



modern
AMBALAJ

modern
KARTON

eren
PERAKENDE

MODERN OLUKLU
MUKAVVA AMBALAJ
INDUSTRY AND
TRADE INC.

MODERN KARTON
INDUSTRY AND
TRADE INC.

EREN PERAKENDE
VE TEKSTİL INC.

WORKING CAPITAL FACILITY PROJECT

For Three Affiliate Companies of Eren Holding

GRIEVANCE MECHANISM PROCEDURE (Internal & External)

(Plan No: ER-PRC-SOC-GMP-001)



ASIAN INFRASTRUCTURE
INVESTMENT BANK



Kalkınma
Türkiye Kalkınma ve Yatırım Bankası A.Ş.

APRIL 2022



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TİCARET LTD. ŞTİ.

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List of Abbreviations

AIIB	Asian Infrastructure and Investment Bank
DCC	Document Control Center
E&S	Environmental and Social
EHS	Environmental, Health, and Safety
EHSS	Environmental, Health, Safety and Security
EIA	Environmental Impact Assessment
ESDD	Environmental and Social Due Diligence
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
EU	European Union
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS (H&S)	Health and Safety
HSE	Health, Safety, and Environment
IFC	International Finance Corporation
ILO	International Labor Organization
KPI	Key Performance Indicator
MGS	MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. /MGS Project Consultancy Engineering Trade Limited Co.
Modern Ambalaj	Modern Oluklu Mukavva Ambalaj Industry and Trade Inc.
Modern Karton	Modern Karton Industry and Trade Inc.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OIZ	Organized Industrial Zone
PAP	Project Affected People
PLN	Plan
PRC	Procedure
Project Company	Modern Oluklu Mukavva Ambalaj Industry and Trade Inc. and Modern Karton Industry and Trade Inc.
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SOC	Social
SoW	Scope of Work
SRS	Social Responsibility Staff
The Project	Working Capital Facility Project
TKYB	Türkiye Kalkınma ve Yatırım Bankası A.Ş./ Development and Investment Bank of Turkey
UNESCO	United Nations Educational, Scientific and Cultural Organization
WB	World Bank
WHO	World Health Organization

1. INTRODUCTION

This Grievance Mechanism Procedure (GMP) (Internal and External) is prepared for the following three affiliate companies of Eren Holding to complete the studies and documentation for the management of the potential environmental and social impacts of the Working Capital Facility Project.

-  Modern Oluklu Mukavva Ambalaj Industry and Trade Inc. (Modern Ambalaj)
-  Modern Karton Industry and Trade Inc. (Modern Karton)
-  Eren Perakende ve Tekstil Inc. (Eren Perakende)

Studies and documents related to the management of environmental and social impacts have been carried out for the three companies mentioned above in accordance with the National Environmental Legislation, Turkish Development and Investment Bank (TKYB) Environmental and Social Policy, AIIB Environmental and Social Standards and IFC Performance Standards (“PSs”). In addition to these, all works carried out within the scope of Modern Ambalaj and Modern Karton companies (except for Eren Perakende) were carried out in compliance with the World Bank’s Environmental and Social Standards. (ESSs). The reference number of this Plan is ER-PRC-SOC-GMP-001.

1.1 Background

Eren Holding and its affiliates, operating in the fields of energy, paper, packaging, retail, cement and tourism, which started its commercial life in the textile sector in 1969, are considered one of the largest groups in the country with their equity-based growth strategy. The sectors within the scope of the project are paper, packaging, retail and textile.

Modern Ambalaj

Modern Oluklu Mukavva Ambalaj started its first production at its Çorlu Facility established in 1997. After its facilities in Bursa, Manisa, Istanbul, Gebze and Eskişehir are opened, it became the largest company in Turkey with its annual production capacity of 565,000 tons.

Table 1-1. Capacity of Existing Facilities

Existing Facilities	Total Area (m ²)	Total Closed Area (m ²)	Capacity (ton/year)
Çorlu	90,000	44,000	170,000
Gebze	34,400	33,000	85,000
Eskişehir	46,000	27,000	85,000
Manisa	50,000	28,000	85,000
Kayseri	35,000	22,500	85,000
Bursa	17,500	14,500	55,000
Existing Total Capacity	272,900	169,000	565,000

In addition to the capacity increase expected to be completed in 2020 regarding the Kayseri factory, the company, which researches new investment opportunities in İstanbul-Hadımköy, İzmit-Adapazarı and Bursa, aims to have a capacity of 1.000.000 tons in 2025 in line with these projects.

Corrugated cardboard and boxes are produced by using various papers and starch as raw materials at the facility. There is no paper production at the facility, the paper used in the production of corrugated cardboard is outsourced.

Modern Karton

Paper Group of Eren Holding is the leader of the sector with Modern Karton facility, Turkey's largest corrugated fiberboard producer, and Eren Kağıt Industry and Trade Inc. (Eren Kağıt) operating at various locations Turkey-wide, collecting and bailing wastepaper. Environmentally conscious growth policy of Eren Holding is supported by Eren Kağıt that collects wastepaper and Modern Karton that carries out entire production utilizing such wastepaper collected. Modern Karton has increased annual production capacity above 1,000,000 ton thanks to the investments made in recent years and started exporting part of its output to foreign markets, contributing to the economy of the country.

Modern Karton is located in Tekirdağ Province Ergene District Ergene-2 OIZ on an area of 561,640 m², in a closed area of 210.452 m². The facility operates in Kraftliner, NSSC (Neutral Sulfite Semi Chemical), Fluting, Testliner, White Testliner, Barrier Paper, Packaging Waste Recovery (Paper-Cardboard), Steam Energy, Electric Energy.

Paper production at the facility is made using wastepaper. Thus, while producing the needed paper, it also contributes to the recovering of packaging waste, which is an environmental waste. This situation, which is extremely beneficial in terms of recovering paper packaging waste, has also increased imports due to the lack of wastepaper in Turkey.

All the wastewater released in the paper machine, pulp preparation and chemical preparation department is collected within the pulp preparation department and passed through the DAF (Dissolved Air Flotation) system and sent to the treatment plant. In addition to industrial wastewater, domestic wastewater such as sinks, dining halls, toilets, etc. used by the personnel also comes to the treatment plant.

Eren Perakende




Eren Perakende, which started its commercial life in the textile sector in 1975, carries out the production of world brands that it holds license with advanced technology. It sells the products it produces in the domestic market and also exports it abroad with its retail stores. Eren

Perakende has the certificate of authorization to produce organic products using ecological methods.

The facility, where combed cotton yarn production, yarn (bobbin) dyeing and fabric dyeing processes of Eren Perakende are carried out, consists of three main units: cotton yarn production unit, yarn dyeing unit and fabric dyeing unit. In addition, there is a waste treatment unit established for the treatment of wastewater originating from the operation.

The facility located in Tekirdağ Province, Ergene District, Ergene-2 Organized Industrial Zone, continues its activities on an area of 125,558.46 m², in a closed area of 59,160 m². The closest settlement to the activity area is Ulaş Neighborhood, which is approximately 2 km from the facility area.

The four main processes given below are carried out in the facility owned by Eren Perakende.

-  Combed Cotton Yarn Production Process
-  Yarn (Bobbin) Dyeing Process
-  Fabric Dyeing Process
-  Fabric Washing Process

The headquarters of all facilities within the scope of the project are at Ataşehir Avenue, Metropöl İstanbul, C-2 Blok, 34758, İstanbul, Turkey, which is also the headquarters of Eren Holding. The location, activities, EIA Status, Environmental Permit and License Issues of the facilities of Modern Ambalaj, Modern Karton and Eren Perakende are given in Table 1-2.

Table 1-2. Summary of Facilities

Affiliates	Location	Facility Address	Activity Carried Out	EIA Status	Environmental Permit and License Issue
Modern Ambalaj	Çorlu	Ulaş Neighborhood Omurtak Küme Evler No:25 Ergene 2 OSB Ergene/Tekirdağ	Production of corrugated cardboard and boxes using various papers and starch as raw materials	Out of Scope	<ul style="list-style-type: none"> • Air Emission • Wastewater Discharge
	Gebze	Balçık Neighborhood 3257 Street No:1 Gebze/Kocaeli			
	Eskişehir	EOSB 21 st Street No:33 Odunpazarı/Eskişehir			
	Manisa	İnönü Neighborhood Eren Street. No:2 Muradiye San.Böl.Yunusemre/Manisa			
	Kayseri	OSB 2 nd Street. No:3 Melikgazi/Kayseri			
Modern Karton	Çorlu	Ulaş OSB Neighborhood. D100Street No: 77/33 Ergene / Tekirdağ	Paper production using wastepaper	<p>EIA Positive Decisions</p> <ul style="list-style-type: none"> • Decision No:4310, dated 04.10.2016 • Decision No:6093, dated 12.11.2020 <p>EIA Not Required Decisions</p> <ul style="list-style-type: none"> • Dated 05.08.2021 • Dated 18.12.2020 • Dated 29.12.20015 	<ul style="list-style-type: none"> • Air Emission • Wastewater Discharge • Packaging Waste Recycling • Non-Hazardous Waste Recycling
Eren Perakende	Çorlu	Omurtak Neighborhood Asphalt Boyu Küme Evler No:6 Ulaş Çorlu/Tekirdağ	<p>Combed Cotton Yarn Production</p> <p>Yarn (Bobbin) Dyeing</p> <p>Fabric Dyeing</p> <p>Fabric Washing</p>	<p>EIA Positive Decisions</p> <ul style="list-style-type: none"> • Decision No:4476, dated 30.12.2016 	<ul style="list-style-type: none"> • Air Emission • Wastewater Discharge

Except for the Gebze Facility of Modern Ambalaj, all facilities are within the boundaries of the Organized Industrial Zone. The closest settlements to the facilities are listed in Table 1-3 with their distances and directions.

Table 1-3. Nearest Settlements and Distances to the Project Area

Facility	The Closest Settlement	Distance (m)	Direction	Population			
				Male	Female	Total	
Modern Ambalaj	Çorlu	Kırgöz	1,250	West	621	609	1,230
		Ulaş	100	East	3,838	3,171	7,009
	Gebze	Pelitli	2,000	East	1,104	975	2,079
		Balçık	1,800	North-northwest	680	606	1,286
	Eskişehir	Sevinç	1,800	North	634	595	1,229
		Yassıhöyük	3,200	Northwest	81	76	157
		Kanlıpınar	3,800	South-southwest	127	112	239
	Manisa	Muradiye	30	Northwest	16,524	16,817	33,341
		Karaali	2,500	North-northwest	307	288	595
		Güzelyurt	1,150	East-southeast	10,987	11,294	22,281
	Kayseri	Tınaztepe	1,100	North	5,843	5,757	11,600
Kocatepe		1,750	Northeast	5,393	5,405	10,798	
Sakarya		1,800	Northeast	4,852	4,829	9,681	
Modern Karton	Çorlu	Kırgöz	550	West	621	609	1,230
		Ulaş	250	East	3,838	3,171	7,009
Eren Perakende	Çorlu	Ulaş	1,150	North-northwest	3,838	3,171	7,009

The location of the Project Area is presented below in between Figure 1-1 and Figure 1-5.

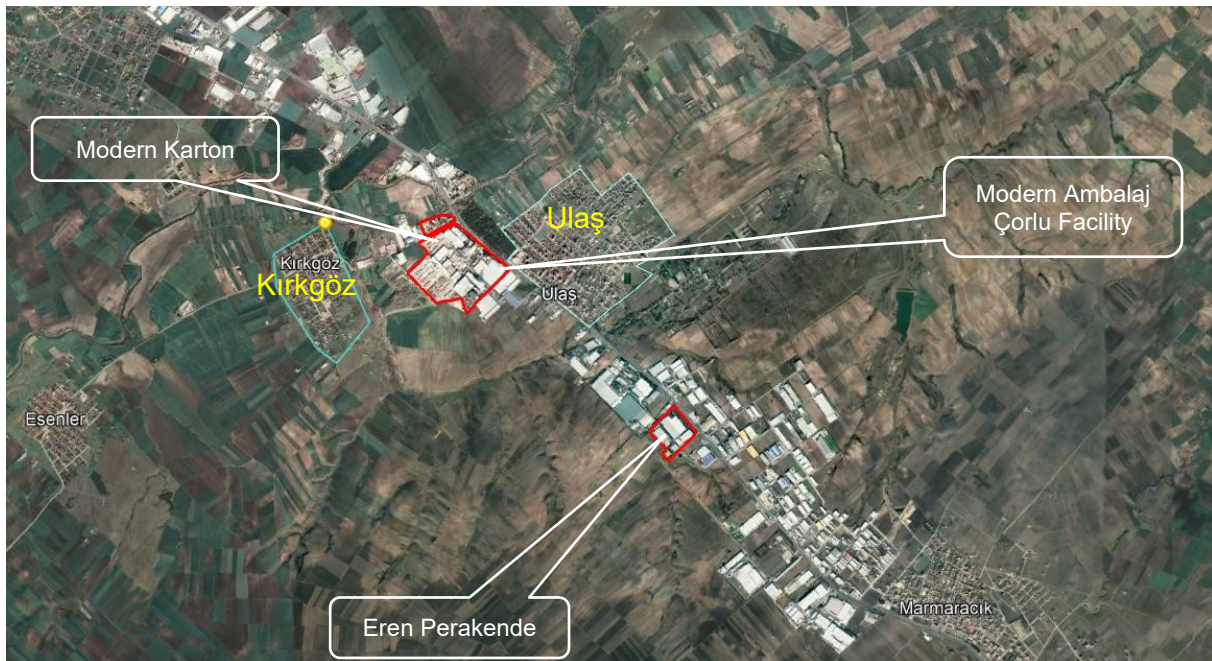


Figure 1-1. Modern Ambalaj Çorlu Facility, Modern Karton and Eren Perakende locations and nearest settlements

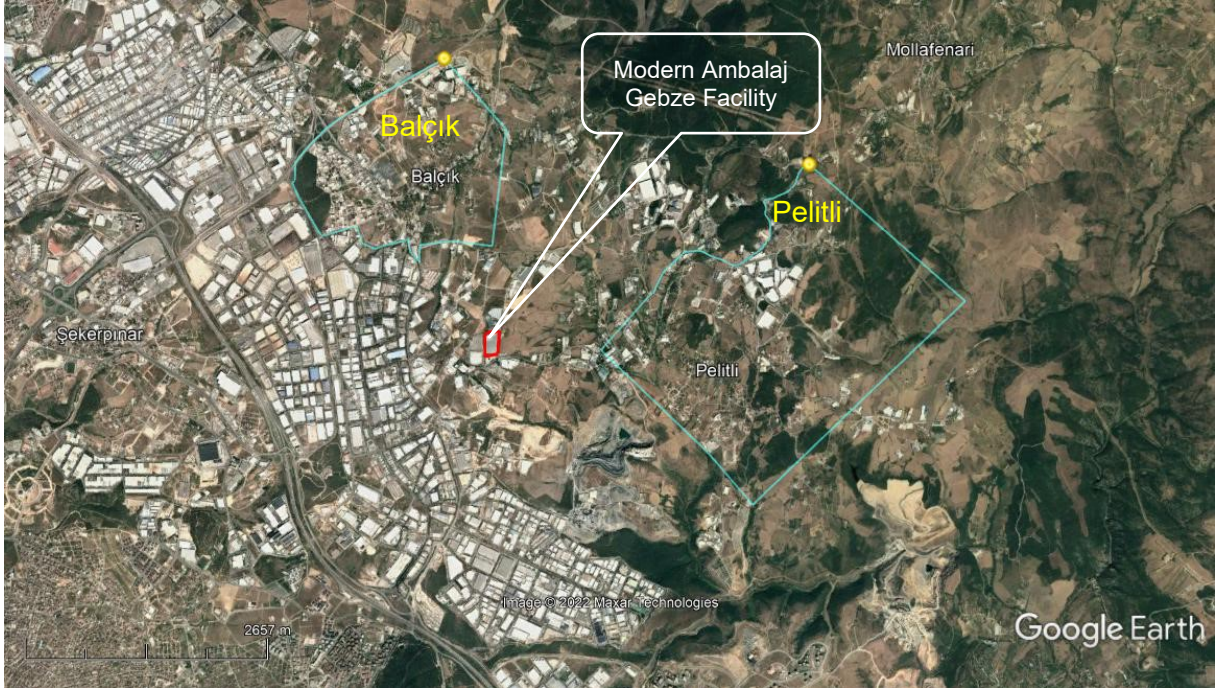


Figure 1-2. Modern Ambalaj Gebze Facility location and nearest settlements



Figure 1-3. Modern Ambalaj Eskişehir Facility location and nearest settlements



Figure 1-4. Modern Ambalaj Manisa Facility location and nearest settlements



Figure 1-5. Modern Ambalaj Kayseri Facility location and nearest settlements

1.2 Scope

This document outlines the grievance mechanism procedure which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints and comments that may arise as a direct or indirect result of the environmental and social performance of the Project. The Grievance Mechanism Procedure (GMP) is not a replacement for stakeholder engagement activities.

This procedure covers all the grievances raised by internal and external stakeholders, including the activities of contractors. This procedure is a part of the Management Plans developed for the Project. This procedure has overlaps and cross-linkages to the Stakeholder Engagement Plan (SEP) (ER-PLN-SOC-SEP-001) and Environmental and Social Management Plan (ER-PLN-HSE-ESMP-001) particularly concerning the contractor's activities.

1.3 Purpose

The purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into business to minimize social risks. The grievance mechanism aims to ensure that all comments and complaints concerning the Project will be considered transparently and the related measures will be taken. The processes and responsibilities of this procedure will be defined for both external stakeholders and internal direct and indirect employees.

This procedure is owned by the Social Responsibility Staff of the Project.

This document aims to identify:

- the scope of grievance mechanism procedure and the applicable management interfaces,
- the definition of roles and responsibilities,
- the applicable project standards, project commitments, operational procedures, and guidance relevant to this Procedure,
- monitoring and reporting procedures, including Key Performance Indicators (KPIs),
- training requirements and references for supporting materials and information,
- the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- how to minimize community conflict by systematically addressing grievances.

Key risks identified addressed by this procedure are:

- To provide a channel for external stakeholder and workers in particular women and illiterate persons to log complaints through engagement activities by Social Responsibility Staff (SRS),
- To establish a transparent and mutually respectful relationship with the employees in general,
- To allow for confidential complaints to be raised and addressed by workers,
- To create a culturally acceptable and accessible process to allow employees to raise their issues, concerns, problems, and claims.

This procedure is not limited but can be updated. The procedure will be reviewed on a minimum of a three-monthly basis during installation and commissioning. During steady-state operations, this procedure will be reviewed on an annual basis to determine if there are any changes or updates required to the procedure unless a more frequent update is required to reflect changing project design or procedures. Any requests for changes to this procedure must be addressed to the owner of this procedure and will be subject to appropriate review and approval processes.

1.4 Definitions

Grievance: An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner.

Complaint: A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.

Grievance Mechanism: A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.

Internal Stakeholders: Groups or individuals within a business who work directly within the business, such as employees and contractors.

External Stakeholders: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

Project Affected People (PAP): Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Vulnerable People: People who by gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2. ROLES AND RESPONSIBILITIES

2.1 Key Principles

The Internal (Worker) and External Grievance Mechanisms will be implemented by relying on the following key principles for all the Project-related comments, issues, and complaints internally and externally.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure clearly and understandably.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individuals or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities is considered in the manner of regional concerns and a convenient resolution process will be taken.

2.2 Roles and Responsibilities

This section includes an overview of the roles and responsibilities of the grievance mechanism procedure.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
General Manager / Board of Manager	<ul style="list-style-type: none"> ➤ Ensuring that this procedure is implemented properly, ➤ Providing necessary resources for the implementation of the procedure.
Operational Manager	<ul style="list-style-type: none"> ➤ Approval of this Plan and resources required for implementation, ➤ Coordinating with parties for implementation of the procedure.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> ➤ Implements and improves this procedure, ➤ Ensuring the Project compliance with the Project Standards and other requirements set out in this Management Plan, ➤ Ensuring that all site staff, including Subcontractors worker's complaints process and resolutions, comply with this Procedure, ➤ Informing to workers about contract details and legal rights, ➤ Determining and provides the necessary training materials for employees, ➤ Determining necessary resources for proper implementation of the procedure and submits to managers, ➤ Evaluating in compliance with laws and regulations, ➤ Searching the causes of the grievance and the social incidents that cause injuries, delays or stoppage in the work and disputes among the Project and communities, ➤ Monitoring all complaints and ensures that all complaints are resolved and closed, ➤ Coordinating with parties for implementation of the procedure, ➤ Creating all necessary reporting of worker grievance including monthly report to the Management, ➤ Investigating and proposes appropriate methodology for resolving the complaint, ➤ Following procedures related to employment and training for site-specific issues, ➤ Recording and reporting general and local employment rates and complaints, which are received or observed verbally, ➤ Filling out a "Complaint Register Form" (see Appendix-C), ➤ Determining necessary resources for proper implementation of this Procedure and submits to his line managers, ➤ Following the results of complaint and report on a weekly, monthly, and annual basis, ➤ Organizing cooperation activities with local communities,

Roles		Responsibilities
		<ul style="list-style-type: none"> ➤ Organizing stakeholder meetings to collect the responses to grievances actively as required.
Health and Safety and Environment (HSE) Expert¹	OHS Expert²	<ul style="list-style-type: none"> ➤ Supporting SRS on the first evaluation of the relevance of grievances collected, ➤ Conducting internal audits/site audits, ➤ Providing answers to the OHS and social grievances raised by employees, the local community, and local institutions, ➤ Helping SRS for keeping the record of the complaints/suggestions in the Grievance Database with details, ➤ Evaluating in compliance with laws, regulations, and Project requirements with legal departments, ➤ Participating and supports the audits that will be done by third-party auditors.
	Environmental Engineer²	<ul style="list-style-type: none"> ➤ Providing answers to the environmental grievances raised by employees, the local community, and local institutions, ➤ Helping SRS for keeping the record of the complaints/suggestions in the Grievance Database with details, ➤ Evaluating in compliance with laws, regulations, and Project requirements with legal departments, ➤ Participates and supports the audits that will be done by third-party auditors.
Contractors / Subcontractors		<ul style="list-style-type: none"> ➤ Complying with the requirements and standards of this procedure, ➤ Fulfilling the works under the contract.

¹ It is currently valid for the Gebze, Eskişehir and Manisa Facilities of Modern Ambalaj.

² It is currently valid for the Çorlu and Kayseri Facilities of Modern Ambalaj and Modern Karton.

3. PROJECT STANDARDS

The implementation and the procedure of this plan developed for Working Capital Facility Project of Three Affiliate Companies of Eren Holding will comply with the related national and international requirements and standards. The Project Standards involves:

- World Bank Group Standards³
- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- Asian Infrastructure and Investment Bank (AIIB) Environmental and Social Framework⁴
- Turkish Development and Investment Bank (TKYB) Environmental and Social Policy,
- applicable international standards and guidelines.

3.1 Applicable Turkish Standards

The Constitution of The Republic of Turkey

The main document of the national requirements and standards is “The Constitution of The Republic of Turkey” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

X. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

³ All works carried out within the scope of Modern Ambalaj and Modern Karton companies (except for Eren Perakende) were carried out in compliance with the World Bank’s Environmental and Social Standards. (ESSs).

⁴ The requirements and standards of this framework have been implemented for all facilities within the scope of the project.

VII. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

VIII. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

VII. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labour Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or

indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

Turkish EIA Requirements and Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 17 July 2008, no 26939) is defined which includes a limited public disclosure process.

3.2 Applicable International Standards and Guidelines

The international standards and guidelines which the Project will follow are set by International Finance Corporation (IFC), World Bank Group Standards and Asian Infrastructure and Investment Bank (AIIB). IFC Performance Standards and Guidance Notes which are relevant internal and external grievance mechanisms are:

- *Performance Standard 1 (PS1): Assessment and Management of Environmental and Social Risks and Impacts*
- *Guidance Note 1 (GN1) on Assessment and Management of Environmental and Social Risks and Impacts*
- *Performance Standard 2 (PS2): Labor and Working Conditions*
- *Guidance Note 2 (GN2) on Labor and Working Conditions*
- Environmental and Social Policies
 - OP/BP 4.01 Environmental Assessment
 - 2010 Access to Information Policy
 - AIIB ESS 1 Environmental and Social Assessment and Management

Key objectives of *PS1* related to external grievance management are:

- To identify people/communities who have comments/grievances about the Project, as well as other interested parties and evaluate these environmental and social risks,
- To adopt mitigation measures to prevent and minimize social risks and impacts, and where residual impacts remain, compensate for risks and impacts to workers, Affected Communities, and the environment.
- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- To promote and provide sufficient engagement with Affected Communities during the Project about issues which may affect them,
- To maintain a healthy relationship with stakeholders through adequate engagement during project implementation.

Key requirements of *PS1* involve:

- To develop a grievance mechanism to receive and facilitate the resolution of Affected Communities' concerns and grievances related to environmental and social performance of the Project,

- To identify the risks and impacts of the Affected Communities and other stakeholders,
- To maintain an understandable, culturally appropriate, accessible and transparent consultation to stakeholders through early and ongoing engagement,
- To inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
- To follow the developed grievance mechanism to receive and respond to stakeholder concerns related to the Project promptly.
- To establish a monitoring and review procedures of the concerns and grievances raised by Affected Communities and stakeholders.

Key objectives of PS2 related to worker grievance management are:

- To create equal, fair, and nondiscriminatory working opportunities for every worker,
- To develop, maintain, and improve the worker-management relationship,
- To promote compliance with national employment and obey the labor laws,
- To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain by developing a reliable grievance mechanism,
- To identify, evaluate and respond to workers concerns and grievances in a timely manner,
- To promote safe and healthy working conditions to direct and indirect workers,
- To avoid the use of forced and child labor.

Key requirements implemented by the Project according to PS2 are as following:

Human Resources Policy, Terms of Employment and Working Conditions & Relationship

- The Project will adopt and implement human resources policies and procedures which are provided to workers with documented information clearly, regarding their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation, and benefits.
- The Project will make all policies understandable to all workers.
- The Project will respect the terms of a collective bargaining agreement, if there exists, and provide reasonable working conditions and terms of employment.

Workers' Organizations

- The Project will comply with the national labor law which contains rights of workers to form and to join workers' organizations.
- If national law restricts the right to organize and workers' organizations, the Project will enable the means for workers to bargain collectively and to organize and establish an alternative way for workers to file grievances.
- The Project will not discriminate against workers who choose to organize and create equal conditions for all the workers.
- Worker representatives should be given access to management.

Non-Discrimination and Equal Opportunity

- The Project will hire, promote, and compensate workers solely based on their ability to do the job and all workers are provided equal access to training, tools and opportunities for advancement.
- The Project will ensure that all workers will be free from harassment by management or other workers.

Retrenchment

- The Project will establish and implement a procedure to mitigate the adverse impact of retrenchment and carry out an analysis of alternatives to retrenchment.
- The procedure will incorporate non-discrimination principles and include the input of workers, their organizations, where appropriate, the government.

Child Labor

- The Project will not employ workers under the minimum age for employment as defined by national law.
- Workers between the minimum age and 18 will not be employed in dangerous work or work that interferes with their education or development.

Forced Labor

- The Project will not employ forced labor which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.
- The Project will respect and protect rights of workers to retain their personal documents and money.

- The Project will respect the rights of workers to leave the workplace after work.

Grievance Mechanism

- The Project will provide a grievance mechanism for workers and develop it as a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- The Project will ensure that there will be no discrimination against those that express grievances and all the grievances are considered seriously and take prompt, appropriate action.
- Any grievance mechanism will not replace other channels as defined by law or collective bargaining agreements.

Occupational Health and Safety

- Workers are not unreasonably endangered at work or in dormitories and all the necessary precautions to mitigate work-related risks and develop an emergency prevention and response system.
- Workers will be provided personal protective equipment and will be trained in its use.
- The Project will document and report accidents, diseases, and incidents during the Project.

Workers Engaged by Third Parties

- The Project will extend the labor standards performance policies and procedures to contractors hired directly or through employment agencies.
- The Project will not use contracting as a means of circumventing labor rights and laws and will ensure all the workers have access to a grievance mechanism.
- The Project will monitor contractors, employment and recruitment agencies to verify their adherence to labor rights and laws.

Supply Chain

- The Project will extend the implementation of these key requirements of PS2 as feasible to the suppliers.
- The Project will identify the risks of child labor or forced labor in the supply chain and notify the suppliers of the PS2 requirements to prevent its presence.
- The Project will monitor the performance of suppliers according to PS2 requirements concerning child labor and forced labor and significant safety issues.

The World Bank Environmental and Social Safeguard Policies include environmental assessments of projects and other policies regarding environmental and social adverse impacts, and mitigation and prevention. Specific policies relevant to the stakeholder engagement are listed below:

OP/BP 4.01 Environmental Assessment

The main objectives and tasks of the OP/BP 4.01 Environmental Assessment are ensuring environmental and social sustainability of proposed projects, informing decision-makers about environmental and social risks and increase transparency through stakeholder participation in decision making.

2010 Access to Information Policy

The World Bank recognizes that transparency and accountability are of fundamental importance to the development process and to achieving its mission to alleviate poverty. Transparency is essential to building and maintaining public dialogue and increasing public awareness about the Bank's development role and mission. It is also critical for enhancing good governance, accountability, and development effectiveness. Openness promotes engagement with stakeholders, which, in turn, improves the design and implementation of projects and policies, and strengthens development outcomes. It facilitates public oversight of Bank-supported operations during their preparation and implementation, which not only assists in exposing potential wrongdoing and corruption, but also enhances the possibility that problems will be identified and addressed early on.

Key issues included regarding grievance mechanism in AIIB ESS 1 are as follows:

➤ Environmental Coverage:

- Environmental Risks and Impacts
- Biodiversity Impacts
- Critical Habitats
- Natural Habitats
- Protected Areas
- Sustainability of Land and Water
- Pollution Prevention
- Resource Efficiency
- Climate Change
- Greenhouse Gases

➤ Social Coverage

- Vulnerable Groups and Discrimination
- Gender
- Land and Natural Resource Access
- Loss of Access to Assets or Resources or Restrictions on Land Use
- Cultural Resources
- Working Conditions and Community Health and Safety
 - Safe Working Conditions and Community Health and Safety
 - Child Labor and Forced Labor
 - Labor Management Relationships in Private Sector Projects
 - Building Safety
 - Traffic and Road Safety
 - Security Personnel

3.3 Other Commitments and Requirements

There are no other applicable commitments and requirements of Turkish Government authorities related to this plan.

4. INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

The process to be followed to resolve any grievances is described in Figure 4-1 below.

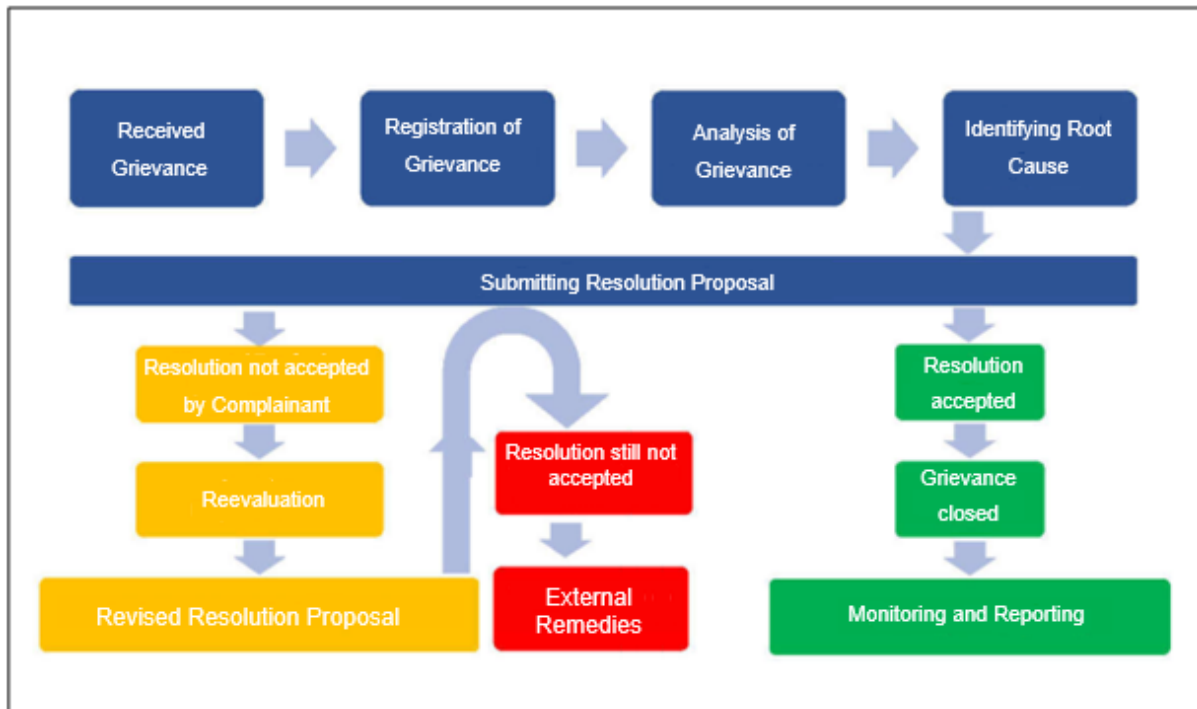


Figure 4-1. Processes of Internal and External Grievance Management

4.1 Internal (Worker) Grievance Management Process

Workplace or job-related problems of Modern Karton, Modern Ambalaj and Eren Perakende employees are dealt with by department chiefs - worker representatives and personnel department officials, and their problems are tried to be resolved.

Employees have the right to express any problems such as break times during the day, and in case of emergency, the problem is immediately communicated to the relevant persons and the necessary action is taken.

A Wish and Complaint Procedure will be implemented to identify, evaluate, finalize and continuously improve all suggestions and complaints of all personnel working at Eren Perakende (see Appendix-A).

All kinds of complaints and suggestions are provided through the "Wish and Complaint" boxes placed in the business and changing rooms. Personnel who want to make a wish or complaint about any issue, write their complaint or wish on any piece of paper and put it in one of the boxes. There is no obligation to write the name of the person making the complaint. Our staff can also make their wishes and complaints verbally. It can do it directly to their superiors or to union representatives elected by the union.

Employees who make any complaints will not be retaliated or mistreated. All employees can voice their complaints and wishes without any discrimination. Everyone's complaint is of common importance and is given equal importance. Complainants are kept confidential and necessary actions are taken.

At the end of each month, all complaint boxes are opened and evaluated by the union representative and the OHS expert. The evaluation team decides which complaint or suggestion to respond to. After the boxes are opened, the Evaluation team makes the necessary decision about the complaint by meeting among themselves.

If the complaint or suggestion is of a type that can be resolved immediately, the problem that is the subject of the complaint is immediately resolved by the people who make the assessment, by contacting the relevant departments.

If the problem that is the subject of the complaint is of a type that will be resolved in the long term, this complaint is addressed at weekly meetings or OHS meetings, the problem is resolved by finding the necessary solutions, or the suggestion made is evaluated and improvement is made.

Evaluation results are published the following month, and employees are informed by hanging them on the boards. The identity of the petitioner or complaint owner is kept confidential during the process from the declaration of the wishes or complaints to the announcement.

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments and concerns (see Appendix-B). Since the confidentiality of the complainant should be preserved, grievances are collected in grievance boxes which are placed in areas workers can easily access, including dining rooms. Through these forms, workers are also able to make anonymous complaints. Information on how to express complaints, opinions and suggestions to workers will be provided during the induction training process. Written submissions will not be used in any way to intimidate those submitting the complaints.

It is possible to extend the process for the complex grievances and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during solution process. Social Responsibility Staff aims to respond in cooperation with the related department and solve each complaint within 30 days. The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this procedure should be fulfilled.

4.1.1 Implementation and Updates of the Procedure

During steady-state operations, this procedure will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs. The revision of this procedure will be the responsibility of the “Social Responsibility Staff (SRS)” who is the custodian of the procedure.

If material changes to operating procedures are required, the procedure may be updated on an “as required” basis. If there is any revision on this procedure, it will be uploaded to the Document Control Center (DCC) of the Project to ensure that all staff has access to the latest version of this procedure.

4.2 Customer Grievance Management Process

Modern Karton implements the Customer Relationship Management Procedure, which determines the authorities, methods and responsibilities for the actions to be taken for the continuous improvement of the product and service quality, by evaluating the demands, complaints and customer feedback regarding the products or services offered to the customer and by measuring the customer satisfaction (see Appendix-G).

"Customer Relations Management Procedure" is applied in Modern Ambalaj in order to determine the method, authority and responsibilities for receiving customer complaints, forwarding them to the relevant departments and evaluating them. The customer, who submits the complaint within two weeks at the latest after the complaint is received, is informed about the receipt of the complaint. After the complaint is investigated, the suggested actions are notified to the customer within three months at the latest. If more time is needed to investigate the complaint, the customer and the certification body are informed. As a result of the investigation regarding the complaint, the certification body and the complaining organization are informed about the actions.

In addition to this customer related grievance mechanism procedure, following external grievance management process will be implemented for grievances raised by all stakeholders such as local communities, governmental or non-governmental organizations, universities, media etc.

4.3 External Grievance Management Process

The steps of the grievance management process consist of receiving the grievance, assessing, sending acknowledgment, investigating, feedback to stakeholder, implementing the remediation activities and closeout.

4.3.1 Receiving Grievances

Grievances are received through all available channels such as phone, mail, grievance forms, websites, contractors and etc. The stakeholder can raise a grievance by filling out the grievance form. Once the form is completed then SRS will process the form according to the grievance procedure.

Table 4-1. Details of Contacts

Modern Oluklu Mukavva Ambalaj Industry and Trade Inc.	Contact Person on the Project Site
<p>Website: http://www.modern-ambalaj.com.tr/</p> <p>Çorlu Facility Address: Ulaş Neighborhood Omurtak Küme Evler No:25 Ergene 2 OSB Ergene/Tekirdağ</p> <p>Phone: +90 (282) 655 62 79</p> <p>Gebze Facility Address: Balçık Neighborhood 3257 Street No:1 Gebze/Kocaeli</p> <p>Phone: +90 (262) 751 39 99</p> <p>Eskişehir Facility Address: EOSB 21st Street No:33 Odunpazarı/Eskişehir</p> <p>Phone: +90 (222) 322 21 11</p> <p>Manisa Facility Address: İnönü Neighborhood Eren Street. No:2 Muradiye San.Böl.Yunusemre/Manisa</p> <p>Phone: +90 (236) 214 01 66</p> <p>Kayseri Facility Address: OSB 2.Cad. No:3 Melikgazi/ KAYSERİ</p> <p>Phone:+90 (352) 322 21 05</p> <p>Email: info@modern-ambalaj.com.tr</p>	<p>Phone: To be determined.</p> <p>E-Mail: To be determined.</p> <p>Address: To be determined.</p>
Modern Karton Industry and Trade Inc.	Contact Person on the Project Site
<p>Website: http://www.modern-ambalaj.com.tr/</p> <p>Address: Ulaş OSB Neighborhood. D100Street No: 77/33 Ergene / Tekirdağ</p> <p>Phone: +90 (282) 655 58 21</p> <p>Email: modernkarton@modernkarton.com.tr</p>	<p>Phone: To be determined.</p> <p>E-Mail: To be determined.</p> <p>Address: To be determined.</p>
Eren Perakende ve Tekstil Inc.	Contact Person on the Project Site
<p>Website: https://www.erenperakende.com/</p> <p>Address: Omurtak Neighborhood Asfalt Boyu Küme Evler No:6 Ulaş Çorlu/Tekirdağ</p> <p>Phone: +90 (282) 655 53 16</p> <p>Email: info@erentekstil.com.tr</p>	<p>Phone: To be determined.</p> <p>E-Mail: To be determined.</p> <p>Address: To be determined.</p>

The Grievance Register Form (see Appendix-C) will be used to collect the information about grievances, concerns and the complainant. All grievances will be recorded and collected in the Grievance Database (see Appendix-F). “Open door policy” will not be encouraged as the one and only way of communication, therefore, written complaints anonymously (or not) should be encouraged.

4.3.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into “Grievance Database” (see Appendix-F). The Social Responsibility Staff investigates the grievance and makes the first evaluation with the help of other related departments. The Project investigates the grievance and involves appropriate departments in its investigation and formulation of a resolution.

The complainant may be contacted (if not anonymous) to gather more information, using the “Consultation Form” (see Appendix-E). Any correspondence with the Complainant will be recorded in the “Complaint Register Database”. When final decision is made on grievance, feedback will be given to stakeholder.

4.3.3 Feedback to Stakeholder

Complainants will receive a formal response acknowledging that the Project has received the grievance, within 5 working days of submitting the grievance. Complaints received anonymously will be investigated in the same manner as non-anonymous complaints, but no formal response will be issued.

4.3.4 Propose Resolution/Corrective Action

Within 30 calendar days of receipt of the grievance, responsible person from the Project will formally communicate a proposed resolution or corrective action to the complainant (if not anonymous) and discuss it with the complainant. The complainant will be informed about the methodology followed. All communication will be recorded in the “Complaint Register Database”.

4.3.5 Close-Out of Grievances

The grievance procedure of the Project aims to formally close out every grievance within 30 calendar days after receiving it unless an alternative agreement is made with the complainant. Note that this alternative agreement must be reached within these 30 calendar days. Close-out requires the signature of the complainant (if not anonymous) on the Grievance Closure

Form, which details the agreed resolution. The signed “Grievance Closure Form” will be recorded in the “Complaint Register Database”.

4.3.6 Non-Resolution Case

If a grievance cannot be resolved although efforts will be made to solve the concern within the set timeframe, the Project will involve other external experts, neutral parties or local and regional authorities, as necessary and appropriate.

5. MONITORING

5.1 Overview of Monitoring Requirements

In compliance with the Project Standards which is described in Section 3 of this procedure, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

5.2 Key Monitoring Activities

The key monitoring activities are used to assess grievance management. The Project will also monitor the efficiency and application of the third-party grievance mechanism. The procedures and the grievance management tool will be adjusted as required. Key monitoring measures are set out in Table 5-1 below.

Table 5-1. Key Monitoring Measures

Topic	Indicator	Method	Period	Location
Grievances/ Concerns	<p>The Project will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> ➤ number of outstanding complaints and grievances opened in the month, ➤ number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), ➤ number of complaints grievances closed in the month; and ➤ type of grievance. 	Grievance Records	Monthly	Site office
Customer Satisfaction	Social Responsibility Staff will keep records written and verbal complaints raised by customers.	Customer Grievance Records and Satisfaction Surveys	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc. and consultation forms will be filled out.	Visitor Records	Monthly	Site office
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Site office
Disclosure Materials/ Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office

5.3 Key Performance Indicators (KPIs)

The Table 5-2 below summarizes the key performance indicators and related key monitoring actions. These can be used to assess the progress and effectiveness of the proposed mitigation strategies.

Table 5-2. Key Performance Indicators (KPIs)

KPIs	Target	Monitoring Measures
Total number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Target of 70%	Grievance Database
% of complaints that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Annual audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report

6. TRAINING

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training will be also provided as necessary including grievance management. The implementation of this grievance mechanism will be followed by the Social Responsibility Staff and other personnel and supervisors of the Project. Contractors are also involved in or overseeing activities with local communities.

6.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers. The trainings will be given in the first “Induction Training” session. All employees of the Project and contractors are required to participate in community relations and human rights training. This training will provide the information on how to understand and respect different cultures and opinions and to be an effective team member by behaving appropriately with locals and colleagues.

6.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Grievance Management is also provided to the Social Responsibility Staff (SRS) and other personnel and supervisors of the Project and contractors involved.

7. AUDIT AND REPORTING

In this section, auditing internally and externally is involved. For the Project activities, record keeping, and reporting basics are explained.

7.1 Internal and External Auditing

Internal and External Audits will be carried out in order to ensure the assessment of the mechanism's efficiency by Social Responsibility Staff. Conformance and aspects of this procedure, which are subject to regulatory audits, will be monitored in accordance with the Project Environmental, Health, Safety and Social Management System and separately by Project Lenders. Daily conformance will be monitored in accordance with the Project Management System. Contractors will be subject to inspection and audit by the Project prior to a contractor's initial appointment.

7.2 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and closeout of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- News on press and interviews,
- Audits, investigations, and incidents which will be managed according to the Project procedures.

On a monthly basis, an overview of the grievances recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out will be developed periodically. The Social Responsibility Staff (SRS), Environmental Engineer and OHS Expert (or EHS Expert) will evaluate and conclude this overview with project management in the monthly progress meetings.

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APPENDIXES

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Eren Perakende

Appendix A: Wish & Complaint Procedure

 PERAKENDE VE TEKSTİL	Dilek ve Şikayet Prosedürü	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>Doküman No</td> <td>: IK009</td> </tr> <tr> <td>İlk Yayın Tarihi</td> <td>: 30.07.2020</td> </tr> <tr> <td>Revizyon Tarihi</td> <td>: 03.09.2021</td> </tr> <tr> <td>Revizyon No</td> <td>: 02</td> </tr> <tr> <td>Sayfa No</td> <td>: 1/2</td> </tr> </table>	Doküman No	: IK009	İlk Yayın Tarihi	: 30.07.2020	Revizyon Tarihi	: 03.09.2021	Revizyon No	: 02	Sayfa No	: 1/2
Doküman No	: IK009											
İlk Yayın Tarihi	: 30.07.2020											
Revizyon Tarihi	: 03.09.2021											
Revizyon No	: 02											
Sayfa No	: 1/2											

1. Amaç
Bu prosedürün amacı, Eren Perakende ve Tekstil AŞ'de çalışan tüm personelin, her türlü öneri ve şikayetlerinin tespit edilmesi, değerlendirilmesi, sonuçlandırılması ve sürekli iyileştirilmesini sağlayacak bir sistem belirlemektir.

2. Kapsam
Kuruluşumuzda, tespit edilen veya şikayet değerlendirme ekibine iletilen, her türlü şikayet ve önerinin değerlendirilmesi faaliyetlerini kapsar.

3. Sorumluluklar
Bu prosedürün uygulanmasından, İnsan Kaynakları, Sendika Temsilcisi sorumludur.

4. Tanımlar
Şikayet: Yazılı olarak bildirilen, her türlü hoşnutsuzluk-olumsuzluk belirten dokümanlardır.
Öneri: Bir sorunu çözmek veya incelenmesi için ileri sürülen görüş, düşünce ve teklif.

5. Uygulama
Firmamızda, her türlü şikayet ve öneri için, işletme ve soyunma odalarına konulan, "Dilek ve Şikayet" kutuları vasıtası ile sağlanmaktadır. Her hangi bir konuda, dilek veya şikayette bulunmak isteyen personel, şikayetini veya dileğini her hangi bir kağıda yazarak, kutulardan birisine atar. Şikayette bulunan kişinin ismini yazma zorunluluğu yoktur. Personelimiz dilek ve şikayetlerini sözlü olarak da yapabilir. Doğrudan amirlerine veya sendika tarafından seçilen sendika temsilcilerine yapabilir..

Herhangi bir şikayette bulunan çalışana misilleme veya kötü davranışta bulunulmaz. Tüm çalışanlar, herhangi ayrımcılık yapılmaksızın, şikayetlerini ve dileklerini dile getirebilir. Herkesin şikayeti ortak öneme sahip olup, eşit önem verilir. Şikayet sahipleri gizli tutularak gerekli işlemler yapılır.

Her ayın sonunda sendika temsilcisi, İSG uzmanı tarafından bütün şikayet kutuları açılarak, değerlendirmeye alınır. Değerlendirme ekibi, hangi şikayete veya öneriye geri dönüş yapılacağına karar verir. Kutular açıldıktan sonra, Değerlendirme ekibi, kendi aralarında toplantı yaparak, şikayet ile ilgili gerekli kararını verir.

Şayet şikayet veya öneri hemen giderilecek türden ise, değerlendirmeyi yapan kişiler tarafından, şikayete konu olan problem, ilgili bölümlerle görüşülerek hemen giderilir.

Hazırlayan	Kontrol Eden	Onaylayan
Sürdürülebilirlik Sorumlusu Arcan Aman	İnsan Kaynakları Müdürü Esra Göçer	Genel Müdür Yardımcısı Gürkan Şenel

 PERAKENDE VE TEKSTİL	Dilek ve Şikayet Prosedürü	Doküman No : IK009
		İlk Yayın Tarihi : 30.07.2020
		Revizyon Tarihi : 03.09.2021
		Revizyon No : 02
		Sayfa No : 2/2

Şayet, şikayete konu olan problem, uzun vadede giderilecek türden ise, bu şikayet, haftalık toplantılarda veya ISG toplantılarında ele alınarak gerekli çözümler bulunarak sorun giderilir veya yapılan öneri değerlendirmeye alınarak, iyileştirme yapılır.

Değerlendirme sonuçları bir sonraki ay yayınlanarak panolara asılarak çalışanlara bilgi verilir.

Dilek veya şikayetlerin beyan edilmesinden duyurulmasına kadar olan süreçte, dilek veya şikayet sahibinin kimliği gizli tutulur.

Hazırlayan	Kontrol Eden	Onaylayan
Sürdürülebilirlik Sorumlusu Arcan Aman	İnsan Kaynakları Müdürü Esra Göçer	Genel Müdür Yardımcısı Gürkan Şenel

Appendix B: Internal Grievance Form

Internal Grievance Form		
Reference No:		
Full Name Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent	Name & Surname: _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance:		What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Case summary:		
Date of Incident/Grievance		
	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem?		
Only for internal usage: Status of complaint		
	Date:	Signature:
Complaint is closed by:		
Actions taken (Provide details):		

Appendix C: Grievance Register Form

Grievance Register Form					
Reference No:					
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent				
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted				
Details Related to Grievance:					
Description of Incident or Grievance: _____ What happened? Where did it happen? Who did it happen to? What is the result of the problem?					
Case summary:					
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)				
What would you like to see happen to resolve the problem? 					
Only for internal usage: Status of complaint					
The complaint is closed by:	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Date:</td> <td style="width: 50%; border: none;">Signature:</td> </tr> <tr> <td style="border: none; height: 20px;"></td> <td style="border: none; height: 20px;"></td> </tr> </table>	Date:	Signature:		
Date:	Signature:				
Actions taken (Provide details):					

Appendix D: Grievance Closure Form

Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Date:	Name Surname / Signature of the Person Closing the Complaint
...../...../.....	Name, Surname / Signature of Complainant

Appendix E: Consultation Form

Consultation Form									
Reference No:									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			Communication Type						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

Appendix G: Customer Relationship Management Procedure of Modern Karton

	MÜŞTERİ İLİŞKİLERİ YÖNETİM PROSEDÜRÜ	DOKÜMAN NO	MI-PR-002
		İLK YAYIN TARİHİ	04.04.1999
		REVİZYON TARİHİ	20.01.2021
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1. AMAÇ

Modern Karton olarak müşteriye sunulan ürün ya da hizmetler ile ilgili talepleri, şikayetleri, müşteri geri beslemelerini değerlendirerek ve müşteri memnuniyeti ölçülerek, ürün ve hizmet kalitesinin sürekli gelişmesine yönelik yapılacak işlemler için yetki, yöntem ve sorumlulukları belirlemektir.

2. KAPSAM

Müşteri ile aşağıdaki konulardaki ilişkileri kapsar.

- Müşteriden gelen yazılı ve sözlü şikayetler,
- Müşteri ziyaretleri ve ziyaret raporları,
- Müşteri talep ve geri beslemeleri,
- Müşteri iadeleri,
- Müşteri memnuniyeti ölçüm anketi,
- Müşteri denetimleri.

3. TANIMLAR

MK: Modern Karton San.ve Tic. A.Ş

DF: Düzeltici Faaliyet

QDMS: Doküman Yönetim Programı

FSC: Orman Yönetim Konseyi

PEFC: Orman Belgelendirme Onay Programı

4. UYGULAMA

4.1. Müşteriden gelen yazılı ve sözlü şikayetler

4.1.1. MK' da yazılı veya sözlü müşteri şikayetleri, Genel Müdür, Satış Müdürlüğü, Müşteri Temsilcileri, Kalite Sistem Müdürlüğü tarafından alınır.

4.1.2. Müşteriden, şikayete konu olan ürün ya da hizmet ile ilgili belirleyici, geriye dönük izlenebilirliği sağlayacak bilgiler (bobin numarası, sevk tarihi, araç plakası vb.) alınır. Müşterimizden ürün/levha numunesi göndermesi istenir. Numune mevcut değil ise mutlaka şikayetin görseli istenir.

4.1.3. Alınan şikayet sözlü ise yazılı hale getirilir ve Müşteri Temsilcileri tarafından QDMS programına girilir. QDMS programına girilen tüm şikayetler Kalite Sistem Müdürlüğü tarafından onaylanır ve çözüm ekibi olarak şikayet ile ilgili bölüm seçilir. Şikayetlerin takibi (kök neden analizi- aksiyon açma-aksiyon gerçekleştirme- sonuç raporu-değerlendirme) bu program üzerinden, QDMS Müşteri Şikayetleri Modülü Talimatı' na göre yapılır.

4.1.4. Kalite Sistem Müdürlüğü, ilgili bölümler ile görüşerek firmaya ziyaretin gerekli olup olmadığını belirler. Ziyaret gerekli ise, müşteri ile haberleşmeyi sağlayarak uygun organizasyonu yapar.

4.1.5. Kalite Sistem Müdürlüğü tarafından, şikayete konu olan ürün ya da hizmet ile ilgili alınan bilgilerden geriye

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Tuğba ÇAKMAKÇI Kalite Sistem Uzman Mühendisi	Emine İŞÇAN TÜRKDEMİR Kalite Sistem Müdürü	Emine İŞÇAN TÜRKDEMİR Kalite Sistem Müdürü	1/5

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dönük inceleme, gerekirse ilgili birimlerden ayrıntılı rapor istenerek araştırma yapılır.

- 4.1.6.** Müşterinin zararı varsa karşılanması, üründe kalite düşürülmesi veya reklamasyon kabul kararı 'Maliyet/İadeye Dönüştürülen Şikayet Onaylama Akışı Destek Dokümanı' na göre verilir. Gerekli işlemler; üretimin-sevkiyatın tekrarlanması, fiyat indirimi gibi zararı tazmin edici işlemler Kalite Sistem Müdürlüğü tarafından Fabrika Müdürü, Mali İşlerden Sorumlu Genel Müdür Yardımcısı, Satış Müdürlüğü ve gerekli birimlere bildirilir. QDMS Müşteri şikayetleri modülünde ilgili şikayete şikayet maliyeti girişi mutlaka yapılır.
- 4.1.7.** Müşteri şikayetleri ile ilgili, işletme çalışanlarından ve yöneticilerinden de katılım olacak şekilde aylık toplantılar yapılır. Bu toplantılarda önceki aya ait gelen şikayetler konusunda Kalite Sistem Müdürlüğü tarafından bilgilendirme yapılır. Şikayetin tekrar etmemesi için kararlar alınır ve toplantı tutanağına kaydedilir. Toplantı tutanağı Kalite Sistem tarafından ilgili bölümlere duyurulur. Toplantı tutanağında belirtilen kararlar için QDMS Aksiyon Yönetimi modülünden aksiyonlar açılır. Alınan kararların takibi Kalite Sistem Müdürlüğü tarafından yapılır.
- 4.1.8.** FSC CoC sertifikası kapsamında ilgili şikayetler aşağıdakiler dahil olmak üzere yeterince değerlendirilir ve ilgili şikayet için QDMS kaydı oluşturulur;
- Şikayette bulunan müşteriye, şikayetin alındığını en geç 2 hafta içinde bildirmek,
 - Şikayeti araştırmak ve 3 ay içinde önerilen eylemleri belirlemek, (daha fazla süreye ihtiyaç var ise, müşteri ve belgelendirme kuruluşuna bildirmek)
 - Belgelendirme şartlarına uygunluğu etkileyen süreçlerde bulunan şikayet ve eksikliklere karşı uygun önlemleri almak,
 - Şikayet, başarılı bir şekilde kapatıldığında, şikayet sahibi müşteriye ve belgelendirme kuruluşunu bilgilendirmek.
- 4.1.9.** PEFC CoC sertifikası kapsamında ilgili şikayetler aşağıdakiler dahil olmak üzere yeterince değerlendirilir ve ilgili şikayet için QDMS kaydı oluşturulur;
- Şikayette bulunan müşteriye, şikayetin alındığını 10 iş günü içerisinde resmen bildirmek,
 - Şikayeti değerlendirmek, doğrulamak ve gerekli tüm bilgileri toplayarak şikayet hakkında bir karar vermek,
 - Şikayete ve şikayeti ele alma sürecine ilişkin kararları şikayette bulunan müşteriye resmi olarak iletmek,
 - Gerekirse uygun düzeltici faaliyetlerin alınmasını sağlamak.

4.2 Müşteri ziyaretleri ve ziyaret raporları

4.2.1. MK adına yapılan müşteri ziyaretlerinde;

- Müşterinin istek ve talepleri,
- Bugün ve gelecekte MK'nın ürün ve hizmetlerinden beklentileri,
- Varsa yatırım planları,
- MK'ya genel bakış,

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konularında müşteriden bilgi alınmaya çalışılarak ziyaret sonrasında yapılan tonaj anlaşması varsa fiyat ve tonaj bilgileri aylık olarak düzenlenen tabloya işlenir.

4.2.2. Müşteri ziyaretlerinde Kalite Sistem Müdürlüğü'nü ilgilendiren konuların görüşülmesi durumunda müşteri ziyaret raporu, ziyareti gerçekleştirenler tarafından düzenlenerek Kalite Sistem Müdürlüğü bölümüne iletilir.

4.2.3. Müşteri ziyaret raporu Kalite Sistem Müdürlüğü tarafından incelenerek, gerekli görülen konular periyodik ilk toplantıda görüşe açılır. Yapılacak işlemler toplantı kararlarına göre takip edilir.

4.3. Müşteri iade talepleri

4.3.1. Müşteri iade talepleri Satış Müdürlüğü ve/veya Kalite Sistem Müdürlüğü bölümüne gelir. Maliyet/iadeye dönüşen şikayetler için 'Maliyet/Iadeye Dönüşen Şikayet Onaylama Akışı Destek Dokümanı'nda belirtilen adımlar izlenerek müşterinin iade istemi kabul veya red edilir.

4.3.2. Şikayet nakliye firması kaynaklı ise, yapılan hasar tespitleri Satış departmanı aracılığı ile muhasebeye iletilir. Onay geldiğinde Satış departmanı onaylı hasar bedelini Kalite ve Sevkiyat departmanlarına bildirir. Hasar bedeli olmayıp sadece uyarı yapılacak ise Sevkiyat departmanı tarafından nakliye firmasına yazılı olarak uyarıda bulunulur.

4.3.3. İade alınan ürünler, Kalite Sistem Müdürlüğü sorumluluğunda Hurda ve İadelerin değerlendirilmesi prosedürüne göre işlem görür.

4.4. Müşteri Memnuniyeti Anketi

4.4.1. Müşteri memnuniyeti anketi yılda 1 defa Kalite Sistem Müdürlüğü ve Satış Müdürlüğü tarafından Müşteri Memnuniyeti Ölçüm talimatına göre yapılır.

4.4.2. İç Piyasa müşteri memnuniyeti anketleri müşteri ziyaretleri ile yapılır. İhracat müşteri memnuniyeti anketleri ise soru listesi olarak müşteriye iletilir ve cevaplanması istenir. Salgın hastalık ve mücbir sebepler ile ziyaret yapılamayan müşterilere mail yolu ile anketler iletilir.

4.4.3. Alınan cevaplar Kalite Sistem Müdürlüğü tarafından değerlendirilerek rapor haline getirilir ve ilk Yönetimin Gözden Geçirmesi toplantısında gündem maddesi olarak raporlanır.

4.4.4. Yapılacak değerlendirme sonucunda memnuniyetin çok düşük olduğu konuların düzeltilmesi için gerekli işlemler başlatılır. İyileştirilmesi ve geliştirilmesi gereken konular için de gerekli faaliyetler belirlenerek toplantı kararlarında yer verilir.

4.4.5. Yapılan işlemler ve memnuniyetin gelişim durumu Kalite Sistem Müdürlüğü tarafından takip edilir.

4.5. Müşteri şikayetleri ve iadeleri ile ilgili işlemler için gereken tüm araştırma, inceleme, değerlendirme, yazışma ve sonuçlandırma işlemleri maksimum 1 hafta içerisinde tamamlanarak müşteriye dönülür.

4.6. Müşteri ilişkileri faaliyetlerine ait risk ve fırsatlar ilgili süreçlerde ele alınmıştır.

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		REVİZYON TARİHİ	20.01.2021
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5. REFERANS DOKÜMANLAR

KK-PR-006-HURDA VE İADELERİN DEĞERLENDİRİLMESİ PROSEDÜRÜ, MI-DD-001-MALİYET/İADEYE DÖNÜŞEN ŞİKAYET ONAYLAMA AKIŞI DESTEK DOKÜMANI, MI-FR-002-003-MÜŞTERİ ZİYARET RAPORU, MI-FR-002-006-MALİYET/İADEYE DÖNÜŞEN ŞİKAYET ONAYLAMA AKIŞ FORMU, MI-SY-TL-001-QDMS MÜŞTERİ ŞİKAYETLERİ MODÜLÜ TALİMATI, SG-MM-TL-001-MÜŞTERİ MEMNUNİYETİ ÖLÇÜM TALİMATI, SG-PR-001-DOKÜMAN VE VERİ KONTROL PROSEDÜRÜ, SG-PR-004-KAYITLARIN KONTROLÜ PROSEDÜRÜ

6. KAYITLAR

QDMS Dış Müşteri Şikayetleri Modülü
Müşteri Memnuniyet Anketleri
Müşteri Şikayetleri Toplantı Tutanakları
Müşteri Şikâyet Maliyet Tabloları

7. SORUMLULUKLAR

Genel Müdür: Yüksek maliyet/iadeye dönüşen şikayetlerin kabulünün onayının verilmesinden,

Mali İşlerden Sorumlu Genel Müdür Yardımcısı: Müşterinin zararı varsa karşılanması, üründe kalite düşürülmesi veya reklamasyon kabul kararının verilmesinden,

Fabrika Müdürü: Müşteri şikayetleri toplantısına katılım sağlanmasından,

İç Piyasa Satış Müdürü/ Dış Piyasa Satış Müdürü: Müşteri şikayetlerinin alınmasından, müşteri şikayetleri toplantılarına katılım sağlanmasından, müşteri memnuniyet anketlerinin yapılmasından, müşteri istek ve taleplerinin alınmasından ve müşteri iade taleplerinin onaylatılmasından,

İç Piyasa Müşteri Temsilcisi/Dış Piyasa Müşteri Temsilcisi: Müşteri şikayetlerinin alınmasından, QDMS Dış Müşteri Şikayetleri Modülüne girişinin yapılmasından, müşteri şikayetleri toplantılarına katılım sağlanmasından, inceleme/iyileştirme sonucunun müşteriye iletilmesinden, müşteri ziyaretlerinin gerçekleştirilmesinden, müşteri memnuniyet anketlerinin yapılmasından, müşteri istek ve taleplerinin alınmasından ve müşteri iade taleplerinin organizasyonunun yapılmasından,

Kalite Sistem Müdürü/Yöneticisi/Uzman Mühendisi/Mühendisi: Müşteri şikayetlerinin alınmasından, şikayetlerin ilgili bölümlere bildirimini sağlanmasından, şikayet ile ilgili gerek görüldüğü takdirde müşteri ziyaretlerinin yapılmasından, ziyaret raporu oluşturulmasından, şikayet cevaplarının müşteri temsilcisine iletilmesinden, aylık müşteri şikayetleri toplantılarının organize edilmesi ve yapılmasından, FSC ve PEFC ile ilgili alınan şikayetlerin inceleme sonucunu müşteriye ve belgelendirme firmasına iletmekten, müşteri memnuniyeti anketleri değerlendirme raporunun oluşturulup YGG'de değerlendirilmesinden ve iade alınan ürünlerin değerlendirilmesinden,

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Tuğba ÇAKMAKÇI Kalite Sistem Uzman Mühendisi	Emine İŞCAN TÜRKDEMİR Kalite Sistem Müdürü	Emine İŞCAN TÜRKDEMİR Kalite Sistem Müdürü	4/5

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PM İşletme Müdürü/Üretim Müdürü/Yöneticisi/Uzman Mühendisi/Mühendisi: Şikayetlerin incelenerek gerekli aksiyonların alınmasından, iade/maliyete dönüşen şikayetlerin kalite ve satış ile birlikte onaylanmasından, müşteri şikayet ziyaretlerine katılımı sağlamaktan ve müşteri şikayet toplantılarına katılmadan sorumludur.


KONTROLSUZ KOPYADIR...

Hazırlayan	Onaylayan	Kalite Sistem Onayı	Sayfa
Tuğba ÇAKMAKÇI Kalite Sistem Uzman Mühendisi	Emine İŞCAN TÜRKDEMİR Kalite Sistem Müdürü	Emine İŞCAN TÜRKDEMİR Kalite Sistem Müdürü	5/5

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Appendix H: Customer Complaints and Continuous Improvement Procedure of Modern Ambalaj

	MÜŞTERİ ŞİKAYETLERİ VE SÜREKLİ GELİŞİM PROSEDÜRÜ	Yayın Tarihi:	09.01.2017
		Doküman Kodu:	PR-KB-005
		Revizyon Tarihi/No:	26.02.2018/1

1. AMAÇ

Bu prosedürün amacı Modern Oluklu Mukavva Ambalaj San. ve Tic. A.Ş.'de müşteri şikayetlerinin alınması, ilgili bölümlere iletilmesi ve değerlendirilmesinin yapılması için yöntem, yetki, sorumlulukları belirlemektir.

2. KAPSAM

Bu prosedür, Modern Ambalajdaki her türlü müşteri şikayetini ve bu şikayetlerin değerlendirilmesi faaliyetlerini kapsar.

3. TANIMLAR

Müşteri Şikayeti: Tüketicinin ya da müşterinin olumsuz geri bildirimidir

4. İLGİLİ DOKÜMAN ve VERİLER

Kalite Excel Kayıtları Listesi
Performans Hedefleri Listesi
Uygun Olmayan Ürünün Kontrolü Prosedürü
Kalite Kayıtlarının Kontrolü Prosedürü

5. SORUMLULAR

Bu prosedürün uygulanmasından satış ve kalite departmanları başta olmak üzere tüm birimler sorumludur.

6. PROSEDÜRÜN UYGULANMASI

6.1. Şikayetin Alınması

Şikayetler sözlü veya yazılı olarak müşteri tarafından satış temsilcisine bildirilir. Şikayetler, kalite birimi tarafından incelendikten sonra gerekli görülen durumlarda satış birimine QDMS sistemi üzerinden DÖF açılır. Bu DÖF üzerinde müşteri, iş yeri, uygunsuzluk tanımı vb. detay bilgiler tanımlanır.

6.2. Şikayetin İncelenmesi


Şikayet konusu bir ürün kusuru ise kalite birimi ve satış temsilcisi problemi yerinde incelemek, tespit yapmak ve müşteriyi bilgilendirmek üzere müşteriyi ziyaret edilebileceği gibi, şikayetin konusuna göre fotoğraf ve hatalı ürün numunesi istenerek şahit numune ile kıyaslanarak şikayet değerlendirilebilir. Gıda güvenliği ile ilgili müşteri şikayetleri, HACCP ekip lideri tarafından incelenip ilgili bölümler ile birlikte şikayete yönelik en kısa sürede aksiyon alınması sağlanır ve HACCP toplantılarında gıda güvenliğine yönelik müşteri şikayetleri değerlendirilir. FSC kaynaklı müşteri şikayetleri, FSC Yönetim temsilcisi tarafından değerlendirilir. FSC sertifikalı ürün tedariki sağlanan müşterilerin, fatura ve taşıma dokümanlarıyla ilgili bir şikayet alınması durumunda, ürünle ilgili geriye dönük tüm kayıtlar incelenerek ürünün tüm üretim süreci FSC Yönetim Sistemine uygun bir şekilde gerçekleştirildi ise ilgili dokümanların tadil edilmesi teklif edilir.

6.3. Şikayetin Değerlendirilmesi

Uygunsuzluğun Modern Ambalaj'dan kaynaklandığının kabul edilmesi durumunda kalite şefi/yöneticisi ve satış temsilcisi malın değerlendirilebilmesi ya da kullanımının sağlanabilmesi için müşteriye alternatifler sunar. Müşteri sunulan alternatifleri uygun görürse mutabakat sağlanır. Müşteri ile mutabakat sağlanamaması durumunda malın iadesine kalite birimi tarafından karar verilir. Gerekliği takdirde fabrika müdüründen de onay alınabilir. Bundan sonraki işlemler Uygun Olmayan Ürünün Kontrolü Prosedürüne uygun olarak yapılır.

6.5. Şikayetin Cevaplandırılması

Hazırlayan	Kontrol Eden	Onaylayan
Kalite Uzmanı/Mühendisi	Yönetim Temsilcisi	GMY

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		Doküman Kodu:	PR-KB-005
		Revizyon Tarihi/No:	26.02.2018/1

Kalite birimi gerekli incelemeyi yaptıktan sonra, DÖF ilgili birime yönlendirilir. İletilen şikayetin alınmasına sebep olan bölüm şefliği/müdürlüğü hatanın tekrarlanmaması için yapacağı çalışmaları QDMS sistemi üzerinden tekrar kalite birimine iletir. Şikayetin çözümüne ilişkin cevabın takibini kalite birimi yapar. Şikayet cevaplama süresi, şikayete bağlı olarak değişebilir. Eğer müşterinin bu konuda belirttiği gün varsa bu süreye uygun olarak müşteriye dönüş yapılır.

6.6. Müşterinin Geri Bilgilendirilmesi

Müşterilerden bazıları, şikayet bildirimini kendi formatlarında yapıp bu formatta yanıt isteyebilirler. Bu durumda kalite birimi, QDMS sisteminin yanında müşteriden gelen tutanağı da doldurup satış birimi vasıtasıyla müşteriye iletir.

6.7. FSC Gereksinimlerini Karşılamayan Uygunsuz Mamül Şikayetleri

Kuruluş, şikayetlerin kuruluşun kapsam için geçerli olan gerekliliklere uygunluğunu kuruluşun CoC sertifikasının yeterince değerlendirildiğini, aşağıdakiler dahil:

- Şikayet alındıktan sonra en geç 2 hafta içinde şikayeti ileten müşteriye şikayetin alındığı ile ilgili bilgi verilir.
- Şikayet araştırıldıktan sonra önerilen aksiyonlar en geç üç ay içinde müşteriye bildirilir. Eğer, şikayetin araştırılması için daha fazla zamana ihtiyaç varsa, müşteri ve belgelendirme kuruluşuna bilgi verilir.
- Şikayete ilgili araştırma sonucu belgelendirme kuruluşu ve şikayet eden kuruluş aksiyonlarla ilgili bilgilendirilir.

6.8. Dönemsel Raporlar Ve Raporların Ele Alınması

Tüm müşteri şikayetleri, kalite excel kayıtları formu/QDMS sistemi üzerinden takip edilir. Performans kriterleri ve hedeflerin değerlendirilmesi amacıyla müşteri şikayetleri ilgili veriler Performans Kriterleri ve Hedefler Tablosunda belirtilerek aylık yapılan değerlendirme toplantısında değerlendirilir.

Yılda bir yapılan yönetim gözden geçirmesi toplantılarında müşteri şikayetleri üst yönetime raporlanır. Sonuçlar incelenir ve değerlendirilir.


6.9. Sürekli Gelişimin Sağlanması

6.9.1. Modern Oluklu Mukavva Ambalaj A.Ş. yönetim sisteminin sürekli gelişiminin sağlanması ve takibi için aşağıdaki süreçlerde toplanan veriler ana girdi sağlar.

Düzeltilici ve Önleyici Faaliyet sonuçlarının değerlendirilmesi,

- Müşteri şikayetleri,
- Eğitim kayıtları,
- Kalite kayıtları,
- Müşteri memnuniyeti ve personel memnuniyeti ölçüm sonuçları,
- Standart dışı (uygunsuz) ürünler ve hurda kayıtları,
- Üretim ve makine performansları,
- Satış-pazarlama verileri,
- Bakım kayıtları,
- Gıda güvenliğine ilişkin veriler,
- Satınalma performansını etkileyen veriler,

Hazırlayan	Kontrol Eden	Onaylayan
Kalite Uzmanı/Mühendisi	Yönetim Temsilcisi	GMY

	MÜŞTERİ ŞİKAYETLERİ VE SÜREKLİ GELİŞİM PROSEDÜRÜ	Yayın Tarihi:	09.01.2017
		Doküman Kodu:	PR-KB-005
		Revizyon Tarihi/No:	26.02.2018/1

- Lojistik kayıtları,

Konularından yola çıkarak modern ambalaj kalite politikası ve hedeflerine, stratejik iş planlarına paralel firma performans hedefleri üst yönetim tarafından belirlenir.

6.9.2.Tüm bölümleri ve süreçleri kapsayacak şekilde belirlenmiş olan firma performans hedeflerine yönelik veriler bölüm yöneticileri tarafından performans kriterleri ve hedefler tablosuna girilir. Kalite birimi tarafından da takibi sağlanır.

6.9.3.Geliştirilmesi gereken konularda kalite yönetim temsilcisi tarafından QDMS üzerinden düzeltici ve önleyici faaliyet başlatılır.

6.9.4.Firma Performans Hedeflerine ait gerçekleştirmeler yönetimin gözden geçirmesi toplantılarında incelenir. Hedeflerin yakalanmasına yönelik çalışmalar başlatılır. Hedeflerden sapmalar olduğunda önlemler alınır.

6.9.5.Bu prosedür kapsamında tutulan kayıtlar ve oluşturulan raporlar Kalite Kayıtlarının Kontrolü Prosedürüne göre saklanır.

7. DAĞITIM

Bu doküman QDMS üzerinden tüm birimlerin görebileceği şekilde paylaşımına açılmıştır.

KONTROLSUZ KOPYADIR

Hazırlayan	Kontrol Eden	Onaylayan
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