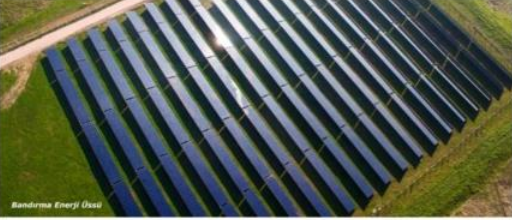


ENERJİSA ÜRETİM



Corporate Stakeholder Engagement Plan (SEP)

Enerjisa Production Inc.

May 2023

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1. INTRODUCTION

1.1 Overview

This Corporate Stakeholder Engagement Plan (SEP) provides a framework outlining the requirements and processes for stakeholder engagement and public consultation, stakeholder identification, and grievance mechanism planned by Enerjisa Üretim A.Ş. ("Enerjisa" or the "Company") at a corporate level.

European Bank for Reconstruction and Development (EBRD) will be providing a Loan (up to 150 m USD/Euro) to finance renewable projects consisting of wind power plants. EBRD requires the Company to comply with all Turkish laws and regulations and the EBRD performance requirements (PRs). The PRs call for the preparation of the following documents, along with the present Stakeholder Engagement Plan (SEP): a Project specific Non-Technical Summary (NTS) and an independent Environmental and Social Due Diligence (ESDD) process leading to an Environmental and Social Action Plan (ESAP), agreed with the Company. In line with EBRD PR 10, this SEP presents the Company's commitment and approach in terms of disclosure of Project information and engagement of Project stakeholders. This Corporate SEP conforms to the importance of an open and transparent engagement between the Company, its employees, local communities directly affected by the Company operations, and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship.

As the Company has a portfolio of hydropower, wind, solar, and natural gas power plants, each of its Production entities will develop a standalone SEP in line with the principles defined in this corporate SEP, including grievance mechanisms. This document is intended for public disclosure and will be made available in Turkish and English by Enerjisa.

In case of any queries, comments, or suggestions concerning this SEP or the Company's operations using the contact details are given below:

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1.2 SEP Objectives

Stakeholder engagement is an ongoing process, and as such, this SEP is a 'living document' that will be updated and adjusted as required. This SEP provides a framework for stakeholder engagement; it has been designed so Enerjisa can demonstrate effective, meaningful, consistent, comprehensive, coordinated, and culturally appropriate engagement in line with all the relevant legal and regulatory commitments and good international industry practices.

The primary objectives of Enerjisa for stakeholder engagement are as follows

- **Stakeholder Identification, Analysis, and Engagement Planning** Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder identification, analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, ongoing reporting to Affected Stakeholders.
- **Disclosure of Relevant Project Information** Information will be provided to stakeholders on relevant aspects of the Project: (i) the purpose, nature, scale, and duration of the project activities; (ii) risks to, and potential impacts on, stakeholders and proposed mitigation plans; (iii) the envisaged stakeholder engagement process, if any, and opportunities and ways in which the public can participate; and (iv) the process by which any grievances will be managed.
- **Meaningful Consultation** Consultation will be in line with the degree of impact of the Project and by legal requirements and will be: (i) inclusive and culturally appropriate; (ii) free of external manipulation, interference, coercion, or intimidation; (iii) depending on the nature and scale of the Project's potential adverse impacts on affected communities; (iv) begin early as possible and continue throughout the Project, as appropriate and (v) be documented, as necessary.
- **Informed Consultation and Participation** Disclosure and consultation requirements will be embedded into each stage of the Project development, leading to Enerjisa incorporating into its decision-making process the views of the affected parties on matters that affect them directly, such as proposed mitigation measures, the equitable sharing of benefits and opportunities from projects, and implementation issues. The process will be documented, particularly the actions to avoid or minimize risks and adverse impacts on the affected stakeholders. The stakeholders will be informed about how their concerns have been considered. In addition, the consultation process will meet any applicable requirements under national environmental impact assessment laws and other relevant legislation.
- **Engagement During Project Implementation and External Reporting** Enerjisa will provide information to identified stakeholders, on an ongoing basis, appropriate to the nature of the Project and its adverse environmental and social impacts and issues and the level of public interest throughout the life of the Project. In addition, Enerjisa will make publicly available periodic reports on their environmental and social sustainability.
- **Grievance Mechanism** Applying a grievance mechanism, process, or procedure to receive and facilitate the resolution of affected stakeholders' concerns and grievances about the Enerjisa environmental and social performance. The grievance mechanism will be scaled to the Project's risks and potential adverse impacts.
- **Ongoing Reporting to Affected Stakeholders** Provide periodic reports to the affected stakeholders that describe progress with the implementation of the project Action Plans on issues that involve ongoing risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism has identified as a concern to those stakeholders.

1.3 Company Profile

Enerjisa operates on electricity generation under the roof of Enerjisa Üretim Controller A.Ş., 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 Sabancı Holding, Turkey. Enerjisa is one of Turkey's first private energy providers 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 Enerjisa is given in Figure 1. The key milestones in the history of Enerjisa are shown in

Figure 2.

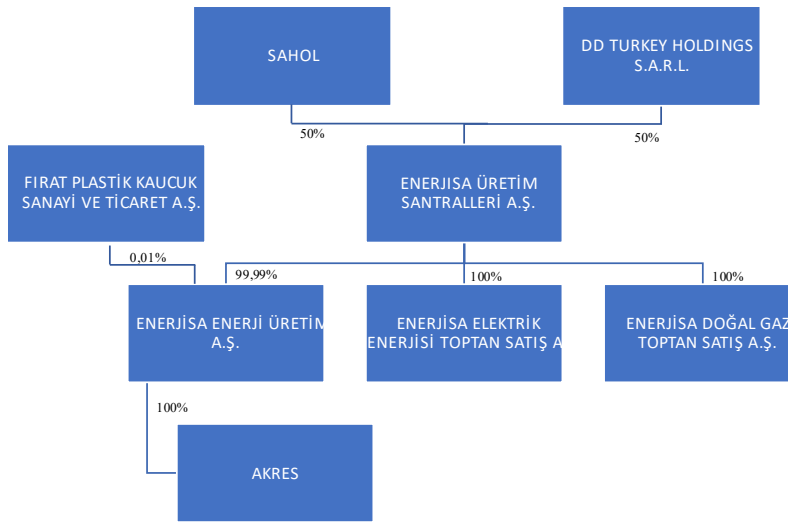


Figure 1 Organizational Structure of the Main Company Enerjisa Üretim Santralleri A.Ş

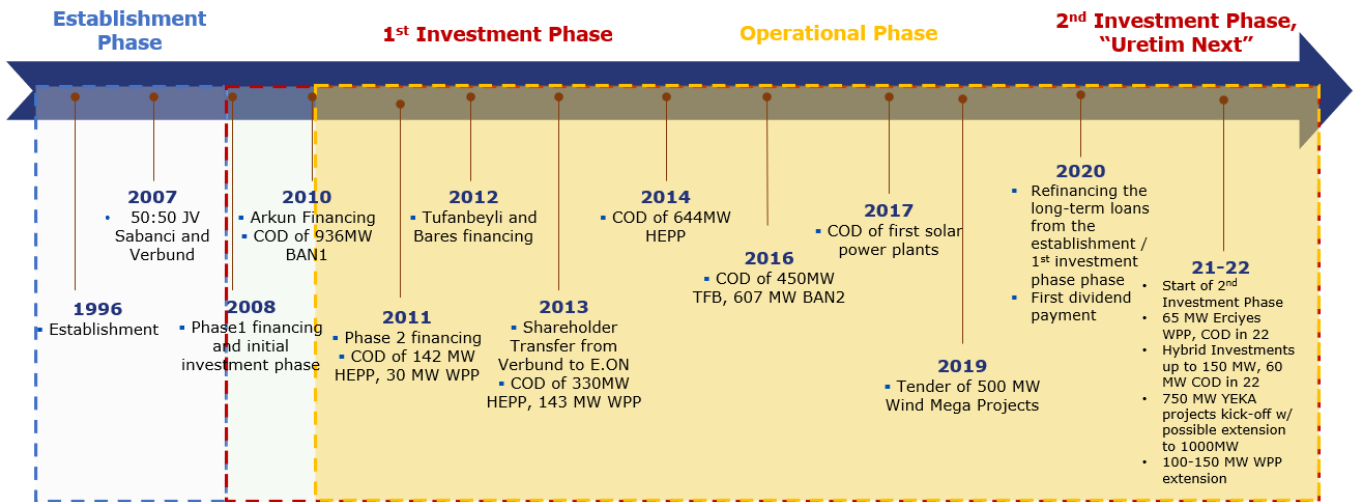


Figure 2 Key Milestones in the History of Enerjisa

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

- 12 Hydro Electrical Power Plants (HEPP) + 1 small HEPP within Bandırma I Natural Gas Combined Cycle Power Plants (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 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 power plants are illustrated in **Figure 3**.

Table 1 Enerjisa Power Plants

Power Plant Name	Location	Commercial Operation Date	Finan	Total Capacity (MW)	Number of Units	Unit Capacity
Hydroelectric Power Plants						
Seyhan Basin						
Yamanlı II	Adana	19.02.2015	IF	81.85	5	2*23.814 +
Menge HEPP	Adana	27.01.2012	IF	89.42	2	44.71
Kuşaklı HEPP	Adana	20.09.2013	IF	20	2	10
Köprü HEPP	Adana	26.04.2013	IF	155.85	2	77.925
Kavşak Bendi	Adana	17.06.2014	IF	191.28	3 + 1 EF	(3*61.95) + 5,43 EF
Doğançay HEPP	Adana	03.04.2017	IF	61.95	2	30.975
Ceyhan Basin						
Hacınoğlu HEPP	Kahramanm	17.03.2011	IF	142.28	2	71.14
Sarıgüzel Dam and	Kahramanm	14.12.2013	IF	102.54	2 + 1 EF	(2*49.44) + 3.66 EF
Dağdelen HEPP	Kahramanm	11.05.2013	IF	8	2	4
Kandil HEPP	Kahramanm	24.01.2014	IF	207.92	2 + 1 EF	(2*101.6) + 4.72 EF
Kuzey Basin						
Çambaşı HEPP	Trabzon	20.12.2013	IF	44.1	2	22.05
Arkun Dam and	Artvin	12.06.2014	-	244.83	3 + 2 EF	(3*78.005) + (2*5.4)
Wind Power Plants						
Balıkesir WPP	Balıkesir	27.02.2013	E	143	52	2.75
Çanakkale WPP	Çanakkale	06.05.2011	IF	29.9	13	2.3
Dağpazarı WPP	Mersin	01.06.2012	IF	39	13	3
Erciyes WPP	Kayseri	21.11.2022	H	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	Balıkesir	07.10.2010	IF	936.18	2 GT + 1 BT	327,6 BT +
Bandırma 2	Balıkesir	01.05.2016	IF	607.2	1 GT + 1 BT	401.6 GT + 205.6
Lignite Power Plant						
Tufanbeyli LPP	Adana	25.03.2016	-	450	3	150

EF: Ecological Flow. In addition to the HEPP facilities listed above, a 3-MW capacity HEPP started operation in 2014 at Bandırma I NGCCPP to utilize the energy released from the return of seawater used for cooling the steam in the electricity generation process.

The energy generated at the HEPP was used for the Bandırma power plant's internal consumption. * *IFI: International Financial Institution*

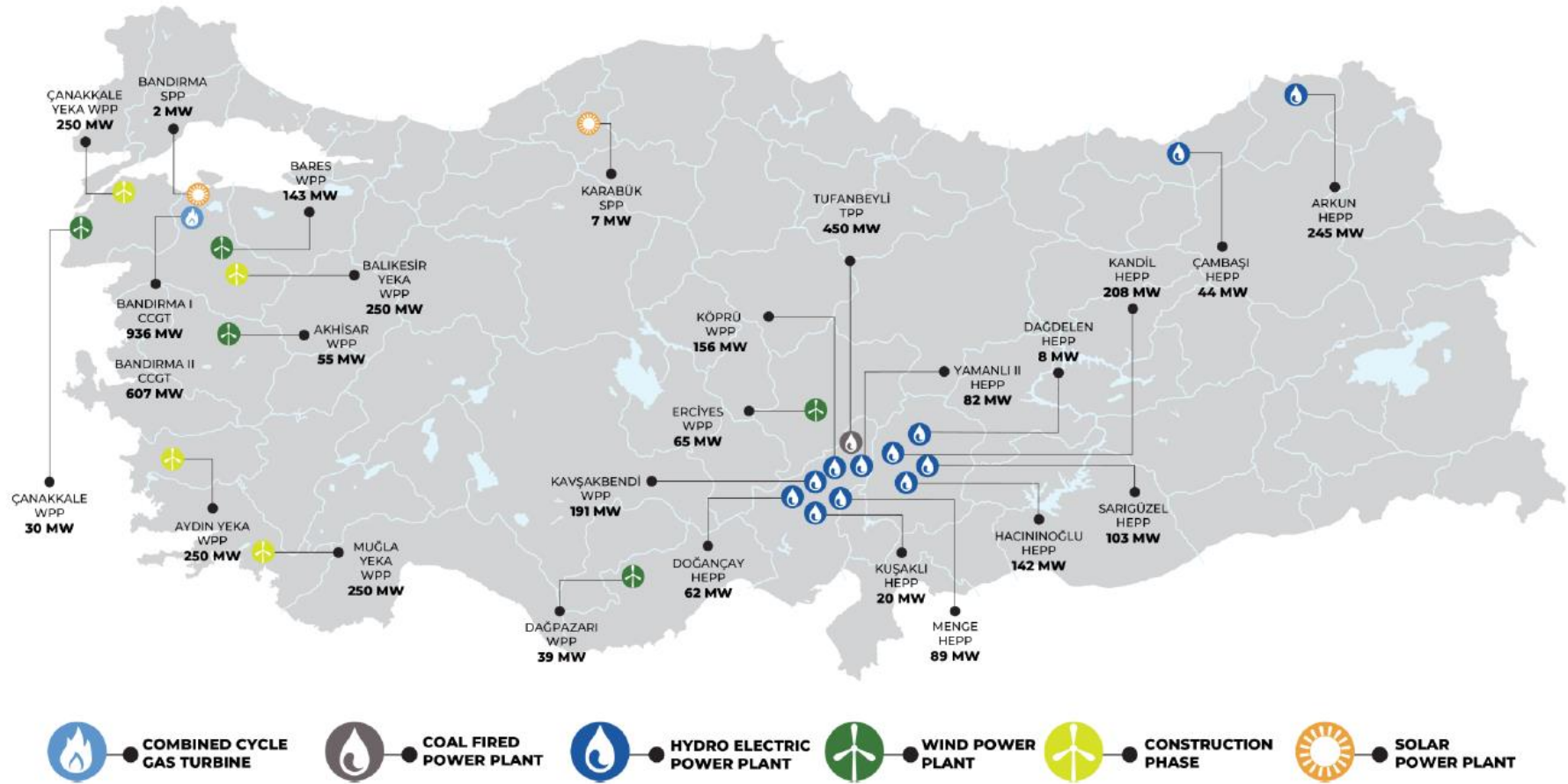


Figure 3 Locations of Enerjisa Power Plants

2. LEGISLATIVE BACKGROUND

This SEP follows the national legislation and international standards related to stakeholder engagement processes.

2.1 National Standards

Constitution of the Republic of Turkey

The Constitution of the Republic of Turkey is the fundamental document concerning the stakeholder engagement processes. The constitutional provisions concerning stakeholder participation/ engagement are as follows:

Freedom of thought and opinion (Article 25 of the Turkish Constitution): Everyone has freedom of thought and opinion. No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused because of his/her thoughts and opinions.

Freedom of expression and dissemination of thought (Article 26 of the Turkish Constitution)

Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing, in pictures, or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference from official authorities.

Right to petition (Article 74 of the Turkish Constitution)

Citizens and foreign residents in Turkey, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and the Grand National Assembly of Turkey about the requests and complaints concerning themselves or the public.

Law on the right to information

Law on the Right to Information No.4982 (Official Gazette dated 24.10.2003 and numbered 25269) defines the process concerning the right to information. It regulates this right in line with the principles of equality, impartiality, and transparency, which are the prerequisites of democratic and transparent administration.

Law on Use of the Right to Petition

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, for their requests and complaints, by Article 3 of the Law on Use of the Right to Petition No.4982 (Official Gazette dated 01.11.1984 and numbered 3071). Regarding reciprocity and using the Turkish language in their petitions, foreigners residing in Turkey are entitled to this right.

Expropriation Law

Expropriation Law No.2942 (Official Gazette dated 08.11.1983 and numbered 18215) ensures that the process works duly by the objective, authority, justification, and subject of the process in cases where expropriation is compulsory.

Environment Law

The Environment Law No.2872 (Official Gazette dated 11.08.1983 and numbered 18132) aims to protect the environment, a common asset of all living things, in line with the principles of sustainable development and in a balanced manner.

Regulation on EIA

The Environmental Impact Assessment (EIA) Regulation in Turkey was introduced in 1993 and underwent revisions in 1997, 2002, 2003, 2008, 2013, 2014, and 2022 (current EIA Regulation - Official Gazette Date/Number: 29.07.2022 /31907). Enerjisa's power plant projects were realized in different years and, therefore, subject to relevant Turkish EIA regulations valid at the time. The EIA of Enerjisa facilities was conducted per the Turkish EIA Regulation. The EIA Regulation classifies projects into annexes (Annex I and Annex II) based on the potential environmental impacts considering a 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 must prepare a Project Description Document (PDD). Enerjisa is committed to ensuring that the Project will comply with the EBRD Environmental and Social Policy requirements.

2.2 EBRD Performance Requirements

Enerjisa is committed to implementing a Stakeholder Engagement Plan in line with the EBRD Performance Requirements (2019). Reference is made to PR 1, 2, 3, 4, 5, 6, and 10:

PR 1: Assessment and Management of Environmental and Social Risks and Impacts - this PR recognizes the importance of an integrated assessment to identify the environmental and social risks and impacts associated with projects and the client's management of environmental and social performance throughout the life of the Project.

A successful and efficient Environmental and Social Management System (ESMS) which allows for meaningful engagement between our Company, our workers, and the affected and interested stakeholders "requires a methodical systems approach comprising planning, implementing, reviewing and reacting to outcomes in a structured way to achieve a continuous improvement in performance management."

Identifying and planning to engage with stakeholders in a meaningful manner is conducted to consider their views and concerns in planning, implementing, and operating the operation by PR 10.

PR 2: Labour and Working Conditions - this PR recognizes that for clients and their business activities, the workforce is an asset and that good human resources management and a sound worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key ingredients to the sustainability of business activities.

PR 3: Pollution Prevention and Abatement - this PR recognizes that sustainable development is a fundamental aspect of sound business management and that the pursuit of economic growth and a healthy environment are inextricably linked. Pollution prevention and reduction are key ingredients of a sustainable development agenda, and EBRD-financed projects must meet good international practice in this regard.

PR 4: Community Health, Safety, and Security: this PR recognizes that project activities, equipment, and infrastructure often bring benefits to communities, including employment, services, and opportunities for economic development. However, projects can also increase the potential for community exposure to risks and impacts arising from temporary or permanent changes in population; transport of raw and finished materials; construction, operations, and decommissioning; accidents, structural failures, and releases of hazardous materials.

PR 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement: This PR addresses impacts of project-related land acquisition, including restrictions on land use and access to assets and natural resources, which may cause physical displacement (relocation, loss of land or shelter), and/or economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources or other means of livelihood).

PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources. This PR recognizes the need to protect and conserve biodiversity in the context of projects it invests in. The term 'biodiversity' (or biological diversity) is defined in the Convention on Biological Diversity (CBD) as the 'variability among living organisms from all sources including, inter alia, terrestrial, marine, and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems'.

PR10: Information Disclosure and Stakeholder Engagement - EBRD Performance Requirements (2019) includes the specific requirements for stakeholder engagement.

2.3 Related Internal Policies, Plans and Procedures

Enerjisa has established an integrated Quality, Health and Safety, Environment and Energy management systems and holds the relevant certifications covering Headquarters and all power plants except Karabük SPP, Bandırma SPP, Kentsa NGCCPP, Erciyes WPP, and Akhisar WPP. The list of management system certifications is given in Table 2.

Enerjisa has been a signatory of the UN Global Compact since 02.08.2022 and Women's Empowerment Principles (WEP) since 20.04.2022. Enerjisa is also a member of the Business Council for Sustainable Development Türkiye since 11.01.2022.

Table 2 Management System Certification of Enerjisa

Type of Certification		Validity
ISO 9001: 2015	Quality Management System	20.01.2021 – 19.01.2024
ISO 14001: 2015	Environmental Management System	20.01.2021 – 19.01.2024
ISO 45001: 2018	Occupational Health and Safety Management	20.01.2021 – 19.01.2024
ISO 50001: 2018	Energy Management System	20.01.2021 – 19.01.2024
ISO/IEC 27001:	Information Security Management	21.09.2022 – 21.02.2025

Enerjisa has an integrated Quality, OHS and Environment, Energy Management and Information Security Policy¹ based on the above management systems. In addition to the Integrated Management Systems Policy, Enerjisa has developed the following policies which are disclosed at the company website² :

- Social Responsibility Policy
- Open Door Policy
- People and Culture Policy
- Information Security Management Policy
- Privacy Policy
- Enerjisa Production Code of Business Ethics
- Enerjisa Production Compliance Rules

Environmental aspects/impacts for each power plant are assessed according to the Environmental Impact Assessment Procedure. The EIA Table Form is prepared annually for each operational power plant for operation and maintenance activities. Related to new investments and modifications, the "New Investments and Modifications Environmental Impact Assessment Form" is used to evaluate the impacts before and after commissioning the investment/modifications.

In addition to the procedures mentioned above within the scope of the OHS and environmental management system, there is a Social Management Procedure applicable to all Enerjisa facilities, which covers guidelines for land acquisition and compensation process, social impact management, social support for community benefit, facility-based plans and implementation and social management system.

¹ <https://www.enerjisauretim.com.tr/hakkimizda/yonetim/politikalarimiz/entegre-yonetim-sistemleri-politikasi>

² <https://www.enerjisauretim.com.tr/hakkimizda/yonetim/politikalarimiz/>

3. STAKEHOLDER ENGAGEMENT PROCESS OF ENERJISA

3.1 . Stakeholder Identification

The overall aim of stakeholder identification is to prioritize Project stakeholders for informed consultation and participation. Stakeholder identification is an ongoing process. The list of the identified stakeholders should be assessed and updated according to the grievance mechanism's outputs, the Project's different phases, and the Project updates. In this way, Enerjisa guarantees a transparent and accessible engagement process for everyone through a stakeholder engagement strategy, Enerjisa;

- Determines all project stakeholders; While doing so, it examines all the stakeholders at all levels, from the local community and public institutions to national and international stakeholders.
- Plans management of the relationship with stakeholders, the impact of stakeholder engagement on the Project, the means of communication, and contact frequency to be used for the stakeholders.
- Performs active stakeholder communication at a local level to mitigate the possible negative effects of the Project for the project-affected communities and allow the local communities to benefit from the potential positive impact of the Project.
- Records complaints and demands of the stakeholders and provides feedback to demanding and complaining stakeholders as soon as possible.
- Develops methods for especially vulnerable/disadvantaged groups/individuals to ensure access to the Project in the stakeholder participation locally.
- Tracks culturally appropriate style and method in all communication.
- Creates opportunities for stakeholder engagement by using different communication channels to ensure the effective participation of stakeholders.
- It provides opportunities for other groups affected by the Project, particularly non-governmental organizations (NGOs), to express their opinions on the proposed actions during the Project's life cycle.
- Identifies detailed action plan by preparing Stakeholder Engagement Plan, especially for the Project and ensures monitoring and reporting of procedures since the scope of the project and local needs changes for each specific Project.

In general, stakeholders can be categorized into two groups;

- External stakeholders are the individuals, and the communities who are affected by the Project impacts directly; and
- Internal stakeholders are those who have an interest or influence on the Project.

Thanks to this separation, stakeholders involved in the Enerjisa and other stakeholders can be indicated how they affect or are affected by the Project. In the stakeholder analysis, the roles of the internal stakeholders in the Project, institutional stakeholder participation and their involvement are described. In the analysis of external stakeholders, the role of stakeholders, method, frequency, and subject of the relationships to be established with stakeholders during the Project are discussed

The key stakeholders include:

- Government (e.g., the Republic of Turkey, relevant ministries, municipalities, and other relevant local authorities).
- Local Public Administration
- Lenders
- NGO's international, national, and local
- Vulnerable and disadbantaged Individuiuls/Group:
- Education and training institutions (e.g., Universities, colleges, think tanks).
- Industrial sector (e.g., construction and infrastructure trade bodies). Businesses and individuals directly interested in the Project and/or activity, e.g., running businesses or providing services and supplies to the Company. Goods and services suppliers, contractors
- Internal stakeholders (e.g., Employees, employee representatives, trade unions).
- Project Affected Persons (PAPs) Communities (e.g., affected settlements, local community groups)
- Employees and Company shareholders
- Media.

3.2 Stakeholder Groups at Corporate Level

The table below represents the identified stakeholders by the above classification.

Table 3 Stakeholder Groups of Enerjisa

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
External Stakeholders		
National Institutions: National Government is of primary national political importance to the business and/or projects/activities in establishing policy, granting permits or other approvals, and monitoring and enforcing compliance throughout all stages of the Project or activity life cycle.	<ul style="list-style-type: none"> • Ministry of Energy and Natural Resources • Ministry of Environment, Urbanization, and Climate Change • Ministry of Agriculture and Forestry • Energy Market Regulatory Authority • Ministry of Labor and Social Security • Ministry of National Education 	<ul style="list-style-type: none"> • Policy formulation • Permitting /Regulation
Local Institutions Local government is important to the business and/or Project as they are responsible for implementing legislation and development plans and policies at the municipal or commune level. In addition, the municipalities and/or communes in the Project area will be impacted by the Project. They will need to be informed of progress and plans in their area, to consider the Project activities in their policymaking, regulatory and other duties, and activities.	<ul style="list-style-type: none"> • Governorships of Related Provinces • Municipalities • Provincial Directorate of Environment, Urbanization, and Climate Change • Provincial Directorate of Culture and Tourism • Provincial Directorate of Labor and Social Security • Provincial Directorate Ministry of National Education • Directorate of Land Registry • Directorate of Agriculture and Forestry • Turkey Electricity Transmission Company (TEİAŞ, YTM / Dispatch Centers) 	<ul style="list-style-type: none"> • Social and economic development, • Corporate Social Responsibility, • Management of environmental and social impacts • Permitting /Regulation

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
	<ul style="list-style-type: none"> • Gas Supplier and Distribution Companies (BOTAŞ, AKSA, etc.) • Directorate of National Real Estate 	
Lenders	International finance institutions such as EBRD	<ul style="list-style-type: none"> • Project Finance • Environmental and social impacts
<p>NGOs international, national, and local NGOs with a direct interest in the Project and activity & associated facilities and their social and environmental aspects can influence the Project and/or activity directly or through public opinion.</p>	<ul style="list-style-type: none"> • Sabancı Foundation • SHURA • GUYAD Energy Investors Association • EUD Electricity Producers Association • ETD Electricity Trade Association • PETFORM • TUREB Turkish Wind Power Union • TOBB Energy Committee • TOBB Natural Gas Committee • Istanbul Stock Market Energy Committee • ISO Energy Committee • Turkish Industrialists and Businessmen's Association (TUSIAD) • The Institute of Internal Auditors – Turkey • Institute of Asset Management • International Institute of Risk and Safety Management • United Nations Global Compact (UNGC) • SKD TURKEY • WEPs - Women Empowerment Principles <ul style="list-style-type: none"> - Women associations - Women's Solidarity Foundation - Ankara Productive Women Association - Disabled Women's Association - Women's Education and Employment Association – General Zeki Doğan - Federation of Turkish Women's Associations • Refugee Associations <ul style="list-style-type: none"> - Association for Solidarity with Asylum Seekers and Migrants (Sgdd Asam) – Mamak Branch - Associations for People with Physically Handicapped Life Association Ankara Branch - Independent Movement Association - Mamak - Six Dots Association for the Blind - A Hope for the Disabled Association –Aşık Veysel - Blue Heart Disabled and Non-Disabled Life Club Association – Akşemsettin 	<ul style="list-style-type: none"> • Management of Environmental and Social impacts, • Corporate Social Responsibility • Environmental and social impacts • Cumulative impacts • Economic development • Inclusivity and accessibility • Security impacts

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
Vulnerable Group: Vulnerable groups may be affected by the Project or activity under their physical disability, social or economic standing, limited education, lack of employment, or access to land.	The poor/elderly/people with disabilities in the Project affected settlements	<ul style="list-style-type: none"> Community health and safety impacts
Education Institutions	Universities Schools in Affected Settlements	<ul style="list-style-type: none"> Technical Consultancy Corporate Social Responsibility Capacity Building
Business Environment: Businesses and individuals directly interested in the Project and/or activity, e.g., running businesses or providing services and supplies to the Company.	<ul style="list-style-type: none"> Contractors and subcontractors (construction, maintenance, consulting, and engineering services providers, installations, and equipment suppliers) Suppliers Project Developers and Investors Local Enterprises and small businesses Private transportation services (taxis, minibusses) 	<ul style="list-style-type: none"> Supply of Goods& Services for Power Plants and Headquarters Traffic impact Economic displacement
Media	<ul style="list-style-type: none"> Local and national newspapers, TV channels Social media, Twitter, linked-in, facebook 	<ul style="list-style-type: none"> Relaying correct Project information to communities Advertisements
Project Affected Persons (PAPs) Households and communities that may be directly or indirectly affected by the Project and/or activity. This includes people living on land affected by the Project and/or activity, through direct (temporary) land take or by social and environmental impacts, and other people who visit or use land or resources that may be affected. Primary stakeholders include landowners and land users.	<ul style="list-style-type: none"> Project /Plant-Affected People Muhktars 	<ul style="list-style-type: none"> Downstream Impact / Community Health & Safety Management of environmental and social impacts, Corporate Social Responsibility
Internal Stakeholders		
Company Shareholders	Sabancı Holding, E.ON	<ul style="list-style-type: none"> Reputation regarding Environmental and Social Business growth and shareholder value
Employees	Enerjisa Üretim Employees Contractors and their Employees	<ul style="list-style-type: none"> Labor and working conditions Local procurement Environmental and social impacts

3.3 Stakeholder Engagement Activities

Enerjisa Üretim will maintain an open-door policy around stakeholder engagement. This SEP and relevant social & environmental policies and documentation will be disclosed on the Enerjisa website <https://www.enerjisauretim.com.tr>. Moreover, site-specific SEPs will be

disclosed on websites, and hard copies will be made available at the site field office, relevant Municipality, and affected neighborhood Mukhtar offices.

Enerjisa Üretim has identified the engagement methods, frequency, and targets/evaluation criteria, as presented in the table below. Following the analysis of its stakeholders, Enerjisa has identified the communication platforms and methods, communication frequency, as well as target and evaluation criteria to measure the success of stakeholder engagement as part of the topics highlighted during the stakeholder analysis (**Table 4**):

Table 4 Stakeholder Engagement Methods

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
National Institutions	Communication with authorities follows established procedures in line with regulations. The communication takes place through the following distribution channels: <ul style="list-style-type: none"> • official letters, phone, or email, • meetings with the administration/representatives of the Company, • public events/meetings, 	When needed	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues • Compliance with national regulations • Number of visits conducted • Official correspondence recorded
Local Institutions	Communication with authorities follows established procedures in line with regulations. The communication takes place through the following distribution channels: <ul style="list-style-type: none"> • official letters, phone, or email, • meetings with the administration/representatives of the Company, • public events/meetings, 	When needed	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues • Compliance with national regulations • Number of visits conducted • Official correspondence recorded
Lenders	<ul style="list-style-type: none"> • Face-to-face meetings • Conferences • Phone calls • Periodical Monitoring Reports (Annual Monitoring Reports, Operation Reports, Consultant's Operational Monitoring Reports) 	When needed	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on environmental & social & technical, and financial issues of operations • Compliance with international requirements • Company credibility and financial sustainability
NGOs	<ul style="list-style-type: none"> • Company website • Formal consultation mechanisms; • Meetings • Letters • Email • Phone 	Continuously throughout the year.	<ul style="list-style-type: none"> • Increasing stakeholder engagement for Company's corporate social responsibility topics

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Vulnerable/Disadvantaged Group/Individuals	Once the Company identifies vulnerable groups and/or individuals, these will be engaged to identify any specific information or consultation needs to consider any concerns or impacts. According to necessity, communication must be tailored based on their needs, including face-to-face meetings, phone, and email/ mail communication.	Continuously throughout the year.	<ul style="list-style-type: none"> • Managing the social risks of the projects and mitigating the adverse impacts • Informing PAPs accurately. Improving stakeholder engagement
Education Institutions	<ul style="list-style-type: none"> • Face-to-face meetings • Conferences • Joint projects • Site visits 	Continuously throughout the year.	<p>Ensuring collaboration and information sharing with the universities through Joint Projects</p> <p>Ensuring collaboration with schools at a local level for Social Projects on education</p> <p>Attracting qualified talents- Attending university/ digital career fairs</p>

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Business Environment	<p>Company website along with its log for registering requests of information from suppliers.</p> <p>Tender opportunities are available on the dedicated page of the Company's portal.</p> <p>Communication with potential partners takes place through the following communication channels:</p> <ul style="list-style-type: none"> • meetings with the administration / • representatives of the Procurement Department • Business associations, • tenders for the purchase of services or goods • letters, press releases • public events • email, phone. 	Continuously throughout the year.	<ul style="list-style-type: none"> • Supporting the development of local suppliers • Delivery of goods & services on time for the availability of Power Plants • Giving priority to local procurements • Increasing the opportunities to make a cooperation with local businesses related to Company's activities,
Project Affected Persons (PAPs)	<p>Communication with residents around Company operations and activities is performed through local Municipality and village councils or other relevant bodies and is subject to comment by the public involved. This will differ depending on location, rural/urban setting, and types of impacts and interest levels. Local communication will focus on the disclosure of routine information, meetings with relevant authorities and councils if needed, and use of the grievance mechanism;</p>	Continuously throughout the year.	<p>Sustaining continuous, open, transparent, and constructive communication on Plant-based issues</p> <p>Ensuring effective usage of the Grievance Demand mechanism</p> <p>Sustaining open communication with neighboring Plants on downstream impacts of the Plants</p>

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Media	<p>Communication with the media will be done through the Company website, press releases, newspaper announcements, TV and Radio Campaigns, articles, and interviews.</p> <p>Communication with national and/or natural park administrators will follow established procedures in line with Turkish regulations.</p>	At least two times a year	<ul style="list-style-type: none"> • Informing public accurately • Increasing Company reputation and brand value
Company Shareholders	<ul style="list-style-type: none"> • General Meeting of Shareholders • Financial reports • Letters 	When needed	<ul style="list-style-type: none"> • Ensuring accurate communication flow • Sharing technical & financial & environmental & social performance transparently • Managing Social & environmental & economic sustainability
Employees	<ul style="list-style-type: none"> • Internal meetings w with the administration / People and Culture Business Partners • Quarterly CEO Updates • Local Committee on the Code of Ethics and employee issues • Internal releases • Posters • Corporate events • Internal social projects • Internal competitions • Training courses. • Email • Phone • MS Teams 	Continuously throughout the year.	<ul style="list-style-type: none"> • Ensuring meaningful consultation mechanisms with the employees • Ensuring accessible feedback mechanism for the employees' opinions and grievances • Increasing employee engagement & satisfaction • Providing a safe working environment and conditions in line with OHS requirements

The following table provides a generic Engagement Action Plan with examples of action items that can be defined for stakeholder engagement at different stages of a project lifecycle. This action plan will be amended as required for each project-specific SEP. The proposed Stakeholder Engagement Action Plan will be further detailed and refined to:

- include further engagement activities intended to disclose information on project E&S performance and potential impacts;
- enable stakeholders to understand each Project's risks, impacts, and opportunities.
- Feed back into communities at appropriate levels how the Company considered stakeholders' opinions and inputs during consultation.

Table 5 Engagement Action Plan

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
<i>Examples of actions during pre-construction</i>				
Engage stakeholders in the development of the Projects	All stakeholders	<ul style="list-style-type: none"> • Disclose the Projects via the company website and other relevant communication channels and document and feedback received from the public via the available monitoring tools 	<ul style="list-style-type: none"> • ongoing 	The department responsible for external Relations and Communication
Disseminate the SEP, NTS and other relevant Project Information	All stakeholders	<ul style="list-style-type: none"> • Ensure the publication of the SEP plan on the website 	<ul style="list-style-type: none"> • Before the initiation of construction, works 	The department responsible for external Relations and Communication
Communicate about grievance forms that the website and other channels could use.	All stakeholders	<ul style="list-style-type: none"> • Provide a means for stakeholders to communicate grievances, including for impacts related to construction works associated with Project upgrades 	<ul style="list-style-type: none"> • As early as possible in the project planning stage 	The department responsible for external Relations and Communication
Regular communication and meetings	Municipal and/or local public administrations	<ul style="list-style-type: none"> • Coordinate information about project activities and disseminate information on the construction timeline. • Ensure technical specifications and routing (considering infrastructure location, safety buffer requirements, and associated land access restrictions) are communicated on time to avoid potential livelihood impacts. 	<ul style="list-style-type: none"> • Communication during pre-construction • Additional immediate meetings, if necessary 	Investment Department Construction Contractors

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Identification and engagement with affected landowners and users	Landowners affected by the construction works	<ul style="list-style-type: none"> Identify landowners and users affected by the construction works to obtain access approval when necessary and prevent eventual damages. 	<ul style="list-style-type: none"> Before accessing the land 	Investment Department Construction Contractors
Regular communication and meetings at necessary with the affected communities	Local population	<ul style="list-style-type: none"> Identify vulnerable groups and define appropriate means of making contact, explaining the Project, and understanding their views; Build trust; Listen and collect grievances; Share Information; 	<ul style="list-style-type: none"> Communication during pre-construction Additional immediate meetings, if necessary (for instance, for vulnerable groups) 	Investment Department Construction Contractors
Voluntary Public meetings if needed	All stakeholders	<ul style="list-style-type: none"> Discuss environmental and social impacts associated with the works, including land access and compensation for accidental damages, community health, and safety mitigation measures 	<ul style="list-style-type: none"> Before the initiation of construction works 	Project Manager, Construction Contractors
<ul style="list-style-type: none"> Examples of actions during construction 				
Dissemination of key Information about Project activities request for information/publication as appropriate in the town hall/other public places in the affected localities to bring the given information to the locals	Local population	<ul style="list-style-type: none"> disseminate key announcements on Project activities (e.g., construction schedule, grievance procedure, and forms, contact details) 	<ul style="list-style-type: none"> Updated appropriately during the entire construction period 	Construction Contractors

Activity/Action	Stakeholders targeted	Purpose of activity/action	Timeframe	Responsibility
Regular communication and meetings at necessary with the affected communities	Local population	<ul style="list-style-type: none"> listen and collect grievances; share information; 	<ul style="list-style-type: none"> Communication during construction Additional immediate meetings if necessary (for instance, for vulnerable groups, or if a specific concern arises, or if the works are conducted on private property) 	Construction Contractors
<ul style="list-style-type: none"> Examples of actions during the operation 				
Start of operation	Mayors and mukhtars of affected settlements and community members	<ul style="list-style-type: none"> inform stakeholders of the start of the operation, any health and safety risks for the communities and mitigation measures 	<ul style="list-style-type: none"> before the start of the operation 	The department responsible for external Relations and Communication
Up-to-date and complete information regarding the grievance mechanism and the compensation procedure	All stakeholders; Mayors and mukhtars of affected settlements and community members	<ul style="list-style-type: none"> inform stakeholders of the scheduled maintenance and the extension works (duration, location, etc.) Disseminate the Compensation Procedure online on the company website 	<ul style="list-style-type: none"> ongoing 	The department responsible for external Relations and Communication
Ongoing information on the annual environmental and social performance of the Company	All stakeholders; Mayors and mukhtars of affected settlements and community members	<ul style="list-style-type: none"> Inform stakeholders of the Project's annual environmental and social performance by publishing the yearly sustainability report on the Company website 	<ul style="list-style-type: none"> Yearly 	The department responsible for external Relations and Communication

3.4 Engagement Tools

The consistent use of best practice tools tailored to local context and stakeholders needs to maximize the effectiveness of the engagement action plan.

Table 6 Stakeholder Engagement Tools

Tool*	Description
Company website	<p>The Company website (www.enerjisauretim.com.tr) will provide relevant and up-to-date information regarding construction works and operational aspects. The Project NTS, ESAP and SEP, prepared as part of the environmental and social review package, will be made accessible, online and offline, to all interested stakeholders.</p> <p>The description of the External Grievance Form will be made available to the public on the web.</p>
Social Media Platforms	Facebook and Telegram accounts for frequent updates
Brochures and leaflets	Printed brochures or leaflets supporting information and awareness campaigns
Electronic and postal mail	Subscription emails and postal letters exchanges.
Regular Internal Reporting	Regular reports will be prepared for the Management team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations or non-compliances to the requirements of this SEP, planned activities for the next reporting period, and any other issues of potential concern
Reporting to Stakeholders	Project updates to different stakeholder groups if needed. A Sustainability Report, including reporting on the Company's environmental and social performance of the Company will be published annually and disseminated in local communities via local authorities and partners.

(*) To be updated in due course as necessary.

4. STAKEHOLDER ENGAGEMENT APPROACH AND ACTIVITIES

Enerjisa values relationships with all stakeholders directly or indirectly affected by its activities and prioritizes open, transparent, and trust-based communication with all stakeholders in a broader ecosystem. To this end, Enerjisa continuously communicates with its internal and external stakeholders through various channels. Enerjisa applies different communication methods to obtain stakeholder feedback and to understand their expectations.

The level of impact, in addition to the needs and concerns of the stakeholders will determine the basis of the communication tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in below. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> Information sharing (in particular technical) on project requirements and impacts Invitations to meetings and key events during project implementation Arrangements for obtaining permits, licences, transfer, and allocation of project land Information and data requests that will be utilized for project implementation 	All stakeholders
One-on-one meetings	<ul style="list-style-type: none"> Information collection on an individual basis allowing stakeholders to voice their concerns/opinions about sensitive issues Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> Collective information sharing on project requirements and impacts Receiving comments, feedback, views and perception of project from a group of public institutions Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, and organisations/agencies, national and local media
Consultation meetings	<ul style="list-style-type: none"> Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. Receiving comments, feedback, views and perception of project from a group of stakeholders Collecting grievances and concerns related to the project 	Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organisations/agencies, etc.

	<ul style="list-style-type: none"> Establishing relations with affected communities, and groups 	
Face to face interviews	<ul style="list-style-type: none"> Collecting baseline data on an individual basis with regard to project-affected people (PAPs) impacted by the project Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis Establishing relations on an individual basis 	PAPs, project workers (including workers to be employed for the construction activities, Enerjisa staff, contracted workers, etc.), vulnerable/disadvantaged groups/people,
Focus group discussions	<ul style="list-style-type: none"> Information sharing on a specific topic to a certain group of people including vulnerable/disadvantaged groups Receiving comments, feedback, views and perception of project from a certain group Collecting grievances and concerns related to the project from a certain group Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discuss during the meeting, vulnerable/disadvantaged groups/individuals
Enejisa Website	<ul style="list-style-type: none"> Sharing project relevant information and update on progress Disclosing project/subproject related documentation and communication tools: Environmental and Social Documents, presentations, brochures, etc. Announcements of key events (date/time, venue) 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Digital communication tools social media (Facebook, Twitter, Instagram accounts, WhatsApp groups), national/local television channels, radio stations, SMS, etc.	<ul style="list-style-type: none"> Non-technical information sharing and progress updates Announcements of key events, dates and published documents related with the Project 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Project information brochures/leaflets	<ul style="list-style-type: none"> Sharing brief project information to provide regular update Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, scope of project activities and subprojects, etc. Disseminating site-specific project information 	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organisations/agencies
Online meeting (alternative tool if needed)	<ul style="list-style-type: none"> Information sharing on a specific topic to a group of people including vulnerable groups Receiving comments, feedback, views and perception regarding the project from a certain group 	Any stakeholder group identified throughout the project, including project affected people, vulnerable groups, etc.

	<ul style="list-style-type: none"> • Collecting grievances, concerns and feedback related to the project from a group • Monitoring project activities' environmental and social impacts and risks on a group • Establishing relations with local communities 	
Grievance Mechanism (GM)	<ul style="list-style-type: none"> • Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders 	Any stakeholder group identified throughout the project

Enerjisa’s relations with the public are based on the principles of righteousness, integrity, equality, and independence. Government agencies and regulatory authorities are the primary stakeholders that directly affect Enerjisa. As one of the sector leaders, Enerjisa knows that developing a regulatory framework is necessary to encourage investments and improve efficiency and quality to ensure a reliable and cost-effective grid infrastructure in Turkey. The Company has held meetings with local community leaders (Mukhtar) and stakeholders in the investment areas such as municipalities and district governorships. Enerjisa regularly visit the Governors, district governors, municipalities, and local community leaders (Mukhtars). Moreover, face-to-face interviews allow us to obtain in-depth information about public institutions' past experiences and future expectations.

Stakeholder engagement is conducted across Enerjisa. The extent of engagement, level of interaction, and methods of engagement vary depending on the roles and responsibilities of departments. A summary of the stakeholder engagement activities of Enerjisa is given in this section.

4.1 Internal Stakeholders

Enerjisa’s people are one of the most important assets that make its the leader in the industry. The company aim to ensure our business's sustainability and attract well-equipped individuals to the industry with the vision of becoming the most desirable employer. From this point of view, Enerjisa offers its employees a positive work environment where the employees can work confidently and improve themselves. The foundation of Enerjisa's people and culture management is strengthening by drawing upon its employees' strengths to provide excellent service continuously. The company intends to develop a positive organizational climate, communication, and culture within Company in line with its people and culture practices. Therefore, Enerjisa focuses on issues such as developing employees' leadership qualities and, providing training, development, and offering equal opportunities to all employees. Enerjisa conducts employee engagement surveys annually to measure employee engagement and experience, and ensure they provide the best working conditions. It is essential for the company that its employees maintain a healthy work-life balance, and we support them accordingly. In this scope, Enerjisa has taken steps to implement a flexible working model, dress code and remote working in its headquarters.

4.2 External Stakeholders

a. *Engaging with State and Local Authorities*

Environmental aspects/impacts for each power plant are assessed according to the Environmental Impact Assessment Procedure. The Environmental Aspect Impact Assessment Table Form is prepared annually for each operational power plant for operation and maintenance activities. Related to new investments and modifications, "New Investments and Modifications Environmental Impact Assessment Form" is used to evaluate the impacts before and after commissioning the investment/modifications. As the leading Company in the industry, Enerjisa awares that developing a regulatory framework is necessary to encourage investments, efficiency, and quality to ensure a reliable and cost-effective network infrastructure in Turkey. With this awareness, the company contributes to the process by contacting government agencies and regulatory bodies. Enerjisa's relations with the public are based on the principles of transparency, equality, and impartiality. Enerjisa relationships with public institutions are independent of any political view and managed as required by its corporate identity.

b. *Engaging with Local Communities*

The Project may require some permanent acquisition of private land due to investments. The company informs and consults the affected landowners/users regarding the land acquisition and compensation procedures, legal rights, and land use restrictions during the construction and operation through written notifications, community leaflets, posters, newsletters, and face-to-face meetings.

Enerjisa records, monitors, and respond to PAPs' concerns and requests. Directly affected landowners/users will be identified while preparing the expropriation plans. To minimize expropriation needs, the company will take all necessary measures to avoid physical resettlement in future investment projects.

Among the landowners/users, potentially vulnerable groups will be identified. Enerjisa ensures project information disclosure for land acquisition is culturally appropriate and caters to vulnerable groups such as women, people with disabilities, the illiterate, the elderly, people with special needs, and land users without official title deeds.

Enerjisa communicates with project-affected communities and other relevant stakeholders, as appropriate, on mitigation measures and plans. Enerjisa implements a Social Management Procedure that includes site social specialists, point of contact, or plant managers conducting public information meetings with affected community members. For example, Enerjisa informative meetings on the downstream impacts of the HEPPs are held every year in the nearby settlements. These meetings aimed to inform the local people and local authorities of the potential effects that may be faced and precautions to be taken during the operation phase. Informative leaflets on emergency responses to flooding were disseminated to local communities, and informative posters were placed in the most visited and easily visible places.

There is also a Social Management Procedure applicable to all Enerjisa facilities, which covers guidelines for social impact assessment, public consultation, grievance/demand mechanism, land acquisition and compensation process, social support for community benefit, facility-based plans and implementation, and social management system. The Social Management Procedure states that Enerjisa considers international social performance standards and Sustainable Development Goals in addition to the national

standards and regulations.

c. *Engaging with Non-Governmental Organisations (NGOs)*

The company is one of the leaders in its sector through solid engagement in sector-specific NGOs. Enerjisa is a member of various organizations where sector-specific developments are discussed continuously.

5. GRIEVANCE & DEMAND MECHANISM

5.1 External Grievance Mechanism:

The External Grievance Mechanism is in place and enables any stakeholder to make a grievance about the way the Project is being designed or implemented. Grievances may be specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

For the Project-affected communities, an effective grievance mechanism provides an accessible yet formalized (identification, tracking, and resolving of grievances) alternative to an external dispute resolution process.

The grievance mechanism is tailored to the local context of the Project environment. It aims to find mutually beneficial solutions to settle issues and develop a trust-based Company-community relationship. The Company commits to process any grievance received on time, via a transparent, culturally appropriate procedure, at no cost, and without retribution for the party presenting the grievance.

The Company monitors the use of grievance management procedures in each responsible area. Recognizing the different activities of the Company and the presence of various contractors, new projects/activities follow the Company's grievance mechanism based on existing specific grievance management procedures. These are transparent, culturally appropriate, free, and without retribution for the party presenting the grievance.

Enerjisa has defined a Grievance Mechanism for the local stakeholders near the Plants. Two separate forms are used for registering the grievance and for the closure. These forms are saved within the EBA system. Samples of the grievance register and closure forms are presented in Annex A.

The steps of the external grievance mechanism are as follows:

1. External stakeholders can initiate the grievance mechanism by using the following methods:
 - Verbally during face-to-face meetings/visits
 - Emails
 - Phone calls
 - Petition
 - Grievances received by Contractors
 - Grievance boxes
2. The received grievance/demand is recorded by the Social Focal Points of Contacts in the "Grievance& Demand Register Form" fields. The form is presented within the EBA system under the Social Management Processes title. If wanted, the grievance holders can be recorded anonymously as well.
3. All grievances and demands (including the ones received verbally) are recorded in the form and within the system. The record is sent to Center Social Specialists, Plant Manager, Manager of Social and Administrative Services, and Technology Director for the review, control, and approval process in the EBA system.
4. The Social Focal Point of Contact contacts the related department about the grievance/demand. The response of the related departments delivers their

solution for the grievance/demand to the Point of Contact and Plant Manager and Social Focal Point of Contact. In the approval process, the Center Social Specialist and Social Focal Point of Contact answer an algorithm with questions. According to the result, grievances and demands are approved or rejected. The necessary actions for the solution of the grievance are taken.

5. The grievance closure process is initiated by notifying the grievance/demand holder about the actions that will be taken related to their grievance. The Social Focal Point of Contact fills out the closure form in the EBA system. The record is sent to Center Social Specialists and the Plant Manager for the control and approval process in the EBA system.
6. Grievances and demands need to be closed within 30 days, and the stakeholder needs to be notified about the closure of the grievance. If it is not possible to resolve the grievance/demand within 30 days, with the approval of the grievance/demand holder, the solution period for the grievance/demand could be extended.

The grievance/demand process is shown:

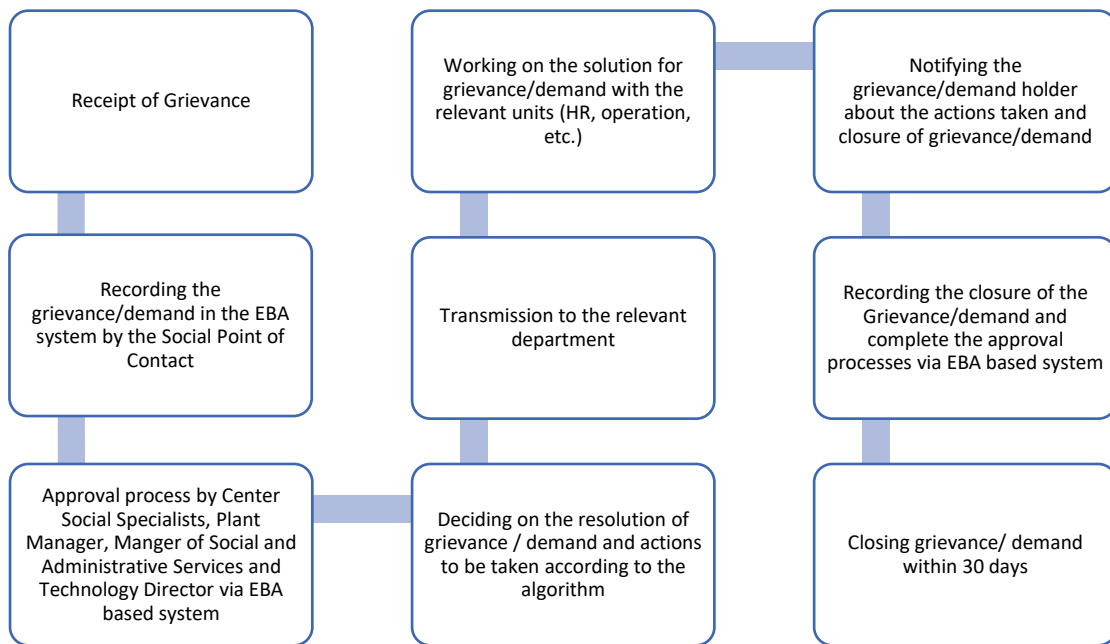


Figure 4 External Grievance Mechanisms Process

EBA's recording system holds all the recorded data on grievances and demands. The grievances and demands can be seen within the automatic listing produced by EBA, and location-based reporting is possible through this system. According to the Privacy of Personal Data Commission and Enerjisa Retimes Personal Data Protection and Management Policy, it is recommended that a clause is added for the external grievance form and grievance box form, stating that the personal information will be kept protected (according to Privacy Act Law No 6698) and that the grievance holders are informed about the fact that their personal information will be saved.

The channels listed below can also be used for receiving grievances or demands. The Corporate Communication Department manages these grievances/demands per Corporate Communication Procedure & Crisis Management Procedure.

- Social Focal Points (TBD)
- Phone (TBD)
- Email
- Official Letter
- Social media accounts,
- The corporate website

5.2 Internal Grievance Mechanism

There are formal employee grievance mechanisms in place in Enerjisa. There are relevant practices that are implemented within the Company as explained below:

- There is an ethics declaration process within the Company that the Internal Audit Department manages. Employees can make ethics declarations using an ethics hotline, an email address, and an online form. An Ethics Evaluation Procedure is implemented for this purpose. Grievances/complaints coming through these channels are recorded and assessed by the Internal Audit Department. If a grievance/complaint is an ethical issue, the ethics committee evaluates it and takes action; if the issue is related to another department, it is forwarded to the related departments, as reported. Contractors can also use the Ethics Hotline and the online form.
- As explained below, employees can convey suggestions and grievances during "Employee Committee" meetings.
- Employees can talk to their manager and People and Culture Business Partner to convey their grievances.
- Employees can convey their suggestions through the Suggestion System of the Company.

Complaints are received through one-to-one meetings, petitions, telephone calls, and collective meetings. After the relevant responsible evaluate the complaints, the decision is shared with the complainant, and the opened complaint is closed.

Enerjisa Üretim offers its employees a positive working environment based on open and continuous communication. Employees' internal grievance mechanism operates with the tools explained below:

EBA Suggestion System:

Every Enerjisa Üretim employee has the right to raise a suggestion through EBA system about:

- Digital transformation,
- Operational Excellence & Productivity
- Employee Motivation and Improvement
- HS
- Environment

Employee Committees:

The Employee Committee consists of employee representatives, HR, and management; it reviews employee grievances and identifies action plans, including taking up the issues to the upper management.

This platform encourages a free information flow between the Company and employees via employer's and employees' representatives. Issues (problems, suggestions, etc.) concerning employees are discussed to see if there are appropriate solutions/actions that the Company can apply. Topics covered are mostly on;

- HSE
- Working conditions (locker rooms, rest areas, heating, air conditioning, etc.)
- Security, meal, and transportation services
- Training and development
- Camp Conditions (in related locations)

Employee Committees are held monthly in headquarters and power plants/regions. Members are mostly operation/maintenance managers, HS&E responsible, HR business partners, administration and social affairs managers, and selected employees' representatives from departments/locations. Meeting minutes are recorded and communicated to employees using different platforms (email, notice boards, etc.), followed by actions in the next meeting.

Ethical Notifications:

To ensure that conflicts regarding the Enerjisa Üretim Code of Ethics are noticed, Enerjisa Üretim Ethic Hot Line is in effect. Both Code of Ethics and Hot Line are announced throughout the Company. The notifications made via the Hot Line are only accessible by the Internal Audit Directorate. Internal Audit is responsible for further investigation of notification, performing the investigations within the guidance of Ethic Investigation Procedure, and reporting them. Investigation results and recommendations are discussed in the Workplace Behavior Evaluation Committee, and this Committee decides on actions.

6. MONITORING AND REPORTING

6.1 Monitoring and evaluation activities

Monitoring and evaluation of the stakeholder engagement process is of utmost importance to ensure timely and effective decision making for Project implementation.

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the corporate SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in below.

Monitoring Subject	Key Performance Indicators (KPIs)	Internal Monitoring Frequency
Stakeholder engagement	<ul style="list-style-type: none"> • Number of meeting with external stakeholders according to: <ul style="list-style-type: none"> ○ Type of stakeholder group (e.g. central or local governmental authorities, gender disaggregated, vulnerable persons, NGOs) ○ Engagement method (e.g. face to face meetings, remote meetings including phone or video calls, correspondence, updates through Project website, announcements, etc.) ○ Meeting locations • Number of meeting with internal stakeholders 	Monthly monitoring (Daily records on Stakeholder Engagement Logs to be kept by the Social Focal Point)
External grievance and demand mechanism	<ul style="list-style-type: none"> • Number of external grievances/feedbacks per: <ul style="list-style-type: none"> ○ Settlement ○ Subject (e.g. dust, noise, damage to land, expropriation issues, traffic, health and safety, etc.) ○ Company (Contractor or Subcontractors) ○ Related department within the Company, Contractor or Subcontractor ○ Response timeframe ○ Resolution timeframe • Status of grievance/feedback (open, closed, etc.) 	Monthly monitoring (Daily records on External Grievance Register to be kept by the Social Focal Point)
Internal grievance and demand mechanism	<ul style="list-style-type: none"> • Number of internal grievances/feedbacks <ul style="list-style-type: none"> ○ Company ○ Related department within the Company, Contractor or Subcontractor ○ Subject (e.g. health and safety, accommodation conditions, work conditions, etc.) • Status of grievance/feedback (open, closed, pending etc.) <ul style="list-style-type: none"> ○ Response timeframe ○ Resolution timeframe 	Monthly (Daily records on External Grievance Register to be kept by the Social Focal Point)

This SEP will be periodically revised and updated annually during Project implementation. Monthly summaries of grievances will be prepared for the grievances raised by internal and external stakeholders, queries and related incidents, and the implementation status of corrective/preventive actions, consultations, and disclosure activities. Also, SEP monitoring and evaluation reports will be submitted to EBRD periodically. The Company will publicly report on its environmental and social performance annually, including a summary of any grievances raised and how they have been resolved. To inform the external stakeholders Annual Environmental and Social Report (an overview of the Annual

Environmental and Stakeholder engagement activities will be documented and filed to ensure accountable delivery of commitments made to stakeholders).

6.2 Reporting

The Company will keep track of commitments made (commitments tracker) and communicate progress made against these commitments regularly. The Company will prepare an Annual Stakeholder Engagement Progress Report summarizing SEP results, based on which updated information will be delivered and included in the yearly Sustainability Report.

Enerjisa will be responsible for reporting to Lenders semi-annually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted and disaggregated data about the grievances during the specified period. Stakeholder engagement activities can be presented in a tabular format listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action will be presented.

CONTACT INFORMATION FOR THE PUBLIC

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Annex A. External Grievance Register and Closure Forms

GRIEVANCE & DEMAND REGISTER FORM

A - General Information	
Project/Plant Name	
Name of the Recorder	
Form Registry No	
Date of Register	
Place of Register:	<input type="checkbox"/> Site office <input type="checkbox"/> Settlement/Location.....
Type of Register	<input type="checkbox"/> Grievance <input type="checkbox"/> Demand
B- Way of Receiving Grievance/Demand	
<input type="checkbox"/> Telephone <input type="checkbox"/> Petition (Please attach one copy to this form)	<input type="checkbox"/> Face-to-face meetings (site visits) <input type="checkbox"/> Community meetings (Public Information Meetings etc.) <input type="checkbox"/> e-mail <input type="checkbox"/> Other.....
C.1- Information about the Complainant/Demandant	C.2- Stakeholder Category
Name-Surname	<input type="checkbox"/> Local governmental authorities <input type="checkbox"/> Local people (individual) <input type="checkbox"/> Local people (community) [...# of beneficiary] <input type="checkbox"/> Private sector <input type="checkbox"/> Non-governmental organization <input type="checkbox"/> Main contractors <input type="checkbox"/> Sub-contractors <input type="checkbox"/> Enerjisa Üretim Projects/Operations Employees <input type="checkbox"/> Workers of (Sub-)Contractors <input type="checkbox"/> Consultant <input type="checkbox"/> Media
Contact Info	
Address	
Village/ Settlement	
District/ Province	
Signature of Complainant/Demandant Only for the complaints/demands received via meetings, info desk, and visits.	
D.1- Information about Grievance/Demand	D.2- Grievance/Demand Category
<i>Detailed Information about Grievance/Demand (may include settlements of compliant/demandant)</i>	<input type="checkbox"/> Damage to land/Crop/Structure <input type="checkbox"/> Damage to access roads <input type="checkbox"/> Environmental Impacts (pollution, dust, noise) <input type="checkbox"/> Use of Lands without Owner's Consent and Legal Permission <input type="checkbox"/> Restricting access to natural resources -lands <input type="checkbox"/> Payment of Usage Fee or Compensation <input type="checkbox"/> Expropriation <input type="checkbox"/> Resettlement <input type="checkbox"/> Demand for job or work from local <input type="checkbox"/> Working conditions <input type="checkbox"/> Laying off <input type="checkbox"/> Non-payments of workers' wages <input type="checkbox"/> Debt to local suppliers or sub-contractors <input type="checkbox"/> Demanding any supports on education

	<input type="checkbox"/> Demanding any supports for households/individuals <input type="checkbox"/> Demanding any supports for settlement/community <input type="checkbox"/> Demanding any supports for local authorities
E- Actions Recommended	

GRIEVANCE & DEMAND CLOSURE FORM

Grievance/Demand Form Number	
Name of the Recorder	
Date/...../.....
<i>CLOSURE OF GRIEVANCE/DEMAND</i>	
<p>In this section of the Closure Form, Information on how the grievance or demand has been resolved and the amount of money spent to resolve the demand or grievance, if any, will be provided.</p> <p>This part will be terminated through receiving signature of the compliant/demandant to prove his/her consent and signed by the representative of Enerjisa Üretim, after having made the related explanation on the closure process.</p> <p>(If the grievance is received through the internet, email respond will be sufficient)</p>	
<i>Explanation:</i>	
<i>Amount of Expenditure:</i>	
<i>Attachments</i>	
<i>Complainant/Demandant Name-Surname and Signature</i>	<i>Enerjisa Üretim Representative Title-Name-Surname and Signature</i>