta Gazetesi</li> <li>• Ozgur Kocaeli Gazetesi</li> <li>• Tek Kocaeli Gazetesi</li> <li>• Izmit TV</li> <li>• Kocaeli TV</li> <li>• National newspapers</li> <li>• TV channels</li> <li>• Social media, Twitter, linked-in, and Facebook</li> </ul>	<ul style="list-style-type: none"> <li>• Relaying correct Project information to communities</li> <li>• Advertisements</li> </ul>
<b>Project Affected Persons (PAPs)</b> Households and communities that may be directly or indirectly affected by the Project and/or activity. This includes people living on land affected by the Project and/or activity.	<ul style="list-style-type: none"> <li>• Basiskele Municipality</li> <li>• Sepetlipinar Neighborhood Head</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Downstream Impact / Community Health &amp; Safety Management of environmental and social impacts,</li> <li>• Corporate Social Responsibility</li> </ul>
<b>Internal Stakeholders</b>		
<b>Company Shareholders, Investors</b>	Autoport Shareholders	<ul style="list-style-type: none"> <li>• Reputation regarding Environmental and Social Business growth and shareholder value</li> </ul>
<b>Employees</b>	Autoport Employees Contractors and their Employees	<ul style="list-style-type: none"> <li>• Labor and working conditions.</li> <li>• Local procurement</li> <li>• Environmental and social impacts</li> </ul>

### 3.5 Engagement Tools

To maximize the effectiveness of the engagement action plan, consistent use of best practice tools tailored to the local context and stakeholders is needed.

**Table 3-2 Stakeholder Engagement Tools**

Tool	Description
Company website	The Company website <a href="https://www.autoport.com.tr/">https://www.autoport.com.tr/</a> will provide relevant and up-to-date information regarding construction works and operational aspects. Project NTS, ESAP, and SEP prepared as part of the environmental and social review package, will be accessible online and offline to all interested stakeholders. The description of the External Grievance Form will be made available to the Public on the web.
Instagram	Instagram account for frequent updates <a href="https://www.instagram.com/autoportliman?igsh=bnk1cjd2dHVoc3d2">https://www.instagram.com/autoportliman?igsh=bnk1cjd2dHVoc3d2</a>
Brochures and leaflets	Printed brochures or leaflets supporting information and awareness campaigns. Also to be provided in <a href="https://www.autoport.com.tr/">https://www.autoport.com.tr/</a>
Electronic and postal mail	Subscription emails and postal letters exchanges. Autoport email is <a href="mailto:autoport@autoport.com.tr">autoport@autoport.com.tr</a>
Regular Internal Reporting	Regular reports will be prepared for the Management team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or noncompliance to the requirements of this SEP, planned activities for the next reporting period, and any other issues of potential concern.
Reporting to Stakeholders	Project updates to different stakeholder groups if needed. A Sustainability Report, including reporting on the Company's environmental and social performance of the Company will be published following completion of investment and disseminated in local communities via local authorities and partners. The report will be published in <a href="https://www.autoport.com.tr/">https://www.autoport.com.tr/</a>

#### 4. STAKEHOLDER ENGAGEMENT APPROACH AND ACTIVITIES

Autoport will maintain an open-door policy around stakeholder engagement. This SEP and relevant social & environmental policies and documentation will be disclosed at <https://www.autoport.com.tr>. Following the analysis of its stakeholders, Autoport has identified the communication platforms and methods, communication frequency, and target and evaluation criteria to measure the success of stakeholder engagement as part of the topics highlighted during the stakeholder analysis. Autoport will continuously communicate with internal and external stakeholders through various channels, as outlined in **Hata! Başvuru kaynağı bulunamadı.** for construction phase related activities and Table 4-2 during operation (including construction phase for normal port operations). The level of impact, in addition to the stakeholders' needs and concerns, determines the basis of the communication tools and methods selected to engage with certain groups. The engagement activities will be conducted in a culturally appropriate manner and will include the best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement. The language of communication throughout the Project is expected to be Turkish; however, different languages will also be considered, if necessary, to increase the efficiency of the engagement activities and ensure the involvement of all stakeholder groups.

Table 4-1 Stakeholder Engagement Methods for Construction

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
<b>National Institutions</b>	<ul style="list-style-type: none"> <li>• Permitting</li> <li>• Policy formulation</li> <li>• Institution legal requirements other than permitting</li> <li>• Specific views about the design, construction, and operation activities of the Project</li> </ul>	Communication with authorities follows established procedures in line with regulations. Communication takes place through the following distribution channels: <ul style="list-style-type: none"> <li>• Internal and External Reports</li> <li>• Project-based Audits</li> </ul>	<ul style="list-style-type: none"> <li>• Every year</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with national regulations concerning EIA obligations</li> <li>• Official correspondence recorded.</li> </ul>
<b>Local Institutions</b>	<ul style="list-style-type: none"> <li>• Permitting</li> <li>• Policy Formulation</li> <li>• Institution legal requirements other than permitting</li> <li>• Specific views about the design, construction, and operation activities of the Project</li> </ul>	Communication with authorities follows established procedures in line with regulations. Communication takes place through the following distribution channels: <ul style="list-style-type: none"> <li>• Internal and External Reports</li> <li>• Project-based Audits</li> </ul>	<ul style="list-style-type: none"> <li>• Every year</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Compliance with national regulations concerning EIA obligations</b></li> <li>• <b>Official correspondence recorded.</b></li> </ul>
<b>Lenders</b>	<ul style="list-style-type: none"> <li>• Compliance with Legal E&amp;S requirements</li> <li>• Changes to the Project impacting E&amp;S requirements</li> <li>• ESAP status discussions</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and External Reports</li> <li>• Social Media, Corporate Websites</li> </ul>	<ul style="list-style-type: none"> <li>• Third-party monitoring Audits</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with international requirements and ESAP conditions</li> </ul>
<b>NGOs-especially with</b> <ul style="list-style-type: none"> <li>• <b>Fishermen associations</b></li> <li>• Turkish Marine Research Foundation (TUDAV),</li> <li>• WWF Turkiye).</li> </ul>	<ul style="list-style-type: none"> <li>• Obtaining project-related views</li> <li>• E&amp;S information sharing during the construction and operation phases in line with NGO issues of interest</li> <li>• Obtain updated information about fisherfolks fishing close to the port area, impacts on fishing safety</li> <li>• Support development/implementation of conservation programs within the Marmara Sea and Islands Specially Protected Area (SPAMI)</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and External Reports related to management plans and specifically on biodiversity management plan</li> <li>• Social Media, Corporate Websites</li> <li>• Internal and external meetings, assessments, and announcements</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction</li> <li>• During construction and dredging (every six months)</li> <li>• After completion or dredging and disposal at sea</li> <li>• Continuously monitor NGOs activities to Project and undertake engagement as necessary</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing stakeholder engagement in management plan <b>implementation</b></li> <li>• Grievances received and processed</li> </ul>

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
<b>Business Environment</b>	<ul style="list-style-type: none"> <li>• Collaboration for emergency responses in the port area, traffic management</li> </ul>	<ul style="list-style-type: none"> <li>• Company website</li> <li>• Communication with potential partners takes place through the following communication channels:                             <ul style="list-style-type: none"> <li>○ meetings with the administration /</li> <li>○ representatives of the Procurement Department</li> <li>○ Business associations.</li> <li>○ tenders for the purchase of services or goods</li> <li>○ letters, press releases</li> <li>○ public events</li> <li>○ email, phone.</li> </ul> </li> <li>• Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction</li> <li>• During construction and dredging (every six months)</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Increasing stakeholder engagement in management plan implementation</b></li> <li>• Grievances received and resolved</li> </ul>
<b>Media</b>	<ul style="list-style-type: none"> <li>• Project related public disclosure and consultation</li> <li>• Feedback from media on project</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and External Reports, leaflets</li> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Social Media, Corporate Websites,</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction</li> <li>• During construction and dredging (every six months)</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Informing Public accurately</li> <li>• Increasing Company reputation and brand value</li> <li>• Monitoring of news coverages in conventional and social media</li> </ul>
<b>Local Public (includes Project Affected Persons (PAPs and fishermen))</b>	<ul style="list-style-type: none"> <li>• Community health and safety information sharing such as traffic management, noise, change in access to business/school/home</li> <li>• Project employment,</li> <li>• Project progress</li> <li>• Information sharing with fishermen on construction and operation activities</li> </ul>	<ul style="list-style-type: none"> <li>• Project Based</li> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Specific one to one meeting for vulnerable groups</li> <li>• Delivery of ESAP and management plans i.e. dredging management plan, CHS plan</li> <li>• Grievance Management</li> <li>• Social Media, Corporate Websites</li> </ul> <p>Communication with residents around Company operations and activities is performed through the local municipality and village councils or other relevant bodies and is subject to comment by the Public involved.</p> <p>Local communication will focus on the disclosure of routine information, meetings with relevant authorities and councils if needed, and use of the grievance mechanism;</p> <p>Special measures will be taken for fishermen as:</p> <ul style="list-style-type: none"> <li>• Engagement and tailored information disclosure,</li> <li>• management of impacts through ESAP, dredging management plan and livelihood restoration plan assessment</li> <li>• effective employment of grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to construction</li> <li>• During construction and dredging (every three months)</li> <li>• Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<p>Sustaining continuous, open, transparent, and constructive communication on project-based issues</p> <p>Grievances received and resolved including GBVH complaints</p> <p>Sustaining open communication with neighboring Plants on downstream impacts</p> <p>Monitoring of ESAP and management plans</p> <p>Monitoring of impacts management and grievance management for fishermen</p>
<b>Employees</b>	<ul style="list-style-type: none"> <li>• <b>Information sharing on ESAP, HR policy, management plans i.e., OHS, traffic management plans and associated inductions/trainings required by ESAP and management plans i.e., on</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Implementation of ESAP, HR policy, management plans i.e., OHS, traffic management plans and associated inductions/trainings required by ESAP and management plans i.e., on freedom to organization, GBVH etc.</b></li> <li>• <b>Strengthening worker representation and engagement Memorandums (Special day celebrations, important matters)</b></li> <li>• <b>Special Day Events (Digital)</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Quarterly</b></li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring meaningful consultation mechanisms with the employees</li> <li>• Ensuring accessible feedback mechanism for the employees' opinions and grievances, grievances resolved including GBVH complaints</li> <li>• Increasing employee engagement &amp; satisfaction</li> </ul>

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
	<ul style="list-style-type: none"> <li>freedom to organization, GBVH etc.</li> <li>Information sharing related Project related E&amp;S topics</li> <li>Issues related to Workers Labor topics</li> </ul>	<ul style="list-style-type: none"> <li>Internal and External Reports</li> <li>Social Responsibility Platforms and Clubs</li> <li>Social Media, Corporate Websites</li> <li>Internal and external training and assessments</li> <li>Grievance mechanism including GBVH complaints</li> <li>Ethical guidelines and ethics line</li> <li>The effectiveness of communication with employees is measured with the Employee Engagement Survey (ÇBA)</li> </ul>		<ul style="list-style-type: none"> <li>Monitoring of ESAP and management plan implementation</li> <li>Representation of workers in governance</li> <li>Providing a safe working environment and conditions in line with OHS requirements</li> </ul>

Table 4-2 Stakeholder Engagement Methods for Operation

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
<b>National Institutions</b>	<ul style="list-style-type: none"> <li>Permitting</li> <li>Policy formulation</li> <li>Institution legal requirements other than permitting</li> <li>Specific views about the design, construction, and operation activities of the Project</li> </ul>	<p>Communication with authorities follows established procedures in line with regulations. Communication takes place through the following distribution channels:</p> <ul style="list-style-type: none"> <li>Internal and External Reports</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Social Media, Corporate Websites,</li> <li>Project-based Audits</li> </ul>	<ul style="list-style-type: none"> <li>Once a year (within October of each year)</li> <li>Based on review new regulations and then undertaking engagement as necessary</li> <li>Whenever changes occur for Project-related relevant E&amp;S</li> </ul>	<ul style="list-style-type: none"> <li>Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues</li> <li>Compliance with national regulations</li> <li>Number of visits conducted.</li> <li>Official correspondence recorded.</li> </ul>
<b>Local Institutions</b>	<ul style="list-style-type: none"> <li>Permitting</li> <li>Policy Formulation</li> <li>Institution legal requirements other than permitting</li> <li>Specific views about the design, construction, and operation activities of the Project</li> </ul>	<p>Communication with authorities follows established procedures in line with regulations. Communication takes place through the following distribution channels:</p> <ul style="list-style-type: none"> <li>Internal and External Reports</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Social Media, Corporate Websites,</li> <li>Project-based Audits</li> </ul>	<ul style="list-style-type: none"> <li>Once a year (within October of each year)</li> <li>Based on review new regulations and then undertaking engagement as necessary</li> <li>Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues</li> <li>Compliance with national regulations</li> <li>Number of visits conducted.</li> <li>Official correspondence recorded.</li> </ul>
<b>Lenders</b>	<ul style="list-style-type: none"> <li>Compliance with Legal E&amp;S requirements</li> <li>Changes to the Project impacting E&amp;S requirements</li> <li>ESAP status discussions</li> </ul>	<ul style="list-style-type: none"> <li>Internal and External Reports</li> <li>Social Media, Corporate Websites</li> </ul>	<ul style="list-style-type: none"> <li>Once a year (date arranged with Lenders)</li> <li>Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Sustaining continuous, open, and transparent communication on environmental &amp; social &amp; technical, and financial issues of construction and operations</li> <li>Compliance with international requirements</li> <li>Company credibility and financial sustainability</li> </ul>
<b>NGOs</b>	<ul style="list-style-type: none"> <li>Obtaining Project related views</li> <li>Information sharing during the construction and operation phases in line with NGO issues of interest</li> </ul>	<ul style="list-style-type: none"> <li>Internal and External Reports</li> <li>Social Media, Corporate Websites</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Project</li> <li>Memberships</li> <li>Donations and sponsorship</li> <li>Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>Once a year (within October of each year)</li> <li>Continuous monitor NOGs activities to Project and undertake engagement as necessary</li> </ul>	<ul style="list-style-type: none"> <li>Increasing stakeholder engagement in Company's corporate social responsibility topics</li> <li>Grievances received and processed</li> </ul>

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
		•		
<b>Education Institutions</b>	<ul style="list-style-type: none"> <li>• Project related public disclosure and consultation</li> <li>• Feedback from university on project</li> </ul>	<ul style="list-style-type: none"> <li>• Career Days</li> <li>• Training, Employee loyalty and client research</li> <li>• Coaching to students and internship</li> <li>• Social Media, Corporate Websites</li> </ul>	<ul style="list-style-type: none"> <li>• Once a year (within October of each year)</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring collaboration and information sharing with the universities through Joint Projects</li> <li>• Ensuring collaboration with schools at the local level for Social Projects on education</li> </ul>
<b>Business Environment</b>	<ul style="list-style-type: none"> <li>• Collaboration for emergency response in the port area, traffic management</li> <li>• Information Delivery of goods &amp; services</li> <li>• Seeking Opportunities for cooperation with businesses related to the Company's activities,</li> </ul>	<ul style="list-style-type: none"> <li>• Company website</li> <li>• Communication with potential partners takes place through the following communication channels:                             <ul style="list-style-type: none"> <li>○ meetings with the administration /</li> <li>○ representatives of the Procurement Department</li> <li>○ Business associations.</li> <li>○ tenders for the purchase of services or goods</li> <li>○ letters, press releases</li> <li>○ public events</li> <li>○ email, phone.</li> </ul> </li> <li>• Grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>• Once a year (within October of each year)</li> <li>• Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting the development of local suppliers</li> <li>• Delivery of goods &amp; services on time</li> <li>• Giving priority to local procurement</li> <li>• Increasing the opportunities to make a cooperation with businesses related to the Company's activities,</li> <li>• Grievances received and resolved</li> </ul>
	Customers	<ul style="list-style-type: none"> <li>• Collaboration for emergency response in the port area, traffic management</li> <li>• E&amp;S information sharing for Autoport Information Delivery of goods &amp; services</li> <li>• Seeking Opportunities for cooperation with businesses related to the Company's activities,</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and External Reports</li> <li>• Training, Employee loyalty and client research</li> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Social Media, Corporate Websites</li> <li>• Ethical guidelines</li> <li>• Customer Communication Tools Table</li> <li>• Customer satisfaction surveys (MMA), were followed by the customer voice management project (VOC Management)</li> </ul>	
Suppliers	<ul style="list-style-type: none"> <li>• Expectation of Supply chain management systems</li> <li>• Prevention of forced labor and child labor</li> </ul>	<ul style="list-style-type: none"> <li>• Assessments and monitoring of E&amp;S standards through supply chain management system</li> <li>• Internal and External Reports</li> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Social Media, Corporate Websites</li> <li>• Grievance Management system</li> </ul>	<ul style="list-style-type: none"> <li>• Once a year (within October of each year)</li> <li>• Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting the development of local suppliers</li> <li>• Delivery of goods &amp; services on time</li> <li>• Supplier monitoring</li> <li>• Grievances received and resolved</li> </ul>
Business Partners	<ul style="list-style-type: none"> <li>• Opportunities for cooperation</li> <li>• Contractor performance</li> <li>• Expectation of Supply chain management systems</li> <li>• E&amp;S information sharing for Autoport</li> </ul>	<ul style="list-style-type: none"> <li>• Assessments and monitoring of E&amp;S standards through the supply contractor management system</li> <li>• Internal and External Reports</li> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Ethical Guideline</li> <li>• Social Media, Corporate Websites</li> <li>• Grievance Management system</li> </ul>	<ul style="list-style-type: none"> <li>• Once a year (within October of each year)</li> <li>• Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing the opportunities to make a cooperation with businesses related to the Company's activities,</li> <li>• Contractor assessments/audits</li> <li>• Grievances received and resolved</li> <li>•</li> </ul>

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
<b>Media</b>	<ul style="list-style-type: none"> <li>Project related public disclosure and consultation</li> <li>Feedback from media on project</li> </ul>	<ul style="list-style-type: none"> <li>Internal and External Reports, leaflets</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Social Media, Corporate Websites,</li> </ul>	<ul style="list-style-type: none"> <li>Once a year (within October of each year)</li> </ul>	<ul style="list-style-type: none"> <li>Informing Public accurately</li> <li>Increasing Company reputation and brand value</li> <li>Monitoring of news coverages in conventional and social media</li> </ul>
<b>Local Public (includes Project Affected Persons (PAPs and fishermen))</b>	<ul style="list-style-type: none"> <li>Community health and safety information sharing such as traffic management, noise</li> <li>Project employment,</li> <li>Project progress</li> <li>Information sharing with fishermen on construction and operation activities</li> </ul>	<ul style="list-style-type: none"> <li>Internal and External Reports, leaflets</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Social Media, Corporate Websites,</li> </ul>	<ul style="list-style-type: none"> <li>Every six months</li> <li>Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<p>Sustaining continuous, open, transparent, and constructive communication on project-based issues</p> <p>Grievances received and resolved including GBVH complaints</p> <p>Sustaining open communication with neighboring Plants on downstream impacts</p> <p>Monitoring of ESAP and management plans</p> <p>Monitoring of impacts management and grievance management for fishermen</p>
<b>Company Shareholders</b>	<ul style="list-style-type: none"> <li>Project Based</li> <li>Internal and external meetings, assessments, and announcements</li> <li>Specific one to one meeting for vulnerable groups</li> <li>Delivery of ESAP and management plans i.e. , CHS plan,</li> <li>Grievance Management</li> <li>Social Media, Corporate Websites</li> </ul> <p>Communication with residents about company operations and activities is performed through the local municipality and village councils or other relevant bodies and is subject to comment by the public involved.</p> <p>Local communication will focus on the disclosure of routine information, meetings with relevant authorities and councils</p>	<ul style="list-style-type: none"> <li>Annual Report and Sustainability Report</li> <li>Investor and analyst presentations</li> <li>Material Disclosure</li> <li>Financial result evaluation meetings</li> <li>One-on-one meetings</li> <li>General Assembly meetings</li> <li>Working groups</li> <li>Project partnerships</li> <li>Report</li> </ul>	<p>Construction progress is reported to senior management every month. Weekly construction coordination meetings discuss both positive and negative developments.</p>	<ul style="list-style-type: none"> <li>Ensuring accurate communication flow</li> <li>Sharing technical &amp; financial &amp; environmental &amp; social performance transparently</li> <li>Managing Social &amp; environmental &amp; economic sustainability</li> </ul>

Stakeholder Group	Engagement Topics-Issues	Stakeholder Communication Platforms and Methods	Communication Frequency for information related to Engagement topics-Issues	Targets and Successful Self-Evaluation Criteria
	<p>if needed, and use of the grievance mechanism;</p> <p>Special measures will be taken for fishermen as:</p> <ul style="list-style-type: none"> <li>• Engagement and tailored information disclosure,</li> <li>• management of impacts through ESAP, and livelihood restoration plan assessment</li> <li>• effective employment of grievance mechanism</li> </ul>			
<b>Employees</b>	<ul style="list-style-type: none"> <li>• Information sharing on ESAP, HR policy, management plans i.e., OHS, traffic management plans and associated inductions/trainings required by ESAP and management plans i.e., on freedom to organization, GBVH etc.</li> <li>• Information shaing relatedProject related E&amp;S topics</li> <li>• Issues related to Workers Labor topics</li> </ul>	<ul style="list-style-type: none"> <li>• Implementation of ESAP, HR policy, management plans i.e., OHS, traffic management plans and associated inductions/trainings required by ESAP and management plans i.e., on freedom to organization, GBVH etc.</li> <li>• Strengthening worker representation and engagement Memorandums (Special day celebrations, important matters)</li> <li>• Special Day Events (Digital)</li> <li>• Internal and External Reports</li> <li>• Social Responsibility Platforms and Clubs</li> <li>• Social Media, Corporate Websites s</li> <li>• Internal and external training and assessments</li> <li>• Grievance mechanism including GBVH complaints</li> <li>• Ethical guidelines and ethics line</li> <li>• The effectiveness of communication with employees is measured with the Employee Engagement Survey (ÇBA)</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Quarterly</li> <li>• Whenever changes occur for Project-related E&amp;S relevant to the stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring meaningful consultation mechanisms with the employees</li> <li>• Ensuring accessible feedback mechanism for the employees' opinions and grievances, grievances resolved including GBVH complaints</li> <li>• Increasing employee engagement &amp; satisfaction</li> <li>• Monitoring of ESAP and management plan implementation</li> <li>• Representation of workers in governance</li> <li>• Providing a safe working environment and conditions in line with OHS requirements</li> </ul>
Group Companies	<ul style="list-style-type: none"> <li>• Information sharing on Project Progress</li> <li>• Issues related to E&amp;S and regulatory compliance</li> <li>• Lenders reporting topics related to E&amp;S</li> </ul>	<ul style="list-style-type: none"> <li>• Internal and external meetings, assessments, and announcements</li> <li>• Ethical guidelines</li> <li>• Internal communication platforms</li> <li>• Social Media, Corporate Websites</li> </ul>	<ul style="list-style-type: none"> <li>• Once a year (within October of each year)</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring meaningful consultation mechanisms with group employees</li> <li>• Ensuring accessible feedback mechanism for the group employees' opinions and grievances</li> <li>• Increasing group employee engagement &amp; satisfaction</li> </ul>

## 5. GRIEVANCE MECHANISM

EBRD and IFC recommend using a transparent and effective mechanism to process stakeholder grievances in their projects. These mechanisms help to resolve these situations by listening to the grievances of stakeholders affected by the adverse impacts of project activities and offering solutions. Autoport are committed to fulfilling EBRD and IFC requirements for internal and external grievance mechanisms.

Autoport grievance mechanisms, designed with stakeholder engagement in mind, include the following key features:

**Legitimate:** A mechanism must have clear, transparent, and sufficiently independent governance structures to ensure that no party to a particular grievance process can interfere with the fair conduct of that process.

**Accessible:** A mechanism must be publicized to those who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers to access, including language, literacy, awareness, finance, distance, or fear of reprisal.

**Predictable:** A mechanism must provide a clear and known procedure, with time limits for each stage; clarity on the types of process and the outcome it can (and cannot) offer; and means of monitoring the implementation of any outcome.

**Equitable:** A mechanism must ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.

**Rights-based:** A mechanism must ensure its outcomes and remedies meet internationally recognized human rights standards.

**Transparent:** A mechanism must provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

**Anonymity:** A mechanism should provide means by which all individuals can raise anonymous complaints. This gives the applicants confidence that they will not be retaliated (see below) against for raising concerns.

### 5.1 External Grievance Mechanism:

The External Grievance Mechanism is in place and enables any stakeholder to make a grievance about the way the Project is being designed or implemented. Grievances may be specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

To establish healthier grievance management, a grievance mechanism that can be accessible to all project stakeholders should be implemented. Autoport will be responsible for the management of the grievances.

Any individual or organization may make inquiries and/or lodge complaints personally. The following communication channels could be used for lodging grievances:

In Person:                      Eda Gür

Mailautoport@autoport.com.tr

Website: <https://www.autoport.com.tr/iletisim.html>

Phone : : (0262) 315 38 00

Official Letter: Sepetlipınar Mahallesi Arpalık Caddesi No:100 Başiskele  
KOCAELİ

The step-by-step external grievance mechanism process is given below:

*Step 1 - Submission of a complaint:* Receiving grievance by any communication channel explained above. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment abuse, or Gender Based Violence (GBV), immediate action will be taken within 48 hours of receiving the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment at the workplace or any potential child abuse in the project sites, the complaint will be directed to relevant legal authorities/service providers such as the Ministry of Family and Social Services and Prosecutors Office.)

*Step 2 - Registration of complaint:* Registering/recording by entering the sample grievance register table (see Annex-B) within two days and filling out the Grievance Form (see Annex-A). All the complaints will be registered within two working days, and feedback will be given to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously, and the request will be met.

*Step 3 - Forwarding of complaint:* The complaint is forwarded to the relevant persons (relevant department of Autoport) responsible for managing the complaint in not later than three working days upon receiving the complaint (except for any emergent complaint, which would be managed as appropriate).

*Step 4 - Evaluation of a complaint:* Evaluate the complaints within ten working days and determine whether the complaint meets the admissibility criteria. If the complaint is not valid, provide relevant explanation to the complainant.

*Step 5 - Response for a complaint:* If the complaint is valid, identify and take corrective measures to resolve it not later than 15 working days after receiving it. If resolving the complaint would take longer, a partial response could be provided to the complainant and fill out the Grievance Closeout Form (see Annex A). All comments and complaints will be responded to either verbally or in writing by the preferred method of communication specified by the complainant if contact details of the complainant are provided. At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the Autoport website so that anonymous complainants are informed about their complaints and the results.

*Step 6 - Recording the result of a complaint:* Recording the result in the register table (see Annex B).

*Step 7 - Right to Appeal:* Applicants can always apply to relevant legal institutions if the complaint cannot be resolved with the existing process. Such institutions can be summarized as follow:

- Civil Courts of First Instance
- Administrative Courts

- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

## 5.2 Internal Grievance Mechanism

Grievances should be reviewed as soon as possible to prioritize resolution. Regardless of general response and resolution time limits, some grievances may require immediate attention, for example, where it concerns the livelihood of workers. Employees can report any issues they encounter related to ethical and compliance rules either verbally or in writing to the Autoport Ethics Line or the Coordinator of the Ethics and Compliance Committee. They can reach the ethics by phone, or send written notifications to email addresses. During working hours (08:00-17:30), employees can contact the Autoport Ethics Line at the same phone number, via the email address [ethics@autoport.com.tr](mailto:ethics@autoport.com.tr), or through the Limon Application. Outside of working hours, they can reach out via the same email address or through the Limon Application at their convenience.

Suppliers and customers can also submit notifications regarding their ethical and compliance rules to [ethics@autoport.com.tr](mailto:ethics@autoport.com.tr) via email, found on their website [www.autoport.com.tr](http://www.autoport.com.tr).

Anonymous complaint boxes were placed in various locations within the port for workers to submit their grievances.

Six (6) steps complete the Internal Grievance Mechanism. This process is detailed in the steps provided below:

*1<sup>st</sup> Step - Identification of grievance:* The grievance application will be made through the specialist of Autoport to be appointed. This application can be made in person, by phone, by letter, by complaint boxes, or by email.

Mail:	<a href="mailto:autoport@autoport.com.tr">mailto: autoport@autoport.com.tr</a> <a href="mailto:ethics@autoport.com.tr">ethics@autoport.com.tr</a>
Website:	<a href="https://www.autoport.com.tr">https://www.autoport.com.tr</a>
Ethics Phone:	0212 866 55 25 (Internal: 0345525)
Phone :	(0262) 315 38 00
Official Letter:	Autoport Liman İşletmeleri A.Ş Address: Sepetlipınar Mahallesi Arpalık Caddesi No:100 Başiskele – KOCAELİ
Internal	Autoport Ethics Line or the Coordinator of the Ethics and Compliance Committee.

*2<sup>nd</sup> Step - Recording of grievance in 'Grievance Log':* Once the grievance is received and recorded, based on the subject and issue, the appointed specialist of Autoport shall identify the department, management, or personnel responsible for resolving the grievance.

*3<sup>rd</sup> Step - Grievance Tracking:* The specialist of Autoport and related departments should assess the outcomes relating to the grievance. This should be aimed at establishing and analyzing the cause of the grievance and identifying suitable mitigation measures. The analysis of the grievance

will involve assessing various aspects of the grievance, such as the history of the employee, frequency of the grievance occurrence, management practices, recent incidents, etc. During cases when needed, for the sake of the investigation, the appointed specialist of Autoport may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue. A site visit can be required to gain a first-hand understanding of the nature of the grievance and to verify the validity and severity of the grievance.

Following the delivery of the data regarding the grievance to the related managerial department, the grievance can be discussed with the employee and regional and department manager.

The inquiry phase should be completed within 15 business days after receiving the grievance.

*4<sup>th</sup> Step - Resolution and Closure of Grievance:* A resolution is developed due to the consultation made by the appointed specialist of Autoport with the related departments or management. The suitable resolution for the grievance should be communicated to the grievant within 15 business days after the completion of the grievance inquiry phase.

In case the issue is beyond the scope of the appointed specialist of Autoport, the grievance should be escalated to the Project Management to endeavor to resolve the grievances through managerial levels within seven business days of the escalation.

*5<sup>th</sup> Step - Closure of Grievance:* Once the grievance is resolved and communicated to the grievant, the grievance will be closed by the appointed specialist of Autoport by obtaining the necessary signatures. The status of the grievance and understanding of the way the grievance was resolved will be recorded in the Grievance Log. The intention of providing further information on the grievance log is to serve as a reference for any similar grievances that may arise.

*6<sup>th</sup> Step - Right to Appeal:* Applicants can always apply to relevant legal institutions if the complaint cannot be resolved with the existing process. Such institutions can be summarized as follow:

- Civil Courts of First Instance
- Labor Courts, and
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

In case of anonymous grievances, a summary of the grievance and resolution should be posted on Project website, notice boards located at the common areas and announced through weekly meetings.

## 6. MONITORING AND REPORTING

### 6.1 Monitoring and evaluation activities

Monitoring and evaluating the stakeholder engagement process is of utmost importance to ensure timely and effective decision-making for Project implementation.

Engagement activity monitoring can be realized by identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase is presented below. SEP will include a timeline for engagement activities and defining responsible parties for implementing and monitoring engagement activities.

**Table 6-1 Monitoring and Evaluation**

Monitoring Subject	Key Performance Indicators (KPIs)	Internal Monitoring Frequency
Stakeholder engagement	<ul style="list-style-type: none"> <li>• Number of meetings with external stakeholders according to:               <ul style="list-style-type: none"> <li>○ Type of stakeholder group (e.g., central, or local governmental authorities, gender-disaggregated, vulnerable persons, fishermen, NGOs)</li> <li>○ Engagement method (e.g., face-to-face meetings, remote meetings including phone or video calls, correspondence, updates through the Project website, announcements, etc.)</li> <li>○ Meeting locations</li> </ul> </li> <li>• Number of meetings with internal stakeholders</li> </ul>	Monthly monitoring  (Daily records on Stakeholder Engagement Logs to be kept by the Social Focal Point)
External grievance and demand mechanism	<ul style="list-style-type: none"> <li>• Number of external grievances/feedbacks per:               <ul style="list-style-type: none"> <li>○ Settlement</li> <li>○ Subject (e.g., dust, noise, land damage, traffic, fishing impacts, health, safety, GBVH etc.)</li> <li>○ Company (Contractor or Subcontractors)</li> <li>○ A related department within the Company, Contractor, or Subcontractor, or supplier</li> <li>○ Response time limit</li> <li>○ Resolution time limit</li> </ul> </li> <li>• Status of grievance/feedback (open, closed, etc.)</li> </ul>	Monthly monitoring  (Daily records on the External Grievance Register to be kept by the Social Focal Point)
Internal grievance and demand mechanism	<ul style="list-style-type: none"> <li>• Number of internal grievances/feedbacks               <ul style="list-style-type: none"> <li>○ Company</li> <li>○ A related department within the Company, Contractor, or Subcontractor</li> <li>○ Subject (e.g., health and safety, accommodation conditions, work conditions, GBVH etc.)</li> </ul> </li> <li>• Status of grievance/feedback (open, closed, pending, etc.)               <ul style="list-style-type: none"> <li>○ Response time limit</li> <li>○ Resolution time limit</li> </ul> </li> </ul>	Monthly  (Daily records on the External Grievance Register to be kept by the Social Focal Point)

This SEP will be periodically revised and updated annually during Project implementation. Monthly summaries of grievances will be prepared for the grievances raised by internal and

external stakeholders, queries and related incidents, and the implementation status of corrective/preventive actions, consultations, and disclosure activities. Also, SEP monitoring and evaluation reports will be submitted to the EBRD and IFC periodically. The Company will publicly report on its environmental and social performance annually, including a summary of any grievances raised and how they have been resolved. To inform the external stakeholders Annual Environmental and Social Report (an overview of the Annual Environmental and Stakeholder engagement activities will be documented and filed to ensure accountable delivery of commitments made to stakeholders).

## 6.2 Reporting

The Company will keep track of commitments made (commitments tracker) and communicate progress made against these commitments regularly. The Company will prepare an Annual Stakeholder Engagement Progress Report summarizing SEP results, based on which updated information will be delivered and included in the yearly Sustainability Report.

### CONTACT INFORMATION FOR THE PUBLIC

#### Autoport Liman İşletmeleri A.Ş

- **Address:** Sepetlipınar Mahallesi Arpalık Caddesi No:100 Başiskele – KOCAELİ
- **Telephone:** (0262) 315 38 00
- **Fax :** (0262) 315 38 70
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- **Website:** <https://www.autoport.com.tr/>

# Annex A. External Grievance Register and Closure Forms

## GRIEVANCE & DEMAND REGISTER FORM

A - General Information	
Project/Plant Name	
Name of the Recorder	
Form Registry No	
Date of Register	
Place of Register:	<input type="checkbox"/> Site office <input type="checkbox"/> Settlement/Location.....
Type of Register	<input type="checkbox"/> Grievance <input type="checkbox"/> Demand
B- Way of Receiving Grievance/Demand	
<input type="checkbox"/> Telephone <input type="checkbox"/> Petition (Please attach one copy to this form)	<input type="checkbox"/> Face-to-face meetings (site visits) <input type="checkbox"/> Community meetings (Public Information Meetings etc.) <input type="checkbox"/> e-mail <input type="checkbox"/> Other.....
C.1- Information about the Complainant/Demandant	C.2- Stakeholder Category
Name-Surname	<input type="checkbox"/> Local governmental authorities <input type="checkbox"/> Local people (individual) <input type="checkbox"/> Local people (community) [...# of beneficiary] <input type="checkbox"/> Private sector <input type="checkbox"/> Nongovernmental organization <input type="checkbox"/> Main contractors <input type="checkbox"/> Sub-contractors <input type="checkbox"/> Suppliers <input type="checkbox"/> Autoport Representative Projects/Operations Employees <input type="checkbox"/> Workers of (Sub-)Contractors <input type="checkbox"/> Consultant <input type="checkbox"/> Media
Contact Info	
Address	
Village/Settlement	
District/Province	
Signature of Complainant/Demandant Only for the complaints/demands received via meetings, info desk, and visits.	
D.1- Information about Grievance/Demand	D.2- Grievance/Demand Category
<i>Detailed Information about Grievance/Demand (may include settlements of compliant/demandant)</i>	<input type="checkbox"/> Damage to fishing activities <input type="checkbox"/> Damage to access roads <input type="checkbox"/> Environmental Impacts (pollution, dust, noise) <input type="checkbox"/> Use of Lands without Owner's Consent and Legal Permission <input type="checkbox"/> Restricting access to natural resources -lands-beaches, fishing, marine media <input type="checkbox"/> Payment of Usage Fee or Compensation <input type="checkbox"/> Expropriation <input type="checkbox"/> Demand for job or work from local <input type="checkbox"/> Working conditions <input type="checkbox"/> Laying off <input type="checkbox"/> Non-payments of workers' wages

	<ul style="list-style-type: none"> <li><input type="checkbox"/> Debt to local suppliers or sub-contractors</li> <li><input type="checkbox"/> Demanding any support on education</li> <li><input type="checkbox"/> Demanding any support for households/individuals</li> <li><input type="checkbox"/> Demanding any support for settlement/community</li> <li><input type="checkbox"/> Demanding any support for local authorities</li> </ul>
<b>E- Actions Recommended</b>	

**GRIEVANCE & DEMAND CLOSURE FORM**

Grievance/Demand Form Number		
Name of the Recorder		
Date		...../...../.....
<b><i>CLOSURE OF GRIEVANCE/DEMAND</i></b>		
<p>In this section of the Closure Form, Information on how the grievance or demand has been resolved and the amount of money spent to resolve the demand or grievance, if any, will be provided.</p> <p>This part will be terminated through receiving the signature of the compliant/demandant to prove his/her consent and signed by the representative of Autoport Representative after having made the related explanation on the closure process.</p> <p>(If the grievance is received through the internet, email response will be sufficient)</p>		
<b><i>Explanation:</i></b>		
<b><i>Amount of Expenditure:</i></b>		
<b><i>Attachments</i></b>		
<b><i>Complainant/Demandant Name-Surname and Signature</i></b>		<b><i>Autoport Representative Title-Name-Surname and Signature</i></b>

## Annex B. Grievance Register

Date of Grievance	Name of the Complainant	Subject of Grievance	Corrective Action	State of Grievance Closure	Date of Closure	Remarks