



BİLGİN GÜÇ SANTRALLERİ ENERJİ ÜRETİM A.Ş.

**HACILAR HYDROELECTRIC POWER PLANT HYBRID SOLAR POWER
PLANT PROJECT (9.9792 MWm)**

STAKEHOLDER ENGAGEMENT PLAN

CNR-PLN-BIL-SEP-001

February 2025

Rev.00



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DOCUMENT REVISION HISTORY SHEET

Rev.	Date	Prepared by	Checked by	Approved by	Description
00	February 2025	Sıla TONBUL	Özge ÇELİK	Ayşe CANBAZ AKKURT	First Submission

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ABBREVIATIONS/DEFINITIONS

A.Ş.	Incorporated Company
Bilgin Energy Project Owner	Bilgin Güç Santralleri Enerji Üretim A.Ş.
CİMER	Presidential Communication Center
ÇINAR / Consultant	Çınar Mühendislik Müşavirlik A.Ş.
CLO	Community Liaison Officer
DVIG	Disadvantaged/Vulnerable Individuals or Groups
E&S	Environmental and Social
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
Existing Plant/Plant	Hacılar Hydroelectric Power Plant
FI	Financial Intermediaries
GBV	Gender-Based Violence
GM	Grievance Mechanism
GMP	Good Manufacturing Practices
GRM	Grievance Redress Mechanism
HEPP	Hydroelectric Power Plant
HR	Human Resources
IFC	International Finance Corporation
İŞKUR	Turkish Employment Agency
ISMS	Information Security Management System
ISO	International Organization for Standardization
KfW	KfW Development Bank
km	Kilometers
KPI	Key Performance Indicator
KVKK	Personal Data Protection Law
kWh	Kilowatt-hour
MoM	Minutes of Meetings
MW	Megawatt
MWm	Megawatt-mechanical
NGO	Non-Governmental Organization
No.	Number
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAP	Project Affected Parties
Project	Hacılar HEPP Hybrid Solar Power Plant Project (9.9792 MWm)
PS	Performance Standards
SEA	Sexual Exploitation and Abuse

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SEA / SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPP	Solar Power Plant
TKYB	Türkiye Kalkınma ve Yatırım Bankası Development and Investment Bank of Türkiye
WB	World Bank
WBG	World Bank Group
W-GM	Workers' Grievance Mechanism
YİMER	Foreigners Communication Center

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1 INTRODUCTION AND PROJECT SUMMARY

Bilgin Güç Santralleri Enerji Üretim A.Ş. (“Bilgin Energy” or “Project Owner”) is a pioneer company with its renewable energy investments in the Turkish energy market. The company started its activities in the energy sector in 1994, focusing on wind and hydro projects and developed projects with its in-house measurement and analysis teams. Hacılar Hydroelectric Power Plant (“HEPP” or “Existing Plant”) in Darende-Malatya is the first licensed private sector hydroelectric powerplant investment and taken under commercial operation in 2003 with the installed capacity of 14 MW (Megawatt). Similarly, Bandırma Wind Power Plant in Balıkesir with the installed capacity of 30 MW, is the first licensed private sector wind powerplant investment in Türkiye and taken under commercial operation in 2006. Bilgin Energy is also the first company in Türkiye that acquired carbon reduction emission certificate with its renewable investments. With 370 MW wind energy, 477 MW hydro powerplant investments Bilgin Energy contributed a total of 847 MW renewable installed capacity to Turkish economy producing 3 billion Kilowatt-hour (kWh) energy from local and renewable resources.

Samsun Combined Cycle Natural Gas Power Plant with the installed capacity of 890 MW is one of the most efficient and low emission natural gas power plant in Türkiye, is acquired by Bilgin Energy in 2018. Bilgin Samsun Combined Cycle Natural Gas Power Plant has a capacity of producing around 7 billion kWh energy with its advanced technology.

Having a portfolio composed of mainly renewable powerplants and a combined cycle natural gas power plant, Bilgin Energy has a potential of supplying 3.5% of Turkish electricity consumption with its 1737 MW environment friendly powerplants.

Bilgin Energy plans to establish and operated “Hacılar HEPP Hybrid Solar Power Plant (SPP) Project (9.9792 MWm) (“Project”)” in the Darende district of Malatya province.

On 31.12.2024, the Project Owner signed a loan agreement with the Türkiye Kalkınma ve Yatırım Bankası (Development and Investment Bank of Türkiye, “TKYB”) to finance project activities. The loan term is set at 6 (5+1) years.

1.1 Overview

The Stakeholder Engagement Plan (SEP) prepared for the Project is designed to cover the Project from preparation and planning through construction and operation phases. This Project-specific SEP has been prepared as a public document open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

Bilgin Energy invites its stakeholders to actively participate in the development of this SEP into an interactive and dynamic document. Project owner welcomes feedback on the proposed engagement process.

1.2 Objectives and Scope of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism through which people can raise concerns, provide feedback or lodge complaints about project activities or any project-related activity.

The primary objective of the SEP is to ensure the participation of all interested parties, including individuals, groups and organizations that may be affected by or have an interest in the project. It ensures that there is a continuous flow of information between these stakeholders and the project throughout the project period. The overall objectives of the SEP include:

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- Disclose appropriate project information on Environmental and Social (E&S) risks and impacts in a timely, understandable, accessible and appropriate manner and format,
- Identify stakeholders directly or indirectly affected by or interested in the project, including vulnerable/disadvantaged individuals/groups,
- Planning and implementation of inclusive stakeholder engagement activities from project preparation and planning to construction and operation phases,
- Determining the frequency and scope of information as well as the content of consultation activities,
- Establish a Grievance Redress Mechanism (GRM) to facilitate open communication with stakeholders throughout the life cycle of the project,
- Ensuring that concerns and expectations raised by stakeholders are considered in stakeholder consultations and project decision-making and planning stages.

The first aspect of the SEP is meaningful consultation. Meaningful consultation;

- starts early in the project planning phase to guide project design.
- promotes stakeholder feedback, particularly to inform project design and involve stakeholders in identifying and addressing environmental and social risks and impacts.
- continues a regular basis as risks and impacts emerge.
- is based on the advance disclosure and dissemination of sufficient, relevant, clear, open, impartial, meaningful and easily accessible information within a timeframe that allows for meaningful consultations with stakeholders. This information is presented in a culturally appropriate format, in the relevant local language(s) and in a manner that is understandable to stakeholders.
- takes stakeholder concerns and questions into account and responds to feedback.
- actively support inclusive engagement with project affected parties.
- is free from external manipulation, interference, coercion, discrimination and intimidation. Minutes of consultations are prepared and made public.

As TKYB is the lending institution under the project, the environmental and social performance of the project during the investment/construction and operation periods should be in line with the IFC's Performance Standards (PSs) on Environmental and Social Sustainability, KfW Sustainability Guideline and TKYB's Environmental and Social Policies as well as National Legislation.

This Project-specific SEP is intended as a public document, open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

1.3 Project Information, Location and Area of Influence

The Project aims to implement a SPP as an auxiliary resource (hybrid) for the currently operational Hacilar HEPP. In this way, the existing Hacilar HEPP will be transformed into a hybrid electricity generation facility. The Project area and the existing plant are located in the Darende district of Malatya province.

The Project area, the existing plant area, and the nearest settlements are showed in Figure 1 and distances to these settlements are provided in Table 1.

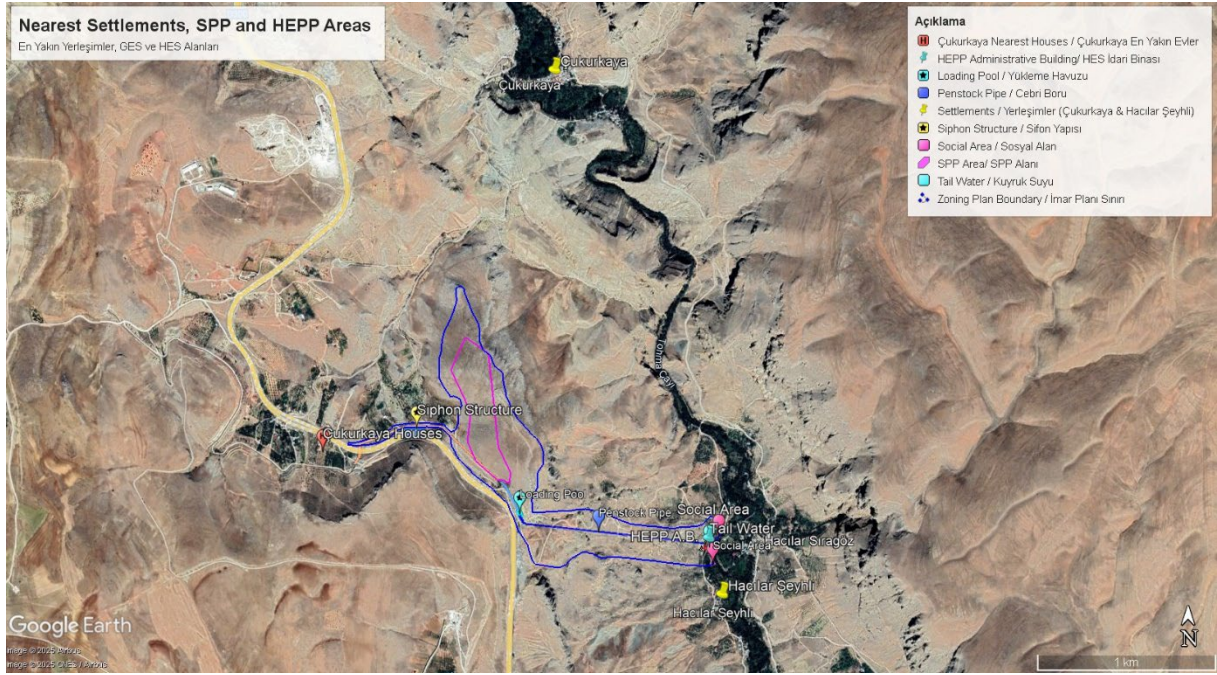


Figure 1. Project Location Map (Existing HEPP, Project and Nearest Settlements)

Table 1. Air Distance of Settlements to the Existing Plant and Project Area

Settlement Name	Air Distance to Existing Plant (km)	Air Distance to Project Area (km)
Hacilar Şeyhli Neighborhood Nearest House	0.13	1.22
Hacilar Şeyhli Neighborhood Center	0.35	1.34
Çukurkaya Mahallesi Neighborhood Nearest House	2.21	0.83
Çukurkaya Neighborhood Center	2.73	1.46
Darende District Center	6	6.6
Malatya Province Center	80	81

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1.4 Potential Project Impacts and Summary of Mitigations

The potential environmental and social risks and impacts that may arise during the construction and operation phases of the Project are summarized in Table 2. The importance of the identified impacts and risks has been evaluated using the following approach. In this process, the location of the Project area, the sensitivities of the receptors within the impact area, the distance to sensitive receptors, and the magnitude of the impacts and risks (criteria such as scope, duration, frequency, and reversibility) have been considered.

High: The impacts and risks are considered to be significant. It is mandatory to implement impact reduction and mitigation measures to lower the level of significance before proceeding with the Project.

Medium: The impacts and risks are unlikely to be the primary decision-making factors. However, their cumulative effects, if they lead to an increase in the overall negative impact on a specific receptor, could influence the decision-making process. Impact reduction and mitigation measures will be implemented to lower the significance of the impact.

Low: The impacts and risks are unlikely to take a critical role in the decision-making process, but they may emerge as important local factors for improving the project's design in the future. Compliance with standards and safety criteria is considered sufficient to proceed.

Negligible: The impacts are below the threshold of perception and, therefore, are considered acceptable under normal operational procedures.

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Table 2. Environmental and Social Risks and Impacts of the Construction and Operation Phases of the Project

Issue	Construction Phase		Operation Phase	
	Risks and Impacts	Significance*	Risks and Impacts	Significance*
Waste Management and Resource Use	<ul style="list-style-type: none"> Raw material and energy use due to land preparation and construction activities, Potential impacts as a result of inadequate management of hazardous and non-hazardous solid waste, which could result in environmental pollution and health and safety risks to workers and the community, Potential impacts as a result of inadequate management (storage, separation etc.) of excavation wastes and topsoil, Additional load on waste management facilities around the project area in case of improper waste management during the construction phase. 	High	<ul style="list-style-type: none"> Raw material and energy use due to maintenance and repair activities, Potential impacts as a result of inadequate management of hazardous and non-hazardous solid waste, which could result in environmental pollution and health and safety risks to workers and the community, Additional load on waste management facilities around the project area in case of improper waste management during the operation phase. 	Low
Environmental Noise Management	<ul style="list-style-type: none"> Increase in noise and vibration from land preparation and construction activities. 	High	<ul style="list-style-type: none"> Increase in noise and vibration from maintenance and repair activities, 	Negligible
Air Quality Management	<ul style="list-style-type: none"> Increase in dust emissions due to excavation works during the land preparation phase and during the placement of panel mounting structure, Exhaust gas emissions due to the operation of construction machinery/equipment and subsequent risk of air pollution. 	High	<ul style="list-style-type: none"> Risk of exhaust gas emissions and subsequent air pollution if heavy machinery is required during maintenance and repair activities. 	Negligible
Water and Wastewater Management	<ul style="list-style-type: none"> Impacts on the receiving environment (soil and water resources - groundwater) due to improper management of wastewater, waste and chemicals/hazardous substances Impacts/risks on employees' health due to the quality of drinking and potable water. 	Moderate	<ul style="list-style-type: none"> Potential impacts on water resources in case panel cleaning water is obtained from water sources (not applicable if panel cleaning water is purchased from a supplier), Impacts on the receiving environment (soil and water resources - groundwater) due to improper management of wastewater, waste and chemicals/hazardous substances, Impacts/risks on employees' health due to the quality of drinking and potable water. 	Moderate
Community Health, Safety, and Security	<ul style="list-style-type: none"> Increased risk of traffic accidents due to land preparation and construction related activities and resulting negative impact on the flow of daily life, Risks that may arise in emergency situations, Risks that may arise as a result of security personnel not being appropriate, not receiving the necessary training and not fulfilling their duties correctly, The possibility of unauthorized access as a result of the lack of fencing, barriers, etc. in the project area, Increased air, water and soil pollution and increased noise levels in case management plans are not effectively implemented. 	High	<ul style="list-style-type: none"> Communication problems with stakeholders in case of inadequate management of stakeholder engagement, Risks that may arise in emergency situations, Risks that may arise as a result of security personnel not being suitable, not receiving the necessary training and not fulfilling their duties correctly, The possibility of unauthorized access as a result of the lack of fencing, barriers, etc. in the project area, Increased air, water and soil pollution and increased noise levels in case management plans are not effectively implemented. 	Moderate
Traffic Management	<ul style="list-style-type: none"> Risk of traffic problems, accidents and delays as a result of increased vehicle traffic, Risk of potential negative impacts on local communities as a result of vehicles passing through nearby settlements, Increase in noise and vibration from construction activities, Risk of health problems from dust and exhaust emissions, Risk of impact to infrastructure from frequent use of heavy construction vehicles. 	High	<ul style="list-style-type: none"> Risks that may arise due to increased vehicle traffic during maintenance and repair activities, Risk of potential negative impacts on local communities as a result of vehicles coming for maintenance and repair passing through nearby settlements. 	Low
Occupational Health and Safety Management	<ul style="list-style-type: none"> Noise and Vibration: Exposure to high noise and vibration from construction equipment and machinery. Working at Heights: Risk of falls while installing solar panels and assembling support structures. Falling Objects: Falling materials or tools used during construction. Moving Equipment: Accidents caused by cranes, heavy machinery, and vehicles used on-site. Exposure to Chemicals: Working with chemicals such as concrete additives, paint, solvents, and adhesives. Fuel and Oil Leaks: Fuel or oil spills from construction machinery used on-site. Heavy Lifting: Manual handling of solar panels or construction materials. Repetitive or Strenuous Movements: Tasks requiring frequent repetition or work in improper postures. Electric Shock: Risks associated with electrical connections or the use of electrically powered equipment. 	High	<ul style="list-style-type: none"> Machinery and Equipment Risks: Physical injury risks due to moving parts of HEPP and SPP equipment. Slips and Falls: Risks caused by slippery surfaces or uneven ground within the facility. Chemical Leaks: Risks arising from hydraulic systems, oils, or cleaning agents. Electric Shock: Contact with high-voltage lines or electrical equipment of the hybrid energy system. Arc Flash: Sudden flash hazards that may occur during electrical failures. Insect and Animal Pests: Biological threats from insects or rodents in the SPP area. Risk of Infectious Diseases: Potential spread of diseases among facility employees. Work Pressure and Stress: Psychological strain and loss of motivation due to workload and work schedules. Shift Work: Fatigue caused by night shifts or extended working hours. 	High
Labor and Working Conditions	<ul style="list-style-type: none"> All employees work under equal and fair conditions, Participation of all employees in disclosure processes, Employees have signed the Code of Conduct, Informing employees about gender-based violence, sexual exploitation and abuse, sexual harassment and discrimination, 	Moderate	<ul style="list-style-type: none"> All employees work under equal and fair conditions, Participation of all employees in disclosure processes, Employees have signed the Code of Conduct, Informing employees about gender-based violence, sexual exploitation and abuse, sexual harassment and discrimination, 	Low

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Issue	Construction Phase		Operation Phase	
	Risks and Impacts	Significance*	Risks and Impacts	Significance*
	<ul style="list-style-type: none"> Ensuring participation in environmental trainings along with mandatory Occupational Health and Safety (OHS) trainings, Actively initiating Workers' Grievance Mechanism. 		<ul style="list-style-type: none"> Ensuring participation in environmental trainings together with mandatory OHS trainings, Maintaining an active Workers' Grievance Mechanism. 	
Stakeholder Engagement and Grievance Mechanism Redress	<ul style="list-style-type: none"> Establishing a Project-specific website and contact addresses, Announcement of all communication channels, Effective and transparent management of all communication channels, Identification of stakeholders and particularly vulnerable groups, Identifying communication and engagement methods specific to stakeholders and vulnerable groups, Establishing an appropriate environment for regular information and consultation processes, Establishing a calendar and budget for meetings and processes, Creation of informative documents and documents about the project, Establishing a Grievance Mechanism prior to construction and announcement to all stakeholders, Actively initiating the Workers' Grievance Mechanism. 	Moderate	<ul style="list-style-type: none"> Maintaining the Project-specific website and contact addresses up to date, Effective and transparent management of all communication channels, Compiling feedback from stakeholders and particularly vulnerable groups, Develop and diversify communication and engagement methods specific to stakeholders and vulnerable groups, Establishing an appropriate environment for regular information and consultation processes, Establishing a calendar and budget for meetings and processes, Updating informative documents and documents about the project, Maintaining the Grievance Mechanism, Maintaining the Workers' Grievance Mechanism. 	Low
Biodiversity Management	<ul style="list-style-type: none"> Habitat destruction during construction work, Invasive species being brought into the project area, <i>Testudo graeca</i> not being able to leave the construction area due to it is slow movements. 	Low	<ul style="list-style-type: none"> Control of habitat destruction by the Botanist, Transport of invasive species to the project area, <i>Testudo graeca</i>'s slow movements prevent it from leaving the construction area. 	Low
Cultural Heritage Management	<ul style="list-style-type: none"> Impacts on intangible cultural heritage 	Low	<ul style="list-style-type: none"> Impacts on intangible cultural heritage 	Negligible

*The significance rating of the relevant impact and/or risk is represented in **red**, **orange**, **yellow** and **green** colors under four categories: high, medium, low and negligible, respectively.

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The location of the Project area within a residential area makes the management of environmental and social impacts even more critical. It is of utmost importance to avoid cumulative impacts in terms of environmental and social components, especially in terms of the prevention of air, water, soil and noise pollution and public health, safety and security. It is also recommended that appropriate landscaping and landscaping practices are implemented to enhance environmental harmony by preserving the visual aesthetics of the project area. These approaches are critical both to ensure environmental sustainability and to increase social acceptance of the project.

Information on potential environmental and social impacts, mitigation measures, implementation responsibility, monitoring procedure, monitoring responsibility, budget and timeframe for the pre-construction, construction, operation and decommissioning phases of the Project are included in the Project-specific Environmental and Social Management Plan (ESMP) (CNR-PLN-BIL-ESMP-001).

The mitigation measures/improvements to be implemented across the categories of environmental and social risks identified in Table 2 above are summarized as follows:

- The Stakeholder Engagement Plan and Grievance Redress Mechanism will be announced in the pre-construction period and feedback will be received from stakeholders.
- Project Grievance Redress Mechanism will be effectively implemented. It will be shared with external stakeholders in the area of impact and necessary information will be provided. All external grievances will be recorded and managed in accordance with the procedure, and the entire grievance management process will be recorded and closed.
- If any comments or complaints regarding environmental and social impact are received through the Grievance Redress Mechanism, the matter will be evaluated, and necessary corrective and preventive actions will be implemented.
- Engagement with local communities and stakeholders around the project area will be undertaken to understand concerns and gather feedback on issues related to environmental and social impact.
- In case of emergencies arising from Project works or construction site that may pose a risk to the community, the local community will be informed using appropriate means (e.g. phone call, face-to-face meeting).
- The construction area and access roads will be assessed taking into account sensitive receptors in the vicinity. Safety and traffic signs will be visibly placed on access roads near and around the project site.
- Information signs will be posted about situations that may threaten public health and emergency contact information will be available on the project area.
- Where necessary, measures and systems for cooperation with local communities and other external parties, including local government institutions and the media, will be implemented.
- Community representatives will be contacted to plan traffic taking into account the daily life of the community. Communities will be informed about the construction program, the activities to be carried out and the safety measures taken through appropriate means such as meetings, brochures, announcements, signage, etc.
- Compliance of contractor and subcontractor activities with legal regulations and the Project Owner's Environmental and Social Management System will be included in the contract terms.
- They will start work by signing the Code of Conduct document, including employees in the contractor and subcontractors. These documents will be drafted to include preventive measures for gender-based violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and discrimination.

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- The elimination of discrimination, child labor and forced labor will be ensured for all workers.
- Project employees will use the Workers' Grievance Mechanism (WGM) to raise concerns or suggestions regarding working conditions and workplace. WGM is defined as the mechanism that receives grievances from Project employees (including both direct and indirect employees).
- Employees will have a variety of ways to raise grievances. The grievance resolution will ideally involve the participation of the worker representative. To facilitate the process, workers will be provided with a grievance box where they can submit their wishes, requests and grievance forms.

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2 STAKEHOLDER ENGAGEMENT REQUIREMENTS

2.1 Overview

This Project-specific SEP is intended as a public document, open for discussion with stakeholders and subject to regular updates to reflect the results of ongoing engagement.

The SEP consists of the following components:

- Explanation of the objectives of the SEP,
- A brief description of the project,
- An overview of relevant stakeholder engagement standards, including World Bank requirements,
- A summary of previous stakeholder engagement activities undertaken by the Project to date,
- Identification and categorization of project stakeholders,
- Plan for future Stakeholder Engagements (focus, timing, target groups),
- Defining modalities for future engagement,
- Roles and responsibilities for effective implementation of the SEP,
- Grievance Mechanism to communicate and address complaints and feedback from external and internal stakeholders,
- Monitoring and reporting tools.

2.2 Applicable Guidelines and Standards

The SEP has been developed to comply with both national legal requirements and international standards. The main documents to be followed within the scope of national legislation are as follows:

- Constitution of the Republic of Türkiye
- Right to Information Act
- Right of Petition, Right to Information and Appeal to the Ombudsperson
- Personal Data Protection Law (KVKK)

TKYB announced its perspective on maintaining environmental and social sustainability and mitigating and managing negative impacts and risks arising from its operations to its stakeholders with the TKYB Environmental and Social Policy dated January 2020. This policy is taken as a basis in all services and activities financed by the Bank.

In addition, the “Environmental and Social Risk Evaluation Procedure in Credit Process”, which was prepared in order to evaluate the environmental and social risks of the requested loans and to ensure that the issue is managed effectively in line with the Bank's strategy, is implemented for each project.

The Project activities must be in compliance with good international industrial practices including IFC PSs, WBG ESSs WBG EHS Guidelines, and KfW Sustainability Guideline alongside the National EHS Legislation.

IFC's Performance Standards¹ within the World Bank Group (WBG) are aligned with the World Bank Environmental and Social Framework (ESF). Therefore, the scope will be presented

¹ International Finance Corporation. Performance Standards.2012.

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together with the WB Environmental and Social Standards (ESS). The relevant Performance Standards (PS) are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety, and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Biodiversity Conservation and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

The ESS² requirements detailed in the World Bank Environmental and Social Framework are as follows:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS2: Labor and Working Conditions
- ESS3: Resource Efficiency and Pollution Prevention and Management
- ESS4: Community Health and Safety
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
- ESS8: Cultural Heritage
- ESS9: Financial Intermediaries
- ESS10: Stakeholder Engagement and Information Disclosure

Other guidelines and principles are as follows:

- WBG General EHS Guidelines (2007)
- WBG EHS Guidelines: Electric Power Transmission and Distribution (2007)
- Equator Principles IV (2020)
- KfW Development Bank Sustainability Guideline, Assessment and Management of Environmental, Social and Climate Aspects: Principles and Procedures (31.07.2024)

The Project Owner's organizational policies and procedures are given as follows

- International Organization for Standardization (ISO) ISO 27001:2013 (Information Security Management System)
- ISO 50001:2018 (Energy Management System)
- Bilgin Energy Human Resources (HR) Policy
- Information Security Management System (ISMS) Policy

² World Bank Environmental and Social Framework. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

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2.2.1 National Requirements

2.2.1.1 Constitution of the Republic of Türkiye

According to the Constitution of the Republic of Türkiye³ and the Environmental Impact Assessment (EIA) Regulation dated 29.07.2022 and numbered 31907⁴, fundamental rights and freedoms, access to information, being informed about ongoing projects and stakeholder participation are guaranteed.

The requirements of the Constitution of the Republic of Türkiye are presented in relation to the Project's stakeholder engagement and disclosure processes in APPENDICES, Constitution of the Republic of Türkiye.

2.2.1.2 TKYB Requirements

The Bank's mission is to help structural transformation in line with sustainable development priorities by meeting the financing and advisory needs of investors, and to work to contribute to the spread of capital to the grassroots. In accordance with this purpose, the Bank's sustainability principles⁵ and their relationship with the Project are presented in APPENDICES, TKYB Requirements.

2.2.2 International Requirements

The IFC Performance Standards and World Bank Environmental and Social Standards are presented in APPENDICES, International Requirements in relation to the Project's stakeholder engagement and disclosure processes.

2.2.3 Applicable Policies and Practices of the Project Company

The Project Owner's corporate policies and procedures in relation to the Project's stakeholder engagement and disclosure processes are presented in APPENDICES, Bilgin Energy Certificates.

³ Ministry of Interior of the Republic of Türkiye. Constitution of the Republic of Türkiye.

<https://www.icisleri.gov.tr/kurumlar/icisleri.gov.tr/lcSite/illeridaresi/Mevzuat/Kanunlar/Anayasa.pdf>

⁴ Presidency of the Republic of Türkiye Legislation Information System. Environmental Impact Assessment Regulation.

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=39647&MevzuatTur=7&MevzuatTertip=5>

⁵ TKYB, Sustainability Principles.

<https://kalkinma.com.tr/en/about-us/environmental-development/environmental-and-social-policies>

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3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Methodology

Stakeholder engagement is a continuous and dynamic process that should be initiated prior to the development of this SEP and continue throughout the life of the project. The project proponent is committed to maintaining active and ongoing communication with identified stakeholders. The primary objective of the SEP is to provide stakeholders with prompt and adequate information on adverse impacts and risks associated with the project, while ensuring that they have comprehensive access to express their grievances and raise concerns. In particular, this commitment includes sharing information on social and environmental risks and adverse impacts and providing a channel for raising concerns and grievances.

Where significant changes to the Project occur, and where new risks and impacts arise that are likely to affect affected parties, the Project proponent will ensure that relevant information on these changes, risks and impacts is communicated to affected parties. In addition, the Project proponent will consult with affected parties to collaboratively develop strategies to mitigate these new risks and impacts.

This commitment to continuous engagement and transparent communication emphasizes the importance of addressing stakeholder concerns, ensuring accountability and adapting to changing circumstances for the benefit of the project and its stakeholders.

Stakeholders are individuals or groups or Other Interested Parties who may be directly or indirectly affected by a project.

In the World Bank's Environmental and Social Framework, under the standard "ESS10: Stakeholder Engagement and Information Disclosure", the topics that provide guidance for SEP are described in order.

These stakeholders are summarized as follows:

Project Affected People (PAP): This term refers to people who are likely to be exposed to impacts or potential risks to their physical environment, health, safety, cultural practices, well-being, livelihoods or otherwise as a result of the project. These stakeholders may be individuals or groups, including local communities.

Other Interested Parties (OIP): This term refers to individuals, groups or organizations with an interest in the project. This interest may arise from issues related to the location, characteristics, impacts or public interest of the project. Examples of such parties include regulators, government officials, the private sector, the scientific community, academics, trade unions, women's organizations, other non-governmental organizations and cultural groups.

Disadvantaged or Vulnerable Individuals or Groups (DVIG): This term refers to individuals or groups who are at higher risk of being adversely affected by the impacts of a project and who may face more constraints than others in enjoying the benefits of a project. Such individuals or groups are also more prone to exclusion from the normal consultation process or limitations in their ability to participate fully. As a result, they may need special measures and assistance for effective participation. This approach will take into account age-related factors, including both older people and minors, particularly where they may be separated from their families, communities or other individuals on whom they depend.

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3.2 Project Affected People and Other Interested Parties

Project Affected People (PAP) and Other Interested Parties (OIP) affected by the project will differ depending on the project phase.

The project aims to implement a SPP as an auxiliary source (hybrid) for the already operating Hacılar HEPP. The Project area and the existing facility are located in Darende district of Malatya province. The area where Hacılar HEPP is located is within Hacılar Şeyhli Neighborhood. The project area is within the borders of Hacılar Şeyhli Neighborhood, Baytarbağı Neighborhood and Çukurkaya Neighborhood. The nearby settlement to the Project area and the existing facility area is Hacılar Sıragöz Neighborhood. Environmental impacts during the construction and installation phases of the Project may affect the settlements in and near the Project area.

Table 3 provides definitions of stakeholders.

Table 3. Stakeholders of the Project

Stakeholders	PAP / OIP / DVIG	Relationship	Interest / Concern
Project Workers	PAP	Direct	Both Project management and contractor/subcontractor employees are the main stakeholders of the Project. Employees in the supply chain as well as employees of service providers should be included in all information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and WGM.
Disadvantaged Project Workers	DVIG	Direct	Persons with disabilities and individuals with chronic diseases who may be involved in the Project may be vulnerable to the Project's environmental impacts, OHS and traffic management. Migrants and employees with different languages who may be employed in the Project may be disadvantaged in terms of participation in information and consultation processes. Employees in the supply chain as well as employees of service providers should be included in all information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and WGM.
Hacılar Şeyhli Neighborhood Local Community	PAP	Direct	The Project area and the settlement where the existing facility is located. Questions and comments on Project activities (especially construction period) can be submitted. Participation in consultation should be ensured through the mukhtar. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.
Çukurkaya Neighborhood	PAP	Direct	It is the settlement where the Project area is located. Questions and comments on Project activities (especially construction period) can be

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Stakeholders	PAP / OIP / DVIG	Relationship	Interest / Concern
Local Community			submitted. Participation in consultation should be ensured through the mukhtar. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.
Baytarbağı Neighborhood Local Community	PAP	Direct	It is the settlement where the Project area is located. Questions and comments on Project activities (especially construction period) can be submitted. Participation in consultation should be ensured through the mukhtar. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.
Hacılar Sıragöz Neighborhood Local Community	PAP	Indirect	It is a settlement located near the Project area. Questions and opinions on Project activities (especially construction period) can be submitted. Participation in consultation should be ensured through the mukhtar. They should be continuously involved in consultation and information processes. They should be provided with information on the ESMP and sub-management plans, SEP and GM.
Hacılar Şeyhli Neighborhood Çukurkaya Neighborhood Baytarbağı Neighborhood Hacılar Sıragöz Neighborhood Mukhtar	OIP		It may be the official reference point for questions and comments from the local community on Project activities. It will therefore be able to generate interest in Project activities. The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darendе Municipality	OIP		The project is located within the borders of Darendе. It may be the official reference point for questions and comments from the local community on land use. Therefore, they may be interested in Project activities. The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darendе District Directorate of Agriculture and Forestry	OIP		It may be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities. The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darendе Chamber of Agriculture	OIP		It can be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities. The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.

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Stakeholders	PAP / OIP / DVIG	Relationship	Interest / Concern
Malatya Governorship Provincial Directorate of Environment, Urbanization and Climate Change	OIP		It may be the official reference point for questions and comments from the local community within the scope of Project activities. Therefore, they may be interested in the Project activities. The organization should be continuously involved in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Turkish Employment Agency (İŞKUR) Malatya Provincial Directorate	OIP		It is the institution that should provide cooperation in the local employment dimension of the Project. The organization should be included in consultation and information processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darende Women's Association	OIP		Non-Governmental Organization (NGO) that may be interested in the Project should be included in consultation and information processes. They should be informed about job opportunities. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darende Haber Gazetesi	OIP		As a media organ, it may be interested in Project activities. They should be included in information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.
Darende Postası	OIP		As a media organ, it may be interested in Project activities. They should be included in information and consultation processes. They should be provided with information on ESMP and sub-management plans, SEP and GM.

Within the scope of stakeholder interviews, opportunities for increasing women's employment in the region were discussed in the meeting held with Darende Women's Association. Darende Municipality has projects that encourage women's employment in the region. The association recommends supporting and strengthening these initiatives. In this context, the association representative stated that the Project owner could contact and cooperate with the association during the recruitment process.

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3.3 Vulnerable/Disadvantaged People and Groups

According to ESS10, Disadvantaged or Vulnerable Individuals or Groups (DVIG) include those who face barriers or difficulties in fully engaging with society or who are more susceptible to risks and vulnerabilities. These difficulties may arise from factors such as gender, economic status, social origin, age, disability or other conditions. Meeting their needs may require special assistance, support or protection measures to ensure their rights, well-being and access to equal opportunities.

The comprehensive methodology used to define the DVIG can be summarized as follows:

- Consideration of all interested or affected parties,
- Review all risks in the context of E&S, especially for vulnerable groups,
- Conducting stakeholder consultations prior to the project,
- Identify gaps, if any, between national and international standards,

As detailed in Methodology section, disadvantaged Project workers may be vulnerable to the Project due to noise, dust and exhaust gas emissions, traffic impacts, which are among the high risks of the Project identified for the construction period. These impacts will be seen at moderate and low levels during the operation period. In this sense, consultation with these vulnerable groups should be ensured to manage the high-risk impacts of the construction period.

The inclusion of disadvantaged Project workers is essential to manage the high risks identified for the construction period of the Project. It is imperative that these consultation meetings are completed prior to the start of the Project that they are introduced to the Project's contact information and grievance mechanism tools, and that they are provided with informative/orientation documents.

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4 PREVIOUSLY CARRIED OUT CONSULTATION ACTIVITIES AND OUTCOMES

Within the scope of the project, a meeting was organized with the participation of representatives of ÇINAR, Bilgin Energy and TKYB. This meeting was held on 09.01.2025 at the administrative building in Darende, Malatya. Social specialist, OHS specialist and environmental specialist from ÇINAR as Consultant, Hacilar HEPP Operation Manager, Project Coordinator and Administrative Supervisor from Bilgin Energy and social specialist and environmental specialist from TKYB attended this meeting.

Following the meeting, a site visit was organized on the same date to see the Project location and identify stakeholders.

Within the scope of promotion and information activities, communication was established with neighborhood mukhtars located near the Project area. Interviews were held with Darende Municipality, District Directorate of Agriculture and Forestry, Chamber of Agriculture and Women's Association. During these meetings, opinions and suggestions on the Project were received and ideas were exchanged on positive and negative environmental and social impacts.

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5 STAKEHOLDER ENGAGEMENT PROGRAMME AND DISCLOSURE PROCESS

In line with the findings and observations from the interviews, a Project-specific Stakeholder Engagement Plan (see Table 4) has been developed.

Sample Project Consultation Form and Sample Project Consultation Log recommended by TKYB may be used for consultations.

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Table 4. Stakeholder Engagement Plan

Main Topic	Timing	Identification of Stakeholders	Method used	Location	Frequency	Responsible Party
Identification of E&S and OHS risks and explanation of precautions	Pre-Construction	PAP Project workers	Information meeting Online meetings Surveys and feedback forms	Project area	Monthly	Bilgin Energy Project Management Contractor / Subcontractor representatives Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy Community Liaison Officer (CLO)
Identification of E&S and OHS risks and explanation of precautions	Pre-Construction	PAP, OIP, DVIG Stakeholders within the borders of Darende District and Hacilar Şeyhli, Çukurkaya, Baytarbağı and Hacilar Sıragöz Neighborhood	Information meeting Face-to-face public consultations Online meetings Open door meetings Surveys and feedback forms	Project area	Quarterly	Bilgin Energy Project Management Contractor / Subcontractor representatives Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy CLO
Grievance mechanism	Pre-Construction	PAP, OIP, DVIG All stakeholders	Announcement of the approved SEP on the website	Project area Online platform Website	Once	Bilgin Energy Project Management
Grievance mechanism	Pre-Construction	PAP Project workers	Information meetings Online meetings Surveys and feedback forms	Project area Online platform Website	Weekly	Bilgin Energy Project Management

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Main Topic	Timing	Identification of Stakeholders	Method used	Location	Frequency	Responsible Party
						Contractor / Subcontractor employee representatives
Grievance mechanism	Pre-Construction	PAP, OIP, DVIG Stakeholders within the borders of Darende District and Hacilar Şeyhli, Çukurkaya, Baytarbağı and Hacilar Sıragöz Neighborhoods	Orientation Face-to-face public consultations Online meetings Open door meetings Surveys and feedback forms	Project area Online platform Website	Once	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Discrimination and harassment GBV, SEA/SH	Pre-Construction	PAP Project workers	Information meetings Online meetings Surveys and feedback forms	Project area Online platform Website	Quarterly	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Identification of E&S and OHS risks and explanation of precautions	Construction	PAP Project workers	Information meeting Face-to-face public consultations Online meetings Open door meetings Surveys and feedback forms	Project area	Quarterly	Bilgin Energy Project Management Contractor / Subcontractor representatives Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy CLO
Identification of E&S and OHS risks and explanation of precautions	Construction	PAP, OIP, DVIG Stakeholders within the borders of Darende District and Hacilar Şeyhli, Çukurkaya,	Information meeting Face-to-face public consultations Online meetings Open door meetings	Project area	Semi-Annual	Bilgin Energy Project Management Contractor / Subcontractor representatives

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Main Topic	Timing	Identification of Stakeholders	Method used	Location	Frequency	Responsible Party
		Baytarbağı and Hacılar Sıragöz Neighborhood	Surveys and feedback forms			Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy CLO
Grievance mechanism	Construction	PAP, OIP, DVIG All stakeholders	Announcement of revised SEP if necessary	Project area Online platform Website	Once	Bilgin Energy Project Management
Grievance mechanism	Construction	PAP Project workers	Information meetings	Project area Online platform Website	Monthly	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Grievance mechanism	Construction	PAP, OIP, DVIG Stakeholders within the borders of Darende District and Hacılar Şeyhli, Çukurkaya, Baytarbağı and Hacılar Sıragöz Neighborhood	Orientation Face-to-face public consultations Online meetings Open door meetings Surveys and feedback forms	Project area Online platform Website	Quarterly	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Discrimination and harassment GBV, SEA/SH	Construction	PAP Project workers	Information meetings Online meetings Surveys and feedback forms	Project area Online platform Website	Semi-Annual	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Identification of E&S and OHS risks and explanation of precautions	Operation	PAP Project workers	Information meeting Face-to-face public consultations Online meetings Open door meetings	Project area	Annual	Bilgin Energy Project Management

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Main Topic	Timing	Identification of Stakeholders	Method used	Location	Frequency	Responsible Party
			Surveys and feedback forms			Contractor / Subcontractor representatives Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy CLO
Identification of E&S and OHS risks and explanation of precautions	Operation	PAP, OIP, DVIG Stakeholders within the borders of Darende District and Hacilar Şeyhli, Çukurkaya, Baytarbağı and Hacilar Sıragöz Neighborhood	Information meeting Face-to-face public consultations Online meetings Open door meetings Surveys and feedback forms	Project area	Annual	Bilgin Energy Project Management Contractor / Subcontractor representatives Bilgin Energy Environmental Engineer Bilgin Energy OHS Specialist Bilgin Energy CLO
Grievance mechanism	Operation	PAP, OIP, DVIG All stakeholders	Announcement of revised SEP if necessary	Project area Online platform Website	Once	Bilgin Energy Project Management
Grievance mechanism	Operation	PAP Project workers	Information meetings	Project area Online platform Website	Semi-annual	Bilgin Energy Project Management Contractor / Subcontractor employee representatives
Grievance mechanism	Operation	PAP, OIP, DVIG Stakeholders within the borders of	Orientation Face-to-face public consultations	Project area Online platform	Annual	Bilgin Energy Project Management

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Main Topic	Timing	Identification of Stakeholders	Method used	Location	Frequency	Responsible Party
		Darende District and Hacılar Şeyhli, Çukurkaya, Baytarbağı and Hacılar Sıragöz Neighborhood	Online meetings Open door meetings Surveys and feedback forms	Website		Contractor / Subcontractor employee representatives
Discrimination and harassment GBV, SEA/SH	Operation	PAP Project workers	Information meetings Online meetings Surveys and feedback forms	Project area Online platform Website	Annual	Bilgin Energy Project Management Contractor / Subcontractor employee representatives

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6 PROJECT GRIEVANCE MECHANISM

6.1 Overview

The contact information of Bilgin Güç Santralleri Enerji Üretim A.Ş. head office is given below:

Address : Kuleli Sokak No: 87 06700 Gazi Osman Paşa Çankaya/ANKARA
Phone : 0312 446 30 23
E-Mail : contact@bilgin.com.tr
Website : <https://www.bilgin.com.tr/en>

Internal and external stakeholders (including foreigners) can also apply to the following national-level GMs:

Presidential Communication Center (CİMER) provides a centralized grievance system for Turkish citizens, legal entities and foreigners. CİMER will serve as an alternative and well-known channel through which Project stakeholders can submit Project-related complaints and feedback directly to government authorities. In addition, under the Right to Information Law, every individual has the right to access information in accordance with the procedures and principles set out in the written regulations. This can be realized through the Right to Petition or by submitting a written request online at (<https://www.icisleri.gov.tr/bilgi-edinme>). Contact information for CİMER is provided below:

- Website: www.cimer.gov.tr
- Call Center: 150
- Telephone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to the Communications Directorate of the Republic of Türkiye
- Individual applications to public relations desks in governorships, ministries and district governorships.

Foreigners Communication Center (YİMER) provides a centralized grievance system for foreigners. YİMER will serve as an alternative and well-known channel for Project stakeholders to submit Project-related complaints and feedback directly to government authorities. Contact information for YİMER is provided below:

- Website: www.yimer.gov.tr
- Call Center: 157
- Telephone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to the Communications Directorate of the Republic of Türkiye
- Individual application to the Directorate General of Migration Management of the Republic of Türkiye

6.2 Principles of the Grievance Mechanism

The main purpose of the grievance mechanism is to help resolve grievances and requests in a timely, effective and efficient manner to the satisfaction of all parties involved. The GM (and also the WGM) will be effective throughout the life of the project. This mechanism is intended to serve the following:

- Allowing issues affecting the project to be identified and resolved in an impartial, timely and effective manner,

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- Strengthening accountability of beneficiaries, including project-affected stakeholders,
- Providing channels for stakeholders to provide feedback and raise concerns,
- Providing an open, transparent, culturally sensitive and easily accessible consultation process,
- Providing the option for anonymous complaints and feedback, particularly in cases of Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH),

Recognize that complaints about public health, safety and environmental risks can be urgent, particularly in cases of accidents, infectious diseases and pollution. Urgent measures will be taken to identify and prevent further damage.

6.3 External Grievance Mechanism

All stakeholders can submit individual applications to the GM established specifically for the Project in the ways provided.

To implement the GM, Bilgin Energy and the contractor's Community Liaison Officer (CLO) will actively follow the grievances made by stakeholders. They will collaborate with relevant units to resolve these issues and register grievances with the GM.

Forms to be created by Bilgin Energy in the form of Request, Grievance and Suggestion forms.

It will be summarized in the explanation section categorized here. Signature and personal information will be requested upon request (See Sample Project Grievance Register Form).

Feedback received through the registration form will be classified and archived using the grievance log (See Sample Project Grievance Log).

Closure forms are the last stage of these logs. Notes for corrective actions will be created here (See Sample Project Grievance Closure Form).

6.4 Internal Grievance Mechanism

There is a Code of Conduct document established by the project management and this document is binding for all project employees, including contractor/subcontractor.

Grievance and suggestion boxes will be located within the Project area.

Project employees will use the WGM to raise concerns or suggestions regarding working conditions and the workplace. WGM is defined as the mechanism to receive grievances from Project workers (including both direct and indirect workers).

Workers will be informed about the possibility of submitting project-related grievances on GBV and SEA/SH issues anonymously. Grievance-handling authorities should ensure the confidentiality of the aggrieved party and apply an impartial approach when handling such matters.

Grievances about GBV and SEA/SH should be segregated and reported to relevant institutions. Confidentiality and ethical filing of GBV and SEA/SH grievances should be observed to protect the victim, prevent disclosure of shared information and avoid creating new challenges.

6.5 Grievance Mechanism Channels and CLO Contact Details

A customized website and communication network will be defined for Hacılar HEPP Hybrid SPP Project to be constructed by Bilgin Güç Santralleri Enerji Üretim A.Ş. Open and transparent contact addresses will be announced on the website given above.

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The company will appoint a CLO to work in the region.

Contact information of the appointed CLO will also be announced on this page.

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7 RESOURCES AND ROLES&RESPONSIBILITIES

Expenses or costs incurred in carrying out SEP-related activities will be financed or paid using the budget provided by Bilgin Energy.

The funds needed to cover these costs will come from the budgets allocated by Bilgin Energy for this purpose.

Information and disclosure methods include printed and online information documents and consultations. These may include the following:

- Promotional documents produced in the form of brochures, posters, flyers, etc. containing up-to-date information about the project, contractor and facility and containing short informative notes
- Bilgin Energy's official website where relevant documents are available online
- Current announcements on Bilgin Energy's official website
- Notice boards with warnings and information notes on occupational and environmental health, safety and security as well as waste management will be placed in and around the facility
- Request, complaint and suggestion boxes to be placed in and around the facility
- Regular consultation meetings with local and regional institutions and organizations

The Project Owner will provide information about the Project to all Project-affected parties, in particular affected settlements, local residents, local government agencies and their workforce, and will be involved in the identification of key Project issues. For stakeholder engagement activities, the main administrative responsibilities and responsibilities for relevant stakeholders are summarized below with Table 5.

Table 5. Roles and Responsibilities

Responsible Organization	Roles and Responsibilities
Bilgin Energy Project Management	Planning and implementation of SEP activities Announcement of SEP related activities Reporting of SEP related activities Proper implementation of the grievance mechanism defined in the SEP and follow-up on the overall implementation status
CLO	Planning and implementation of SEP activities in close cooperation with Bilgin Energy Project Management Publicizing SEP-related activities Reporting of SEP related activities Proper implementation of the grievance mechanism defined in the SEP and follow-up on the overall implementation status
Environmental Specialist	Participant information process Participatory solution process
OHS Specialist	Participant information process Participatory solution process
Monitoring and Evaluation	Monitoring the logging and resolution of grievances and reporting to Bilgin Energy Project Management Reporting to Bilgin Energy Project Management on the implementation of SEP activities
Contractor	Informing Bilgin Energy Project Management on any issues related to their interactions with stakeholders. Informing Bilgin Energy Project Management for environmental and social issues (e.g. noise, dust, traffic, community health and safety, etc.) Develop and implement a GM for both the project's E&S performance and for employees, including subcontractors, prior to the start of work in accordance with GM requirements

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8 MONITORING AND REPORTING

SEP Monitoring Reports will be prepared monthly by the Contractor and submitted to Bilgin Energy Management.

The project proponent also commits to maintain transparent lines of communication with relevant stakeholders as the situation requires. Newly identified stakeholders will be added to the stakeholder list with immediate initiation of communication. In the event of significant changes or updates to the project, the project proponent will continue to communicate and disseminate information on environmental and social concerns to relevant stakeholders. Improvements, updates and notifications on environmental and social issues will be communicated promptly in accordance with the procedures set out in this SEP.

The SEP will be subject to periodic revisions, especially if significant changes occur in the project. These revisions will provide brief summaries of concerns, issues and questions raised in the previous year, together with details on deviations from originally planned activities or events.

The SEP will be updated regularly as required throughout the project duration. The worker responsible for it will compile periodic reports on stakeholder complaints and inquiries, including the status of corrective actions. These quarterly reports will help assess the number and types of issues and the Project's ability to address them effectively. Information on the Project's public participation activities may be shared with stakeholders through various communication channels as needed.

Table 6 has been prepared to provide a comprehensive overview of GM monitoring and reporting processes. The table defines Key Performance Indicators (KPIs) and identifies the responsible parties assigned with this task.

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Table 6. Monitoring Plan

KPIs		Requirements	Items Used for Monitoring	Project Phase and Frequency		Responsible Parts for Monitoring	Items used for reporting	Project Phase and Frequency		Responsible Parts for Reporting
KPI-01	Recording all written and verbal feedback Records will also include anonymous complaints The registers will show the number of both open and closed complaints. Recording the actions taken for closed complaints. Record minutes of meetings (MoM) and training (date, topic, number of participants) Photographs (if permissions are obtained) Complaint Records Assessment of the social appropriateness of project implementations	Establishment of a project-specific GM Establishment of a Project Specific Worker GM Preparation of complaint forms Evaluation of employee GM records	Routine field visits Random face-to-face interviews with stakeholders Focus group discussion with vulnerable groups Remote consultations with vulnerable groups	Once before project activities	Pre-Construction	Bilgin Energy Management	Distribution of records according to feedback types such as concerns, complaints, questions and suggestions. Number of complaints closed Number of open and ongoing complaints List of actions to close the complaint	No term	Pre-Construction	Contractor CLO

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KPIs		Requirements	Items Used for Monitoring	Project Phase and Frequency		Responsible Parts for Monitoring	Items used for reporting	Project Phase and Frequency		Responsible Parts for Reporting
KPI-02	Appointment of CLO Forwarding complaints to relevant units	Ensuring appropriate staffing for stakeholder engagement, including vulnerable groups	Regular meetings with CLO	Continuous	Pre-Construction	Bilgin Energy Management	Monthly, quarterly and semi-annual reports of CLO Documentation of consultation, including litigation, if any	Continuous	Pre-Construction	Contractor CLO
				Weekly	Construction			Semi-Annual	Construction	
				Monthly	Operation			Annual	Operation	
KPI-03	Recording all written and verbal feedback The records also include anonymous complaints.	Creation of all types of accessible communication tools Consideration of language-based barriers for all types of communication techniques Provision of a living document form used in the information process Establishing an on-site public relations office Conducting stakeholder consultations	Routine field visits Random face-to-face interviews with stakeholders Focus group discussion with vulnerable groups Remote consultations with vulnerable groups	Continuous	Pre-Construction	Bilgin Energy Management	Distribution of registrations by stakeholder types, including vulnerable groups Breakdown of records by additional language use, if required	Continuous	Pre-Construction	Contractor CLO
				Weekly	Construction			Semi-Annual	Construction	
				Monthly	Operation			Annual	Operation	

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KPIs		Requirements	Items Used for Monitoring	Project Phase and Frequency		Responsible Parts for Monitoring	Items used for reporting	Project Phase and Frequency		Responsible Parts for Reporting
KPI-04	Monitoring the contractor's activities related to GM	Ensure monitoring of the contractor's activities	Regular meetings with CLO	Monthly	Pre-Construction	Bilgin Energy Management	Records prepared by the Contractor's representative during the GM process Number of closed grievances registered by the contractor Number of open and ongoing grievances logged by the contractor List of actions implemented by the Contractor to close the registered complaint Quarterly, semi-annual and annual reports of the contractor's representative.	Monthly	Pre-Construction	Contractor CLO
				Quarterly	Construction			Quarterly	Construction	
				Semi-Annual	Operation			Semi-Annual	Operation	

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9 APPENDICES

9.1 Sample Project Consultation Form

		CONSULTATION FORM		
Person Filling Out the Form		Date		
Meeting Agenda		Consultation Register Number		
1- Meeting Information				
Name of Authorized Person			Type of Communication	
Institution Consulted			<input type="checkbox"/> Face-to-Face	
Phone/Email			<input type="checkbox"/> Phone	
Village/District/Province			<input type="checkbox"/> Other	
Type of Stakeholder				
<input type="checkbox"/> Public Institution	<input type="checkbox"/> PAP	<input type="checkbox"/> Association/NGO	<input type="checkbox"/> Related Group	<input type="checkbox"/> Chamber / Professional Body
<input type="checkbox"/> Contractor / Subcontractor	<input type="checkbox"/> Labour Union	<input type="checkbox"/> Media	<input type="checkbox"/> University	<input type="checkbox"/> Other
2- Details of the Consultation				
Subject				
Feedback				
Note				

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9.2 Sample Project Consultation Log

Stakeholder Type	Institution Consulted	Stakeholder	Gender	Phone	Communication Channel	Date	Agenda Of the Meeting	Number Of Stakeholders Engaged	Team	Person Filling Out the Form	Details of the Consultation

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9.3 Sample Project Grievance Register Form

Full Name	
Contact Information	By Post: Please provide mailing address.
Please identify how you wish to be contacted (mail, telephone, e-mail)	By telephone:
	By e-mail:
Preferred language of communication?	Turkish Other.....
Description of incident or grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem?):	
Date of incident/grievance	
	One time incident/grievance (date _____)
	Happened more than once (how many times? ____)
	On-going (currently experiencing problem)
What would you like to see to resolve this problem?	
Internal Use Only	
Grievance received by:	
Date:	
Reference number:	

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9.4 Sample Project Grievance Log

No	Date received	Name/ Anonymous	Type of grievance	Classification	Brief description	Person responsible for follow-up	Actions taken	Date resolved	Action taken to avoid future similar grievances

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9.5 Sample Project Grievance Closure Form

Name of the Recorder:		
Date of Register:	/...../.....
GRIEVANCE/REQUEST CLOSURE		
<p>In this section of the Closing Form, information on how the grievance was resolved or how the request was met will be included; if there is an expenditure made, its information will be entered; an explanation that the grievance/request is agreed with the grievance/request owner will be written and signed by grievance or request owner and the relevant Client employee and closed.</p> <p>(For grievances received over the Internet, an e-mail response will be expected instead of a signature)</p>		
Actions Taken for Grievance/Request	Relevant Departments /Contractors/ Subcontractors	
1-		
2-		
3-		
4-		
Amount of Expenditure:		
Grievance/Requestor Name and Surname	On behalf of Client Title-Name-Surname and Signature	

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9.6 National and International Requirements

9.6.1 Constitution of the Republic of Türkiye

Article	Requirements	Stakeholder Engagement Aspect
Preamble	That every Turkish citizen has an innate right and power, to lead an honorable life and to improve his/her material and spiritual wellbeing under the aegis of national culture, civilization, and the rule of law, through the exercise of the fundamental rights and freedoms set forth in this Constitution, in conformity with the requirements of equality and social justice.	<ul style="list-style-type: none"> Protecting the principle of equality and social justice in stakeholder engagement.
Article 10	Everyone is equal before the law without distinction as to language, race, color, sex, political opinion, philosophical belief, religion and sect, or any such grounds No privilege shall be granted to any individual, family, group or class.	<ul style="list-style-type: none"> Acting against all forms of discrimination in stakeholder engagement.
Article 12	Everyone possesses inherent fundamental rights and freedoms, which are inviolable and inalienable.	<ul style="list-style-type: none"> Protection of personal rights in stakeholder relations.
Article 17	Everyone has the right to life and the right to protect and improve his/her corporeal and spiritual existence.	<ul style="list-style-type: none"> Protection of personal rights in stakeholder relations.
Article 20	Everyone has the right to demand respect for his/her private and family life. Privacy of private or family life shall not be violated. Everyone has the right to request the protection of his/her personal data. This right includes being informed of, having access to and requesting the correction and deletion of his/her personal data, and to be informed whether these are used 29 in consistency with envisaged objectives. Personal data can be processed only in cases envisaged by law or by the person's explicit consent. The principles and procedures regarding the protection of personal data shall be laid down in law.	<ul style="list-style-type: none"> Protection of personal data obtained in stakeholder relations, keeping it confidential and using it anonymized only when necessary. Requesting information in stakeholder relations only with the consent of the person and organization. Obtaining confidential recordings/photographs without the consent of the person and/or organization and preventing their publication.
Article 22	Everyone has the freedom of communication. Privacy of communication is fundamental.	<ul style="list-style-type: none"> In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project. Keeping confidential the contact information to which requests, suggestions, complaints and questions from stakeholders are forwarded.
Article 24	Everyone has the freedom of conscience, religious belief and conviction.	<ul style="list-style-type: none"> Preventing any discrimination against stakeholders while expressing themselves and giving equal and fair chances to all stakeholders.

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Article	Requirements	Stakeholder Engagement Aspect
Article 25	Everyone has the freedom of thought and opinion.	<ul style="list-style-type: none"> Preventing any discrimination against stakeholders while expressing themselves and giving equal and fair chances to all stakeholders.
Article 26	Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively.	<ul style="list-style-type: none"> Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression.
Article 27	Everyone has the right to study and teach, express, and disseminate science and the arts, and to carry out research in these fields freely.	<ul style="list-style-type: none"> In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project.
Article 40	Everyone whose constitutional rights and freedoms have been violated has the right to request prompt access to the competent authorities.	<ul style="list-style-type: none"> Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities. Reminding that in case of complaints, especially from internal stakeholders, remedies to legal authorities other than the internal GM are open.
Article 48	Everyone has the freedom to work and conclude contracts in the field of his/her choice.	<ul style="list-style-type: none"> Ensuring equal information opportunities when announcing employment opportunities Consultations with stakeholders on equal opportunities and non-discrimination in employment Informing all internal stakeholders about contract and labor rights.
Article 50	No one shall be required to perform work unsuited to his/her age, sex, and capacity.	<ul style="list-style-type: none"> Conduct internal GM including subcontractors and subcontractors to prevent forced labor, child labor and modern slavery. Informing stakeholders about the concepts of forced labor, child labor and modern slavery Informing all Project employees (all internal stakeholders), including subcontractors and subcontractors, about their contractual and labor rights.
Article 51	Employees and employers have the right to form unions and higher	<ul style="list-style-type: none"> Informing all internal stakeholders about the contract

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Article	Requirements	Stakeholder Engagement Aspect
	organizations, without prior permission, and they also possess the right to become a member of a union and to freely withdraw from membership, in order to safeguard and 48 develop their economic and social rights and the interests of their members in their labour relations. No one shall be forced to become a member of a union or to withdraw from membership.	<ul style="list-style-type: none"> and labor and union rights. Conducting internal GM to ensure that barriers restricting contract and trade union rights are eliminated.
Article 53	Workers and employers have the right to conclude collective labour agreements in order to regulate reciprocally their economic and social position and conditions of work.	<ul style="list-style-type: none"> Informing both employers and employees about their rights Conducting internal GM to protect both employers and employees
Article 55	Wages shall be paid in return for work. The state shall take the necessary measures to ensure that workers earn a fair wage commensurate with the work they perform and that they enjoy other social benefits.	<ul style="list-style-type: none"> Conduct internal GM including subcontractors and subcontractors to prevent forced labor and modern slavery Ensuring equal work and working conditions in a way that does not allow discrimination among employees Informing subcontractors and subcontractors about working hours, wages, overtime, compensation and social rights to prevent forced labor and modern slavery
Article 56	Everyone has the right to live in a healthy and balanced environment.	<ul style="list-style-type: none"> Ensuring equal work and working conditions in a way that does not allow discrimination among employees Informing subcontractors and subcontractors about working hours, wages, overtime, compensation and social rights to prevent forced labor and modern slavery
Article 60	Everyone has the right to social security.	<ul style="list-style-type: none"> Ensuring equal work and working conditions in a way that does not allow discrimination among employees Informing both employers and employees about their rights
Article 74	Citizens and foreigners resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public.	<ul style="list-style-type: none"> Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression

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Article	Requirements	Stakeholder Engagement Aspect
Article 148	Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities.	<ul style="list-style-type: none"> Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities. Reminding that in case of complaints, especially from internal stakeholders, remedies to legal authorities other than the internal GM are open
Right to Information Act	Article 11 – The institutions shall provide the required information within 15 working days. However, where the required information or document is to be obtained from another unit within the applied institution or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In such case, the applicant will be notified of the extension and its reasons within 15 working days.	<ul style="list-style-type: none"> The stakeholder engagement plan is prepared to directly inform stakeholders.
Right of Petition, Right to Information and Appeal to the Ombudsperson	Citizens have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to requests and complaints concerning themselves or the public. The result of the application concerning himself shall be made known to the petitioner in writing.	<ul style="list-style-type: none"> Stakeholders were informed that they can submit their grievances about the Project either to the Project owner through the GM or directly to the relevant authorities.
Personal Data Protection Law	The Law on the Protection of Personal Data in Türkiye, also known as KVKK, regulates the processing of personal data to protect the privacy of individuals. The Law defines the roles of data controllers and data processors, requires consent for data processing and mandates purpose limitation. The Law grants individuals' rights over their data and imposes obligations for data security. It regulates international data transfers and requires notification of data breaches. An independent Data Protection Authority monitors and enforces compliance with the law. It is recommended to consult the most up-to-date legal sources for the most up-to-date details.	<ul style="list-style-type: none"> Stakeholders will have the right to present themselves anonymously. Personal data of any stakeholder involved in the process.

9.6.2 TKYB Requirements

No	Principles	Stakeholder Engagement Dimension
1	Considering the direct and indirect environmental and social impacts that may arise	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods

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No	Principles	Stakeholder Engagement Dimension
		<ul style="list-style-type: none"> Informing stakeholders in case of possible pollution Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes
2	Environmental and social risk assessment should be part of routine decision-making in all investment and lending practices	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods Informing stakeholders in case of possible pollution Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes
3	Regularly monitor negative environmental and social impacts and minimize them while increasing positive environmental and social activities	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods Informing stakeholders in case of possible pollution Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes
4	Support capacity building as a sustainability requirement	<ul style="list-style-type: none"> Involving all stakeholders during construction and operation Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes
5	Seeing cooperation with all stakeholders as essential for sustainable success and developing opportunities for cooperation	<ul style="list-style-type: none"> In stakeholder interaction, preparing the necessary environment for stakeholders to access the information they want about the Project Involving all stakeholders during construction and operation Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes
6	Regularly measure and monitor greenhouse gas emissions and resource consumption and set targets to improve resource and energy efficiency	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods
7	Commitment to the United Nation Sustainable Development Goals	<ul style="list-style-type: none"> Involving all stakeholders during construction and operation Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods
8	Embracing the fight against climate change and sharing it with stakeholders through the Combating Climate Change Adaptation Policy	<ul style="list-style-type: none"> Involving all stakeholders during construction and operation Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods
9	Providing a working environment that respects human rights and ensures justice, equality and trust, and raising awareness among its customers	<ul style="list-style-type: none"> Protecting the principle of equality and social justice in stakeholder engagement Acting against all forms of discrimination in stakeholder engagement

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No	Principles	Stakeholder Engagement Dimension
		<ul style="list-style-type: none"> Preventing any discrimination against stakeholders while expressing themselves and giving equal and fair chances to all stakeholders Encouraging and reminding stakeholders to communicate their thoughts and opinions. In particular, reminding internal stakeholders of their constitutional rights and freedoms and encouraging expression Organizing special meetings for women, poor and disabled people and developing different information methods for these vulnerable groups Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions Including all internal stakeholders in the information, training and participation processes during the construction period and operation period Informing all stakeholders about and providing access to the GM during the construction period and operation period.
10	Providing fair and equal opportunities within the scope of Human Resources Regulation	<ul style="list-style-type: none"> Informing internal stakeholders about occupational health and safety Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions Including all internal stakeholders in the information, training and participation processes during the construction period and operation period Establishing employee codes of conduct and raising awareness on this issue Informing all internal stakeholders about the prevention of forced labor and child labor during construction and operation period Informing all internal stakeholders about the principles of freedom of association and collective bargaining during the construction and operation period and providing an appropriate environment Informing all internal stakeholders about and providing access to the GM during the construction period and operation period.
11	Adopting a zero-tolerance policy against bribery and corruption and acting within the framework of the Anti-Bribery and Anti-Corruption Policy	<ul style="list-style-type: none"> Implementation of an open and transparent management system
12	Providing a healthy and safe working environment for staff within the scope of legal legislation and practices related to occupational health and safety	<ul style="list-style-type: none"> Informing internal stakeholders about occupational health and safety
13	To follow a fair and transparent communication policy in communication activities	<ul style="list-style-type: none"> Involving all stakeholders during construction and operation Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions Organizing special meetings for women, poor and disabled people and

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No	Principles	Stakeholder Engagement Dimension
		<ul style="list-style-type: none"> developing different information methods for these vulnerable groups Including all internal stakeholders in the information, training and participation processes during the construction period and operation period
14	Communicate timely and accurate information to its stakeholders through the right channels and establish communication channels (written, visual and social media) to receive feedback from its main stakeholders and understand their priorities and needs	<ul style="list-style-type: none"> The Project's stakeholders and their level of interest and support are defined in the Scope section. Stakeholders are informed about environmental and social risks in a timely manner Consultations with stakeholders to mitigate risks and increase positive activities in disclosure processes are defined under this SEP.
15	Adopt an effective governance model to develop, implement, manage and monitor sustainability activities and support the implementation and continuous improvement of corporate sustainability management at the level of international sustainability standards.	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes

9.6.3 International Requirements

No	ESS / PS	Requirements	Stakeholder Engagement Aspect
ESS1 PS1	Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> Identify, assess and manage the environmental and social risks and impacts of the project Take differentiated measures for disadvantaged or vulnerable groups and include them in opportunities Use national level environmental and social regulations and procedures where appropriate 	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner during construction and operation periods Organizing special meetings for women, poor and disabled people and developing different information methods for these vulnerable groups Fulfillment of the requirements stated in the current EIA Regulation, especially Article 9 under the title of "Public information and public participation meeting"
ESS2 PS2	Labor and Working Conditions	<ul style="list-style-type: none"> Promoting safety and health at work Promote fair treatment, freedom and equal opportunity among project employees Protecting vulnerable, disadvantaged and vulnerable (women, persons with disabilities, etc.) project workers, including migrant workers, contract workers, community workers and primary supply chain workers To prevent the use of all forms of forced labor and child labor. 	<ul style="list-style-type: none"> Informing internal stakeholders about occupational health and safety Recognizing equal opportunities locally and regionally in recruitment and announcement of working conditions Establishing employee codes of conduct and raising awareness on this issue Including all internal stakeholders in the information, training and participation processes during the

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No	ESS / PS	Requirements	Stakeholder Engagement Aspect
		<ul style="list-style-type: none"> Promote the principles of freedom of association and collective bargaining for project workers in accordance with national law Providing project workers with accessible tools to raise workplace concerns 	<p>construction period and operation period</p> <ul style="list-style-type: none"> Informing and raising awareness of all internal stakeholders about the prevention of forced labor and child labor during construction and operation period Informing and raising awareness of all internal stakeholders about harassment and discrimination in the workplace during construction and operation Informing and raising awareness among all internal stakeholders about gender-based discrimination and harassment in the workplace during construction and operation Informing all internal stakeholders about the principles of freedom of association and collective bargaining during the construction period and operation period and providing an appropriate environment Informing all internal stakeholders about and providing access to the GM during the construction period and operation period.
ESS3 PS3	Resource Efficiency and Pollution Prevention	<ul style="list-style-type: none"> Promote the sustainable use of resources, including energy, water and raw materials To prevent or minimize adverse impacts on human health and the environment by preventing or minimizing pollution from project activities Avoid or minimize project-related emissions of short- and long-lived climate pollutants Prevent or minimize the generation of hazardous and non-hazardous waste to minimize and manage the risks and impacts associated with pesticide use 	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes Informing stakeholders in case of possible pollution Informing stakeholders in case of risk related to possible chemical use
ESS4 PS4	Community Health and Safety	<ul style="list-style-type: none"> Anticipate and prevent adverse impacts on the health and safety of project-affected communities throughout the project life cycle Promote quality and safety and climate change considerations in the design and construction of infrastructure Prevent or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous substances 	<ul style="list-style-type: none"> Stakeholders are informed about environmental and social risks in a timely manner Consultations with stakeholders on reducing risks and increasing positive activities in disclosure processes

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No	ESS / PS	Requirements	Stakeholder Engagement Aspect
		<ul style="list-style-type: none"> Taking effective measures to address emergency incidents Ensure that protection of personnel and property is carried out in a manner that avoids or minimizes risks to project-affected communities 	
ESS5 PS5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	<ul style="list-style-type: none"> Preventing forced resettlement and, in case of necessity, minimizing forced resettlement by evaluating Project design alternatives. 	<ul style="list-style-type: none"> There will be no land use outside the area determined within the scope of the Project. Economic and physical resettlement will not be implemented under the Project. If the Project falls within the scope of Land Use Restrictions and Mandatory Resettlement, the SEP will need to be revised in accordance with ESS5.
CSS6 PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> Apply the mitigation hierarchy and precautionary approach in the design and implementation of projects that may have an impact on biodiversity 	<ul style="list-style-type: none"> There will be no land use outside the boundaries of the area determined within the scope of the Project. Within the scope of the Project, there are no studies conducted to identify biodiversity, living and natural resources. In the event that areas that comply with the requirements stated in ESS6 are identified through specific surveys, institutional opinions, literature reviews or remote sensing methods, the SEP will need to be revised in accordance with ESS6.
CSS7 PS7	Indigenous Peoples / Sub-Saharan Africa Historically Underserved Traditional Local Communities	<ul style="list-style-type: none"> Ensure that the development process promotes full respect for the human rights, dignity, identity, culture and natural resource-based livelihoods of Indigenous Peoples / Historically Under-Served Traditional Local Communities of Sub-Saharan Africa. 	<ul style="list-style-type: none"> This standard is out of scope for projects implemented in Türkiye as no communities with indigenous characteristics as defined under ESS7 are located within the borders of the country.
CSS8 PS8	Cultural Heritage	<ul style="list-style-type: none"> Protect cultural heritage from the negative impacts of project activities and support its conservation Addressing cultural heritage as an integral part of sustainable development Promote meaningful consultations with cultural heritage stakeholders Promote the equitable sharing of benefits from the use of cultural heritage 	<ul style="list-style-type: none"> There will be no land use outside the boundaries of the area determined within the scope of the Project. Within the scope of the Project, no studies have been conducted to identify the existence of movable or immovable (tangible) and/or intangible cultural heritage items. In case the areas mentioned in ESS8 are identified in the future through specific surveys, institutional opinions and literature reviews, the SEP will need to be revised in accordance with ESS8.

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No	ESS / PS	Requirements	Stakeholder Engagement Aspect
CSS9	Financial Intermediaries (FA)	<ul style="list-style-type: none"> Identify how the FA will assess and manage the environmental and social risks and impacts associated with the sub-projects it finances Promote good environmental and social management practices in FA finance subprojects Promote good environmental and sound human resource management within the FA 	<ul style="list-style-type: none"> As this Project is not a project carried out by intermediary Banks (Financial Intermediaries), the relevant standard is out of scope for this Project.
CSS10 <i>PS1.5</i> <i>PS1.25</i> <i>PS1.26</i> <i>PS1.27</i> <i>PS1.29</i> <i>PS1.30</i> <i>PS1.35</i> <i>PS5.10</i> <i>PS6.6</i> <i>PS6.24</i> <i>PS7.5</i>	Stakeholder Engagement and Information Disclosure	<ul style="list-style-type: none"> Identification of the stakeholders of the project Determining the level of stakeholder interest and support Consideration of stakeholder views in environmental and social practices Encouraging stakeholders to interact throughout the project cycle Ensure that environmental and social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format Provide accessible and inclusive means to raise issues and grievances and enable them to be responded to and managed. 	<ul style="list-style-type: none"> The Project's stakeholders and their level of interest and support are described in the Scope section. Stakeholders are informed about environmental and social risks in a timely manner Consultations with stakeholders on mitigating risks and enhancing positive activities in disclosure processes are defined in the SEP.

9.6.4 Bilgin Energy Certificates

Document Name	Stakeholder Engagement Dimension
ISO 27001:2013 (Information Security Management System)	Determining information security strategies, ensuring compliance with standards
	Establishing energy management strategies and setting energy efficiency targets
	Training and awareness raising on energy efficiency
ISO 50001:2018 (Energy Management System)	Ensuring employee participation
	Reflecting information security requirements in the supply chain
	Ensuring stakeholder trust

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Document Name	Stakeholder Engagement Dimension
	Risk management
Human Resources Policy	Improving the quality of labor force Improving service quality HR planning Determination of personnel needs Recruitment Orientation Trial period Performance monitoring Periodic evaluation Assignment Termination of employment Social rights management Health checks
Information Security Management System Policy	Determining, implementing and maintaining information security policy Providing training to employees Specifying information security requirements in contracts with suppliers Informing customers about the steps taken to ensure the security of their data Collecting regular feedback from internal and external stakeholders Using feedback for improvement