



ARSLAN
ALÜMİNYUM
A.Ş.
PRODUCTION FACILITIES

STAKEHOLDER
ENGAGEMENT
PLAN (SEP)

July
2024
BİLECİK

ARSLAN ALÜMİNYUM

A.S.

PRODUCTION FACILITY

STAKEHOLDER

ENGAGEMENT PLAN

(SEP)

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July 2024

BİLECİK

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ABBREVIATIONS

KSP	Corporate 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 Engagement Plan
KSP	Corporate Responsibility Projects

1 INTRODUCTION

This plan presents the Stakeholder Engagement Plan (SEP) for Arslan Alüminyum A.Ş. Turkey and has been prepared by "Arslan Alüminyum A.Ş." (here in after referred to as "Arslan Alüminyum").

The purpose of the Stakeholder Engagement Plan is to provide guidance to the Facility management on the following issues:

- Establish and maintain a constructive relationship with stakeholders, especially communities affected by the facilities,
- Improve the environmental and social performance of the facility through effective stakeholder engagement,
- Ensure that relevant environmental and social information is made available to all stakeholders throughout the life of the Facilities and encourage stakeholder engagement with communities affected by the Facilities,
- Providing all stakeholders with access to information and enabling them to raise potential issues
- Paving the way for transparent and participatory communication in line with sustainability principles,
- Ensure that groups affected by Facility Activities have access to appropriate communication channels to raise potential issues and grievances, and to respond appropriately to these issues and grievances, helping to manage the process successfully.

This Stakeholder Engagement Plan includes:

- Identification of stakeholders for facilities,
- Analysis of stakeholders' relations with the Facilities,
- Detailed consultation methodologies,
- Activities carried out to date and planned for the future,
- Stakeholders' concerns details the process for managing

grievances and complaints and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

2 ABOUT ARSLAN ALÜMİNYUM

Arslan Alüminyum combines its know-how in production with product development techniques. and offers its high quality products to the market.

Arslan Alüminyum is one of the most important industrial enterprises in Turkey and exports to more than 50 countries. Arslan Alüminyum combines its know-how in Aluminum billet casting and extrusion profile production with advanced design and product development techniques and offers its high quality products to the market under its own brand.

The facilities have ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO 27001, EN 15088, TSE and QUALANOD-QUALICOAT quality certificates in accordance with international norms and standards.

- 3pcs Casthouses, 9pcs extrusion presses, recycling billet and profile production.
- Anodized Coating
- 2500000 kg/month capacity vertical paint

Arslan Alüminyum has 4 production facilities in Bilecik first and second OIZs. The open area of the existing facilities is 350000 m² and the closed area is 130000 m². Although it varies on a daily basis, there are currently 700 people working at Arslan Alüminyum . In the existing facilities, employees are provided with dining hall, toilet, dressing room, prayer area, and resting areas.

Summary information about the employees of Arslan Alüminyum is given below:

CITY	NUMBER OF PERSONS
Bilecik	665
Istanbul	21
General Total	686

COLLAR	MALE	WOMAN	General Total
White Collar	82	40	122
Blue Collar	407	157	564
General Total	474	191	686

Engei Status	Male	Woman	General Total
Disabled	18		18

Employee benefits:

For our employees, an annual salary bonus, fuel allowance, child allowance, annual foreign language training allowance for engineers, cash holiday aid before religious holidays and food aid before holidays, New Year's Eve food aid are provided.

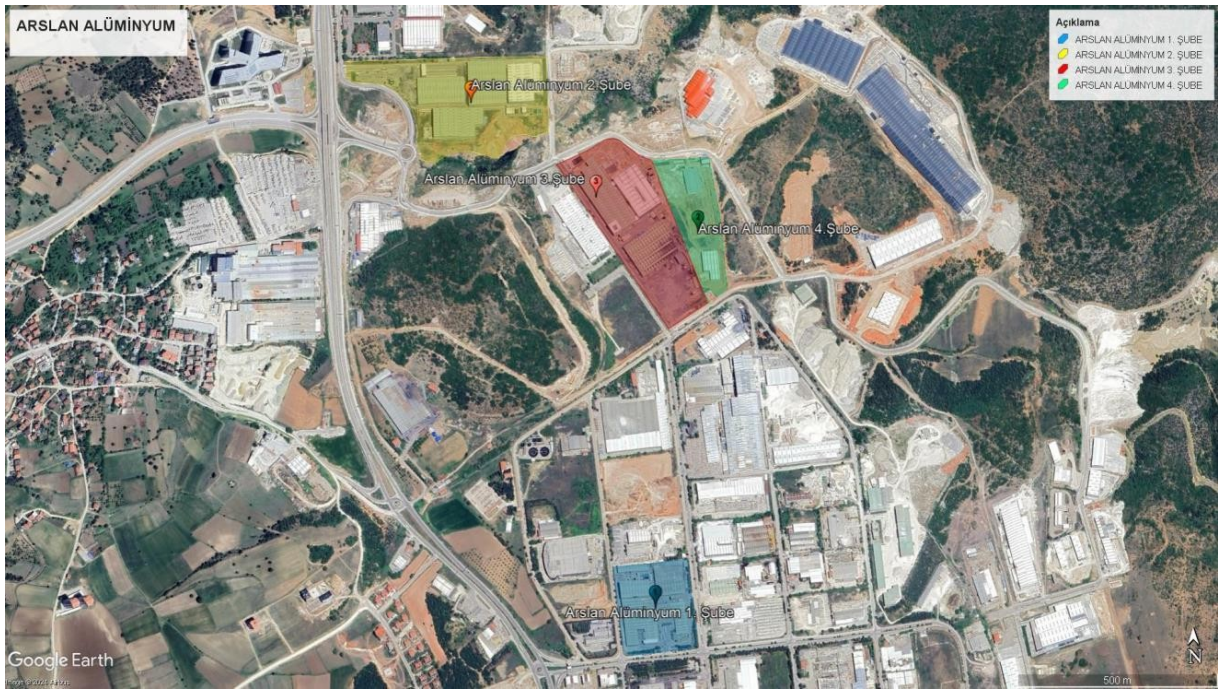
Lodging support is being provided...

Arslan Alüminyum wants to improve the environmental and social performance of the plant and requires proof of this. In line with IFC Performance Standards, this Stakeholder Engagement Plan has been prepared. It is aimed to conduct effective and inclusive consultations and maintain an efficient stakeholder engagement process throughout the life of the Facility Operations.

3 ARSLAN ALÜMİNYUM CAMPUS

Arslan Alüminyum's facilities are located in Bilecik province. Figure 3-1 below shows the location of the Facilities.

Figure 3-1. Location of Facilities



4 LEGISLATION REQUIREMENTS

This section describes the Project's stakeholder engagement activities in line with national and international requirements.

It outlines how to organize its activities

4.1 Turkish Legislation

"Regulation on Environmental Impact Assessment (No. 29186 dated November 25, 2014 and amended on May 26, 2017; No: 30077)" It defines the administrative and technical procedures and principles to be followed during the EIA process. According to the EIA Regulation, a Public Participation Meeting (PPM) is not required for the Project as per Article 24 of the Regulation. A special version of the PQM within the scope of the Regulation is presented.

Table 4-1. National Legislation

NATIONAL LEGISLATION	
Environmental Impact Assessment	
Turkish Environmental Law	Official Gazette No: 2872; Date of publication: 1983
Environmental Impact Assessment Regulation	Official Gazette No. 31907, Date: 29.07.2022
SU	
WaterPollutionControlRegulation	Official Gazette No. 25687 Date: 31.12.2004 (Amended: 32188
Law on Groundwater	Official Gazette No: 167, Published: 1960
Air	
Regulation on Control of Industrial Air Pollution	Official Gazette No. 27277 Date: 03.07.2009 (Amendment No: 31296
Air Quality Assessment and Management Regulation	Official Gazette No. 26898 Date: 06.06.2008
Odor Generating Emissions Regulation on Control	Official Gazette No. 28712 Date: 19.07.2013
Monitoring Greenhouse Gas Emissions Regulation on	Official Gazette No. 29003 Date: 17.05.2014 (Amendment No: 30082Date:
Floriu Regulation on Greenhouse Gases	Official Gazette No: 31881 Date: 29.06.2022
Environmental Permit and License Regulation	Official Gazette No. 29115 Date: 10.09.2014 (Amendment No: 32113, Date: 23.02.2023)
Exhaust Gas Emission Control Regulation	Official Gazette No. 30004 Date: 11.03.2017 (Amendment No: 31463, Date: 23.04.2021)

Regulation on Pollutant Release and Transport Registration	Official Gazette No. 31679 Date: 04.12.2021
No. 5403 Soil Conservation and Land Utilization Law (Legal Law No. 6537)	Official Gazette No. 25880 July 03, 2005
Control of Soil Pollution and Point Source Contaminated Sites	Official Gazette No: 27605, Date: 08.06.2010 (Amendment No: 28704, Date: 11.07.2013)
Noise	
Environmental Noise Control Regulation	Official Gazette No. 32029 Date: 30.11.2022
Noise Protection of Buildings Regulation on	Official Gazette No. 30082, Date: 31.05.2017

Waste	
Waste Management Regulation	Official Gazette No. 29314 Date: 02.04.2015 (Amendment No: 30016, Date: 23.03.2017)
Waste Oil Management Regulation	Official Gazette No. 30985 Date: 21.12.2019 (Amendment No: 3207, Date: 12.01.2023)
On the Landfill of Wastes Regulation	Official Gazette No. 27533 Date: 26.03.2010 (Amendment No: 31876 Date: 24.06.2022)
Waste Electrical and Electronic Equipment Regulation on Management	Official Gazette No. 32055 Date: 26.12.2022
Regulation on Vegetable Waste Oil Control	Official Gazette No. 29378 Date: 06.06.2015
Regulation on Control of Packaging Waste	Official Gazette No. 31523 Date: 26.06.2021
Regulation on Recycling Contribution Fee	Official Gazette No. 30995 Date: 31.12.2019 (Amendment No: 32481 Date: 06.03.2024)
Regulation on Control of Medical Waste	Official Gazette No. 29959 Date: 25.01.2017 (Amendment No: 31927, Date: 18.08.2022)
Regulation on Control of End-of-Life Tires	Official Gazette No. 26357 Date: 25.11.2006 (Amendment No: 29292 Date: 11.03.2015)
Regulation on Control of Waste Batteries and Accumulators	Official Gazette No. 25569 Date: 31.08.2004 (Amendment No: 29214, Date: 23.12.2014)
Zero Waste Regulation	Official Gazette No: 30829 Date: 12.07.2019 (DeğişiklikNo:31623Tarih:09.10.2021)
Chemical	
Registration, Evaluation, Authorization and Regulation on Restriction of	Official Gazette No: 30105 Date: 23.06.2017 (DeğişiklikNo:32408Tarih:23.12.2023)
Regulation on Persistent Organic Pollutants	Official Gazette No: 30595 Date: 14.11.2018 (Amendment No: 31434 Date: 25.03.2021)
Exports and Imports of Some Harmful Chemicals Regulation on	Official Gazette No: 32087 Date: 28.01.2023
Regulation on Prevention and Mitigation of Major Industrial Accidents	Official Gazette No: 30702 Date: 02.03.2019
Geology and Seismology	
On Structures to be Built in Disaster Areas Regulation	Official Gazette No. 26582 Date: 14.07.2007
Work and Working Conditions	
Occupational Health and Safety Law	Law No: 6331, Approval Date: 2012
Employer Regulation	Official Gazette No. 27010 27 September 2008
Labor Law (No. 4857)	Official Gazette No. 25134 June 10, 2003
Stakeholder Engagement	
Right to Information (No. 4982)	Official Gazette No: 25269 Date: 24.10.2003

4.2 International Standards

This report is guided by relevant IFC Performance Standards and international requirements. IFC is an international financial institution that provides advisory and asset management services to help organizations develop and implement environmental and social management systems to improve their operations. It was established in 1956 as the private sector arm of the World Bank Group to reduce poverty and promote development and to advance economic development by investing in commercial projects. To provide a way to manage social and environmental risks and impacts on projects

Sustainability Performance Standards were established and updated in 2012. The Performance Standards are designed to help prevent, mitigate and manage risks and impacts as a way of doing business in a sustainable manner, including the client's obligations to engage stakeholders and share information in relation to project-level Activities. In other words, IFC applies the Sustainability Framework in conjunction with its other strategies, policies and initiatives to guide its business activities to achieve the overall development goal. The Performance Standards may also be applied by other financial institutions.

During the course of IFC's investment, the following eight Performance Standards were met must implement it:

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

Performance Standard 2: Work and Working Conditions Efficiency and Pollut Performance
Standard 3: Resource ion Prevention

Performance Standard 4: Public Health, Safety and Safety

Performance Standard 5: Land Acquisition and Compulsory Resettlement

Performance Standard 6: Conservation of Biodiversity and Sustainable Management of Living Natural Resources

Performance Standard 7: Indigenous

Standard 8 : Cultural Heritage

The IFC guidelines under the Project to be followed during this study are as follows:

- IFC General EHS Guidelines dated April 30, 2007,
- IFC Performance Standards Environmental and Social Management System Implementation Manual
Book Metal Products Manufacturing

5 DUTIES and RESPONSIBILITIES

Arslan Alüminyum follows different methods to monitor its compliance with Turkish legislation and to monitor changes. Specialized personnel, ISO 14001 certification, corporate relations and legal consultancy are among the tools used to monitor legislation. In-house trainings are organized to inform employees on these issues. These trainings include topics such as sustainability, water scarcity, combating climate change and adaptation, gender equality, inclusion, energy management, waste storage, carbon emissions and OHS standards.

Arslan Alüminyum is a member of the International Finance Corporation (IFC) Environmental and Human and labor rights in line with Social Sustainability Performance Standards on the issue of stakeholders. For this reason, it has identified internal and external stakeholders. Internal stakeholders include all workers within the company, while external stakeholders are residents of nearby settlements, government agencies, subcontractors, suppliers and customers, and NGOs. Stakeholders are listed in Chapter 6

Harun CAN, R&D and Quality Assurance Manager, has been assigned as the Stakeholder Engagement Plan Manager for the audit of compliance with the social parts of IFC Performance Standards within Arslan Alüminyum. Stakeholder identification, communication methods and performance audits are included in the following sections.

Facility Management will ensure that all affected parties are informed about the Facility, in particular affected settlements, local communities, neighboring facilities and surrounding government agencies. These groups will be involved in the process of identifying important issues within the Facility. The roles and responsibilities defined to conduct effective stakeholder engagement at the Facility are listed in the table below:

Table 5-1. Main Duties and Responsibilities

<p>Board of Directors</p> <p>Ensures the implementation of the Stakeholder Engagement Plan</p>
<p>Stakeholder Engagement Plan Manager</p> <p>Ensures the implementation of the Stakeholder Engagement Plan</p> <p>Provides the necessary resources for the effective implementation of this plan</p>
<p>Stakeholder Engagement Plan Officers</p> <p>Implementation and development of the Stakeholder Engagement Plan</p> <p>Identifying the resources required for the effective implementation of the Stakeholder Engagement Plan and presenting it to department managers .Assessing the compliance of Facility Operations with national and international legislation .Developing and publicizing Grievance Management procedures .Collecting complaints from local communities, the public, NGOs and related groups as the contact person.</p> <p>Forwarding incoming complaints to the relevant parties, receiving, examining, investigating and investigating complaints</p> <p>Directing incoming complaints to the relevant units for resolution</p> <p>Fulfillment and monitoring of the arrangements under the grievance procedure and evaluation.</p> <p>Regular review of the Grievance Mechanism as a result of changes in employment legislation and lessons learned from the operation of the Facilities</p>

Stakeholder Engagement Plan Officers:

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

Disciplinary and Ethics Committee Officer: Pinar ARSLAN

Responsible for Communication with External Stakeholders: Hüseyin MAZLUMOĞLU

Responsible for Communication with Internal Stakeholders: Ahmet FIDAN

6 FACILITY STAKEHOLDERS

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

Participation of disadvantaged and vulnerable groups affected by the Project in the stakeholder engagement process

to be aware that they may have difficulties and to **make a special effort** to overcome this problem

should be identified. When identifying a stakeholder, the Stakeholder Engagement Plan takes into account that this person or group may be directly or indirectly affected by the Project. It also includes other individuals and groups with an interest in or influence on the Project.

The stakeholder identification process continues throughout the life of the Project. It needs to be reviewed and updated regularly. As stakeholder identification is a continuous process, different stakeholders are involved in the Project on different issues. Therefore, stakeholders can be categorized according to their connection to the Project. Understanding how a stakeholder group relates to the Project helps to identify the key objectives of stakeholder engagement. Table 6-1 shows the stakeholders interested and affected by the Project.

According to the IFC Handbook, stakeholders are "those who are directly or indirectly affected by a project, as well as individuals or groups who may positively or negatively affect its production". Stakeholder engagement criteria vary for each project. Many factors such as the location of the project/facility, the cultural characteristics of the location, the field of activity of the facility, etc. appear as criteria in stakeholder identification.

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 initial stakeholders over the life of the facility.

External stakeholders such as suppliers, contractors, customers, local administrations, state institutions, vocational schools, OSB management, non-governmental organizations, certification bodies, academic communities and neighboring facilities should also be identified as stakeholders of the Facilities. Arslan Alüminyum will have an obligation to announce all activities concerning its stakeholders throughout the life of the plant. As a dimension of the principle of human rights, external will respond to complaints, suggestions and requests for information.

Internal stakeholders include all employees at all levels working in the facility. Arslan Aluminum has certain responsibilities towards all its employees These responsibilities start with fully implementing what is written in Turkish legislation.

In addition, treating all employees fairly, ensuring sustainable improvement of the employee management relationship, and protecting vulnerable groups such as child and migrant workers, safe and healthy develops behaviors such as creating working conditions and avoiding issues such as drudgery/forced labor. Along with these principles, which include human and labor rights, it will also demand and ensure supervision from the companies it does business with

Arslan Alüminyum will establish a mechanism to enable the participation of all stakeholders and will use all possible communication channels to announce this. However, it is still not possible to reach all stakeholders equally. The point that should not be overlooked in this regard is to reach people belonging to vulnerable groups. Arslan Aluminum will carry out studies to identify vulnerable groups.

Stakeholder engagement of disadvantaged and vulnerable groups affected by Facility Activities

It is important to recognize that a stakeholder may find it difficult to be involved in the process and to make a special effort to overcome this situation. When identifying a stakeholder, the Stakeholder Engagement Plan takes into account that this person or group may be directly or indirectly affected by the Facility. In addition, other individuals and groups that have an interest in or influence on the Facilities are also included.

The stakeholder identification process continues throughout the life of the Facility. It needs to be regularly reviewed and updated. As stakeholder identification is a continuous process, different stakeholders are involved in different issues. Therefore, stakeholders can be categorized according to their connection to the Facility. Understanding a stakeholder group's connection to the Facility helps to identify the key objectives of stakeholder engagement.

Table 6-1 shows the stakeholders interested and affected by the Facility.

Table 6-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested in
People		
<ul style="list-style-type: none"> • Vocational High Schools • Neighborhood in Bilecik 1st and 2nd OSB 	√	√
Education Units		
<ul style="list-style-type: none"> • Bilecik Şeyh Edebali University 	√	√
Public Administration Units		
<ul style="list-style-type: none"> • Ministry of Energy and Natural Resources • Ministry of Labor and Social Security • Bilecik Merkez District Governorship • Bilecik Governorship • Bilecik Governorship Provincial Directorate of Environment, Urbanization and Climate Change • Bilecik Chamber of Commerce and Industry 	√	√
Municipalities		
<ul style="list-style-type: none"> • Bilecik Municipality 	√	√
	√	√
Internal Stakeholders		
Arslan Alüminyum 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 for stakeholder engagement under the Facilities. In order to ensure efficient and effective stakeholder engagement throughout the life of the Facilities, new mechanisms will be incorporated as deemed appropriate, in addition to the already established communication mechanisms.

The methods used to communicate with stakeholders are presented below:

- Formal and informal face-to-face meetings (individual and collective) - will be the primary form of consultation throughout the life of the Facility. This includes stakeholder meetings scheduled by the Facility or requested by stakeholders.
- Arslan Alüminyum website (www.arslanaluminyum.com - public announcements, documents, reports, management plans, etc.)
- Grievance mechanism - specifically targeted at directly affected stakeholders. In question The details of the mechanism are detailed in Article 10 of this document.
- Media promotions - invitations to attend meetings, information sharing, etc.

8. STAKEHOLDER ENGAGEMENT ACTIVITIES

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

Information to be shared through the implementation of this report will include (but not limited to) the following:

- Impacts identified as occurring after the start of implementation of the report,
- Implementation impacts of the report and the compensation or remediation methods being implemented,
- Duties and Responsibilities,

Monitoring and management methods,

- Information on the grievance mechanism

The following measures will be taken into account to ensure effective stakeholder engagement:

- Stakeholder Engagement Plan will be communicated to all stakeholders,
- The Stakeholder Engagement Plan will be reviewed annually by the responsible manager,
- Arslan Alüminyum will take this plan into account when communicating with affected stakeholders and other relevant parties.

The Facility's Stakeholder Engagement Plan focal points will be responsible for engaging with stakeholders as an ongoing process throughout the life of the Facility. Grievances can be an indicator of growing stakeholder concerns (real and perceived) and may increase if not identified and resolved. Identifying and addressing grievances will support the development of positive relationships between the Facilities and stakeholders in the area of influence.

Arslan Alüminyum has established an internal Grievance Mechanism. This will provide a formal and continuous way for stakeholders to interact with the Facility. With the implementation of this plan, this formal grievance mechanism, which is free of charge for internal/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 opinions through a range of options such as Arslan Alüminyum's website, e-mail and face-to-face meetings.

share their complaints. There are suggestion/request boxes in various parts of the campus where complaints and suggestions are indicated. In addition, an e-mail address "etik@arslanaluminum.com" has been created for stakeholders to report their complaints if they prefer. Complaints must be responded to within 6 working days from the date of submission to the relevant unit.

Within the scope of the "open door policy" implemented, employees are encouraged to contact any senior

employees will be able to communicate their complaints and suggestions directly without applying to a manager. This policy encourages employees to express their views and opinions on legal, ethical and business quality issues and to voice their complaints.

Stakeholder Engagement Monitoring Program,

can be developed according to Arslan Alüminyum's needs as shown in the table below.

Table 8-1. Stakeholder Engagement Monitoring Program

Stakeholder Groups	Scope	Frequency	Methods and Tools
<p>Surrounding Settlements</p> <ul style="list-style-type: none"> • Vocational High Schools • 1st and 2nd OIZ • Neighboring Properties • University 	<ul style="list-style-type: none"> • Recruitment Process • Social Responsibility Projects • On request Facility <p>Activities and progress updating</p> <ul style="list-style-type: none"> • Public Complaints, demands and back about notifications explanatory meetings 	Annual As Needed	<p>Website</p> <p>E-mail notifications</p> <p>Phone Calls</p>
<ul style="list-style-type: none"> • Public Institutions • Energy and Sure. Ministry of Resources • Labor and Social Security Ministry of • Bilecik Governorship • Bilecik Governorship Environment, Urbanization and Climate Change Province Directorate of • Bilecik Trade and Chamber of Industry • Industry and Technology Ministry of • Turkish Employment Agency (İŞKUR) • OIZ directorates 	<p>Regulation of</p> <ul style="list-style-type: none"> • On request Facility <p>Activities and progress update</p> <ul style="list-style-type: none"> • Public complaints, demands and back about notifications explanatory meetings <p>Regulation of</p> <ul style="list-style-type: none"> • Local procurement and employment data. 	<p>Annual</p> <p>In Case of Need</p>	<p>Website</p> <p>E-maii information</p> <p>Phone Calls</p>

Municipalities • Bilecik Municipality	<ul style="list-style-type: none"> • On request Facility Activities and progress update • Public Complaints, demands and back about the information explanatory meetings 	Annual In Case of Need	Website E-mai information Phone Calls
Facility Employees	<ul style="list-style-type: none"> • Facility monthly control of the implementation of the Grievance Mechanism in the field of 	Ongoing	Request/Suggestion boxes Information boards All employees email etik@arslanaluminyum.com) Arslan
Customers	<ul style="list-style-type: none"> • Demand In case of Facility Activities an d updating its progress 	Ongoing	Website e-mail notifications Phone Calls Website
Contractors/Subcontractors/ Suppliers/NGOs/	<ul style="list-style-type: none"> • Demand In case of Facility Activities and updating progress • Local purchasing and employment data. 	Ongoing	E-mai information Phone Calls
Certification organizations	<ul style="list-style-type: none"> • On request Facility Activities and progress update 	Ongoing	Website E-mai information Phone Calls
Vulnerable groups	<ul style="list-style-type: none"> • Facility in the field of Grievance Mechanism applications monthly control 	Ongoing	Request/Suggestion boxes Information boards To all employees email etik@arslanaluminyum.com Arslan Alüminyum website

The grievance mechanism will be managed by Hüseyin MAZLUMOĞLU, External Stakeholder Liaison Officer, who is the primary interface between the public and Arslan Alüminyum. Confidentiality procedures will be implemented to protect the complainant appropriately.

They should be aware of the grievance mechanism process, that they have the right to file a complaint to know, mechanism How that it's going to work and Complaints How will be introduced and publicized to affected stakeholders so that they understand how it will be handled. In most cases, a grievance will be submitted by a stakeholder or local community by phone, in writing or through one of the company's grievance officers. More information on Arslan Alüminyum's grievance mechanism is provided in Section 10 of this document.

8.1 Planned Stakeholder Engagement Activities

Arslan Alüminyum shared its Stakeholder Engagement Plan on its website.

Arslan Alüminyum Grievance Mechanism has been established for internal and external stakeholders. In addition, practices related to the Grievance Mechanism are explained in the Stakeholder Engagement Plan.

Arslan Alüminyum informs all its employees about the purpose, scope, duties and responsibilities of the Stakeholder Engagement Plan.

responsibilities through annual trainings.

Arslan Alüminyum will send an informative e-mail to its external stakeholders about the Stakeholder Engagement Plan and Grievance Mechanism for external stakeholders.

9 CORPORATE SOCIAL RESPONSIBILITY PROJECTS

Corporate Social Responsibility (CSR) Projects are one of the most important tools applied during stakeholder engagement activities, especially at the Corporate level. CSRs ensure the accountability, transparency and sustainability of the company, as well as supporting the affected local communities and local government units. Arslan Alüminyum has undertaken the following activities to date:

- Recycling through the Eyes of Arslan Children Painting Contest
- Painting competitions were organized for the children of our employees, and painting materials were provided to children under the age of 15 who are passionate about painting.
- With the smart bus stops project, the public can wait for transportation vehicles in comfortable areas provided.
- Design and preparation of social facilities in the project of opening a medical faculty carried out.
- University students were reached through career days.
- Support was provided to local entrepreneurial groups and student projects.
- Housing for our employees and accommodation support project and a project of 50 apartments This project has reached a total of 150 apartments.

9.1 Corporate Social Responsibility Projects Planned to be Realized

- Sapling Donation

Donation of saplings to TEMA Foundation on behalf of employees to celebrate Arslan Alüminyum's 75th anniversary

is aimed to be done. The certificates of the donated saplings will also be sent to Arslan Alüminyum

75th anniversary will be presented as a memento to all employees celebrating their 75th anniversary.

10 COMPLAINT MECHANISM

The grievance mechanism is an important part of IFC's approach to the requirements for community engagement by clients under the IFC Performance Standards (PS). The purpose of the Grievance Mechanism is to provide access to a resolution procedure for grievances that may arise during Operations. Priority is given to those affected by the Facility, including the community in the impact area and facility staff.

Grievances can be an indicator of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Facility staff, local communities and other stakeholders.

The Grievance Mechanism will ensure that Grievances related to the Facility are addressed through a transparent and impartial process. From the inception of the Facility, the grievance mechanism should be shared with stakeholders through individual or group meetings, printed materials, e-mail, notice boards and this process should continue throughout the life of the Facility.

The first acceptance of the complaints will be made by the Disciplinary and Ethics Committee Officer Pinar ARSLAN. The Disciplinary and Ethics Committee Officer will be responsible for classifying the complaints according to certain headings and forwarding them to the relevant person according to the subject of the complaint. Detailed information on the Complaint Register is provided in Section 11.1.

The length of time it takes to respond to or assess a complaint will depend mainly on the complexity of the complaint. Ideally, however, a resolution should be reached within 6 working days from the date of submission to the relevant unit at the latest.

The methods used to publicize the Grievance Mechanism should be culturally appropriate and in line with the way stakeholders are generally informed. For example, vulnerable groups and other stakeholders may access information differently and both groups need to have equal access to information. Stakeholders will be able to share their views and Grievances through a range of options such as letters, emails, suggestion/request boxes and face-to-face meetings throughout the life of the Facilities.

All stakeholders filing a complaint may request that their complaint be treated confidentially. Those responsible will ensure that the name and contact details of the complainant are not disclosed without their consent.

10.1 Complaint Record

All incoming Complaints will be assigned a request number and recorded in the Complaint File. The Grievance File will be used to monitor the status of the grievance, identify the frequency of occurrence of the grievance, analyze the causes of the grievance, identify common grievance issues and recurring trends.

All Complaints will be recorded in the relevant 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)
- Contact information of the complainant (in case of anonymous complaints)
- Content of the complaint
- Parties responsible for addressing the issue
- Dates when the investigation of complaints began and ended
- Results of the investigation
- Information on the corrective actions proposed to be sent to the complainant (non-anonymized in this case) and the date of submission

- End date of work for actions required by the staff of the facilities
- Information on whether the corrective action was satisfactory or whether there was a reason why the complaint was not resolved

- Complaint closure
- Actions to be taken for unclosed complaint files

10.2 Duties and Responsibilities

For the effective implementation of the SEP, 4 different tasks have been defined for the facility:

- 1- Stakeholder Engagement Plan Manager
- 2- Disciplinary and Ethics Committee Officer
- 3- Internal Stakeholder Liaison Officer
- 4- Communication Officer with External Stakeholders

The duties of managers and supervisors are listed below:

Stakeholder Engagement Plan Manager

- Responsible for stakeholder engagement processes.
- Responsible for the sustainability report.
- Manages SEP notifications, appoints or dismisses new officers. - Measures the success of the SEP and updates it when necessary.

Disciplinary and Ethics Committee Officer in Charge

Records all complaints from internal or external stakeholders, regardless of the channel they come from (website, telephone, face-to-face, boxes, etc.).

- Redirects the recorded complaints to the relevant unit.
- Ensures that the parties are heard. -Explains the results about the returns from the relevant unit.
- Shares the outcome of the complaint with the person concerned.
- Receives objections about the result.
- Manages the complaint closure mechanism

Internal Stakeholder Communication Officer

- Ensures that internal stakeholders know their rights and recognize the grievance mechanism. -Manages the Workers' rights part of orientation trainings given to internal stakeholders.
- Conducts periodic meetings with internal stakeholders on labor rights.
- If changes are made to the SEP, this is communicated to internal stakeholders.

Communication Officer with External Stakeholders

- Ensures that external stakeholders know their rights and recognize the grievance mechanism. -
- Organizes external stakeholder meetings. Ensures that information is shared with external stakeholders.
- Communicates to solve problems when necessary.

10.3 Implementation of the Grievance Mechanism

Complaints should be investigated as soon as possible to prioritize resolution. Notwithstanding the overall response and resolution timescales, some Complaints of importance, such as an urgent security issue or issues relating to the livelihoods of local people, may require urgent attention.

There are 10 steps that complement the Grievance Mechanism. This process is as follows is explained in steps:

Step 1: Identification of the grievance will be done through personal communication channels based on appropriate training and information provided by the Disciplinary and Ethics Committee Officer.

This complaint can be lodged in person, by telephone, letter, suggestion/request boxes or e-mail.



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

Step 2: The registration of the grievance in the Grievance File will be done within one working day after the receipt of the grievance. The complaint register will be managed by the designated Disciplinary and Ethics Committee Officer. Significance of the complaint more will be evaluated within the next five working days. The significance criteria are summarized in the list below.

1. Level Complaint: individual or "one-off" (specific reporting period within one year) and a complaint that is essentially local.

Note: Some one-off Complaints may be significant enough to be considered a Level 3 complaint, for example when a national or international law has been violated (see Level 3).

2. Level of Complaint: Common and repeated Complaints (e.g. noise from facilities, dust, etc.).

3. Level Complaint: A one-off complaint or a common and/or repeated complaint

Grievances; also grievances that result in serious violations of the Facility's Policies or national legislation, grievances that result in negative national/international media attention, grievances that are perceived to result in negative comments from the media or other key stakeholders (e.g. poor waste management)

where a grievance is considered outside the scope of the Grievance Mechanism, the grievance

The preferred method of communication will be notified to the other party and an alternative solution will be proposed.

Step 3: Acknowledgment of the grievance is made by face-to-face or phone call, letter, suggestion/request boxes and e-mail, postal mail. The grievance process is expected to be resolved within 6 working days from the date of submission to the relevant unit at the latest (Level 3 requiring immediate attention

Except for complaints).

If the complaint is not well understood or if additional information is required, this step requires clarification from the complainant will be requested.

Step 4: The level of the grievance is determined by the Disciplinary and Ethics Committee Mandate i. All Level 3 Complaints are reported to the Management Coordinator. Arslan Alüminyum's top management,

support the Disciplinary and Ethics Committee Officer in deciding who should handle the complaint on a case-by-case basis and consult whether additional support is needed in the process of closing the complaint.

Step 5: The Disciplinary and Ethics Committee Officer directs the grievance to the relevant departments. In order to ensure an effective response to the complaint, he/she forwards the complaint to the relevant department/staff via e-mail within 6 working days (e.g. human resources, administrative affairs, etc.).

Step 6: The response to the grievance is completed by the authorized team within 6 working days. During this process, it can also be used with input from the senior management of the relevant departments, if necessary. The response to the grievance must include an appropriate remedy (taking measures to remedy the existing problem or determining financial compensation to compensate for damages incurred during Facility Operations).

Grievance analysis involves assessing the grievance from a variety of perspectives; for example, if the grievance is reported by the employee, it is analyzed taking into account the employee's background, the frequency with which the grievance arises, management practices, recent developments in the workplace, etc.

Step 7: Responses to complaints are given by the relevant departments. Level 3 Complaints are approved for closure by the manager of the relevant department, Level 2 and Level 1 Complaints are approved for closure by the Disciplinary and Ethics Committee Officer within 14 working days at the latest. This approval may be by a signature or an email indicating the required agreement. The Disciplinary and Ethics Committee Officer makes the necessary filings and records the data in the Complaint File.

Step 8: Communication for the response to the complaint should be carefully coordinated. The Disciplinary and Ethics Committee Authority shall ensure that an appropriate approach to communicating the response is agreed and implemented.

Step 9: Determine whether the complaint has been closed correctly or whether further action should be taken

The complainant's response is recorded to help assess whether it is needed. The Disciplinary and Ethics Committee Officer will use appropriate communication channels, either by telephone or in person, to confirm whether the complainant has understood and is satisfied with the response.

In case the complaint is made anonymously, a summary of the complaint and the solution is shared with the relevant unit manager and communicated to the entire department.

If possible, the complainant's response should be accompanied by a remedy to prevent future recurrence of the complaint.

should be recorded in the Complaint File, together with notes on the methods used.

In the event that the Disciplinary and Ethics Committee Officer or other departmental managers find a complaint received through the grievance mechanism to be outside their area of responsibility, the Disciplinary and Ethics Committee Officer shall provide a detailed report on the situation in question.

will provide an explanation/justification. If the complainant finds the response unsatisfactory, an additional explanation will be provided on how the complainant can continue the complaint process

Step 10: The complaint is closed with a signature of the Disciplinary and Ethics Committee Officer. The Disciplinary and Ethics Committee Officer decides whether a complaint can be closed or whether it needs further investigation. If further investigation is required, the Disciplinary and Ethics Committee Officer should return to Step 2 to re-evaluate the complaint. After considering whether the complaint can be closed, the Disciplinary and Ethics Committee Officer will approve the closure of the complaint. In order to reach an agreement for the closure of Level 3 Complaints, he/she will request signatures from the relevant departments. Such agreement may be by a signature or an email explaining the relevant agreement. The Disciplinary and Ethics Committee Officer makes the necessary filings and records the data in the Complaint File.

10.3.1 Employee Grievance Mechanism

The Employee Grievance Mechanism is defined as Grievances received from Facility employees (including both direct and indirect employees). This mechanism is structured to be an effective approach for early identification, assessment and resolution of Grievances throughout the life of the Facility. The Facility shall ensure that any employee filing a

Step 9: Determine whether the complaint has been closed correctly or whether further action should be taken

- occupational health and safety,
- conditions of employment,
- Fees
- problems with the local community or among colleagues,
- hygiene problems in common areas,
- insufficient quantities of food and/or safety of workers
- work accidents
- Prevention, reduction or mitigation of occupational diseases and other health-related incidents
management

The Grievance Mechanism will be communicated to all Facilities' employees through written and verbal communication. Each employee will be informed about the grievance mechanism at the time of hire through the employee handbook. Confidentiality is very important for some employees; therefore, employees may submit their complaints anonymously. However, anonymous applications may prevent Arslan Alüminyum from resolving the issue and providing feedback. Nevertheless, Plant workers who wish to submit grievances anonymously will be allowed to do so. The Disciplinary and Ethics Committee Officer will open the suggestion/request boxes located within the facility every 5 working days and evaluate the issues submitted in writing to determine whether they fall within the scope of the Employee Grievance Mechanism. Grievances should be reviewed as soon as possible to prioritize resolution. Notwithstanding the general response and resolution timescales, some important grievances, e.g. issues relating to workers' livelihoods, may require immediate attention.

The steps in Article 10.3 of this document also apply to the Employee Grievance Mechanism.

11 MONITORING

Stakeholder Engagement Plan Monitoring methods will be applied throughout the life of the Facilities. The Stakeholder Engagement Plan will be reviewed annually and updated as necessary based on Facility developments and unexpected reactions from the public. The grievance mechanism established for the Facility will be used effectively and a statistical summary of the outputs of the grievance mechanism will be shared with Facility Management and stakeholders.

The key performance indicators to be used during the implementation of the Stakeholder Engagement Plan are given 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 responded to within the targeted one-month timeline	Target 90%	Database
4	Duration of Responses to Complaints	Non level 3 14 for complaints calendar days. 3. As soon as possible for Level 3 Complaints	Database
5	Complaint Implementation feedback Mechanism to be found. to stakeholders on	%100	Reporting