# Project Notos Enerjisa Generation Non-Technical Summary



April 2023

Non-Technical Summary April 2023

## 1. What is this document?

This Non-Technical Summary (NTS) document provides an overview of the proposed wind power plant developments based on the proceeds of financing loan to Enerjisa Uretim Santralleri A.S. (Enerjisa Generation). A summary of relevant potential environmental and social issues and impacts are provided related to the construction and operation of the proposed developments and the existing diversified portfolio consisting of hydropower, wind, solar and natural gas power plants that is presently at a total installed capacity of 3,727 MW. Appropriate measures to mitigate the key adverse environmental and social impacts that may arise during the construction and operation of the Enerjisa power generation activities are also presented within this document.

## 2. The Project Summary

The Project with Energisa Generation in Turkey is a bank loan (up to 150 m USD/Euro) by the European Bank for Reconstruction and Development (EBRD) that will be used for the financing of the following:

- Acquisition of Akres WPP in Manisa (55 MW)
- Four small WPP extensions with 51.6 MWe installed capacity:
  - 23.6 MW extension to the existing 65 MW Erciyes WPP (4 turbines)
  - 7 MW extension to the Akhisar WPP (1 turbine)
  - 7 MW extension to 143 MW Balikesir WPP (1 turbine)
  - 14 MW extension to 39 MW Dagpazari WPP (2 turbines)

Enerjisa Enerji Üretim A.Ş. is operating on electricity generation under the roof of Enerjisa Üretim Santralleri A.Ş., which is a joint venture between E.ON (European holding company based in Essen, North Rhine-Westphalia, Germany and one of the largest private electricity and natural gas companies of the world) and Sabanci Holding, Turkey. Enerjisa Enerji Üretim A.Ş. is one of the first private energy providers in Turkey and has become a leader in the market with its diversified portfolio consisting of hydropower, wind, solar and natural gas power plants with a total installed capacity of 3,727 MW. The shareholding structure of the main company Enerjisa Üretim Santralleri A.Ş. is given in Figure 1. The key milestones in the history of Enerjisa are given in Figure 2.



Figure 1 Organizational Structure of the Main Company Enerjisa Üretim Santralleri A.Ş



Figure 2 Key Milestones in the History of Enerjisa

Enerjisa owns 23 power plants in 5 different types as follows:

- 12 Hydro Electrical Power Plants (HEPP) + 1 small HEPP within Bandırma I NGCCPP 1,353 MW in total
- 5 Wind Power Plants (WPP) 332 MW in total
- 2 Solar Power Plants (SPP) 9 MW in total
- 2 Natural Gas Combined Cycle Power Plants (NGCCPP) 1,543 MW in total
- 1 Natural Gas Power Plant 40 MW (currently not operational due to commercial reasons)
- 1 Lignite Thermal Power Plant (TPP) 450 MW

The power plants are listed in Table 1. The operational progress over the years is shown in

*Figure 3*. The power plants are illustrated in **Figure 4**. The turbine layout of the Akhisar WPP and other WPPs to which extensions will be made is shown in **Figure 5**.

Power Plant Name	Location	Commercial Operation Date	Financed by IFIs*	Total Capacity (MW)	Number of Units	Unit Capacity
Hydroelectric Power Plants						
Seyhan Basin						
Yamanlı II	Adana	19.02.2015	IFC	81.85	5	2*23.814 + 11.781+11.22
Menge HEPP	Adana	27.01.2012	IFC, EIB	89.42	2	44.71
Kuşaklı HEPP	Adana	20.09.2013	IFC, EIB	20	2	10
Köprü HEPP	Adana	26.04.2013	IFC, EIB	155.85	2	77.925
Kavşak Bendi HEPP	Adana	17.06.2014	IFC, EIB	191.28	3 + 1 EF	(3*61.95) + 5,43 EF
Doğançay HEPP	Adana	03.04.2017	IFC	61.95	2	30.975
Ceyhan Basin						
Hacınınoğlu HEPP	Kahramanmaraş	17.03.2011	IFC, EIB	142.28	2	71.14
Sarıgüzel Dam and HEPP	Kahramanmaraş	14.12.2013	IFC, EIB	102.54	2 + 1 EF	(2*49.44) + 3.66 EF
Dağdelen HEPP	Kahramanmaraş	11.05.2013	IFC, EIB	8	2	4
Kandil HEPP	Kahramanmaraş	24.01.2014	IFC, EIB	207.92	2 + 1 EF	(2*101.6) + 4.72 EF
Kuzey Basin						
Çambaşı HEPP	Trabzon	20.12.2013	IFC, EIB	44.1	2	22.05
Arkun Dam and HEPP	Artvin	12.06.2014	-	244.83	3 + 2 EF	(3*78.005) + (2*5.4) EF
Wind Power Plants						
Balıkesir WPP	Balıkesir	27.02.2013	EBRD	143	52	2.75
Çanakkale WPP	Çanakkale	06.05.2011	IFC, EIB	29.9	13	2.3
Dağpazarı WPP	Mersin	01.06.2012	IFC	39	13	3
Erciyes WPP	Kayseri	21.11.2022	HSBC	65	12	5.4
Akhisar WPP	Manisa	2011	-	55	22	2.5
Solar Power Plants						
Karabük SPP	Karabük	14.09.2017	-	7		
Bandırma SPP	Balıkesir	21.08.2017	-	2		
Natural Gas Power Plants						
Kentsa NGPP	Kocaeli	10.10.1997	-	40		
Bandırma 1 NGCCPP	Balıkesir	07.10.2010	IFC, EIB	936.18	2 GT + 1 BT	327,6 BT + (2*304.29) GT
Bandırma 2 NGCCPP	Balıkesir	01.05.2016	IFC	607.2	1  GT + 1  BT	401.6 GT + 205.6 BT
Lignite Power Plant						
Tufanbeyli LPP	Adana	25.03.2016	-	450	3	150

Table 1 Enerjisa Power Plants

*EF: Ecological Flow.* In addition to the HEPP facilities listed above, a 3-MW capacity HEPP started operation in 2014 at Bandırma I NGCCPP in order to utilize the energy released from the return of sea water used for cooling the steam in the electricity generation process. The energy generated at the HEPP was used for Bandırma power plant's internal consumption.

\* IFI: International Financial Institution



Figure 3 Operational Performance of Energisa Power Plants



Figure 4 Locations of Enerjisa Power Plants



Figure 5 The turbine layout of the Akhisar, Erciyes, Bakıkesir and Dağpazarı WPPs (green pins indicate the extension turbines)

6

Project Notos Enerjisa Generation

Non-Technical Summary April 2023 Energisa Üretim is currently developing a net-zero transition plan and pledging to be entirely net-zero carbon by 2045 at the latest. The Company aims to break even on carbon by 2035, meaning that emissions prevented by its renewable energy generation output will become comparable to the Company's total emissions. Based on the tentative roadmap, the emission intensities will be reduced below 425 g/Kwh in 2023, 415 g/KWh in 2025, 378 g/KWh in 2030 and 304 g/KWh in 2035 and 256 g/KWh in 2040. By 2023 installation of hybrid solar power plants will be completed, with additional plants planned. Further renewable energy facilities are in the planning phase. Between 2035 - 2040, the fossil fuel plants will be gradually decommissioned. Ultimately, in 2045, the target year for net zero emissions, the entire energy production of Energia Üretim will be supplied through renewable resources.

## 3. Project Finance

The existing diversified portfolio consists of hydropower, wind, solar and natural gas power plants with a total installed capacity of 3,727 MW. The Project bank loan (up to 150 m USD/Euro) will finance up to 158.2 MW of renewable energy.

## 4. What Environmental and Social Studies Have Been Undertaken?

The Environmental Impact Assessment (EIA) of Energisa facilities was conducted in line with the Turkish EIA Regulation. According to the Environmental Impact Assessment Regulation (Official Gazette Date/Number: 29.07.2022/31907), wind power plants of any size are listed in Annex-1 of the regulation, which requires the undertaking of an EIA process including a public consultation meeting. The EIA Regulation classifies projects into two annexes (Annex I and Annex II) based on the potential environmental impacts considering the Project's type, capacity, or location. Projects listed in Annex I are subject to a comprehensive EIA process. In contrast, projects listed in Annex II are subject to selection-elimination criteria and are required to prepare a Project Description Document (PDD). Related to Akhisar WPP (i.e., acquisition of Akhisar WPP to be financed by EBRD), Project DD reports were prepared in 2005 and 2013 for a 45 MW capacity with 18 turbines and 10 MW capacity increase with four turbines, respectively. The categorization of WPP projects was different at the time of assessments conducted for Akhisar WPP (i.e., Annex-2 Project subject to screening-elimination criteria), which required a limited assessment. Related to planned WPP capacity expansions, the EIA process for 7 MW extension to Akhisar WPP is ongoing based on the Turkish EIA Regulation. For the other WPP extensions, the previously obtained EIA decisions are considered valid by the MEUCC with the justification that the initial EIA decisions given for those WPPs were obtained for a higher number of turbines. Still, revisions were made within time to lower the number of turbines. The new extensions will be installed within the same WPP boundary and will not exceed the number of turbines initially assessed within the EIA studies.

The EBRD commissioned a third-party Environmental and Social Due Diligence (ESDD) for the Project. The scope of the work included i) a Desktop assessment of the Corporate E&S management system and resources ii) assess identification and management of E&S risks/impacts associated with sub-projects that will be financed by the Bank in line with policies and iii) a due diligence on Company's supply chain management system including a review of their current supply chain policy, Supplier code of conduct and monitoring and reporting requirements for solar and wind suppliers with a specific focus on forced labour risks in solar supply chain. The Project has been designated as a Category B project by the EBRD's 2019 Environmental and Social Policy as the potential E&S impacts associated with the Project are assessed to be limited and can be readily addressed and managed through the implementation of the Environmental and Social Action Plan (ESAP). The potential environmental and social impacts/risks will be mitigated through careful design and implementation of effective measures Project Notos Enerjisa Generation Non-Technical Summary 7

for a wide range of topics, including biodiversity and supply chain. Professional bird monitoring during the operation will be used to develop mitigation measures as needed to preserve the biodiversity including flora and fauna specifically for species of key interest. Developing a robust supply chain management system will allow the identification and management of supply chain risks. The potential environmental and social impacts are generally site-specific and can be avoided or mitigated by adhering to relevant Lenders' performance requirements, procedures, guidelines, and design criteria.

## 5. Scope of the Environmental and Social Due Diligence

The scope of work for the ESDD comprised of the following:

- Desktop assessment of the Corporate E&S management system and resources. This will include a review and capacity of the Company to undertake future Environmental and Social Governance (ESG) reporting in line with the EU CSRD as published on 16 December 2022.
- Assess identification and management of E&S risks/impacts associated with sub-projects that the Bank will finance in line with Bank PRs
- A due diligence on Company's supply chain management system, including review of their current supply chain policy, Supplier code of conduct and monitoring and reporting requirements for solar and wind suppliers with a specific focus on forced labour risks in solar supply chain.
- Benchmark the Client's current E&S management systems, operations, and assets/facilities against the EBRD PRs;
- Identify if additional studies will be required to cover relevant aspects in greater detail (e.g., biodiversity, land acquisition, livelihood restoration plan, retrenchment/demobilization plan, contractor control management plan, etc.)

The work included interviews with management and workforce, a review of available environmental and social documents, a detailed environmental and social management review and analysis, and a site visit for the Project about national regulatory requirements and relevant international standards. The ESDD was conducted with environmental, social, health and safety, labour and supply chain experts.

## 6. What are the key environmental and social impacts of the Project and the proposed mitigation measures?

The Project's main benefit will be the development of the renewable energy capacity of Enerjisa, which will support the net-zero transition plan and pledge to be entirely net-zero carbon by the year 2045 at the latest. Another significant benefit will be developing a robust supply chain management system that will identify and manage the supply chain risks. On the other hand, the Project can potentially negatively impact the environment and people if not managed carefully. The ESDD has identified all potential environmental and social impacts associated with the construction and operation phase of the Project and appropriate mitigation measures.

Enerjisa has established integrated Quality, Health and Safety, Environment and Energy management systems and hold the relevant certifications covering Headquarters and all power plants except Karabük SPP, Bandırma SPP, Kentsa NGCCPP, Erciyes WPP and Akhisar WPP. Enerjisa has been a signatory of UN Global Compact since 02.08.2022 and Women's Empowerment Principles (WEP) since 20.04.2022. Enerjisa has also been a member of the Business Council for Sustainable Development Türkiye since 11.01.2022. Enerjisa has a Procurement Procedure in place that describes the principles

for the procurement of all kinds of goods/materials and services. The Procurement Procedure requires the consideration of OHS and environmental issues during the selection of suppliers/contractors and the suppliers/contractors are required to follow OHS and environmental regulatory requirements and Energisa Management System rules.

The following conditions were identified

- The need to strengthen the Asset Management and Sustainability Department organizational structure.
- The development of the existing corporate Social Management Procedure and into a Social Management System
- Supplier and contractor management to be in line with EBRD PR2.
- Lack of Supply Chain Management System that include at a minimum:
  - a strong company, supply chain policy and a management system
  - an Internal Management System to support supply chain due diligence.
  - a good risk management system, including understanding, identifying, and assessing.
  - o a system to review supplier capacity to manage labour risks.
  - design and implement strategy to respond to identified risk.
- Lack of a gap analysis and/or Environmental and Social Impact Assessment (ESIA) in accordance with the EBRD PRs for future projects. Lack of an Environmental and Social Due Diligence Procedure related to potential acquisitions of projects.
- Need to complete the existing roadmap to decarbonization for implementing the strategy and finalize decarbonisation strategy.
- Requirement for a more robust and detailed biodiversity assessment, monitoring for the WPPs and related development of mitigation measures.
- Lack of Community Health and Safety plans for each facility that will incorporate the Project related risks and adverse impacts on the health and safety of the potentially project-affected communities. (ESAP Action 4.5)
- Need to review all infrastructure safety and emergency response plans for earthquake risks for facilities based on the lessons learned from the 06.02.2023 Kahramanmaraş Earthquake
- Assurance that construction workers in particular related to proposed extension projects to ensure compliance with the Labor Law and ILO principles, as applicable.
- Need to Revise the employment contracts to be in line with regulations and EBRD PR2 standards.
- Significant improvements are to be made in HR and other policies and practices in line with the development and implementation of an Equal Opportunities Action Plan and join an externally verified national equal opportunities accreditation scheme.
- Requirement for a dedicated GBVH policy and cascade these down to all plants and operations.
- Improve the Land Acquisition Procedure to cover the aspects covered under the land acquisition and compensation section of the Social Management Procedure by also taking into account EBRD PR5 requirements.

The key potential environmental and social impacts and mitigation measures are presented in Table 2. If you need further information, please contact the project team through the contact details provided at the end of this NTS.

Impact Topic	Potential Impact / Source		Proposed Remedial Measures	
	Source	Significance		
Environmental and Social Assessment	No existing procedure that outlines due diligence requirements for future developments and investments, particularly related to potential acquisitions.	High	<ul> <li>Related to future projects, undertake a gap analysis and/or Environmental and Social Impact Assessment (ESIA) following the EBRD PRs. Ensure that gap analysis/ESIA studies will cover the Project and all associated facilities.</li> <li>Related to potential acquisitions of projects developed by others, develop and implement an Environmental and Social Due Diligence Procedure to describe the due diligence process, categorise the Project, identify gaps between current project performance and the EBRD PRs and identify and conduct actions including additional studies to close any gaps in order to be in line with the EBRD PRs.</li> </ul>	
Environmental and Social Management Systems Environmental and Social Policy	Enhancement of existing integrated Quality, Health and Safety, Environment and Energy management systems	High	<ul> <li>Finalise the existing Corporate Social Policy, Social Management Procedure in line with EBRD requirements and integrate these into the Environmental and Social Management System (ESMS) that will be commensurate with the existing social risks.</li> <li>Enhance the existing Corporate Environmental and Social Management System (ESMS) and related management plans and procedures to integrate all E&amp;S requirements in line with EBRD's performance requirements.</li> <li>Adopt the Corporate Social Procedure to project sites based on site-specific risks and implemented on a systematic basis.</li> <li>Determine and adopt environmental and social (E&amp;S) targets and specific Environmental and Social Key Performance Indicators (KPIs) based on national and international good practice standards for the industry.</li> <li>Implement the substantive requirements of the EU Directives related to OHS and environmental&amp; social standards, as appropriate.</li> </ul>	

## Table 2 Potential Environmental & Social Impacts of the Project

Impact Topic         Potential Impact / Source			Proposed Remedial Measures	
	Source	Significance		
Organisational Capacity and Commitment	Lack of adequate personnel to conduct E&S safety at corporate and site level.	High	<ul> <li>Strengthen the Asset Management and Sustainability Department organisational structure through defining clear roles, responsibilities, and authority to implement the environmental and social safeguards,</li> <li>Allocate and maintain adequate E&amp;S resources at corporate level responsible for effective implementation and standardisation of corporate policies and ESMS at site operations, coordination of ESAP actions between the teams and reporting to the Bank.</li> <li>Appoint Community Liaison Officers (CLOs) at all project sites and supported by the Social Manager at Corporate level, with appropriate skills and experience to effectively manage the implementation of the social management plans,</li> <li>Train the CLOs on the Corporate Social Policy &amp; updated Social Management Procedure,</li> <li>Ensure a robust social monitoring and reporting mechanism is established for all sites to enhance monitoring&amp; reporting to the Corporate in a consistent manner.</li> </ul>	
Supply Chain Management	Further development of existing contractor and supply chain Management System	High	<ul> <li>Enhance the existing Contractor Management System:</li> <li>Develop and implement a Contractor Management Plan in line with the EBRD requirements,</li> <li>Review and update, as necessary, the Procurement Procedure and the Contractor Selection, Evaluation and Management Procedure to ensure that all EBRD PR requirements are covered appropriately, as necessary,</li> <li>Develop and implement a robust Supply Chain Management System (SCMS) for wind/solar projects to identify, manage and remediate supply chain risks associated with labour exploitation, as well as any other significant environmental and human rights risks and impacts to comply with the EBRD requirements</li> </ul>	

Impact Topic Potential Impact / Source			Proposed Remedial Measures	
	Source	Significance		
Human Resource Policies and Working Relationships	Clauses in the employment contracts, not in line with regulations and EBRD PR2 standards.	Medium	• Revise the employment contracts to be fully in line with regulations and EBRD PR2 standards.	
Non-Discrimination and Equal Opportunity	Lack of stand-alone gender policy, an inclusive gender- responsive workplace strategy, and a gender action plan (GAP) including a zero-tolerance policy against any form of discrimination, violence, and harassment policies special to the workplace and ensure everybody complies with this policy	High	<ul> <li>Develop and implement equal opportunities action plan, including clear targets for women and youth employment.</li> <li>Implement the Company's GBVH policy and cascade it down to all plants and operations of the Company.</li> <li>Ensure gender policy and GBVH requirements are embedded into all contracts and monitor effective implementation regularly.</li> <li>Conduct GBVH based risk assessment and determine company capacity and resources to address such risks.</li> <li>Train all contractors/sub-contractors and primary suppliers on GBVH policy requirements.</li> <li>Appoint and train the GBVH focal points to address GBVH issues at all sites.</li> <li>Establish a dedicated GBVH grievance mechanism.</li> <li>Keep the balanced GBHV grievance committee with diverse members, as well as divisions (e.g., legal, HR, operations)</li> <li>Establish GBVH awareness activities among affected communities where the risks are identified.</li> <li>Develop and adopt with complementary training, awareness-raising, and monitoring activities on gender-based violence and related company policies.</li> </ul>	
Wages, benefits, and conditions of work and accommodation	Overtime occurrence	Medium	<ul> <li>Review working hours (regular + overtime) and other aspects within seven daystime scales, maximum 7,5 hours night shift, at least one-day-off in a week, maximum 270 hours overtime per year, maximum 11 hours daily work incl. overtime to ensure compliance with national regulations and EBRD PR 2 standards, identify and correct any potential deficiencies.</li> <li>From the previous years to the workers in accordance with the national legislation.</li> </ul>	

Impact Topic	Potential Impact / Source		Proposed Remedial Measures	
	Source	Significance		
Grievance Mechanism	Enhancement of the existing grievance mechanism	Medium	• Develop the existing practices into a "formal employee grievance mechanism" and implement it for contractors and sub-contractor workers and provide them information on channels for internal communication and raising grievances at all sites.	
Noise	Lack of noise measurements	Medium	• Conduct noise measurements at the nearest receptors to the turbine extension locations when the WPPs are fully operational and not operating	
Water Rights	Revisions of Downstream Water Rights Report at HEPPs	Low	<ul> <li>Enerjisa to renew the Downstream Water Right Reports for those HEPP facilities whose period of validity has expired.</li> <li>For all HEPP facilities, Enerjisa to determine whether there are any water rights after tailrace and if any, to revise the relevant Downstream Water Rights Reports including Water Rights After Tailrace even if the period of validity has not expired and submit the reports to DSI for approval</li> </ul>	
Occupational Health and Safety	Enhancement of existing OHS plans	Medium	• Energisa reviews and align the existing OHS Plans in line with EBRD PR4 requirements including structural integrity and design safety risks to workers and communities	
Infrastructure, Building, and Equipment Design and Safety	Revisions to existing emergency response plans and infrastructure safety	High	<ul> <li>Revise Emergency Response Action Plans as needed to reflect the climate change conditions and integrate these plans with emergency management procedure.</li> <li>Review all infrastructure safety for earthquake risks for all power plants based on the lessons learned from the 06.02.2023 Kahramanmaraş Earthquake</li> <li>Follow the changes in government emergency preparedness procedures and legislation after 06.02.2023 Kahramanmaraş Earthquake and incorporate them into corporate plans and strategy.</li> <li>Assess the vulnerability of the Project to risks caused by climate change. This may require a re-assessment of flooding scenarios in the emergency action plans present for the HEPPs</li> </ul>	
Land Acquisition	Enhancement needs for existing Land Acquisition Procedure and	High	• Revise the existing Land Acquisition Procedure to cover the aspects under the land acquisition and compensation section of the Social Management Procedure by also taking into account EBRD PR5 requirements	

Impact Topic	Potential Impact / Source		Proposed Remedial Measures	
	Source	Significance		
	the Social Management Procedure			
Biodiversity windfarms	Lack of adequate biodiversity baseline and development of mitigation measures as necessary.	High	<ul> <li>Bird monitoring for Akhisar WPP, Balıkesir WPP and Çanakkale WPP, Erciyes WPP: Dağpazarı WPP</li> <li>If monitoring shows the presence of Egyptian vulture, to prevent possible collisions of Egyptian vulture, the Company will develop and implement a robust Shut-down procedure.</li> <li>Undertake flora and fauna surveys at Akhisar WPP, Erciyes WPP, Dagpazarı WPP, Balıkesir WPP in line with PR6.</li> <li>Fulfil the requirements as stated in the Follow-up and Control Reports of the inspection commission for Doğançay, Kavşakbendi, Kuşaklı, Menge and Yamanlı II HEPPs</li> </ul>	
Biodiversity HEPPs	Risk of minimal water flow requirements	Medium	<ul> <li>Maintain a minimal water flow on existing hydro projects for all to ensure that there is no net biodiversity loss and no negative impact on downstream water users.</li> <li>Disclose EFs for existing and future HEPP Projects following discussions with EBRD.</li> <li>Communicate with DSI as necessary to inform them about the changes in ecological flow rates compared to the permitted</li> </ul>	
Cultural Heritage	Adverse impact for existing cultural assets during construction and operation	Medium	<ul> <li>Of specific to WPP extension projects and for all future projects, Consult with all relevant stakeholders (including authorities and local communities, as appropriate) when assessing impacts on cultural heritage, and maintain records of consultation made for the WPP extension projects and for all future projects.</li> <li>Develop an Archaeological Chance Finds Procedure at the corporate level and revise the corporate level Archaeological Chance Finds Procedure to represent sitespecific conditions and implement it during construction</li> </ul>	
Employment	Creation of employment opportunities during the construction process Labour and working conditions	Medium	• Conduct regular quarterly independent employee standards audits for construction workers in particular related to proposed extension projects to ensure compliance with the Labour & OHS Laws and PR 2 requirements.	

Impact Topic	ct Topic Potential Impact / Source		Proposed Remedial Measures	
	Source	Significance		
			<ul> <li>Develop and implement equal opportunities action plan including clear targets for women and youth employment.</li> <li>Review working hours (regular + overtime) to ensure compliance with national regulations and EBRD PR 2 standards, identify and correct any potential deficiencies.</li> <li>Develop the existing practices into a "formal employee grievance mechanism" and implement it for contractors and sub-contractor workers and provide them information on channels for internal communication and raising grievances at all sites. The workers should be informed of the mechanism and procedures at the time of hire in their local language. Options of anonymous grievance mechanism should be established to encourage concerns to be raised freely as per PR 2 requirements.</li> </ul>	
Stakeholder and Information Disclosure	Lack of stakeholder engagement	High	<ul> <li>Implement the Corporate Level Stakeholder Engagement Plan (SEP) in line with EBRD PR 10 to cover all stakeholder engagement requirements as required by EBRD and formalize a systematic way to engage with stakeholders regularly</li> <li>Develop site-specific Stakeholder Engagement Plans (SEP) for each Project (at least for each major investment that has a significant impact).</li> <li>Monitor implementation of the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the Project's life cycle. Documentation of all stakeholder activities and logging of grievances should be recorded to inform the annual monitoring report. The SEP should be reviewed and if necessary, updated annually or when changes occur in the Project.</li> <li>Appoint Community Liaison Officers (CLOs) and supported by the Social Manager at Corporate level and as needed on a regional and Project basis, with appropriate skills and experience to effectively manage the implementation of the social management plans, Stakeholder Engagement Plan (SEP)</li> </ul>	

## 7. How will Energisa communicate and engage with stakeholders?

Energisa considers stakeholder engagement (including dialogue, consultation, and the disclosure of information) to be a key element of Project planning, development, and implementation and are committed to a transparent and respectful dialogue with stakeholders.

Energisa mapped out the potential stakeholders and their interests and developed a Stakeholder Engagement Plan. This will ensure regular engagement with the affected people and vulnerable people, wider communities, local/national government, and non-governmental organizations, and media to inform them about project activities, plans and developments on an ongoing basis, and gather any complaints or feedback.

## 8. How can stakeholders make a request, complaint or inquire?

Enerjisa has a Grievance Mechanisms, which provide a process for all people to easily convey their complaints and suggestions and allows the Project to respond to and appropriately resolve the issues. Grievance procedures allow people to raise anonymous complaints if they wish to.

You can raise requests, questions, feedback, and complaints through the contact details provided below.

The contact details for submitting grievances to Energisa are provided below:

## Enerjisa Üretim A.Ş.

BARBAROS MAH, MY OFFICE İŞ MERKEZİ ÇİĞDEM SOK. NO:1/16 34746 ATAŞEHİR/İSTANBUL

**Telephone (Customer Call Centre):** 

(0216) 512 40 00

E-mail: <u>kurumsal@enerjisauretim.com</u>

Website: <u>https://www.enerjisauretim.com.tr/hakkimizda/bizi-taniyin/bize-</u>ulasin