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FIRAT PLASTIC RUBBER INDUSTRY FIRAT Plastic Roof SPP Investment Project

Gender Equality Monitoring Report - 1



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Abbreviations

AFD	French Development Agency (Agence Française de Développement)
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESS	Environmental and Social Standard
ESP	Environmental and Social Policy
GEAP	Gender Equality Action Plan
GEMR	Gender Equality Monitoring Report
GMP	Grievance Mechanism Procedure
HR	Human Resources
IFC	International Finance Corporation
SPP	Solar Power Plant
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
Project	FIRAT Plastic Roof SPP Investment Project
PS	Performance Standard
SAS	Social Affairs Staff
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
TKYB	Development and Investment Bank of Türkiye / Türkiye Kalkınma ve Yatırım Bankası A.Ş.
The Project	FIRAT Plastic Roof SPP Investment Project



1 INTRODUCTION

This Gender Equality 1st Monitoring Report (“GEMR”) has been prepared to monitor gender equality activities carried out within the scope of FIRAT Plastic Roof SPP Investment Project. The report was created to assess the impact of the project on gender equality and to monitor the impact of the activities carried out in this direction.

The Gender Equality Action Plan (“GEAP”) has been developed within the framework of the project's national environmental legislation, Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy (“ESP”), International Finance Corporation (“IFC”) Performance Standards (PSs) and Agence Française de Development (“AFD”) Environmental and Social Framework (“ESFs”). This report includes monitoring and evaluation of the project in line with the Environmental and Social Action Plan (“ESAP”) and analyzes the contributions of relevant parties towards gender equality goals.

The project involves the expansion and modernization of FIRAT's existing operations and includes various action steps to achieve the targets set within the scope of gender equality. The Gender Equality Action Plan (GEAP) shared with TKYB and FIRAT Plastic Rubber Industry and Trade Inc. (FIRAT) on December 01, 2022.

This report addresses the monitoring of gender-focused activities, strengthening gender equality dynamics in the project and managing risks that may arise in this area. While the work to improve gender equality practices within the scope of the project is carried out by FIRAT, it is binding for all parties operating within the scope of the project, such as contractors, goods and service providers.

This report, which focuses on gender equality, is aligned with project management documents such as the Environmental and Social Management Plans, GEAP, Stakeholder Engagement Plan (“SEP”) and Grievance Mechanism Procedure (“GMP”), and has a cross-cutting and interactive structure with these documents.

1.1 Background and Project Description

Firat Plastic Rubber Industry and Trade Inc. (FIRAT), established in 1972 in Istanbul's Büyükdere District, operates a production complex on a 574,000 m² area, with 274,000 m² of closed space. FIRAT produces over 5000 plastic-based products used in sectors like construction, agriculture, medical, and white goods, and exports to more than 90 countries.



FIRAT is a global leader in the PVC Window and Door systems industry, manufacturing all elements, excluding glass and screws, within its own facilities. Key products include PVC profiles, EPDM and TPE gaskets, metal accessories, and various pipe systems. FIRAT products are quality-assured under its own approval system and serve the PVC window industry through brands such as Firatpen, Winhouse, and Gedizpen.

The proposed project involves the installation of solar panels on the roofs of 13 buildings, including masterbatch buildings and structures larger than 6000 m², aiming to generate 15,525,215.57 kWh of electricity annually with a power output of 12,000 kWp.

1.2 Purpose and Scope

The main objective of this report is to maximize the project's impact on gender equality and to monitor gender-focused activities throughout the project. In line with the indicators and criteria set out in the GEAP framework, the project's impact on women's employment, economic independence and participation in decision-making processes has been monitored and evaluated.

In this context, it is aimed to mainstream gender equality at all stages of the project and integrate it into the project in line with national and international development goals. In addition to managing adverse risks, GEAP aims to promote opportunities for gender equality, strengthen the dynamics of change and positively improve gender dynamics.

1.3 Definitions

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.

Stakeholder: All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

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.

Gender: A concept that encompasses the social roles, expectations, and norms influencing the behavior of individuals based on their gender within a society. Unlike biological gender,



which is grounded in physical characteristics, social gender is shaped by cultural, social, and psychological factors. It includes norms and expectations about how men and women should behave, covering aspects like roles, division of labor, and rights. Gender is closely linked to issues like gender equality and gender-based discrimination. The goal of the concept is to raise awareness, challenge stereotypes, and establish a fair gender dynamic in society.

Gender Equality: A principle aimed at the fair distribution of opportunities and responsibilities between women and men. It seeks to eliminate gender-based discrimination and stereotypes, ensuring that everyone has equal rights and opportunities. Gender equality not only advocates for women's rights but also encourages men to freely challenge gender-based expectations. The goal is to maximize the potential of individuals in a society and create a fair environment where everyone can thrive.

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

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.

Gender Pay Gap: The Gender pay gap is the difference between women's and men's average full-time equivalent earnings, expressed as a percentage of men's earnings. Gender pay gaps in favour of men are a common feature of economics worldwide.



1.4 Key Principles

During the implementation of this Plan, following principles will be followed to achieve an effective gender equality.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually 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 are considered in the manner of regional concerns and convenient resolution process will be taken.
- **Gender-focused Approach:** A perspective or methodology that places a central emphasis on gender considerations in analyzing, addressing, and designing policies, programs, or initiatives. It involves recognizing and understanding how gender roles, norms, and expectations influence individuals and communities.

Key aspects of a gender-focused approach include:

Analysis of Gender Dynamics: This involves examining the roles, responsibilities, and power dynamics between men and women in a given context. Understanding how social, cultural, and economic factors influence these dynamics is crucial.

Recognition of Gender Inequality: A gender-focused approach acknowledges existing gender inequalities and disparities. It aims to address and rectify these imbalances, promoting equal opportunities and rights for all genders.

Inclusion of Diverse Perspectives: It considers the diverse experiences and needs of different genders. This includes acknowledging that gender is not a binary concept and recognizing the experiences of non-binary, transgender, and gender-nonconforming individuals.

Promotion of Gender Equality: The ultimate goal of a gender-focused approach is to achieve gender equality by challenging and transforming discriminatory practices, policies, and attitudes. This includes ensuring equal access to resources, opportunities, and decision-making processes for all genders.



Integration into Policies and Programs: A gender-focused approach involves integrating gender considerations into the development, implementation, and evaluation of policies, programs, and projects across various sectors, such as education, health, economics, and governance.

Empowerment of All Genders: It seeks to empower individuals of all genders by dismantling barriers that limit their opportunities, choices, and participation in various aspects of life.

In summary, a gender-focused approach is a way of addressing issues through the lens of gender, recognizing the impact of societal expectations on individuals, and working towards a more equitable and inclusive society.

2 PROJECT STANDARDS

This GEMR is prepared based on national and international requirements and standards. During the lifetime of the FIRAT Plastic Roof SPP Investment Project, “Project Standards” will be followed which consist of:

- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- TKYB Environmental and Social Policy,
- applicable international standards and guidelines,
- International Finance Corporation (“IFC”) Performance Standards (“PS”s),
- French Development Agency (“AFD”) Environmental and Social Framework (“ESF”) & AFD Environmental and Social Complaints Mechanism Rules of Procedure.

3 SOCIAL GENDER AQUALITY ASSESSMENT

3.1 Organisational Capacity

During the monitoring period, the effectiveness of the roles and responsibilities defined under the GEAP was assessed as follows. In line with the Gender Equality Action Plan (GEAP), the units responsible for implementing gender equality actions in this project are Human Resources (HR) Unit Manager, Social Affairs Staff (SAS). These units are responsible for the implementation and supervision of the actions set out in the GEAP.

The assessment made during the monitoring period found that some roles were fulfilled, but others were not fully completed or implemented as planned. Human Resources (HR) Unit Management, The Social Affairs Staff (SAS) has responsibility for developing policies,



conducting training programs and establishing supportive mechanisms to promote gender equality.

For example, the Anti-Harassment, Anti-Violence and Anti-Discrimination Policy, which will fully meet the requirements on Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH), has yet to be finalized. Similarly, other important activities such as the provision of gender-sensitive complaint mechanisms and the implementation of SEA/SH trainings are still pending. These delays indicate that the responsible units need to step up their efforts to achieve the gender equality objectives of the project.

Going forward, it is critical that these roles and responsibilities are more rigorously implemented and monitored. HR Unit Management and SAS should take a more proactive role to address remaining gaps and take the necessary steps towards achieving gender equality targets. Progress in fulfilling these roles will be closely monitored in subsequent monitoring reports.

3.2 Monitoring and Reporting

In this monitoring report, the status of each target and outcome identified in the GEAP has been reviewed to assess whether these recommendations have been implemented. This review serves to track the integration of gender equality measures into the project and evaluate progress against the defined targets in GEAP developed for the Project.

This GEMR is required to be prepared annually and shared with the TKYB as per the article “Improving Gender Equality practices (including increasing women's employment rate) and preparing an annual Gender Equality Action Plan on this topic and sharing it with the TKYB”.

This report reflects the situation as of September 2024 and represents the first GEMR prepared according to ESAP. The next GEMR will be conducted in line with the next annual Environmental and Social Monitoring Report (ESMR) for the Project.

The GEAP for the FIRAT Plastic Roof SPP Investment Project (Project) should be updated every month according to the key monitoring activities specified in Section 5.4 of the GEAP.



4 METHODOLOGY

This section describes the methodology used in the monitoring and evaluation of the gender equality action plan. The methodology includes data collection methods, analysis processes and evaluation tools.

Data Collection

Field visits and research studies were conducted on September 19, 2024 to monitor and evaluate the gender equality action plan. The following activities were carried out as part of the fieldwork:

- In-depth Interviews and Meetings with FIRAT Project Management: The current status of gender equality policies and practices were discussed with project management.
- In-depth Interviews with Female and Male Employees: One-on-one interviews with 6 female and 7 male project employees were conducted to assess gender-based employment, working conditions and equal opportunities.
- In-depth Interviews with Mukhtars in Neighborhoods in the Project Impact Area: Interviews were conducted with mukhtars in neighborhoods adjacent to the project area to assess labor and employment policies.

Indicators

The key performance indicators identified to measure the achievement of the project's gender equality objectives are as follows:

- Expansion of HR policies (to include full consideration of SEA/SH)
- Establishing a gender-sensitive data collection and grievance system
- Increase in the proportion of female employees
- Participation in SEA/SH training programs and awareness raising activities on gender equality

Women's participation in decision-making processes These indicators were used as the basis for assessing the increase in female employees' labor force participation, the effectiveness of training activities (including SEA/SH-related trainings), the implementation of gender-sensitive grievance mechanisms, and women's experiences and inclusion in decision-making processes and workplace improvements during the project period.

Monitoring Process

Monitoring processes were managed in detail at each stage of the project. Progress on gender equality was monitored through field studies, interviews with the staff, and the data obtained



was reported. Although women's participation was limited, due diligence was carried out in light of the data obtained and the extent to which the project achieved its gender objectives was assessed. This report reflects the situation as of September 2024 and represents the first GEMR prepared according to ESAP. The next GEMR will be conducted in line with the next annual Environmental and Social Monitoring Report (ESMR) for the Project.

5 GENDER ASSESSMENT

This section presents the findings from the field visits on gender equality and the assessment of the current situation. The findings were analyzed in line with national legislation, IFC standards and project objectives, and a monitoring report was prepared with necessary improvements.

5.1 Assessment of Key Findings

5.1.1 Institutionalization and Capacity Building for Gender Equality

The company has taken various steps to institutionalize and effectively implement gender equality policies. Prominent among these steps is the opening of an assembly department that employs only women. Approximately 40 women work in this department and this initiative encourages women's participation in the workforce and increases visibility in terms of local employment and gender equality.

In addition, transportation services have been adjusted and additional shuttle stops have been added to improve the safety of women workers. These steps are considered important developments in terms of ensuring occupational safety and gender equality.

The Company states that there is no gender-based wage gap and that wages are determined according to the experience, job knowledge and duties of the employee. However, there is insufficient evidence that corporate documents or decision-making mechanisms are comprehensively reviewed with a gender perspective. This will require a more detailed review in the next monitoring report to assess whether gender equality policies have been fully implemented.

As part of gender awareness, the company organized various trainings in 2023 and 2024. However, it is unclear whether topics such as “unconscious bias” and “use of gender neutral language” were addressed. Expanding the scope of trainings is considered an important recommendation for future developments.



5.1.2 Recruitment

The company has taken some steps to promote gender equality in recruitment processes. For example, an assembly department was created where only female employees work. According to 2024 data, the total proportion of female employees is 6.41% and the proportion of female employees in income generating roles is 31%. Despite these positive developments, there is no evidence of the creation of gender-balanced hiring committees or the inclusion of anti-discrimination clauses in job advertisements.

The Company stated that there is no gender pay gap. This is a positive step towards gender equality. However, the lack of a formal mechanism to regularly monitor the pay gap may pose a risk to the sustainability of the pay balance. Therefore, regular and systematic monitoring of the wage gap will be an important element in achieving gender equality targets.

The rate of female representation in senior management is stated as 20%. Although this rate is above the sector average³⁴, further improvements are required to fully meet the targets set in the gender equality action plan.

5.1.3 Work-Life Balance

The Company has made some arrangements to support female employees. These include the establishment of a female-only assembly department and the addition of additional shuttle stops to ensure safe transportation for female employees. However, more comprehensive mechanisms to ensure work-life balance, such as parental leave policies and flexible working arrangements, have not yet been fully institutionalized.

The company provides interest-free advance support for employees. This special advance support provides financial support, with particular priority given to widows and female employees with children. In addition, there are supportive projects to provide internship opportunities for high school and university-age girls and to provide books to employees' children preparing for university exams.

While gender trainings have been organized, there is a lack of targeted training on work-life balance, for example on the use of paternity leave or returning to work after maternity leave.

³ According to the ILO's 2020 report, the rate of women managers in the industrial sector worldwide is around 10-15%. (<https://ilostat.ilo.org/topics/women/>)

⁴ In Turkey, the rate of women among senior managers is generally around 16% (chrome-extension://efaidnbmninnbpcapjcgclcfndmkaj/https://www.tuik.gov.tr/media/announcements/toplumsal_cinsiyet_istatistikleri.pdf)



5.1.4 Decision-Making and Leadership

The rate of female representation at the company's management level is stated as 20%. While this is a positive indicator in the industrial sector, it is observed that specific and measurable targets to increase the proportion of women in leadership positions are missing. There is also a lack of information on the integration of gender equality principles into decision-making processes and the provision of gender-sensitive leadership training.

Practices such as assembly lines and financial support for female employees are positive. However, more action is needed to increase gender inclusiveness in decision-making processes. Establishing formal gender equality guidelines to guide these processes will support future improvements.

5.1.5 Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)

Although the company's gender equality action plan includes a comprehensive plan on measures and awareness-raising steps to be taken on sexual abuse, exploitation and sexual harassment (SEA/SH), no concrete progress has been made in this area. The Company's initiatives to promote gender equality, such as increasing women's employment, organizing awareness raising trainings and supportive projects, are considered as positive steps. However, no sufficient information has been shared regarding the establishment of a direct mechanism to combat sexual harassment and violence or the implementation of awareness raising trainings.

In particular, it has been observed that the infrastructure for employees to access a safe and confidential complaint mechanism for sexual harassment and violence has not yet been established and the disciplinary board has not been updated on SEA/SH related issues. Despite the fact that 6.41% of the Company's employees are women, the lack of SEA/SH mechanisms indicates that the level of protection of employees is not sufficient.

In interviews with female employees, it was stated that they have not witnessed any sexual harassment or violence, that such an incident has never happened to them and that they feel safe at work. This finding suggests that there have been no incidents of sexual harassment and abuse, but this does not change the fact that the company needs to take more active measures on SEA/SH.

It is crucial that the company accelerates its initiatives on SEA/SH, organizing online training programs for all employees and managers, strengthening grievance mechanisms with a gender equality perspective and making these mechanisms visible on all platforms. In addition, making the functioning of ethics committees more effective and raising employee awareness on this issue will contribute to achieving the company's strategic goals in SEA/SH.



5.1.6 Grievance Redress Mechanisms

The company has established various channels (telephone, e-mail, complaint forms, etc.) for people to report their grievances and allows for anonymous reporting. However, existing mechanisms have not been updated to cover gender-based violence, harassment or discrimination.

In order to meet GEAP targets, the company needs to gender-sensitize its grievance mechanisms and organize targeted SEA/SH focused trainings for all employees. It will also be important to make grievance procedures more visible and accessible.

5.2 Status Assessment of GEAP Targets

Target 1: Important steps have been taken, such as a female assembly line and service safety regulations. However, further efforts are needed, such as institutionalization of policies and active participation in gender networks.

Target 2: Progress has been made in recruitment processes that promote gender equality, but more structural reforms are needed, such as the establishment of gender-balanced recruitment committees and the inclusion of anti-discrimination clauses in job advertisements.

Target 3: While some measures have been taken on work-life balance, formal mechanisms such as parental leave and work-life balance workshops need to be established. An assembly department for women workers and safe transportation services are important steps, but more supportive mechanisms are needed.

Target 4: Female representation in management has increased, but clearer targets and leadership training programs need to be developed.

Target 5: No significant progress has yet been made in developing mechanisms related to SEA/SH. The company needs to take urgent steps in this regard and provide confidential reporting systems and awareness raising trainings.

Target 6: The company's existing grievance mechanisms do not fully incorporate a gender perspective. Grievance mechanisms need to be gender-sensitized and confidential and secure mechanisms need to be established to support employees in filing complaints of sexual harassment, abuse and discrimination. It is also crucial to make grievance procedures more visible and accessible to employees.



6 GEAP COMPLIANCE ASSESSMENT

GEAP compliance assessment is performed in accordance with defined scores and criteria. Those score and indicator definitions are given in Table 6-1. The GEAP compliance assessment of the Project is performed, and the details are given in Table 6-2.

Table 6-1 Scores and Indicators

Score	Explanation
EC	Exceeding Compliance: The project has gone beyond the expectations of IFC PSs requirements. Lenders should be able to use projects rated EC as a role model for positive Environmental and Social effects.
FC	Fully Compliant: The project is fully in compliance with IFC PSs requirements, and EU and local environmental, health and safety policies and guidelines.
PC	Partial Compliance: The project is not in full compliance with IFC PS requirements, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.
MN	Material Non-compliance: The project is not in material compliance with IFC PS requirements, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.
N/A	Not Applicable: The action is not applicable for the project.



Table 6-2 GEAP Compliance Status

Gender Equality Action Plan (target and activities)	Progress to Date	Suggestion/ Action	Status	Score
Target 1: Institutionalization and Capacity Building for Gender Equality	A women-only assembly line was created; transport services were made safer. However, gender equality policies are not fully institutionalized in all units.	Gender equality policies should be applied in all units, systematic data collection, and participation in gender equality networks should be improved.	<ul style="list-style-type: none"> - Progress in specific areas (women-only assembly line, safer transport). - No full institutionalization of gender equality policies. - No systematic data collection yet. 	PC
Target 2: Recruitment	Female employees increased to 6.41%; a women-only assembly line was created. But gender-balanced recruitment committees and anti-discrimination clauses in job ads are not yet applied.	Gender-balanced recruitment committees should be established, and anti-discrimination clauses should be added to job ads.	<ul style="list-style-type: none"> - Increase in female workforce. - Gender-balanced recruitment processes not fully implemented. - No anti-discrimination clauses in job ads. 	PC



Gender Equality Action Plan (target and activities)	Progress to Date	Suggestion/ Action	Status	Score
Target 3: Work-Life Balance	Women-only assembly line and safer transport services were provided. However, policies on parental leave and work-life balance are not fully implemented.	Parental leave policies and work-life balance workshops should be introduced.	<ul style="list-style-type: none"> - Support for women (assembly line, safer transport). - No parental leave or formal work-life balance mechanisms yet. - Work-life balance support needs improvement. 	PC
Target 4: Decision-Making and Leadership	Female representation in senior management reached 20%, but specific targets and leadership training are missing.	Set clear goals to increase women in management and provide gender-sensitive leadership training.	<ul style="list-style-type: none"> - Female representation in management improved. - No specific goals for leadership diversity. - No gender-sensitive leadership training. 	PC
Target 5: Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)	No specific SEA/SH mechanisms were developed, and training or awareness programs are missing.	Establish confidential complaint systems for SEA/SH and implement awareness training.	<ul style="list-style-type: none"> - No SEA/SH mechanisms in place. - No awareness training or confidential reporting 	



Gender Equality Action Plan (target and activities)	Progress to Date	Suggestion/ Action	Status	Score
			systems. - Urgent need for SEA/SH systems and education.	MN
Target 6: Grievance Redress Mechanism	Grievance channels exist, but they are not gender-sensitive, and no confidential reporting systems are in place.	Update grievance mechanisms to be gender-sensitive and provide SEA/SH training.	- General grievance channels available. - No gender-sensitive systems or confidential reporting. - Requires immediate improvement in grievance mechanisms.	MN



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