FINAL REPORT

Shopping Mall Projects of Rönesans Gayrimenkul Yatırım A.Ş.

Corporate Stakeholder Engagement Framework

Submitted to:

Rönesans Gayrimenkul Yatırım A.Ş.

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DEFINITIONS[1]

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

Grievance Mechanism: The European Bank for Reconstruction and Development's Environmental and Social Policy (EBRD ESP, 2019) defines a Grievance Mechanism as a process that allows individuals, groups, or communities affected by a project to raise concerns or complaints regarding the project's environmental and social performance. A Grievance Mechanism is expected to be accessible, transparent, and responsive, providing a formal process for acknowledging, assessing, and addressing grievances in a timely and culturally appropriate manner.

The IFC Good Practice Note: Addressing Grievances from Project-Affected Communities (September 2009) defines a grievance as a concern or complaint raised by an individual or a group within communities affected by Company operations. Both concerns and complaints can result from either real or perceived impacts of a Company's operations and may be filed in the same manner and handled with the same procedure. The difference between responses to a concern or a complaint may be in the specific approaches and the amount of time needed to resolve it.

Project Affected People: Project affected people refer to the individuals and communities likely to be subject to the environmental and social impacts caused by the Project.

Stakeholder: Stakeholders are persons or groups who are directly or indirectly affected by a Project, as well as those who may have interests in a Project and the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses.

Public Consultation: EBRD ESP, 2019 defines Public Consultation as a structured process designed to facilitate open dialogue between project proponents and stakeholders, especially those potentially affected by a project. Public Consultation is intended to inform stakeholders about the project, gather their feedback, and incorporate their views and concerns into the project's design, planning, and implementation.

Stakeholder Engagement Plan: The Stakeholder Engagement Plan (SEP) is a strategic document that guides stakeholder consultations and communications throughout the entire project lifecycle, from initial planning and Environmental and Social Impact Assessment (ESIA) studies through to project implementation, operation, and eventual decommissioning. According to the EBRD Environmental and Social Policy (EBRD, 2019), the SEP is a dynamic, "living" document that should be updated regularly to reflect ongoing stakeholder engagement needs and to provide a roadmap for participation in monitoring and evaluating the effectiveness of impact mitigation measures. The SEP ensures that stakeholders are informed and involved at all stages of the project, fostering transparency, accountability, and trust between the project and its stakeholders..

Vulnerable Groups: Vulnerability status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinions, national or social origin, property, birth, or status. The client should also consider gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

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[1] The definitions presented in here are directly quoted from The European Bank for Reconstruction and Development's Environmental and Social Policy (EBRD ESP, 2019), and the Performance Standards and the Guidance Notes of IFC.

Acronyms and Abbreviations

"Client" or "RGY"	Rönesans Gayrimenkul Yatırım A.Ş.
WSP Türkiye	WSP Danışmanlık ve Mühendislik Ltd. Şti.
AoI	Area of Influence
AYGM	General Directorate of Infrastructure Investments
CLO	Community Liaison Officer
CIMER	Presidential Communication Centre (Cumhurbaşkanlığı İletişim Merkezi)
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EPFI	Equator Principles Financial Institutions
EPs	Equator Principles
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
HRR	Human Resources Representative
IFC	International Finance Corporation
KPIs	Key Performance Indicators
LRP	Livelihood Restoration Plan
MoTI	Ministry of Transport and Infrastructure
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGOs	Non-Governmental Organisations
PAP	Project Affected People
PSs	Performance Standards
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
TCDD	Turkish Republic State Railways
TMMOB	Union Chambers of Turkish Engineers and Architects
TOBB	Union of Chambers and Commodity Exchanges of Türkiye

1.0   INTRODUCTION

1.1   Overview

The European Bank for Reconstruction and Development ("EBRD") signed a Loan Agreement with Rönesans Gayrimenkul Yatırım Inc. ("RGY") to support shopping mall investments of the Company.

As a part of this loan agreement, an Environmental and Social Action Plan ("ESAP") was prepared to define, establish and implement the environmental and social actions to be taken by Borrower according to EBRD Performance Requirements.

This Corporate Stakeholder Engagement Framework serves as a general guideline for developing Stakeholder Engagement Plan ("SEP") for each RGY Shopping Malls (referred to as the "Project" or "Mall") and acts as a reference document.

The following actions in the ESAP are specifically related to the development and implementation of the SEPs for all Projects. This Corporate Stakeholder Engagement Plan Framework has been prepared by WSP Mühendislik ve Danışmanlık Ltd. Şti. ("WSP") to meet the following requirements:

- Develop a corporate level stakeholder engagement framework and implement specific SEPs at mall level based on the framework guidance,

- Include and engage SEPs with the national/local authorities to align infrastructure improvements (flood, seismic risks and other risks) with the future plans of the local authorities, and

- Maintain and continue to implement a community grievance mechanism. The existence and functioning grievance mechanism (mainly for customers of the malls) should be communicated to affected people by a variety of channels and reinforced throughout stakeholder engagement activities.

1.2   Purpose of the Corporate Stakeholder Engagement Framework

The purpose of this Corporate Stakeholder Engagement Framework is to create a structured approach for effectively communicating and building trust with RGY stakeholders. The SEP Framework aims to align stakeholder interests with the corporate strategic goals of RGY, mitigate potential risks, and foster ongoing collaboration.

This document provides a framework for stakeholder engagement to demonstrate effective, meaningful, consistent, comprehensive, coordinated, and culturally appropriate engagement in line with all relevant regulations, international standards and good industry practices for all RGY operations.

This framework is supported by comprehensive guidance, practical tools, and templates to establish a structure for stakeholder engagement practices and the management of RGY operations. It assists RGY staff in planning, designing, executing, and evaluating stakeholder engagement activities.

The primary objectives of the framework are as follows:

- Guide RGY parties in preparing project-specific Stakeholder Engagement Plans that align with corporate goals and structure,

- Ensuring stakeholder identification and analysis,

- Creating a structure to foster meaningful interactions with the stakeholders and address stakeholder needs,

- Ensuring compliance with relevant regulations and international standards,

- Supporting sustainable and socially responsible business practices,

- Aligning stakeholder interests with corporate strategic goals,

- Providing resources and support for staff in the prepation of stakeholder engagement activities and plans.

- Integrating stakeholder engagement processes in corporate-level management across all operations.

This framework serves as a comprehensive guide for RGY parties to create Project-specific SEPs for each mall that align with corporate goals and structure, and to effectively engage with stakeholders. It ensures that all interactions are meaningful, consistent, and aligned with both corporate goals and regulatory standards. By following this framework, RGY staff can ensure that all stakeholder interactions are meaningful, consistent, and compliant with regulatory standards, ultimately building stronger relationships and achieving sustainable success.

1.3   Company Profile

RGY is a prominent real estate development and investment company under Rönesans Holding. Combining over 30 years of construction expertise with 22 years of real estate experience, RGY manages projects with a total construction area of 1.5 million square meters and a gross leasable area of 740,000 square meters. The company is known for its innovative projects, such as the Hilltown shopping centers in Küçükyalı and Karşıyaka, which blend shopping, entertainment, and dining in unique architectural settings. RGY's strategic partnerships with international firms like GIC, Meridiam Infrastructure, and IFC highlight its robust financial and engineering capabilities.

2.0   REGULATORY REQUIREMENTS

2.1   Turkish Requirements for Stakeholder Engagement Plan

2.1.1   The Constitution of the Republic of Türkiye

"The Constitution of the Republic of Türkiye" is the main document related to the stakeholder engagement component of the Company. The articles of the Constitution related to engagement issues are listed below:

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Freedom of Expression and Dissemination of Thought

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

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VIII. Health, the Environment and Housing

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment and to prevent environmental pollution.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - XI. Conservation of Historical, Cultural and Natural Wealth

ARTICLE 63. The state shall ensure the conservation of the historical, cultural, and natural assets and wealth and take supportive and promotive measures towards that end.

PART TWO - FUNDAMENTAL RIGHTS AND DUTY - VII. Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

2.1.2 Other Main National Laws/Regulations

I. Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Company Operations.

II. Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organisations, which qualify as public institutions.

III. Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

IV. Expropriation Law

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

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

VI. Environmental Law

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to the Environmental Law, citizens and the state bear responsibility for the protection of the environment based on the "polluter pays" and "user pays" principles. The law is supported by numerous regulations and decrees prepared or updated in the process of alignment with European Union legislation.

EIA Regulation Stakeholder Engagement Plan

The main stages of the Environmental Impact Assessment (EIA) are defined by the Turkish EIA Regulation (29.07.2022, OG No. 31907). The projects requiring an EIA Report and the EIA process and other relevant principles and procedures are detailed in the EIA Regulation. The first Turkish EIA Regulation was put into force in 1993, and it was amended in 1997, 2002, 2003, 2008, 2013 and 2014. Finally, the last EIA Regulation came into force on July 29th, 2022. According to the Turkish Republic Ministry of Environment, Urbanisation and Climate Change (MoEUCC) EIA Regulation (Official Gazette July. 29, 2022; No: 31907), relevant requirements related to the EIA process have been disclosed to the public.

This EIA Regulation version mandates the preparation of a Stakeholder Engagement Plan (SEP) as part of the EIA application process. This plan is crucial for ensuring effective public participation and transparency throughout the project's lifecycle. The SEP outlines the methods for identifying and engaging stakeholders, including public participation meetings, information disclosure, and grievance mechanisms. It aims to gather public opinions and suggestions, fostering a collaborative environment between project developers and the community. This approach not only enhances the project's social acceptance but also helps in addressing potential environmental and social impacts more effectively.

2.2   International Standards

2.2.1   EBRD Performance Requirements

EBRD is committed to promoting environmentally sound and sustainable development. This commitment is outlined in its Environmental and Social Policy, particularly referencing Performance Requirement 10 (PR10): Information Disclosure and Stakeholder Engagement. PR10 establishes guidelines and expectations regarding the engagement of stakeholders and the disclosure of information throughout project implementation. Additionally, EBRD outlines stakeholder engagement requirements in documents such as PR10 itself and the 2019 Access to Information Policy. These policies underscore the importance of transparency, communication, and involvement of various stakeholders throughout the project lifecycle, aligning with the EBRD's broader goal of promoting sustainable development and environmental consciousness in its supported projects.

Hence, the following standards will be applicable for the Project SEP:

- PR10 Information Disclosure and Stakeholder Engagement,

- The Access to Information Policy

As per the international standards, the Project-specific SEPs must be living documents subject to periodic review and updates. Any changes in Mall activities, altered designs, newly recognized stakeholders, or emerging operations will be updated in the SEP. The main components of the Project-specific SEPs will contain the following:

- **Stakeholder Identification and Analysis:** Identification of all stakeholders, including both primary stakeholders (directly affected) and secondary stakeholders (indirectly affected), to understand their interests, needs, concerns, and potential influence in order to prioritize and tailor engagement strategies.

- **Information Disclosure:** Transparent sharing of Project-related information with stakeholders to keep them informed about the Project activities and developments.

- **Stakeholder Engagement Programme:** Development of a program that outlines the overall strategy and approach for engaging with stakeholders throughout the Project's lifecycle.

- **Stakeholder Engagement Strategies/Tools:** Defining specific techniques and resources used to interact with stakeholders effectively, such as public participation meetings.

- **Grievance Mechanism:** Developing an accessible and transparent grievance mechanism to address and resolve complaints from affected stakeholders.

- **Roles and Responsibilities:** Defining roles and responsibilities within the Project for stakeholder engagement activities to ensure accountability and effective implementation.

- **Monitoring:** Systematic observation and assessment of stakeholder engagement activities to evaluate their effectiveness and make adjustments, as necessary.

- **Reporting:** The regular documentation and communication of stakeholder engagement efforts, progress, and outcomes to provide transparency and accountability throughout the Project's lifecycle.

2.2.2   IFC Performance Standards

IFC's Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. PSs establish standards that the client is to meet throughout the life of an investment by IFC. Applicable standards guiding social studies are as follows:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

- Performance Standard 2: Labour and Working Conditions

- Performance Standard 4: Community Health, Safety, and Security

- Performance Standard 5: Land Acquisition and Involuntary Resettlement

- Performance Standard 8: Cultural Heritage

In response to stakeholder engagement, PS1 requires the client to develop and implement a SEP that is scaled to the Project risks and impacts and development stage and be tailored to the characteristics and interests of the affected communities. The SEP to be include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do represent the views of affected communities and that they can be relied upon to communicate the results of consultations to their constituents faithfully.

PS1 specifically requires proponents to:

- Identify and evaluate environmental and social risks and impacts of the Project.

- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate, or offset for risks, and impacts to workers, affected communities, and the environment.

- Promote improved environmental and social performance of clients through the effective use of management systems.

- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.

- Promote and provide adequate engagement with affected communities throughout the Project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.

2.2.3   Equator Principles (EP4)

The EPs is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs.

The Client is committed to complying with the following EPs:

- Principle 1: Review and Categorisation.

- Principle 2: Environmental and Social Assessment.

- Principle 3: Applicable Environmental and Social Standards.

- Principle 4: Environmental and Social Management System and EPs Action Plan.

- Principle 5: Stakeholder Engagement.

- Principle 6: Grievance Mechanism.

- Principle 7: Independent Review.

- ■ Principle 8: Covenants.

- ■ Principle 9: Independent Monitoring and Reporting.

- ■ Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, "For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. The client will tailor its consultation process to the risks and impacts of the Project, the Project's phase of development, the language preferences of the affected communities, their decision-making processes, and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation".

"To facilitate stakeholder engagement, the Company will be commensurate to the Project's risks and impacts, make the appropriate assessment documentation readily available to the affected communities, and where relevant other stakeholders, in the local language and a culturally appropriate manner."

"The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis."[2]

Principle 6 in specific sets out that "For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process."

2.2.4   Relevant International Conventions and Protocols

Various international human rights standards and treaties has been ratified by Türkiye. Some of the key human rights standards applicable in Türkiye include:

- ■ Universal Declaration of Human Rights (UDHR): Turkey is a member of the United Nations and is thus bound by the principles outlined in the UDHR, which covers a wide range of civil, political, economic, social, and cultural rights.

- ■ European Convention on Human Rights (ECHR): Turkey is a member of the Council of Europe and thus a party to the ECHR, which protects fundamental rights and freedoms, including the right to life, prohibition of torture, right to a fair trial, freedom of expression, and others.

- ■ International Covenant on Civil and Political Rights (ICCPR): Türkiye is a signatory to the ICCPR, which covers rights such as the right to life, freedom of speech, freedom of assembly, and the right to a fair trial.

- ■ Convention on the Elimination of All Forms of Discrimination against Women (CEDAW): Türkiye has ratified CEDAW, which aims to eliminate discrimination against women and promote gender equality.

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[2] **https://equator-principles.com/**

- Protocol No. 4 to the Convention for The Protection of Human Rights and Fundamental Freedoms Securing Certain Rights and Freedoms Other Than Those Already Included in the Convention and in the First Protocol Thereto

- Report of The Office of The United Nations High Commissioner for Human Rights on the International Workshop on Enhancing Cooperation Between International and Regional Mechanisms for The Promotion and Protection of Human Rights

- The Role of The Ombudsman, Mediator and Other National Human Rights Institutions in the Promotion and Protection of Human Rights

- Protocol to the Convention for the Protection of Human Rights and Fundamental Freedoms

- European Social Charter

2.3   Corporate Standards

The Company has the following policies and procedures, which are implemented for the current operations and will be applicable all projects:

- Ethical Principles and Employee Code of Conduct Procedure

- Human Resources Policy

- Whistleblowing Policy

- Environmental, Social and Governance Policy

3.0   STAKEHOLDER ENGAGEMENT PLAN

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,

- ongoing reporting to affected stakeholders.

Stakeholder Identification and Analysis: Stakeholder identification and analysis is a critical step in the stakeholder engagement process. This involves systematically identifying all individuals, groups, or organizations that may be affected by or have an influence on the project. Once identified, stakeholders will be analyzed to understand their interests, needs, and levels of influence.

Information Disclosure including Grievance Mechanism: Information will be provided to stakeholders on relevant aspects of the project, including its purpose, nature, scale, and duration. This will encompass the risks to and potential impacts on stakeholders, along with proposed mitigation plans. The process for managing grievances will also be clearly communicated to ensure transparency and accountability.

Meaningful Consultation: Consultation will be conducted in accordance with the project's level of impact and in compliance with legal requirements. It will be inclusive and culturally appropriate, free from external manipulation, interference, or intimidation. It will be initiated at the earliest possible stage and maintained throughout the project, as appropriate, with necessary documentation.

Reporting Back to Stakeholders: Ongoing reporting to affected stakeholders will ensure they are kept informed about project progress, decisions, and any changes that may impact them. This continuous communication will help maintain transparency and build trust throughout the project lifecycle.

During the preparation of a SEP, all RGY parties will:

■ Determine all project stakeholders via comprehensively examining stakeholders from all levels, from the local community and public institutions to national and international stakeholders.

■ Develop a plan for managing relationships with stakeholders, assessing the impact of stakeholder engagement on the project, establishing communication channels, and determining the appropriate contact frequency for stakeholders.

■ Engage in proactive stakeholder communication at the local level to mitigate potential adverse impacts of the project on affected communities and facilitate local community benefits from the project's potential positive outcomes.

■ Document and address the concerns and requests of stakeholders in a timely manner.

■ Develop methods for ensuring access to the project for especially vulnerable/disadvantaged groups/individuals in the context of local stakeholder participation.

■ Monitor and ensure adherence to culturally appropriate communication style and method in all interactions.

■ Identify and create opportunities for stakeholder engagement through the use of various communication channels to ensure effective stakeholder participation.

■ Provide opportunities for other groups affected by the project, particularly non-governmental organizations (NGOs), to express their opinions on the proposed actions during the project's life cycle.

■ Develop a comprehensive action plan, specifically tailored to the needs of the project, which outlines the stakeholder engagement strategy and ensures that the procedures are monitored and reported on.

The following parts consist of the components of a Project-specific SEP.

3.1   Stakeholder Identification

A SEP must include stakeholder identification and mapping, which is typically updated annually. The objective of stakeholder identification is to prioritize project stakeholders for informed consultation and participation. This is an ongoing process, and the list of identified stakeholders should be assessed and updated according to the outputs of the engagement activities, the different phases of the project, and project updates. This approach allows RGY parties to guarantee a transparent and accessible engagement process for all stakeholders through a stakeholder engagement strategy.

Stakeholder identification to be included in the SEPs will be conducted through:

■ Conducting a comprehensive review of existing project documents, reports, and databases to identify potential stakeholders.

■ Mapping out the stakeholders based on their influence, interest, and impact on the project.

■ Conducting engagement activities and consultations with key stakeholders during the scoping phase to validate the preliminary stakeholder list,

■ Categorizing stakeholders into primary, secondary, and tertiary groups based on their level of influence and interest,

■ Establishing a system for continuous monitoring and updating of the stakeholder list to reflect any changes in the project.

In general, stakeholders can be categorized into two groups:

- **External stakeholders:** External stakeholders of the project or RGY include individuals, groups, or organizations that are not directly involved in the day-to-day operations but are affected by or have an interest in the project's outcomes. These stakeholders can encompass customers, suppliers, investors, regulatory bodies, community members, non-governmental organizations (NGOs), and the media. To define external stakeholders, it is important to identify those who have a significant impact on or are impacted by the project.

- **Internal stakeholders:** Internal stakeholders of the project or RGY typically include employees, management, and board members. These individuals are directly involved in the organization's operations and decision-making processes. This includes staff members across various departments, project managers, executives, and any internal committees or working groups.

Such distinction between stakeholders allows for the identification of specific needs of the stakeholders of RGY, as well as the indication of their respective effects on or within the project. The stakeholder analysis outlines the roles of internal stakeholders in the project, institutional stakeholder participation, and their involvement. In the analysis of external stakeholders, the following aspects are discussed: the role of stakeholders, the method, frequency, and subject of the relationships to be established with stakeholders during the project.

The key stakeholders of a project can include but not limited to the following:

- Government entities, including the Republic of Turkey, relevant ministries, municipalities, and other local authorities,

- Local Public Administration,

- Lenders,

- International, national, and local NGOs,

- Educational and training institutions (e.g., universities, colleges, and think tanks),

- Industrial sector (e.g., construction and infrastructure trade bodies). Businesses and individuals with a direct interest in the project and/or activity, e.g., running businesses or providing services and supplies to the company. Suppliers of goods and services, contractors,

- Internal stakeholders (e.g., employees, employee representatives, trade unions),

- Project-affected persons (PAPs). Communities (e.g., affected settlements, local community groups),

- Vulnerable groups in the affected settlements,

- Employees and company shareholders,

- Media.

3.2   Stakeholder Groups at Corporate Level

Table 1 below outlines the general categories of stakeholders according to the information provided in 3.1, in order to present a framework for understanding who constitutes a stakeholder.

Table 1: General Stakeholder Categories

Stakeholder Groups	Main Stakeholders	Relevance
External Stakeholders		

Stakeholder Groups	Main Stakeholders	Relevance
National Institutions: The national government plays a pivotal role in shaping the policy landscape for businesses and projects alike. It is responsible for establishing policy, granting permits and approvals, and monitoring and enforcing compliance throughout the entire project or activity life cycle.	Ministry of Environment, Urbanization, and Climate Change Ministry of Trade Ministry of Interior Ministry of Labor and Social Security Ministry of Treasury and Finance Ministry of Industry and Technology Ministry of Culture and Tourism	Policy formulation Permitting Regulation
Local Institutions: Local government plays a vital role in the business and/or project's operations. They are responsible for implementing legislation and development plans and policies at the municipal or commune level. Furthermore, the municipalities and communes in the project area will be affected by the project. It is essential that they are kept informed of progress and plans in their area, and that they consider the Project activities in their policymaking, regulatory and other duties, as well as activities.	Governorships of Related Provinces Municipalities Provincial Directorate of Environment, Urbanization, and Climate Change Provincial Directorate of Labor and Social Security Provincial Directorate of Culture and Tourism Türkiye General Directorate of Security and Traffic Directorate Directorate of Land Registry Provincial Directorate of Transportation Water, Gas, and Electricity Supply Companies Local Chambers of Commerce and Industry Directorate of National Real Estate National Security Council	Social and economic development, Corporate Social Responsibility, Management of environmental and social impacts, Permitting, Regulation
Lenders	International finance institutions	Project Finance Environmental and social impacts
NGOs: International, national, and local NGOs with a direct interest in the project and activity, as well as associated facilities and their social and environmental aspects, have the ability to influence the project and/or activity directly or indirectly through public opinion.	TÜSİAD (Turkish Industrialists and Businessmen's Association) TOBB (Union of Chambers and Commodity Exchanges of Türkiye) ÇEKÜL Foundation TEMA Foundation Greenpeace Türkiye KAGIDER (Women Entrepreneurs Association of Türkiye) Women's Solidarity Foundation Six Dots Association for the Blind Spinal Cord Paralytics Association of Türkiye United Nations Global Compact (UNGC) SKD Türkiye (Business Council for Sustainable Development) Chamber of Commerce Association for Solidarity with Asylum Seekers and Migrants (ASAM) Worker Rights Association	Management of Environmental and Social impacts, Corporate Social Responsibility Environmental and social impacts Cumulative impacts Economic development Inclusivity and accessibility Security impacts

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Stakeholder Groups	Main Stakeholders	Relevance
Vulnerable Groups: It is possible that vulnerable groups may be affected by the project or activity due to factors such as physical disability, social or economic standing, limited education, lack of employment, or access to land.	The poor/elderly/people with disabilities in the Project affected settlements	Community health and safety impacts
Educational Institutions	Universities, Vocational schools, Schools in Affected Settlements.	Technical Consultancy Corporate Social Responsibility Capacity Building
Business Environment: This category includes businesses and individuals who have a direct interest in the project and/or activity. This may include, for example, businesses that provide services or supplies to the company.	Contractors and subcontractors (construction, maintenance, consulting, and engineering services providers, installations, and equipment suppliers) Suppliers Project Developers and Investors Local Enterprises and small businesses Private transportation services (taxis, minibuses)	Supply of goods & services for project site and headquarters Traffic impact Economic displacement
Media	Local and national newspapers, TV channels Social media, LinkedIn, Facebook, etc.	Providing correct Project information to communities Advertisements
Project Affected Persons (PAPs): The project may affect the households and communities located in or around the site. This encompasses individuals residing on land impacted by the project and/or activity, whether through direct (temporary) land acquisition or due to social and environmental implications. It also includes those who visit or utilize land or resources that may be influenced. The primary stakeholders are the landowners and land users.	Project-Affected People Mukhtars	Downstream Impact / Community Health & Safety Management of environmental and social impacts, Corporate Social Responsibility
Internal Stakeholders		
Company Shareholders	Rönesans Varlık ve Proje Yatırımları A.Ş., Euro Cube Private Limited, Kamil Yanıkömeroğlu, Murat Özgümüş and public	Reputation regarding Environmental and Social Business growth and shareholder value
Employees	RGY and its subsidiaries' employees Contractors and their Employees	Labor and working conditions Local procurement Environmental and social impacts
Tenants	Tenants of the shopping malls	Social and economic development, Corporate Social Responsibility, Reputation of the brands.

Stakeholder Groups	Main Stakeholders	Relevance

4.0   STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement is an umbrella term encompassing a range of activities and interactions over the life of a projectt (EBRD, 2019). According to the standards set by EBRD (2019), a Project-specific SEP for each mall include the following in terms of stakeholder engagement:

- Stakeholders will be engaged early and throughout the Project lifecycle to identify potential issues and project opportunities.

- Regular communication and involvement will be ensured to build trust and transparency, fostering a positive relationship between the Project and stakeholders.

- Open, honest, and transparent communication will be maintained with stakeholders to keep them informed and engaged.

- Regular updates on project progress, changes, and outcomes will be provided to keep stakeholders informed and involved.

RGY will maintain an open-door policy regarding stakeholder engagement. The Corporate SEP Framework and all relevant social and environmental policies and documentation will be made available on the RGY website (https://rgy.com.tr/). The Project-specific SEPs will be disclosed at the websites of the corresponding Malls (https://kahramanmaraspiazza.com/tr and https://sanliurfapiazza.com/tr). Furthermore, the Project-specific SEPs will be made available in printed format at the Project site, the relevant municipality, and the mukhtars' offices in affected settlements.

RGY engages with stakeholders at all levels. The level of engagement, degree of interaction, and methods of engagement vary according to the roles and responsibilities of the departments involved. This section provides a summary of RGY's stakeholder engagement activities.

Engaging with Internal Stakeholders

RGY will engage with internal stakeholders through regular and transparent communication channels, such as team meetings, internal newsletters, and collaborative platforms. By fostering an inclusive environment, RGY will ensure that employees, management, and board members are kept informed about project developments, goals, and challenges. This engagement will include opportunities for feedback and active participation in decision-making processes, ensuring that the insights and expertise of internal stakeholders are integrated into the project's planning and execution. Through these efforts, RGY will build a cohesive and motivated team, aligned with the project's objectives and committed to its success.

RGY aims to foster a positive organizational climate, communication, and culture in alignment with its people and culture practices. Consequently, RGY prioritizes the advancement of its employees' leadership capabilities and the provision of comprehensive training and development opportunities, along with the assurance of equal access to all personnel. RGY will conduct annual employee engagement surveys to measure employee engagement and experience, and to ensure that the company provides the best possible working conditions.

Engaging with State and Local Authorities

RGY actively engages with state and local authorities to address various aspects of its operations, extending beyond environmental impact assessments to encompass a broader range of responsibilities essential for the safe and efficient operation of its facilities. Each investment is subject to an environmental impact assessment in accordance with the Environmental Impact Assessment Procedure. The Environmental Aspect Impact Assessment Table Form is prepared on an annual basis for each unit engaged in operational and maintenance

activities. In the context of new investments and modifications, the "New Investments and Modifications Environmental Impact Assessment Form" is utilized to assess the environmental impacts prior to and following the implementation of the investment or modifications.

For the malls, recognizing the importance of community safety and operational harmony, RGY parties will engage with authorities on issues such as security, health and safety, traffic management, emergency response, and corporate social responsibility initiatives. RGY's engagement approach will be tailored to the unique needs of each mall, ensuring that their operations align with local priorities and address any community-specific challenges.

RGY recognizes the importance of developing a regulatory framework that encourages investments, efficiency, and quality to ensure a reliable and cost-effective network infrastructure in Turkey. To support this, RGY plays an active role in the process by liaising with government agencies and regulatory bodies. RGY is committed to maintaining transparent, impartial, and equitable relations with the public and adheres to the highest standards of corporate governance in its interactions with public institutions.

Engaging with Local Communities

Currently all shopping malls by RGY established by private investment, thus, a land acquisition process has not been initiated. However, it is possible that the future projects might require the permanent acquisition of private land due to the necessity of investments. In that case, RGY will identify any landowners or users who will be directly affected. RGY will further provide affected landowners/users with information and consultation regarding land acquisition and compensation procedures, legal rights, and land use restrictions during construction and operation, in line with EBRD's PR5 requirements. This can be conducted through written notifications, community leaflets, posters, newsletters, and face-to-face meetings. In all cases, RGY will maintain records of, monitors, and responds to PAPs' concerns and requests.

In addition, RGY has a Social Management Procedure that applies to all of its facilities. This procedure covers guidelines for social impact assessment, public consultation, grievance/demand mechanism, land acquisition and compensation process, social support for community benefit, facility-based plans and implementation, and social management system. In accordance with the Social Management Procedure, RGY adheres to the international social performance standards and Sustainable Development Goals in addition to national standards and regulations.

Engaging with Non-Governmental Organizations (NGOs)

The company is a market leader in its sector, with a strong track record of engagement with sector-specific NGOs. RGY is a member of a number of organizations where sector-specific developments are discussed on an ongoing basis. RGY places a particular emphasis on engaging with NGOs that are directly involved with vulnerable groups in the area of influence, as well as institutions that advocate for equal rights and opportunities.

4.1.1   Engagement Action Plan

Table 2 represents stakeholder engagement activities with specific methods, tools, frequency, and targets/evaluation criteria. Following an analysis of its stakeholders, RGY will establish communication platforms and methods, communication frequency, as well as target and evaluation criteria to measure the success of stakeholder engagement.

Table 2: Generic Stakeholder Engagement Activities

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
National Institutions	All communication with the relevant authorities is conducted in accordance with established procedures and regulations. The	Identification will be carried out in accordance with the requirements	Maintaining continuous, open, and transparent communication on

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
	communication is facilitated through the following distribution channels: ▪ official letters, phone, or email, ▪ meetings with the administration/representatives of the Company, ▪ public events/meetings,	of the relevant stakeholders for each mall.	permitting, regulation, and operational issues. Ensuring compliance with national regulations. Tracking the number of visits conducted. Documenting official correspondence.
Local Institutions	Communication with authorities is conducted in accordance with established procedures and regulations. The communication is facilitated through the following distribution channels: ▪ official letters, phone, or email, ▪ meetings with the administration/representatives of the Company, ▪ public events/meetings,	Identification will be carried out in accordance with the requirements of the relevant stakeholders for each mall.	It is essential to maintain consistent, transparent, and open communication regarding permitting, regulatory, and operational matters. Adherence to national regulations
Lenders	▪ Face-to-face meetings ▪ Conferences ▪ Phone calls ▪ Periodical Monitoring Reports (Annual Monitoring Reports, Operation Reports, Consultant's Operational Monitoring Reports)	Identification will be carried out in accordance with the requirements of the relevant stakeholders for each mall.	Sustaining continuous, open, and transparent communication on environmental & social & technical, and financial issues of operations Compliance with international requirements Company credibility and financial sustainability
NGOs	▪ Company website ▪ Meetings ▪ Letters ▪ Email ▪ Phone	Continuously throughout the year	Increasing stakeholder engagement for Company's corporate social responsibility topics
Vulnerable/Disadvantaged Group/Individuals	Once the company has identified vulnerable groups and/or individuals, these will be engaged to ascertain any specific information or consultation needs that may arise in order to address any concerns or impacts. Communication will be tailored according to necessity, and may include face-to-face meetings, phone, and email/mail communication.	Continuously throughout the year	Managing the social risks of the projects and mitigating the adverse impacts Informing PAPs accurately. Improving stakeholder engagement
Education Institutions	▪ Face-to-face meetings	Continuously throughout the	Ensuring collaboration and information sharing

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
	▪ Conferences ▪ Joint projects ▪ Site visits	year	with the universities and vocational schools through joint projects, Ensuring collaboration with schools at a local level for social projects on education. Attracting qualified talents by attending university/ digital career fairs
Business Environment	The company website, along with its log, is the designated platform for registering requests for information from suppliers. Tender opportunities are available on the dedicated page of the company's portal. Potential partners may communicate with the company through the following channels: ▪ meetings with the administration /representatives of the Procurement Department ▪ Business associations, ▪ Tenders for the purchase of services or goods, ▪ letters, ▪ press releases, ▪ public events, ▪ email, phone.	Continuously throughout the year	Supporting the development of local suppliers Delivery of goods & services on time for the availability Giving priority to local procurements Increasing the opportunities to make a cooperation with local businesses related to Company's activities,
Project Affected Persons (PAPs)	Communication with residents regarding Company operations and activities is conducted through local municipality and village councils or other relevant bodies, subject to public feedback. The approach may vary by location, rural/urban setting, and the level of interest and impact. Local communication will focus on routine information disclosure, meetings with relevant authorities and councils when necessary, and the use of the grievance mechanism.	Continuously throughout the year	Sustaining continuous, open, transparent, and constructive communication on project-based issues, Ensuring effective usage of the Grievance mechanism, Sustaining open communication with neighbouring institutions about the impacts of the Project.
Media	▪ website, ▪ press releases, ▪ newspaper announcements, ▪ TV and Radio campaigns, ▪ articles, and interviews.	Identification will be carried out in accordance with the requirements of the relevant	Communication with administrators will follow established procedures in line with Turkish regulations.

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Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
		stakeholders for each mall.	
Company Shareholders	▪ General Meeting of Shareholders ▪ Financial reports ▪ Letters	Continuously throughout the year.	Ensuring accurate communication flow Sharing technical, financial, environmental, and social performance transparently Managing social, environmental, and economic sustainability
Employees	▪ Internal meetings w with the administration / Human Resource representatives ▪ Local Committee on the Code of Ethics ▪ Internal releases ▪ Posters ▪ Corporate events ▪ Internal social projects ▪ Internal competitions ▪ Training courses. ▪ Email ▪ Phone	Continuously throughout the year.	Ensuring meaningful consultation mechanisms with the employees Ensuring accessible feedback mechanism for the employees' opinions and grievances Increasing employee engagement & satisfaction Providing a safe working environment and conditions in line with OHS requirements

Table 3 presents a generic Engagement Action Plan, which includes examples of action items that can be defined for stakeholder engagement at various stages of a project lifecycle. The action plan will be updated as needed for each project-specific SEP. The proposed Stakeholder Engagement Action Plan will be further detailed and refined to:

- Include further engagement activities intended to disclose information on project E&S performance and potential impacts,

- Enable stakeholders to understand each Project's risks, impacts, and opportunities,

- Feed back into communities at appropriate levels how the Company considered stakeholders' opinions and inputs during consultation.

Table 3: Stakeholder Engagement Action Plan

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Examples of actions during pre-construction				
Engage stakeholders in the scoping phase of the Projects	All stakeholders	Disclose the Projects via the company website and other relevant communication channels and	Ongoing	The department responsible for external relations and communication

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
		document and feedback received from the public via the available monitoring tools		
Distribute the SEP, NTS and other relevant Project Information	All stakeholders	Ensure the publication of the SEP plan on the website	Before the initiation of construction, works	The department responsible for external relations and communication
Communicate the grievance mechanism and make forms available at the website and accessible places	All stakeholders	Provide a means for stakeholders to communicate grievances, including for impacts related to construction works associated with Project upgrades	As early as possible in the project planning stage	The department responsible for external relations and communication
Regular communication and meetings	Municipal and/or local public administrations	Coordinate information about project activities and disseminate information on the construction timeline. Ensure technical specifications and routing considering infrastructure location, safety buffer requirements, and associated land access restrictions) are communicated on time to avoid potential livelihood impacts.	Communication during pre-construction Additional immediate meetings, if necessary	Investment Department and Contractors
Identification and engagement with affected landowners and users	Landowners affected by the construction works	Identify landowners and users affected by the construction works to obtain access approval when necessary and prevent eventual damages. Distribute leaflet/brochures including information on grievance mechanism as necessary	Before accessing the land	Investment Department and Contractors
Regular communication and meetings at necessary	Local population	Identify vulnerable groups and define appropriate means of making contact,	Communication during pre-construction	Investment Department and Contractors

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Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
with the affected communities		explaining the Project, and understanding their views, Build trust, Listen and collect grievances, Share Information.	Additional immediate meetings, if necessary (for instance, for vulnerable groups)	
Voluntary public meetings if needed	All stakeholders	Discuss environmental and social impacts associated with the works, including land access and compensation for accidental damages, community health, and safety mitigation measures	Before the initiation of construction works	Project Manager and Contractors
Examples of actions during construction				
Dissemination of key information about Project activities request for information/publication as appropriate in the town hall/other public places in the affected localities to bring the given information to the locals	Local population	Disseminate key announcements on Project activities (e.g., construction schedule, grievance procedure, and forms, contact details)	Updated appropriately during the entire construction period	Contractors
Regular communication and meetings at necessary with the affected communities	Local population	Listen and collect grievances, share information.	Communication during construction Additional immediate meetings if necessary (for instance, for vulnerable groups, or if a specific concern arises, or if the works are conducted on private property)	Contractors
Examples of actions during the operation				
Start of operation	Mayors and mukhtars of affected settlements and community members	Inform stakeholders of the start of the operation, any health and safety risks for the communities and mitigation measures	Before the start of the operation	The department responsible for external relations and communication

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Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Up-to-date and complete information regarding the grievance mechanism and the compensation procedure	All stakeholders. Mayors and mukhtars of affected settlements and community members	Inform stakeholders of the scheduled maintenance and The extension works (duration, location, etc.) Disseminate the Compensation Procedure online on the company website	ongoing	The department responsible for external relations and communication
Ongoing information on the annual environmental and social performance of the Company	All stakeholders. Mayors and mukhtars of affected settlements and community members	Inform stakeholders of the Company's annual environmental and social performance by publishing the yearly sustainability report on the Company website	Yearly	The department responsible for external relations and communication

4.2   Stakeholder Engagement Tools and Methods

The consistent use of best practice tools tailored to local context and stakeholders is needed to maximize the effectiveness of the stakeholder engagement. A general example of stakeholder engagement tools and methods, and their usage are presented in Table 4.

Best practice tools will be selected and adapted to fit the unique characteristics of the local context, and the specific stakeholders involved. This customization will ensure that the tools will be relevant and effective in addressing the particular needs and expectations of the stakeholders.

Through the following methods, continuous communication with project's internal and external stakeholders will be maintained through a variety of channels. RGY ensures a variety of communication methods are used to obtain feedback from stakeholders and gain insight into their expectations.

The selection of communication tools and methods is based on two factors: the level of impact and the needs and concerns of the stakeholders. The following section and outline the anticipated engagement methods and means of application for potential stakeholders of the project. The primary language for communication throughout the project will be Turkish. However, to enhance efficiency and ensure the active participation of all stakeholder groups, other languages will be utilized as needed. The engagement activities will be conducted in a culturally appropriate manner and will include the most effective approaches for interacting with stakeholder groups to establish productive relationships for stakeholder engagement.

Table 4: Stakeholder Engagement Methods and Tools

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	Information sharing (technical) on project requirements and impacts. Invitations to meetings and key events during project implementation. Arrangements for obtaining permits, licences, transfer, and allocation of project land.	All stakeholders

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	Information and data requests that will be utilized for project implementation.	
Formal meetings	Collective information sharing on project requirements and impacts. Receiving comments, feedback, views and perception of project from a group of public institutions. Establishing relations with public institutions. Establishing personal connections with key actors.	Different national and local government authorities and officials, NGOs, academia, and organizations/agencies, national and local media.
Community meetings	Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. Receiving comments, feedback, views and perception of project from local communities. Understanding, monitoring and assessing the project activities' environmental and social impacts and risks. Establishing relations with the local communities. Communicating and encouraging the use of Grievance Mechanism. Open forums where stakeholders will be able to receive information, ask questions, and provide feedback. These meetings will promote transparency and community involvement.	PAPs, project workers (including workers to be employed for the construction activities, RGY staff, contracted workers, etc.), vulnerable/disadvantaged groups/people.
Focus group discussions	Information sharing on a specific topic to a certain group of people including vulnerable/disadvantaged groups. Receiving comments, feedback, views and perception of project from a certain group. Collecting grievances and concerns related to the project from a certain group. Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders. Establishing relations with certain groups.	Stakeholder groups relevant to the information to be shared and discuss during the meeting, vulnerable/disadvantaged groups/individuals.
Website	Sharing project relevant information and update on progress.	Any stakeholder group identified throughout the project including affected communities and PAPs,

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Engagement Method	Application/Purpose of the Method	Target Stakeholder
	Disclosing project/subproject related documentation and communication tools: Environmental and Social Documents, presentations, brochures, etc. Announcements of key events (date/time, venue). The Company website (https://rgy.com.tr/) will provide relevant and up-to-date information regarding construction works and operational aspects. The Project NTS, and SEP, prepared as part of the environmental and social review package, will be made 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.	national and local media, academia, NGOs, businesses and organizations/agencies.
Digital communication tools, social media (Facebook, Twitter, Instagram accounts, WhatsApp groups), national/local television channels, radio stations, SMS, etc.	Non-technical information sharing and progress updates. Announcements of key events, dates and published documents related with the Project.	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organizations/agencies.
Project information brochures/leaflets	Sharing brief project information to provide regular update. Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, scope of project activities and subprojects, etc. Disseminating site-specific project information.	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organizations/agencies.
Grievance Mechanism (GM)	Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders.	Any stakeholder group identified throughout the project.

5.0   GRIEVANCE MECHANISM

5.1   External Grievance Mechanism

For the corporate-level, Company grievance mechanism will be implemented. The company is committed to processing any grievance received in a timely manner via a transparent, culturally appropriate procedure, at no cost, and without retribution for the party presenting the grievance. The company oversees the implementation of grievance management procedures in each operational area. In recognition of the differing activities of the

company and the involvement of various contractors, new projects and activities will adhere to the company's established grievance mechanism, which is based on existing, specific grievance management procedures.

For the specific projects, a project-specific external grievance mechanism will be established to enable external stakeholders to raise a grievance regarding the design or implementation of the Project. The objective of this grievance mechanism is to provide all stakeholders with the opportunity to obtain information about the project activities and facilities, submit their complaints and requests in a structured and formal manner, and receive prompt, fair, and effective responses.

In particular, members of the staff who have been nominated and trained will be responsible for recording any grievance information in a dedicated grievance log. The grievance log will contain the following information: The log will include the name and contact details of the stakeholder, as well as a detailed account of the grievance, including the date it was submitted, acknowledged, responded to, and closed.

Individuals may request that their names be kept confidential. This mechanism does not preclude the right of stakeholders to process grievances through other judicial means.

Comments or concerns may be submitted to the RGY in writing (by post or email) or by completing a grievance form. The grievance form will be made available on the RGY website, websites of each Mall, in the information desk of the Malls, and at the Mukhtar's office, along with a description of the grievance mechanism. Grievance forms can then be submitted to the designated contact points. All grievances will be addressed as follows:

■   Acknowledged within seven days after receipt; and

■   Responded no later than within 30 days after receipt.

The steps of the external grievance mechanism are as follows:

1)   Receipt of the grievance in writing (by post or email) or by completing a grievance form.

2)   Assessment of the grievance.

3)   Acknowledgement of grievance.

4)   Investigation and resolution of grievance by taking corrective actions

5)   Closure; and

6)   Reporting back to the grievance holder.

The grievance mechanism must be clearly communicated to the public through stakeholder meetings held for project-affected communities.

In particular, members of the staff who have been nominated and trained will be responsible for recording any grievance information in a dedicated grievance log. The grievance log will contain the following information: The log will include the name and contact details of the stakeholder, as well as a detailed account of the grievance, including the date it was submitted, acknowledged, responded to, and closed.

Individuals may prefer to apply anonymously. In the case of anonymous grievances, it does not preclude the right of stakeholders to process grievances through other judicial means, however, due to the nature of the anonymous application, the applicant will not be contacted on assessment and outcomes.

For complaints related to Gender-Based Violence and Harassment (GBVH), the grievance mechanism will follow strict confidentiality and sensitivity protocols. Trained personnel will handle such complaints to ensure the dignity, safety, and privacy of complainants, with additional measures such as secure, private reporting channels. GBVH grievances will be prioritized, with tailored support and counselling services offered, and only authorized personnel will have access to any related information. The mechanism will also include a non-retaliation policy, ensuring that no complainant faces repercussions for reporting. Multiple accessible reporting

options, such as hotlines, in-person meetings, and digital platforms, will be available to accommodate different needs. These steps ensure that all complainants feel safe and respected throughout the process.

5.2   Internal Grievance Mechanism

RGY has formal employee grievance mechanisms in place. The following relevant practices are implemented within the company:

■ The Internal Audit Department oversees the ethics declaration process, which is designed to ensure compliance with the company's ethical standards that presented at the Regulation on Business Ethics and Code of Conduct Document. Ethics declarations may be submitted via an ethics hotline (0850 400 85 85), email (ethics@ronesans.com), or online form (ethics.ronesans.com). An Ethics Evaluation Procedure has been put in place for this purpose. The Internal Audit Department records and assesses all grievances received through these channels. If a grievance is of an ethical nature, the ethics committee will evaluate it and take appropriate action. If the issue is related to another department, it will be forwarded to that department in accordance with standard procedure. Contractors are also able to use the ethics hotline and the online form.

■ As outlined below, employees may submit suggestions and grievances during "Employee Committee" meetings.

■ If an employee wishes to discuss a grievance, they may speak with their manager or the Community Liaison Officer (CLO)/relevant personnel.

■ Employees may submit suggestions via the company's suggestion system. Complaints are received via one-on-one meetings, petitions, telephone calls, and collective meetings. Once the relevant individual has evaluated the complaint, the decision will be shared with the complainant, and the complaint will be marked as closed.

RGY is committed to fostering a positive work environment based on open and continuous communication. The internal grievance mechanism for employees operates with the following tools:

Employee Committees:

The Employee Committee is comprised of employee representatives, HR personnel, and management. Its responsibilities include the review of employee grievances and the identification of action plans, which may include elevating the issues to the attention of upper management. This platform facilitates a free flow of information between the company and its employees through the involvement of both employer and employee representatives. Issues pertaining to employees, including problems and suggestions, are discussed to ascertain whether there are suitable solutions or actions that the company can implement. Topics covered are mostly on;

■ HSE

■ Working conditions (locker rooms, rest areas, heating, air conditioning, etc.)

■ Security, meal, and transportation services

■ Training and development

■ Camp Conditions (in related locations)

Employee Committees convene on a monthly basis at both the headquarters and regional levels. The membership is comprised primarily of operational and maintenance managers, HS&E personnel, HR business partners, administrative and social affairs managers, and select employee representatives from departments and locations. Meeting minutes are duly recorded and disseminated to employees via various communication

channels, including email and notice boards, and action items are tracked and addressed in subsequent meetings.

Ethical Notifications:

To guarantee that any potential issues pertaining to the RGY Code of Ethics are brought to light, the RGY Ethics Hotline 0850 400 85 85) is active and available for use. The Code of Ethics and the Hot Line are disseminated company-wide. The Internal Audit Directorate is the sole entity with access to notifications made via the Hot Line. The Internal Audit department is responsible for conducting further investigations into notifications, following the guidance set out in the Ethics Investigation Procedure, and reporting the findings. The results of the investigation and any recommendations are presented to the Workplace Behavior Evaluation Committee, which then decides on the appropriate course of action.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-impacted people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

6.0   MONITORING AND REPORTING

6.1   Monitoring Activities and Key Performance Indicators

The stakeholder engagement process is subject to periodic monitoring. Based on the monitoring outputs, the SEP will be updated and the necessary corrective actions will be implemented at the various stages of the project.

Monitoring stakeholder engagement is crucial for ensuring effective decision-making, identifying and addressing issues early, measuring the effectiveness of engagement activities, and enhancing transparency and accountability. Each project-specific SEP will include a timeline for engagement activities, as well as a definition of the responsible parties for the implementation and monitoring activities. Monitoring of engagement activities can be achieved by identifying key performance indicators (KPIs) that reflect the objectives of the corporate SEP and the specific tasks and actions.

The monitoring activities to be followed in a SEP are presented in Table 5.

Table 5: Monitoring Activities

Monitoring	Frequency	Responsible Team	Key Performance Indicators (KPIs)
Stakeholder engagement and stakeholder feedback	Monthly	CLOs or relevant personnel	Number of meetings and feedback items according to: Type of stakeholder group Engagement method Meeting locations
Grievance mechanism	Quarterly	CLOs or relevant personnel	Number of grievances logged and resolved: Settlement Subject Company (Contractor or Subcontractors)

Monitoring	Frequency	Responsible Team	Key Performance Indicators (KPIs)
			Related department within the Company, Contractor or Subcontractor Response timeframe Resolution timeframe Status of grievance/feedback
Reporting of engagement activities	Bi-annually	CLOs or relevant personnel	Percentage of engagement activities completed
SEP Update	Annually	CLOs or relevant personnel	Number of updates made to SEP

The SEP should be reviewed and updated based on monitoring data, with necessary corrective actions implemented promptly. Additionally, it is important to clearly define the responsibilities for monitoring and reporting activities to ensure accountability and consistency throughout the project. By following these steps, the stakeholder engagement process can be effectively monitored and continuously improved.

While monitoring is the ongoing process of systematically tracking and evaluating the progress and effectiveness of activities, KPIs are specific, measurable indicators used within the monitoring process to assess performance against defined objectives. A detailed KPIs list for a SEP is presented in Table 6.

Table 6: Key Performance Indicators (KPIs)

ID	KPI	Target	Monitoring Measure
Consultation and Information Disclosure			
SEP-KPI-01	Registration of stakeholder engagement	Target of 100%	Database
SEP-KPI-02	Consultation records Materials shared with the stakeholders (brochure, presentations) Number of the meetings held Number of the participants who attended the public consultation meetings Visits to local authorities or other local stakeholders Frequency of the visits to the settlements affected by the Project Any updates on the Project website and social media. Any type of announcements (information banners, calls) Update of SEP and re-visiting stakeholder list	Annual. Delivery of annual reports on the consultation activities	Reporting
Implementation of Grievance Mechanism			
SEP-KPI-03	Number of community complaints/ grievances received	The total number reduced per year	Log/Database
SEP-KPI-04	Number of complaints/grievances responded in a designated duration	The target of 90%	Log/Database

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ID	KPI	Target	Monitoring Measure
SEP-KPI-05	Reporting back to stakeholders in the implementation of the grievance mechanism	Delivery of regular reports to stakeholders on the outcomes of the Grievance Procedure	Reporting
SEP-KPI-06	Auditing the grievance mechanism to ensure that it is being implemented and that grievances are being adequately addressed	Annual. Target of 100% of grievances closed out to the satisfaction of complainant within the designated duration	Audit report

Quarterly summaries of grievances will be prepared for all grievances raised by internal and external stakeholders, as well as the implementation status of corrective/preventive actions, consultations, and disclosure activities by the relevant personnel. In addition, SEP monitoring and evaluation reports will be submitted to the EBRD on a periodic basis as per annual reporting requirements. The Company will issue an annual report on its environmental and social performance, including a summary of any grievances raised and the manner in which they have been resolved. To keep external stakeholders informed, the Annual Environmental and Social Report will be published. This will include an overview of the Annual Environmental and Stakeholder Engagement activities, ensuring that commitments made to stakeholders are delivered in a transparent and accountable manner.

It should be noted that documentation will be committed and is important because it ensures transparency, accountability, and continuity throughout the project lifecycle. By systematically recording decisions, actions, and stakeholder interactions, documentation provides a clear and accessible reference that can be used to track progress, resolve disputes, and inform future projects. It also helps in maintaining compliance with legal and regulatory requirements and supports effective communication among team members and stakeholders. Ultimately, thorough documentation fosters trust and confidence in the project's management and outcomes, contributing to its overall success.

6.2 Reporting

A SEP should be a living document, usually updated on an annual basis and when there is a change in the project:

- At least once a year, the SEP should undergo a thorough review to assess the effectiveness of the engagement strategies and identify any new stakeholders or changes in stakeholder interests and influence.

- If there are significant changes in the project scope, such as new phases, expansions, or reductions, the SEP should be updated to reflect these changes and their impact on stakeholders.

- Detailed records of all updates and changes made to the SEP should be kept. This documentation provides a clear history of the engagement process and helps in maintaining transparency and accountability.

- Stakeholder engagement activities can be presented in tabular format, listing the tasks undertaken, the time of action, the responsible party, the target group, and the purpose of the action.

In terms of reporting back to the communities, this is a crucial aspect of maintaining transparency and trust in the stakeholder engagement process:

- RGY should maintain a record of commitments made (commitments tracker) and provide regular updates on progress made against these commitments.

- Regular community meetings to provide updates on Project progress, address concerns, and gather feedback should be conducted by the responsible person such as project CLO for stakeholder engagement.

- Websites of each Mall where community members can access up-to-date information about the Malls, view reports, and submit their feedback or concerns should be utilized.

- Annual reports that detail the most recent information regarding the Malls, stakeholder engagement activities, and how community feedback has been addressed can be prepared and published. These reports should be made available to all stakeholders. This report will then be used as the basis for updated information to be delivered and included in the yearly sustainability report. RGY will be responsible for providing semi-annual progress reports to lenders. Sub-project-specific progress reports will also include a section on stakeholder engagement activities conducted and disaggregated data about grievances during the specified period.

To ensure effective monitoring and communication, the following reporting schedule will be implemented.

Table 7: Reporting Time Frame

Reporting Type	Frequency	For	Content
Reporting on grievance mechanism	Quarterly	Project management	Detailed records of number and type of the grievances received timeline for the resolution of each grievance
Reporting on stakeholder engagement	Bi-annually	Project management	Statistics of the records of the activities, number of participants attended to the meetings, number and type of the grievances raised per settlement, timeline for the resolution of each grievance
Reporting on Performance	Annually	Project management	Summarising progress against determined KPIs
Reporting back to stakeholders	As needed	Stakeholders	Updates on project progress, resolution of grievances, and outcomes of engagement activities

7.0   ROLES AND RESPONSIBILITIES

The SEP will include a detailed section outlining the roles and responsibilities of the team members involved in its implementation. This section will specify the duties of each team member, ensuring clarity and accountability. Responsibilities will encompass planning and conducting engagement activities, managing the grievance mechanism, and maintaining regular communication with stakeholders.

Additionally, each Mall must have a CLO responsible for managing stakeholder engagement activities and overseeing the grievance mechanism. The CLO will ensure effective communication with stakeholders, address concerns, and facilitate the resolution of grievances in a timely and transparent manner. As underlined by IFC Tool Kit (IFC, 2022) and EBRD Guidance Note (EBRD, 2012), appointing a CLO who is from the community, or works closely with the community, will help to identify strategies to overcome these power differentials when designing and delivering activities with the community.

By clearly defining these roles, the SEP will facilitate effective coordination and execution of stakeholder engagement.

8.0   LIABILITIES

A dedicated team will be assigned for the implementation of the SEP that includes engagement activities and the grievance mechanism management. The SEP will provide project-specific contact information of the relevant personnel, ensuring stakeholders know who to reach out to for specific concerns or information. Corporate level contact information for the stakeholders is presented below:

Company website: https://rgy.com.tr/

e-mail: info@rgy.com.tr

For the grievances and the requests related with the Project please contact: Dilşad Leblebici, Marketing Manager, dilsad.leblebici@ronesans.com