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## STAKEHOLDER ENGAGEMENT PLAN

### PURPOSE SCOPE

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with the Turkish regulatory framework, with IFC Performance Standards, IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements and OPIC Environmental and Social Policy Statements and EDC. The purpose of the plan is to define the procedures for the implementation and management of relations with Stakeholder during the Project life cycle. This plan represents an integration and revision of the Stakeholder Engagement Plan included in the Environmental and Social Assessment study.

### APPLICATION

This management plan applies to the entire Project lifespan, including construction, commissioning and operation phases. It applies to construction work activities under the control of SPV, EPC Contractor and Subcontractors and to all KİP employees.

The Stakeholder Engagement Plan is a working document that will be revised and updated on an as-needed basis during the development of the Project, particularly following changes in Project activities, phases, stakeholder identification and engagement program.

### DEFINITIONS

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or “KİP” or simply “Project”):	Kocaeli Integrated Health Campus Project, being executed by SPV or its affiliates
EPC Contractor (or simply EPC):	Gama – Türkerler Kocaeli Adi Ortaklığı & Gama Türkerler Dubai
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the EPC Contractor’s personnel
Environmental and Social Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the environmental, social, health and safety aspects of the KİP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance
Guidelines to EPC Contractor	Guidelines to EPC Contractor for the development of its own ESMS and associated EPC Contractor Procedures appropriate to the nature and scale of the Project are contained in SPV ESMS documentation. SPV ESMS documentation, identify also minimum requirements and specific responsibilities for EPC Contractor in line with the EPC contract
Construction Site	The Construction Site includes all areas impacted in any manner by the construction activities.
Environmental and Social Management Plans (ESMPs)	Plans issued by SPV addressing significant Environmental and Social aspects (as identified in the ESA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.

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EPC Contractor Procedure	A procedure to be prepared by EPC Contractor, to be used by EPC Contractor to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.
Grievance	A grievance is a concern or a complaint raised by an individual or a group within communities affected by company operations
Complainant	Complainant of a grievance can be an individual, a family, a group of people, community groups, NGOs or local governments (as represented by muhtars of villages/neighborhoods or mayors)
Affected Persons and Community Stakeholder	An individual or a group within communities affected by company operations  Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.
Vulnerable group	The disadvantaged or vulnerable status of a group or individual can be due to race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. Engagement activities have to ensure the involvement of these groups, as they may be harder to reach out to and may be directly and differentially or disproportionately affected by the Project impacts because of their status.

**ACRONYMS**

<b>KİP</b>	Kocaeli Integrated Health Campus Project
<b>SPV</b>	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
<b>Golder</b>	Golder Associates Turkey Ltd. Şti.
<b>BAT</b>	Best Available Technology
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EDC</b>	Export Development Canada
<b>EIA</b>	Environmental Impact Assessment
<b>EHS</b>	Environmental, Health and Safety
<b>EPC</b>	Engineering Procurement and Construction
<b>EPRP</b>	Emergency Preparedness and Response Plan
<b>ES</b>	Environmental and Social
<b>ESHS</b>	Environmental, Social Health and Safety
<b>ESA</b>	Environmental and Social Assessment
<b>ESMP(s)</b>	Environmental and Social Management Plan(s)
<b>ESMS</b>	Environmental and Social Management System
<b>ESAP</b>	Environmental and Social Action Plan
<b>EU</b>	European Union
<b>GHG</b>	Greenhouse Gas
<b>GIIP</b>	Good International Industry Practice
<b>HS (or OHS)</b>	(Occupational) Health and Safety
<b>IFC</b>	International Finance Corporation
<b>ISO</b>	International Organization for Standardization
<b>IFI</b>	International Finance Institutions
<b>KPI</b>	Key Performance Indicators
<b>OHSAS</b>	Occupational Health and Safety Assessment Scheme
<b>OPIC</b>	Overseas Private Investment Corporation
<b>PAP</b>	Project Affected People
<b>PR</b>	Performance Requirement (issued by EBRD)
<b>PS</b>	Performance Standard (issued by IFC)
<b>QRA</b>	Quantitative Risk Analysis
<b>SEA</b>	Stakeholder Engagement Activity
<b>SEP</b>	Stakeholder Engagement Plan
<b>WHO</b>	World Health Organization

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**STAKEHOLDER ENGAGEMENT PLAN****1.0 PURPOSE AND SCOPE OF THE PLAN**

This Management Plan has been developed in accordance with SPV policies, with the commitments undertaken by SPV in the ESA, with Turkish regulatory framework, with IFC Performance Standards (in Particular PS1), IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements (in particular PR10), OPIC Environmental and Social Policy Statements and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The present document provides the principles, objectives and procedures to be followed by SPV to develop a strong and constructive relationship with stakeholders throughout the Project lifecycle, in line with SPV's Policy. This plan represents an integration and revision of the Stakeholder Engagement Plan included in the Environmental and Social Assessment study, submitted in January 2016.

Constructive engagement and continuous dialogue with Stakeholders is an essential part of good business practices and corporate responsibility, and is key to the success of any complex project such as the present one. Therefore, the objective of the SEP is to establish a general framework for building and maintaining positive relationships with Stakeholders in all the development aspects, through the implementation of engagement activities. In addition the Plan describes SPV's roles and responsibilities, as well as how are to be monitored and reported.

The overall objective of the SEP is to explain how the SPV is planning to engage with stakeholders through the course of the Project. The stakeholder engagement is a key activity within projects such as the present one, because it creates an open communication channel with stakeholders, it allows stakeholders to understand significant impacts of the Project and helps the Sponsor address local expectations and incorporate feedback in the project design, overall fostering the achievement of a sound and comprehensive project. SEP presents a plan for consultation designed to:

- Provide timely information about the project and its potential impacts to project affected people ("PAP") and other stakeholders;
- Provide opportunities to those groups to voice their opinions and concerns in a way that is most appropriate to their circumstances; and
- Provide an opportunity for feedback to, and discussion with, those settlements concerning measures proposed.
- Incorporating local knowledge during the entire Project life cycle, by taking in account bottom up information and feedback provided by local communities; and
- Timely and effectively responding to community concerns regarding the issues such as employment of the local workforce reserve in the construction and operation phases, disruption to daily life, safety issues, disturbances due to noise or dust, and other environmental and social issues.

Social Engagement must be performed according to a set of principles, which overarch all activities and provide general guiding standards to which SPV, the EPC Contractor, Subcontractor and other contractors must adhere in order to carry out an appropriate and effective process. The principles are outlined below:

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- **Inclusive:** the SEP will ensure inclusiveness in the engagement with Stakeholders in representation of views, including women, vulnerable and minority groups.
- **Accountable:** SPV will incorporate Stakeholder feedback into the Project or program design, and report back to Stakeholders.
- **Appropriate:** SPV will provide information in a format and language which is readily understandable and tailored to the needs of the target Stakeholder groups.
- **Relevant:** In its engagement with the Stakeholders, SPV will respect local traditions, customs, languages, timeframes and decision making processes.
- **Two-way:** SPV will establish a two-way dialogue with Stakeholders that will give both sides the opportunity to exchange views and information, to listen, and to have their views heard and addressed.
- **Proactive:** In order to avoid any potential risks that might arise in our dealings with the Stakeholder, SPV will be proactive in trying to manage such risks before they occur by offering opportunities for constructive dialogue.
- **Transparent:** SPV will engage with Stakeholders in an open process, with transparent purpose, goals, accountabilities, expectations and constraints. SPV will provide Stakeholders with meaningful information on relevant aspects of project activities.

These principles have to be followed during all engagements with Stakeholders and are applicable for all Project functions and contractors.

SPV ensures that the Plan will be implemented through the entire project cycle.

This Management Plan applies to normal operating conditions during the Site construction activities and does not specifically address any emergency situation and spill contingency.

The Stakeholder Engagement Plan is a working document that will be revised and updated on an as-needed basis during the development of the Project, particularly following changes in Project activities, phases, stakeholder identification and engagement program.

**STAKEHOLDER ENGAGEMENT PLAN****2.0 BACKGROUND POLICIES AND STANDARDS****2.1 National standards and regulations**

The requirement to perform Stakeholder Engagement Activities during the EIA process in Turkey is defined by the Turkish Regulation on Environmental Impact Assessment (EIA) (OG No. 29186 dated 25.11.2014).

The KİP is legally exempt from the requirement of an official Environmental Impact Assessment process. Although the overall Project is legally exempt from the requirement of an official EIA process, an ESA study, which will be based on the latest design data in accordance with the pertinent international regulations and guidelines including a comprehensive assessment of certain environmental and social issues, is required by the International Finance Institutions which are EBRD, OPIC and EDC.

**2.2 International standards**

Most IFI standards guideline documents require implementing project information disclosure and Stakeholder engagement activities. The present document has been prepared in accordance to the policies and standards listed in the table below.

Source	Document Title
The Equator Principles Association	<a href="#">The Equator Principles, June 2013</a>
IFC - International Finance Corp.	<a href="#">IFC Performance Standards (PS) and Guidance Notes (GN)</a>
IFC - International Finance Corp.	<a href="#">IFC PS1 and GN1: Assessment and Management of Environmental and Social Risks and Impacts</a>
IFC - International Finance Corp.	<a href="#">IFC PS2 and GN2: Labor and Working Conditions</a>
IFC - International Finance Corp.	<a href="#">IFC PS4 and GN4: Community Health, Safety, and Security</a>
IFC - International Finance Corp.	<a href="#">IFC PS5 and GN5: Land Acquisition and Involuntary Resettlement</a>
IFC - International Finance Corp.	<a href="#">IFC PS8 and GN8: Cultural Heritage</a>
IFC - International Finance Corp. (2007)	<a href="#">Stakeholder Engagement: A good Practice Handbook for Companies Doing Business in Emerging Markets</a>
EBRD – European Bank for Reconstruction and Development	<a href="#">EBRD PR1: Assessment and Management of Environmental and Social Risks and Impacts</a>
EBRD – European Bank for Reconstruction and Development	<a href="#">EBRD PR2: Labor and Working Conditions</a>
EBRD – European Bank for Reconstruction and Development	<a href="#">EBRD PR10: Information Disclosure and Stakeholder Engagement</a>
OPIC - Overseas Private Investment Corporation	<a href="#">OPIC - Environmental and Social Policy Statement</a>
International Organization for Standardization	ISO 14001:2004 - Environmental management systems -- Requirements with guidance for use
OHSAS Project Group	OHSAS 18001 - Occupational health and safety management systems – Requirements

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**STAKEHOLDER ENGAGEMENT PLAN****2.3 Source documents**

This section presents source documents, i.e. documents where SPV commitments are sourced from and that are the trigger for the development and implementation of the ESMPs and in general of the ESMS documentation. They are in turn based on Turkish regulatory framework, EBRD Performance Requirements and IFC Performance Standard and Guidelines.

Document ID	Document Title
ESA Report	Environmental Social Assessment (January, 2016)



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### 3.0 ROLES AND RESPONSIBILITIES

**SPV Management** has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SPV's responsibility. SPV Management is responsible for:

- final approval of this Plan;
- taking appropriate actions to address major Non-Conformities, based on audit reports, performance monitoring reports and on HSE Manager proposed approach and actions.

**EPC Contractor and Subcontractors:** The establishment and implementation of the Stakeholder Engagement Plan is under the responsibility of SPV. The EPC Contractor are not allowed to implement engagement activities directly but have to collaborate with SPV within the framework of the Plan. SPV and EPC have to liaise regularly to discuss on status of activities and on emerging issues that should be included in engagement activities. If Stakeholder engagement activities must be implemented in collaboration with the EPC Contractor, the CRO will liaise with EPC to discuss on planned activities and level of collaboration needed.

The EPC Contractor have to report to SPV on a periodic basis regarding general activities progress so that the information can be disclosed to Stakeholders during the planned activities.

Reports have to be submitted to SPV on a six monthly basis and have to contain the following information:

- Progress on the Project, including statistics, description of phases completed and milestones planned in the phase;

Information and data on workers' grievances, as detailed in the Grievance Mechanism Procedure and Employment and Procurement Plan.

**Community Relation Officer (CRO):** the Community Relation Officer is appointed for the overall implementation of the social management activities of the Project. He/she reports to the Construction Director and is responsible for the implementation and management of the SEP and in this respect acts as an interface between SPV, EPC Contractor and the Local Community. The CRO is responsible for implementing and organizing engagement activities described in this plan. The CRO is also responsible for monitoring the Plan implementation and of proposing corrective actions and reports to the HSE management. The CRO is furthermore responsible for:

- ensuring that this procedure is up to date and appropriate to the nature and scale of the KIP;
- proposing to Construction Director, if necessary, amendments and/or updates to this procedure and issuing revisions;

**Construction Director** is responsible for:

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- proposing to SPV Management, if necessary, amendments and/or updates to this procedure and issuing revisions;
- coordinating the involvement of SPV Management in organizing engagement activities if and when necessary;
- participating in Stakeholder Engagement Activities if and when necessary; and
- ensuring the CRO is provided the resources for performing the duties assigned to her/him.

**HSE Manager – SPV** is responsible for:

- programming inspections and audit activities to ensure the correct implementation of this Plan;
- addressing Non-Conformities through the definition of Preventive/Corrective actions;
- bringing major Non-Conformities immediately to the attention of SPV Management.

**HSE Manager EPC** support and advice the CRO on an “as needed” basis and based on their competences. Moreover, they are responsible for:

- Establishing an inspection/audit scheme and review the results of inspections/audits and identify any issues and deficiencies, to be brought to the attention of the management;
- Providing advice to the Community Relations Officer on an as-needed basis.

## 4.0 MANAGEMENT METHODS AND MITIGATION MEASURES

The establishment and implementation of a Stakeholder Engagement Plan for Projects of this type is required according to the standards of International Financing Institutes. In addition the commitment to build strong relations with local communities is found in the Project ESA, which considers it a measure to address, manage and mitigate social impacts identified throughout the study. The list of requirements and commitments is presented in the table below.

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsibilities
SEP-01	IFC-PS1 §01 EBRD PR1 EBRD PR10	An effective Environmental and Social Management System (ESMS) is a dynamic and continuous process initiated and supported by management, and involves engagement between SPV, its workers, local communities directly affected by the project (the Affected Communities) and, where appropriate, other stakeholders.	Throughout entire project life cycle	N.A.	SEP up to date	SPV
SEP-02	IFC-PS1 §27, ESA 6.0 EBRD PR10	SPV will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, SPV will make any reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.	Throughout entire project life cycle	N.A.	SEP developed and implemented effectively All affected communities involved	SPV
SEP-03	IFC-PS1 §29, ESA – 6.0 and 9.0 EBRD PR10	Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. SPV will provide Affected Communities with access the relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.	Throughout entire project life cycle	N.A.	Relevant project information disclosed	SPV
SEP-04	IFC-PS1 §30 EBRD PR10	When Affected Communities are subject to identified risks and adverse impacts from a project, SPV will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows SPV to consider and respond to them. The extent and degree of engagement required by the consultation process should be commensurate with the project's risks and adverse impacts and with the concerns raised by the Affected Communities. Effective consultation is a two-way process that should: (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise; (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities; (iii) focus inclusive engagement on those directly affected as opposed to those not directly affected; (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and (vi) be documented. SPV will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If SPV have already engaged in such a process, they will provide adequate documented evidence of such engagement.	Throughout entire project life cycle	N.A.	Consultation process in place when the case	SPV
SEP-05	IFC-PS1 §36, ESA – App. N EBRD PR10	SPV will provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.	On a yearly basis during construction	N.A.	Periodic reporting system for the affected communities in place	SPV

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### *4.1 General Principles for Engagement*

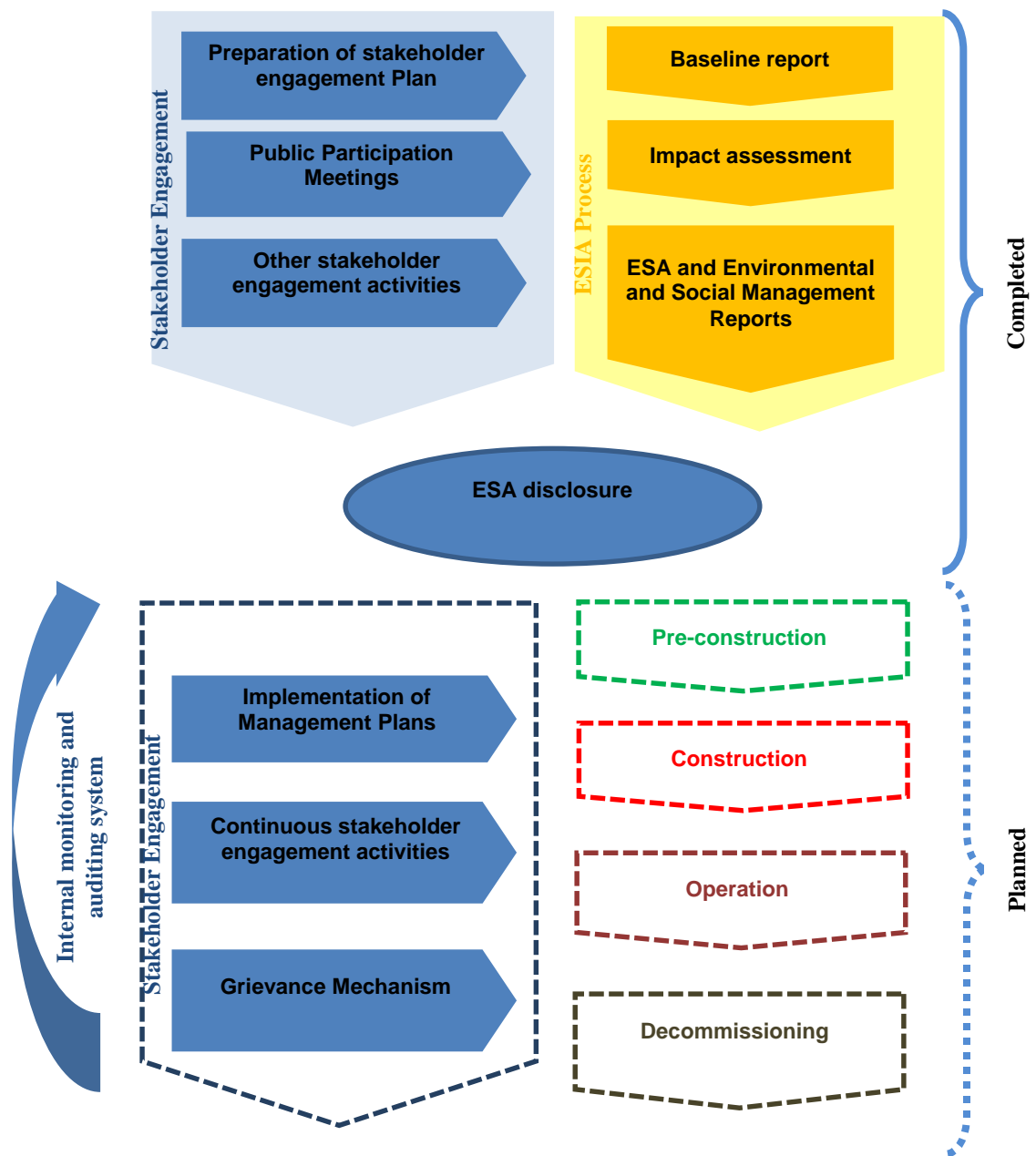
The results of stakeholder engagement has been integrated into the specialist environmental and social baseline studies undertaken for the ESA. Stakeholder issues will be considered in the ESA and in the Project planning and design.

Stakeholder engagement during the ESA will include a minimum of two formal periods of consultation:

- Stakeholder engagement during baseline studies, including consultation during the initial scoping site visits and;
- Stakeholder engagement during impact assessment, including consultation on the draft ESA report disclosure of the Project and baseline studies.

Stakeholder engagement is an underlying process that continues throughout the ESA and beyond. The various phases of the ESA depicted in the below figure largely correspond to the first two stages describe below, but it should be noted that the stakeholder engagement will continue into the construction and operations stages. Though there will be less activities and intensity of engagement during operation, stakeholder engagement will be a Project-long process.

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**4.2 Stakeholder Identification**

Stakeholder identification is a key step in managing the overall Stakeholder Engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process.

Stakeholders are defined as individuals or groups who can affect, or affected by, or have a legitimate interest in the Project results and performance. Some stakeholders are obvious, such as government authorities responsible for permitting, local communities adjacent to the Project and other PAP.

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The preliminary stakeholder identification intends to include other groups, organizations and individuals that may not appear to be directly involved. The health professionals and educators, for example, may not be directly involved in the Project development, but are familiar with the existing community and socio-economic dynamics and can help improve the quality of impact analysis. Such consultation is combined with the baseline information collection. Consideration of feedback from such stakeholders helps to align mitigation and social investment with existing initiatives and the actual socio-economic needs.

Expanding the stakeholder identification beyond government and local residents increases the likelihood that a wide representation of interests and opinions will be a priority in the development of the Project.

Stakeholders will be recorded throughout the life of the Project in the following categories:

- Governmental authorities at the national, regional and local levels (Ministry of Health, Provincial Council);
- Multi-national and international organizations (EBRD, IFC, EU);
- Non-commercial, non-governmental and public organizations particularly those with an interest in environmental and social issues at the international, national, regional and local levels;
- Interest groups, such as universities and their foundations, cooperatives, local business establishments, business associations, chambers of commerce and others;
- PAPs including non-organized groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, ethnic minorities, etc.). PAPs include land owners and residents that may use communal land;
- Project employees;
- Media and;
- Directly affected community members (living nearby the Project area, patients, hospital employees, visitors etc.)

The initial stakeholder identification for the Project based on the project knowledge and common literature are illustrated in Appendix 1.

### **4.3 Engagement methods**

This section reports the methods that will be used throughout the Stakeholder engagement process and identifies how they will be used in the different phases of the Project development, based on the previous engagement experience within the KIP. Each activity allows to reach specific engagement objectives and to engage with different groups of stakeholders, implying various commitment levels from SPV. The CRO and SPV management are therefore in charge of deciding which activities are more appropriate to the different Project phases, based on the framework and indications provided below. The recommended Stakeholder Engagement Activities are the following:

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**1. Public meetings open to all Stakeholders:** This activity allows involving and reaching out to a wide range of Stakeholders. Due to the interactive approach, concerns and questions from Stakeholders can be discussed directly with SPV and possible answers given during the meeting. However, public meetings can also lead to certain groups prevailing on others during the discussion and to the risk of covering only general or recurring issues. In addition, there is a risk that the same Stakeholders participate or that numbers of attendees dwindle in time. In such cases, SPV should consider implementing different activities.

Announcements of public meetings will be made at least two weeks before the meeting by sending written communication to all Stakeholders that have previously participated in SEA and are present in the Register. In addition brochures or posters will be distributed to community representatives and made available in specific places such as the community center. In addition, the CRO should liaise directly with community representatives to inform them on the meeting. If deemed necessary, SPV should organize a transport system to allow all Stakeholders, even those with limited mobility, to participate in the meeting.

The meeting will be chaired by the CRO and representatives of SPV management and of the EPC should be present. Information provided orally during the meeting also will be provided in writing under the form of information sheet or brochure. Attendance of Stakeholders will be registered on a specific form during the meeting.

Once the meeting is over, the CRO is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

**2. Group meetings with community members** that have been identified as being representative of relevant groups (muhtars and tourism representatives, or NGO representatives). In this case, SPV will organize smaller meetings with specific Stakeholders that are particularly relevant within the scope of the Project and that have proven to be proactive and representative during previous activities. This activity allows focusing on specific issues and possibly finding agreed solutions among parties. However, this meeting is closed therefore does not allow full participation to all Stakeholders, possibly leading to the perception in other Stakeholders of being excluded. Announcement of the meeting will be done by the CRO by directly liaising with the selected Stakeholders. If deemed necessary, SPV should organize a transport system to allow all Stakeholders, even those with limited mobility, to participate in the meeting.

The meeting will be chaired by the CRO and representatives of SPV management and of the EPC should be present. Information provided orally during the meeting also will be provided in writing under the form of information sheets or brochures. Attendance of Stakeholders will be registered on a specific form during the meeting. Once the meeting is over, the CRO is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

**3. Open Door event:** This activity consists in inviting the public to visit the Site, to directly present the activities that are occurring onsite. This would be typically done during preconstruction and at the end of construction phase.

An Open Door typically includes an introductory meeting, a tour of selected Site areas accompanied by Company staff and a final Q&A session. The activity has to be carefully planned in order to ensure full

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safety of attendees and therefore has to be organized with the support of the appropriate resources. Benefits of this activity include the fact that public can see in first hand site activities, possibly reducing undue fears and better understanding the project and its nature. In addition, Open Door events improve the Company's reputation of conducting its operation with a transparent and proactive approach.

Announcements of the Open Door will be made at least two weeks before the event by sending written communication to all Stakeholders that have previously participated in SEA and are present in the Register. Meeting details will be posted on the SPV website and brochures or posters will be distributed to community representatives and made available in specific places such as the community center. In addition, the CRO should liaise directly with community representatives to inform them on the meeting. If deemed necessary, SPV should organize a transport system to allow all Stakeholders, even those with limited mobility, to participate in the meeting. Due to safety issues linked to this activity, interested Stakeholders have to confirm their presence and only those that have responded will be admitted. The event will be led by the CRO with the support of technical experts who can explain in better detail certain aspects of the Project. Attendance of Stakeholders has to be registered on a specific form during the meeting. Once the meeting is over, the CRO is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

**4. Newsletters:** This approach is less time-consuming for SPV and allows reaching out to a wide array of Stakeholders. The newsletter will be sent to all Stakeholders that are in the register and will be posted on the SPV website. In addition, printed copies will be posted on a visible bulletin board in locations such as the community center and sent to specific Stakeholders for further distribution. The newsletter alone however cannot be considered a sufficient engagement method because it is a one-way communication tool and does not allow direct interaction between Stakeholders and SPV.

**5. Phone calls:** On a quarterly basis, the CRO will call representative stakeholders to inform them on progress of activities and to discuss possible critical issues that have emerged. This tool is simple to implement and allows creating a strong connection with certain stakeholders and identifying possible problems together in advance.

Previous stakeholder engagement studies and the outcomes of the ESA allow identifying broad issues linked to Project activities that seem to be more relevant to stakeholders. This information is a useful in supporting the preparation and structuring of the SEAs, as it indicates on which subject it is likely that Stakeholders will want to discuss and be informed. Key Issues will evolve in time, based on the status of Project activities and interests of stakeholders, therefore the list will be updated in time based on outcomes of SEAs.

### **4.4 Stakeholder Engagement Program**

The main objective of the program is to maintain ongoing positive community relations and ensure that all interested Stakeholders/parties are kept informed on all Project activities throughout the entire Project lifecycle.



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The SPV and in particular the CRO is responsible for organizing and implementing these relations and engagement activities in cooperation with SPV Management. Activities will be performed during both the construction, operation and decommissioning phase, at different levels of intensity.

The CRO is responsible for keeping track of all SEAs organized and implemented, by filling in the Stakeholder Engagement Activity Register and the Stakeholder Engagement Activity form at the conclusion of each activity.

The Register has to be filled in also for past activities performed during the ESA phase. In addition for each SEA implemented the CRO has to create a dossier in which all relevant material used or prepared for the activity (announcements, posters, brochures, presentations, attendees sheet, pictures, etc.) is stored.

### **A. Previous Activities**

As reported in the ESA's SEP, SPV has already performed a number of SEA activities during the ESA process, as required by IFI Standards. A public meeting has been organized at 30 May 2015. Detailed information on these meeting, including attendees, issues covered and outcomes can be found in the Appendix E of the ESA Stakeholder Engagement Plan.

Moreover, a social baseline study has been conducted during the ESA studies by in-depth interviews and focus group meetings. Detailed information about these activities can be found in the Appendix E of the ESA.

### **B. Construction Phase**

SPV will hold regular engagement sessions at least on a quarterly basis with the community and the interest groups throughout the construction period; this is important to ensure that a continuous dialogue with the affected communities is maintained, by keeping them informed and sharing views and ideas. In addition, these activities will be the occasion to update Stakeholders on the implementation and outcomes of the Grievance Mechanism. Based on the previous engagement experience within the SPV, the following activities can be implemented.

Regardless of which engagement activity is performed, at minimum the following information on the Project will be disclosed to Stakeholders:

- Progress of activities and updated schedule of activities, including changes to schedule and forthcoming activities;
- Potential disturbances, hazards and community safety issues associated with construction, and planned mitigation measures;
- Environmental performance against KPI;
- Critical issues faced and corrective actions implemented;
- Indications on Grievance Mechanism performance;

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- Refresh on ways to get in touch with SPV and channels for grievance submission;
- Any other project-related information considered relevant for Stakeholders.

The CRO, in agreement with the Management, will decide which activity is more appropriate and effective to be implemented, based on outcomes of previous activities and status of construction works. Activities should be implemented with a clear strategy and schedule in mind in order to ensure that the implementation of different activities does not create confusion in Stakeholders. Regardless of the approach chosen, at least one public meeting has to be organized each year, possibly 2-4 weeks after the disclosure of the yearly Report, so that results of the report can be discussed with Stakeholders on this occasion.

### **C. Operation Phase**

The operation period will be characterized by a decrease of activities on the site, which will remain stable during the subsequent years of operation. Accordingly, the SEAs presented above will be performed with less intensity. At least one public meeting will be organized within the first semester after start of operation, to inform Stakeholders on progress of activities, and then at least once a year, possibly 2-4 weeks after the disclosure of the yearly Report, so that results of the report can be discussed with Stakeholders on this occasion.

Regardless of which engagement activity is performed, at minimum the following information on the Project will be disclosed to Stakeholders:

- Progress of activities and updated schedule of activities, including changes to schedule and forthcoming activities;
- Potential disturbances, hazards and community safety issues associated with construction, and planned mitigation measures;
- Environmental performance against KPI;
- Critical issues faced and corrective actions implemented;
- Indications on Grievance Mechanism performance;
- Refresh on ways to get in touch with SPV and channels for grievance submission;
- Any other project-related information considered relevant for Stakeholders.

Announcements of public meetings will be made at least two weeks before the meeting by sending written communication to all Stakeholders that have previously participated in SEA and are present in the Register. Meeting details will be posted on the SPV website and brochures or posters will be distributed to community representatives and made available in specific places such as the community center. In addition, the CRO will liaise directly with community representatives to inform them on the meeting. If deemed necessary, SPV should organize a transport system to allow all Stakeholders, even those with limited mobility, to participate in the meeting.

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The meeting will be chaired by the CRO and representatives of SPV management should be present. Information provided orally during the meeting will also be provided in writing under the form of information sheet or brochure. Attendance of Stakeholders will be registered on a specific form during the meeting. Once the meeting is over, the CRO is responsible for recording information on the Record form and of collecting meeting related material in the dossier.

The CRO, in agreement with the Management, can also decide to implement other forms of engagement on a more frequent basis such as sending out newsletters, organizing open house events or liaising directly with specific Stakeholders. The need and utility of additional SEAs should be assessed based on feedback from previous activities and on the general relation between SPV and Stakeholders.

### D. *Decommissioning phase*

The objective of stakeholder engagement during the decommissioning phase is to reduce the impacts related to closure, especially any environmental legacy issues.

The hospital will be handed over to government for operation after 25 years. The relevant stakeholder engagement activities for decommissioning will be organized by the government authorities.

### E. *SPV contacts*

SPV currently has a corporate website.

<http://www.kohas.com.tr/tr>

Currently main contact person at SPV is Mr. Mesut Doğan Corporate Contractor Manager ([mesut.dogan@gamaturkerler.com.tr](mailto:mesut.dogan@gamaturkerler.com.tr)).

SPV is planning to expend further the web section on environment, including data on environmental and health and safety indicator performances. SPV will also consider creating a specific page on Stakeholder engagement, where outcomes of engagement activities can be documented and monitored, including future reports on sustainability performances and minutes of meetings.

### F. *Timetable*

The following table provides a general framework schedule of Stakeholder engagement activities that SPV will follow, with indication of deadlines or frequency. It is important that the CRO establishes a clear timetable for Stakeholder Engagement Activities to be held throughout project construction and operation, based on this framework. The final schedule then will be shared internally and with Stakeholders during the activities, so that everyone has a clear understanding of opportunities and channels to get in touch with SPV, in addition to the possibilities offered by the Grievance Mechanism.

**STAKEHOLDER ENGAGEMENT PLAN**

Phase	Activity	Deadline or frequency
Construction	<ul style="list-style-type: none"> <li>• Public meeting</li> <li>• Group meeting with selected Stakeholders such as local authorities or any other relevant NGOs</li> <li>• Open House Events</li> <li>• Newsletters</li> <li>• Phone calls</li> </ul>	<p>The following frequency of activities is suggested:</p> <p>Public meeting: at least once a year, possibly shortly after the disclosure or the yearly report.</p> <p>Group meetings: once a year;</p> <p>Open House Events: at the end of construction</p> <p>Newsletters: quarterly</p> <p>Phone calls: quarterly</p>
Operation	<ul style="list-style-type: none"> <li>• Public meeting</li> <li>• Group meeting with selected Stakeholders such as local authorities or any other relevant NGOs</li> <li>• Open Door Events</li> <li>• Newsletters</li> <li>• Phone calls</li> </ul>	<p>A public meeting has to be organized in the first semester after the start of operations; then at least one public meeting per year and other activities on an “as-needed” basis.</p>

**4.5 Grievance Mechanism**

The Grievance Mechanism is an important tool within the framework of the SEP. The objective of the Grievance Mechanism is to demonstrate responsiveness to Stakeholder needs and facilitate a trustworthy and constructive relationship. The Grievance Mechanism is a procedure through which communities, groups and individuals affected by the Project activities can formally communicate their concerns and grievances to the Project Owner and facilitate resolutions that are mutually acceptable by the parties, within a reasonable timeframe. A specific Workers’ Grievance Mechanism is also set up for workers, and their organizations, directly or indirectly employed in the Project construction and operation processes, in order to ensure that they can freely express opinion and complaints.

Due to the importance of this tool, the procedure of the Grievance Mechanism is fully covered in a specific document; detailed information on guiding principles, principles, roles and responsibilities and implementation can be found in this procedure (KIP-ESMS-GRM-001, Grievance Mechanism Procedure)..

**5.0 MONITORING**

Monitoring of the procedure will be done by the CRO, who has to report results of SEAs to the Management, as described below in the reporting section. In particular the CRO will monitor and inform on the performance of activities, and on adherence to the planned timetable.

Implementing strong and effective SEA derives from a series of factors that do not depend entirely on SPV. Therefore, it can be presumably expected that the Plan will have to be amended and refined throughout the Project, based on success of activities and feedback from Stakeholders. An assessment of the effectiveness of the activities implemented has to be done by the CRO mainly using qualitative information, by looking at the “lesson learned” reports on a periodical basis and at the feedback and response from Stakeholders. In addition the level of participation from Stakeholders is a good indicator whether the activities are effective or not.

## STAKEHOLDER ENGAGEMENT PLAN

Based on this assessment the CRO is responsible of identifying corrective actions to be implemented and to propose them to the Management on an “as needed” basis or during periodic meetings. Management will discuss proposals and will decide whether amendments to the Plan should be implemented. The specialized contractor on social issues will be involved as needed in this review process to ensure effectiveness of the corrective actions.

### 6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the ESMS Manual.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SPV HSE Department.

Internal auditing will address:

- The correct implementation of this Management Plan;
- The compliance to the frequency and to the planned schedule of activities indicated in the Plan;
- Timely and effective reporting as indicated in section 7.

During the inspections the audit will address in particular:

- Review of Stakeholder Engagement Activities Record to ensure that record is filled correctly;
- Review of Stakeholder Engagement Activity forms and dossiers to ensure that information and material is filed and registered correctly;
- Review of Stakeholder Register to ensure that the list is continuously updated;
- Review of periodic reports prepared by the CRO to ensure that they are compiled correctly
- Levels of stakeholder participation in activities and of stakeholder satisfaction based on the information presented in the “lessoned learned” section of the SEA Record form.
- Levels of satisfaction to the Grievance Mechanism effectiveness based on the information presented in the “lessoned learned” section of the Grievance Record form.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SPV Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary according to the indications included in “Management Review” of the ESMS Manual.

## STAKEHOLDER ENGAGEMENT PLAN

### 7.0 REPORTING

The outcomes of SEAs will be regularly reported both internally and externally.

#### *7.1 Internal Reporting*

With regards to internal reporting, the CRO is responsible for liaising with management on a regular and on need basis, to inform on general progress of the Plan implementation and to seek for advice when needed.

In addition the CRO will prepare formal periodic reports on a six monthly basis during the construction phase, and the operation phase. Reports have to contain the following information:

- Overall data on number and typology of activities performed;
- Attendance and feedback from Stakeholders;
- Problems and critical issues emerged;
- Status of Grievance Mechanism performance and critical issues emerged;
- Corrective actions taken within the Plan and schedule;
- Decisions to be taken with the management;

Reports will be presented during a six-monthly meeting to the Management and to any other staff deemed necessary. This report constitutes the basis for the monitoring report to be available for the Lenders.

**STAKEHOLDER ENGAGEMENT PLAN**

**APPENDIX 1**

**LIST OF PROJECT STAKEHOLDERS**

**STAKEHOLDER ENGAGEMENT PLAN**

Level	Organization	Relationship with the Project
<b>Governmental Organizations</b>		
<b>National</b>	Ministry of Health ("MoH"), General Directorate of Health Investments	The Project has been proposed by MoH. MoH will be responsible for the provision of medical services during operation phase of the Project.
	MoH, General Directorate of Management Services	
	MoH, Public Hospitals Institution	
	MoH, General Directorate of Health Services	
	MoH, Department of Public Private Partnership	
	MoH, General Directorate of Emergency Health Services	
	MoH, Public Health Agency of Turkey	MoEU has regulatory functions relating to the Project such as the EIA permit and environmental permitting
	Ministry of Environment and Urbanisation ("MoEU"), General Directorate of Environmental Impact Assessment ("EIA"), Permit and Audit	
	MoEU, General Directorate of Environmental Management	
	MoEU, General Directorate of Spatial Planning	
	MoEU, General Directorate of Land Registry and Cadastre	MoLSS may have specific remarks on labour and working conditions, health and safety of the healthcare personal.
	MoEU, General Directorate of Protection of Natural Assets	
	Ministry of Labour and Social Security ("MoLSS"), General Directorate of Labour	
	MoLSS, General Directorate of Occupational Health and Safety	Specific remarks may be given by the Regional Directorate that is related to the regional healthcare labour.
	MoLSS, Social Security Institution	
<b>Regional</b>	Kocaeli Regional Directorate of Labour and Social Security	The governorship is the highest authority in the province representing national government.
<b>Provincial</b>	The Governorship of Kocaeli	The municipality and its relevant departments will have responsibilities relevant to the Project.
	The Greater Municipality of Kocaeli	The organization may have specific remarks on the management of traffic related to the Project.
	The Greater Municipality of Kocaeli, Department of Transport Coordination	These organizations are relevant in terms of provision of health services and healthcare labour in the province.
	Kocaeli Governorship Provincial Directorate of Health	
	Kocaeli Governorship Provincial Directorate of Public Health	
	Kocaeli Province General Secretariat of Public Hospitals	
	Kocaeli Provincial Directorate of Social Security Institution	PDoEUP has regulatory functions relating to the Project such as
Kocaeli Provincial Directorate of Environment and Urbanization ("PDoEU")		



**STAKEHOLDER ENGAGEMENT PLAN**

Level	Organization	Relationship with the Project
		environmental impact assessment permits and environmental permitting.
	Kocaeli Disaster and Emergency Management Directorate	This organization has a function to manage and respond to emergency cases.
	Kocaeli Provincial Directorate of Culture and Tourism	This organization may provide specific remarks related to the archaeological potential of the Project site.
<b>District</b>	İzmit Municipality	The Project site is located in the İzmit District. The Municipality of İzmit is a stakeholder as it would be one of the authorities to grant relevant permits, approvals and consents during the planning, construction and operation of the Project. Other institutions may provide Project and site specific concerns.
	Mukhtar of Tavşantepe Neighbourhood	These stakeholders may have local and specific concerns about the Project
	Mukhtar of Bekirdere Neighbourhood	
	Mukhtar of 28 Haziran Neighbourhood	
	Mukhtar of Malta Neighbourhood	
	Mukhtar of Gündoğdu Neighbourhood	
	Mukhtar of Yeşilova Neighbourhood	
	■ Administratives of Yarbay Refik Cesur Elementary School	These stakeholders may have local concerns in relation to the traffic and the characteristics of the project
<b>Non-Governmental Organizations</b>		
<b>National</b>	Turkish Medical Association	This organization may provide specific remarks related to the Project.
	Trade Union of Public Employees in Health and Social Services	These associations together with the Turkish Medical Association has published a notice on PPPs.
	Association of Social Service Specialists	
	Association of All Technicians of Radiology	
	Turkish Dental Association	

**STAKEHOLDER ENGAGEMENT PLAN**

Level	Organization	Relationship with the Project
	Turkey Trade Union (s) in Health Service Sector such as: <ul style="list-style-type: none"> <li>■ Trade Union of Employees of Health and Social Services</li> <li>■ Trade Union of All Employees of Health and Social Services</li> <li>■ Trade Union of Medical Workers</li> <li>■ Trade Union of Public Employees in Health and Social Service Branch in Turkey</li> </ul>	Trade unions are important stakeholders representing the labour rights of the health sector personnel.
	Turkish Red Crescent	These associations are relevant social organizations working on the different areas of the healthcare sector and may provide specific remarks based on their areas of specialization.
	Turkish Nurses Association	
	Paediatric Nurses Association	
	Oncologic Nurses Association	
	Urology Nurses Association	
	Obstetricians and Nurses Association	
	Turkish Intensive Care Nurses Association	
	Doctors' Rights Association	
	Doctors Association	
	Contemporary Pharmacist's Association	
	Association of Patient's and Patients' Relatives' Rights	
	Association of Health Employees	
	The Health Foundation of Turkey	
	Foundation of Hope in Health	
	Health Tourism Association of Turkey	
	Turkey Confederation of Disabled	Views of these associations are important to understand their expectations.
	Turkey Handicapped Association	
Provincial	Provincial offices of nationwide health sector trade unions	These organizations are representatives of similar national organizations and may provide specific remarks related to the issues in the province.
	Turkish Red Crescent Kocaeli Office	
	Medical Association Kocaeli Office	
	Chamber of Environmental Engineers (Kocaeli Regional Representative Office)	These chambers/associations may provide province-specific and/or site-specific remarks related to the project.
	Chamber of Urban Planners (Kocaeli Office)	
	Chamber of Civil Engineers (Kocaeli Office)	
	Chamber of Architects (Kocaeli Office)	
	Chamber of Geophysics Engineers Kocaeli Office)	
Chamber of Geology Engineers (Kocaeli Office)		
<b>Universities</b>		

**STAKEHOLDER ENGAGEMENT PLAN**

Level	Organization	Relationship with the Project
Provincial	Kocaeli University	The health services provided by the Project make University Medical Faculties a relevant stakeholder.
<b>Provincial Health Institutions</b>		
Regional	Kocaeli State Hospital(s) including: Kocaeli State Hospital İzmit Seka State Hospital	The health services provided by the Project make the State Hospitals a relevant stakeholder.
<b>Community Members</b>		
Regional	Kocaeli City Community	Community members may provide concerns about the Project
Provincial	İzmit District Community Members	Community members may provide concerns about the Project
Project	Tavşanlı Neighbourhood Community Members	Community members may provide concerns about the Project
	Bekirdere Neighbourhood Community Members	
	28 Haziran Neighbourhood Community Members	
	Malta Neighbourhood Community Members	
	Gündoğdu Neighbourhood Community Members	
	Yeşilova Neighbourhood Community Members	
	Residential areas on the construction area	
	■ Parents of Principal of Yarbay Refik Cesur Elementary School students	
Media	National and local media	These stakeholders may provide concerns and remarks on the project.
<b>Employees</b>		
Project Employees	Construction Employees	Employees may provide concerns and remarks during the lifecycle of the project
	Operation Employees	
Patients and family members		Patients may provide concerns and remarks during the operation phase project