ARSLAN ALUMINUM INC.

PRODUCTION FACILITIES

STAKEHOLDER PARTICIPATION PLAN (SPP)

MAY

2026

BİLECİK

ARSLAN ALUMINUM Inc

PRODUCTION PLANT

STAKEHOLDER PARTICIPATION PLAN (SPP)

Revision	Date	Prepared by	Approved By
01	May 23, 2026	Harun CAN, R&D Quality Assurance Manager	Pınar ARSLAN Deputy General Manager

May 2026 BİLECİK

ARSLANALUMINUM Inc.

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4. Factory: HÜRRİYET 2nd OSB Neighborhood, 8th St., ARSLAN ALUMINUM, Block No. 8, CENTER / BİLECİK

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ABBREVIATIONS

KSP	Corporate Social Responsibility Projects
EIA	Environmental Impact Assessment
IFC	International Finance Corporation
İŞKUR	Turkish Employment Agency
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
HKT	Public Participation Plan
PKP	Stakeholder Participation Plan
KSP	Corporate Responsibility Projects

1 INTRODUCTION

This plan presents the Stakeholder Engagement Plan (PKP) for Arslan Aluminum A.Ş. in Turkey, and "Arslan Aluminum A.Ş." (hereinafter referred to as "Arslan Aluminum").

The purpose of the Stakeholder Engagement Plan is to guide facility management on the following matters:

• Establishing and maintaining constructive relationships with stakeholders, particularly communities affected by the facilities,

• To improve the facility's environmental and social performance through the active participation of stakeholders,

• Ensuring that relevant environmental and social information is communicated to all stakeholders throughout the facilities' lifecycle and encouraging communities affected by the facilities within the framework of stakeholder engagement,

• To ensure that all stakeholders have access to information and provide opportunities for potential issues to be raised,

• To foster transparent and participatory communication in accordance with sustainability principles,

• To ensure that groups affected by facility operations have access to appropriate communication channels to voice their potential concerns and complaints, and to assist in the successful management of the process by responding appropriately to these concerns and complaints.

This Stakeholder Engagement Plan includes the following:

- Identification of stakeholders for the facilities,
- Analysis of stakeholders' relationships with the facilities,
- Detailed consultation methodologies,
- Activities conducted to date and planned for the future,
- Stakeholders' concerns and complaints the in detail and explains how the stakeholder engagement process will be documented, monitored, evaluated, and reported.

2 ABOUT ARSLAN ALUMINUM

Arslan Aluminum combines its expertise in production with advanced design and product development techniques to bring high-quality products to the market.

Arslan Aluminum is one of Turkey's leading industrial companies and exports to over 50 countries. By combining its expertise in aluminum billet casting and extrusion profile production with advanced design and product development techniques, the company brings its high-quality products to market under its own brand.

The facilities hold quality certifications in accordance with international norms and standards, including ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO 27001, and EN 15088.

– Recycled billets and profiles

– Anodizing

– Vertical painting line with a capacity of 2,500,000 kg/month

Arslan Aluminum operates four production facilities located in the first and second organized industrial zones (OSB) of Bilecik. The total open area of the current facilities is 350,000 m², and the total enclosed area is 130,000 m².
Although numbers vary daily, Arslan Aluminum currently employs 426 people. The existing facilities provide employees with a cafeteria, restrooms, changing rooms, a prayer room, and break areas.

A summary of information regarding employees at Arslan Aluminum is provided below:

CITY	NUMBER OF EMPLOYEES
Bilecik	412
Istanbul	14
Grand Total	426

COLLAR	MEN	WOMEN	Grand Total
White-Collar	42	16	58
Blue-Collar	288	66	354
Grand Total	330	82	412

Disability Status	Male	Female	Grand Total
People with Disabilities	12	0	12
Non-Disabled	318	82	400
Grand Total	330	82	412

Benefits offered to employees:

We provide our employees with an annual salary bonus, fuel allowance, cash holiday allowance before religious holidays, and housing support.

Arslan Aluminum seeks to improve the facility's environmental and social performance and requires supporting documentation to that effect. This Stakeholder Engagement Plan has been prepared in accordance with the IFC Performance Standards. The goal is to conduct effective and inclusive consultations throughout the facility's operational lifespan and to maintain an efficient stakeholder engagement process.

3 ARSLAN ALUMINUM COMPLEX

Arslan Aluminum's facilities are located within the boundaries of Bilecik. Figure 3-1 below shows the location of the facilities.

Figure 3-1. Location of the Facilities

4 REGULATORY REQUIREMENTS

This section outlines how the Project will organize its stakeholder engagement activities in accordance with national and international requirements.

4.1 Turkish Legislation

The "Environmental Impact Assessment Regulation (dated November 25, 2014, No. 29186, and amended on May 26, 2017; No. 30077)" defines the administrative and technical procedures and principles to be followed throughout the EIA process. According to the EIA Regulation, pursuant to Article 24 of the Regulation, a Public Participation Meeting (PPM) is not required for the Project. The PPM under the scope of the Regulation is presented separately.

Table 4-1. National Legislation

NATIONAL LEGISLATION	
Environmental Impact Assessment	
Turkish Environmental Law	Official Gazette No.: 18132; Publication Date: 1983 (Amendment No.: 7579-May 22, 2026)
Regulation on Environmental Impact Assessment	Official Gazette No. 31907, Date: July 29, 2022 (Amendment No.: 33187-March 5, 2026)
WATER	
Water Pollution Control Regulation	Official Gazette No. 25687, Date: December 31, 2004 (Amendment No. 33056—October 23, 2025)
Law on Groundwater	Official Gazette No. 167, Published: 1960
Air	
Regulation on the Control of Industrial Air Pollution	Official Gazette No. 27277, Date: July 3, 2009 (Amendment No. 31296-November 6, 2020)
Regulation on Air Quality Assessment and Management	Official Gazette No. 26898, Date: June 6, 2008 (Amendment No. 27219—May 5, 2009)
Regulation on the Regulation on the Control of Odor-Causing Emissions	Official Gazette No. 28712, Date: July 19, 2013
Regulation on the Monitoring of Greenhouse Gas Emissions	Official Gazette No. 29003, Date: May 17, 2014 (Amendment No. 30082, Date: May 31, 2017
Regulation on Fluorinated Greenhouse Gases	Official Gazette No. 31881, Date: June 29, 2022

Regulation on Environmental Permits and Licenses	Official Gazette No. 29115, Date: September 10, 2014 (Amendment No. 32113, Date: February 23, 2023)
Regulation on Exhaust Gas Emission Control	Official Gazette No. 30004, Date: March 11, 2017 (Amendment No. 31463, Date: April 23, 2021)
Regulation on Pollutant Release and Transfer Registries	Official Gazette No. 31679, Date: December 4, 2021
Law No. 5403 on Soil Protection and Land Use (Amended by Law No. 6537)	Official Gazette No. 25880, July 3, 2005
Regulation on the Control of Soil Pollution and Contaminated Sites with Point Sources	Official Gazette No. 27605, Date: June 8, 2010 (Amendment No. 28704, Date: July 11, 2013)
Noise	
Regulation on Environmental Noise Control	Official Gazette No. 32029, Date: November 30, 2022
Regulation on the Protection of Buildings Against Noise	Official Gazette No. 30082, Date: May 31, 2017 (Amendment No. 30437—May 31, 2018)

Waste	
Regulation on Waste Management	Official Gazette No. 29314, Date: April 2, 2015 (Amendment No. 30016, Date: March 23, 2017)
Regulation on the Management of Waste Oils	Official Gazette No. 30985, Date: December 21, 2019 (Amendment No. 3207, Date: January 12, 2023)
Regulation on the Landfilling of Waste	Official Gazette No. 27533, Date: March 26, 2010 (Amendment No. 31876, Date: June 24, 2022)
Regulation on the Management of Regulation on the Management of Waste Electrical and Electronic Equipment	Official Gazette No. 32055, Date: December 26, 2022
Regulation on the Control of Vegetable Waste Oil	Official Gazette No. 29378, dated June 6, 2015
Regulation on the Control of Packaging Waste	Official Gazette No. 31523, Date: June 26, 2021
Regulation on the Recycling Participation Fee	Official Gazette No. 30995, Date: December 31, 2019 (Amendment No. 32481, Date: March 6, 2024)
Regulation on the Control of Medical Waste	Official Gazette No. 29959, Date: January 25, 2017 (Amendment No. 31927, Date: August 18, 2022)
Regulation on the Inspection of End-of-Life Tires	Official Gazette No. 26357, Date: November 25, 2006 (Amendment No. 29292, Date: March 11, 2015)
Regulation on the Control of Waste Batteries and Accumulators	Official Gazette No. 25569, Date: August 31, 2004 (Amendment No. 29214, Date: December 23, 2014)
Zero Waste Regulation	Official Gazette No. 30829, Date: July 12, 2019 (Amendment No. 31623, Date: October 9, 2021)
Chemical	
Regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals	Official Gazette No. 30105, Date: June 23, 2017 (Amendment No. 32408, Date: December 23, 2023)
Regulation on Persistent Organic Pollutants	Official Gazette No. 30595, Date: November 14, 2018 (Amendment No. 31434, Date: March 25, 2021)
Regulation on the Export and Import Regulation	Official Gazette No. 32087, Date: January 28, 2023
Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects	Official Gazette No. 30702, Date: March 2, 2019
Geology and Seismicity	
Regulation on Structures to Be Constructed in Disaster Zones	Official Gazette No. 26582 Date: July 14, 2007
Labor and Working Conditions	
Occupational Health and Safety Law	Law No. 6331, Date of Approval: 2012
Regulation on Employers	Official Gazette No. 27010, July 27, 2008
Labor Code (No. 4857)	Official Gazette No. 25134, June 10, 2003 (Amendment Date: May 1, 2026)

Stakeholder Participation	
Right to Information (No. 4982)	Official Gazette No. 25269, October 24, 2003

- ***International Standards***

This report was prepared in accordance with the relevant IFC Performance Standards and international requirements. IFC is an international financial institution that provides advisory and asset management services to help organizations improve their operations by developing and implementing environmental and social management systems. It was established in 1956 as the private sector arm of the World Bank Group to reduce poverty, promote development, and advance economic growth by investing in commercial projects. To provide a framework for managing social and environmental risks and impacts

, the IFC established the Sustainability Performance Standards, which were updated in 2012. The Performance Standards are designed to help prevent, mitigate, and manage risks and impacts as a means of conducting business sustainably—including the client's obligations regarding stakeholder engagement and information sharing—in relation to project-level activities. In other words, while guiding its business activities to achieve its overall development goals, IFC applies its Sustainability Framework in conjunction with its other strategies, policies, and initiatives. The Performance Standards may also be applied by other financial institutions.

IFC is required to apply the following eight Performance Standards throughout the duration of its investments:

Performance Standard 1: Assessment and Management of Environmental and Social Risks
and Impacts Performance Standard 2: Business and Working Conditions
Performance Standard 3: Resource Efficiency and Pollution Prevention
Performance Standard 4: Public Health, Safety, and Security Performance
Standard 5: Land Acquisition and Involuntary Resettlement
Performance Standard 6: Conservation of Biodiversity and Sustainable Management of Living Natural Resources
Performance Standard 7: Indigenous
Peoples Performance Standard 8:
Cultural Heritage

The IFC guidelines to be followed during this project are as follows:

- IFC General E&S Guidelines dated April 30, 2007,
- IFC Performance Standards Environmental and Social Management System Implementation Handbook for Metal Products Manufacturing

The AIIB is an international organization that provides a multilateral regional financing and investment platform for infrastructure development and enhanced connectivity in Asia. The Bank's objective is to increase multilateral development support provided to regional economies for infrastructure development and improvement. The AIIB also works in close collaboration with other banks and development organizations.

The AIIB's Environmental and Social Framework supports environmental and social sustainability and the development of infrastructure services in Asia. The purpose of this comprehensive policy is to ensure the systematic development of infrastructure services through a robust Environmental and Social Management Plan and to provide the necessary support to relevant projects in this regard.

The AIIB's detailed mandatory environmental and social requirements are addressed under the Environmental and Social Standards (ESS) listed below:

- ESS 1: Environmental and Social Assessment and Management (AIIB ESS 1)
- ESS 2: Involuntary Resettlement (AIIB ESS 2)
- ESS 3: Indigenous Peoples (AIIB ESS 3)

5 ROLES AND RESPONSIBILITIES

Arslan Aluminum employs various methods to monitor compliance with Turkish legislation and track changes. Specialized personnel, ISO 14001 certification, and corporate relations and legal advisory services are among the tools used for regulatory compliance. In-house training sessions are organized to keep employees informed on these topics. These sessions cover subjects such as sustainability, water scarcity, combating and adapting to climate change, gender equality, inclusivity, energy management, waste disposal, carbon emissions, and occupational safety and health (OSH) standards.

Arslan Aluminum operates in accordance with the International Finance Corporation (IFC) Environmental and

Social Sustainability Performance Standards

in accordance with the International Finance Corporation (IFC) Environmental andSocial Sustainability Performance Standards. For this reason, it has identified its internal and external stakeholders. Internal stakeholders include all employees working within the company, while external stakeholders include residents of nearby communities, government agencies, subcontractors, suppliers, customers, and NGOs. The stakeholders are listed in Chapter 6.

Within Arslan Aluminum, Harun CAN, the Director of R&D and Quality Assurance, has been appointed as the Stakeholder Engagement Plan Manager to oversee compliance with the social components of the IFC Performance Standards. The identification of stakeholders, communication methods, and performance audits are covered in subsequent sections.

Facility Management will ensure that all affected parties—particularly affected communities, local residents, neighboring facilities, and nearby government agencies—are informed about the Facility. These groups will be involved in the process of identifying key issues related to the Facility. The roles and responsibilities defined to facilitate effective stakeholder engagement at the Facility are listed in the table below:

Table 5-1. Key Roles and Responsibilities

Board of Directors Ensures the implementation of the Stakeholder Engagement Plan
Stakeholder Engagement Plan Manager Ensures the implementation of the Stakeholder Engagement Plan Provides the resources necessary for the effective implementation of this plan
Stakeholder Engagement Plan Officers Implementation and development of the Stakeholder Engagement Plan Identifies the resources necessary for the effective implementation of the Stakeholder Engagement Plan and presents them to department managers. Assesses the compliance of facility operations with national and international regulations. Develops and communicates Complaint Management procedures. As the point of contact, collecting complaints received from the local community, the public, NGOs, and relevant groups; forwarding received complaints to the relevant parties; receiving, reviewing, investigating, and following up on complaints; and referring received complaints to the relevant units for resolution Implementing, monitoring, and evaluating the regulations within the scope of the complaint procedure. Regularly reviewing the Complaint Mechanism as a result of changes in employment legislation and lessons learned from the operation of the facilities Regular review of the Complaint Mechanism

Stakeholder Engagement Plan Officers:

Stakeholder Engagement Plan Manager: Harun CAN (R&D and Quality Assurance Manager)

Disciplinary and Ethics Committee Representative: Pınar ARSLAN

External Stakeholder Communication Officer: Cemre

TOKU Internal Stakeholder Communications Officer: Emine KUTLUCA

6 FACILITY STAKEHOLDERS

The purpose of stakeholder identification is to determine which stakeholders may be directly or indirectly affected—positively or negatively—(affected parties) or may have an interest in the Project (interested parties).

It is important to be aware that disadvantaged and vulnerable groups affected by the Project

and special

efforts must be made to overcome this challenge. The Stakeholder Engagement Plan takes into account, when defining a stakeholder, that this individual or group may be directly or indirectly affected by the Project. Additionally, other individuals and groups interested in the Project or having an impact on it are also included in the plan.

The stakeholder identification process continues throughout the Project's lifecycle. It must be reviewed and updated regularly. Since stakeholder identification is an ongoing process, different stakeholders become involved in the Project on various issues. Therefore, stakeholders can be categorized based on their connection to the Project. Understanding a stakeholder group's connection to the Project helps in defining the fundamental objectives of stakeholder engagement. Table 6-1 shows the stakeholders who are interested in and affected by the Project.

According to the IFC Handbook, stakeholders are "individuals or groups who are directly or indirectly affected by a project, as well as those who may positively or negatively influence its outcomes." Stakeholder engagement criteria vary by project. Many factors—such as the location of the project or facility, the cultural characteristics of the area, and the facility's scope of operations—serve as criteria for identifying stakeholders. Stakeholders should first be identified by the company.
It is not always possible for the public to know whether they will be affected by the facility. However, new stakeholders may be added to the initially identified group throughout the facility's lifespan.

External stakeholders—including suppliers, contractors, customers, local governments, government agencies, vocational schools, industrial zone management, civil society organizations, certification bodies, academic communities, and neighboring facilities—should also be identified as stakeholders of the facility. Arslan Aluminum will have an obligation to communicate all activities relevant to its stakeholders throughout the facility's lifespan. As part of its commitment to human rights, it will address complaints, suggestions, and requests for information received from external sources.

Internal stakeholders, on the other hand, include workers at every level who are employed directly at the facility. Arslan Aluminum has certain responsibilities toward all its employees. These responsibilities begin with the full implementation of the provisions set forth in Turkish legislation.

In addition, the company is committed to treating all employees fairly, ensuring the sustainable improvement of employee-management relations, protecting vulnerable groups such as child laborers and migrant workers,

creating safe and healthy working conditions, and avoiding practices such as forced or compulsory labor.

Along with these principles regarding human and labor rights, the company will also require and monitor compliance from the firms it does business with.

Arslan Aluminum will establish a mechanism to facilitate the participation of all stakeholders and will use all available communication channels to publicize it. However, it is not possible to reach all stakeholders equally. A key point that must not be overlooked in this regard is reaching people belonging to vulnerable groups. Arslan Aluminum will conduct studies to identify these vulnerable groups.

It is important to recognize that disadvantaged and vulnerable groups affected by facility operations

and to address this situation. The Stakeholder Engagement Plan considers, when defining a stakeholder, whether that individual or group may be directly or indirectly affected by the facility. In addition, other individuals and groups interested in or affecting the facilities are also included in the plan.

The stakeholder identification process continues throughout the facility's lifecycle. It must be reviewed and updated regularly. Since stakeholder identification is an ongoing process, different stakeholders are involved in different issues. Therefore, stakeholders can be categorized based on their connection to the facility. Understanding a stakeholder group's connection to the facility helps in determining the fundamental objectives of stakeholder engagement.

Table 6-1 shows the stakeholders who are interested in and affected by the facility. Table 6-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
General Public		
• Vocational High Schools • Neighbors in Bilecik 1st and 2nd Industrial Zones	√	√
Educational Units		
• Bilecik Şeyh Edebali University	√	√
Public Administration Units		
• Ministry of Energy and Natural Resources • Ministry of Labor and Social Security • Bilecik Central District Governor’s Office • Bilecik Governor’s Office • Bilecik Governor’s Office, Provincial Directorate of Environment, Urban Planning, and Climate Change • Bilecik Chamber of Commerce and Industry	√	√
Municipalities • Bilecik Municipality	√	√
NGOs	√	√
Internal Stakeholders		
Arslan Aluminum Employees	√	√
Contractors/Subcontractors/Suppliers	√	√
Customers	√	√
Certification Bodies	√	√
Vulnerable Groups	√	√

7 STAKEHOLDER ENGAGEMENT TOOLS

A range of tools and methods have been and will continue to be used to facilitate stakeholder engagement within the facilities. In addition to the communication mechanisms already in place, new mechanisms deemed appropriate will be incorporated into the process to ensure efficient and effective stakeholder engagement throughout the facilities' lifecycle.

The methods used to communicate with stakeholders are listed below:

• Formal and informal face-to-face meetings (individual and group) – this will be the primary form of consultation throughout the facility's lifespan. This includes stakeholder meetings planned by the facility or requested by stakeholders.

• Arslan Aluminum website (www.arslanaluminyum.com) – public announcements, documents, reports, management plans, etc.

• Complaint mechanism—specifically targeting directly affected stakeholders. Details of this mechanism are outlined in Section 10 of this document.

- Media announcements—invitations to meetings, information sharing, etc.

STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder participation will continue throughout the life of the Facilities. Key stakeholders will be informed about the Facilities' operations. They will have the opportunity to provide feedback on the effectiveness of mitigation and remediation measures and to raise any issues or complaints.

The information to be shared following the implementation of this report will include (but is not limited to):

• Impacts identified after the report's implementation begins,

• The impacts of the report's implementation and the mitigation or remediation methods currently being implemented,

• Roles and Responsibilities,

Monitoring and management methods,

• Information regarding the complaint mechanism

The following measures will be taken to ensure effective stakeholder participation:

• The Stakeholder Engagement Plan will be distributed to all stakeholders,

• The Stakeholder Engagement Plan will be reviewed annually by the responsible manager,

• Arslan Aluminum will take this plan into account when communicating with affected stakeholders and other relevant parties.

The facility's Stakeholder Engagement Plan coordinators will be responsible for engaging with stakeholders as an ongoing process throughout the facility's lifespan. Complaints may serve as an indicator of growing stakeholder concerns (both real and perceived) and may escalate if not identified and resolved. Identifying complaints and finding solutions to them will support the development of positive relationships between the Facility and stakeholders within its area of influence.

Arslan Aluminum has established an internal Complaint Mechanism. This will provide a formal and ongoing channel for stakeholders to engage with the Facility. With the implementation of this plan, this formal complaint mechanism—established free of charge for internal and external stakeholders—will not hinder access to solutions.

With the implementation of the Stakeholder Engagement Plan, internal and external stakeholders will be able to share their ideas and complaints through a variety of options, such as the Arslan Aluminum website, mail, and face-to-face meetings. Suggestion/request boxes for complaints and suggestions are located in various areas of the facility. Additionally, the email address "etik@arslanaluminyum.com "
has been created for stakeholders to submit their complaints. Complaints must be responded to within 6 business days from the date they are forwarded to the relevant department.

Under the "open-door policy" in effect, employees will be able to submit their complaints and suggestions directly manager. This policy encourages employees to express their own views and ideas and voice their complaints regarding legal and ethical issues as well as matters related to work quality. The Stakeholder Engagement Monitoring Program can be developed according to Arslan Aluminum's needs, as shown in the table below.

Table 8-1. Stakeholder Engagement Monitoring Program

Stakeholder Groups	Scope	Frequency	Methods and Tools
Surrounding Communities • Vocational High Schools • Neighboring Facilities in the 1st and 2nd Industrial Zones • University	• Hiring Process • Social Responsibility Projects • Updates on Facility Operations and progress • Informative meetings regarding public complaints, requests, and feedback	Annual, as needed	Website Email notifications Phone calls
• Public Institutions • Energy and Ministry of Natural Resources • Ministry of Labor and Social Security • Bilecik Governor's Office • Bilecik Governor's Office Provincial Directorate of Environment, Urban Planning, and Climate Change • Bilecik Chamber of Commerce and Industry • Ministry of Industry and Technology • Turkish Employment Agency (İŞKUR) • Organized Industrial Zone (OSB) Directorates	• Upon request, updates on and progress • Organizing explanatory meetings regarding public complaints, requests, and feedback • Local procurement and employment data.	Annual As Needed	Website Email notifications Phone calls

Municipalities • Bilecik Municipality	• Upon Request Updating on Facility Operations and Progress Updates • Explanatory meetings regarding explanatory meetings	Annual As Needed	Website, Email Updates Phone Calls
Facility Staff	• Monthly Monthly review of complaint mechanism implementations	Ongoing	Suggestion Boxes Information Boards Emails to all employees via email etik@arslanaluminyum.com) Arslan
Customers	• Request if Facility Updates on an d progress updates	Ongoing	Website Email Notifications
Contractors/Subcontractors/Suppliers/NGOs/	• Upon Request, Updates on Facility Operations and progress • Local procurement and	Ongoing	Website, Email Updates Phone Calls
Certification bodies	• Upon request, updating on facility operations and progress Updates	Ongoing	Website and Email Updates Phone Calls
Vulnerable Groups	• Facility Monthly review of complaint mechanism implementations	Ongoing	Suggestion boxes Information boards To all employees Email: etik@arslanaluminyum.com Arslan Aluminum website

The complaint mechanism will be managed by Cemre TOKU, the External Stakeholder Communications Officer, who serves as the primary interface between the public and Arslan Aluminum. Confidentiality procedures will be implemented to adequately protect the complainant.

The complaint mechanism will be introduced and announced to affected stakeholders so that they are aware of the process, know they have the right to file a complaint, and understand how the mechanism works and how their complaints will be handled. In most cases, a complaint will be submitted by a stakeholder or member of the local community via telephone, in writing, or through one of the company's designated complaint officers. Further information regarding Arslan Aluminum's complaint mechanism is provided in Section 10 of this document.

8.1 Planned Stakeholder Engagement Activities

Arslan Aluminum has published its Stakeholder Engagement Plan on its website.

Arslan Aluminum's Complaint Mechanism has been established for both internal and external stakeholders. Additionally, the procedures related to the Complaint Mechanism are outlined in the Stakeholder Engagement Plan.

Arslan Aluminum will communicate the purpose, scope, roles, and responsibilities of the Stakeholder Engagement Plan to all employees through annual training sessions.

Arslan Aluminum will send an informational email to its external stakeholders regarding the Stakeholder Engagement Plan and the Complaint Mechanism.

8 CORPORATE SOCIAL RESPONSIBILITY PROJECTS

Corporate Social Responsibility (CSR) projects are one of the most important tools implemented, particularly during stakeholder engagement activities at the corporate level. CSR initiatives ensure the company's accountability, transparency, and sustainability, while also supporting affected local communities and local government units. To date, Arslan Aluminum has undertaken the following activities:

- Arslan "Recycling Through the Eyes of Our Children" Drawing Contest

- By organizing art contests for our employees' children, we have provided art supplies to children under the age of 15 who are passionate about drawing.

- The smart bus stop project has ensured that the public can wait for public transportation in comfortable areas.

- In the medical school opening project, the design and preparation of social facilities were carried out.

- We reached out to university students through career days.

- Support was provided to local entrepreneur groups and student projects.

- A housing and accommodation support project for our employees was implemented, resulting in the completion of a 50-unit housing project. This project has now expanded to a total of 150 units.

8.1 Planned Corporate Social Responsibility Projects

- Tree Sapling Donation

To celebrate Arslan Aluminum's 75th anniversary, the company aims to make a sapling donation to the TEMA Foundation on behalf of its employees. Certificates for the donated saplings will also be presented as mementos to all employees celebrating Arslan Aluminum's 75th anniversary.

9 COMPLAINT MECHANISM

The complaint mechanism is a key component of the company's approach to meeting customer requirements regarding community engagement under the IFC Performance Standards (PS). The purpose of the Complaint Mechanism is to provide access to a resolution procedure for complaints that may arise during operations. Priority is given to those affected by the facility, including local communities and facility employees.

Complaints may serve as an indicator of growing concerns among stakeholders and may escalate if not identified and resolved. Identifying and responding to complaints supports the development of positive relationships among facility staff, local communities, and other stakeholders.

The Complaint Mechanism will ensure that complaints related to the Facility are addressed through a transparent and impartial process. From the Facility's inception, the complaint mechanism must be communicated to stakeholders through individual or group meetings, printed materials, email, and bulletin boards, and this process must continue throughout the Facility's operational lifespan.

The initial receipt of complaints will be handled by Cemre TOKU, a member of the Disciplinary and Ethics Committee. The Disciplinary and Ethics Committee Officer will be responsible for categorizing complaints under specific headings and forwarding them to the appropriate party based on the subject matter of the complaint. Detailed information regarding the Complaint Log is provided in Section 11.1.

The duration of the process of responding to or evaluating a complaint will depend primarily on the complexity of the complaint in question. However, ideally, a resolution should be reached within 6 business days from the date the complaint is forwarded to the relevant unit.

The methods used to publicize the Complaint Mechanism must be culturally appropriate and consistent with the stakeholders' general communication methods. For example, vulnerable groups and other stakeholders may access information in different ways, and equal access to information must be ensured for both groups. Throughout the facility's lifespan, stakeholders will be able to share their opinions and complaints through a variety of options, such as letters, email, suggestion/request boxes, and face-to-face meetings.

All stakeholders filing a complaint may request that their submissions be evaluated confidentially. Those responsible will ensure that the complainant's name and contact information are not disclosed without their consent.

9.1 Complaint Record

All incoming complaints will be recorded in the Complaint File and assigned a case number.

The Complaint File will be used to track the status of complaints, determine the frequency of complaints, analyze the causes of complaints, and identify common complaint topics and recurring trends.

All complaints will be recorded in the Complaint File with the following information:

- Complaint request number
- Date of the complaint
- Where and in what form the complaint was received (for suggestion/request boxes)
- The complainant's contact information (if the complaint is not anonymous)
- Content of the complaint
- Parties responsible for addressing the issue
- Dates when the investigation of the complaint began and ended
- Results of the investigation
- Information regarding the corrective actions recommended to the complainant (if the complaint is not anonymous) and the date they were sent
- Deadline for facility staff to take the necessary actions
- Information on whether the corrective action was satisfactory or if there was a reason the complaint remained unresolved
- Complaint closure
- Actions to be taken for unresolved complaint files

9.2 Roles and Responsibilities

Four distinct roles have been defined at the facility level to ensure the effective implementation of the PKP:

1- Stakeholder Engagement Plan Manager

2- Disciplinary and Ethics Committee Officer

3- Internal Stakeholder Communications Officer

4- External Stakeholder Communications Officer

The responsibilities of the managers and coordinators are listed below:

Stakeholder Engagement Plan Manager

-Responsible for stakeholder engagement processes.

-Responsible for the sustainability report.

- Manages PKP notifications, appoints new officers, or removes them from their positions. - Measures the success of the PKP and updates it as necessary.

Disciplinary and Ethics Committee Officer

-Records all complaints from internal or external stakeholders, regardless of the channel through which they are received (website, phone, in person, suggestion boxes, etc.).

-Forwards the recorded complaints to the relevant department.

-Ensures that all parties are heard.

-Communicates the outcomes of responses received from the relevant department.

- Shares the outcome of the complaint with the relevant party.

-Receives any objections regarding the outcome.

-Complaint Closure mechanism.

Internal Stakeholder Communications Officer

-Ensures internal stakeholders are aware of their rights and mechanism.

-Manages the "Worker Rights" section of the orientation training provided to internal stakeholders.

-Holds periodic meetings with internal stakeholders regarding workers' rights.

-Communicates any changes to the PKP to internal stakeholders.

Communication with Stakeholders

protects stakeholders' rights and handles complaints enables them to understand the mechanism.

-Facilitates the sharing of information with external stakeholders.

-Organizes meetings with external stakeholders.

-Facilitates communication to resolve issues when necessary.

9.3 Implementation of the Complaint Mechanism

To prioritize resolution, complaints must be reviewed as quickly as possible. Regardless of general response and resolution times, certain complaints—such as urgent safety issues or matters related to the local community's livelihoods—may require immediate intervention.

There are 10 steps that make up the Complaint Mechanism. This process is outlined in the steps listed below

:

Step 1: The identification of a complaint will be conducted using personal communication channels, based on appropriate training and briefings provided by the Disciplinary and Ethics Committee Officer.

This complaint submission may be made in person, by phone, by mail, through suggestion/request boxes, or via email.

Figure 10-1. Example of a Suggestion/Request Box at Arslan Aluminum

Step 2: The complaint will be recorded in the Complaint File within one business day of receipt. The complaint record will be managed by the assigned Disciplinary and Ethics Committee Officer

. The severity of the complaint will be assessed within the following five business days. The severity criteria are summarized in the list below.

1. Level 1 Complaint: A complaint that is isolated or “one-time” (within a specific reporting period—one year) and, by its nature, primarily local in scope.

Note: Some one-time complaints may be significant enough to be classified as a Level 3 complaint

, for example, when a national or international law has been violated (see Level 3).

2. Level Complaint: Widespread and recurring complaints (e.g., noise, dust, etc., from facilities).

3. Level Complaint: A one-time complaint or widespread and/or recurring

complaints; also, complaints resulting in serious violations of the Facility’s Policies or national legislation, complaints leading to negative national or international media attention, and complaints believed to have caused negative comments from the media or other key stakeholders (e.g., inadequate waste management)

In cases where a complaint is deemed to fall outside the scope of the Complaint Mechanism, the complainant will be notified via their preferred method of communication, and an alternative resolution will be proposed.

Step 3: Complaints are received in person, via telephone, by letter, through suggestion/request boxes, or by email or mail. The complaint process is expected to be resolved within 6 business days from the date it is forwarded to the relevant unit (excluding Level 3 Complaints that require immediate attention).

If the complaint is not fully understood or additional information is required, the complainant will be asked for clarification at this step.

Step 4: The level of the complaint is determined by the Disciplinary and Ethics Committee Authorized Representative. All Level 3 Complaints are reported to the Management Coordinator. Arslan Aluminum’s senior management supports the Disciplinary and Ethics Committee Officer in deciding who should handle the complaint based on the circumstances and consults on whether additional support is needed during the complaint resolution process.

Step 5: The Discipline and Ethics Committee Officer forwards the complaint to the relevant units. To ensure the complaint is addressed effectively, the Officer forwards it via email to the relevant department or personnel within 6 business days (e.g., Human Resources, Administrative Affairs, etc.).

Step 6: The authorized team completes the response to the complaint within 6 business days. During this process, input from the senior management of the relevant departments may be utilized as needed. The response to the complaint must include an appropriate resolution (such as taking measures to resolve the current issue or determining financial compensation to compensate for damages incurred during Facility Operations).

The analysis of a complaint involves evaluating it from various perspectives; for example, if the complaint is reported by an employee, the analysis takes into account the employee's history, the frequency of the complaint, management practices, recent developments at the workplace, etc.

Step 7: Responses to complaints are provided by the relevant units. For Level 3 complaints, the manager of the relevant department approves their closure; for Level 2 and Level 1 complaints, the Disciplinary and Ethics Committee Officer approves their closure within 14 business days at the latest. This approval may be provided via a signature or an email indicating the necessary agreement. The Disciplinary and Ethics Committee Authorized Representative completes the necessary documentation and records the data in the Complaint File.

Step 8: Communication regarding the response to the complaint must be carefully coordinated. The Disciplinary and Ethics Committee Authorized Representative ensures that an appropriate approach for conveying the response is adopted and implemented.

Step 9: The complainant's response is recorded to help assess whether the complaint has been properly closed or are required. The Disciplinary and Ethics Committee Representative uses appropriate communication channels—such as a phone call or in-person meeting—to confirm that the complainant understands the response and is satisfied with it.

If the complaint is filed anonymously, a summary of the complaint and its resolution is shared with the relevant unit manager and disseminated throughout the entire department.

If possible, the complainant’s response should be recorded in the Complaint File along with notes regarding remedial measures to prevent the complaint from recurring in the future.

If the Disciplinary and Ethics Committee Representative or other department managers determine that a complaint received through the complaint mechanism falls outside their area of responsibility, the Disciplinary and Ethics Committee Representative will provide a detailed explanation/justification regarding the situation. If the complainant does not find the response satisfactory, an additional explanation will be provided regarding how the complainant can proceed with the complaint process

Step 10: The complaint is closed with the signature of the Disciplinary and Ethics Committee Official. The Disciplinary and Ethics Committee Official decides whether a complaint can be closed or requires further investigation. If further investigation is required, the Disciplinary and Ethics Committee Official must return to Step 2 to reassess the complaint. After evaluating whether the complaint can be closed, the Disciplinary and Ethics Committee Authorized Representative approves its closure. To reach an agreement on closing Level 3 complaints, they will request signatures from the relevant departments. This agreement may take the form of a signature or an email explaining the agreement. The Disciplinary and Ethics Committee Officer completes the necessary documentation and records the data in the Complaint File.

10.3.1 Employee Complaint Mechanism

The Employee Complaint Mechanism is defined as complaints received from Facility employees (including both direct and indirect employees). This mechanism is structured to provide an effective approach for the early detection, evaluation, and resolution of complaints throughout the Facility’s lifespan. The Complaint Mechanism must guarantee that any employee filing a complaint will not be subject to any retaliation. The scope of the Employee Complaint Mechanism can be summarized as follows, without being limited to these examples

:

- occupational health and safety,
- employment conditions,
- wages,
- issues with the local community or among coworkers,
- hygiene issues in common areas,
- insufficient food and/or worker safety,
- workplace accidents
- Prevention, reduction, or management of occupational diseases and other health-related incidents

The complaint mechanism will be communicated to all employees at all facilities through written and verbal channels. Each employee will be informed about the complaint mechanism via the employee handbook upon hiring. Confidentiality is very important to some employees; therefore, employees may submit complaints anonymously. However, anonymous submissions may prevent Arslan Aluminum from resolving the issue and providing feedback. Nevertheless, Facility employees who wish to submit complaints anonymously will be permitted to do so. The Disciplinary and Ethics Committee Officer will open the suggestion/request boxes located within the facility every 5 business days and review them to determine whether the issues reported in writing fall within the scope of the Employee Complaint Mechanism. To prioritize resolution, complaints must be reviewed as soon as possible. Regardless of general response and resolution times, certain urgent complaints—such as those related to workers' livelihoods—may require immediate attention.

The steps outlined in Section 10.3 of this document also apply to the Employee Complaint Mechanism.

10 MONITORING

Stakeholder Engagement Plan monitoring methods will be applied throughout the facilities' lifetimes. The Stakeholder Engagement Plan will be reviewed annually and updated as necessary in light of facility developments and unexpected public reactions. The complaint mechanism established for the facility will be used effectively, and a statistical summary of the mechanism's outcomes will be shared with Facility Management and stakeholders.

The key performance indicators (KPIs) to be used during the implementation of the Stakeholder Engagement Plan are provided in Table 11-1 below:

Table 11-1. Key Performance Indicators (KPIs) and Monitoring Activities – Stakeholder Engagement

No	KPI	Target	Monitoring Method
1	Number of External Stakeholder Complaints	0	Database
2	Number of Complaints on Similar Issues	0	Database
3	Number of complaints resolved within the targeted monthly timeline	Target: 90%	Database
4	Response Time for Complaints	Non-Level 3 14-day calendar days Level 3 Level Possible	Database
5	Providing feedback to stakeholders on the implementation of the complaint mechanism	100%	Reporting