

Dumlupınar Sağlık Hizmetleri A.Ş.
(Dumlupınar/ SPV)

Kütahya Health Campus Project

STAKEHOLDER ENGAGEMENT PLAN
(DUM-ESMS-SEP-001)

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TABLE OF CONTENTS

DISCLAIMER	2
TABLE OF CONTENTS	3
DEFINITIONS	4
ABBREVIATIONS	5
1 INTRODUCTION	6
1.1. Purpose	6
1.2. Scope and Application	6
2. ABOUT THE PROJECT	7
3. LEGAL REGULATIONS AND REQUIREMENTS	9
3.1. National Regulation	9
3.2. International Requirements	10
4. ORGANIZATIONAL STRUCTURE, TASK AND RESPONSIBILITIES	10
4.1. Task and Responsibilities	10
4.1.1 SPV Management	10
4.1.2 EPC Management	11
4.1.3 OHSE Chief	11
4.1.4 Environmental Engineer	11
4.1.5 HR & Personnel Chief	12
4.1.6 All Internal / External Stakeholders	12
5. METHODS AND TOOLS	12
5.1. Fundamental Principles	12
5.2. Determining Stakeholders	13
5.3. Stakeholder Engagement Tools	13
6. STAKEHOLDER ENGAGEMENT PROGRAM	14
6.1. Pre-construction Scoping and Impact Assessment	14
6.2. Construction Period Stakeholder Engagement	15
6.3. Future Stakeholder Engagement	16
6.4. Engagement Program	16
7. SUGGESTION-RECOMMENDATION- COMPLAINT MECHANISM	17
8. MONITORING	18
8.1. Basic Monitoring Activities	18
8.2. Key Performance Indicators	19
9. AUDIT, REPORTING AND RECORD KEEPING	19
9.1. Audit	19
9.2. Reporting	19
9.3. Record Keeping	20
ANNEXES	
ANNEX- 1 Project Stakeholders List	21
ANNEX- 2 Suggestion, Recommendation, Complaint Notification Form	25
ANNEX- 3 Project Contact Info	26

DEFINITIONS

Administration:	T.R. Ministry of Health
Consultant:	Service providers who give its knowledge and experience for benefit of the Administration and who have no organic connection with the contractors of the works where consultancy is made, who obtain no gain from the administration except consultancy service fee and who provide consultancy service (ÜÇER- OPTİMAL Business Partnership)
The Project Company (SPV):	Dumlupınar Sağlık Hizmetleri A.Ş. (GÜRIŞ's subsidiary)
The Project:	Kütahya Health Premises Project (including General Hospital and Physical Treatment and Rehabilitation Hospital) is performed by SPV or its subsidiaries.
Engineering, Procurement and Construction Contractor (EPC)	GÜRIŞ İnşaat ve Mühendislik A.Ş.
Field Management :	All key management roles taking place in work site management (mainly EPC Contractor's personnel)
Environment and Social Management System (ÇSYS) :	Full document set developed for considering, managing, monitoring, auditing and reviewing environmental, social, health and security aspects of the project (including but not limited to policies, guidelines, plans, procedures, working instructions and records).
Construction site :	Includes all areas where construction operations are performed.
Environment and Social Management Plans (ÇSYP):	Performing special management methods, impact mitigation measures, monitoring activities, reporting, auditing and reviewing, plans published by SPV regarding important Environmental and Social aspects (as defined in ÇSDT).
Stakeholder (internal/ external) :	These are people or groups that will directly be affected from the project and/or that can have benefit from the project and that will directly be affected from the project results. (IFC, 2007)
Project Engagement :	It is a process covering whole lifetime of the project among the company operating the project and its stakeholders and which is wider, comprehensive and sustainable one (IFC, 2007)
Stakeholder Engagement Plan :	All activities (notification, communication/negotiation, organization etc.) that should be performed to ensure feedback and to notify recommendation, opinion, request, concern and complaints about any project activity or the project, with regard to project risks for the ones who are affected from the project during the project.
Sensitive Groups :	These are people who can be affected more negatively from the project activities due to their gender, ethnic root, age, physical or mental disorders, economic status or social status and who have limited ability to have benefit from project opportunities.
Recommendation/ Request/ Complaint :	It is feedback made by natural persons (individual, a community or groups) and/or legal persons (organizations, institutions) who are affected by the project activities and/or behaviours.
Recommendation/ Request/ Complaint Mechanism :	It is an official path ensuring a clear and transparent frame for considering, evaluating and solving recommendations, requests or complaints of the stakeholders with regard to the company's performance or behaviour.
Scope Determination :	It is a process of determining content and level of subjects to take into consideration in current status work and ÇSD. Scope determination process varies based on specific characteristics of the project and capacity of authorities, legal requirement and how surrounding communities are close.
Cultural Heritage :	It is set of values belonging to a society with all kinds of work of art created by human and existed physically or spiritually, desired to be left as a heritage for the future for different reasons and remained from the past.

ABBREVIATIONS

AIIB	Asian Infrastructure Development Bank (AIIB)
EU	European Union
EPRP	Emergency Preparedness and Response Plan
EBRD	European Bank for Reconstruction and Development
KPI	Key Performance Indicators
PCC	T.R. Presidential Communication Centre ("ALO 150")
EIA	Environmental Impact Assessment
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
EHS	Environmental Health and Safety
MLSS	Ministry of Labour and Social Security
ESHS	Environmental and Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
MEU	Ministry of Environment and Urbanisation
EP	Equator Principles
GOLDER	Golder Associates Türkiye Ltd. Şti.
GÜRIŞ	Güriş Holding A.Ş.
PRO	Public Relations Officer
OHSE	Occupational Health, Safety and Environment
KHPP	Kütahya Health Premises Project
MOTT	Mott Macdonalt
PR	Performance Requirement (issued by EBRD)
SEP	Stakeholder Engagement Plan
PPP	Public Private Partnership (PPP)
PS	Performance Standard (published by IFC)
MHCC	Ministry of Health Communication Centre ("ALO 184")
MH	T.R. Ministry of Health
HMPCC	Health Meeting Point Communication Centre ("ALO 182")
NGO	Non-Governmental Organisations
OPTIMAL	Optimal Proje Yönetimi A.Ş.
SPC	Special Purpose Company (Dumlupınar Sağlık Hizmetleri A.Ş.) (SPV)
CMP	Complaints Mechanism Procedure
IFC	International Finance Corporation / (IFC)

IGIP	International Good Industry Practices
ÜÇER	Üçer Müşavir Mühendislik A.Ş.
WHO	World Health Organisation

1 INTRODUCTION

This plan have been prepared for “Kütahya Health Premises Project” in accordance with EBRD Performance Requirements, IFC General and Sector Specific EHS Guidelines, Equator Principles 3, IFC Performance Standards (Especially PS1), national legal regulations, Dumlupınar A.Ş. and indirectly GÜRİŞ policies and guarantees.

1.1 PURPOSE

GÜRİŞ adopted a stakeholder engagement approach based on opinions and concerns of stakeholders and environmental and social subjects that can cause a risk for all stakeholders who are directly and/or indirectly related with the project before, during and after the project activities.

The purpose of Stakeholder Engagement Plan prepared in line with this approach, are as follows;

- Determination of tasks and responsibilities with all requirements and resources (monitoring activities, education, communication and contact, financial, machine-equipment, facility, etc.) for practicing, monitoring and maintaining stakeholder engagement plan prepared in accordance with GÜRİŞ stakeholder engagement approach principles,
- Determining positive/negative environmental and social effects of the projects and defining effect mitigation measures complying with the Project standards (applicable, effective and productive),
- Determining activities for stakeholders who will be affected from the project and benefits of stakeholders,
- Including all stakeholders in processes, ensuring in time and better understanding of engagement approach of GÜRİŞ by stakeholders,
- Ensuring that stakeholders are informed with regard to all Project activities during lifetime of the project in a manner not technical and easy to understand.
- Creating a complaint mechanism for considering opinions, recommendations, requests, complaints and concerns,
- Ensuring that stakeholder express their opinions, recommendations, complaints and concerns and that they access to information with regard to environmental and social effects of the project, impact mitigation measures and construction activities in time and from first hand,

Thus, creating an engagement system for establishing long-term, positive, strong and sustainable relations that will ensure benefit for all parties and that is based on mutual trust and transparency, clear, objective, constructive in between GÜRİŞ and all stakeholders.

1.2 SCOPE and APPLICATION

Stakeholder Engagement Plan covers all activities for following premises and their surroundings (including Sub-Contractors) before and during construction and during commencement stages, which take place within the scope of Kütahya Health Premises Project (KHPP);

- Central General Hospital and
- Yoncalı FTR

Considerations in that stage for operation period will separately be evaluated and this plan will be revised in a manner including activities of stakeholder engagement with regard to operation period, and it will be practised.

This SEP includes the project and stage details, its environmental and social effects, stakeholder engagement approach, principles and methods, monitoring, assessment, reporting and recording stakeholder engagement.

2 ABOUT THE PROJECT

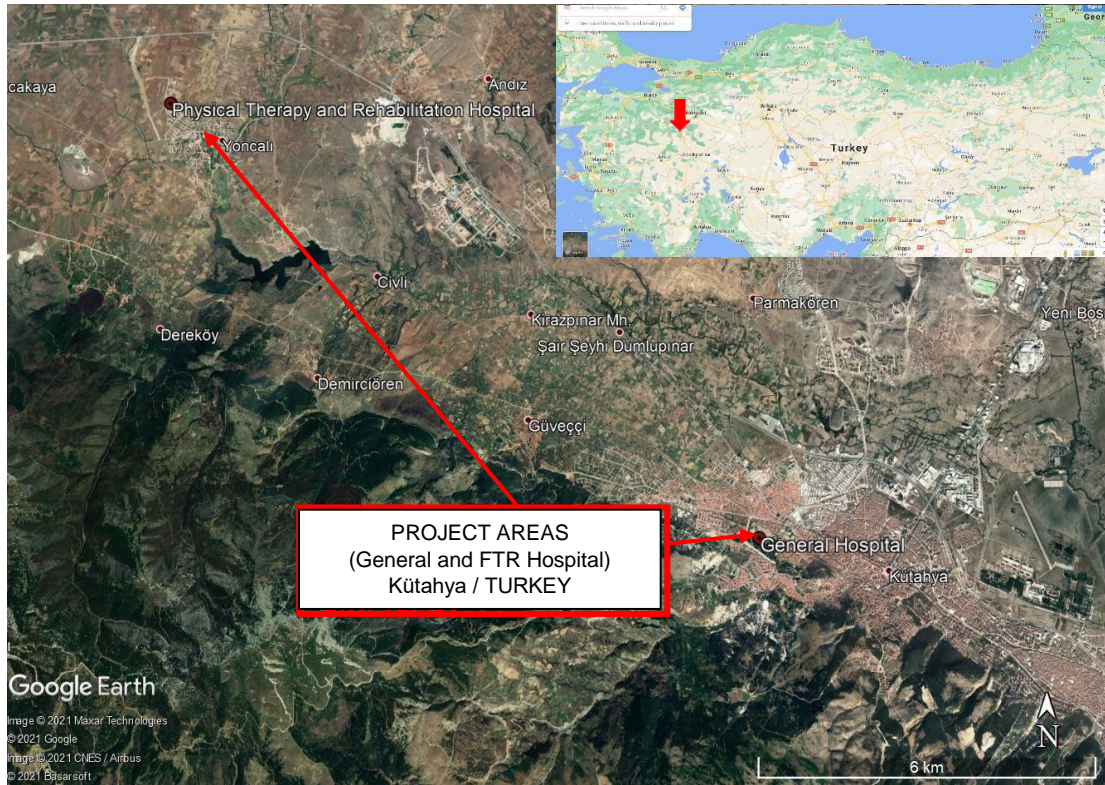
Ministry of Health (administration) developed a health network modernization vision with the purpose of developing and generalizing medical education, research and service presentation in line with changing requests and trends in health service presentation and education and planned to realize its vision of creating modern and active health infrastructure in Turkey with its Public-Private Cooperation program.

With this purpose, in order to make finance, design and construction works for constructing Kütahya Health Premises and ensuring specific services and operating commercial areas, GÜRIŞ entered into the tender within the scope of "Practice Regulation Regarding Establishment of Public-Private Cooperation Model by Ministry of Health, Renewing and Commencing (Official Gazette dated 09.05.201 and numbered 28995) and presented the most suitable offer for the tender.

In between the Project Company (DUMLUPNAR Sağlık Hizmetleri A.Ş.) and Special Purposed Company (SPC) established by Kütahya Health Premises Project (KHPP); Ministry of Health (MH) and Gürış İnş. ve Müh. A.Ş., "The Contract for Construction Works of Kütahya Health Premises with Public-Private Cooperation (PPC) Model and Supplying Products and Services" was concluded on 29.09.2016. . .

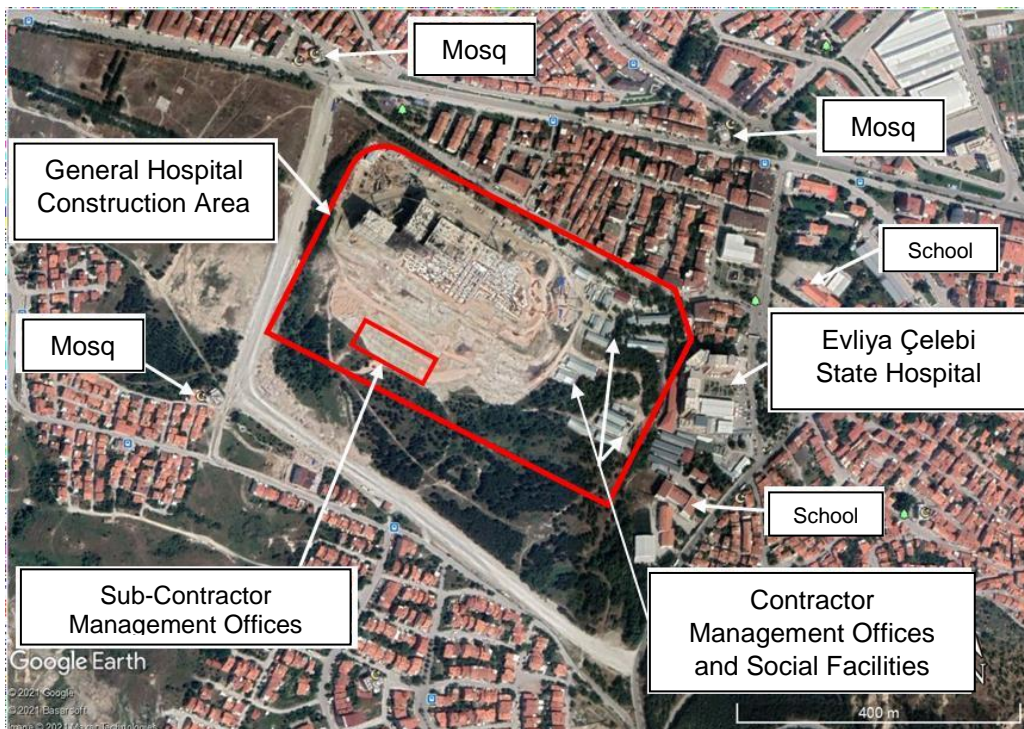
An agreement has been reached by the Project Company by applying to international credit institutions and required source was obtained to finance the project and the project is operated. This situation requires compliance of the project with international credit requirements and standards.

Kütahya Health Premises Project takes place in Kütahya Province, Central District, Evliya Çelebi Neighbourhood (General Hospital) and Yoncalı Neighbourhood (Physical Therapy and Rehabilitation Hospital). (Picture– 1)



Picture - 1: Kütahya Health Premises Project Locations

Around General Hospital premises, there are mainly houses, education facilities, health facilities, commercial businesses (pharmacy, supermarket, etc.) mosques and recreation areas. The closest settlements are Evliya Çelebi neighbourhood in approximately 40-50 m at north of Project site, Okmeydanı neighbourhood in approximately 250m at south and Gültepe neighbourhood in approximately 650 m distance at south east. (Picture -2)



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Picture - 2: General Hospital Premises and its Surrounding View

Physical Therapy and Rehabilitation Hospital (PTRH) is located in Yoncalı Neighbourhood in approximately 16 km to Kütahya centrum. PTRH premises are mostly surrounded by empty lands. In addition, there are a few tourism premises close (approximately at 100 m north of the project site, 150 ö south east and 300 m south east) and a housing complex (at approximately 90 west of the project site (Picture-3).



Picture - 3: General Hospital Premises and its Surrounding View

There will be many specialized branches, research /development laboratories, centres, social facilities, commercial areas and places within Kütahya Health Premises. Scope of the project was explained in following table with relevant numeric data (Table -1).

Table -1 : Details regarding KHPP

CAPACITY	GENERAL HOSPITAL	PHYSICAL THERAPY AND REHABILITATION
LAND AREA	149.926,76 m ²	31.289 m ²
CLOSE CONSTRUCTION ARA	143.138,83 m ²	38.939,63 m ²
OPERATION PERIOD	25 years	25 years
TOTAL NUMBER OF BEDS	510	100
NUMBER OF SINGLE ROOMS	159	32
NUMBER OF DOUBLE ROOMS	136	36
NUMBER OF POLYCLINIC ROOMS	193	20
NUMBER OF PARKING AREAS	584 Outdoor, 476 Indoor	59 Outdoor, 41 Indoor
NUMBER OF SERVICE PERSONNEL (ESTIMATED)	910	170
NUMBER OF MINISTRY OF HEALTH PERSONNEL (ESTIMATED)	1470	230

3 LEGAL FRAME AND REFERENCE DOCUMENTS

This section includes good practices and national/international legal regulations, standards and reference requirements applicable (their forms in force and applicable ones for the project) in order to practice this plan in construction stage.

3.1 National Regulation

GÜRİŞ requested assessment of Kütahya Health Premises Project's Environmental Impact Assessment within the scope of the Regulation on 11.09.2018 from T.R. Governorship of Kütahya, Provincial Directorates for Environment and Urbanization. Since the project does not take place in Annex- I "Environmental Impact Assessment (EIA) Project List" and Annex II "List of Projects for Selection and Screening Criteria" of Environmental Impact Assessment Regulation entered into force by being published on Official Gazetted dated 25.11.2014 and numbered 29186, it was assessed out of the scope of EIA Regulation and it was considered that there is no need to perform "Environmental Impact Assessment".

In addition, the provisions/requirements of the relevant legislation (including, but not limited to, as applicable) set out below will be complied with at each stage of the Project activities.

- Constitution of the Republic of Turkey
- Turkish Civil Code
- Right to Information Act
- Law on the Exercise of the Right to Petition
- Labour Law
- Environment Law
- Personal Data Protection Law
- Environmental Impact Assessment Regulation

3.2 International Requirements

Table -2: National Requirements

Resource	Document heading
Equator Principles Association	Equator Principles, June 2013
Uluslararası Finans A.Ş.	IFC Performance Standards (PS) and Guidance Notes GN
Uluslararası Finans A.Ş.	IFC PS 1 and GN 1 Management of Environmental and Social Risk and Impact Assessment
Uluslararası Finans A.Ş.	IFC PS 2 and GN 2 Work and Working Conditions
Uluslararası Finans A.Ş.	IFC PS 4 and GN 4 Community Health, Safety and Security
Uluslararası Finans A.Ş.	IFC PS 5 and GN 5 Land Acquisition and Compulsory Resettlement
Uluslararası Finans A.Ş.	IFC PS 8 and GN 8 Cultural Heritage
Asian Infrastructure Investment Bank	AiIB ESS 1 - Environmental and Social Assessment Management
Asian Infrastructure Investment Bank	AiIB ESS 2 - Involuntary Resettlement
Asian Infrastructure Investment Bank	AiIB ESS 3 - Indigenous Peoples
European Bank for Reconstruction and Development	EBRD PR 1 - Assessing and Managing Environmental and Social Risks and Impacts
European Bank for Reconstruction and Development	EBRD PR 2 - Labour and Working Conditions
European Bank for Reconstruction and Development	EBRD PR 4 - Health, Safety and Security

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Resource	Document heading
European Bank for Reconstruction and Development	EBRD PR 5 - Land Acquisition, Land Use Restrictions and Involuntary Resettlement
European Bank for Reconstruction and Development	EBRD PR 8 - Cultural Heritage
European Bank for Reconstruction and Development	EBRD PR 10 - Information Sharing and Stakeholder Engagement
International Standardisation Organisation	ISO 14001: 2015 - Environmental Management Systems
International Standardisation Organisation	ISO 45001: 2018 - Occupational Health and Safety Management Systems

4 ORGANIZATIONAL STRUCTURE, DUTIES AND RESPONSIBILITIES

4.1 Duties and Responsibilities

The main duties and responsibilities regarding the implementation of this plan are as follows.

4.1.1 SPV Management

SPV Management is responsible of followings and practising this Stakeholder Engagement Plan during project lifetime and guarantees application of this plan for practicing all actions required regarding environmental and social effects sourced from activities of EPC Contractor within the scope of KSYP and practicing all required measures and monitoring activities;

- Making that EPC Contractors prepares and approves “Suggestion/ Recommendation/Complaint Mechanism” and a final “Stakeholder Engagement Plan” by considering scope of the Project and its environmental and social effects,
- Checking that the Stakeholder Engagement Plan is up to date / appropriate according to the project activities and changing conditions,
- Proposing changes/updates for Stakeholder Engagement Plan to EPC Contractor when necessary,
- Controlling whether all resources are provided and assigned required/ sufficient/ qualified by EPC Contractor (machine, equipment, finance, infrastructure, facility, personnel, etc.) for applying Stakeholder Engagement Plan,
- Controlling and tracking whether feedback is provided as soon as possible within the scope of applicability and opportunities by considering transparency, fairness, objectivity and confidentiality for opinions, recommendations, requests and/or complaints coming from all internal/ external stakeholders, whether suitable and required actions are realized and hence whether Stakeholder Engagement Plan is practiced in an efficient and consistent manner,

4.1.2 EPC Management

EPC Contractor will be responsible of followings within the scope of KHPP construction;

- Determining policies and objectives related to environmental and social communication and stakeholder engagement,
- Preparing a “Stakeholder Engagement Plan” by taking project characteristics, determined policies and targets, scope of the activities, their environmental and social effects and all internal / external stakeholders who will be affected from these,
- Supplying and assigning all resources required / sufficient / qualified (machine, equipment, facility, labour, finance, etc.) fore practicing and managing Stakeholder Engagement Plan during lifetime of the project in an effective and consistent manner,
- Providing full support to subordinates for effective and continuous practice of the plan and ensuring necessary coordination with the parties,

- Providing monitoring data for the Plan and activity and performance reports to SPV on a six (6) monthly basis.

4.1.3 OHSE Chief

OHSE Chief is responsible of followings;

- Determination and follow-up of national and international legislation, guidelines and requirements applicable to project activities,
- Identification of actions and mitigation measures to eliminate potential environmental and social suffering arising from OHSE hazards,
- Auditing performance according to all provisions in the Contractor's contracts regarding environmental, social and OHS requirements according to project standards during construction phase,
- Providing response to OHS, environmental and social complaints expressed within the scope of task, authority and responsibilities by local communities and local organizations,
- Determining and preparing necessary training materials for employees

4.1.4 Environmental Engineer

Environmental Engineer is responsible of followings;

- Monitoring and recording environmental effects of the Project and its performance in this respect,
- Assisting PRO in evaluation of opinions, suggestions, requests or complaints received from stakeholders regarding environmental impacts,
- Participating in all formal and informal environmental impact stakeholder engagement activities, identifying and implementing corrective measures if necessary,

4.1.5 HR & Personnel Chief (Public Relations Officer)

In order to ensure regular communication with stakeholders and management of environmental and social management activities of the Project, HT & and Personnel Chief, Public Relations Officer (PRO) were appointed. HR Chief is responsible of followings;

- Practicing and organizing engagement activities described in this plan,
- Keeping records for the activities by establishing communication and relations with all official and non-official participations with local communities,
- Monitoring and recording social responsibility activities carried out within the scope of the project,
- Organizing stakeholder meetings for realizing active meetings as required by opinion, recommendation, request and complaints and making regular notifications to stakeholders in this regard,
- Making research for opinion, recommendation, request and complaint resources (resulted environmental and social events) and taking required actions for solving conflicts in between the project and stakeholders,
- Proposing amendments and/or updates to this plan and making revisions if necessary,
- Identifying corrective actions to be implemented and recommending them to the Management on an “as required” basis or at periodic meetings,
- Monitoring and recording social responsibility activities carried out within the scope of the project

4.1.6 All Internal / External (Contractor / Subcontractor employees, Suppliers, Visitors, etc.) Stakeholders

In order to duly practice requirements of Stakeholder Engagement Plan, all (internal/ external) stakeholders who are affected from the activities within the scope of KHPP, are responsible of complying with all types of procedures and instructions within the scope of this plan and other procedures and instructions prepared with

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regard to stakeholder engagement program and process determined and announced by EPC Contractor (GÜRIŞ).

5. METHOD AND TOOLS

5.1 Fundamental Principles

During implementation of this Plan, following principles will be followed to ensure effective stakeholder engagement.

- **Transparency:** Consultations with stakeholders will be realized during lifetime of the project in an open manner, without manipulation, intervention, pressure, discrimination and menace.
- **Objectivity:** A fair and equal complaints procedure will be applied to every complaint or concern submitted by an individual or the public. All stakeholders will have equal access to information.
- **Confidentiality:** Complaints can be submitted anonymously (confidentially) and will be resolved.
- **Accessibility:** It will be ensured that all stakeholders can easily report all kinds of opinions, suggestions and complaints without any restrictions and obstacles.
- **Cultural compliance:** All opinions, suggestions and/or complaints expressed or a problem will be assessed and resolved within the framework of regional concerns and cultural relevance.
- **Notification and feedback:** The project's effects and benefits, relevant environmental and social dimensions, opinions, recommendations and complaints will be notified to stakeholders correctly, within a reasonable period, in an updated and understandable manner.
- **Ensuring engagement:** Opportunities will be prepared for stakeholders to express their opinions and concerns, there will be a seeking for a wider stakeholder support for the project and its effect management. Project engagement process is inclusive. All stakeholders will be encouraged to engage in consultation process to the extent possible under current circumstances.
- **Understanding and sensitivity:** In order to understand concerns and priorities of stakeholders, it will be sensitive against their needs, special attention will be paid to cultural sensitivities of various ethnic groups and vulnerable groups such as women, young, elder, handicapped, economically needy ones.

5.2 Identification of Stakeholders

Identification of stakeholders is a continuous process. All organizations and institutions that can directly or indirectly affected from the project and that can have effect on the project according to below determined categories, have been determined according to monitoring and assessments performed within the period from project planning to now and a stakeholder list has been prepared. (See Annex 1) This list will be updated in case of possible changes in the needs of existing stakeholders and/or identification of new stakeholders during lifetime of the project.

- National, regional and local public institutions and organisations;
- Multinational and international organisations,
- Active non-commercial, non-governmental organisations (NGOs) at international, national, regional and local level, particularly on environmental and social issues,
- Interest groups such as universities, university foundations, co-operatives, local businesses, business associations, chambers of commerce, etc,
- Unorganised Vulnerable Project Affected Persons with specific interests or who may be considered vulnerable (elderly, handicapped persons, ethnic minorities, landowners, women, children and communal land users, etc.),
- Project employees,
- Subcontractors and suppliers,
- Local and National Media,
- Local community and public (people living near the project area, investors, visitors, etc.)

5.3 Stakeholder Engagement Tools

In order to reach all stakeholders within the scope of the project and ensuring stakeholder engagement, various different tools and methods have been used, are used and will be used in a manner suitable with cultural structure, on different stakeholder groups. These communication tools are explained in more detail below and their detailed information is given in Annex 3.

- **Public General Meetings:** Through these meetings, stakeholders will be informed about the project and comments and questions received from stakeholders will be included in decision-making process.
- **Stakeholder Representative Meetings:** Smaller meetings will be organized for community members representing relevant stakeholders (mukhtars, NGO representatives). This activity allows focussing on specific issues and possibly finding agreed solutions between the parties.
- **Correspondences:** Official corresponding procedures will be used with Stakeholders for documentation within the frame of official permit requirements in construction, operation and discharging stages.
- **Media Announcements:** Important information about the Project will be provided through newspaper, radio, television announcements as appropriate.
- **Corporate Website:** A website ("www.dumlupinarsaglik.com") was created for the project and made accessible. The corporate website will include project documents, reports and contact information for those who want more information.
- **Direct Telephone Line:** There will be a direct telephone line for stakeholders in case of opinions, recommendations, complaints, etc., for 7/24 access to the company
- **Suggestion / Complaint / Recommendation Mechanism:** Receiving and resolving complaints will be one of the most important methods to be used during the project. All stakeholders will be promoted to use this mechanism to deliver their possible opinions, recommendations and complaints.
- **Project Brochures:** It will be used as a communication tool to introduce the project to stakeholders. In the project brochure, there will be general information with regard to project process and also more information and contact information for the ones who want to use suggestion/ complaint/ recommendation mechanism.
- **Education Programmes:** In order to practice prepared Stakeholder Engagement Plan in line with adopted engagement approach principles and o reach desired target, it is expected that all stakeholders act in a system and coordination. With this purpose, in order to ensure that this engagement approach is understood by stakeholders, to increase awareness, to introduce path, method and tools of engagement, education programmes will be organised according to the needs and expectations of project employees and groups that may be affected by possible project impacts.

With the purpose of ensuring effective and sufficient engagement during project in terms of stakeholder engagement, in case of need, new and special communication mechanisms will be developed and added to current communication mechanisms.

6. STAKEHOLDER ENGAGEMENT PROGRAM

The main objective of the Programme is to maintain ongoing positive community relations and to ensure that all relevant Stakeholders/parties are informed about all Project activities during the entire Project lifetime.

Stakeholder engagement program was prepared based on the project planning and practice stages and mentioned stages are defined below. Activities taking place within the scope of stakeholder engagement program, have been performed / are performed and will be performed according to different intensity level of these stages.

1. Stage: Pre-Construction Project Design (completed)
2. Stage: Construction Process (current activities)
3. Stage: Operation (future activities)

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4. Stage: Decommissioning and Closure (future operations)

6.1 Pre-construction Scope Determination and Impact Assessment

Prior to ESIA process, environmental impact assessment studies were carried out within the scope of local EIA regulation. Verbal and written correspondences were made with national and regional public organizations in these studies. Opinions of these organizations with regard to the project were taken. The Project is exempted from EIA Regulation processes and it is not deemed necessary to hold public information meetings as a part of EIA process.

According to analyses and assessments performed during design stage and practice, possible potential environmental and social effects of the project were defined. These effects were explained below under basic titles (including but not limited to these ones).

- Impacts on land use and livelihoods,
- Impacts on local infrastructure (electricity, water, natural gas, etc.),
- Environmental impacts (air pollution, noise, dust, waste management, natural resources/environmental pollution, etc.),
- Working conditions, employment and supply (materials, machinery and equipment, etc.) opportunities,
- Impacts on the health and safety of workers and the public during the construction phase,
- Impacts on cultural heritage,
- Increased population and traffic impacts during construction and operation,
- Opportunities to utilise quality and coverage of health services during operation stage,

In order to minimize and/or completely prevent above indicated potential environmental and social effects, mitigation activities and management methods have been identified for implementation at each stage of the Project (where relevant, feasible and/or necessary).

6.2 Construction Period Stakeholder Engagement

Notifying communities affected from the project, sharing opinions and ideas and ensuring mutual dialogue have great importance. For this reason, stakeholder engagement in construction stage, aims to ensuring information with regard to health and security of community and interest groups affected from the project with regard to progress of the project.

For this purpose, in order to minimize potential environmental and social effects indicated about during construction period and/or to completely prevent these effects by the Project Company (including but not limited to these ones), below indicated effect mitigation activities will be realized.

- Prepared Stakeholder Engagement Plan will be developed, updated and practiced according to characteristics and interests of the ones affected from changing project conditions and risks.
- Stakeholder Engagement Plan will include differentiated and specific measures to allow for effective engagement of those identified as disadvantaged or vulnerable.
- Access will be given to all stakeholders to clear, accurate, timely and objective notification on (including but not limited to) the following topics:
 - The purpose, nature and scale of the project,
 - Updated engagement program activities, including changes to be made on the programme and future activities,
 - Effect mitigation measures planned for all types of hazards, risks and possible effects for stakeholders,
 - Critical issues encountered during the project lifetime and corrective actions monitored and implemented,
 - Environmental and social performance indicators,
 - Complaint mechanism.
 - Other information about the project that is considered relevant for stakeholders.

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- Project information will take place on corporate website as required.
- Construction site entrances and exits, will be made on entrance/exit registration card controls, there will be trained security personnel in construction site entrance.
- Opinion expression opportunity will be given to communities that are subjected to project sourced risks and negative effects with regard to project risks, effects and mitigation activities and there will be a consultation process to be performed to allow SPV's consideration. Consultation process will be formed based on language preferences and decision-making processes of affected communities and needs of disadvantaged or vulnerable groups.
- During construction stage, the working areas of workers and machinery on the lands acquired by the company will be marked clearly.
- In case that land, crops and trees are damaged during construction activities or in case that agricultural activities are interrupted, damaged land will be transformed into their formed status and all assets affected will be compensated.
- Roads will be brought to at least pre-construction level.
- In case that there is an effect on water quality and any damage of water channels, the company will take required measures for mitigating these effects.
- Roads will be watered periodically to minimise and prevent effect of dust generated during vehicle passage.
- In order to manage unrealistic expectations, information will be given to local communities on number and types of employment opportunities available in the Project.
- Transparent and fair employment procedures will be applied.
- In personnel employment, priority will be given to qualified and experienced applicants from local communities and Sub-contractors will be promoted in this regard.
- Direct and/or indirect employment of women will be promoted actively.
- Compliance with the requirements of national legislation and standards on occupational health and safety will be ensured for all employees.
- In order to promote indirect employment opportunities and positive participation to local economy, goods and services will be taken from local sources as much as possible during the project stage.
- Cooperation and coordination will be ensured with relevant local institutions and organisations for health and safety of employees and the public.
- Systematic press scanning will be performed for considering and assessing negative articles published in press.
- All opinions and complaints will be taken into account in accordance with Suggestion/ Complaint/ Recommendation mechanism (Section 7).
- Construction site and facility security personnel will be notified with regard to suggestion / complaint/ recommendation mechanism, in case that a person from local people want to present an opinion or a complaint, security personnel will direct this person to relevant officer.
- In order to ensure sustainability of suggestion/ complaint/ recommendation mechanism, and to present suggestion/ complaint/ recommendations, there will be understandable and visible information on corporate website and there will be a suggestion/ complaint/ recommendation form and telephone number for contact and delivery of suggestion/ complaint/ recommendations of these persons.

6.3 Stakeholder Engagement in the Next Stage (Operation and Decommissioning stage)

Operation phase is the longest phase of the project. In beginning of operation period, effects of fixed activities in this period and current and/or new stakeholders will be taken into account, the scope of stakeholder engagement plan will be determined and it will be revised in line with this scope and shared with stakeholders on corporate internet page. Within the first six months after beginning of operation activities, there will be at least one public meeting for notifying stakeholders with regard to activity progress and afterwards, at least one notification meeting will be organized annually.

In case that some activities are realized except fixed ones that can cause a big change on possible environmental and social effects determined in this period, stakeholder engagement plan will be updated and it will be practiced by applying additional engagement and effect mitigation activities that can be required and/or that can be available in construction stage.

The purpose of stakeholder engagement during decommissioning stage will be to minimise closure-related impacts, particularly environmental, social and cultural heritage issues. Hospital operation will be transferred to the state 25 years later and stakeholder engagement activities with regard to performance of investment for renewing or rehabilitation in relevant sections for extending economic life of the facility in this stage or removing sections of the facility related to the project will also be organized by the company.

6.4. Engagement Program

Creating a clear timetable for Stakeholder Engagement Activities to be realized during the project period, is important to monitor engagement activities and following and thus managing engagement process in a healthy manner. Following table (Table 3) shows implementation schedule of defined programme of Stakeholder engagement activities together with above mentioned methods and tools, target groups, time and/or frequency.

Table 3: Stakeholder Engagement Program

Engagement Method / Tool	Target Stakeholder Groups	Stage	Period
Public General Meetings	All	Construction Operation	Once a year
Stakeholder Representatives Meetings	All	Construction Operation Decommissioning	<ul style="list-style-type: none"> • Quarterly (Construction) • Once a Year (Operation) • In number and frequency deemed necessary (Decommissioning)
Project Brochures	All	Pre-Construction Project Design, Construction	<ul style="list-style-type: none"> • Once (Project Design) • When required (Construction)
Correspondences	<ul style="list-style-type: none"> • National, regional and local public institutions and organisations, • Multinational and international organisations (IFC etc.), • NGOs • Interest groups, • Subcontractors and Suppliers, 	Project Design, Construction Operation, Decommissioning	When required
Media Announcements	All	Project Design, Construction Operation, Decommissioning	When required
Corporate Website	All	Construction Operation	Continuously
Direct Telephone Line	All	Construction Operation	Continuously
Suggestion / Recommendation/ Complaint Mechanism	All	Construction Operation, Decommissioning	Continuously
Education Programmes	<ul style="list-style-type: none"> • Project Employees, • Vulnerable Groups 	Construction Operation	When required

7 SUGGESTION, RECOMMENDATION, COMPLAINT MECHANISM

Suggestion, recommendation, complaint mechanism is a key management tool where communities and/or individuals that are affected from the project activities can express their concerns, requests and complaint officially to the Project Company, where they are assessed in a fair, transparent and satisfactory and consistent manner for all parties within a reasonable period, and where acceptable effective and productive solutions can be produced by the parties mutually and hence where stakeholders can establish constructive relations based on trust. For this reason, a “Suggestion, Recommendation, Complaint Procedure” (see DUM-ESMS-GRM-001) has also been established within the scope of the Project and this suggestion, recommendation and complaint mechanism is currently being operated in line with this procedure. .

*Officially: 1-3 Business Days
Preferably: 1 Business Day*

Suggestion, recommendation, complaint mechanism realizes followings specifically:

- It ensures ways to affected persons to present suggestion, recommendation and complaint and to solve any dispute that can arise during project application,
- It ensures recognition and application of actions mutually acceptable for satisfaction of suggestion, recommendation and complaint owners,
- It supports accessibility, anonymous application, confidentiality, equality, cultural compliance in consideration of suggestion, recommendation and complaints,
- It removes need to apply for judicial investigation (as long as it is not the last remedy).

*Officially: 15-30 Business
Days*

Use of suggestion, recommendation, complaint mechanism does not cause an obstacle for stakeholders for accessing other legal and administrative remedies and the Project Company provides guarantee that notification made through this way cannot be used against legal rights of stakeholder based on their status and that their rights will not be affected. Suggestion, recommendation, complaint mechanism’s application process is realized based on following stages.

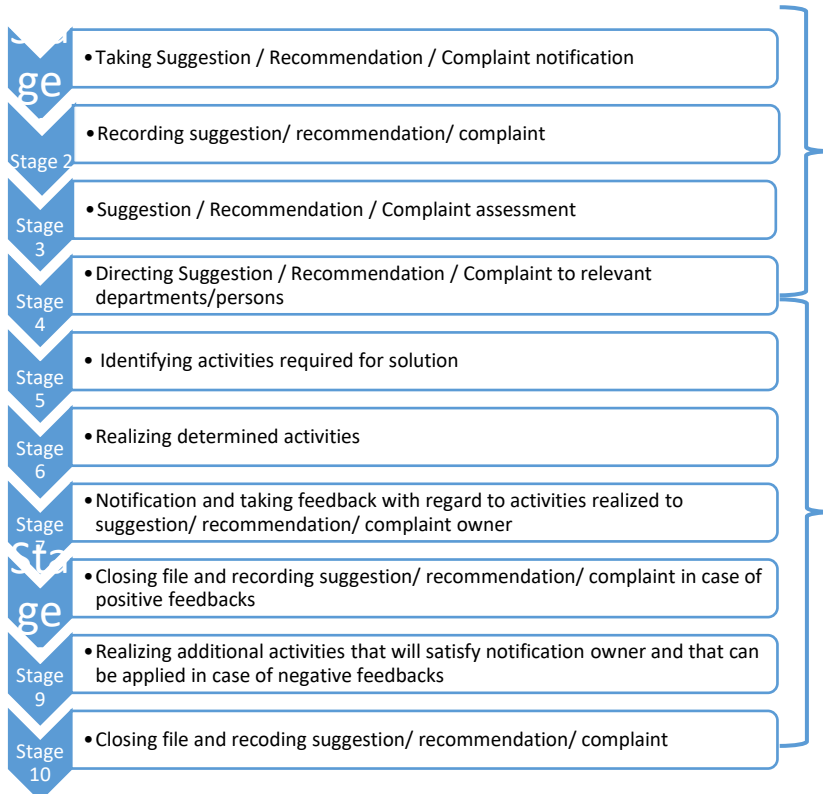


Figure – 1: Complaint Mechanism of the Project

Suggestion, recommendation, complaint procedure was clearly announced on corporate webpage of the Project Company for ensuring realization of stakeholder management and for ensuring its clear understanding. Suggestion, recommendation, complaint mechanism is open for access without need for a changer for all stakeholders and stakeholders are encouraged to use this mechanism to communicate their concerns, requests and complaints about the Project to the Project company.

Suggestion, recommendation, complaint mechanism, is coordinated by Public Relations Officer (PRO) who is responsible of suggestion, recommendation and complaints coming from stakeholders and who was appointed as the first interface in between stakeholders and the contractor.

8 MONITORING

8.1. Fundamental Monitoring Activities

Monitoring Stakeholder Engagement is important to realize whether consultation and notification works are efficient and to understand that there is an effective information exchange with stakeholders.

This plan will be reviewed annually to determine need for any update or change in this plan as long as a more frequent update is not required for reflecting changes possible for organization and management structure and procedures and working conditions in all stages of the project and construction methods. Feedback received from stakeholder engagement activities will be analysed and effectiveness of engagement processes will be monitored. Outputs of this monitoring will also provide data for management and supervision of overall environmental, health and safety (labour rights) and social performance of the project.

PRO will monitor performance of stakeholder engagement activities and adherence to planned timetable and will inform the management. In case that it is determined that there is a nonconformity for monitoring activities with the Project conditions and relevant reference documents, it will be investigated and appropriate corrective actions will be determined.

8.2 Key Performance Indicators

In order to assess effectiveness of planned and applied effect mitigation activities, a set of key performance indicators (KPI's) consisting following (including but not limited to additional ones) parameters. These will be used to assess progress and effectiveness of stakeholder engagement performance.

- Number of stakeholders receiving information about the project and sharing feedback,
- Number of consultation meetings and other public meetings held during the reporting period,
- Number of complaints received in a reporting period,
- Number of repeated complaints in a similar nature,
- Number of complaints resolved and closed within the stipulated time,
- Social responsibility projects and activities carried out during the project.

9 AUDIT, REPORTING and RECORD KEEPING

9.1 Audit

In order to ensure assessment of the plan's effectiveness, internal/external inspections and audits (by independent organisations) will be performed. Internal audit program, its frequency, scope and target and responsible internal auditors, engineering, supply and construction contractor (GÜRIŞ) will be indicated in the audit program to be developed, updated and applied by OHSE department.

Internal audit will address the followings:

- Confirmation that the procedures/instructions prepared/to be prepared in line with this Plan and the Plan are implemented in accordance with their content;
- Monitoring and audit reports and functionality of the review system,
- Review of records,
- Reviewing up-to-dateness of Stakeholder List
- Reviewing periodical reports

9.2 Reporting

All data related to all activities performed within the scope of this plan will be reported to SPV monthly and Project Creditors in case it is requested. In addition, PRO will prepare a periodical report annually during construction stage and it will be presented to the management and other required parties. Reports will include (but not be limited to) following information;

- General data with regard to number and type of mitigation activities performed,
- Stakeholder engagement and feedbacks,
- Problems, nonconformities, critical issues and corrective activities,
- Opinion, recommendation and complaint related data coming from internal/ external stakeholders
- Inspection, audit/ supervision results,

9.3 Record Keeping

Following records will be kept in relation to (but not limited to) stakeholder engagement during the Project performance;

- Recommendation, request, complaint records from internal/external stakeholders,
- Meeting, training records,
- Monitoring activities, inspection, audit/supervision records,
- Records regarding application of mitigation actions/measures
- Records with regard to management review/assessment
- Social responsibility activities,
- Stakeholder engagement meetings,
- Investigations and events,
- Correspondences,
- Past and current stakeholders,

ANNEXES:

Annex- 1: Project Stakeholder List

Annex- 2: Suggestion, Recommendation, Complaint Notification Form

Annex- 3: Project Contact Information

ANNEX-1 : Project Stakeholder List

Stakeholder list is updated and will be updated regularly during the project lifetime in a manner including new stakeholders defined and/or to be defined.

CATEGORY	LEVEL	ORGANIZATION/ INSTITUTIONS	STAKEHOLDER TYPE				
			INTERNAL	EXTERNAL			
				BASIC PARTNER	STRATEGIC PARTNER	BENEFICIARY / INTEREST GROUPS	
OFFICIAL INSTITUTIONS / ORGANISATIONS	NATIONAL	T.R. Ministry of Health		✓			
		General Directorate of Health Investments			✓		
		General Directorate of Management Services			✓		
		Public Hospitals Authority		✓			
		General Directorate of Health Services		✓			
		Department of Public Private Partnership		✓			
		General Directorate of Emergency Health Services			✓		
		Public Health Institution of Turkey			✓		
		T.R. Ministry of Environment, Urbanisation and Climate Change			✓		
		General Directorate of EIA, Permit and Audit			✓		
		General Directorate of Environmental Management			✓		
		General Directorate of Spatial Planning			✓		
		General Directorate of Protection of Natural Assets			✓		
		General Directorate of Land Registry and Cadastre			✓	✓	
		General Directorate of Construction Works			✓		
		T.R. Ministry of Labour and Social Security				✓	
		General Directorate of Labour				✓	
		General Directorate of Occupational Health and Safety				✓	
		Social Security Institution				✓	✓
		Vocational Qualification Authority				✓	✓
		T.R. Ministry of Agriculture and Forestry				✓	
		General Directorate of State Hydraulic Works				✓	✓
		T.R. Ministry of Energy and Natural Resources				✓	
		General Directorate of Electricity Generation Inc. .				✓	✓
		Energy Market Regulatory Authority				✓	✓

		General Directorate of Turkish Electricity Transmission Corporation A.Ş. .			✓	✓
		T.R. Ministry of Transport and Infrastructure			✓	
		General Directorate of Road Regulation			✓	
		T.R. Ministry of Culture and Tourism			✓	
		General Directorate of Foundations			✓	
		General Directorate of Cultural Heritage and Museums			✓	
		T.R. Ministry of Family and Social Services			✓	
		General Directorate of Family and Community Services			✓	
		General Directorate of Information Technologies			✓	
		T.R. Ministry of Internal Affairs			✓	
		General Directorate of Security			✓	
		Gendarmerie General Command			✓	
		Disaster and Emergency Management Presidency			✓	
		Internal Audit Department			✓	
		Security and Emergency Situations Coordination Centre			✓	
		General Directorate of Provincial Administration			✓	
		General Directorate of Population and Citizenship Affairs			✓	
		Directorate General for Relations with Civil Society			✓	
		Union of Chambers of Turkish Engineers and Architects			✓	
		Confederation of Turkish Tradesmen and Craftsmen			✓	
		LOCAL	Governorship of Kütahya			✓
	Kütahya Municipality					
	Kütahya Municipality, Transport Coordination Department				✓	
	Governorship of Kütahya, Provincial Health Directorate				✓	
	Governorship of Kütahya, Provincial Directorate of Public Health				✓	
	General Secretariat of Kütahya Provincial Public Hospitals			✓	✓	
	Kütahya Provincial Directorate of Social Security Institution				✓	
	General Directorate of Highways - 145th Branch Chief Office.				✓	
	Kütahya Provincial Directorate of Environment and Urbanisation				✓	
	State Hydraulic Works 34th Branch Directorate.				✓	
	T.R. Kütahya Provincial Directorate of Family and Social Services				✓	
	Kütahya Provincial Police Directorate				✓	
	Yoncalı Gendarmerie Command			✓		
Kütahya Disaster and Emergency Management Directorate			✓			
Kütahya Provincial Directorate of Culture and Tourism			✓			
Osmangazi Elektrik Dağıtım A.Ş.			✓	✓		
ÇİNİGAZ Doğalgaz Dağıtım San. ve Tic. A.Ş.			✓	✓		

		Kütahya T Type Closed and Open Prison			
		Evliya Çelebi Neighbourhood Mukhtar's Office		✓	
		Okmeydanı Neighbourhood Mukhtar's Office		✓	
		İstiklal Neighbourhood Mukhtar's Office		✓	
		Bahçelievler Neighbourhood Mukhtar's Office		✓	
		Lala Hüseyin Paşa Neighbourhood Mukhtar's Office		✓	
		Gültepe Neighbourhood Mukhtar's Office		✓	
		Yoncalı Neighbourhood Mukhtar's Office		✓	
UNIVERSITIES	NATIONAL / LOCAL	Middle East Technical University (Ankara)		✓	✓
		Osmangazi University (Eskisehir)		✓	✓
		Dumlupınar University (Kütahya)		✓	✓
FINANCIAL INSTITUTIONS	NATIONAL / INTERNATIONAL	European Bank for Reconstruction and Development		✓	✓
		International Finance Corporation (IFC)		✓	✓
		Türkiye İş Bankası A.Ş.		✓	✓
		T.R. Ziraat Bankası A.Ş.		✓	✓
		Industrial Development Bank of Turkey		✓	✓
		ICBC Turkey Bank A.Ş.		✓	✓
HOSPITALS (PUBLIC / PRIVATE)	LOCAL	Evliya Çelebi State Hospital		✓	✓
		D.U. Evliya Çelebi Training and Research Hospital		✓	✓
		Private Kütahya Anadolu Hospital		✓	✓
		Private Kütahya Park Hayat Hospital		✓	✓
		Yoncalı Physical Therapy and Rehabilitation Hospital		✓	✓
NONGOVERNMENTAL ORGANISATIONS (ASSOCIATIONS / FOUNDATIONS / COOPERATIVES)	NATIONAL / LOCAL	Young Businessmen and Executives Association			✓
		Turkish Medical Association			✓
		Public Employees Health and Social Services Union			✓
		Turkish Dental Association			✓
		Trade Union(s) in the Health Services Sector in Turkey :			✓
		Union of Health and Social Services Employees			✓
		Union of All Health and Social Services Employees			✓
		Union of Health Employees			✓
		Union of Turkish Public Employees			✓
		Turkish Red Crescent, Kütahya Office			✓
		Kütahya Chamber of Commerce and Industry			✓
		Turkish Union of Health Employees			✓
		Social Assistance and Solidarity Foundation			✓
		Culture and Education Foundation			✓
		Association for Anti-Poverty and Unemployment			✓
		Turkish Press Union			✓
		Six Points Association of the Blind			✓
		Turkey Health Foundation			✓

		Turkey Health Tourism Association				✓
		Turkey Association of Handicapped Persons				✓
		Social Rights and Solidarity Association				✓
		Active Industrialists and Businessmen Association				✓
		The ones in Kütahya Province (or nationwide if not available) apart from the above-mentioned ones; - Human Rights, - Environment and Natural Life, - Health, - Culture, - Law, - Economic, Social and Community Solidarity etc., representative offices of other national organisations, associations, foundations and cooperatives				
PROFESSIONAL ORGANISATIONS	NATIONAL / LOCAL	Union of Chambers of Tradesmen and Craftsmen of Kütahya			✓	
		Kütahya Provincial Representative Office of Chamber of Mechanical Engineers			✓	
		Kütahya Provincial Representative Office of Chamber of Geophysical Engineers			✓	
		Kütahya Provincial Representative Office of Chamber of Architects			✓	
		Kütahya Provincial Representative Office of Chamber of Civil Engineers			✓	
		Kütahya Provincial Representative Office of Chamber of Map Engineers			✓	
		Kütahya Provincial Representative Office of Chamber of Environmental Engineers			✓	
		Kütahya Provincial Representative Office of Chamber of City Planners			✓	
COMMERCIAL ENTERPRISES / COMPANIES	NATIONAL / INTERNATIONAL / LOCAL	Suppliers of Materials to be used within the scope of the Project				✓
		Kütahya Menderes Hotel				✓
		MEB (Ministry of National Education) Yoncalı Practice Hotel				✓
		Yoncalı Sefa Thermal Hotel				✓
		Yoncalı Es Thermal Hotel				✓
		Other Small Enterprises in the vicinity of the Project Area				✓
COMMUNITIES / PEOPLE	LOCAL	All Employees of the Project (Company, Main and Subcontractor) in Construction and Operation Stage	✓			✓
		Sub-employers (Subcontractors)			✓	✓
		Patients and Patient Relatives				✓
		Project and Patient Visitors				✓
		Residents of Evliya Celebi Neighbourhood				✓
		Residents of Okmeydanı Neighbourhood				✓
		Residents of Gültepe Neighbourhood				✓
		Residents of İstiklal Neighbourhood				✓
		Residents of Bahçelievler Neighbourhood				✓
Residents of Yoncalı Neighbourhood				✓		
MEDIA	NATIONAL / LOCAL	Written and Visual Media Organisations			✓	

Annex – 2 : Suggestion, Recommendation, Complaint Notification Form

GÜRIŞ		SUGGESTION, RECOMMENDATION, COMPLAINT NOTIFICATION FORM		Record No:
				Date
If you do not want to provide your personal information, you can leave this space blank. Your notifications/applications will still be taken into assessment by us				
THE APPLICANT	<input type="checkbox"/> Person		Name-Surname:	
	<input type="checkbox"/> Organization/Institution		Name/Title:	
	Contact Information (Enter information belonging to AT LEAST ONE section for contract and mark it):			
	<input type="checkbox"/> Telephone No:		<input type="checkbox"/> E-mail:	
<input type="checkbox"/> Mail address:				
<input type="checkbox"/> I request not to disclose my identity and contact information without my permit.				
Application Reason: <input type="checkbox"/> Suggestion <input type="checkbox"/> Recommendation <input type="checkbox"/> Complaint <input type="checkbox"/> Request				
Details regarding application (Please use back page of this form in case of need with regard to subject related to your application):				
Application Subject/Event: <input type="checkbox"/> First/Single Time <input type="checkbox"/> A Few Times (Number:) <input type="checkbox"/> Continuously /Currently ongoing				
Opinion, Recommendation and Requests of the Application for Solving a Subject: (Use back page of this form in case of need)				
Type of Application: <input type="checkbox"/> Notification Form <input type="checkbox"/> Telephone <input type="checkbox"/> Face to Face <input type="checkbox"/> Other (.....)				
Filled By	<input type="checkbox"/> The Applicant (Name-Surname/ Signature)		<input type="checkbox"/> Other (Name-Surname/ Signature)	
THIS PART WILL BE FILLED BY THE COMPANY (GÜRIŞ)				
APPLICATION	Recorded (Y/N):	Taken into assessment (Y/N):	Responsible department/person:	
	Required and Performed Activities for Solution			
	Activity Completion Date:		Response Date:	
This section will be filled and signed mutually in case that it is satisfied from performed work and transaction by the applicant based on application.		The Application (Name-Surname/Date/Signature)		GÜRIŞ (Name-Surname/Date/Signature)
FILE CLOSED	CLOSURE DATE	RECORDED	RECORDED BY (Name-Surname/Date/Signature)	
<input type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> YES <input type="checkbox"/> NO		
Annexes if any:				

Annex-3: Project Contact Information

Following methods and tools can be used to notify suggestion, recommendation and complaints with regard to the Project and/or to notify internal/ external stakeholders with regard to the Project during the project lifetime (in construction and further periods) within the scope of the Project.

• In Construction Stage

- Suggestion, Recommendation, Complaint Notification Boxes (located in various places in the workplace such as diners, employee social facilities, offices, etc.)
- Suggestion, Recommendation, Complaint Notification Form (Annex-2)
- Project Direct Telephone Line (+90 274 231 75 76)
- Project Address (Evliya Çelebi Mahallesi Ekenpaşa Cad. No: 21 Merkez / KÜTAHYA P.K. : 43100)
- Public Relations Officer
 - Name-Surname: Kemal BOL
 - Telephone: +90 532 660 71 31
 - E-mail: kbol@guris.com.tr
- Project Company Address (Ankara Cad. No: 222 Gaziosmanpaşa Mah. Gölbaşı / ANKARA P.K.: 06830)
- Project Company Telephone Line (+90 312 484 05 70)
- Project Company Fax (+90 312 484 26 77)
- Corporate Email: (info@guris.com.tr)
- CİMER: Turkish Presidential Communication Centre
 - Telephone ("Alo 150")
 - E-mail: www.cimer.com.tr
 - Mail Address (T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe, Ankara, TURKEY)

• In Further Stages

In addition to the above-mentioned means of communication;

- SABİM: Ministry of Health Contact Centre
 - Telephone (Alo 184)
 - WhatsApp (0541 888 0184)
 - E-mail: sabim@saglik.gov.tr
 - Fax 0312 286 13 57 Tel: 184 – 0312 258 50 63
 - Mail: Ziyabey Cad. 1419 Sok. No:9 Balgat Ankara/Turkey
- SBN: Ministry of Health, Health Meeting Point
 - Telephone ("Alo 182")
 - E-mail: <https://sbn.saglik.gov.tr/>