

PETROLEUM PIPELINE CORPORATION

STORAGE DEPARTMENT



GAS STORAGE EXPANSION PROJECT

ACTION PLAN TO PREVENT

GENDER-BASED VIOLENCE

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ABBREVIATIONS

BOTAŞ – Petroleum Pipeline Corporation

CoC – Code of Conduct

ESIA – Environmental and Social Impact Assessment

GBV – Gender Based Violence

GPN – Good Practice Note

GRM – Grievance Redress Mechanism

GSEP – Gas Storage Expansion Project

IPV – Intimate Partner Violence

RAP – Resettlement Action Plan

SEA – Sexual Exploitation and Abuse

SH – Sexual Harassment

SPD – Standard Procurement Document

WB – World Bank

1. INTRODUCTION

Gender Based Violence (GBV) is described as “an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially attributed gender differences”¹. GBV includes;

- behaviour that causes physical, mental, sexual harm or suffering;
- threats of such acts;
- coercion and other deprivations of liberty,

whether occurring in public or in private life.

Particularly women and girls are affected from GBV across their lifespan. GBV takes many forms, including sexual, physical, and psychological abuse. It may occur at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises.

In order to designate an act of violence as an act of GBV, it should be considered whether the act reflects and/or reinforces unequal power relations between males and females.

Turkish laws and legislation considers all forms of GBV as criminal acts.

The migration and temporary settlement of laborers in the project brings along GBV risks. The risk of gender-based violence is one of the most critical adverse social impacts that the Project needs to consider thoroughly. Since the main GBV risks associated with the Project are Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), this document focuses on SEA and SH.

Sexual Exploitation and Abuse (SEA)

Sexual Exploitation and Abuse (SEA) is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

Sexual Harassment (SH)

Sexual Harassment (SH) is defined as unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

SEA occurs against a beneficiary or member of the community. On the other hand, SH occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Consent

Consent is a key consideration in SEA and SH. Consent is the choice behind a person’s voluntary decision to do something. Consent for any sexual activity must be freely given,

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation;
- the use of a threat to withhold a benefit to which the person is already entitled, or;
- a promise is made to the person to provide a benefit

¹ Good Practice Note, Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, World Bank, 28.09.2018

1.1. Objectives and Scope

The objective of this Action Plan is to address management of SEA/SH risks in the Gas Storage Expansion Project (GSEP), by specifying GBV risk of the project, mitigation measures against GBV risks, stakeholders, mapping of possible service providers and responding mechanism for SEA/SH incidents. Responding mechanism of SEA/SH incidents will be described in the separate sections of this Action Plan. Although this Action Plan focuses on SEA/SH against women and girls, it also includes the one against boys and men.

While implementing this Action Plan, key principles reflected in the 2017 GBV Task Force Report² will be considered:

- *Be survivor-centered:* Approach considerations related to GBV prevention, mitigation and response through a survivor-centered lens, protecting the confidentiality of survivors, recognizing them as principle decision-makers in their own care and treating them with agency, dignity and respect for their needs and wishes.
- *Emphasize prevention:* Adopt risk-based approaches that aim to identify key risks of GBV and to undertake measures to prevent or minimize harm.
- *Build on existing local knowledge:* Engage community partners -local leaders, civil society organizations, gender and child advocates- as resources for knowledge on local level risks, effective protective factors and mechanisms for support throughout the project cycle.
- *Be evidenced-based:* Build on existing global research and knowledge on how to address GBV effectively.
- *Be adaptable:* Operational guidance presented in this note provides the foundation for an effective GBV risk management approach; adapt and adjust mitigation measures to respond to the unique drivers and context in any given setting.
- *Enable continuous monitoring and learning:* Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate and respond to GBV.

These are only fundamental principles that are considered while preparing this Action Plan. Details will be given in the further sections. This Action Plan is a framework document. The Construction Contractor will prepare its own GBV Prevention Action Plan in accordance with this plan. BOTAŞ will review and approve the Contractor's Action Plan. Contractor's GBV Action Plan will also include procedures, which will describe how the Contractor will ensure that the sub-contractors are aware of obligations from the GBV Action Plan and how the sub-contractors will comply with the commitments and actions proposed in the plan. Implementation of this document is the responsibility of BOTAŞ's social team.

1.2. Brief Project Description

Gas Storage Expansion Project (GSEP) will increase the storage capacity of Tuz Gölü Underground Gas Storage Facility from 1 billion Nm³ to 6 billion Nm³. The construction works include construction of a new surface facility, 40 (+8 spare) new wells and connection lines between these wells, fresh water pipeline including pump stations and storage tanks, brine pipeline, connection line to the national gas network, ETLs and access roads. GSEP will affect the following settlements: Ankara province; Evren district, Aksaray province; Sarıyahşi, Ağaören, Ortaköy, Eskil, Sultanhanı and Merkez districts and Konya province; Emirgazi district.

² Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects, World Bank, 2017

2. LEGAL FRAMEWORK

The laws in force in Turkey related to GBV issues are listed below with publication dates and numbers;

- Labor Law (Law Number:4857, Publication Date: 22/5/2003)
- Turkish Criminal Law (Law Number:5237, Publication Date: 26/9/2004)
- Law of Protection of Family and Prevention of Violence Against Women (Law Number: 6284, Publication Date: 08/3/2012)

Furthermore, the World Bank has disclosed the following document;

- Standard Procurement Document (SPD), Request for Proposals Consultancy Services (October 2017)

These regulations will be summarized in the following sub-sections.

2.1. Labor Law

The aim of Labor Law is to regulate the rights and responsibilities of the workers employed on the basis of an employment contract, as well as the working conditions and working environment of employers.

Labor law shall be applied to all workplaces, employers and employers' representatives and their employees, regardless of their scope of activity (except for the exceptions in Article 4).

Workplaces, employers, employers' representatives and workers are tied to the provisions of this Law, regardless of the date of notification in Article 3.

Under the Article 24 and 25 of Labor Law “Right of termination of the employee/employer for reasonable causes”, it is stated that in case of an SH in work place, employee/employer may terminate the contract before the expiry of the term or without waiting for the notification period (see Annex 1).

2.2. Turkish Criminal Law

The objective of Turkish Criminal Law is to prevent crimes and to protect the rights and freedoms of individuals; public order and security; public health and the environment and community peace. The law sets out the basic principles of criminal liability and the types of offenses, penalties and security measures in order to achieve this objective.

In Section 6 - Crimes Against Sexual Immunity- GBV related offences and their penalties are defined. In Articles 102, 103, 104 and 105 under Section 6, provisions regarding sexual assault, sexual abuse of children, sexual intercourse with a minor and sexual harassment are explained respectively (See Annex 1).

2.3. Law of Protection of Family and Prevention of Violence against Women

Law No. 6284 on the Protection of Family and Prevention of Violence against Women is the backbone of the Turkey’s response to violence against women. The aim of this Law is to regulate the procedures and principles regarding the protection of women, children, all family members and persons who are victims of persistent pursuit. Regulations on the “Establishment and Operation of Women’s Guest Houses” and “Establishment and Operations of Violence Prevention and Monitoring Centers” are the complementary legislative framework that compromise the overall GBV referral mechanism in Turkey.

Law No. 6284 is based on the Constitution of Turkey and international conventions to which Turkey is a State party, especially the Convention of Council of Europe on Combating Domestic Violence, and other legal regulations in force. The Law depicts violence against women as “any attitude and behavior that is directed against a woman only because she is a woman or that affects women thereby creating a gender-based discrimination and a violation of human rights, and is defined as violation in this Law.” In this regard, survivors and perpetrators of Sexual Harassment and Sexual Exploitation and Abuse, who are the principle

focus of this Action Plan, are also subjects of this Law, in addition to those who are affected by domestic violence.

Some basic features of Law No. 6284 are as follows:

- The Law ensures a swift and efficient response mechanism by giving authority to the local authority to issue injunction and by authorizing the police in case of emergency.
- The Law provides support services for survivors and perpetrators of violence, establishes Violence Prevention and Monitoring Centers (ŞÖNİMs)³ and sets the basics for the provision of temporary financial aid and medical expenses.
- The Law introduces preventive and protective measures for survivors including forced imprisonment in case of violation of preventive measure decision, and provides a mechanism for monitoring the effective implementation of measures through technical tools and methods.
- The Law introduces the Ministry as an active agent in prevention of violence against women and donates the Ministry with a range of responsibilities including right to involve in judicial cases.

The following basic principles shall be complied in the implementation of this Law:

- In the providing of support and services to victims of violence; a fair, effective and swift procedure based on basic human rights, sensitive to equality of men and women, complying with the principle of social state, is followed.
- Measures taken for the victims of violence and for the perpetrator of violence are fulfilled in a way that is appropriate to human dignity.
- Special measures that prevent gender-based violence against women and protect women from gender-based violence cannot be interpreted as discrimination under this Law.

As per the Article 7 (1) of this Law, public officials receiving a notification of a GBV incident or a risk of GBV incident are obliged to inform relevant competent authority.

2.4. Standard Procurement Document, Request for Proposals Consultancy Services

This Standard Procurement Document has been prepared by the World Bank in order to describe selection procedures & requirements and conditions of contract for the projects financed by World Bank. In the last revision dated October, 2017; environmental, social, health and safety (ESHS) aspects have also been enhanced to include additional provisions on sexual exploitation and SEA and GBV. These provisions are given in Annex 2.

3. ASSESSMENT AND MANAGEMENT OF GBV RISKS

3.1. SEA/SH Risks of the Project

The Project will potentially involve an influx of workers to the project location. During the construction phase of GSEP which is expected to last approximately 5 years, starting from 2019, a total of 500 people are planned to be employed, with approximately 400 workers, 30 managers, 50 experts / engineers and 20 office workers.

The migration to and temporary settlement of laborers in the project, carries an array of potentially positive and negative impacts in terms of demands on public infrastructure, utilities, housing and sustainable

³ Violence Prevention and Monitoring Centers (ŞÖNİMs) are the backbone of the GBV referral mechanism in Turkey as they are the primary agents to monitor cases of violence against women, coordinate amongst different service providers and refer survivors to women's shelters (referred as women's guest houses within the national legislation).

resource management and the strain on social dynamics. The risk of SEA/SH is one of the most critical adverse social impacts of the Project.

For the construction of Surface Facility and storage caverns, a temporary campsite will be constructed on the expropriated area, which is located in Aksaray Province, Sultanhanı district. Thus, the most affected settlement will be Sultanhanı district.

On the other hand, for the construction of other components of the Project such as natural gas pipeline, brine and fresh water lines, energy transmission line; campsites may be constructed or other easily accessible accommodation places may be provided for staff instead of campsites. Therefore, Aksaray province Sarıyahşi, Ağaören, Ortaköy, Eskil and Merkez districts, Konya province Emirgazi district and Ankara province Evren district will be affected by the Project.

3.2. Mitigation Measures

In order to minimize the SEA/SH related risks, following mitigation measures will be taken within the scope of GSEP;

- Sensitization of the Managements of Construction Contractor and both Consultants on SEA and SH issues will be provided.
- Awareness Meetings will be conducted with the affected communities.
- Trainings regarding SEA/SH will be provided to all Project workers.
- All Project workers will sign and be informed about the Code of Conduct.
- A functional GRM and referral mechanism will be operated in order to capture SEA/SH related complaints.
- Separate facilities for men and women in the workers' camps will be provided.

3.2.1. Sensitization of the Managements of Construction Contractor, Consultants and BOTAS' Human Resources Department

In the context of GSEP, a general sensitization meetings on environmental and social aspects of the Project will be carried out with the management of the Construction Contractor, Supervision Consultant, ESIA & RAP Monitoring Consultant and BOTAS' Human Resources Department. In these meetings, participants will be informed by BOTAS's social team on the prohibition of SEA/SH, project Code of Conduct and other SEA/SH related issues, in accordance with the training, which will be previously provided to BOTAS by an organization with experience in GBV prevention.

3.2.2. Awareness Meetings with PAPs

Community meetings that would focus solely on SEA/SH would diminish women and girls' perception of personal safety and more importantly may make them suffer further restrictions by their male family members. For this reason, SEA/SH will be only one of the topics of women-only stakeholder meetings on general environmental and social issues of the Project. Participants will be informed about the Code of Conduct, available GRM, available services/referral mechanism and related national legislations.

These general environmental and social meetings will be held at least once a year for all affected settlements given in Table 1. The number of meetings will be at least seven and they will be organized in such way that all PAP's would be able to participate in these general environmental and social meetings. Announcements will be made prior to these meetings in order to increase participation.

Table 1. Project Affected Settlements, Districts and Provinces

No	Affected Settlements			Project Component
	Province	District	Village/Quarter	
1	Ankara	Evren	Center	Pump station and freshwater line
2	Aksaray	Sarıyahşi	Center	Freshwater line
3	Aksaray	Sarıyahşi	Boğazköy	Pump station and Freshwater line
4	Aksaray	Ağaçören	Kütüklü	Freshwater line
5	Aksaray	Ağaçören	Center	Pump station and Freshwater line
6	Aksaray	Ağaçören	Camili	Pump station and Freshwater line
7	Aksaray	Ağaçören	Kederli	Freshwater line
8	Aksaray	Ağaçören	Abdiuşağı	Freshwater line
9	Aksaray	Ağaçören	Çatalçeşme	Freshwater line
10	Aksaray	Ortaköy	Hacımahmutuşağı	Freshwater line
11	Aksaray	Ortaköy	Hacıibrahimuşağı	Freshwater line
12	Aksaray	Ortaköy	Hıdırlı-Fakıcık	Freshwater line
13	Aksaray	Ortaköy	Pınarbaşı	Freshwater line
14	Aksaray	Ortaköy	İshaklı Karapınar	Freshwater line
15	Aksaray	Ortaköy	Camuzluk	Freshwater line
16	Aksaray	Merkez	Bostanlılık	Freshwater line
17	Aksaray	Merkez	Cerit	Freshwater line
18	Aksaray	Merkez	Altınkaya	Freshwater line
19	Aksaray	Merkez	Hanobası	Freshwater line
20	Aksaray	Merkez	Sapmaz	Freshwater line
21	Aksaray	Merkez	Baymış	Freshwater line
22	Aksaray	Merkez	Yeşiltepe	Freshwater line
23	Aksaray	Merkez	Yeşilova	Freshwater line
24	Aksaray	Merkez	Yenikent	Freshwater line
25	Aksaray	Eskil	Center	Brine discharge line
26	Aksaray	Sultanhanı	Center	Freshwater line, brine discharge line, natural gas line, well areas and surface
27	Aksaray	Eskil	Güneşli	Well areas
28	Konya	Emirgazi	Besci	Well areas

3.2.3. Trainings

The key staff of BOTAS, Construction Contractor, Supervision Consultant, and ESIA and RAP monitoring Consultant will be provided a rather comprehensive training on SEA/SH by an institution having experience on SEA/SH. There will be refreshment trainings for the key BOTAS / Construction Contractor /Consultants staff on annual basis.

These key trained staff will then provide these trainings to all Project workers on certain intervals not exceeding 6 months.

These trainings may be incorporated into the regular Occupational Health and Safety (OHS) ‘toolbox’ meetings with workers, official training and/or standalone trainings may be provided.

In addition, on-the-job training program provided for newly-hired employees as a part of their recruitment process will include an informative session on SEA/SH and the Code of Conduct.

Training will include the following issues but not limited to:

- Definition of SEA/SH
- Prohibited behaviors related to SEA/SH and the sanctions for violations
- Roles and responsibilities of actors involved in the Project (see Table 1)
- SEA/SH incident reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff
- Legislations concerning SEA/SH
- Services provided for SEA/SH survivors

3.2.4. Code of Conduct

The Code of Conduct will be prepared consistent with the World Bank’s 2017 SPDs and SBDs for international Competitive Bidding of Works. It will include not only the rules workers must obey within the campsite but also the interaction and communication with local residents in the region outside the campsite. All employees of BOTAS, contractors (including sub-contractors), ESIA and RAP Monitoring consultant and Supervision consultant with a footprint on the ground in the project area will sign the Code of Conduct at the moment of the signing the employment contract.

CoC is an instrument to assist in mitigating risks related to SEA and SH. The CoC clearly defines obligations of all project staff (including sub-contractors and day workers) regarding:

- Policies related to SEA and SH
- Compliance with applicable labor legislation
- Norms and regulations of conduct for all personnel
- An understanding that GBV is prohibited and that the violation of the CoC will be addressed with disciplinary measures of various degree.

Proposed CoC is included in Annex 2.

PAP’s will be informed about CoC by means of awareness meetings mentioned in Section 3.2.2., while awareness raising of all Project workers on CoC will be provided by regular trainings described in Section 3.2.3. Furthermore, CoC standards will be posted in public spaces at the contractor’s work camps and living areas in local languages.

3.2.5. Grievance Redress Mechanism

BOTAS has established a Grievance Redress Mechanism open to the use of all stakeholders, directly or indirectly affected by the project, including Project workers. In GSEP Project, GRM for SEA/SH cases is

a part of overall GRM operated by BOTAŞ. For SEA/SH, the GRM should primarily serve to: (i) refer complainants to the GBV Services Provider; and (ii) record resolution of the complaint.

Specific GRM considerations for addressing SEA/SH are as follows:

- SEA/SH complaints are collected confidentially and empathetically (with no judgement). The information in the GRM is kept confidential. GRM operator, who is responsible for taking and recording of complaints, will receive a training on this action plan and particularly on the confidentiality of the cases. GRM database is protected by a password and can only be accessed by the authorized staff.
- GRM has multiple complaint channels, such as submission in person, by phone, text message, mail or e-mail. During public consultation meetings performed in the early phases of the Project, brochures explaining how to transmit the grievances were handed out to PAPs. More brochures will be distributed to PAPs during the further awareness meetings mentioned in Section 3.2.2.
- BOTAŞ's GRM will also receive complaints via Contractor's and Consultants' GRM channels.
- GRM database is designed such that only generic information (with consent of the survivor) such as province, gender, age is stored. Identifiable information (name, contact number) will be kept separately as confidential. Only BOTAŞ's social team (SEA/SH focal point) will have access to personal information. BOTAŞ's social team will be trained how to handle confidential personal information.
- The GRM will only record and report information on the following three aspects related to the GBV incident, with the consent of the survivor:
 - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - If, to the best of their knowledge, the perpetrator was associated with the project; and,
 - If possible, the age and sex of the survivor.

3.2.6. Separate Facilities for Men and Women

Safety of women at the project sites is important. A set of measures will be implemented to increase the safety of women. For example, separate toilets, utility rooms and changing rooms for men and women will be provided when there are female staff deployed at the campsites. Regular cleaning and proper lightening of these facilities will be ensured.

4. RESPONDING OF SEA/SH INCIDENTS

Even when the Project implements the mitigation measures, SEA/SH incidents may still occur.

As per Turkish Criminal Law, sexual crimes are punished depending whether a physical contact have been occurred or not. Sexual crimes are defined as follows;

- Sexual Abuse: Unwelcome sexual abuse without any physical contact
- Sexual Assault: Unwanted sexual behavior with any physical contact

The responding pathway of an SEA/SH incident depends on whether it is an abuse or an assault. The reason for this is that a public official must notify the competent authority as per the Law 6284, if he/she has the knowledge that a sexual assault has occurred. In this framework, in the case that a grievance of a sexual assault is received, the grievance is referred to the competent authority (ŞÖNİM) regardless of the survivor's consent, since BOTAŞ is a Governmental Institution. On the other hand, for sexual abuse grievances, survivor's consent will be requested for further proceeding of the case. In the awareness meetings with PAP's, the referral mechanism both for sexual assault and for sexual abuse cases will be explained clearly. The responding mechanism for SEA/SH incidents is given in Figure 1.

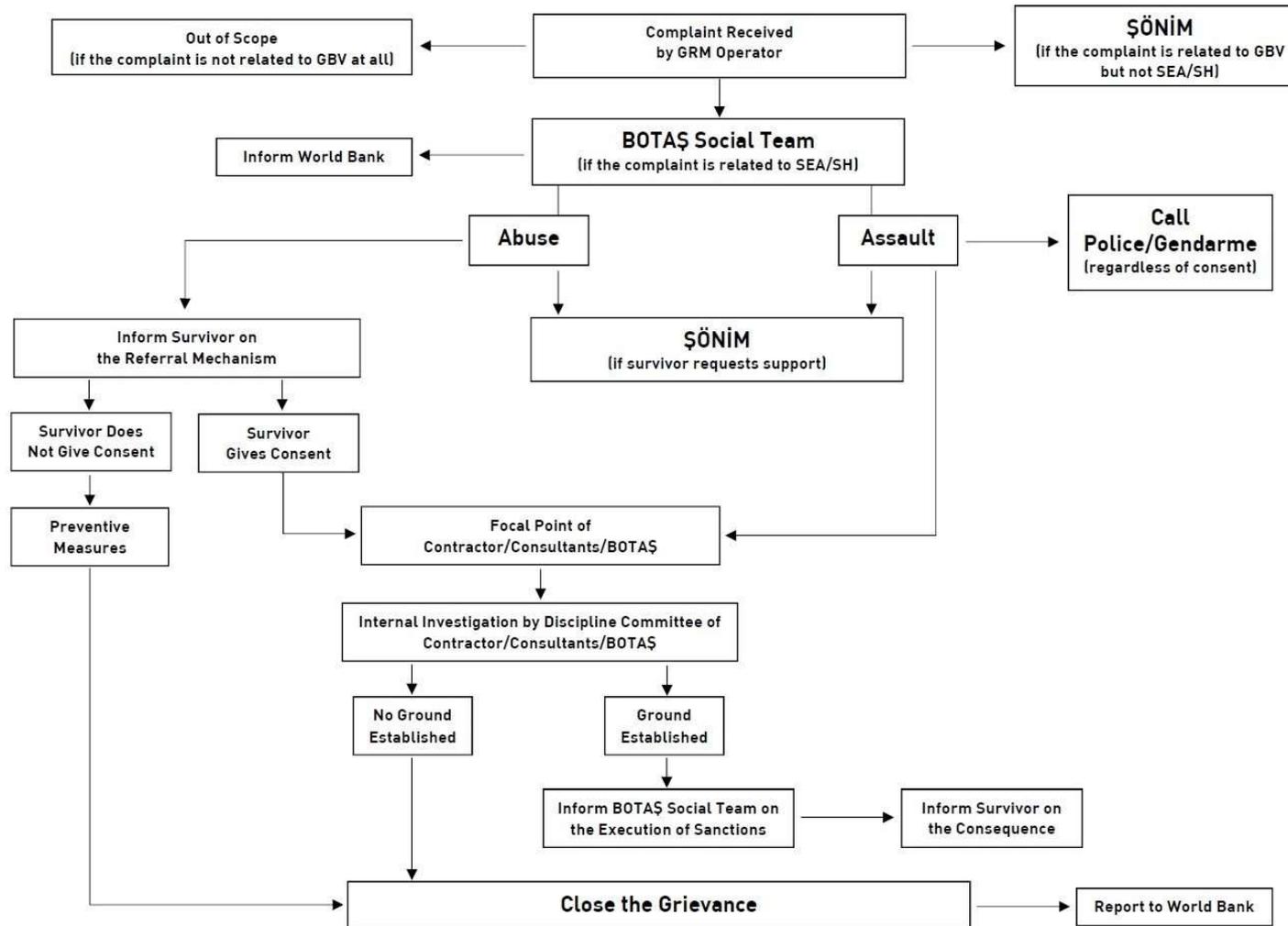


Figure 1. GSEP Responding Mechanism for SEA/SH Incidents

As a first step, complaints related to GBV incidents are received by GRM operator. There are two GRM operators, one in headquarters and the other one at site. Grievances can be submitted directly to BOTAŞ in person, by phone, text message, mail or e-mail, or via Contractor's and consultants' GRM channels. Construction Contractor and Consultants shall inform BOTAŞ in case of any incident captured by their own GRM. There shall be female staff at site taking face-to-face grievances related to SH/SEA incidents.

Grievances related to GBV but not SEA/SH (e.g. Domestic violence) shall be transmitted to ŞÖNİM directly. For grievances related to SEA/SH, BOTAŞ's social team will determine by whether it is an abuse or an assault. The World Bank will be informed concurrently.

The cases determined to be an assault will be referred to Police/Gendarme regardless of the survivor's consent, as per the Law 6284. Such cases will be also referred to related focal point (Contractor/Consultants/BOTAŞ) concurrently. The survivor will be accompanied in Police Department/Gendarme Command by a female employee appointed by BOTAŞ who has knowledge of the legal procedure. Furthermore, the survivor shall be informed about the referral mechanism, the services available to survivors including medical and psychosocial support. If the survivor requests support, she will be directed to ŞÖNİM accompanied by BOTAŞ.

In instances when the survivor is referred to ŞÖNİM, the survivor will fill out and sign the consent form (see Annex 5). For the survivors below the age of 18, parents/guardian will fill out and sign the form.

In case of an abuse, survivor will be informed on the referral mechanism and the services available. The survivor can choose to take up the referral or not. If the survivor requests referral, she will be directed to ŞÖNİM accompanied by BOTAŞ.

If the survivor is between the age of 15-18, consent form should be signed by the parents/guardian of the child. If the child does not want her parents/guardian to know about the incident, consent can not be provided. In such circumstances, the case shall be closed after BOTAS/Contractor implements preventive measures such as additional trainings for workers and refreshment trainings on CoC. If the survivor is a child below the age of 15, the case will referred to Police/Gendarme as per the national legislations.

Furthermore, in case of an abuse, the survivor will be asked for her consent for an internal investigation of alleged perpetrator. If survivor does not give consent, preventive measures such as additional trainings and refreshment training on CoC will be carried out and the case will be closed. If she gives consent, a consent form (see Annex 6) is filled out by the survivor and Focal Point of the related party will be informed on the case.

Afterwards, Internal Investigation Focal Point commences internal investigation. Internal investigation will be conducted by the discipline committee of the related party (Contractor/Consultant/BOTAŞ) as per their own internal regulations.

BOTAŞ's Internal Investigation

BOTAŞ conducts internal investigations related to inappropriate behaviors of its own employees in accordance with internal legislation called "Disciplinary Code for Personnel". This Code complies with the national legislation of Turkey. As per this legislation, in case of an inappropriate behavior of an employee, the incident is transmitted to the "discipline committee" composed of managers for human resources, manager of alleged perpetrator, and another manager appointed by the district/operating manager. At least, one of the committee members is female. This committee, which will be sensitized previously on SH/SEA issues, will investigate the incident by hearing the witnesses, seeing evidences and hearing defense of the alleged perpetrator and will conclude a relevant disciplinary sanction to the perpetrators such as;

- Warning penalty (to notify the employee that he should be more attentive)
- Censure penalty (to notify the employee that he is faulty and should be more attentive)

- Loss of up to two day's salary
- Suspension of proceeding of seniority, for 1 year up to 3 years
- Termination of employment

Construction Contractor's and Consultants' Internal Investigation:

Construction Contractor and Consultants manage their disciplinary issues as per their "Disciplinary Procedure". In this document, inappropriate behaviors which require disciplinary actions and corresponding sanctions are mentioned. Sanctions are classified according to the number of repetitions of the violations.

Inappropriate behaviors regarding SEA/SH are specified as follows;

- Assaulting or abusing an employee on the job site (including sexual abuse and assault)
- Harassment at work (including sexual harassment)
- Sexual abuse, assault or harassment to the local community

In case of any of these behaviors, the incident is transmitted to the "Discipline Committee" composed of related managers, manager of alleged perpetrator and another staff appointed by the Project Manager. At least one of the committee members is female. This committee, which is sensitized previously, investigates the incident by hearing the witnesses, seeing evidences and taking defense of the alleged perpetrator and conclude a relevant disciplinary sanction to the perpetrators such as;

- Verbal warning
- Written warning
- Dismissal (termination of the employment)

These sanctions are only valid for the first violation. If the behavior has been repetitive, the employee will be dismissed directly. If no ground is established for the grievance according to the result of the internal investigation, the grievance will be closed.

After the completion of internal investigation, Construction Contractor and Consultants will inform BOTAŞ's social team about the result of internal investigation. Provided that the actions are confirmed in accordance with this plan, complaint will be closed and the case will be reported to the World Bank. The survivor will also be informed on the result of the internal investigation.

The grievance will be responded and finalized within 40 business days after taking the grievance.

5. STAKEHOLDERS

5.1. Service Providers

In order to manage GBV incidences effectively, it is crucial to work with GBV Service Providers and organizations that are capable of supporting the project during its implementation.

There are range of service providers for survivors that may be needed in case of an incident, including case management support, health services, psychosocial support, shelter if needed, security and police support, and access to legal services around the project region. Therefore, BOTAŞ identified the institutions and organizations, which are dealing with GBV prevention and response at the project region stated below.

- Security Forces (Police and Gendarmerie)
- Provincial Directorate of Family Labor and Social Services
- Provincial Directorate of Ministry of Health
- Justice Services (Courts)

BOTAŞ will ensure that the survivor is able to acquire any services. BOTAŞ mapped out (see Annex 4) GBV prevention and response actors in project adjoining communities, incorporating the capabilities of the service providers to provide quality survivor-centered services including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by BOTAŞ and Construction Contractor/Consultant itself. In particular, meetings have been organized with Ministry of Family Labor and Social Services in order to receive information about the services provided and for close cooperation. In fact, accessing services provided by those entities is the choice of the Survivor in line with the survivor-centered approach, even in the case when survivor chooses to pursue charges through the local justice system.

5.1.1. Security Forces (Police and Gendarme)

There are security forces at project site and depending on the location of case the survivor can report to police or gendarme; in addition, both have emergency call lines, which are “ALO 155” for police and “ALO 156” for gendarme, made available to the public.

5.1.2. Provincial Directorate of Family Labor and Social Services

The Ministry of Family Labor and Social Services is taking a leading role in strengthening national policy, advocacy, and civil society engagement and understanding, and addressing the gender-based violence through the legislation and action plans at national level. Several organizations (seminars, workshops, etc.) have been launched to sensitize attitudes and improve knowledge and practices related to GBV at national as well as local level.

Moreover, Violence Prevention and Monitoring Centers (ŞÖNİMs) are the backbone of the GBV referral mechanism in Turkey as they are the primary agents to monitor cases of violence against women, coordinate amongst different service providers and refer survivors to women’s shelters (referred as women’s guest houses within the national legislation). For this reason, ŞÖNİM is the main service provider to which BOTAŞ will refer the cases. Since ŞÖNİM only serves survivors over the age of 18, if the survivor is below the age of 18, ŞÖNİM will automatically contact with the related department of Provincial Directorate of Family, Labor and Social Services.

In this context, Provincial Directorate at the city of Aksaray is the representative of the Ministry at local level that is tasked with ensuring swift, efficient and effective response is provided for GBV related incidents at survivor’s own consent. Emergency call line is also available as “ALO 183”.

5.1.3. Provincial Directorate of Ministry of Health

Provincial Directorate of Health provides all types of medical assistance for the survivor of violence through the hospitals and health centers accompanying with counselling support to the victim’s family. Health workers at the local level are available and are the main point of contact for survivors to approach the health department. Emergency call line is also available as “ALO 112”.

5.1.4. Justice Services (Courts)

The region has Courts in order to settle GBV incidents in case that the survivor would like to pursue charges through the local justice system.

5.2. Stakeholder Engagement

BOTAŞ aims at implementing appropriate policies, codes of conduct and trainings to address and prevent gender-based violence in the workplace and host community from occurring; and monitor progress.

In this context, stakeholder engagement is one of key approaches to manage GBV related risks and issues. It is crucial to be in continuous consultation with local communities throughout the project life. For this purpose, within the scope of stakeholder engagement plan, community meetings will be organized with

particular focus on women, to disseminate and share information about the issues that may arise with regard to GBV, annually.

Furthermore, Grievance Redress Mechanism, which is one of the elements of stakeholder engagement, should be easily accessible, understandable. The local communities shall be informed where to submit any complaints related to GBV. This local grievance system will be established within the body of BOTAŞ, implemented and followed by both BOTAŞ and the Construction Contractor during the construction, operation and decommissioning phases.

Moreover, BOTAŞ shall ensure that there is an availability of learning opportunity to expand the Contractor’s, Consultants’ as well as BOTAŞ’s own understanding and capacity of effective approaches to prevent or respond to GBV. “Training of Trainers” approach will be implemented through the project lifetime in which BOTAŞ’s representatives shall be trained with the cooperation of UNFPA and the knowledge gained shall be shared with Contractor’s and Consultants’ staff involved in the project.

6. ROLES AND RESPONSIBILITIES

Roles and Responsibilities of all parties concerning SEA/SH Management of GSEP are given in Table 2. below:

Table 2. Roles and Responsibilities Related to SEA/SH

Management Level	Role & Responsibility
BOTAŞ	<ul style="list-style-type: none"> • Map out SEA/SH prevention and response actors • Perform stakeholder consultations • Take the GRM complaints • Refer the case to Service Provider • Inform World Bank about GRM complaints • Inform Focal Point of the related party • Ensure that internal investigation is performed by related party • Ensure that sanction is imposed • Ensure that information about service providers is available to survivors • Perform internal investigation where GBV incident is related to its own employees
Contractor	<ul style="list-style-type: none"> • Prepare CoC including SEA/SH issues in English, Turkish and Chinese • Provide CoC to all workers to be signed while signing the employment contract • Provide trainings to the workers regarding Code of Conduct and prohibition of SEA/SH • Inform BOTAŞ in case of any SEA/SH related incident • Perform internal investigation where SEA/SH incident is related to its own employees • Impose sanctions to the perpetrators. • Inform BOTAŞ about the result of internal investigation

Management Level	Role & Responsibility
Consultants	<ul style="list-style-type: none"> • Provide CoC to all workers to be signed while signing the employment contract • Inform BOTAŞ in case of any SEA/SH related incident • Perform internal investigation, where SEA/SH incident is related to its own employees • Impose sanctions to the perpetrators • Inform BOTAŞ about the result of internal investigation
Police or Gendarme	<ul style="list-style-type: none"> • Provide support for legal investigation
Provincial Directorate of Family, Labor and Social Services	<ul style="list-style-type: none"> • Provide support on SEA/SH trainings • Provide legal and psycho-social support services to SEA/SH survivors
Provincial Directorate of Health	<ul style="list-style-type: none"> • Provide health and psychological support services to SEA/SH survivors

7. MONITORING AND REPORTING

In order to assess the effectiveness of the mitigation measures, SEA/SH activities will be monitored regularly considering indicators related to: (i) the SEA/SH activities on the project; and, (ii) the GRM.

SEA/SH indicators include but not limited to:

- Community engagement meetings (at least 7 meetings per year)
- Interval of trainings on SEA/SH and CoC delivered (at least 2 trainings per year)
- Percentage of workers that have signed a CoC is 100%
- Percentage of workers that have attended the CoC training is 100%
- Percentage of workers that receive on-the-job training is 100%

Monitoring will also include information on:

- Number of SEA/SH incidents captured
- Number of SEA/SH grievances that have been referred to GBV Services Providers
- Time taken to resolve the SEA/SH-related complaint

BOTAŞ's social team will monitor and report on the effectiveness of the implementation of this action plan to prevent and mitigate SEA/SH risks associated with the project, by considering SEA/SH indicators mentioned above.

The monitoring results will be presented to WB in the quarterly monitoring reports prepared in scope of the "Consultancy Services for ESIA and RAP Monitoring of GSEP".

Table 3. shows the reporting mechanisms for GBV monitoring. Reporting will not have any identifiable information on individual cases. Confidentiality and safety of survivors is protected.

Table 3. Reporting of SEA/SH During Implementation

Who	To whom	What	When
GRM Operator of BOTAS	BOTAS's social team and WB (concurrently)	Reporting of SEA/SH incidents with three key data (with the consent of the survivor): <ul style="list-style-type: none"> • Nature of the case • Project related • Age and/or sex (if available) 	As soon as becomes known
BOTAS's social team	WB	<ul style="list-style-type: none"> • Status on the implementation of this Action Plan • Agreed Project SEA/SH indicators • Whether GRM is working accurately for taking and resolving complaints • GRM indicators • Whether Resolving Mechanism is established and working well • Percentage of workers who signed the Code of Conduct • Number of grievances received in the reporting period and cumulative • Number (percentage) of closed grievances within the stipulate timeframe • Number (percentage) of open grievances • Percentage of workers who received the GBV training • Number of awareness sessions held for local communities (in the reporting period and cumulative) 	Quarterly

Annex 1. Turkish Regulations Related to SEA/SH

A. Labor Law (Law Number: 4857, Publication Date: 22/05/2003)

Employee's Right to Break the Contract for Just Cause

Article 24 - The employee is entitled to break the contract, whether for a definite or an indefinite period, before its expiry or without having to observe the specified notice periods, in the following cases.

II. For immoral, dishonourable or malicious conduct or other similar behaviour

b) If the employer is guilty of any speech or action constituting an offence against the honour or reputation of the employee or a member of the employee's family, or if he harasses the employee sexually;

d) If, in cases where the employee was sexually harassed by another employee or by third persons in the establishment, adequate measures were not taken although the employer was informed of such conduct

The Breaking Down of the Employment Contract by the Initiative of the Employer

Article 25 - The employer may break the contract, whether for a definite or indefinite period, before its expiry or without having to comply with the prescribed notice periods, in the following cases:

II. For immoral, dishonourable or malicious conduct or other similar behaviour

c) If the employee sexually harasses another employee of the employer;

B. Turkish Criminal Law (Law Number: 5237, Publication Date: 26/09/2004)

Sixth Section

Offenses against sexual immunity sexual abuse

Article 102 - (1) Any person who attempts to violate sexual immunity of a person, is sentenced to imprisonment from two years to seven years upon complaint of the victim.

(2) In case of commission of offense by inserting an organ or instrument into a body, the offender is punished with imprisonment from seven years to twelve years. In case of commission of this offense against a spouse, commencement of investigation or prosecution is bound to complaint of the victim.

(3) If the offense is committed; a) Against a person who cannot protect himself because of corporal or spiritual disability, b) By undue influence based on public office, c) Against a person with whom he has third degree blood relation or kinship, d) By using arms or participation of more than one person in the offense, the punishments imposed according to above subsections are increased by one half.

(4) In case of use of force during the commission of offense in such a way to break down victim's resistance, the offender is additionally punished for felonious injury.

(5) In case of deterioration of corporal and spiritual health of the victim as a result of the offense, the offender is sentenced to imprisonment not less than ten years.

(6) In case of death of vegetal existence of a person as result of the offense, the offender is sentenced to heavy life imprisonment.

Child molestation

Article 103 - (1) Any person who abuses a child sexually is sentenced to imprisonment from three years to eight years. Sexual molestation covers the following acts; a) All kinds of sexual attempt against children

who are under the age of fifteen or against those attained the age of fifteen but lack of ability to understand the legal consequences of such act, b) Abuse of other children sexually by force, threat or fraud.

(2) In case of performance of sexual abuse by inserting an organ or instrument into a body, the offender is sentenced to imprisonment from eight years to fifteen years.

(3) In case of performance of sexual abuse by antecedents, second or third degree blood relations, step father, guardian, educator, trainer, nurse and other persons rendering health services and responsible from protection and observation of the child, or by undue influence based on public office, the punishment to be imposed according to the above subsections is increased by one half.

(4) In case of execution of sexual abuse against the children listed in paragraph (a) of first subsection by use of force or threat, the punishment to be imposed is increased by one half.

(5) The provisions relating to felonious injury are additionally applied in case the acts of force and violence cause severe injury to the person subject to sexual abuse.

(6) In case of deterioration of corporal and spiritual health of the victim as a result of offense, the offender is sentenced to imprisonment not less than fifteen years.

(7) In case the offense results with death or vegetal existence of the victim, the offender is punished with heavy life imprisonment.

Sexual intercourse between/with persons not attained the lawful age

Article 104 - (1) Any person who is in sexual intercourse with a child who completed the age of fifteen without using force, threat and fraud, is sentenced to imprisonment from six months to two years upon filing of a complaint.

(2) If the offender is older than the victim more than five years, the punishment to be imposed is doubled without seeking raise of a complaint.

Sexual harassment

Article 105 - (1) If a person is subject to sexual harassment by another person, the person performing such act is sentenced to punishment from three years to two years upon complaint of the victim.

(2) In case of commission of these offenses by undue influence based on hierarchy or public office or by using the advantage of working in the same place with the victim, the punishment to be imposed according to the above subsection is increased by one half. If the victim is obliged to leave the business place for this reason, the punishment to be imposed may not be less than one year.

C. Law of Protection of Family and Prevention of Violence Against Women (Law Number: 6284, Publication Date: 08/03/2012)

Notice

Article 7 - (1) In case of any violence or any risk of violence, everyone may report this to competent authorities. Public officials receiving the notification are obliged to perform their duties under this Law without delay and to inform the competent authorities regarding the measures to be implemented.

Annex 2. GBV/SEA Related Provisions of World Bank's SPD

Request for Proposals Consultancy Services

...

FORM TECH-4, Description of Approach, Methodology, and Work Plan in Responding to the Terms of Reference

a) Technical Approach and Methodology. {Please explain your understanding of the objectives of the assignment as outlined in the Terms of Reference (TORs), the technical approach, and the methodology you would adopt for implementing the tasks [*Note to Client: add the following for supervision of civil works contracts: including the Environmental, Social (including sexual exploitation and abuse (SEA) and gender based violence (GBV)), Health and Safety (ESHS) aspects*] to deliver the expected output(s), and the degree of detail of such output.

...

Section 7. Terms of Reference, Section 7. Terms of Reference, Sample outline:

3. Scope of Services, Tasks (Components) and Expected Deliverables

Ensure that the Contractor's ESHS performance is in accordance with good international industry practice and delivers the Contractor's ESHS obligations.

The ESHS related services include but are not limited to:

- (2) review and approve ESHS provisions of method statements, implementation plans, GBV/SEA prevention and response action plan, drawings, proposals, schedules and all relevant Contractor's documents;*
 - (4) undertake audits, supervisions and/or inspections of any sites where the Contractor is undertaking activities related to the Works, to verify the Contractor's compliance with ESHS requirements including its GBV/SEA obligations, with and without contractor and/or client relevant representatives, as necessary, but not less than once per month*
 - (11) establish and maintain a grievance redress mechanism including types of grievances to be recorded and how to protect confidentiality e.g of those reporting allegations of GBV/SEA.*
 - (12) ensure any GBV/SEA instances and complaints that come to the attention of the consultant are registered in the grievance redress mechanism*
- 8. Team Composition & Qualification Requirements for the Key Experts (and any other requirements which will be used for evaluating the Key Experts under Data Sheet 21.1 of the ITC)**
[Note to Client: For supervision of civil works contracts, Key Expert/s with sufficient qualifications and experience to provide Environment, Social (including sexual exploitation and abuse (SEA) and gender based violence (GBV)), Health and Safety [ESHS] oversight shall be required. The Key Expert/s academic and professional qualifications and experience to recognize and to deliver good international industry practice with respect to Environment, Social (including sexual exploitation and abuse (SEA) and gender based violence (GBV)), Health and Safety (ESHS) should be specified here. The same expert positions should be included for evaluation in ITC 21.1].
- 9. Reporting Requirements and Time Schedule for Deliverables**
- 10. If the Services consist of or include the supervision of civil works, include the following on ESHS reporting:**
- (e) "The Consultant shall provide immediate notification to the Client should any incident in the following categories occur while carrying out the Services. Full details of such incidents shall be provided to the Client within the timeframe agreed with the Client.*

(iv) any allegation of GBV, SEA, sexual harassment or sexual misbehavior, rape, sexual assault, child abuse or defilement, or other violations involving children,

11. Environmental and Social Policy

Suggested content for an Environmental and Social Policy includes following statements:

The Works' policy goal, as a minimum, should be stated to integrate environmental protection, occupational and community health and safety, gender, equality, child protection, vulnerable people (including those with disabilities), sexual harassment, gender-based violence (GBV), sexual exploitation and abuse (SEA), HIV/AIDS awareness and prevention and wide stakeholder engagement in the planning processes, programs, and activities of the parties involved in the execution of the Works. The Client is advised to consult with the World Bank to agree the issues to be included which may also address: climate adaptation, land acquisition and resettlement, indigenous people, etc. The policy should set the frame for monitoring, continuously improving processes and activities and for reporting on the compliance with the policy.

The policy shall include a statement that, for the purpose of the policy and/or code of conduct, the term "child" / "children" means any person(s) under the age of 18 years.

The policy should, as far as possible, be brief but specific and explicit, and measurable, to enable reporting of compliance with the policy and reporting requirement.

As a minimum, the policy is set out to the commitments to:

5. be intolerant of, and enforce disciplinary measures for illegal activities. To be intolerant of, and enforce disciplinary measures for GBV, inhumane treatment, sexual activity with children, and sexual harassment;

12. Code of Conduct

A minimum requirement for the Code of Conduct should be set out by the Client, taking into consideration the issues, impacts, and mitigation measures identified, for example, in:

- *any particular GBV/SEA requirements*

Annex 3. Code of Conduct

Introduction

The company is committed to ensuring a work environment, which minimizes any negative impacts on the local environment, communities, and its workers. The company is also strongly committed to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company. The purpose of this *Code of Conduct* is to:

- Create a common understanding of what constitutes Sexual exploitation and abuse, and sexual harassment
- Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to SEA and SH, and
- Create understanding that breach of this code of conduct will result in disciplinary action.

Definitions

Sexual Exploitation and Abuse (SEA)⁴

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

- Sexual Abuse: “The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

Sexual Harassment:⁵

Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

Sexual Harassment versus SEA⁶

SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Consent is the choice behind a person’s voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. Under this Code of Conduct⁷ consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation

⁴ As defined in the UN Secretary’s bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

⁵ Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community based complaint mechanism. Global standard Operating Procedures.* May 2016

⁶ Ibid

⁷ In accordance with the United Nations Convention on the Rights of the Child.

- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment, which constitute gross misconduct, is grounds for termination or other consequences related to employment and employment status.

Individual signed commitment:

I, _____, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (*employee/contractor*) of (*contracted agency / sub-contracted agency*) in (*country*), I acknowledge that SEA and SH activities on the work site, the work site surroundings, at workers’ camps, or the surrounding community constitute a violation of this *Code of Conduct*. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems, which maintain this environment.
- Not participate in SEA and SH as defined by this *Code of Conduct* and as defined under (*country*) law (*and other local law, where applicable*).
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- Not solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” under this Code.

I commit to:

- Adhere to the provisions of this code of conduct both on and off the project site.
- Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect SEA and SH, at the project site or surrounding community, I understand that I am encouraged to report it to the Grievance Reporting Mechanism (GRM) or to my manager. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

Sanctions: I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action, which could include:

- Informal warning or formal warning

- Additional training.
- Loss of salary.
- Suspension of employment (with or without payment of salary)
- Termination of employment.
- Report to the police or other authorities as warranted.

I understand that it is my responsibility to adhere to this code of conduct. I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach of this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 4. Mapping of Service Providers

Violence Prevention and Monitoring Centers (ŞÖNİMs) are the backbone of the GBV referral mechanism in Turkey as they are the primary agents to monitor cases of violence against women, coordinate amongst different service providers and refer survivors to women's shelters. For this reason, ŞÖNİM is the main service provider to which BOTAŞ will refer the cases. They will automatically contact with the related service provider such as police/gendarme, hospital or courthouse.

Governmental Agencies		
Service Provider	Address	Service
Aksaray Violence Prevention and Monitoring Center (ŞÖNİM)	Kılıçarslan Mahallesi Bediüzzaman Caddesi No: 83 İl Müdürlüğü Binası 3. Kat Merkez/Aksaray Phone: 0382 222 04 34	Counselling
AKSARAY Provincial Security Directorate	Yeni Sanayi Mahallesi E90 Karayolu 68200 Aksaray Merkez/Aksaray Phone: 0382 215 07 14	Security
AKSARAY Police Center	Fatih Mah. 11. Street (Bediüzzaman Street) No:44/1 Phone: 0382 212 33 88	Security
SARIYAHŞI District Police Department	Cumhuriyet Caddesi Sarıyahşi/Aksaray Phone: 0 382 311 25 99	Security
SARIYAHŞI Gendarme District Command	İlçe Jandarma Komutanlığı Sarıyahşi/Aksaray Phone: 0382 311 25 30	Security
AĞAÇÖREN District Police Department	Zafer Mahallesi, 68600 Ağaçören/Aksaray Phone: 0382 331 22 38	Security
AĞAÇÖREN Gendarme District Command	Kale Mahallesi, Şht. Ramazan Ünver Cd. No:20 Ağaçören/Aksaray Phone: 0382 331 30 27	Security
ORTAKÖY District Police Department	Fatih Mahallesi, Şerefli Koçhisar Caddesi Hükümet Konağı Yanı Phone: 0382 351 81 76 - 351 88 36	Security
ORTAKÖY Gendarme District Command	Karaşık Küme Sk. No:1 Aşağı Mahalle Balcı Köyü Ortaköy/ Aksaray Phone: 0382 351 41 26	Security
SULTANHANI District Police Department	Cumhuriyet mah. Recep Tayyip Erdoğan Cd. No:54 Sultanhanı/Aksaray Phone: 0382 242 27 54	Security

Governmental Agencies		
Service Provider	Address	Service
SULTANHANI Gendarme District Command	Zafer Mahallesi Konya Aksaray Yolu 68000 Sultanhanı Belediyesi/Aksaray Phone: 0382 242 20 19	Security
ESKİL District Police Department	Merkez Mah. Atatürk Bulvarı No:3 Eski/Aksaray Phone: 0382 411 53 00	Security
ESKİL Gendarme District Command	Merkez Mahallesi İnönü Cad. 68800 Eski/Aksaray Phone: 0382 411 40 06	Security
KARAPINAR District Police Department	Pınarbaşı Mahallesi, Pınar Başı Cad. No:136, 42400 Karapınar/Konya Phone: 0332 755 69 14	Security
KARAPINAR Gendarme District Command	İpekçi Mahallesi, İnönü Cad. 42400 Karapınar/Konya Phone: 0332 755 61 15	Security
EVREN District Police Department	Yeni Mahallesi, Cumhuriyet Cad. 06770 Evren/Ankara Phone: 0312 893 55 57	Security
EVREN Gendarme District Command	Esentepe Mah. Güney Küme Evleri Sok. Evren/Ankara Phone: 0312 893 50 05	Security
AKSARAY Provincial Directorate of Family, Labor and Social Services	Zafer Mahallesi DSİ Yanı Huzurevi Binası 68100 Merkez/Aksaray Phone: 0382 212 46 78	Counselling
AKSARAY Provincial Directorate of Health	Çerdiğin Mahallesi Necip Fazıl Kısakürek Cd. 4-1 Merkez/Aksaray Phone: 0382 213 01 22	Counselling
SULTANHANI Health Care Center	İstikamet Mah. Hastane Cad. Sultanhanı/Aksaray Phone:0382 242 20 03	Counselling
EVREN District Directorate of Health	Yeni Mah. Şehit Teğmen Kalmaz Sok. No: 35 , Evren/Ankara Phone:0312 893 51 65	Counselling
KARAPINAR District Directorate of Health	İpekçi Mh. İnümü Sk. No:65 Karapınar / Konya Phone: 0 332 7551568	Counselling

Governmental Agencies		
Service Provider	Address	Service
ORTAKÖY District Directorate of Health	Karşı Mh. Atatürk Cd.Sağlık Sk. Ortaköy/Aksaray Phone: 0382 351 30 74	Counselling
AĞAÇÖREN State Hospital	Yenimahalle Osman Durmuş Cad. Ağaçören/Aksaray Phone: 0382 331 30 76	Medical assistance
ORTAKÖY State Hospital	Zafer Mahallesi Kırşehir Yolu 4. Km Yeni Sanayi Sitesi Karşısı, Ortaköy/Aksaray Phone: 0382 351 81 66	Medical assistance
SARIYAHŞI State Hospital	Özal Mahallesi, 68700 Sarıyahşi/Aksaray Phone: 0382 311 25 59	Medical assistance
ESKİL State Hospital	Merkez Mahallesi, Mehmet Akif Cad. No:84, 68800 Böget Köyü, Eskil/Aksaray Phone: 0382 411 40 59	Medical assistance
KARAPINAR State Hospital	Ulus Mh., D330 No:44, 42400 Karapınar/Konya Phone: 0332 224 00 00	Medical assistance
AKSARAY Courthouse	Taşpazar Mahallesi, Ebulfeyz Elçibey Cad., 68100 Merkez/Aksaray Phone: 0382 216 03 03	Legal aid
ORTAKÖY Courthouse	Plevne Mahallesi, İhsan Özmen Blv. No:231, 68400 Ortaköy/Aksaray Phone: 0382 351 49 56	Legal aid
ESKİL Courthouse	Merkez Mahallesi, Atatürk Cd. No:17, 68800 Eskil/Aksaray Phone: 0382 411 50 09	Legal aid
KARAPINAR Courthouse	Yeni Mahallesi, Derya Sk. No:23, 42400 Karapınar/Konya Phone: 0332 755 18 47	Legal aid
AKSARAY Social Services Center	Kılıçaslan Mah. Bediüzzaman Bul. No:83 68100 Merkez/Aksaray Phone: 0382 222 04 01	Counselling

Non-Governmental Organization		
Service Provider	Address	Service
AKSARAY Foundation of Social Help and Solidarity	Kurtuluş Mahallesi 3846. Sk. Tarım Reformu Bölge Müdürlüğü Binası Kat:1 Merkez/Aksaray Phone: 0382 217 55 86	Counselling
ORTAKÖY Foundation of Social Help and Solidarity	Hükümet Konağı 3.kat Ortaköy/Aksaray Phone: 0382 351 61 33	Counselling
AĞAÇÖREN Foundation of Social Help and Solidarity	Hükümet Konağı 1. Kat 68600 Ağaçören/Aksaray Phone: 0382 331 26 73	Counselling
ESKİL Foundation of Social Help and Solidarity	Hükümet Konağı Kat 2 Eski/Aksaray Phone: 0382 411 44 21	Counselling
SARIYAHŞI Foundation of Social Help and Solidarity	Şafaktepe Mahallesi Cumhuriyet Caddesi Hükümet Konağı Sarıyahşi/Aksaray Phone: 0382 311 26 04	Counselling
EVREN Foundation of Social Help and Solidarity	Cumhuriyet Cad. No:15 Hükümet Binası 2. Kat Evren/Ankara Phone: 0312 893 54 44	Counselling
KARAPINAR Foundation of Social Help and Solidarity	Alaaddin Mahallesi, Konya Cad. Hükümet Konağı No:47, 42400 Karapınar/Konya Phone: 0332 755 61 53	Counselling
AKSARAY Woman Guesthouse	Legally Confidential	Shelter

Annex 5. Consent Form for Service Provider

Number of the
Grievance

CONFIDENTIAL Consent for Release of Information

I, _____, give my permission for BOTAŞ to share information about the incident I have reported to them as explained below:

1. I understand that in giving my authorization below, I am giving BOTAŞ permission to share the specific case information from my incident report with the service provider(s) I have indicated, so that I can receive help with safety, health, psychosocial, and/or legal needs.

I understand that shared information will be treated with confidentiality and respect, and shared only as needed to provide the assistance I request.

I understand that releasing this information means that a person from the agency or service ticked below may come to talk to me. At any point, I have the right to change my mind about sharing information with the designated agency / focal point listed below.

I would like information released to the following:

(Tick all that apply, and specify name, facility and agency/organization as applicable)

- | Yes | No | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Security Services (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Psychosocial Services (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Health/Medical Services (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Safe House / Shelter (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Legal Assistance Services (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Livelihoods Services (specify): _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify type of service, name, and agency): _____ |

1. Authorization to be marked by the survivor:
(or parent/guardian if client is under 18)

Yes No

2. I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

2. Authorization to be marked by the survivor:
(or parent/guardian if client is under 18)

Yes No

Number of the
Grievance

CONFIDENTIAL

Signature/Thumbprint of the survivor: _____
(or parent/guardian if client is under 18)

Caseworker Name: _____ **Date:** _____

Survivor's Name: _____

Name of Caregiver (if client is a minor): _____

Contact Number: _____

Address: _____

(Write questions for Survivor Code Here)

Consent for Release of Information Form

Annex 6. Consent Form for Internal Investigation

Number of the
Grievance

CONFIDENTIAL Consent for Release of Information

I, _____, give my permission for BOTAŞ to share information about the incident I have reported to them as explained below:

1. I understand that in giving my authorization below, I am giving BOTAŞ permission to share the specific case information from my incident report with the investigation committee/focal point.

I understand that shared information will be treated with confidentiality and respect, and shared only as needed.

I understand that releasing this information means that a person from the investigation committee may come to talk to me. At any point, I have the right to change my mind about sharing information with the investigation committee / focal point.

1. Authorization to be marked by client: Yes No
(or parent/guardian if client is under 18)

2. I have been informed and understand that some non-identifiable information may also be shared for reporting. Any information shared will not be specific to me or the incident. There will be no way for someone to identify me based on the information that is shared. I understand that shared information will be treated with confidentiality and respect.

2. Authorization to be marked by the survivor : Yes No
(or parent/guardian if client is under 18)

Signature/Thumbprint of survivor: _____
(or parent/guardian if client is under 18)

Caseworker Name: _____ **Date:** _____

Survivors's Name: _____

Name of Caregiver (if client is a minor): _____

Contact Number: _____

Address: _____

Number of the
Grievance

CONFIDENTIAL

(Write questions for Survivor Code Here)

Consent for Release of Information Form