



**DEVELOPMENT
INVESTMENT**
BANK OF TÜRKİYE



THE WORLD BANK

STAKEHOLDER ENGAGEMENT PLAN

FOR

FORMAL EMPLOYMENT CREATION PROJECT-2

DEVELOPMENT AND INVESTMENT BANK OF TÜRKİYE (TKYB)

JANUARY 2025

REVISION HISTORY

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ABBREVIATIONS & ACRONYMS

EIS	Entrepreneur Information System
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GDP	Gross Domestic Product
GRM	Grievance Redress
GRS	Grievance Redress Service
IFI	International Finance institution
IMF	International Monetary Fund
LE	Large Enterprise
MoLSS	Ministry of Labor and Social Services
MoFT	Ministry of Finance and Treasury
MoIT	Ministry of Industry and Technology
OECD	Organisation for Economic Co-operation and Development
OIP	Other Interested Parties
PAP	Project Affected People
POM	Project Operational Manual
PIU	Project Implementation Unit
PPM	Public Participatory Meeting
SEP	Stakeholder Engagement Plan
SGK	Social Security Institution
SME	Small and Medium Enterprises
SMEDO	Small and Medium Enterprise Development Organization
TKYB	Turkish Development and Investment Bank
WB	World Bank

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1. INTRODUCTION

PROJECT DESCRIPTION

Improving employability is significant for well-being, economic growth and social cohesion. Türkiye has one of the strong growing economic in the OECD countries over the past decades. Türkiye is a service-based, upper-middle-income economy with a population of 85.3 million as of 2023, making it the largest in the Western Balkans region (TURKSTAT, 2023). The economy's nominal gross domestic product (GDP) since the last assessment, it is 17th largest economy in the world, according to the IMF, with a GDP of \$1.024 trillion as of 2023. Real GDP growth averaged 5.4% between 2002 and 2022, resulting in income per capita (in real terms) that was more than doubled over the same period. Growth was accompanied by rapid poverty reduction: the poverty rate decreased from above 20% in 2007 to 7.6% in 2021.

While the COVID-19 pandemic had a negative impact on growth, Türkiye still managed to have positive growth in 2020 (1.9 percent). Türkiye achieved double-digit GDP growth in 2021 (11.4 percent) and maintained significant momentum in 2022 (5.5 percent) and 2023 (4.5 percent). The country experienced a robust economic expansion of 4.5% in 2023 with its macroeconomic strategies. Türkiye is dealing with the aftermath of the devastating earthquake which hit the Türkiye. This devastating earthquake caused more than 50,000 casualties, injured 107,000 people, damaged or destroyed 1.9 million housing units, and displaced 3.3 million people, of whom two million needed shelters. According to World Bank country assessments estimated the recovery and reconstruction needs at around \$81.5 billion. However, the growth rate is expected to moderate to slightly above 3% in 2024. Longstanding macro and structural challenges that constrain potential growth such as high inflation, low productivity growth, and declining foreign direct investment would require strong fiscal policies and ambitious structural changes to assist accelerate sustainable economic growth.

The strengthening of the private sector is critical for Türkiye's transition to high-income economy. The private sector represents 98 % of the country's top 500 enterprises in terms of turnover of 78 % investment (World Bank, 2024). Türkiye is also the largest employer in the country, as about 85 % of employees work in private companies, with Small and Medium Enterprises (SMEs) employing 72 % of the overall workforce. SMEs also generate more than 50 % of gross value added (SME Policy Index, OECD, 2022). The driving force behind economic growth has been the highly dynamic private sector which has sizeable Small-Medium Enterprises and Largescale Companies. There were estimated to be approximately 358 million small and medium-sized enterprises (SMEs) worldwide in 2023. The number of SMEs dropped slightly in 2020 during the COVID Pandemic, but has increased since. Across the globe, there are about 10 million women-owned small and medium enterprises (SMEs) in the formal business sector, which represent approximately 30 % of all SMEs in emerging markets.

SMEs constitute the backbone of the Turkish economy, 99.8 % of Turkish enterprises are SMEs. They generate around ¾ of the total employment and account for more than half of turnover. 13.1 % of all SMEs in Türkiye are owned by women. Due to the widespread use of incentives program of our bank and other public banks the number of women-owned SMEs have been increased to 17.4%. Almost 4 million SMEs are contributing to the manufacturing and service sector in Türkiye. (Türkiye Odalar ve Borsalar Birliği,2022)

At the same time, the manufacturing sector has been integrated into global value chains. Türkiye's exports now account for almost 1% of the world demand for goods and services (World Integrated Trade Solution,2022).

In 2024, renewable energy adoption among small and medium-sized enterprises (SMEs) in Turkey remains limited. Only 8% of SMEs have integrated renewable energy into their operations and 3% of those generating it on-site.

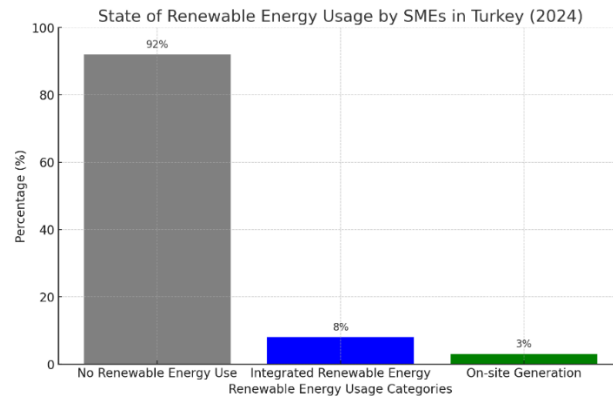


Figure 1: Renewable energy usage by SMEs in Turkey 2024

*statista / Published by Zeynep Dierks, Oct 28, 2024.

Türkiye's ability to build a productive, sustainably growing economy depends on the capacity of SMEs to expand, adopt the latest technologies, innovate, and participate in global value chains. Within the project activities which are to be held in 17 provinces that indicated in the map, below will facilitate the adaptation of latest technology, renewable energy and recovery of earthquake effects.

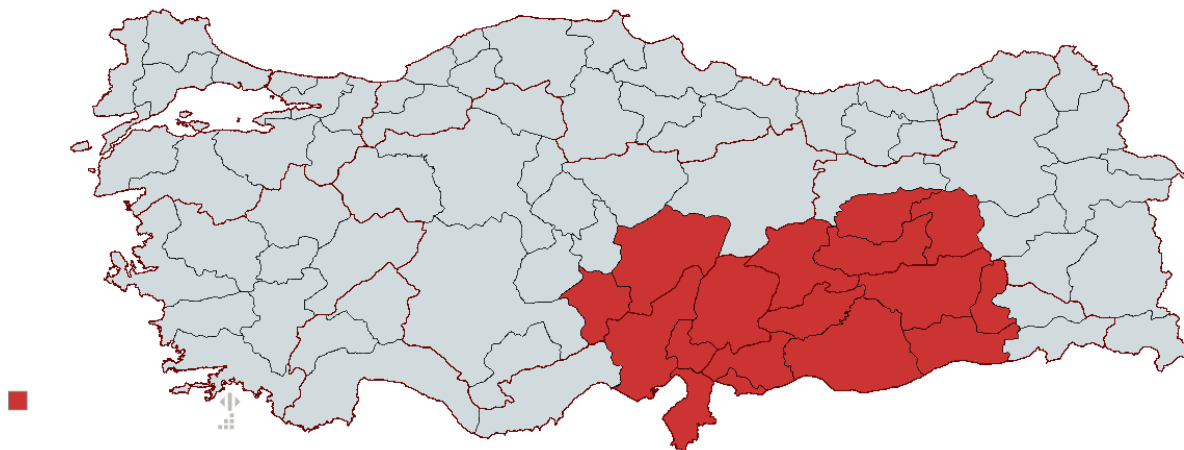


Figure 2: Project Provinces in the Türkiye's map

The project constitutes of loans targeting established firms (LE) and SMEs having high potential for employment creation. General activities of this project will include the generation of new employment and strengthening SMEs and LEs in the earthquake affected region. The project components: 1.1. Lending to private sector firms; 1.2. Demand-driven support for firm capacity building and training; 1.2. Demand-driven support for firm capacity building and training; and 2. Technical, institutional and implementation support. The General activities of this project will include the generation of new employment and strengthening SMEs and LEs in the earthquake affected region. According to The Ministry of Industry and Technology, the Entrepreneur Information System (EIS) data set, there were 25.000 SMEs in the project area in 2023 and 3,270 exporting SME's. The SMEs share in all firms (Large, micro scale) was 6% in 2023, when exempt the micro firms, SMEs accounted for 97% of firms in the region. The export of these SMEs exports accounted for 54.6 % while the large-scale firms were 45.4

%. The number of LEs was relatively small, 251 in the region. These SMEs which are the main economical actors in the region and LEs will be benefit from the project.

This plan adjust that the stakeholder management is a comprehensive process conducted throughout the project life cycle, in 17 provinces. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. This SEP describes the timing and methods of engagement with stakeholders throughout the life cycle of the project. The SEP is designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders. It also describes the range and timing of information to be communicated to different stakeholders, as well as the type of information to be sought from them. The SEP document will be continuously updated for the entire period of project implementation.

2. OBJECTIVE OF THE STAKEHOLDER ENGAGEMENT PLAN

The objectives of the Stakeholder Engagement Plan (SEP) are as follows:

- To establish a systematic approach to stakeholder engagement that will help TKYB to identify all stakeholders and build and maintain a constructive relationship with them.
- Outline modalities for information dissemination, stakeholder engagement activities, including stakeholder's views, interest to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with direct stakeholders throughout the project lifecycle on issues that could potentially create an impact.
- Define the roles and responsibilities of different actors to implement and monitor these activities.
- To ensure that relevant project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, technically and culturally appropriate and understandable, accessible and appropriate manner and format.
- To provide stakeholders with accessible and inclusive means to raise issues and grievances and allow TKYB to respond to and manage such grievances.

3. APPLICABLE GUIDELINES AND STANDARDS (REGULATORY CONTEXT)

3.1. National Legislation

The national legislation and regulatory requirements that are guidelines of implementation of the SEP summarize in the Table 1.

Table 1. National Legislation & Regulatory Requirements

Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)

"Citizens of the Republic of the Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Turkey examines complaints on the functioning of the administration."

Right to Constitutional Complaint (Constitution, Article 148)

"Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities. In order to make an application, ordinary legal remedies must be exhausted."

"Article 24, Appeal process - The applicant whose request for information was rejected may appeal to the Board within fifteen days starting from the official notification before appealing for judicial review. Appeals should be written. The Board shall render a decision within 30 days."

Law on the Right to Information (Articles 11 and 24)

"Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days."

The Environmental Impact Assessment Regulation No. 29186 (Article 1)

"1) In order to inform the public, to get their opinions and suggestions regarding the public disclosure; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor."

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM."

b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records."

2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule."

3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced."

4) The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting. "

3.2. World Bank Requirements

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element

of good international practice” (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- “Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

A Stakeholder Engagement Plan proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. An updated SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100).

4. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1. Key Stakeholder Meetings and Consultations

The key stakeholders will be Small and Medium Enterprises, Large Enterprises, their employees, government agencies, development agencies, development partners, and NGOs. The key aspects and inputs from these stakeholder engagement efforts have included meetings, summarized in a table below.

Table 1: Summary of FEC-2 Stakeholder Engagement Disclosure Meeting

Location	Date	Participants	Key Points of Meeting	Feedbacks
Online	04.02.2025	Özlem Cinemre (TKYB – Executive Vice President) Gülbin Çalışkantürk (Gaziantep Chamber Office – Deputy Secretary General) Yurdem Demir (TKYB- Corporate Marketing Department Head) Mehtap Altuğ (TKYB – Sustainability and Environmental Social Impact Department Head) Baran Uçaner (Gaziantep Chamber of Commerce - General Secretary) Ali Tatlı Dr. Faruk Kahvecioğlu (KOSGEB – Head of Project Management Department) M.Sermest Çapan (Gaziantep Chamber of Industry – Deputy Secretary General) Selin Mermer (Gaziantep Chamber of Industry – International Relations and Market Development Department – Expert) Merve Şerifoğlu (TKYB- Development Finance and Financial Institutions Vice President) Erkan Yılmaz (TKYB – Environmental Engineer) Sinem Sudan (TKYB – Environmental Engineer) Dila Aydın Aytekin (TKYB – Environmental Engineer) Erkan Yılmaz (TKYB – Environmental Engineer) Cihan Altınbaş (TKYB – Social Expert) Furkan Aksu (TKYB – Social Expert) Rumeysa Terzioğlu (TKYB – Social Expert) Tuğçem Yılmaz (TKYB Corporate Marketing Department Analyst) Yağmur Yavuz (TKYB – Corporate Marketing Department Senior Associate) KOSGEB – Department of Project Management Şevval Durmuş (TKYB – Intern) Ahmed Çağdaş (TKYB - Development Finance and Financial Institutions Senior Associate)	Detailed information was provided about TKYB at a glance and TKYB’s all funding sources and their requirements in sum. Besides, the current eligibility criteria and scope of WB-FEC-2 funding including the currency, maturity, terms, durations and targets shared. It was mentioned that the project is a continuation of FEC 1 for the World Bank, and specifics about FEC 2 were discussed, such as the regional coverage of the project which is earthquake region and especially the main end-user target of the project which is especially SMEs. Additionally, the purpose of the meeting and whether the stakeholders had any opinions or feedback on the project were shared. On the other hand, participants have been informed about available loan types of the project which are investment and working capital loans. Regarding the dynamics of region and SME segment clients, feedbacks of participants were obtained. Additionally; during the meeting expectations regarding loan amounts, the possibility of additional support, the suitability of SEP stakeholders, the applicability of E&S processes for SMEs, SMEs’ willingness to engage with E&S issues, and the implementation of gender inclusivity for SMEs were discussed.	The meeting was very fruitful, and the information for the project was well received. It was stated that there should not be any restriction about the types of loans, sectors, client segment etc in order to embrace as much as potential companies. The two most important needs of the region, finance and employment, were emphasized, and it was mentioned that the project would address these needs. It was stated that according to preference of the region and SME segment, the demand is concentrated for loans in TL currency. If some exporters prefer to borrowed in foreign currency, then it will be EUR mostly. The importance of having a grace period for repayments was mentioned. There were discussions suggesting that the SME definition, based on 50 employees, may be reconsidered to include smaller businesses. There were suggestions that, alongside loans, additional support should be provided within the project. Most of the companies within the region are knowledgeable about sustainability and E&S at the required level. It was also noted that SEP stakeholders are suitable, and there was a suggestion to add the Institution Gaziantep Commodity Exchange to the SEP as a key stakeholder. It was stated that SMEs want to improve themselves in environmental and social matters and need support in this area. The absence of specific employment targets for individual companies and the lack of sector differentiation were considered positive developments.

*The photo which was taken on the meeting was added at the end of SEP (Annex 1)

The SEP disclosure meeting held on February 4, 2025. Other stakeholder engagement activities are planned to be held with Chamber of Commerce and Chamber of Industries of 17 provinces. Additionally, the Small and Medium Enterprises Development Organization (SMEDO/ KOSGEB), Gaziantep Commodity Exchange, Association of the Small and Medium Enterprises (KOBİDER), Association of Kahramanmaraş Businessmen in Industry (KASİAD), Adana Genç İş İnsanları Derneği (Adanagiad), Association of Middle Eastern Industry and Enterprise (DASİFED) (Hatay, Kahramanmaraş,Osmaniye), Association of South Eastern Industry and Enterprise (GÜNSİFED) (Adıyaman, Antep, Kilis), Association of Fırat Industry and Enterprise (FİRATSİFED) (Malatya, Bingöl, Elazığ, Tunceli) and other relevant institutions will be also consulted.

Further incorporation with these mainstream actors will be made within the project design and implementation processes. The implementation support strategy is developed considering the risks

and mitigation measures related to the operation and targets the provision of flexible and efficient implementation. The findings of the beneficiary dialogues covering recommendations for the FEC II guidelines will be included in the Project Operations Manual.

TKYB will also engage with several private enterprises (potential beneficiaries) as part of its regular marketing activities which are in different sizes and operating in various sectors in targeted provinces and inform them about the financing facility and will consider their interest level of the program.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

A key element of any SEP is effective identification of key stakeholders. Stakeholders are defined as workers, companies, small firms, local authorities or individuals who can affect, are affected by, or have a legitimate interest in the Project.

For the purpose of the SEP, the term **“Project-affected parties” (PAPs)** includes “those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities” (World Bank, 2018b).

The term **“Other interested parties” (OIPs)** refers to “individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups” (World Bank, 2018b).

Vulnerable groups, It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups to be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits.

5.1. Project- Affected Parties

There will be two main group of direct affected parties of the project:

- 1) Beneficiary private enterprises, LEs and SMEs , and those that are eligible for financing and willing to abide by the employment conditionality, operating in the 17 targeted provinces.**
- 2) Workers of LEs and SMEs who will participate in the trainings provided as part of the project.**

5.2. Other Interested Parties

The local authorities and actors may have influence on the local economy; hence they will be other parties of the project. In that sense, there will be many indirect stakeholders across the 17 targeted provinces:

1. National authorities involved with the program: The Ministry of Finance and Treasury (MoFT), The Ministry of Industry and Technology (MoIT), The Ministry of Labor, and Social Services (MoLSS), Social Security Institution (SGK), other training providers and government agencies and Presidency of Republic of Turkey.
2. Local authorities in the 17 selected provinces (Sanliurfa, Hatay, Gaziantep, Adana, Kilis, Mardin, Kahramanmaras, Kayseri, Osmaniye, Diyarbakir, Malatya, Adiyaman, Batman, Elazığ, Tunceli, Niğde, Bingöl).
3. NGOs (ILO, UN Agencies).

5.3. Vulnerable Individuals or Groups

Particular disadvantaged or vulnerable individuals and groups in the context of this project would be women, youth, and disabled, who experience a higher-than-average unemployment or are in informal employment characterized by less pay, and possibly under exploitative conditions and generally have less means and opportunity to express their concerns, or access information to understand their rights or the impact of the project.

The disadvantages experiences by these groups are frequently compounded by less awareness of their rights according to the Labor Law, less access to information due to language or reduced mobility, low skills and low relevant job experience, and prevailing social norms inhibit their gainful employment

The key stakeholders that identified within the scope of the project is indicated below in the Table 3.

Table 3: All Project Stakeholders and Their Influence

Stakeholders	Relevance/ Area of Influence	Significance
PROJECT AFFECTED PARTIES		
Women-inclusive enterprises,	Assessing LEs firms, SMEs having high potential who are women inclusive enterprises.	High
Large, Small and Medium Enterprises in relatively less developed sub-regions affected	Loans target LEs, SMEs which are located in earthquake area (in 17 provinces) having high potential for employment creation and large enterprises. Additionally, existing LEs and LEs who are innovative on job creation with project support.	High
Employees of LEs and SMEs beneficiary firms	Employees under SMEs and LEs will benefit from employment and trainings due to project support	High
Vulnerable groups	Vulnerable groups may include women, youth, and disabled, who experience a higher-than-average unemployment or are in informal employment characterized by less pay, and possibly under exploitative conditions. They may be illiterate or have different vulnerabilities (such as disabilities) which would require differentiated measures for meaningful engagement to project activities and information disclosure.	Medium
OTHER INTERESTED PARTIES		

Ministry of Treasury and Finance,	The Ministry can influence the policies and legislative framework of project loans	Medium
Ministry of Industry and Technology (MoIT)	The Ministry would collaborate on the sectoral analysis in the Earthquake region	Medium
Ministry of Trade	The Ministry would collaborate on the preparation of legislation on Trade Union	Medium
Ministry of Labor and Social Services	The Ministry can influence the policies and legislative framework on work and employment conditions	Medium
Ministry of Environment, Urbanization and Climate Change	The Ministry can influence the policies and legislative framework on environmental permits etc. of companies.	Medium
Private Sector organizations, Private Actors (Chamber of Commerce and Chamber of Industry, Commodity Exchange Institutions)	Private sectors and their actors will have an overall interest to integrate small and large businesses into the project components. Additionally, commodity exchange institutions will support the project activities.	Medium
Development Agencies	Development Agencies provides overall oversight of sectoral tendencies, strategies relating to the area	Medium
Provincial Directorates of Relevant Ministries	Local authorities will support the engagement of local sectoral needs and priorities for project-related facilities.	Medium
Small and Medium Enterprises Development Organization (SMEDO /KOSGEB)	SMEs Development Organization would collaborate engagement of SMEs to the project's activities.	Medium
Municipalities in 17 provinces	Municipalities will support the engagement of citizens in participatory decision-making processes over local sectoral needs and priorities for project-related facilities.	Medium
Confederation of Turkish Trade Unions [Türk-İş], Hak- İş and DISK	Labor representatives and trade unions will have interest to monitor employees' conditions and sectoral trade unions into the project components	Medium
National media (print and electronic) and Local media in the 17 targeted provinces	The media will have a key role in disseminating information on the efforts and results of the project	Medium
ILO	The ILO office in Turkey strives to guarantee the core elements of social justice, which are respect for human rights, decent living standards, human working conditions, employment opportunity and economic security for working people everywhere. In line with this objective, the ILO aims to combat child labor, to increase women and youth employment, to strengthen social dialogue and eliminate informal economy.	Low
UN Agencies	The project will seek to coordinate efforts with UN Agencies, where relevant, in project areas.	Low
General Public	The public will have a broad interest in the project's results and beneficiaries. Public perception is also important in influencing community perception of the project.	Medium

6. STAKEHOLDER ENGAGEMENT PROGRAM

6.1. Overview of Stakeholder Engagement Plan

The table below presents roles and responsibilities of key actors in stakeholder engagement to be conducted under the project. Detailed methods of consultations are provided in the table in below. However, due to earthquake and recovery effects may restrict operations require new methods, tools and techniques for stakeholder engagement. Only after easing of these restrictions, different engagement methods that cover different needs of the stakeholders will be implemented.

Table 6: Stakeholder Engagement Program

Target Stakeholders	Project Phase	Communication Channels/Materials	Engagement Mechanism(s)	Purpose	Frequency	Responsible Party
Women-inclusive enterprises,	Preparation	Non-technical summary of project and SEP	Beneficiary Dialogues	To apprise target beneficiaries and communities of project activities, potential environmental and social risks	Once during project preparation, and thereafter as necessary	TKYB PIU
Large, Small and Medium Enterprises						
Private Sector Organizations	Preparation	Non-technical project summary and SEP	Online Meetings	To communicate successful narratives of LEs, SMEs and formal employment; to highlight opportunities for private sector investment in creating new job opportunities	Once during project preparation, and thereafter as necessary	TKYB PIU
Private Sector Actors (Chamber of Commerce and Chamber of Industry)	Preparation, implementation	Non-technical project summary and SEP, project websites/project social media channels	• Presentations • Public meetings • Online meetings	To communicate the project requirements and reach out to beneficiaries	Once during preparation and first Quarter of the project	TKYB PIU
Media	Implementation	Project websites and project social media channels	Emails	To inform the public, private sector and LEs, SMEs about project's contribution to formal employment and new job creation	Throughout the project lifetime	TKYB PIU

Large, Small and Medium Enterprises and their Employees	Implementation/post completion	Non-technical summary of survey objectives, survey questionnaire, report and survey findings	Beneficiary satisfaction survey as part of mid- and end-line evaluations	Evaluate beneficiary perceptions of project outcomes and processes	Twice – baseline & completion surveys	TKYB PIU
Ministry of Treasury and Finance	Implementation	Emails; progress reports; regular briefings	Official meetings	Share information regarding progress and challenges of project implementation	Annual	TKYB PIU
Ministry of Industry and Technology (MoIT)	Preparation and implementation	Non-technical project summary and project progress reports	Official/online meetings, emails	To keep them informed about the project's activities	Throughout the project lifetime	
Ministry of Trade						
Ministry of Labor and Social Services						
Ministry of Environment, Urbanization and Climate Change						
Municipal Authorities	Preparation and implementation	Non-technical project summary and SEP, implementation/planning documents	Consultations, official/online meetings	Discuss, exchange ideas and inform about project's contribution to formal employment and new job creation	Once during project preparation, and thereafter as necessary	TKYB PIU
Development Agencies	Preparation, implementation	Non-technical project summary and SEP	Consultations; official/online meetings	Discuss, exchange ideas and inform about project's contribution to formal	Once during project preparation, and	TKYB PIU

				employment and new job creation	thereafter as necessary	
Provincial Directorates of Relevant Ministries	Preparation, implementation	Non-technical project summary and SEP	Consultations; official/online meetings	Discuss, exchange ideas and inform about project's contribution to formal employment and new job creation	Once during project preparation, and thereafter as necessary	TKYB PIU
Small and Medium Enterprises Development Organization (SMEDO /KOSGEB)	Preparation implementation	Non-technical project summary and SEP	Official/online meetings	Discuss, exchange ideas and inform about project's contribution to formal employment and new job creation	Once during project preparation, and thereafter quarterly during implementation	TKYB PIU
Confederation of Turkish Trade Unions [Türk-İş], Hak- İş and DISK	Preparation, implementation	Non-technical project summary and SEP	Official/online meetings	To communicate formal employment conditions; to highlight opportunities for private sector investment in creating new job opportunities	Once during project preparation, and thereafter as necessary	TKYB PIU
UN Agencies	Preparation, implementation	Non-technical project summary and SEP	Consultations; information meetings	Discuss, exchange ideas and inform about project's contribution to formal employment and new job creation	Once during project preparation, and thereafter as necessary	TKYB PIU
Component 1.1						
Women-inclusive enterprises,		- Emails - Online meetings	A participatory need surveys questions	To understand the training needs of firms and evaluate	Second Quarter of the Project Cycle	TKYB PIU

Large, Small and Medium Enterprises	Implementation		• Project summary • Grievance redress/beneficiary feedback mechanism	the training with post survey.		
Large, Small and Medium Enterprises and their Employees						
Vulnerable groups		Appropriate meetings/channels will be determined	• Grievance redress/beneficiary feedback mechanism	• For disabled persons who want to engage in the project, the project will include measures for their accessibility. • Depending on the disability circumstances For illiterate, verbal and non-technical communication will be utilized in public participation meeting		
Component 1.2						
Women-inclusive enterprises,	Implementation	• Online training platforms • Virtual trainings (TKYB’s own staff will provide virtual trainings on economy, sustainability and financial analysis and reporting to beneficiary firms virtually. 5 sessions of sustainability, 2 sessions of	• Trainings • Satisfaction surveys • Post-training assessments • Grievance redress/beneficiary feedback mechanism	Capacity building	3 times (probably with a 4-month duration each) throughout the project lifetime 5 sessions all sessions are one hour	TKYB PIU
Large, Small and Medium Enterprises						
Large, Small and Medium Enterprises and their Employees						

		economy and 2 sessions of financial analysis and reporting are planned)				
Vulnerable groups	Implementation	Appropriate meetings/channels will be determined				
Component 2						
Small and Medium Enterprises Development Organization (SMEDO /KOSGEB)	Implementation	• Project summary	• Consultations; information, discussion meetings	Discussions are carried out with KOSGEB to cooperate in the earthquake region to find out, analyze and support SMEs. Discussions with potential aggregators are carried out to find the right structures and instruments to access SMEs.	Throughout the project lifetime	TKYB PIU
TKYB Staff	Implementation	• Emails	• Participatory planning the training needs • Grievance redress/beneficiary feedback mechanism	To convene capacity building and facilitation activities reaching out, analyzing, risk evaluating and monitoring of SMEs with training	Throughout the project lifetime	TKYB PIU

*Abbreviations of target stakeholders are elaborated in the text (key stakeholder meetings and consultations) above

6.2. Overview of Stakeholder Engagement Methods

6.2.1. Disclosure Meetings

TKYB PIU will utilize their existing online communication channels and facilities for disclosure of written/print/visual materials. Project updates will be posted on TKYB's website. TKYB will share project information with both potential employees and employers. An easy-to-understand guide to the terminology used in reports, briefs and relevant documents will be provided on the website when relevant. Communication materials produced for project-related activities will be posted on the website.

Additionally, PIU will also communicate with applicable and preferred by the stakeholders, about project information and updates through other means such as social media, one to one interviews and consultation meetings when needed.

6.2.2. Consultation Meetings

Consultation meetings will be held with stakeholders including government authorities, municipal authorities, private sector businesses, chambers of commerce, civil society and existing SMEs etc.

6.2.3. Participatory Engagement Methods

Participatory engagement methods will utilize the engagement of particular disadvantaged or vulnerable individuals and groups in the context of this project. These would be women, youth and disabled, unemployment or are in informal employment characterized by less pay, and possibly under exploitative conditions and generally have less means and opportunity to express their concerns, or access information to understand their rights or the impact of the project.

In order to incorporate the view of vulnerable groups;

- Engagement with local organizations and NGOs representing the interests of persons with disabilities will be carried out.
- Separate consultations in places of easy access, will be conducted for women, youth and disabled persons and any other vulnerable groups in the targeted provinces.
- Consultations will be conducted at the locations which enable the access of vulnerable groups.

6.2.4. Grievance Mechanism

As a part of grievance mechanism, ongoing feedbacks and comments received from stakeholders throughout the implementation of the project will be reviewed and necessary restorative actions, if needed, will be undertaken by TKYB PIU with relevant stakeholders to ensure smooth implementation of the project.

Additionally, project GRM will be in place during the entire lifetime of the project to receive any concerns from both internal (project workers) and external stakeholders.

6.2.5. Communication Materials

Written information will be prepared by TKYB and disclosed to the public via a variety of communication channels, materials during implementation of the project. The materials will be reviewed quarterly and updated for dissemination as needed. In the project introduction brochures that will be presented to the stakeholders in the initial stage, general information about the project, as well as information about grievance mechanism and liaison/feedback channels will be provided.

The TKYB PIU will also update their website regularly (at least on a semi-annual basis) with key project updates and reports on the project's environmental and social performance.

Visual material will be used in consultation meetings. Presentations will be made for national authorities, local authorities, NGOs, beneficiary private enterprises during consultation meetings.

7. RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

The Project Implementation Unit will constitute staff from various departments of TKYB; Sustainability and Environmental and Social Impact Management Department, Engineering, Development Finance Institutions, Loan Allocation, Project Finance, Financial Analysis, and IT. Although PIU will be overall responsible for the implementation of SEP, the Sustainability and Environmental and Social Impact Management Department (Social Specialists) will specifically lead the implementation of SEP and GM.

Table 7: Implementation and Responsible Parties of the Engagement Plan

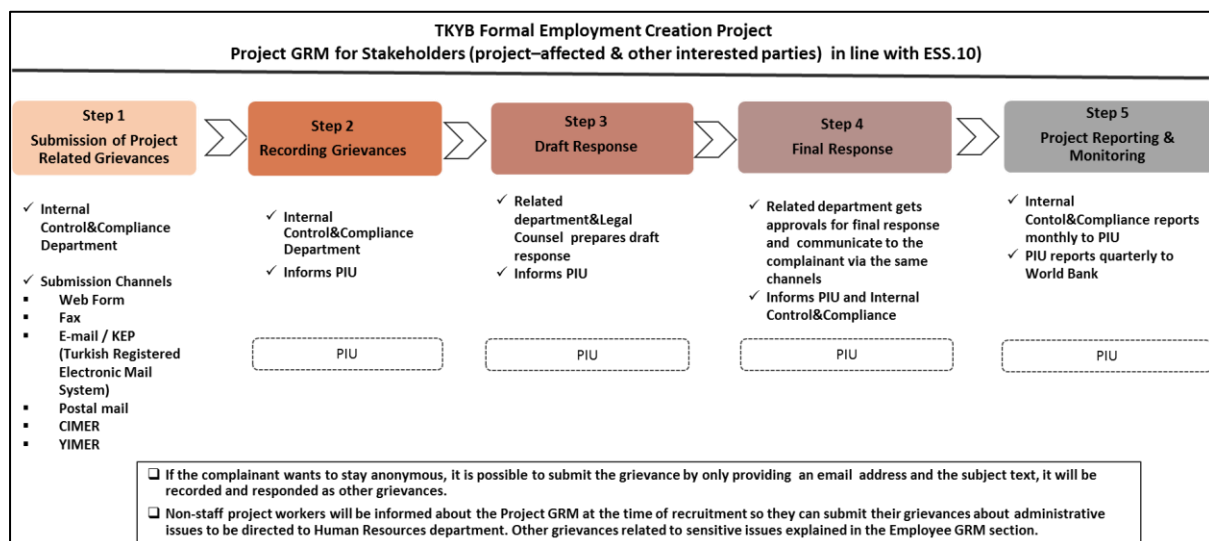
Actor/Stakeholder	Responsibilities
TKYB PIU / Sustainability and Environmental and Social Impact Management Department	• Planning and implementation of the SEP • Leading stakeholder engagement activities with development partners, the private sector • Management and coordination on resolution of grievances • Monitoring of and reporting on environmental and social performance to the World Bank • Consolidated reporting on SEP activities for the project overall • Make available the disclosed ESMS documents • Participation in stakeholder engagement activities arranged by PIUs

8. GRIVIANCE MECHANISM

The Grievance Mechanism (GM) is a process that allows any stakeholder to submit a complaint, raise a concern or provide feedback, such as suggestions, inquiries and compliments, regarding the planning, implementation or management of a project.

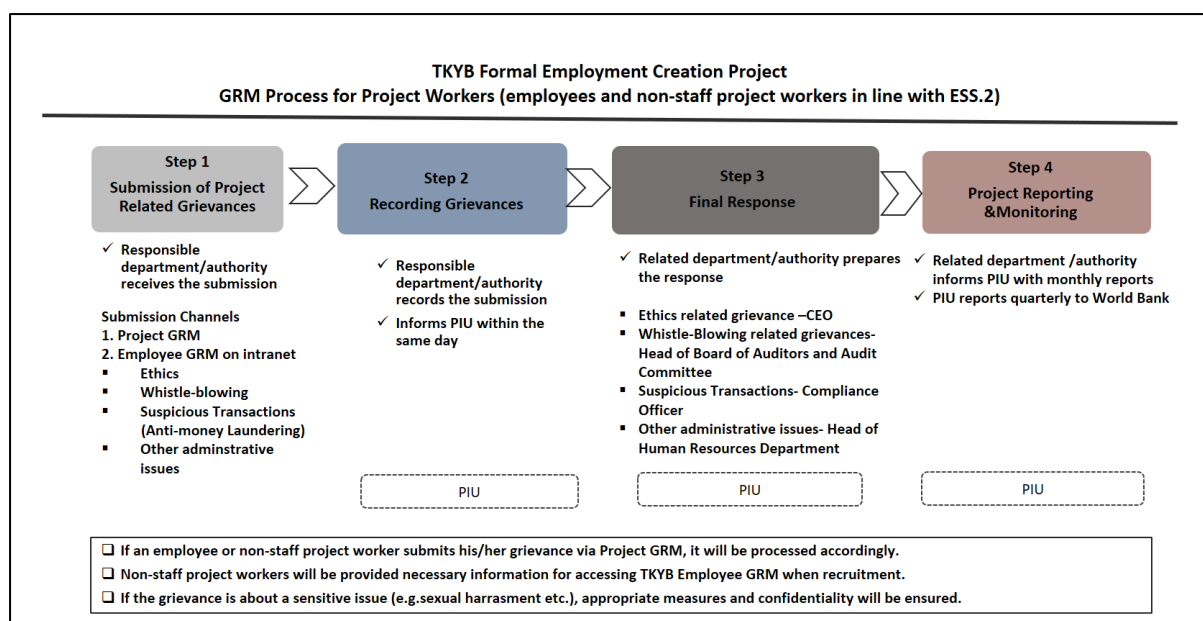
TKYB is conducting GRM externally and internally. TKYB has online and project based GRM. A new procedure called “Grievance Redress Mechanism for IFIs financed projects” has been introduced recently. In line with the requirements of ESS.10 (Stakeholder Engagement and Information Disclosure), the project specific grievance mechanisms will be open to the use of all stakeholders and it can be used to deliver any possible message, complaint and/or suggestion by any stakeholder via TKYB corporate website and other channels defined in the mechanism. In the context of the project we are expecting to receive any kind of feedbacks final beneficiary SMEs, LEs and also Project Affected Parties (PAPs) who may be impacted from the project; and other interested parties who may have an interest in the project (Figure 1).

Figure 1.



8.1. Internal Grievance Mechanism of the Bank:

TKYB has an internal employee grievance mechanism and procedure for its employees in line with the requirements of ESS.2 (Labor and Working Conditions). On the intranet page of the TKYB, employees are able to submit their grievances from the notification menu, which may be related to 1.Ethics, 2.Whistle-blowing, 3.Suspicious transactions, 4.Complaints and suggestions. Each grievance will be processed according to internal employee grievance procedure, which can be directed to the CEO in case of ethics related grievances; to the Board of Auditors in case of whistle-blowing related grievances; to the Compliance Officer (Head of Internal Control and Compliance department) in case of suspicious transactions related grievances and to human resources department in case of other complaints and suggestions (Figure 2).



If there are any non-staff project workers/consultants hired for specifically for this project, they will also be informed about the internal employee grievance mechanism at the time of recruitment and will be provided subject specific e-mail addresses for ethics and whistle-blowing related grievances. They will also be able to use the project GRM for their general complaints and suggestions.

8.2. GRM process for project stakeholders:

The GRM for all project stakeholders is accessible via TKYB's official website and aims to collect and address grievances of TKYB's clients and all other stakeholders. The responsible body governing this grievance process is TKYB's Internal Control and Compliance Department, which reports directly to the Audit Committee of the Bank. All inquiries/grievances received are directed to the Internal Control and Compliance Department where the relevant inquiry/grievance is reviewed by them and directed to the relevant responsible department to be responded maximum within 30 days unless any other time period is required legally. For the project GRM, all project related grievances that are directed to relevant departments by Internal Control and Compliance department, will also be reported to TKYB PIU for project information and reporting purposes.

The direct and indirect environmental and social performance of the activities of the Bank is reviewed annually with the aim of continuous improvement. Where commercially and legally feasible, the financings approved in conformity with the ESMS are regularly shared with all stakeholders on the website of the Bank according to the risk categories. Any party that is directly and/or significantly affected by the Bank's operations and financing activities may submit grievances to the Bank through its several different channels;

The GRM Forms are available both in Turkish and English;

English link: <https://kalkinma.com.tr/en/contact-us/contact-information>

Turkish link: <https://kalkinma.com.tr/tr/bize-ulasin/iletisim-bilgileri>

Website: <https://kalkinma.com.tr/en/about-us/environmental-development/environmental-complaint-mechanism>

Fax: By sending fax through +90 (216) 6301815-0216 6346145

E-mail: By sending e-mails to the surdurulebilirlik@kalkinma.com.tr

Postal mail: By applying to the Bank with a petition

Additionally, International Bank GRM's are embodied through available links into the TKYB's grievance mechanism. All received grievances are documented systematically, responded in a timely manner and reported to the upper management periodically. The Bank also may require from its clients the disclosure of relevant E&S information and the establishment of a grievance redress mechanism associated with the activities it finances.

The project PIU will be the designated department for reporting all project related inquiries that will be directed and shared by Internal Control and Compliance Department and will simultaneously keep the records and reports of all grievances. PIU will be informed in each of these cases:

- Submission and recording of project related grievance
- Preparation of draft response by relevant department
- Approval of legal opinion
- Completion of complainant response

Internal Control and Compliance Department documents the actions and counter actions taken, and the responses provided to the applicant/complainant, including for project grievances and report to Audit Committee, Board of Internal Auditors and CEO on a monthly basis. These monthly reports related to project grievances will be shared with TKYB PIU for project reporting purposes.

Project GRM will be used to submit complaints related to the overall management and implementation of the project, including: violation of project policies, guidelines, or procedures, including those related to child labor, health and safety of workers, work place harassment (mobbing, sexual harassment etc.). The GRM will also allow submission of anonymous grievances. The attached grievance form in Annex 1 will be utilized in the project and allow submission of anonymous grievances.

Step 1: Submission of grievances

Existing GRM has four different channels to receive grievances:

- a) Complaint form: By filling complaint form (<https://kalkinma.com.tr/en/contact-us/contact-information>)
- b) Fax: By sending fax through +90 (216) 6301815-0216 6346145
- c) E-mail: By sending e-mails to the Bank and staff
- d) Postal mail: By applying to the Bank with a petition

In case a compliant would like to submit a grievance via telephone, he/she will be directed to fill in the compliant form on the website.

Complainant can also categorize the grievance by project name (When it is applicable as World Bank Formal Employment Creation Project or World Bank Emergency Firm Support Project or others) via a drop-down menu in complainant form.

When the grievance form is completed with the subject and other information required, it is delivered to Internal Control and Compliance Department to be recorded, classified and communicated with other relevant departments to be responded. All grievances regardless of the channel received must be delivered to Internal Control and Compliance department and recorded in the same day of receipt.

In addition to the project specific TKYB GRM, the national grievance mechanism will be one of the tools that the project GRM will feed from. TKYB PIU may receive formal requests and grievances through the Presidential Communication Center (CIMER) on different types of complaints related to the project. In practice, CIMER (Phone: 150, web: <https://www.cimer.gov.tr/>) is only available to Turkish citizens. TKYB PIU to timely inform the project on taking corrective actions.

Step 2: Recording of grievance

Once a grievance is received, the Internal Control and Compliance Department is responsible for recording, directing, ensuring and controlling those grievances are replied within required time periods and reporting the analysis of grievances in terms of category and quantity to the Audit Committee and CEO. In the cases of project related grievances, these reports will be shared with TKYB PIU on a monthly basis. Internal Control and Compliance Department will also inform PIU about each recording of project related grievance at the same day of submission.

Step 3: Investigating the grievance and preparing the draft response

Once the project-specific grievances directed from Internal Control and Compliance Department to the related department and TKYB PIU, the related department is responsible for preparing a draft response letter and inform Internal Control and Compliance Department and PIU. Before preparing the draft response, related department will communicate the initial response informing about the acknowledgement of the submission of the grievance and legal response time. According to TKYB internal regulation for Customer Grievance Management Policy document all responses for customer complaints must be reviewed by the Department of Legal Counselor. The related department prepares the draft response and proceeds to receive legal opinion.

Step 4: Complainant response within 30 days

The draft response will be reviewed and revised according to legal opinion and all internal approval procedure will be completed before communicating the final response by the related department. The response for the grievance is given from the same channel that the complaint was received. All project-related responses will be answered by related department and PIU will be informed about the response in detail. All grievances should be responded within 30 days provided that the legal period is not exceeded.

After all possible redress has been proposed to the complainant, and the complainant is still not satisfied with the proposed resolution, they shall be able to seek the legal recourse by means of judicial system and remedies.

Information about the project's GRM will be publicized as part of the initial feedback consultations in the project and information about the GRM will also be posted online on the TKYB website.

8.3. Monitoring and Reporting Grievances

The TKYB PIU's GRM focal point, , (Social Specialist in the Sustainability Department), will be responsible for all project related grievances:

- Analyzing the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GRM mechanisms to the Project Coordinator at the PIU.

Semi-annual progress reports to be submitted by the PIU shall include a section related to GRM which provides updated information on the following:

- Status of GRM implementation (procedures, training, budgeting etc.),
- Qualitative data (gender disaggregated) on number of received grievances \ (applications, suggestions, complaints, requests, positive feedback),
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved,
- Level of satisfaction by the measures (response) taken,
- Any correction measures taken.

Results will be posted on the TKYB website.

8.4. The World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

9. MONITORING AND REPORTING

Monitoring and Evaluation of the SEP will focus on monitoring the progress on the following indicators: (i) Number of annual grievances according to gender (both directly received by TKYB and through other GRMs) received and how they have been addressed and (ii) Number of stakeholders involved in consultations and other project SEP related activities.

Stakeholder engagement activities will be periodically monitored and evaluated by the Project Coordinator of the PIU. The PIU will prepare semiannual progress reports to be shared with the World Bank. TKYB PIU will maintain a simple database and activity file detailing all public consultation, disclosure information and grievances collected throughout the project, which will be available for public review on request. Through regular reports and information also received from TKYB PIU will ensure that records of all stakeholder engagement activities (conducted either by TKYB) are kept in the database which will include dates, venues, attendees, objectives and outcomes. For each consultation meetings attendance lists will be prepared and signed, and whenever possible photographs will be taken and recorded. The reports will present all stakeholder engagement and consultations made, grievances and resolutions, new stakeholders and progress on partnership and plans for the next quarter and longer-term plans.

10. SEP DISCLOSURE

In line with Stakeholder Action Plan, TKYB will disclose and conduct consultation meetings with a participatory approach to inform key stakeholders such as employees of SMEs, LEs, vulnerable group members, Chambers of Commerce and Industry, local NGOs and other parties such as The Ministry of Finance and Treasury (MoFT), The Ministry of Industry and Technology (MoIT), The Ministry of Labor, and Social Services (MoLSS), Social Security Institution (SGK), other training providers and government agencies and Presidency of Republic of Turkey prior to project implementation. The SEP disclosure meeting invitation list will record as presented format in **Table 7**. The detailed minutes of meetings recording format is provided in Annex 2.

Table 7. Template of the SEP Disclosure Meeting List

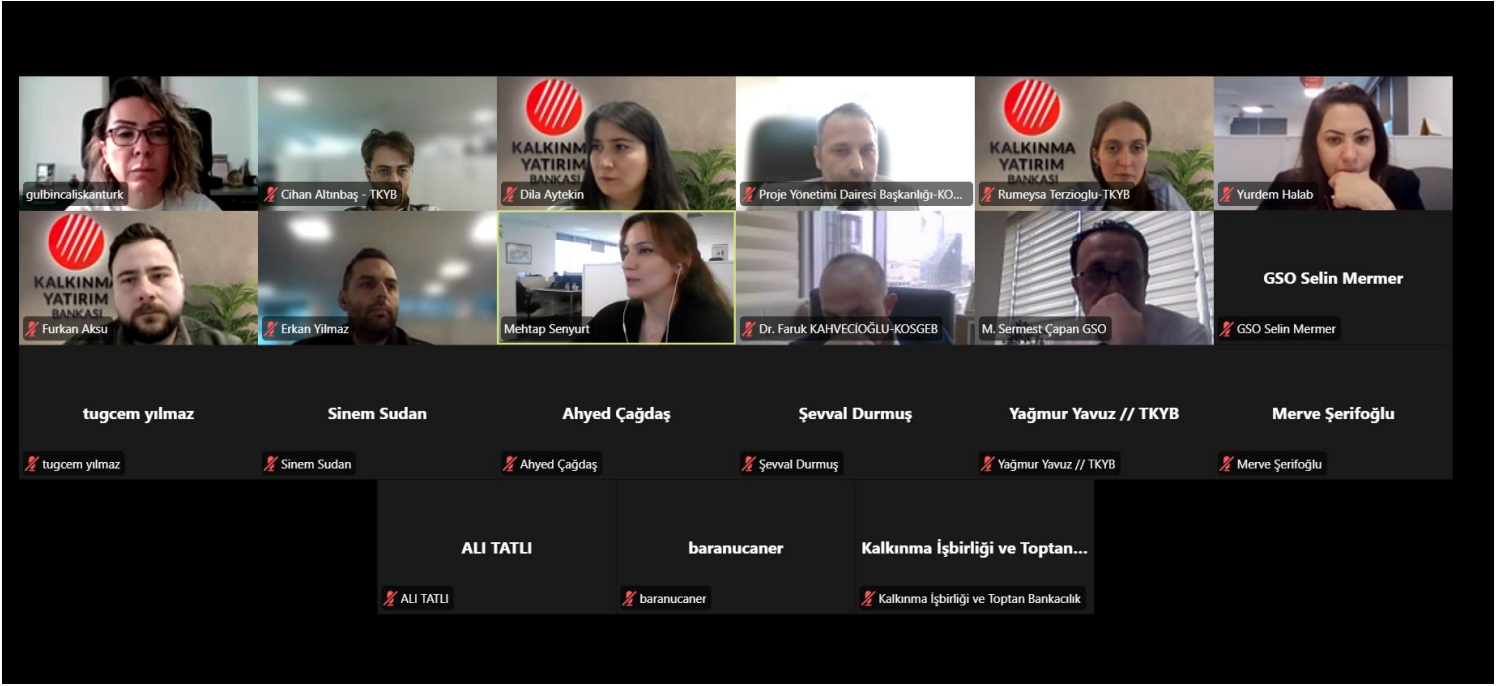
TKYB WORLD BANK FORMAL EMPLOYMENT CREATION PROJECT SEP DISCLOSURE MEETING INVITATION LIST			
.....2025; 1.SESSION; at			
INVITATION LIST			
<u>Name of the Authorities, Institutions and Organizations</u>	Participant	Status	# of Participants
<i>All letter of invitations is sent to institutions via electronic communication system and postal service.</i>			

ANNEX 1. SEP DISCLOSURE MEETING PHOTO

ANNEX 2. SAMPLE OF GRIEVANCE FORM AND GRIEVANCE CLOSEOUT FORM

ANNEX 3. MINUTE OF MEETINGS TEMPLATE OF SEP CONSULTATION

ANNEX 1. SEP Disclosure meeting photo



ANNEX 2. Sample Grievance Form and Grievance Closeout Form

GRIEVANCE FORM			
Project Name	Complainant Status		Grievance Subject/Category
Name of person receiving grievance:			Date:
Title: Ms./Mr.			
INFORMATION ABOUT COMPLAINANT		Ways of Receiving Grievance	
<i>(This section may not be filled if the complainant wishes to remain anonymous but in any case an email for communication purpose must be provided)</i>			
Name		Surname	
Gender		Phone	☐
Phone number		Information Meetings	☐
Address		Application to Office	☐
District/Neighborhood		Mail/e-mail	☐
Email		Field visit	☐
Signature (if possible)		Other:	☐
DETAILS OF GRIEVANCE			
GRIEVANCE CLOSEOUT FORM			

ASSESSMENT OF THE GRIEVANCE		
Corrective Action Required:	☐ YES	☐ NO
	Please describe the action if it is required to close-out the case	
RESULT		
CLOSEOUT <i>This part will be filled in and signed by the complainant and the complaint evaluation committee when the corrective action or file is closed-out. (Instead of taking the signature of the complainant, receipt or other supplementary documents can be attached to the form in order to verify that the file has been closed-out.)</i>		
Responsible Person	Complainant	
Name-Surname	Name-Surname	
Date and Signature	Date and Signature (If possible)	

ANNEX 3. SEP Consultation Meeting Minutes Template

TKYB-World Bank Formal Employment Creation Project Stakeholder Disclosure Meeting Minutes

Date:

Place:

Participants:

SESSION-I – (Between–)

Name of the Speaker and Title with intuitions:

SESSION-II – (Between –)

Name of the Speaker and Title with intuitions:

CONCLUSION AND SUGGESTIONS THAT WILL BE CONSIDERED DURING PROJECT IMPLEMENTATION

1. Name of the intuitions and its comments