

Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.

(ATAŞ - the Eurasia Tunnel Operation, Construction and Investment Inc. Co.)

Eurasia Tunnel Project
Stakeholder Engagement Plan
(SEP) for Operation Period

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Table of Contents

| | |
|---|----|
| 1. INTRODUCTION | 3 |
| 1.1. BACKGROUND TO THE DOCUMENT | 3 |
| 1.2. THE UPDATED 2019 STAKEHOLDER ENGAGEMENT PLAN..... | 3 |
| 1.3. OVERVIEW OF THE PROJECT | 3 |
| 2. STAKEHOLDER IDENTIFICATION | 4 |
| 3. PREVIOUS STAKEHOLDER ENGAGEMENT..... | 5 |
| 4. STAKEHOLDER ENGAGEMENT DURING OPERATION..... | 6 |
| 4.1. ENGAGEMENT WITH STAKEHOLDERS | 6 |
| 4.2. INFORMATION DISCLOSURE ACTIVITIES | 7 |
| 5. GRIEVANCE PROCEDURE | 7 |
| 5.1. OVERVIEW | 7 |
| 5.2. EURASIA TUNNEL PROJECT GRIEVANCE PROCEDURE..... | 7 |
| 6. RECORDING AND MONITORING STAKEHOLDER ENGAGEMENT..... | 9 |
| 6.1. STAKEHOLDER REGISTER..... | 9 |
| 7. EVALUATION OF EFFECTIVENESS..... | 9 |
| 7. ATAŞ CONTACT INFORMATION | 10 |

1. INTRODUCTION

1.1. BACKGROUND TO THE DOCUMENT

The Eurasia Tunnel Project is developed by ATAŞ (Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.), which has been selected by the Turkish Ministry of Transportation and Infrastructure General Directorate of Infrastructure Investments (AYGM) - Turkish Ministry of Transport, Maritime Affairs and Communications General Directorate of Infrastructure Investments -. The company designed, built and operates a new tunnel for the tunnel beneath the Bosphorus that links the European and Asian sides of Istanbul.

The Project's development is occurring under a Build-Operate-Transfer (BOT) contract between ATAŞ and AYGM, which was formally signed in February 2011. Following the finalizing of the contract, on March 7, 2011, an effort to inform and consult with the public (including local residents, businesses and other interested parties, together referred to as the "Stakeholders") about the Project commenced. This effort has been carried out in accordance with stringent international standards for stakeholder engagement established by the international financial institutions that provided funds for the Project.

An Environmental and Social Impact Assessment (ESIA) has also been prepared for this Project according to standard international practices (see Project website: <https://www.avrasyatuneli.com/>). The initial Stakeholder Engagement Plan (2012) was prepared in conjunction with general ESIA process requirements for the Project and further updated in March 2017 and December 2019.

The Stakeholder Engagement Plan (SEP) aims to ensure that adequate and timely information is provided to people directly affected by the Project, as well as other stakeholders, so that they have an opportunity to voice their opinions and concerns. These concerns may influence Project decisions. The SEP aims to define a consistent, comprehensive, coordinated and culturally appropriate approach to stakeholder engagement that continues throughout operation stage. ATAŞ is committed to pursuing this engagement in a manner consistent with internationally established good practice.

1.2. THE UPDATED 2019 STAKEHOLDER ENGAGEMENT PLAN

This document is the Stakeholder Engagement Plan (SEP) for the operation stage of the Eurasia Tunnel Project. This current version of SEP, finalised in March 2017 and updated in December 2019, concentrates on the engagement mechanisms that ATAŞ undertakes during the operation stage.

The SEP is the responsibility of ATAŞ, and ATAŞ is fully committed to implementing it with complete transparency and accountability. Some information will remain confidential (e.g., market-sensitive information and personal data pertaining to individuals), but the overall objective is to maintain a transparent, fair engagement strategy throughout the Project.

1.3. OVERVIEW OF THE PROJECT

The Eurasia Tunnel Project involves the design, construction and operation of a 5.4 km twin-deck automobile tunnel beneath the Bosphorus Strait. The tunnel runs from the Kumkapı Coast on the European side of Istanbul to the Koşuyolu District on the D100 State Highway on the Asian side.

The Project also widened 9.2 km of approach roads to the tunnel along Kennedy Caddesi on the European side and the D100 Istanbul-Ankara State Highway on the Asian side. These sections are transferred to Istanbul Metropolitan Municipality after completion of construction.

Figure 1.1 (below) illustrates the location of the Project in Istanbul. Including the roadways and the tunnel, the route covers a total distance of 14.6 km.

Figure 1.1 Location of the Eurasia Tunnel Project



2. STAKEHOLDER IDENTIFICATION

For the purposes of this SEP, a stakeholder is defined as any individual, organization or group potentially affected by the Project or who has an interest in the Project and its impacts. The objective of stakeholder identification was and is to determine which stakeholders may be directly or indirectly affected (“affected parties”), either positively or negatively, or have an interest in the Project (“interested parties”).

To this end, concerted effort must be made to identify any disadvantaged or vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the process.

Stakeholder identification also remains an ongoing process and undergoes regular review and revision as the SEP proceeds.

The following groups of stakeholders are considered affected by or interested in the operation period of Eurasia Tunnel Project.

Stakeholders List

- Owners, occupiers, tenants and other user of real estate (land and building within the tunnel footprint)
- Business owners and employees of businesses operating within the tunnel footprint
- Users of roads and Eurasia Tunnel (customers)
- Providers of transport
- The general public and local business community
- Local community leaders
- National Government Organizations
- Provincial Government Organizations
- Municipal and District Government
- Local, national and international environmental and sustainability NGOs
- Local, national and international social NGOs
- Business and professional associations
- International financial institutions

- National and local press, TV stations and radio stations
- International organisations (e.g., UNESCO, ICOMOS)
- Regulatory authorities

Communication with local neighborhoods has primarily occurred through Muhtars (neighborhood leaders), who represent 25 neighborhoods within four districts along the route (Zeytinburnu and Fatih on the European side and Üsküdar and Kadıköy on Asian side). This is shown below in *Figure 2.1*.

Figure 2.1 Four Istanbul districts containing the Project



- **Üsküdar District:** Selimiye, Acıbadem, Barbaros and Ünalın
- **Fatih District:** Cankurtaran, Küçük Ayasofya, Sultanahmet, Nişanca, Şehsuvar Bey, Katip Kasım, Muhsine Hatun, Cerrahpaşa, Aksaray, Kocamustafa Paşa and Yedikule
- **Zeytinburnu District:** Kazlıçeşme
- **Kadıköy District:** Koşuyolu, Acıbadem, Hasanpaşa, Merdivenköy, Dumlupınar, Sahrayıcedid, 19 Mayıs, Kozyatağı and Bostancı

During the operation period, user of Eurasia Tunnel (ET) is one of the key stakeholders and engagement with ET users is outlined under section.

3. PREVIOUS STAKEHOLDER ENGAGEMENT

There has been on-going engagement with all stakeholders since pre-construction and during construction phases. For example, significant changes and updates to the Project plans are shared with the local community, as are information regarding key progress milestones (e.g., start of overall construction, start and finalization of tunnel works, completion of major road sections widening) and the Project's work program and construction methods were managed in accordance with comments and complaints from the public. For more information please check Eurasia Tunnel Stakeholder Engagement Plan for Construction (<https://www.avrasyatuneli.com/en/corporate/social-responsibility-and-environment/communication-with-stakeholders>) and Stakeholder Engagement Plan Close-out Report (https://www.avrasyatuneli.com/assets/pdf/sepcloseout_final_clean_clean.pdf).

4. STAKEHOLDER ENGAGEMENT DURING OPERATION

4.1. ENGAGEMENT WITH STAKEHOLDERS

- A project hotline has been established (0850 222 8020) and is in operation. Information on tolling, route information, tunnel rules, violation payments and other queries or grievances. The Hotline is open every day between 08.30-19.30. Operators call back the people who called hotline out of working hours.
- There is a form on Project website to contact ATAŞ (<https://www.avrasyatuneli.com/en/contact-us>).
- An e-mail address has been opened and is in operation (bilgi@avrasyatuneli.com).
- Local complaint board on web has been opened and is in operation (www.sikayetvar.com).
- Grievance form is provided to stakeholders who visits Operation&Maintenance Building. Two employees from call center are also designated to support mentioned stakeholders to fill the form.
- Stakeholders can sign up to e-newsletter to receive news about the Eurasia Tunnel (<https://www.avrasyatuneli.com/en/>).
- Tunnel users are able to check their pass status and also pay toll free and/or violation if any, via Project website without any services fees (<https://www.avrasyatuneli.com/en/toll-violation-payment/>). Payments might also be done via Garanti Bank, Türkiye İş Bankası and Yapı Kredi Bank branches and applications.
- Air quality monitoring is ongoing with two stations established in the vicinity of the ventilation stacks on both sides of the tunnel. Data are disclosed to public via National Air Quality Monitoring System (<https://havakalitesi.ibb.gov.tr/>).
- Regarding the archaeological excavations, a popular report for public which is presenting the archaeological works and findings during the construction of the Project is prepared in November 2017 and disclosed in February, 2018 (https://www.avrasyatuneli.com/assets/pdf/avrasya_renglishbask.pdf). Please contact Turkish Republic Ministry of Culture and Tourism General Directorate of Cultural Heritage and Museums, Directorate of Istanbul Archaeological Museums (<https://kvmgm.ktb.gov.tr/TR-44095/istanbul-arkeoloji-muzeleri-mudurlugu.html>) for further information.
- Information boards regarding the historical significance of Historic Peninsula are constructed in Coastal Park in consultation with the Istanbul Metropolitan Municipality in September, 2017.
- Relevant project updates are reachable via Project website (<https://www.avrasyatuneli.com/en/>), and further information is reachable via call center (0850 222 8020), e-mail (bilgi@avrasyatuneli.com), grievance form on Project website (<https://www.avrasyatuneli.com/en/contact-us>) and at the Operation&Maintenance Building (Dr. Eyüp Aksoy Cad. No: 9 Üsküdar, İSTANBUL). If you would like to receive hard copy of the document/s, please submit your request with your full address details to bilgi@avrasyatuneli.com and/or call center via 0850 222 80 20, the printed document/s will be delivered to the address stated by you within 7 working days at the latest.
- Stakeholders also can have an opportunity to person-to-person meeting with Project E&S Specialist.
- Compensation to all PAP's from construction period is completed. Thus, consultation, monitoring and support to sensitive PAP's is still on-going. Construction of new Kumkapı Fish Market is completed and moved to their new permanent place in May, 2018. During the

transition period, consultation, monitoring and support to the fish stalls/restaurants owners are on-going in accordance with Land Acquisition&Compensation Resettlement Plan (LACRP). Monitoring livelihood is still on-going.

- Regular meetings and monitoring of Petrol Stations (3) on the Asian side entrance and exit are on-going in accordance with Land Acquisition&Compensation Resettlement Plan (LACRP).

4.2. INFORMATION DISCLOSURE ACTIVITIES

- Information about the tunnel traffic status, road closures etc. is provided through project information channels (Variable Message Signs, radio broadcast system, Project website etc.) and Istanbul Metropolitan Municipality communication channels (Traffic App, FM Radio, social network etc.).
- Significant changes and updates on the Project will continue to be shared with the local community and the public.

5. GRIEVANCE PROCEDURE

5.1. OVERVIEW

A Grievance Management Procedure has been established for the Eurasia Tunnel Project in line with international best practices; this procedure provides a formal and ongoing avenue of engagement for stakeholders who consider the Project to have an adverse effect on their rights or interests. A grievance is defined as any complaint about the way the Project is being operated. It may take the form of a specific complaint about impacts or harm caused by the Project; concerns about access to the Project's stakeholder engagement process; or concerns about how comments have been addressed; concerns about Project activities during operation or perceived incidents or impacts.

5.2. EURASIA TUNNEL PROJECT GRIEVANCE PROCEDURE

ATAŞ's implementation of the Grievance Procedure for this Project is fall under the day-to-day jurisdiction of a formally designated Environmental and Social (E&S) Specialist, who reports to the Environmental and Social (E&S) Manager at ATAŞ.

The grievance process for this Project follows these key steps:

- 1. Identification of grievance** through personal communication with the customer representatives and/or Project E&S Specialist via phone, letter, Grievance Form, person-to-person meeting, or any other route.
- 2. The Grievance is formally acknowledged** within five working days of submission through a personal meeting, phone call or letter, depending on the circumstances. If the grievance is not well understood or if additional information is required, clarification will be solicited from the complainant during this step in the process.
- 3. The E&S Specialist informs Senior Management of the Grievance, as appropriate and when required.** The E&S Specialist provides support to the Senior Management in deciding who should address the grievance and determine whether additional support is necessary.

4. **The E&S Specialist formally delegates the further handling of the grievance** in writing, communicating with the relevant department(s)/personnel/contractors in order to generate an appropriate response.
5. **The delegated team and E&S Specialist generates a response**, with input from the Senior Management and others as necessary. Should the need arise, especially in cases of complex grievance issues, ATAŞ considers establishment of a conflict resolution "committee".
6. **Required actions are taken** to address the grievance, and the completion of these actions are recorded in the grievance log.
7. **The appropriate manager signs off on the response.** This sign-off may take the form of a signature on the grievance log or correspondence, which should be filed with the grievance to indicate agreement, and referenced in the grievance log.
8. **The response is conveyed to the affected party.** The E&S Specialist ensures that a suitable communication approach has been taken, so that the affected party agrees on the response and implementation approach.
9. **The response of the complainant is recorded** to help assess whether the grievance is resolved or whether further action is needed. The E&S Specialist employees appropriate communication channels, most likely a telephone call or face-to-face meeting, to confirm that the complainant has understood and is satisfied with the response taken. The complainant's response to relevant actions are recorded in the grievance log.
10. **The grievance is closed**, following a sign-off from the E&S Specialist, who determines whether the grievance has been resolved or whether further attention or action is required. If further attention is required, the E&S Specialist returns to Step 3 to re-assess the grievance and then take appropriate action. **ATAŞ endeavors to resolve grievances within one month.** If this is not possible, the complainant will be kept advised of progress on a regular basis.

At all times, the complainant is able to seek other legal avenues available to him or her in accordance with the laws and regulations of the Republic of Turkey.

The Grievance Procedure is free, open and accessible to all, and carried out in a fair and transparent manner. Information about the Procedure, whom to contact and how, is made available on the Project website and in other relevant materials.

Overall, the E&S Specialist holds responsibility for the Grievance Procedure throughout the life of the Project, ensuring that external stakeholders remain aware of the relevant procedures and that all communication is handled promptly and in an appropriate manner.

Operator and its sub-contractors are integrated into the same system and addresses their grievances in the same manner, according to the same standards.

The ETP Grievance Form appears in Annex B. *(Please note that the Form in this Annex is for informational purposes only; separate hard-copy hand-outs of the Grievance Forms are available for use by complainants at designated location.)*

6. RECORDING AND MONITORING STAKEHOLDER ENGAGEMENT

This section presents an overview of the current monitoring and reporting of SEP activities.

6.1. STAKEHOLDER REGISTER

Issues that arise during the Operation Phase are recorded so that they can be tracked until appropriate resolution and closure is achieved. Stakeholder records currently on file include:

- A reference number for the stakeholder
- Name and contact details (unless requesting anonymity)
- Date of contact(s)
- Details regarding contact(s)
- Issue(s) raised (comments, suggestions, questions, complaints, etc.)
- Proposed response and actions to be taken
- Status (recorded, active, closed)

To date, a list of relevant organizations and individuals and their contact details have been compiled to enable ATAŞ to readily communicate with each stakeholder. This list is being actively maintained.

These informations are on record in accordance with Law on the Protection of Personal Data, and has not been shared with any third parties.

7. EVALUATION OF EFFECTIVENESS

The E&S Specialist evaluates the effectiveness of engagement activities during project operation, measuring this against the goals and objectives set out in the SEP. The E&S Specialist evaluates the extent to which activities were implemented in accordance with the Plan and the extent to which they achieved the designated aims.

A set of Key Performance Indicators (KPIs) for the Stakeholder Engagement and the Grievance Procedures are used to formalize the SEP evaluation. The KPIs include the following:

1. SEP is in place, up to date and available to the public for comment on the ATAŞ Project website and in location specified in the SEP.
2. All planned actions are implemented as scheduled.
3. Local residents and other stakeholders are aware activities of Operation has possibility to affect them (e.g. noise pollution). If local residents and other stakeholders would like to raise a grievance related to these activities, they can use the Grievance Procedure.
4. Information on Comment and Grievance Procedures has been disseminated and is operating as planned.
5. Operator and sub-contractors have adopted the same systems for airing concerns or making queries.
6. All queries/complaints received are acknowledged within five working days, and all grievances are either resolved within one month or the complainant is directed to the appropriate programme for addressing their complaint.

8. ATAŞ CONTACT INFORMATION

In case of any questions regarding this SEP document or the Project, please contact ATAŞ at the address below, or via the below telephone number, email address or website.

Eurasia Tunnel Project Public Information

0850 222 80 20 (Turkish Hotline)

bilgi@avrsyatuneli.com

www.avrsyatuneli.com

Eurasia Tunnel Operation&Maintenance Building

Dr. Eyüp Aksoy Cad. No:9 Üsküdar/İSTANBUL

ANNEXES

A: Project Communication Channel and Details

B: Grievance Form

Annex-A: Project Communication Channels and Details

| Communication Channel | Via |
|-----------------------|---|
| Call center | 0850 222 80 20 |
| E-mail | bilgi@avrsyatuneli.com |
| Web form | https://www.avrsyatuneli.com/en/contact-us |
| Local complaint board | şikayetvar.com |
| Grievance form | Operation&Maintenance Building Dr. Eyüp Aksoy Cad. No:9 Üsküdar/İSTANBUL |

Annex-B: Grievance Form

| Eurasia Tunnel Project: RECORD OF GRIEVANCE | |
|---|---|
| INFORMATION REGARDING INDIVIDUAL SUBMITTING THE GRIEVANCE | |
| Name: | <i>Internal use only: how was the grievance lodged:</i> <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> At reading room <input type="checkbox"/> By mail <input type="checkbox"/> By email <input type="checkbox"/> Other (please specify) |
| Date lodged: | |
| Recorded by: <input type="checkbox"/> Person submitting grievance <input type="checkbox"/> Other (please specify who) _____ | |
| Address: | |
| Email address: | |
| District/Community: | <i>Internal use only: Confirm that the Grievance has been acknowledged and that the complainant has been provided with a copy of this form?</i> <input type="checkbox"/> Yes. Date: |
| What is the best way to contact you? <input type="checkbox"/> Telephone (specify number) _____ <input type="checkbox"/> E-mail (specify address) _____ <input type="checkbox"/> via Muhtar (specify name and address) _____ <input type="checkbox"/> Other (please specify) _____ | |
| Signature of Complainant confirming receipt of completed Grievance Form copy: | |
| Do you wish to be kept informed of Project developments? <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| INFORMATION REGARDING GRIEVANCE | |
| Describe the Grievance: | |
| EXPECTED ACTIONS IN RESPONSE TO THE GRIEVANCE | |
| What outcome would you like to see? | |