



Toroslar



Stakeholder Engagement Plan



**Toroslar Elektrik
Dağıtım A.Ş. (Toroslar
EDAŞ)**

January 2024

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1. INTRODUCTION

1.1 Overview

Enerjisa Enerji A.Ş. (Enerjisa) owns and operates three electricity distribution and retail companies in the regions of Ankara Elektrik Dagitim A.S. (Baskent EDAS), Asian side of Istanbul Elektrik Dagitim A.S. (Anadolu Yakasi EDAS), and central southern part of Türkiye. Toroslar Elektrik Dagitim A.S. (Toroslar EDAS). The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) has a well-established relationship with Enerjisa through previous projects. The EBRD is considering providing additional loan up to USD 75 million, 5-year senior unsecured term loan in TRY (the “Loan”, the “Financing”) to Enerjisa (the “Company”, “the “Client”). The proceeds of the Loan will be used to finance expansion of Enerjisa’s business lines established through its subsidiary Toroslar EDAS. The expansion strategy mainly includes investing in modernization and reconstruction investments for the electricity network in Toros region, affected by the destructive earthquakes on 6 February 2023.

To finance the Project, European Bank for Reconstruction and Development (EBRD) requires the Company to comply with all applicable Turkish laws and regulations and those of the EBRD. EBRD performance standards (PRs) call for the preparation of the following documents, along with the present Stakeholder Engagement Plan (SEP): a Project specific Non-Technical Summary (NTS) and an independent Environmental and Social Due Diligence (ESDD) process leading to an Environmental and Social Action Plan (ESAP), agreed with the Company. In line with EBRD PR 10, this SEP presents the Company's commitment and approach in terms of disclosure of Project information and engagement of Project stakeholders. There is a Corporate SEP that is available on the website (<https://www.enerjisainvestorrelations.com/en/sustainability/corporate-stakeholder-engagement>). However, this SEP has been developed for the Toroslar EDAŞ, along with the PRs conforms to the importance of an open and transparent engagement between the Company, its employees, local communities directly affected by the Company operations, and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship.

This document is intended for public disclosure and will be made available in Turkish and English by Enerjisa. This Stakeholder Engagement Plan (SEP) provides a framework outlining the requirements and applied processes for stakeholder engagement and public consultation, stakeholder identification, and grievance mechanism planned by Enerjisa . In case of any queries, comments, or suggestions concerning this SEP or the Company's operations using the contact details are given below:

Corporate Address:

Enerjisa Enerji A.Ş. Barbaros Mah. Begonya Sok. Nida Kule Ataşehir, Batı Sitesi No:1/1 Ataşehir 34746 Istanbul. Phone: 444 4 372

Website: www.enerjisa.com.tr

Toroslar EDAS Address:

Toroslar EDAŞ Genel Müdürlük Cemalpaşa, Cevat Yurdakul Cad. 4 A, 01120 Seyhan/Adana

Phone: 0322 455 60 00

Website: www.toroslaredas.com.tr

1.2 SEP Objectives

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

The primary objectives of Toroslar EDAŞ stakeholder engagement are as follows

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

about the Toroslar EDAŞ and social performance. The grievance mechanism will be scaled to the Project's risks and potential adverse impacts.

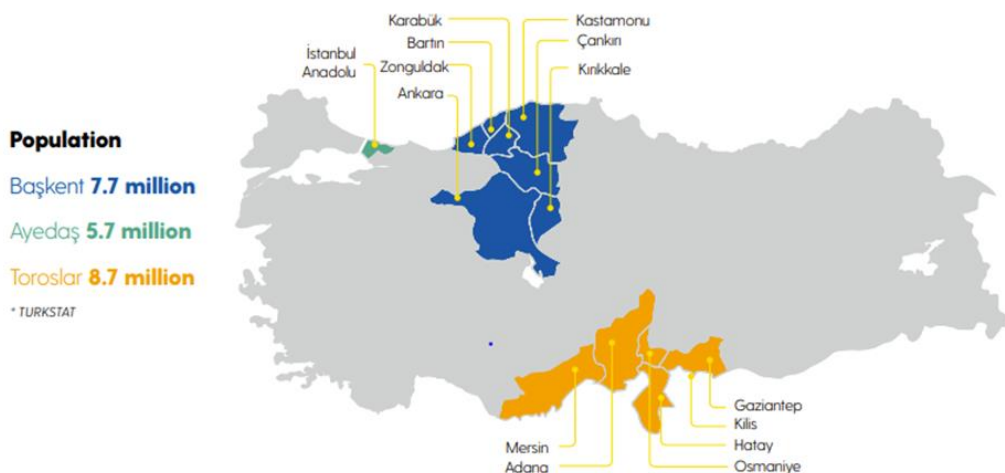
- **Ongoing Reporting to Affected Stakeholders** Provide periodic reports to the affected stakeholders that describe progress with the implementation of the project Action Plans on issues that involve ongoing risk to or impacts on affected stakeholders and on issues that the consultation process or grievance mechanism has identified as a concern to those stakeholders.

2. THE OPERATION AT A GLANCE

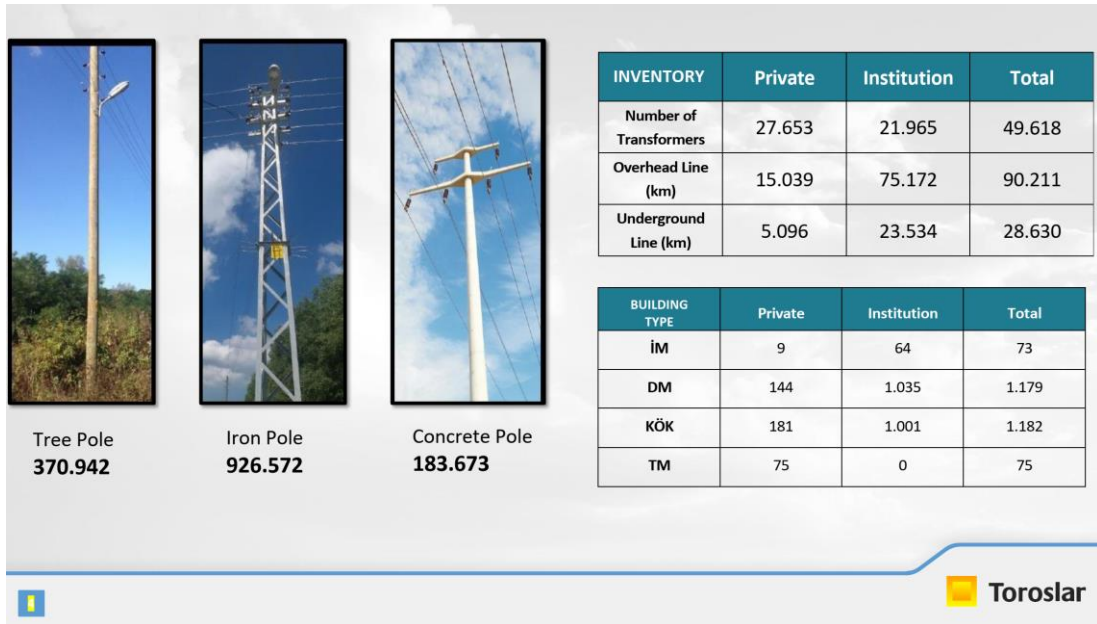
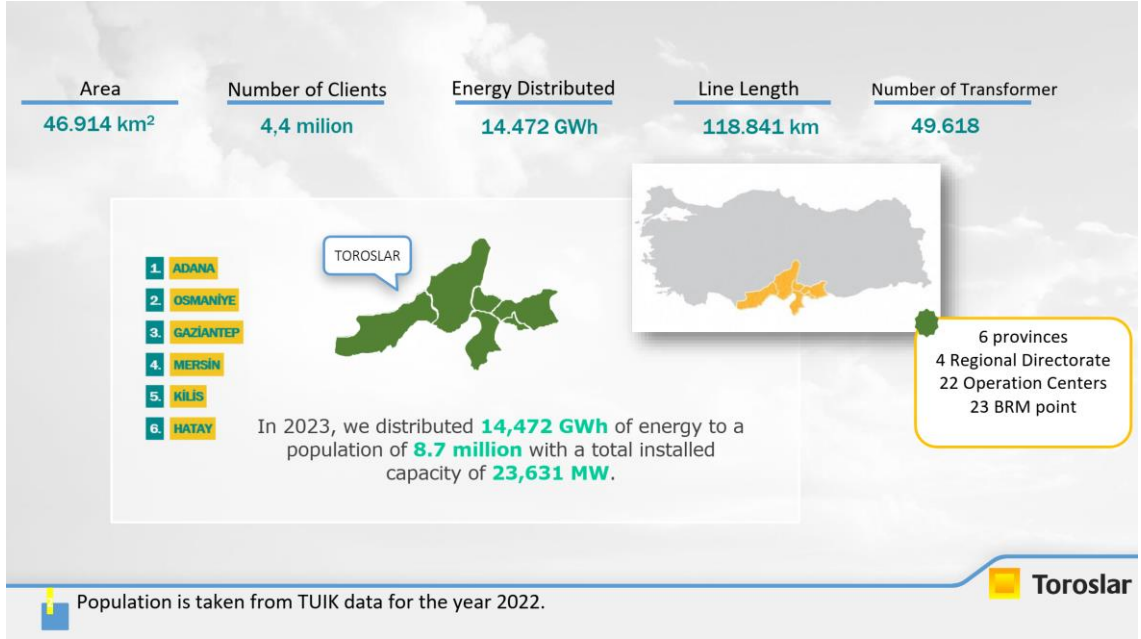
Enerjisa is a prominent company in Türkiye's electricity industry, specializing in electricity distribution, retail sales, and customer solutions. The network consists of 10,500 employees serving a population of 22.1 million and 10.6 million customers across fourteen provinces in three distribution regions. Enerjisa is the largest electricity distribution and retail sales company in a regulated sector in Türkiye, Enerjisa Enerji operates in several regions, including the capital city of Ankara, the densely populated Anatolian side of Istanbul, and major commercial and industrial cities like Adana, Gaziantep, and Mersin. The complete list of regions is as follows:

- Başkent region: provide distribution services through Elektrik Dağıtım A.Ş. (Başkent EDAŞ) which encompasses the provinces of Ankara, Türkiye's capital, Zonguldak, Kastamonu, Kırıkkale, Karabük, Bartın and Çankırı.
- AYEDAŞ region: An acronym for our distribution subsidiary Istanbul Anadolu Yakası Elektrik Dağıtım A.Ş. (AYEDAŞ), this region covers districts on the Anatolian side of İstanbul.
- Toroslar region: This region covers the provinces of Adana, Gaziantep, Mersin, Hatay, Osmaniye and Kilis. Distribution and energy retail services in the Toroslar region are provided by Toroslar Elektrik Dağıtım A.Ş. (Toroslar EDAŞ)

Within the investment program for electricity distribution services, the area of activity of Enerjisa includes the construction of new distribution facilities, conducting capacity increases, construction of additional facilities for the existing network, conducting maintenance and repair services, evaluation of connection applications, providing service through executing network connection agreements with the consumers, reading the indexes from the consumer meters, conducting lighting works, conducting replacement and calibration works for the meters, tackling with the technical and non-technical losses, conducting services for minimizing the electrical failures, the duration and number of power cuts and ensuring the continuity of electricity supply.



2.1 Existing Assets of Toroslar



Toroslar Current SCADA Number and New SCADA Tenders

**735 YG
SCADA**

**72 MORE YG
SCADA CENTERS
WILL BE BUILT**

**1711
TRAFO
SCADA**

**108 MORE
TRANSFORMER
SCADAS WILL BE
INSTALLED**

The project in which we can control the cells we install at the root DM points up to a maximum of 6 cells, and where we get peak data from the internal transformer, if any.

**1480
DÜT
SCADA**

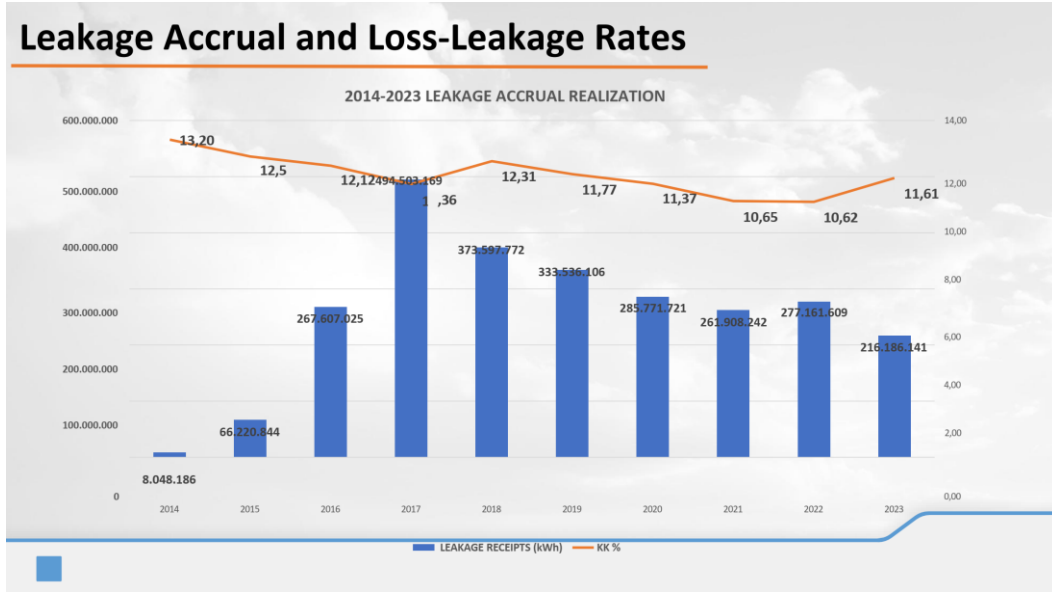
520 MORE DUT SCADA WILL BE BUILT

Project installed in pole-top transformers, where we monitor peak data



4377 personnel within
Toroslar EDAŞ
are available.
Of these;
971 are **BY**
and **3406** are **MY**.

 **Toroslar**



The total number of permanent staff employed under Enerjisa Dağıtım is 10,419. A total of 674 women are employed in the company, representing 6,5% of the total workforce. The breakdown of the number of staff according to gender is provided below (as of November 6, 2023):

Table 2-1 Breakdown of Enerjisa Dağıtım Staff

Role	AYEDAŞ	BAŞKENT	TOROSLAR	Grand Total
White Collar	486	1,452	955	2,893
Blue Collar	1,451	2,669	3,406	7,526
Grand Total	1,937	4,121	4,361	10,419

Table 2-2 Breakdown of Enerjisa Dağıtım Staff by Gender

Role	AYEDAŞ	BAŞKENT	TOROSLAR	Grand Total
White Collar	486	1,452	955	2,893
Female	108	380	156	644
Male	378	1,072	799	2,249
Blue Collar	1,451	2,669	3,406	7,526
Female	5	16	9	30
Male	1,446	2,653	3,397	7,496
Grand Total	1,937	4,121	4,361	10,419

2.2 Legislative background

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

2.2.1 National Standards

Constitution of the Republic of Turkey

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

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

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

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

Right to petition (Article 74 of the Turkish Constitution)

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

Law on the right to information

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

Law on Use of the Right to Petition

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

Expropriation Law

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

Environment Law

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

Regulation on EIA

The Environmental Impact Assessment (EIA) Regulation in Turkey was introduced in 1993 and underwent revisions in 1997, 2002, 2003, 2008, 2013, 2014, and 2022 (current EIA Regulation - Official Gazette Date/Number: 29.07.2022 /31907). It should be noted that the transmission lines below 154 kV are exempt from the Turkish EIA Regulation. The electricity distribution lines and relevant facilities are not covered under Annex I and Annex II of the Environmental Impact

Assessment (EIA) Regulation. Hence, Enerji operations are not subject to the Turkish EIA Regulation.

Energy Market Regulatory Authority (EMRA)

Electricity distribution is the transmission of electricity to end users via low voltage (under 36 kV) power lines. According to EMRA regulations, Turkey's distribution network is divided into 21 distribution regions. These regions have been operated by private distribution companies since the privatizations held between 2009 and 2013. Distribution companies are responsible for preparing and implementing investment plans by taking into consideration energy demand, network requirements and all investment needs within the Company. They are also responsible for managing their investment budgets in addition to preparing a 5-year investment budget, budget justification report and investment reports that are presented to EMRA.

Regional distribution network operators are responsible for undertaking mandatory investments related to environment, safety, renovation and expansion; reading and maintaining electricity meters; demand forecasting and preparing investment plans; monitoring theft/loss rates; supplying electricity in the event of technical and commercial losses; taking all necessary technical and operational measures to reduce power theft/loss and providing lighting in public areas in their respective regions.

Enerjisa centrally manages and monitors all its network operations in its 3 distribution regions. As part of grid management processes, Enerjisa undertakes efforts to expand and renovate its network and boost the network's operational efficiency; as well as carrying out research and development efforts. These various activities enable Enerjisa to standardize network management processes in its 3 regions; create centralized procedures; determine key performance indicators such as complying with EMRA's technical, commercial and supply security standards; meet outage and theft and loss targets, connection requests

2.2.2 EBRD Performance Requirements

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

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

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

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

PR 2: Labour and Working Conditions - this PR recognizes that for clients and their business activities, the workforce is an asset and that good human resources management and a sound

worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key ingredients to the sustainability of business activities.

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

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

PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources. EBRD recognises the need for the protection and conservation of biodiversity in the context of projects in which it invests.

PR 8: Cultural Heritage. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage and the Convention for the Safeguarding of Intangible Heritage, this Performance Requirement aims to protect irreplaceable cultural heritage and to guide clients to avoid or mitigate adverse impacts on cultural heritage in the course of their business operations.

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

2.3 Related Internal Policies, Plans, and Procedures

Enerjisa management has established a formal Quality Health, Safety, and Environmental (QHSE) management system in line with the ISO 14001 Environmental Management System, ISO 45001 Occupational Health and Safety Management System, ISO 9001 Quality Management System, Information Security Management System ISO 27001, and ISO 10002 Complaints Management System. Enerjisa acquired the relevant management system certificates in 2017 by TUV-Nord and had them recertified over the years.

The management systems in place are as follows:

Number	Certificate	Validity
ISO-EN 9001: 2015	Quality Management System Certificate	24.11.2023
ISO-EN 14001: 2015	Environmental Management System Certificate	24.11.2023
OHSAS 45001: 2018	Occupational Health and Safety Management System Certificate	24.11.2023
ISO 10002: 2018	Customer Satisfaction Management System Certificate	28.08.2025
ISO 27001: 2022	Information Security Management System Certificate	28.08.2025
ISO 37301: 2021	Compliance Management System	28.08.2025

Number	Certificate	Validity
ISO 22301: 2019	Business Continuity Management System	28.08.2025
ISO 50001: 2018	Energy Management System	28.08.2025

TUV Nord conducted an audit for the certification of the ISO-EN 14001:2015 and OHSAS 45001:2018 management systems on 23.10.2023.

The Company has established and maintains a QDMS – (Quality Document Management System) integrated management system where the environmental and social management programs are monitored, applicable national laws and regulations are followed up, and Project related E&S information is shared with all employees. Enerjisa has integrated the management systems for all Enerjisa operations and activities in all regions. The document references the applicable standards, Enerjisa activities, organizational units, and functions.

Documented procedures and evidence were as follows:

- Documented status of E&S Management System (ESMS) development. Enerjisa has the following policies in place from which the appropriate components are based on:
 - Human Rights Policy
 - Energy Management Policy
 - Water Policy
 - Personal Data Protection Policy
 - Disclosure Policy
 - Quality Policy
 - Health and Safety Policy
 - Data Protection Management Policy
 - Customer Satisfaction Policy
 - Environmental Policy
 - Anti-Bribery and Anticorruption Policy
 - Enerjisa Code of Conduct and People Guideline
 - Diversity and Inclusion Policy
 - Human Resources Policy
 - Zero Tolerance Policy
 - Compliance Policy
 - Antiretaliation Policy
 - Third Party Relations Policy

2.4 Potential Social Impacts of the Project

Social impact analysis for the project was realised based on Procedure on Identification of Environmental and Social Risks. Potential social impacts and related risks were identified.

These risks are followed one by one by relevant departments within a QDMS software, Environmental and Social Impacts Assessment Module. These risks are summarised below as distributed within related impact area and provision of expectation of realisation and

mitigation/management measures. When new impacts and risks are identified and risks in QDMS software is evaluated this part will be updated.

Impact Area	Affected Stakeholders	Risks	Impact Magnitude/ Realisation Possibility	Mitigation Management Measures
Land Acquisition and Livelihoods	Land owners, Leasers, informal users, people doing land-based economic activities: agriculture and animal husbandry	<ul style="list-style-type: none"> • Loss of only livelihood resource of land owners • Possible grievance of land owners after land acquisition (Non-payment or late payment of compensations) 	Low /Low	<ul style="list-style-type: none"> • Keeping land acquisition to minimum and priority preference of public lands • Land Acquisition Procedure and leaflet, identification of land owners during project development and pre-acquisition information meetings • Information provision, support and consultancy on rights and legal issues (in order to prevent late payments)
		<ul style="list-style-type: none"> • Late access to information by land owners • Lack of identification of vulnerable groups 	Medium/ Medium	<ul style="list-style-type: none"> • Pre-acquisition information meetings for land owners and distribution of printed information • Sending written information to local authorities • Identification of vulnerable groups during pre-acquisition meetings and taking note in meeting minutes
Labour Conditions	Workforce	<ul style="list-style-type: none"> • Non-compliance with legislation and standards on workplace conditions and labour rights • Forced labour, child labour and other labour problems in contractors and supply chain 	Medium/ Medium	<ul style="list-style-type: none"> • Human Resources Policy • Discipline Procedure and code of conduct

		<ul style="list-style-type: none"> • Violation of women rights, mobbing and harassment • Disturbing behaviours of workers with regards to external stakeholders 	Medium/ Medium	<ul style="list-style-type: none"> • Improve and strengthen the content of gender equality program in rural communities • Include gender equality and prevention of gender-based violence and harassment issues in contractors' training • Clarify and strengthen gender equality commitments in contractor control processes i.e., contracts • Diversify and enhance social media awareness raising share on gender equality with prevention of violence and harassment issue • Support and promote awareness raising through arts and cultural activities as well as raising gender equality awareness ambassadors.
Labor Conditions	Workforce	<ul style="list-style-type: none"> • Lack of access to grievance mechanism, late response to complaints or lack of response • Overlook of complaints related to contractors 	Medium/ High	<ul style="list-style-type: none"> • Information on grievance mechanism in information brochures • Placement of complaint call center numbers in construction site sign boards and concealing boards • Prioritisation of muhtars (village managers) in complaint call centre • Availability of complaint forms in field teams and vehicles • Assessment of complaints about contractors within field controls and forms
Impacts of investments, projects and construction	Communities affected from investment and projects, clients, general public	<ul style="list-style-type: none"> • Dust, noise and disturbing activities • Creation of H&S risks due to traffic and fast drive of vehicles • Grievance of public and businesses by unplanned cuts during maintenance and operation activities • Unauthorised entry in transformers, climbing up poles and creating H&S risks • Disturbing behaviours of workers i.e. harassment, mobbing and social disturbance 	Low/High	<ul style="list-style-type: none"> • Environmental and Social Risks Management Plan • H&S Processes and management plans • Ethics Rules • Discipline Regulation • Complaints Mechanism • Internal and External Audits

	Communities affected from projects and investments	<ul style="list-style-type: none"> • Harm on lands, crops or animals of land owners 	Low/High	<ul style="list-style-type: none"> • Awareness raising and training construction of contractors • Identification of harms with the participation of representatives of agricultural directorates and provision of compensation
Community Health and Safety	Communities affected from investment and projects, clients, general public	<ul style="list-style-type: none"> • Emergency Conditions • Security risks and management • Project related health and safety risks • Traffic accidents 	Medium/ Medium/ Medium/ Medium	<ul style="list-style-type: none"> • Emergency preparedness and response action plan and emergency risk assessment procedure • Security policy and providing relevant training to security personnel • Assessment project-related risks related to public health and safety and taking necessary actions • Implement of road safety policy, practices, and procedures.
Information Disclosure and Stakeholder Engagement	All stakeholders	<ul style="list-style-type: none"> • Presence of unidentified stakeholders 	Low/ Medium	<ul style="list-style-type: none"> • Stakeholder Engagement Plan and Updates of the plan
	All stakeholders	<ul style="list-style-type: none"> • Lack of access to information, lack of information on investment plans, stakeholder engagement plan, grievance mechanism, social responsibility programs and reports. Lack of information on general about risks and impacts. 	High/High	<ul style="list-style-type: none"> • website (https://www.toroslaredas.com.tr/) • Media communications (newspapers, radio and TV) • Social Media • SMS • Brochures • Written information sent to governorships and local authorities; • Visits to and meetings with municipalities and muhtars, • Prioritisation of muhtars in call centre
	Subscribers with health issues	<ul style="list-style-type: none"> • Electricity cuts of subscribers who are dependent on machines working on electricity 	Not identifiable/H igh	<ul style="list-style-type: none"> • Identification of these kind of subscribers in the system and prevention of cuts • Announcement from web site and with brochures, information provided to muhtars
	Clients and general public	<ul style="list-style-type: none"> • Not knowing where to complaint, lack of access to grievance mechanism, problems 	Medium/high	<ul style="list-style-type: none"> • Grievance Mechanism • Customer Satisfaction Standard Certification-ISO 10002

		in recording complaints, lack of response in time and lack of response, closure of complaint without resolution and similar risks.		<ul style="list-style-type: none"> • Stakeholder Engagement Plan • Trainings • Brochures • Web site and social media • Availability of complaint forms local offices and field vehicles
	Internal Stakeholders- Employees	<ul style="list-style-type: none"> • Non-compliance with legislation and standards on workplace conditions and labour rights, • Violation of women rights, mobbing and harassment • Disturbing behaviours of workers with regards to external stakeholders • Forced labour, child labour and other labour problems in contractors and supply chain 	Medium/ High	<ul style="list-style-type: none"> • Human Resources Policy • Discipline Procedure and code of conduct • Grievance Mechanism • Internal and External Audits • Trainings

3. STAKEHOLDER ENGAGEMENT PROCESS

3.1 Stakeholder Identification

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

- Determines all project stakeholders; While doing so, it examines all the stakeholders at all levels, from the local community and public institutions to national and international stakeholders.
- Plans management of the relationship with stakeholders, the impact of stakeholder engagement on the Project, the means of communication, and contact frequency to be used for the stakeholders.
- Performs active stakeholder communication at a local level to mitigate the possible negative effects of the Project for the project-affected communities and allow the local communities to benefit from the potential positive impact of the Project.
- Records complaints and demands of the stakeholders and provides feedback to demanding and complaining stakeholders as soon as possible.
- Develops methods for especially vulnerable/disadvantaged groups/individuals to ensure local access to the Project in the stakeholder participation.
- Tracks culturally appropriate style and method in all communication.

- Creates opportunities for stakeholder engagement by using different communication channels to ensure the effective participation of stakeholders.
- It allows other groups affected by the Project, particularly nongovernmental organizations (NGOs), to express their opinions on the proposed actions during the Project's life cycle.
- Identifies detailed action plan by preparing Stakeholder Engagement Plan, especially for the Project, and ensures monitoring and reporting of procedures since the scope of the project and local needs change for each specific Project.

In general, stakeholders can be categorized into two groups;

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

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

Based on a review of Corporate SEP and the 2022 sustainability report, Enerjisa has identified a list of key stakeholder groups, communication methods per group, and communication objectives. The Corporate SEP has conducted a stakeholder analysis to determine the priorities of the stakeholders per the AA1000 Stakeholder Engagement standard. Based on these documents, Toroslar EDAŞ key stakeholder groups can be taken as

3.1.1 Customers (including Vulnerable Groups)

Customers are among the most important stakeholders for the Project in relation to electricity distribution operations particularly in terms of quality and efficiency of services provided by Enerjisa and Toroslar EDAŞ. Service beneficiaries include local residents, commercial businesses/industries, and eligible customers.

3.1.2 Neighboring Communities and Facilities (including Vulnerable Groups)

Neighboring communities and facilities are among the important stakeholders both in relation to operational activities (particularly related to repair and maintenance activities in the vicinity of settlements and sensitive receptors) and future construction activities (mainly in terms of impacts on local residents and businesses related to physical or economic displacement). Landowners/users (including Vulnerable Groups)

The Project may require some permanent acquisition of private land and/or use rights purchase, which will require agreements with applicable land owners/users. Toroslar EDAŞ will inform and consult the affected land owners/users regarding the land acquisition and compensation procedures, legal rights and land use restrictions during the construction and operation phases through written notifications, community leaflets, posters, newsletters, and face-to-face meetings. Additionally, grievance mechanism and complaint access details will be provided during these meetings so that affected communities will benefit from grievance mechanism. In order to minimize expropriation needs, Toroslar EDAŞ will take all necessary measures to avoid physical resettlement in future

investment projects and will consider, to the extent possible, public areas (such as roads, streets, parks, squares, etc.) for distribution network routings.

Among the land owners/users, potential vulnerable groups will be given priority as stakeholders and their access to project information disclosure should be ensured. Such groups may include women, disabled people and certain disadvantaged groups (including illiterate people, elder people, people with special needs, land users without official title deeds and similar). These people will be identified during pre-acquisition information meetings and information will be provided. They will also be supported and provided assistance/counseling if they have special needs.

3.1.3 Employees

The employees of the company will be affected by the Project and associated changes in operations including changes in workload, shifts and similar. No retrenchment or workforce expansion is planned within the scope of the Project. A total number of 10,500 permanent staff are currently employed under Enerjisa. The Company is committed to be in compliance with the Turkish Employment Laws and EBRD PR2 requirements on labor and working conditions. Employees will be informed about the grievance mechanism during recruitment and at all stages of the Project. To this end, meetings with worker representatives will be held to inform the employees about the grievance mechanism. Trainings and toolbox talks will also be conducted to familiarize the employees about mechanism of internal grievance. Face to face meetings will be held with each employee if required. Employee satisfaction surveys will be conducted to be able to get feedback on the grievance mechanism and necessary actions will be taken to improve the mechanism.

3.1.4 Contractors and Suppliers

Sub-contractors and suppliers of Enerjisa constitute important stakeholders for both existing operations and Project related activities. The Company engages with several full-time subcontractors including repair and maintenance, connection/disconnection in electrical installations, meter reading operations, cleaning services, security services, call center, construction works (both above- and underground facilities).

Subcontractor employees will be informed about the grievance mechanism at all stages of the Project. To this end, trainings and toolbox talks will be conducted to familiarize the contractor employees about mechanism of internal grievance. Face to face meetings will be held if required. Regular annual employee standard reviews will be carried out by Enerjisa. Complaints of stakeholders related to the activities of contractors will be handled within Enerjisa grievance management system. General complaint venues are disclosed in information disclosure activities; in addition call center details are available in sign boards of construction sites or construction area concealing covers.

3.1.5 Governmental Organizations

Governmental agencies can be grouped as national, provincial, district and local (i.e. neighborhood) levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. The Government (e.g., the Republic of Turkey, relevant ministries,

municipalities, and other relevant local authorities).

3.1.6 Other Groups

- Lenders
- NGOs' international, national, and local
- Company Shareholders, Investors, Enerjisa
- Media.

3.2 Stakeholder Groups

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

Table 3 Stakeholder Groups

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
External Stakeholders		
<p>National Institutions: National Government is of primary national political importance to the business and/or projects/activities in establishing policy, granting permits or other approvals, and monitoring and enforcing compliance throughout all stages of the Project or activity life cycle.</p>	<ul style="list-style-type: none"> • Ministry of Environment, Urbanization, and Climate Change • Ministry of Labor and Social Security • Ministry of Energy and Natural Resources • TEDAŞ (Turkish Electricity Distribution Inc.) • TEIAS (Turkish Electricity Transmission Inc.) • TETAS (Turkish Electricity Contracting and Trading Co.) • EMRA (Energy Market Regulatory Authority) • Ministry of the Interior • AFAD Ministry of the Interior Disaster and Emergency Management Presidency • ISKUR (Labor Institution of Turkey) • Ministry of Labor and Social Security (MoLSS), General Directorate of Occupational Health and Safety • MEUP, General Directorate of Environmental Management 	<ul style="list-style-type: none"> • Policy formulation • Permitting /Regulation
<p>Local Institutions Local government is important to the business and/or Project as they are responsible for implementing legislation and development plans and policies at the municipal or commune level. In addition, the municipalities and/or communes in the Project area will be impacted by the Project and will need to be kept informed of progress and plans in their area, to consider the Project activities in their policymaking,</p>	<ul style="list-style-type: none"> • Governorships of Related Provinces • Related Municipalities • Related Provincial Directorates of Environment, Urbanization, and Climate Change • Related Provincial Directorates of Labor and Social Security • Related Provincial Directorates of Ministry of Energy and Natural Resources • Related Provincial Directorates of Ministry of the Interior • Related Provincial/Operational Directorates of Forestry 	<ul style="list-style-type: none"> • Social and economic development, • Corporate Social Responsibility, • Management of environmental and social impacts • Permitting /Regulation

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
regulatory and other duties, and activities.	<ul style="list-style-type: none"> • Related Provincial Directorates of Culture and Tourism • Related Provincial Directorates of Security ((Police) • Related Provincial Directorates of Disaster and Emergency Management 	
Lenders	International finance institutions such as EBRD	<ul style="list-style-type: none"> • Project Finance • Environmental and social impacts
NGOs international, national, and local NGOs with a direct interest in the Project and/or activity & associated facilities and their social and environmental aspects can influence the Project and/or activity directly or through public opinion.	<ul style="list-style-type: none"> • Association of Distribution System Operators (ELDER) • Association for the Protection of Consumers (TÜKODER) • Related Chambers Of Industry • Chambers of Electrical Engineers (EMO) • Chambers of Electrical Technicians (• Chambers of Industry 	<ul style="list-style-type: none"> • Management of Environmental and Social impacts, • Corporate Social Responsibility • Environmental and social impacts • Economic development • Inclusivity and accessibility • Security impacts
Education Institutions	Universities Schools in Affected Settlements	<ul style="list-style-type: none"> • Technical Consultancy • Corporate Social Responsibility • Capacity Building
Business Environment: Businesses and individuals directly interested in the Project and/or activity, e.g., running businesses or providing services and supplies to the Company.	<ul style="list-style-type: none"> • Contractors and subcontractors (construction, maintenance, consulting, and engineering services providers, installations, and equipment suppliers) • Suppliers • Project Developers and Investors • Local Enterprises and small businesses • Customers 	<ul style="list-style-type: none"> • Supply of Goods Services • Marketing and sales networking • Economic
Media	<ul style="list-style-type: none"> • Local and national newspapers, • TV channels • Social media, Twitter, linked-in, and Facebook 	<ul style="list-style-type: none"> • Relaying correct Project information to communities • Advertisements
Neighboring Communities and Facilities (including Vulnerable Groups) Households and communities that may be directly or indirectly affected by the Project and/or activity. This includes people living on land affected by the Project and/or activity,	<ul style="list-style-type: none"> • Project Affected People • Muhktars 	<ul style="list-style-type: none"> • Downstream Impact / Community Health & Safety Management of environmental and social impacts, • Corporate Social Responsibility
Landowners/users (including Vulnerable Groups) The Project may require some permanent acquisition of private land and/or use rights purchase,	<ul style="list-style-type: none"> • Project Affected People • Muhktars 	<ul style="list-style-type: none"> • Land acquisition/potential loss of economic livelihood

Stakeholder Groups	Main Stakeholders	Summary of Specific Interest/Relevance
which will require agreements with applicable land owners/users.		<ul style="list-style-type: none"> • Corporate Social Responsibility
Internal Stakeholders		
Company Shareholders, Investors	Enerjisa Shareholders	<ul style="list-style-type: none"> • Reputation regarding Environmental and Social Business growth and shareholder value
Employees	Employees Trade Unions Contractors and their Employees	<ul style="list-style-type: none"> • Labor and working conditions • Local procurement • Environmental and social impacts

3.3 Stakeholder Engagement Activities

Toroslar EDAŞ will maintain an open-door policy around stakeholder engagement. This SEP and relevant social & environmental policies and documentation will be disclosed on Enerjisa Enerji and Toroslar EDAŞ website (www.enerjisa.com.tr and www.toroslaredas.com.tr). v

Enerjisa Corporate SEP has identified the engagement methods, engagement frequency, and targets/evaluation criteria, as presented in the table below which have been kept and revised as necessary for Toros EDAŞ. Following the analysis of the stakeholders, the communication platforms and methods, communication frequency, as well as target and evaluation criteria to measure the success of stakeholder engagement as part of the topics highlighted during the stakeholder analysis (**Table 4**):

Table 4 Stakeholder Engagement Methods

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
National Institutions	Communication with authorities follows established procedures in line with regulations. The communication takes place through the following distribution channels: <ul style="list-style-type: none"> • official letters, phone, or email, • meetings w with the administration/representatives of the Company, • public events/meetings, 	Continuously	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues • Compliance with national regulations • Number of visits conducted • Official correspondence recorded

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Local Institutions	<p>Communication with authorities follows established procedures in line with regulations. The communication takes place through the following distribution channels:</p> <ul style="list-style-type: none"> • official letters, phone, or email, • meetings with the administration/representatives of the Company, • public events/meetings, 	Continuously	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on permitting /regulation/ operational issues • Compliance with national regulations • Number of visits conducted • Official correspondence recorded
Lenders	<ul style="list-style-type: none"> • Face-to-face meetings • Conferences • Phone calls • Periodical Monitoring Reports (Annual Monitoring Reports, Operation Reports, Consultant's Operational Monitoring Reports) 	Continuously	<ul style="list-style-type: none"> • Sustaining continuous, open, and transparent communication on environmental & social & technical, and financial issues of operations • Compliance with international requirements • Company credibility and financial sustainability
NGOs	<ul style="list-style-type: none"> • Company website • Formal consultation mechanisms; • Meetings • Letters • Email • Phone • Memberships • Joint projects, social responsibility projects • Annual Report and Sustainability Report 	When needed	<ul style="list-style-type: none"> • Increasing stakeholder engagement for Company's corporate social responsibility topics
Education Institutions	<ul style="list-style-type: none"> • Site visits Articles and publications, academic research • Joint projects • Training and technical support • Sponsorships • Seminars and university events • Meetings and talks. • Annual Report and Sustainability Report 	Continuously throughout the year.	<p>Ensuring collaboration and information sharing with the universities through Joint Projects</p> <p>Ensuring collaboration with schools at the local level for Social Projects on education</p> <p>Attracting qualified talents- Attending university/ digital career fairs</p>

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Business Environment	<ul style="list-style-type: none"> • Company website, along with its log for registering requests for information from suppliers • Tender opportunities are available on the dedicated page of the Company's portal. • Communication with potential partners takes place through the following communication channels: <ul style="list-style-type: none"> • meetings with the administration / • representatives of the Procurement Department • Business associations, • tenders for the purchase of services or goods • letters, press releases • public events • email, phone. 	When needed	<ul style="list-style-type: none"> • Supporting the development of local suppliers • Delivery of goods & services on time • Giving priority to local procurements • Increasing the opportunities to make a cooperation with local businesses related to Company's activities,
	<p>Customers</p> <ul style="list-style-type: none"> • Social media and digital channels • Customer satisfaction surveys • Field events • Regional fairs • One-on-one meetings • Annual Report and Sustainability Report 	Continuously	
Media	<p>Communication with the media will be done through the Company website, press releases, newspaper announcements, TV and Radio Campaigns, articles, and interviews.</p> <ul style="list-style-type: none"> • Interviews • Press conferences and events. • Press releases. • Material Disclosure • Social media • Annual Report and Sustainability Report 	At least two times a year	<ul style="list-style-type: none"> • Informing public accurately • Increasing Company reputation and brand value
Neighboring Communities and Facilities (including	Communication with residents around Company operations and activities is performed through the local municipality and village councils or other relevant bodies	When needed	Sustaining continuous, open, transparent, and constructive communication on activities Ensuring effective usage of the Grievance Demand mechanism

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Vulnerable Groups)	and is subject to comment by the public involved. Local communication will focus on the disclosure of routine information, meetings with relevant authorities and councils if needed, and use of the grievance mechanism;		Sustaining open communication downstream impacts of the operations
Landowners/users (including Vulnerable Groups)	Inform and consult the affected land owners/users regarding the land acquisition and compensation procedures, legal rights and land use restrictions during the construction and operation phases through written notifications, community leaflets, posters, newsletters, and face-to-face meetings.	When needed	Sustaining continuous, open, transparent, and constructive communication on activities Grievance mechanism and complaint access details will be provided during these meetings so that affected communities will benefit from grievance mechanism.
Company Shareholders	<ul style="list-style-type: none"> • Corporate and Company website • Annual Report and Sustainability Report • Investor and analyst presentations • Material Disclosure • Financial result evaluation meetings • One-on-one meetings • General Assembly meetings • Working groups • Project partnerships • Report 	Continuously	<ul style="list-style-type: none"> • Ensuring accurate communication flow • Sharing technical & financial & environmental & social performance transparently • Managing Social & environmental & economic sustainability

Stakeholder Group	Stakeholder Communication Platforms and Methods	Communication Frequency	Targets and Successful Self-Evaluation Criteria
Employees	<ul style="list-style-type: none"> • Internal meetings with the administration / Human Resource representatives • Meetings with Labor Union Representatives • Local Committee on the Code of Ethics • Training courses • Email • Phone • In-house portal • Suggestion, appreciation, and reward system • Internal publications, such as announcements and notices • Social activities (online or physical) • Performance Management System • Employee engagement survey • Open Door and Leadership Meetings 	Continuously	<ul style="list-style-type: none"> • Ensuring meaningful consultation mechanisms with the employees and Trade Union • Ensuring accessible feedback mechanism for the employees' opinions and grievances • Increasing employee engagement & satisfaction • Providing a safe working environment and conditions in line with OHS requirements

3.4 Engagement Tools

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

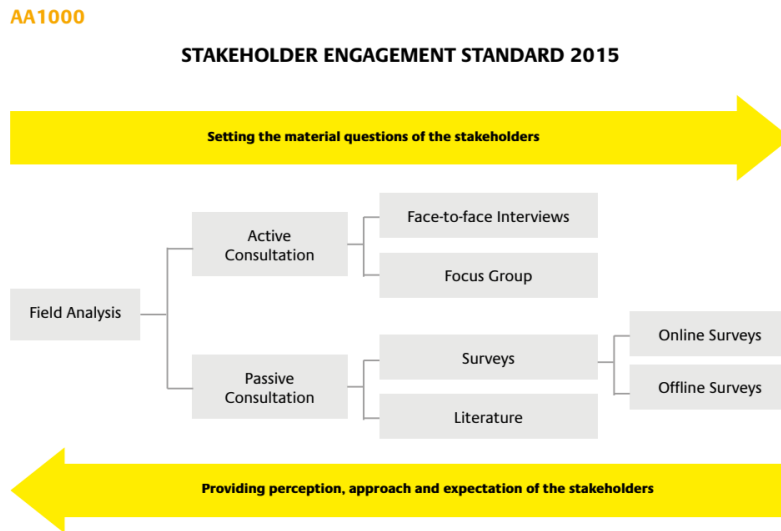
Table 5 Stakeholder Engagement Tools

Tool	Description
Company website	The company websites will provide relevant and up-to-date information regarding construction works and operational aspects. Project NTS, ESAP, and SEP prepared as part of the environmental and social review package, will be accessible online and offline to all interested stakeholders. The description of the External Grievance Form will be made available to the public on the web.
Social Media Platforms	Facebook and Telegram accounts for frequent updates
Brochures and leaflets	<ul style="list-style-type: none"> • Printed brochures or leaflets supporting information and awareness campaigns related to project information • Community leaflets, brochures distributed during information disclosure and engagement activities/meetings for land acquisition. These should include at a minimum information on the process, valuation, FAQs, grievance mechanism

Tool	Description
	and contact details and PR5 process
Electronic and postal mail	Subscription emails and postal letters exchanges.
Regular Internal Reporting	Regular reports will be prepared for the Management team. These reports will include a summary of stakeholder engagement activities and all grievances received in the reporting period, any material deviations, or non-compliances to the requirements of this SEP, planned activities for the next reporting period, and any other issues of potential concern
Reporting to Stakeholders	Project updates to different stakeholder groups if needed. A Sustainability Report, including reporting on the Company's environmental and social performance of the Company will be published annually and disseminated in local communities via local authorities and partners.

4. STAKEHOLDER ENGAGEMENT APPROACH AND ACTIVITIES

Stakeholder engagement is conducted across Enerjisa within the 10.6 million customers, around 11,500 employees, numerous Governors, District Governors, and Mayors in the provinces where we operate, public institutions and local administrations with whom we are constantly interacting, over 8,200 village headmen, our suppliers, business partners, civil society organizations, educational and teaching institutions, and public institutions and international organizations. The Chief Sustainability Officer (CSO), who also heads Corporate Capabilities, holds the primary responsibility for stakeholder engagement. Our approach to identifying stakeholders is based on the AA1000 Accountability Stakeholder Engagement Standard. In line with this Engagement Standard, we conducted a stakeholder analysis in 2022 to gather the views of our stakeholders.



The extent of engagement, level of interaction, methods of engagement vary depending on the roles and responsibilities of departments. A summary of stakeholder engagement activities of Enerjisa Enerji is given in this section. Stakeholder engagement activities are conducted, monitored and reported by the distribution companies monthly or annually depending on the activity. Data registered by distribution companies regarding these activities also provides input to the Corporate SEP Monitoring Report. Detailed information about the methodology and tools such as Action Plan to manage, keep and monitor these data exist in the regional SEPs prepared by each distribution company. Each department of Enerjisa Enerji, has engagement activities related with external stakeholders. Main responsibility for engagement with external stakeholders lies within Corporate Communication and Customer

Relations departments. However, all departments engage with the stakeholders they have identified, in line with the engagement methods identified in this SEP.

A schematic summary of the Company's department-based core works and their intersection with the stakeholders is as follows.

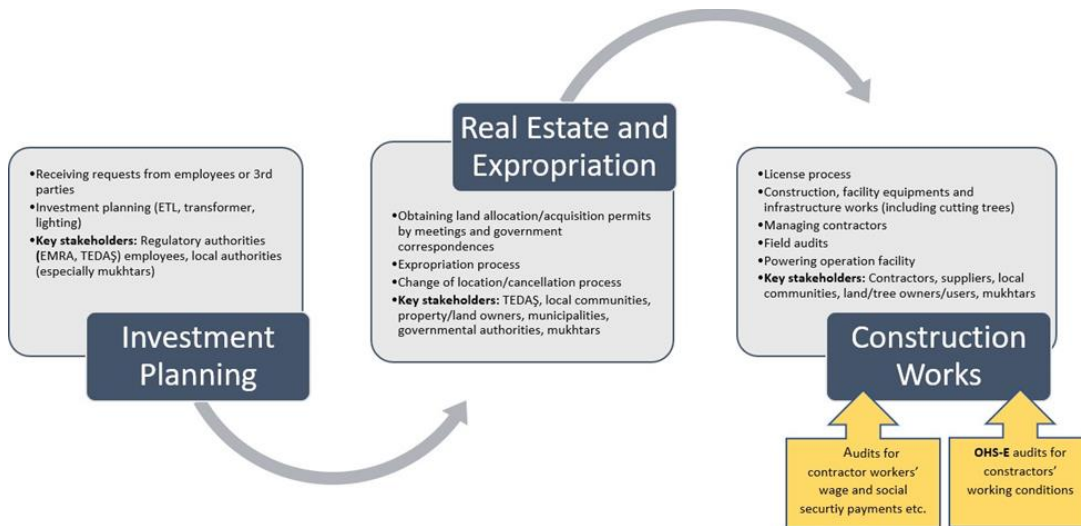


Figure 4. Enerjisa Enerji Core Works and Stakeholders

Main stakeholder engagement activities of the departments can be summarized as below. In addition, social and environmental sustainability, community health and safety, and occupational health and safety are the prevailing focus areas in all processes of each department.

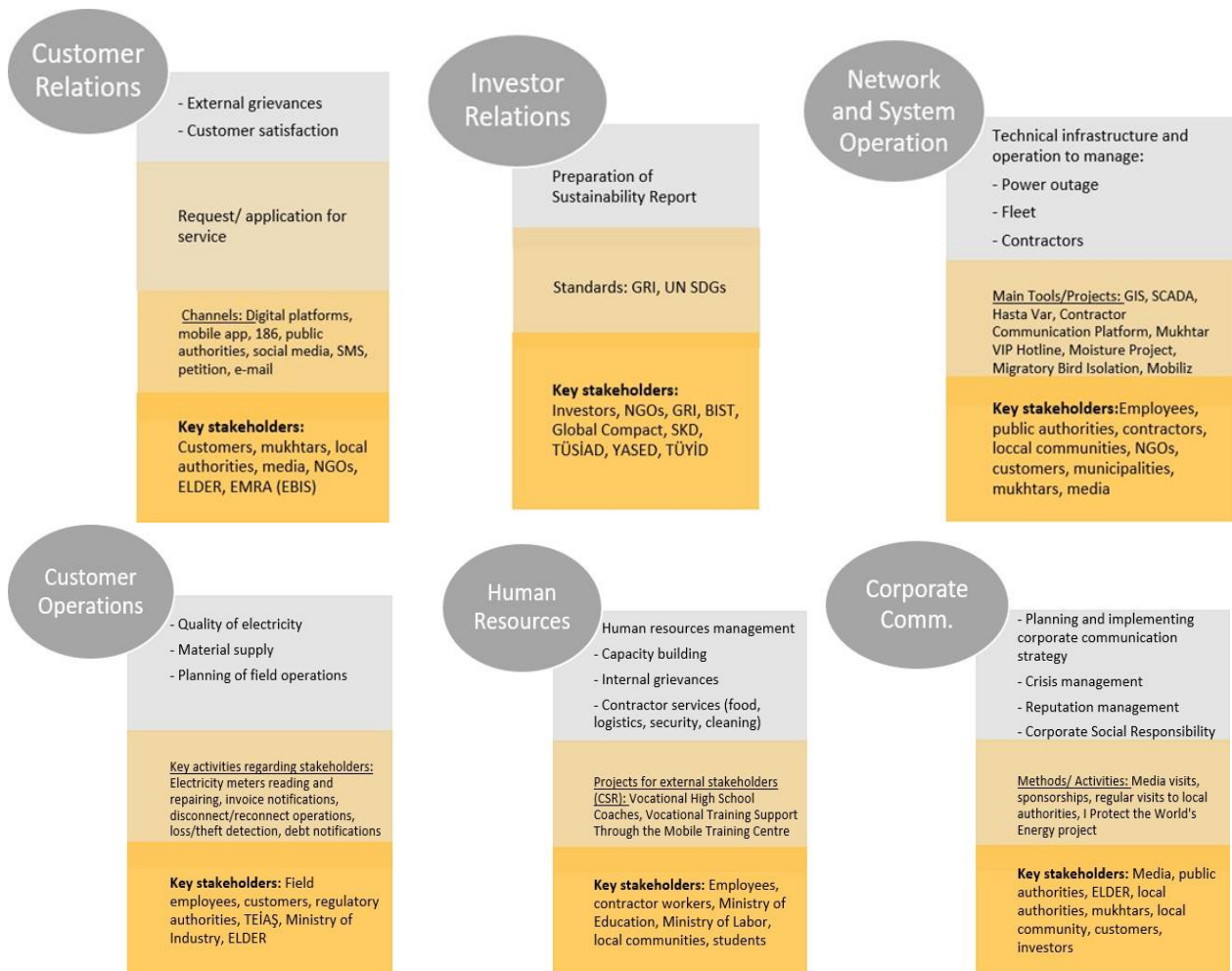


Figure 5. Department-based Stakeholder Engagement Activities

Continuously communicates with internal and external stakeholders through various channels should be conducted as outlined in Table 6. The level of impact, in addition to the stakeholders' needs and concerns, determines the basis of the communication tools and methods selected to engage with certain groups. For example brochures/posters/educational materials will be used in community awareness campaigns regarding energy efficiency, electricity leakages and electricity/traffic etc. risks. The engagement activities will be carried out in a culturally appropriate manner and will include the best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement. The language of communication throughout the Project is expected to be Turkish; however, different languages will also be considered, if need be, to increase the efficiency of the engagement activities and ensure the involvement of all stakeholder groups.

Table 6 Stakeholder Engagement Methods

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> Information sharing (in particular technical) on project requirements and impacts Invitations to meetings and key events during project implementation Arrangements for obtaining permits, licenses, transfer, and allocation of project land Information and data requests that will be utilized for project implementation 	All stakeholders
One-on-one meetings	<ul style="list-style-type: none"> Information collection on an individual basis allows stakeholders to voice their concerns/opinions about sensitive issues Establishing personal connections with key actors Understanding, monitoring, and assessing the project activities' environmental and social impacts and risks on an individual basis Establishing relations on an individual basis 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, organizations/agencies, contractors, Trade Union representatives, employees, dealers, and customer groups
Formal meetings	<ul style="list-style-type: none"> Collective information sharing on project requirements and impacts Receiving comments, feedback, views, and perception of the Project from a group of public institutions Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, organizations/agencies, national and local media Trade Union representatives, employees, dealers, and customer groups
Consultation meetings	<ul style="list-style-type: none"> Information Sharing Receiving comments, feedback, views, and perception of the Project from a group of stakeholders 	Any stakeholder group identified throughout the Project, including the affected communities and groups, local NGOs, national and local government

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	<ul style="list-style-type: none"> Collecting grievances and concerns related to the Project Establishing relations with affected communities and groups 	representatives/authorities, businesses, organizations/agencies, etc. Trade Union representatives, employees, dealers, and customer groups
Focus group discussions	<ul style="list-style-type: none"> Information sharing on a specific topic to a certain group of people, including vulnerable/disadvantaged groups Receiving comments, feedback, views, and perception of the Project from a certain group Collecting grievances and concerns related to the Project from a certain group Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discussed during the meeting, vulnerable/disadvantaged groups/individuals
Website	<ul style="list-style-type: none"> Sharing project-relevant information and update on progress Disclosing project/ related documentation and communication tools: Environmental and Social Documents, presentations, brochures, etc. Announcements of key events (date/time, venue) 	Any stakeholder group identified throughout the Project, including affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies
Digital communication tools social media (Facebook, Twitter, Instagram accounts, WhatsApp groups), national/local television channels, radio stations, SMS, etc.	<ul style="list-style-type: none"> Non-technical information sharing and progress updates Announcements of key events, dates, and published documents related to the Project 	Any stakeholder group identified throughout the Project, including affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies
Project information brochures/leaflets regarding project characteristics	<ul style="list-style-type: none"> Sharing brief project information to provide regular updates Disseminating site-specific project information 	Any stakeholder group identified throughout the Project, including affected communities and PAPs, businesses, and organizations/agencies
Project information brochures/leaflets related to land acquisition	<ul style="list-style-type: none"> Information material sharing such as community leaflets, brochures, and posters during information disclosure and engagement activities/meetings. 	Any stakeholder group identified throughout the Project as being part of project-affected landowners/users including vulnerable groups, etc.
Online meeting (alternative tool if needed)	<ul style="list-style-type: none"> Information sharing on a specific topic to a group of people, including vulnerable groups Receiving comments, feedback, views, and perception regarding the Project from a certain group 	Any stakeholder group identified throughout the Project, including project-affected people, vulnerable groups, etc.

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

A summary of several stakeholder engagement activities undertaken by is explained below.

4.1 Internal Stakeholders

4.1.1 Internal Stakeholders

The Company aimed to shape the future of work together with its employees by addressing the new working principles in 7 basic dimensions defined from a holistic perspective with the "Adaptation to the Future of Work" studies initiated in 2020. These efforts were supported by workshops with broad participation at all levels, one-to-one interviews and surveys. In addition to updating the scope and implementation details of working models and support packages prepared according to different working models, 77 actions prioritized within the scope of Alignment with the Future of Work were implemented with the motto "#On the Road to the Future".

The following Stakeholder Communication Platform and Methods are used for employees İKON, mobile applications, intranet, employee engagement focus groups, team leaders' information meetings, CEO briefing meetings, management meetings, human resources meetings (happy hour), Trend Talks.

The objective is to:

- Attracting qualified talent,
- Broadening the knowledge and skills of employees, primarily blue-collar employees
 - Increasing employee loyalty
 - Investing in smart technologies
 - Increasing OHS investment

Annual employee engagement surveys are conducted to measure employee engagement and ensure that we provide the best working conditions. In 2022, the employee engagement scores of Enerjisa, Retail and Electricity distribution companies were 73%, 75% and 73%, respectively.

4.1.2 External Stakeholders

Customer management processes are carried out within the ISO 10002 Customer Satisfaction and Customer Complaints Management System framework. Regular training is provided on customer satisfaction to stakeholders in the dealer and authorized service network. All customer research is reviewed by the Voice of Customer team, which includes representatives from each unit. Improvements are determined, and assignments are made to the relevant departments using the obtained outputs.

Government agencies, regulatory bodies (EMRA, TEDAŞ) and local governments are the main stakeholders that directly affect the business. Regular visits to governors, district governors, municipalities and Mukhtars are conducted (local authority: officially elected neighbourhood representative) in the service regions. As a result of face-to-face interviews, information about the expectations of public institutions are obtained.

A direct communication mechanism has been established where Muhtars can contact the regional units and Customer Relations department through a dedicated Muhtar VIP Service Line (WhatsApp). In addition when mukhtars call 186, they have priority access and directly connected without any holding period. Through this mechanism, all feedbacks, request and grievances from mukhtars are recorded and processed at distribution company level.

Media is used as a tool to strengthen the relations with customers and community. All necessary information on operations spread through local and national media outlets such as newspapers, magazines, TV channels, etc. The Corporate Communication Department manages both verbal and written communication with media.

The following social programs are being undertaken as part of the external stakeholder engagement process

- Active engagement is being conducted in TÜSİAD's Environment and Climate Change Working Group and the Circular Economy Sub-Working Group.
- In 2022, Enerjisa became a member of ELDER's Environment Working Group, which was created to promote collective action and unity among electricity distribution companies for better environmental management.
- Active engagement as part of the Business Plastic Initiative, initiated by TÜSİAD, and collaborate with the Business Council for Sustainable Development Türkiye (SKD Türkiye).
- CEO acting as the Chairperson position of EUROGIA2020, a EUREKA Cluster focused on low carbon energy technologies. EUROGIA2020 is an industry and market-driven initiative, operating across the full energy value chain, from enhancing renewable energy and efficiency to lowering energy consumption and carbon emissions from fossil fuels.
- In 2022, the 18-month transformation of the Sustainable Energy Based Tourism Practice Centre-SENTRUM project was successfully completed in Ayvalık Küçükköy in cooperation with the United Nations Development Program (UNDP) and Sabancı

University. With Sentrum, the aim is to transform the chosen destination, promote sustainable tourism and support local economic development. The project will directly or indirectly contribute to 10 of the 17 the United Nations Sustainable Development Goals determined. More information about the project can be reached through its website ([Sustainable Energy Based Tourism Application Center | SENTRUM](#))

- ‘Enerjimi Koruyorum’ project has continued in the reporting period. A vital topic in the field of energy in Turkey is efficiency. As part of the project, Enerjisa volunteers, the Energetic Volunteers, train primary school students on energy efficiency and together with professional actors perform theatre plays. In 2022, on the 12th anniversary of the project, children's theatre ‘The Stars Not be Offended’ performances continued. With the events organized in Istanbul, Kocaeli, Kastamonu, Ankara, Mersin, and Adana, approximately 6 thousand children were reached and increased their awareness about Energy efficiency (www.enerjimikoruyorum.org).
- May the Stars Not be Offended storybook has been started as a home theatre with a finger puppet set and delivered it to more than 5 thousand children. Within the scope of the project, we aim to reach more than 10 thousand children in 14 provinces in total.
- With Science Virus platform (a social initiative) collaboration, the Energy Savers project was organized. During the project, energetic volunteers and 120 young volunteers who are university students, gave trainings in the primary schools with a box game about sustainability. Approximately 3,000 children between the ages of 7 and 10 increased their awareness about "Energy Saving", "Sustainability" and "Global Practicals’ through project volunteers.
- A mobile game was developed to reach children through an innovative channel. ‘Enerjimi Koruyorum’ mobile game enables children to build their own cities while they learn how to save energy and what to care about. More than 300 thousand children who had the opportunity to be aware of scarce energy sources played our mobile game.
- In the scope of Sabancı Mobilization, initiated under the leadership of Sabancı Holding running from October 29 to November 10, 4,934 volunteers (our employees and their families) (total 15,516 volunteering hours) participated volunteering activities such as waste collection, waste sorting workshop, Conifer Early Fire Detection system installation, Energy Savers project, ‘Enerjimi Koruyorum’ theater performance, 44th Istanbul.
- As Enerjisa, an increase awareness about the violence against Women was started. The company became one of the strategic partners of BADV-Business Against Domestic Violence Companies Network.
- Since 2010, company employees voluntarily give financial support Başkent EDAŞ Sports Club. Enerjisa aims to support young people between the ages 15-19 for their development in the field of education and sport and fulfil their potential.

5. GRIEVANCE MECHANISM

5.1 External Grievance Mechanism

Enerjisa has an external grievance mechanism in place as follows.

For Enerjisa Enerji:

In order to receive information about any issue related to the electricity retail activities, to submit a request, suggestion or complaint, the following mechanism exists:

- By personally visiting Enerjisa Customer Service Centers or Enerjisa Transaction Centers,
- By calling the Call Center at 444 4 372,
- By using the Appeal / Complaint Application channel at <https://online.enerjisa.com.tr/anasayfa/talepve-onerilerim> and www.enerjisa.com.tr,
- By direct e-mail to musteriiliskileri@enerjisa.com,
- Using the Enerjisa Mobile application,

For Distribution Companies:

- 186 call centre,
- Mobile 186 application,
- Social media accounts (Twitter, Instagram, Facebook),
- ‘Şikayetvar’ website
- The corporate websites
 - <https://www.baskentedas.com.tr/>
 - <https://www.ayedas.com.tr/>
 - <https://www.toroslaredas.com.tr/>
- E-mail,
- Government offices / Open door (Written grievances from public institutions),
- Petitions,
- Enerjisa Operation Centers,
- Whatsapp Customer and whatsapp mukhtars support line.
- Chatbox

5.2 Internal Grievance Mechanism

Enerjisa Code of Business Ethics, titled Enetik, sets a framework for employees to act with common values in all business processes. The code covers a broad range of topics, including human rights, environmental protection, anti-bribery and anti-corruption, compliance with legal regulations, fair competition, data privacy and confidentiality, media relations, engagement with public institutions and political organizations, conflicts of interest, gift giving and donations, working outside of the company, dress code, and health and safety. All employees are required to acknowledge and adhere to the Code of Conduct, while the Compliance Management Unit oversees compliance efforts.

The Ethics Committee is responsible for the implementation of the code and follow-up of the compliance process. Additionally, the Human Resources Department appoints Ethics Consultants to guide employees on compliance with the code. These consultants inform employees about issues that may violate business ethics and monitor the actions taken. They also support ethical monitoring activities carried out by the board members. 25% of the Board of Directors are women. The Chairman and the CEO positions are held by different people. The Internal Audit Committee, the Early Risk Detection Committee and the Corporate Governance Committee operate under the Board of Directors.

Internal Audit Department follows-up issues regarding the violation of work ethics. The consultants also follow the effectiveness of business ethics training and practices within the company.

All employees and other stakeholders of Enerjisa can report cases of non-compliance with the code of ethics to Enerjisa Enetik via various channels. Email: ENETİK@enerjisa.com, ethics notification form at www.enetik.enerjisa.com, by phone: +90 (312) 573 55 55, by fax: +90 (312) 573 55 55, or by mail: P.K. 2 06510 Emek/Ankara. They can also notify via the Sabancı Holding line. The head of the Internal Audit Department is the only person authorized to access notifications and is responsible for the security, confidentiality, and management of all notification channels. The Internal Audit Department, Ethics and Inspection Office independently and thoroughly examines Enetik notifications received via telephone, e-mail, fax, or mail. The results are reported to the senior management and to the Disciplinary Board when deemed necessary, and the Audit Committee is informed about the issue.

6. MONITORING AND REPORTING

6.1 Monitoring and evaluation activities

Engagement activity monitoring can be realized by identifying key performance indicators that reflect the objectives of the corporate SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase is presented below. SEP will include a timeline for engagement activities and defining responsible parties for implementing and monitoring engagement activities.

Table 7 Monitoring and Evaluation

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

This SEP will be periodically revised and updated annually during Project implementation. Monthly summaries of grievances will be prepared for the grievances raised by internal and external stakeholders, queries and related incidents, and the implementation status of corrective/preventive actions, consultations, and disclosure activities. Also, SEP monitoring and evaluation reports will be submitted to EBRD periodically. The Company will publicly

report on its environmental and social performance annually, including a summary of any grievances raised and how they have been resolved. To inform the external stakeholders Annual Environmental and Social Report (an overview of the Annual Environmental and Stakeholder engagement activities will be documented and filed to ensure accountable delivery of commitments made to stakeholders).

6.2 Reporting

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

CONTACT INFORMATION FOR THE PUBLIC

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Website: www.toroslaredas.com.tr

Email: musteriiliskileri@toroslaredas.com

Annex A. External Grievance Register and Closure Forms

GRIEVANCE & DEMAND REGISTER FORM

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

	<input type="checkbox"/> Debt to local suppliers or sub-contractors <input type="checkbox"/> Demanding any supports on education <input type="checkbox"/> Demanding any supports for households/individuals <input type="checkbox"/> Demanding any supports for settlement/community <input type="checkbox"/> Demanding any supports for local authorities
E- Actions Recommended	

GRIEVANCE & DEMAND CLOSURE FORM

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

