



Süper Film Packaging Industry and Trade Inc.  
**Süper Film Biaxially Oriented Polypropylene  
Production Plant Investment Project**

**Grievance Mechanism Procedure  
(Internal and External)**

(Plan No: SPR-PRC-SOC-GMP-001)

December 2022



## Project Information

Project	Details
<b>Name</b>	Süper Film Biaxially Oriented Polypropylene Production Plant Investment Project Grievance Mechanism Procedure (GMP) (Internal and External)
<b>Submitted to</b>	Development and Investment Bank of Turkey Türkiye Kalkınma ve Yatırım Bankası A.Ş. (TKYB)
<b>Issued to</b>	Süper Film Packaging Ind. and Trade Inc. /Süper Film Ambalaj San. ve Tic. A.Ş.
<b>Prepared by</b>	MGS Project Consultancy Engineering Trade Ltd. Co. (MGS) / MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti.

## Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery
Development and Investment Bank of Turkey	Erhan ÇALIŞKAN	Rev00	23.12.2022	e-mail: PDF
Süper Film Packaging Ind. and Trade Inc.	Ahmet Alper ERZİN	Rev00	23.12.2022	e-mail: PDF

## Prepared by

### MGS Project Consultancy Engineering Trade Ltd. Co. (MGS)

<b>Pelin Deniz YOĞURTÇU</b>	Project Manager / International Projects Coordinator
<b>Ekin EKİCİ GÜL</b>	Sociologist
<b>Furkan AKSU</b>	Sociologist
<b>İsmail ÇETİNASLAN</b>	HSE Expert / Environmental Engineer
<b>Kübra ÖZSOY</b>	Project Engineer / Environmental Engineer
<b>Erkan AKSOY</b>	Project Engineer / Environmental Engineer
<b>Yavuz TORUN</b>	Project Engineer / Environmental Engineer
<b>Hilal AYDIN</b>	Project Engineer / Environmental Engineer
<b>Ebruhan HÜNERLİ</b>	Project Engineer / Environmental Engineer



# Table of Contents

- List of Tables .....ii**
- List of Figures.....iii**
- List of Abbreviations.....iv**
- 1 INTRODUCTION.....5**
  - 1.1 Background.....5
    - 1.1.1 Project Location and Area of Influence (Aol) .....6
  - 1.2 Purpose.....7
  - 1.3 Scope.....8
  - 1.4 Definitions .....9
- 2 KEY ROLES AND RESPONSIBILITIES .....10**
  - 2.1 Key Principles .....10
  - 2.2 Roles and Responsibilities .....10
- 3 PROJECT STANDARDS .....12**
  - 3.1 Applicable National Standards.....13
  - 3.2 IFC Performance Standards.....15
  - 3.3 Applicable International Standards, Legislations and Guidelines .....19
    - 3.3.1. IFC Performance Standards .....20
  - 3.4 Project Standards.....21
- 4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT .....21**
  - 4.1 Grievance Mechanism.....21
    - 4.1.1 Principles of the Grievance Mechanism (Internal and External).....22
    - 4.1.2 Grievance Mechanism Communications .....22
  - 4.2 Internal (Worker) Grievance Management Process .....23
  - 4.3 External Grievance Management Process.....24
    - 4.3.1 Receiving Grievances .....25
    - 4.3.2 Assessment and Investigation of Grievances .....25
    - 4.3.3 Feedback to Stakeholders.....26

4.3.4	Proposed Resolution / Corrective Action .....	26
4.3.5	Closure of Grievances.....	26
4.3.6	Non-Resolution Case .....	26
4.4	Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH).....	26
4.5	Other Grievance Redress Mechanisms .....	27
<b>5</b>	<b>MONITORING.....</b>	<b>28</b>
5.1	Review and Revision of This Mechanism .....	28
5.2	Overview of Monitoring Requirements.....	29
5.3	Key Performance Indicators (KPIs).....	29
5.4	Key Monitoring Activities .....	29
<b>6</b>	<b>TRAININGS .....</b>	<b>30</b>
6.1	Induction Training.....	30
6.2	Job Specific and Other Training Requirements .....	31
<b>7</b>	<b>AUDITING AND REPORTING .....</b>	<b>31</b>
7.1	Internal and External Auditing.....	31
7.2	Record Keeping and Reporting .....	31
	<b>APPENDICES.....</b>	<b>33</b>
	Appendix A: Complaint Register Form .....	34
	Appendix B: Grievance Database .....	35
	Appendix C: Consultation Form .....	36
	Appendix D: Grievance Closure Form.....	37
	Appendix E: Suggestion Evaluation System Procedure .....	38

## List of Tables

Table 1-1. Information on Closest Settlements within the Aol .....	7
Table 2-1. Key Roles and Responsibilities.....	10
Table 4-1. Contact Details of the Project .....	25
Table 5-1. Key Performance Indicators (KPIs).....	29
Table 5-2. Key Monitoring Activities.....	29

## List of Figures

Figure 1-1. Project Location Map.....	6
Figure 1-2. Area of Influence (Aol).....	7
Figure 4-1. Processes of Internal and External Grievance Management .....	22

## List of Abbreviations

<b>AoI</b>	Area of Influence
<b>BOIZ</b>	Büyükkarıştıran Organized Industrial Zone
<b>BOPP</b>	Biaxially Oriented Polypropylene Production
<b>DCC</b>	Document Control Center or System
<b>EIA</b>	Environmental Impact Assessment
<b>EHS</b>	Environmental Health and Safety
<b>ERP</b>	Emergency Response Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESP</b>	Environmental and Social Policy
<b>ESS</b>	Environmental and Social Standard
<b>GN</b>	Guidance Note
<b>GMP</b>	Grievance Mechanism Procedure
<b>HR</b>	Human Resources
<b>HS</b>	Health and Safety
<b>HSE</b>	Health, Safety, and Environmental
<b>IFC</b>	International Finance Corporation
<b>km</b>	Kilometer
<b>KPI</b>	Key Performance Indicator
<b>MGS</b>	MGS Project Consultancy Engineering Trade Ltd. Co.
<b>NGO</b>	Non-Governmental Organization
<b>OHS</b>	Occupational Health and Safety
<b>OHSMP</b>	Occupational Health and Safety Management Plan
<b>OIZ</b>	Organized Industrial Zone
<b>Project Company</b>	Süper Film Packaging Ind. and Trade Inc.
<b>PAP</b>	Project Affected People
<b>PRC</b>	Procedure
<b>PS</b>	Performance Standard
<b>SAS</b>	Social Affairs Staff
<b>SEP</b>	Stakeholder Engagement Plan
<b>The Project</b>	Süper Film Biaxially Oriented Polypropylene Production Plant Investment Project
<b>TKYB</b>	Development and Investment Bank of Turkey

# 1 INTRODUCTION

This Grievance Mechanism Procedure (“GMP”) is prepared for “Süper Film Biaxially Oriented Polypropylene Production (‘’) Plant Investment Project” (“Project”) for the internal and external stakeholders of the company located in Lüleburgaz District of Kırklareli Province to be implemented in parallel to Stakeholder Engagement Plan (“SEP”) prepared for the Project.

This GMP will be conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project as per the national legislation, International Finance Corporation (“IFC”) Performance Standards (“PSs”) and Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy (“ESP”). The reference number of this Plan is SPR-PRC-SOC-GMP-001.

This GMP reflects the general issues which should be taken into consideration during the operations of the Project, and this is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

## 1.1 Background

Super Film *Packaging Industry and Trade Inc.* has been continuing its production activities since 1993 on an area of 63.000 m<sup>2</sup> in Gaziantep Başpınar Organized Industrial Zone. There are 70,000 tons/year BOPP production lines, 48,000 tons/year BOPET, 6,000 tons/year multi-layer barrier film and CPP and 39,000 tons/year metallized production lines. In addition, having an adhesive tape production facility with a capacity of 240,000,000 m<sup>2</sup>/year, Süper Film is one of the world's leading packaging film manufacturers, producing a wide variety of packaging films under one roof. In addition to Turkey's first and only extrusion (thermal) coating line, it invested in special coated products with a new coating line with a capacity of 12,000 tons/year in 2015. With its new Metallized line, which came into operation in April 2022, it increased its annual metallized film production to 39,000 tons. With the 60,000 tons/year capacity Lüleburgaz facility planned to be opened by the end of 2023, it aims to increase the annual BOPP film production to 130,000 tons and the total flexible film production to 184,000 tons/year.

Super Film Packaging; is a Sanko Holding company. The partnership structure of the company consists of Sanko Holding and Sanko *Textile* partnership. In addition, it has two subsidiaries, Süper Film Europe and Süper Film America, for sales and marketing activities.

The facility to be established in the Lüleburgaz district of Kırklareli is the BOPP line with a capacity of 60,000 tons/year, as mentioned above. The reasons such as the expectation of a 4% increase in the global demand for BOPP flexible films in the next 5 years, the increase in Super Film sales volumes, and the contribution to the technological transformation were

effective in the investment decision. Since the export volume of the company is expected to increase, the Thrace region was preferred as the investment region. The construction works for the Lüleburgaz facility started in July 2022 and it is planned to complete the construction phase in July 2023 and the facility to start operating in December 2023.

### 1.1.1 Project Location and Area of Influence (Aoi)

The location of the Project Area is in Büyükkarıştıran Organized Industrial Zone (“BOIZ”) within administrative borders of Lüleburgaz District of Kırklareli Province. There are industrial facilities in the region that carry out similar activities with the planned Project. The Project area is considered as an area of influence (“Aoi”) with a radius of 1 km since similar studies will be carried out with the existing activities within the scope of the Project. Area of Influence; Access roads will be evaluated taking into account environmental and social impacts, including existing buildings and infrastructures. Figures 1-1 and 1-2 below show the location and impact areas of the Project.

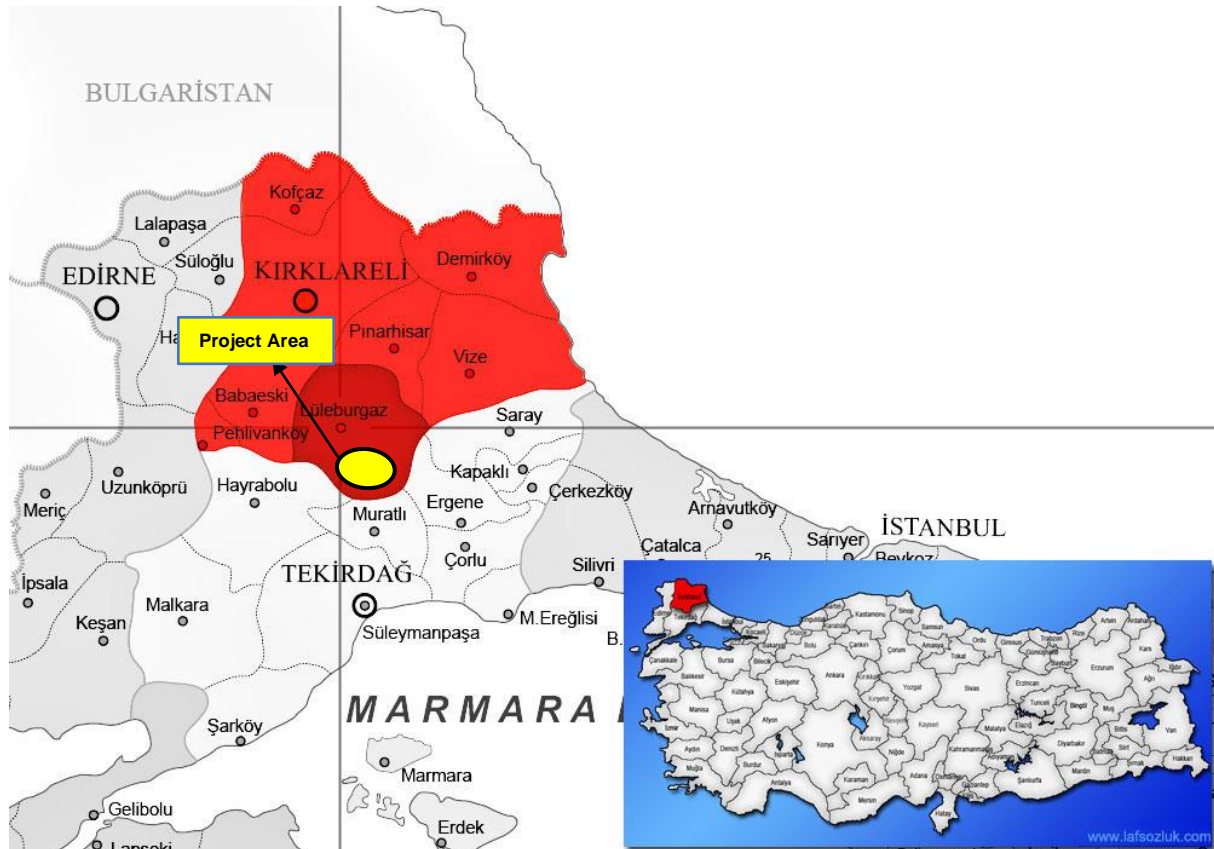


Figure 1-1. Project Location Map



Table 1-1. Information on Closest Settlements within the Aol

Settlement District and Province	Distance to the Project Area (km)	Direction	Population		
			Total	Male	Female
Yıldırım Neighborhood Lüleburgaz / Kırklareli	~1	Northwest	2309	1173	1136
Yeni Neighborhood Lüleburgaz / Kırklareli	~2	Northwest	921	483	438

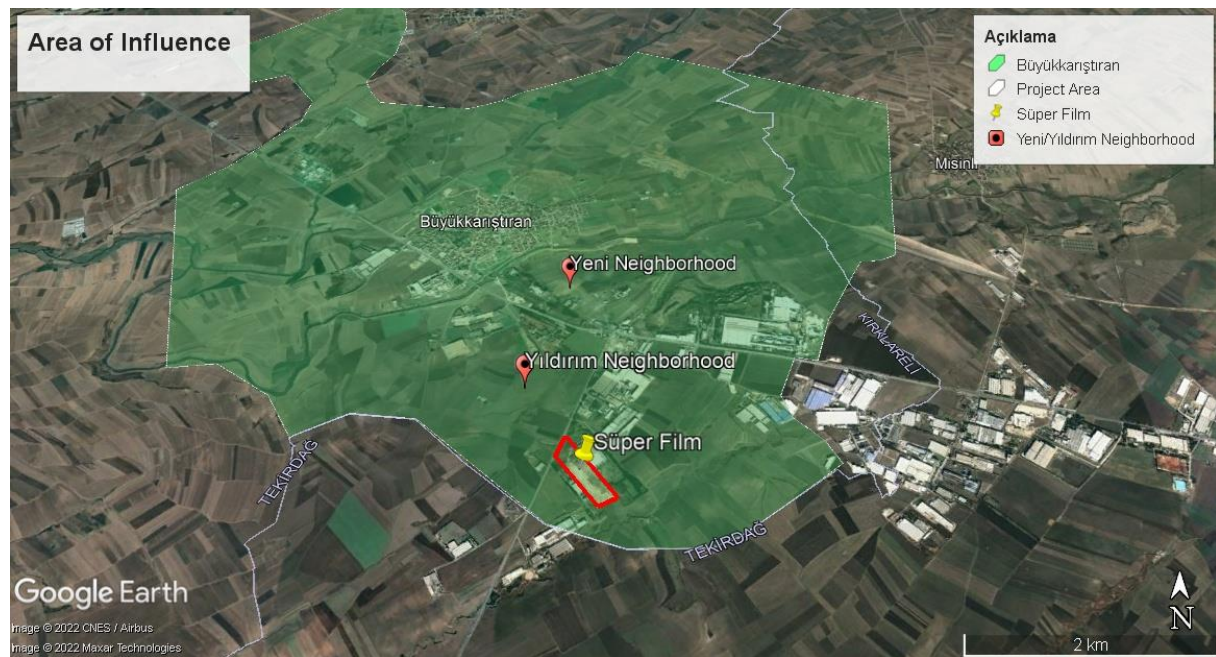


Figure 1-2. Area of Influence (Aol)

## 1.2 Purpose

The purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into business to eliminate or minimize social risks. The grievance mechanism aims to ensure that all comments, suggestions and complaints concerning the Project will be considered transparently and the related measures will be taken. The processes and responsibilities of this mechanism will be defined for both external stakeholders and internal direct and indirect employees.

This mechanism is under the responsibility of the Social Affairs Staff (“SAS”) of the Project.

This document aims to identify:

- the scope of grievance mechanism mechanism and the applicable management interfaces,
- the definition of roles and responsibilities,

- the applicable project standards, project commitments, operational procedures, and guidance relevant to this Mechanism,
- monitoring and reporting procedures, including Key Performance Indicators (“KPI”s),
- training requirements and references for supporting materials and information,
- the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- how to minimize community conflict by systematically addressing grievances.

This mechanism is not limited but can be updated. The mechanism will be reviewed on a minimum annually basis during operation phase. During steady-state operations, this mechanism will be reviewed on an annual basis to determine if there are any changes or updates required to the mechanism unless a more frequent update is required to reflect changing project design or procedures. Any requests for changes to this mechanism must be addressed to the executive of this mechanism (SAS) and will be subject to appropriate review and approval processes.

### 1.3 Scope

This document outlines the grievance redress mechanism which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints, suggestions and comments that may arise as a direct or indirect result of the environmental and social performance of the Project. The Grievance Mechanism Procedure is not a replacement for stakeholder engagement activities.

This mechanism covers all the grievances raised by internal and external stakeholders, including the activities of contractors.

This Mechanism is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- Stakeholder Engagement Plan (SPR-PLN-SOC-SEP-001),
- Emergency Response Plan (SPR-PLN-HSE-ERP-002),
- Occupational Health and Safety Management Plan (SPR-PLN-HSE-OHSMP-003),
- Community Health and Safety Management Plan (SPR-PLN-HSSE-CHSMP-002),
- Air Quality Management Plan (SPR-PLN-ENV-AQMP-001),
- Waste Management Plan (SPR-PLN-HSE-WMP-001).

## 1.4 Definitions

<b>Accessibility</b>	All employees and stakeholders can raise a comment or submit a grievance easily.
<b>Compliant</b>	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
<b>Confidentiality</b>	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
<b>Culturally Appropriate</b>	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
<b>External Stakeholder</b>	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
<b>Grievance Mechanism</b>	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
<b>Grievance:</b>	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
<b>Impartiality</b>	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
<b>Informed Consultation and Participation</b>	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
<b>Internal Stakeholders</b>	Groups or individuals within a business who work directly within the business, such as employees and contractors
<b>Project Affected People (PAP)</b>	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<b>Stakeholder</b>	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
<b>Transparency</b>	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
<b>Vulnerable People</b>	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## 2 KEY ROLES AND RESPONSIBILITIES

### 2.1 Key Principles

The Internal (Worker) and External Grievance Mechanisms will be implemented by relying on the following key principles for all the Project-related internal and external comments, issues, and complaints.

- **Transparency:** All the grievances are considered in the scope of the grievance mechanism clearly and understandably.
- **Impartiality:** A fair and equal grievance mechanism will be applied for every complaint or concern submitted by individuals or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities is considered in the manner of regional concerns and a convenient resolution process will be taken.

### 2.2 Roles and Responsibilities

Key roles and responsibilities relevant for the implementation of this mechanism are outlined in Table 2-1.

*Table 2-1. Key Roles and Responsibilities*

Roles	Responsibilities
<b>Top Management</b>	<ul style="list-style-type: none"> <li>• Approving the social budget of the Project determined and submitted by SAS,</li> <li>• Ensuring this mechanism is implemented properly during the lifetime of the Project,</li> <li>• Determines the policies and targets regarding the social communication, grievance mechanism and stakeholder engagement,</li> </ul>
<b>Factory Manager</b>	<ul style="list-style-type: none"> <li>• Having overall responsibility for the implementation of this GMP by fulfilling the Project requirements together with SAS,</li> <li>• Providing necessary resources for the proper implementation of the mechanism,</li> <li>• Coordinates with parties for proper implementation of this GMP and SEP,</li> <li>• Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked,</li> <li>• Supporting SAS on the evaluation of the relevance of grievances collected and gives final decision on HSE and social grievances.</li> </ul>

Roles	Responsibilities
<p><b>Social Affairs Staff (SAS) / Human Resources (“HR”) and Administrative Affairs Specialist</b></p>	<ul style="list-style-type: none"> <li>• Approving the Mechanism and determining the resources required for the implementation,</li> <li>• Making the final decision concerning internal and external grievances (if needed) in terms social issues in the light of the assessments,</li> <li>• Having overall responsibility for the implementation of this GMP by fulfilling the Project requirements together with SAS,</li> <li>• Determining the social budget of the Project and reporting it to the Top Management.</li> <li>• Implementing SEP and GMP,</li> <li>• Ensuring the Project’s compliance with the national and international standards and requirements set out in this Plan,</li> <li>• Coordinating the relevant parties for the proper implementation of this Mechanism,</li> <li>• Reporting to the Factory Manager about the system performance,</li> <li>• Ensuring national and international legislation/guidelines which are applicable to the Project activities are identified and tracked,</li> <li>• Recording all formal and informal engagement activities with local communities in Document Control Center (“DCC”),</li> <li>• Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports,</li> <li>• Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement reports,</li> <li>• Forming relationships with the Project stakeholders,</li> <li>• Organizing stakeholder meetings to collect the grievances, concerns and/or requests actively as required,</li> <li>• Providing regular reporting back to the community on the management related to community grievances,</li> <li>• Determining and providing the necessary training materials for all employees,</li> <li>• Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.),</li> <li>• Searching the causes of the grievances and the social incidents that cause, injuries, delays or stoppage in the work and disputes among the Project and communities,</li> <li>• Monitoring all complaints and ensuring that all complaints are resolved and closed properly in a timely manner,</li> <li>• Following the results of complaint and reporting on a weekly, monthly and annual basis,</li> <li>• Recording and reporting general and local employment rates and complaints which are received verbally or observed visually,</li> <li>• Filling out the “Complaint Register Form”, keeping the grievance records in “Grievance Database” and monitoring the grievances through the database, and filling out “Consultation Form”, when necessary, and proceeding grievance closure through “Grievance Closure Form” in accordance with this GMP,</li> <li>• Giving the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 working days that the grievance solution process has started and after the grievance closed).</li> </ul>

Roles	Responsibilities
<b>Quality Assurance Engineer</b>	<ul style="list-style-type: none"> <li>• Having overall responsibility for the implementation of this GMP by fulfilling the Project requirements together with SAS,</li> <li>• Determining necessary resources for proper implementation of this GMP and reporting them to the Top Management and Factory Manager.</li> </ul>
<b>Environment Representative</b>	<ul style="list-style-type: none"> <li>• Making the final decision concerning internal and external grievances (if needed) in terms of OHS and environmental issues in the light of the assessments of the Social Affairs Staff (SAS), OHS Specialist and Quality Assurance Engineer.</li> <li>• Working in cooperation with the OHS Specialist and SAS in terms of environmental issues,</li> <li>• Determining the environmental impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances,</li> <li>• Ensuring that all provisions in the Contractor engagements regarding environmental requirements as per the Project Standards during the operation phase and auditing the performance of the Contractors on those requirements,</li> <li>• Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding environmental issues.</li> </ul>
<b>Occupational Health and Safety Specialist</b>	<ul style="list-style-type: none"> <li>• Working in cooperation with the Environment Representative and SAS in terms of HS issues,</li> <li>• Determining the OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances,</li> <li>• Ensuring that all provisions in the Contractor engagements regarding HS requirements as per the Project Standards during the operation phase and auditing the performance of the Contractors on those requirements,</li> <li>• Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding health and safety issues.</li> </ul>
<b>Contractors / Subcontractors / Suppliers &amp; Employees</b>	<ul style="list-style-type: none"> <li>• Ensuring that all requirements in this GMP are complied with.</li> <li>• Not making any commitment in their interactions with the stakeholders beyond their competence,</li> <li>• Complying with the requirements of this GMP and other relevant Management System documentation of the Project.</li> </ul>

### 3 PROJECT STANDARDS

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

- applicable Turkish Standards,
- Turkish EIA requirements,
- TKYB Environmental and Social Policy,
- other commitments to and requirements of Turkish Government authorities,

➤ applicable international standards and guidelines.

### 3.1 Applicable National Standards

#### *The Constitution of The Republic of Turkey*

The main document of the national requirements and standards is “The Constitution of The Republic of Turkey” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

##### I. Legal Egalitarianism

**ARTICLE 10.** Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

##### II. Prohibition of Forced Labor

**ARTICLE 18.** Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

##### III. Freedom of Thought and Opinion

**ARTICLE 25.** Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

##### IV. Freedom of Expression and Dissemination of Thought

**ARTICLE 26.** Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

##### V. Right of Petition

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

#### *Law on The Right to Information*

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

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

**ARTICLE 3.** Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

### ***Labor Law***

#### ***The Principle of Equal Treatment***

**ARTICLE 5.** Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

#### ***The Worker's Right of the Immediate Termination for the Valid Reason***

**ARTICLE 24.** Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

#### ***Overtime Work***

**ARTICLE 41.** Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

**ARTICLE 42.** Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

#### ***Working Age and Prohibition of Child Employment***



**ARTICLE 71.** The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development.

### ***Unions and Collective Agreements Law***

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

### ***Environmental Law***

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 29 July 2022, no 31907) is defined which includes a limited public disclosure process. The purpose of the environment law is to protect and improve the environment which is the common asset of all citizens; make better use of, and preserve land and natural resources in rural and urban areas; prevent water, land and air pollution; by preserving the country's vegetative and livestock assets and natural and historical richness, organize all arrangements and precautions for improving and securing health, civilization and life conditions of present and future generations in conformity with economic and social development objectives, and based on certain legal and technical principles.

When it comes to the public consultation requirements, it is mandatory to hold at least one public participation meeting for the Projects which is under the Annex-I of the EIA Regulation, while no requirement is needed for the projects under the Annex-II of the same regulation.

Similarly, according to the EIA Regulation, which entered into force with the Official Gazette dated 29.07.2022 and numbered 31907, a 'Stakeholder Engagement Plan' should be added to the EIA Application File. Whereas, SEP is not required to be added to the 'Project Introduction Files', which are prepared for the projects under the Annex-II list of the EIA Regulation.

## **3.2 IFC Performance Standards**

The international standards and guidelines which the Project will follow are set by International Finance Corporation ("IFC"). IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (GN1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions*

Key objectives of *PS1* related to external grievance management are:

- To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,
- To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks, and impacts to workers, Affected Communities, and the environment.
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

- To develop a grievance mechanism to receive and facilitate the resolution of Affected Communities' concerns and grievances related to environmental and social performance of the Project,
- To identify the risks and impacts of the Affected Communities and other stakeholders,
- To maintain an understandable, culturally appropriate, accessible and transparent consultation to stakeholders through early and ongoing engagement,
- To inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
- To follow the developed grievance mechanism to receive and respond to stakeholder concerns related to the Project promptly.
- To establish a monitoring and review procedures of the concerns and grievances raised by Affected Communities and stakeholders.

Key objectives of PS2 related to worker grievance management are:

- To create equal, fair, and nondiscriminatory working opportunities for every worker,
- To develop, maintain, and improve the worker-management relationship,
- To promote compliance with national employment and obey the labor laws,
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain by developing a reliable grievance mechanism,
- To identify, evaluate and respond to workers concerns and grievances in a timely manner,
- To promote safe and healthy working conditions to direct and indirect workers,
- To avoid the use of forced and child labor.

Key requirements implemented by the Project according to PS2 are as following:

Human Resources Policy, Terms of Employment and Working Conditions & Relationship

- The Project will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits.
- The Project will make all policies understandable to all workers.
- The Project will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

- The Project will comply with the national labor law which contains rights of workers to form and to join workers' organizations.
- If national law restricts the right to organize and workers' organizations, the Project will enable the means for workers to bargain collectively and to organize and establish an alternative way for workers to file grievances.
- The Project will not discriminate against workers who choose to organize and create equal conditions for all the workers.
- Worker representatives should be given access to management.

Non-Discrimination and Equal Opportunity

- The Project will hire, promote, and compensate workers solely based on their ability to do the job and all workers are provided equal access to training, tools and opportunities for advancement.

- The Project will ensure that all workers will be free from harassment by management or other workers.

#### Retrenchment

- The Project will establish and implement a procedure to mitigate the adverse impact of retrenchment and carry out an analysis of alternatives to retrenchment.
- The procedure will incorporate non-discrimination principles and include the input of workers, their organizations, where appropriate, the government.

#### Child Labor

- The Project will not employ workers under the minimum age for employment as defined by national law.
- Workers between the minimum age and 18 will not be employed in dangerous work or work that interferes with their education or development.

#### Forced Labor

- The Project will not employ forced labor which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty and
- The Project will respect and protect rights of workers to retain their personal documents and money.
- The Project will respect the rights of workers to leave the workplace after work.

#### Grievance Mechanism

- The Project will provide a grievance mechanism for workers and develop it as a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- The Project will ensure that there will be no discrimination against those that express grievances, and all the grievances are considered seriously and take prompt, appropriate action.
- Any grievance mechanism will not replace other channels as defined by law or collective bargaining agreements.

#### Occupational Health and Safety

- Workers are not unreasonably endangered at work or in dormitories and all the necessary precautions to mitigate work-related risks and develop an emergency prevention and response system.

- Workers will be provided personal protective equipment and will be trained in its use.
- The Project will document and report accidents, diseases, and incidents during the Project.

#### Workers Engaged by Third Parties

- The Project will extend the labor standards performance policies and procedures to contractors hired directly or through employment agencies.
- The Project will not use contracting as a means of circumventing labor rights and laws and will ensure all the workers have access to a grievance mechanism.
- The Project will monitor contractors, employment and recruitment agencies to verify their adherence to labor rights and laws.

#### Supply Chain

- The Project will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- The Project will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.

The Project will monitor the performance of suppliers according to PS2.

### **3.3 Applicable International Standards, Legislations and Guidelines**

International standards to be observed by the Project is the IFC Performance Standards. Particularly, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement. Basic objectives of international standards and guidelines are as follows:

- To define project affected people and communities and other relevant parties influencing, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them,
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it,
- To review this database in consultation with relevant parties,
- To provide necessary information and consultancy services to all stakeholders by facilitating their required contributions on the environmental and social issues that may affect them,
- To continuously protect respectful and constructive relations with stakeholders based on mutual confidence and honesty, and by respecting the values of the stakeholders.

### 3.3.1. IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

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

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

- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders.

### 3.4 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

## 4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

### 4.1 Grievance Mechanism

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

Grievance Mechanism Procedure (SPR-PRC-SOC-GMP-001) of the Project provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible and transparent manner.

Grievance procedures will be coordinated through the appointed Social Affairs Staff (SAS) with the help of OHS Specialist and Environment Representative who are the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. The SAS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

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

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

The internal and/or external grievance mechanism process to be followed to resolve the grievances is described in below *Figure 4-1*.

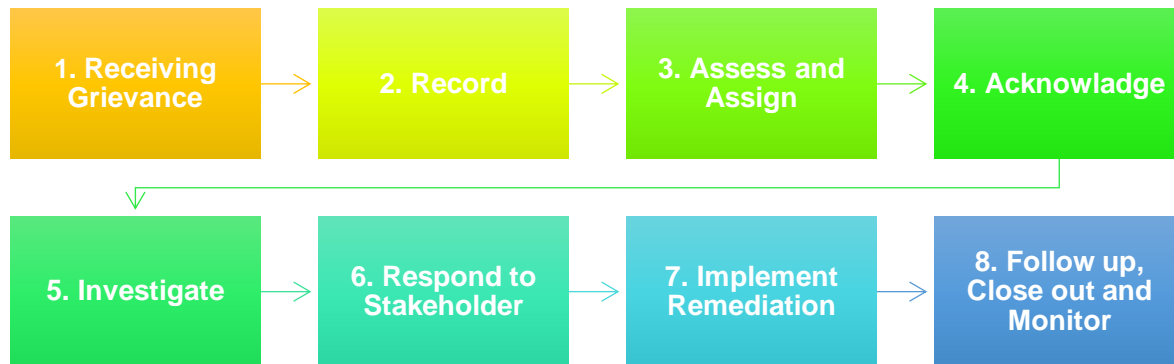


Figure 4-1. Processes of Internal and External Grievance Management

#### 4.1.1 Principles of the Grievance Mechanism (Internal and External)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- **Keeping it up to date:** The process will be regularly reviewed jointly by the SAS, OHS Specialist and Environment Representative. Regular monitoring and evaluation should be conducted continuously.
- **Confidential and impartial process, non-retribution:** The process will be confidential and impartial, without employees fearing retribution.
- **Reasonable timescale:** A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 calendar days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

#### 4.1.2 Grievance Mechanism Communications

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers (Top Management members, Factory Manager, Environment Representative, SAS, etc.) should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places and in DCC.

For the collection of *internal* grievances from employees:



- Grievance mechanism process are communicated with all employees (including contractor's employees) during the recruitment process and the first induction training sessions also include the stakeholder engagement and grievance mechanism process;
- Communication about the grievance mechanism is repeated regularly with the toolbox trainings;
- The grievance/suggestion tools are available at the social places (social resting rooms, changing rooms, etc.) in the Project area for internal grievances which are in use by the workers. The tools are connected to internal network, which makes the grievances able to be delivered to relevant departments at any time; and
- All employees are aware of the location of those tools and how to submit their grievances; the employees should be informed in case of any change regarding the location of those tools.

For the collection of external grievances from community:

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

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of the Project). These two mechanisms will be run by the Project SAS, Environment Representative and OHS Specialist. During the resolution of the internal or external grievances, different departments can be collaborated such as Quality Insurance, Environment Representative and SAS, etc.

#### **4.2 Internal (Worker) Grievance Management Process**

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments and concerns. Since the confidentiality of the complainant should be preserved, grievances are collected in grievance tools which are placed in social places that workers can easily access, including social resting rooms and changing rooms. The workers use those tools by using their Project ID cards.

Information on how to express complaints, opinions and suggestions to workers will be provided during the induction training and refreshment trainings. Grievance submissions will not be used in any way to intimidate those submitting the complaints.

Management will treat the grievances seriously and take prompt, appropriate actions. “Social Affairs Staff” will have the main responsibility to collect the complaints. The complaints will be discussed with management in order to gather accurate information about a given complaint. Social Affairs Staff will process the complaint/concern and provide a resolution. Resolutions of complaints will be developed in accordance with relevant Turkish laws, regulations, as well as international requirements. Feedback will be provided to those involved.

It is possible to extend the process for the complex grievances, and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during solution process. Social Affairs Staff aims to respond in cooperation with the related department and solve each complaint within 30 calendar days. The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this mechanism should be fulfilled.

Moreover, there are 2 employee representatives will convey the problems and expectations of the employees to the senior management. Employees can also convey their suggestions and requests on issues such as their jobs, working conditions, wages, etc. to the relevant top management through employee representatives. Additionally, general meetings are held every year between Süper Film management representatives and employee representatives.

There were no Grievance Boxes in the project area. Grievance Boxes should be placed in the project area and internal complaints will be collected through these boxes. SAS is responsible for opening the Grievance Boxes weekly and evaluating the suggestions

Super Film has a “Suggestion Evaluation System Procedure” in order to ensure the participation of its employees in management decisions and to improve its services. This procedure covers all employees of the company. Details of this procedure are given in the Annex E.

### **4.3 External Grievance Management Process**

Besides internal grievance mechanism procedure, external grievance management process will be implemented for grievances raised by all stakeholders such as local communities, governmental or non-governmental organizations, universities, media etc.

The steps of the grievance management process consist of (i) receiving the grievance, (ii) assessing, (iii) sending acknowledgement, (iv) investigating, (v) feedback to stakeholder, (vi) implementing the remediation activities and (vii) closure.

#### 4.3.1 Receiving Grievances

Grievances are received through all available channels such as phone, e-mail, grievance forms, website, contractors and etc. The stakeholder can raise a grievance by filling out the grievance form. Once the form is completed then “Social Affairs Staff” will process the form according to the grievance redress mechanism.

Since there is no building belonging to Süper Film in the project area and it is under construction, there is no address information and information of the responsible persons. The contact information of the factory manager is given below.

Table 4-1. Contact Details of the Project

Süper Film Packaging Ind. and Trade Inc.	Contact Person on the Project Site
<b>Website:</b> <a href="https://www.superfilm.com/">https://www.superfilm.com/</a> <b>Project Site Address:</b> To be determined <b>Phone:</b> To be determined	<b>Contact Persons</b> Social Affairs Staff <b>E-Mail:</b> To be determined <b>Phone:</b> To be determined  Environment Representative <b>E-mail:</b> To be determined <b>Phone:</b> To be determined  Memik Demir Factory Manager <b>E-mail:</b> memik.demir@superfilm.com <b>Phone:</b> +90 532 208 21 79

The Complaint Register Form (see *Appendix A*) will be used to collect the information about grievances, concerns and the complainant. All grievances will be recorded and collected in the Grievance Database (see *Appendix B*).

The existing contact details of the Project is given above. The contact information regarding the assigned SAS (name and contact number/e-mail address) will be included when this Mechanism is updated.

#### 4.3.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into “Grievance Database” (see *Appendix B*). The Social Affairs Staff (SAS) investigates the grievance and makes the first evaluation with the help of Environment

Representative and OHS Specialist, when necessary. The Project investigates the grievance and involves appropriate departments in its investigation and formulation of a resolution.

The complainant may be contacted (if not anonymous) to gather more information, using the “Consultation Form” (see *Appendix C*). Any correspondence with the complainant will be recorded in the “Grievance Database”. When final decision is made on the grievance, feedback will be given to stakeholder.

#### **4.3.3 Feedback to Stakeholders**

Feedback duration on the status of the delivered grievance, is assigned as 30 calendar days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 working days of grievance receipt. Complaints received anonymously will be investigated in the same manner as non-anonymous complaints, but no formal response will be issued.

#### **4.3.4 Proposed Resolution / Corrective Action**

Within 30 calendar days of receipt of the grievance, SAS of the Project will formally communicate a proposed resolution or corrective action to the complainant (if not anonymous) and discuss it with the complainant. The complainant will be informed about the methodology followed. All communication will be recorded in the “Grievance Database”.

#### **4.3.5 Closure of Grievances**

The grievance mechanism of the Project aims to formally close out every grievance within 30 calendar days after receiving it, unless an alternative agreement is made with the complainant. Note that this alternative agreement must be reached within these 30 calendar days. Closure requires the signature of the complainant (if not anonymous) on the Grievance Closure Form (see *Appendix D*), which details the agreed resolution. The signed “Grievance Closure Form” will be recorded in the “Grievance Database”.

#### **4.3.6 Non-Resolution Case**

If a grievance cannot be resolved although efforts will be made to solve the concern within the set timeframe, the Project will involve other external experts, neutral parties or local and regional authorities, as necessary and appropriate.

Moreover, an explanation to the complainant (if not anonymous) about why the grievance cannot be resolved will be given.

### **4.4 Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)**

Sexual Exploitation and Abuse / Sexual Harassment (“SEA/SH”) is a risk for any project that interfaces with a community. However, risks increase in settings where incidents of sexual

exploitation, abuse and sexual harassment (SEA/SH), are normalized and/or committed with impunity, and where survivors are unlikely to seek assistance due to social stigma, retaliation, or other security issues. When the rule of law and basic protective infrastructure is lacking, further contributing to risks of SEA/SH. In order to minimize those risks, following mitigation measures will be taken within the scope of the Project:

- Sensitization of the managements of the Project on SEA/SH issues will be provided.
- Trainings regarding SEA/SH will be provided to all Project workers.
- All Project workers will sign and be informed about the Code of Conduct.
- All details of the SEA/SH survivors will be kept strictly confidential in the Grievance Register Database.
- Those kinds of SEA/SH claims/issues will be evaluated/addressed and responded directly by the Ethical Committee formed by General Manager, Human Resources Manager, Legal Counsel, Senior Manager and Corporate Communications Manager
- When the claim is proved, necessary legal sanctions will be applied, or their enforcement will be ensured.
- If necessary, female personnel (other than SAS) will be assigned for the registration of SEA/SH grievances, and a separate training will be conducted only for the female workers in order to inform and raise awareness on the SEA/SH response mechanism.

#### 4.5 Other Grievance Redress Mechanisms

In addition to Süper Film's grievance mechanism, the residents and/or Project stakeholders can apply to TKYB's existing grievance mechanism and national-level grievance mechanisms such as CİMER and YİMER.

**TKYB's Environmental Complaint Mechanism:** Any parties directly and/or significantly affected by environmental impacts arising from the TKYB's operational or financial activities can submit a complaint to the TKYB. Complaints are systematically archived and promptly handled. The online form available on the contact webpage of TKYB (can be filled. Also, the phone number and physical address of the general directorate of TKYB is given as:

- [www.kalkinma.com.tr](http://www.kalkinma.com.tr)
- Online complaint/suggestion form: <https://kalkinma.com.tr/en/contact-us/contact-information>
- Phone number: +90 216 636 87 00
- Fax number: +90 216 636 89 28
- E-mail address: [haberlesme@kalkinma.com.tr](mailto:haberlesme@kalkinma.com.tr)
- Physical address: Saray mahallesi. Dr. Adnan Büyükdeniz caddesi. No:10 34768 Ümraniye/İstanbul/Türkiye

**Presidency's Communication Center:** The Presidency's Communication Centre (CİMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

- [www.cimer.gov.tr](http://www.cimer.gov.tr)
- Call Centre: 150
- Phone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates.

**Foreigners Communication Center:** The Foreigners Communication Center (YİMER) has been providing a centralized complaint system for foreigners. YİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

- [www.yimer.gov.tr](http://www.yimer.gov.tr)
- Call Centre: 157
- Phone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the Republic of Turkey General Directorate of Migration Management.

## 5 MONITORING

### 5.1 Review and Revision of This Mechanism

This mechanism will be reviewed on minimum annually basis during operation phase. During steady-state operations, this mechanism will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs. The revision of this mechanism will be the responsibility of the "Social Affairs Staff", who are the custodian of the mechanism.

If material changes to operating procedures are required, the mechanism may be updated on an "as required" basis. If there is any revision on this mechanism, it will be uploaded to the Document Control Center of the Project to ensure that all staff has access to the latest version of this mechanism.

## 5.2 Overview of Monitoring Requirements

In compliance with the Project Standards which is described in Section 3 of this mechanism, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

## 5.3 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the grievance management performance.

Table 5-1. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database
Auditing Grievance Mechanism to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report

## 5.4 Key Monitoring Activities

The key monitoring activities are used to assess grievance management. The Project will also monitor the efficiency and application of the third-party grievance mechanism. The procedures and the grievance management tool will be adjusted as required. Key monitoring measures are set out in Table 5-2 below.

Table 5-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	The Project will review Grievance Log / Database,	Grievance Database	Monthly	Project office

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
	including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include: <ul style="list-style-type: none"> <li>• number of outstanding complaints and grievances opened in the month,</li> <li>• number of complaints and grievances opened in the month and evolution since Project start (graphic presentation),</li> <li>• number of complaints grievances closed in the month; and</li> <li>• type of grievance.</li> </ul>			
Customer Satisfaction	SAS and Customer Services Team Leader will keep records written and verbal complaints raised by customers.	Customer Grievance Records and Satisfaction Surveys	Monthly	Project office
Community Engagement Activities	The SAS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Project office
Disclosure Materials and Feedback to Communities	SAS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SAS will monitor feedback to local communities	Community Info System on the Website	Quarterly	Project office

## 6 TRAININGS

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

### 6.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e., workers of contractors and/or subcontractors). The trainings will be given in the first “Induction Training” session. All employees of the Project and



contractors are required to participate in social trainings. This training will provide the information on how to understand and respect different opinions and to be an effective team member by behaving appropriately with locals and colleagues; how to raise a grievance/suggestion or comments.

Moreover, Code of Conduct and SEA/SH training as well as the relevant issues will be provided to all employees and the other external stakeholders.

## 6.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Grievance Management is also provided to the Social Affairs Staff and other personnel defined in Section 2 of this document.

# 7 AUDITING AND REPORTING

## 7.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Affairs Staff during the operational phase to ensure the assessment of the social responsibility program and overall grievance management. The conformance will be monitored in accordance with the requirements set out in this Mechanism. The aspects of this GMP are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this GMP.

The conformance with this document will be subject to periodic assessment as part of the Süper Film audit program and separately by Project Lenders.

## 7.2 Record Keeping and Reporting

Record keeping will be done by SAS during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations and incidents which will be managed according to the Project procedures.

On monthly basis, an overview of the grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out and engagement activities as completed/ongoing will be recorded periodically. The SAS will



evaluate and conclude this overview with project management in the monthly management progress meetings.

# APPENDICES

**Appendix A: Complaint Register Form**

**Appendix B: Grievance Database**

**Appendix C: Consultation Form**

**Appendix D: Grievance Closure Form**

**Appendix E: Suggestion Evaluation System Procedure**

### Appendix A: Complaint Register Form

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

### Appendix B: Grievance Database

Grievance Database Reporting Period									
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 5 days that the grievance solution process has started.									
** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.									

**Appendix C: Consultation Form**

Consultation Form									
<b>Reference No:</b>									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			<b>Communication Type</b>						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

### Appendix D: Grievance Closure Form

Grievance Closure Form	
<b>Reference No:</b>	
<b>Determination of Corrective Action(s)</b>	
1	
2	
3	
4	
5	
<b>Responsible Departments</b>	
<b>Close Out the Grievance</b>	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
<b>Date:</b>	<b>Name Surname / Signature of the Person Closing the Complaint</b>
...../...../.....	<b>Name, Surname / Signature of Complainant</b>

## Appendix E: Suggestion Evaluation System Procedure

	<b>ÖNERİ DEĞERLENDİRME SİSTEMİ PROSEDÜRÜ</b>	Doküman No : SF.IK.PR-010 R.Tarihi : 29.03.2022 Rev. No : 0 Sayfa No : 1 / 3
---	--	---

### 1. AMAÇ

İşyerimizde "İşi en iyi, yapan bilir" felsefesinden yola çıkarak;

- o Yeni hizmetler geliştirmek,
- o İşyeri içindeki süreçlerimizi ve uygulamalarımızı geliştirmek,
- o Çalışanlarımızın görüş ve önerileri doğrultusunda, işleyişimizdeki hata ve eksiklerimizi gidermek,
- o Bunları yaparken çalışanlarımızın da yönetim kararlarına katılımını sağlamak,

### 2. KAPSAM

Firmamızın tüm çalışanlarını kapsar.

### 3. TANIMLAR

### 4. İLGİLİ BELGELER

### 5. UYGULAMA

Müdür ve üstü konumundaki kişiler, kendi bölümleri hariç olmak üzere, tüm çalışanlarımız öneri verebilir.

5.1. İşyerimizde öneri kapsamı dahilinde çalışanlar, bireysel veya bölüm olarak aşağıdaki başlıkları kapsayan konularda yönetime öneride bulunabilir.

- Verimlilik artırmaya,
- Maliyet azaltmaya,
- Stok azaltmaya,
- Kaliteyi iyileştirmeye,
- Süreçleri iyileştirmeye,
- İş kazalarını önlemeye,
- Meslek hastalıklarını önlemeye,
- Enerji/doğal kaynak verimli kullanımı sağlamaya,
- Çalışan ve müşteri memnuniyetini artırmaya,
- Mevcut ürünü iyileştirmeye yönelik konularda,
- Çevre (atık ve atık bertarafının azaltılması, geri dönüşümün artırılması, çevresel risklerin azaltılması vb.)
- Makineler ve proseslerde iyileştirme,
- Ürün kalitesinde iyileştirme,



	<b>ÖNERİ DEĞERLENDİRME SİSTEMİ PROSEDÜRÜ</b>	Doküman No : SF.IK.PR-010 R.Tarihi : 29.03.2022 Rev. No : 0 Sayfa No : 2 / 3
---	--	---

Bunun gibi konularda, Süper Film Ambalaj Sanayi ve Tic. A.Ş.'nin gelişimine ve iyileşmesine katkı sağlayacak öneriler yapabileceklerdir.

5.2. Aşağıda belirtilen konular “öneri kapsam dışında” olarak değerlendirilir.

- İşe personel alma ve işten personel çıkarma konularında
- Yasalara, genel kabul görmüş kural ve uygulamalara, şirket politikalarına aykırı konularda,
- Bireysel ve toplu kişisel talepler (dilek, yakınma, şikâyet) konularında,
- Kişilerin şahsi menfaatlerine yönelik konularda,
- Uygulamada olan öneriler.

Yukarıdaki belirtilen maddelere uygun öneriler; “öneri kapsam dışında” olarak değerlendirilir ve ön değerlendirmede “Red” olarak öneri formunda belirtilir.

### 5.3. Önerilerin onaylanması

Onaylanan öneriler, “öneri kapsam içinde” olarak değerlendirilir ve ön değerlendirmede sonrası kurul onayına sunulur. Sonuçlar değerlendirme kurulu tarafından değerlendirilerek onaylanır. Aksiyon alınır ise süre verilir ve sürenin tamamlanması beklenir. Bütün öneriler (gerçekleştirilemeyecek öneriler) nedenleri ile birlikte öneri sahibine iletilir. Onaylanmayan öneriler için Öneri Değerlendirme Kurulu'nun, öneri verilen bölümden sorumlu üyesi tarafından teşekkür edilerek kapatılır.

### 5.4. Önerilerin Sunumu

Çalışanlar önerilerini, Öneri Formu' nu doldurarak Öneri Kutularına atıp veya <http://isg.superfilm.com/> adresinden Öneri Formu linkini tıklayarak açılan sayfadan gerekli yerleri doldurarak öneri verilebilir.

### 5.5. Önerinin Geçerli Kılınması

Önerinin geçerli kılınabilmesi için yapılan faaliyet veya projenin kurul tarafından belirlenen sürede izlenir. İzleme iki aşamadan oluşur.

1. **Aşama** önerinin proje döneminde izlenmesi
2. **Aşama** önerinin 3 ay ve/veya 6 ay sonra tekrar izlenerek amaçlanan getirinin yüzde kaçını gerçekleştirdiğinin ölçülmesidir.

Öneri geçerli kılındıktan sonra puanlama aşamasına geçilerek “Öneri Değerlendirme Formu” üzerindeki kriterler doğrultusunda puanlama yapılır. Öneri hangi bölüm ile ilgili ise Kurul

	<b>ÖNERİ DEĞERLENDİRME SİSTEMİ PROSEDÜRÜ</b>	Doküman No : SF.İK.PR-010 R.Tarihi : 29.03.2022 Rev. No : 0 Sayfa No : 3 / 3
---	--	---

üyelerinden o bölüm sorumlusunun onayı sonrası Operasyondan Sorumlu Genel Müdür Yardımcısı'na sunulur. Genel Müdür Yardımcısı onayı sonrası İK bölümüne puanlanmış hali teslim edilir.

#### 5.7. Onaylanan Önerilerin Puanlanması

Önerilerin puanlanması, sistemsel ve maliyet olarak iki başlık altında değerlendirilerek yapılır. Değerlendirilen öneri puanı tek tek belirlenerek toplam alınan puan oluşturulur.

#### 5.6. Onaylanan Önerilerin Ödüllendirilmesi

İnsan Kaynakları tarafından,

Değerlendirme ve ödüllendirme ayda bir yapılır.

Değerlendirme sonucunda alınan puan; kişinin brüt aylık ücretinin yüzdesi olarak ve yine brüt olarak maaşına yansıtılır.

Grup olarak verilen önerilerde alınan puan; her üyenin kendi brüt maaşının yüzdesi olarak hesaplanır ve Genel Müdür onayına sunulur.

Önerilerin patent ve telif hakları Süper Film Ambalaj Sanayi ve Tic. A.Ş.'ye aittir, şirket bu önerileri dilemediği zaman ve yerde kullanma hakkına sahiptir. Öneri veren kişi bunu kabul etmiş sayılır.

## 6. DOKÜMANTASYON

### 7. DAĞITIM

Bu Prosedür dağıtımı QDMS üzerinden yapılır.

### 8. REVİZYON DURUMU

Tüm revizyonlar ve nedenleri QDMS üzerinden takip edilecektir.

HAZIRLAYAN BAHAR AĞAÇKIRAN	ONAYLAYAN GÜLER OĞUZ
İNSAN KAYNAKLARI UZMANI	İNSAN KAYNAKLARI MÜDÜRÜ



**Şehit Cevdet Özdemir Mah. Öveçler 4. Cad.,  
1351. Sok., No:1/6-7, Çankaya/ANKARA  
Tel: 0.312.479 84 00 (pbx), Faks: 0.312.479 84 99  
[www.mgsmuhendislik.com](http://www.mgsmuhendislik.com)**