

Sis Enerji Uretim Ticaret A.S.

Ozmen – 3 Geothermal Power Plant

DOCUMENT: Stakeholder Engagement Plan and Grievance Redress Mechanism

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Definitions, Abbreviations & Acronyms

Definition, Abbreviation or Acronym	Description
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESS	World Bank Environmental and Social Standards
GRF	Grievance Registration Form
GRM	Grievance Redress Mechanism
IFC	International Financial Corporation
SEP	Stakeholder Engagement Plan
Sis Enerji	Sis Enerji Uretim Ticaret A.S.
TKYB	Development and Investment Bank of Turkey

EXECUTIVE SUMMARY

This Stakeholder Engagement Plan (SEP), for Sis Enerji A.S, has been developed to provide a continuous process of interaction with the Operational affected and other interested parties within the scope of the Construction Period Needs Financing of the Ozmen 3 GPP and Additional Wells (hereinafter referred to as "Investment") under operation. By undertaking the activities suggested in this SEP, Sis Enerji A.S. (hereinafter referred to as Sis Enerji) demonstrates its openness, responsiveness and willingness to engage in constructive dialogue with its stakeholders. Sis Enerji will be responsible for the implementation of the SEP.

Sis Enerji emphasizes the importance of close involvement of stakeholders through a process of informed consultation, participation and good faith negotiation throughout the operational lifecycle. To achieve this, the SEP is designed as a public document that is open to discussion with stakeholders and will be subject to regular revision to remain current and reflect the results of continued engagement..

The SEP consists of the following elements:

- Explanation of the objectives SEP;
- Brief description of the Project;
- Overview of applicable standards of stakeholder engagement, including requirements of the national legislation and international standards;
- Summary of previous stakeholder engagement activities undertaken by the Project to date;
- Identification of Project stakeholders and their categorization;
- Description of methods for future engagement;
- Roles and responsibilities for effective implementation of the SEP;
- Public Grievance Mechanism enabling the lodging and addressing of complaints and feedback from external stakeholders; and
- Means of monitoring and reporting

Sis Enerji invites the stakeholders to take part in ensuring that this SEP functions as a live interactive document and welcomes feedback on the proposed process of engagement.

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1.INTRODUCTION

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of the Project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a variety of external stakeholders over the entire life of the Project. Initiating the engagement process in early phases helps ensure the timely public access to all relevant information and gives the stakeholders an opportunity to input into the Project design and the assessment of impacts.

The SEP will promote two-way communication between the Sis Enerji and different stakeholders continuously. Information regarding the project, environmental and social risks and impacts, proposed mitigation measures, grievance redress mechanism, will be shared with project stakeholders on a regular basis.

The report will include the identification of the Activity's stakeholders and will be updated with the identification of stakeholder engagement activities. Stakeholder engagement is an active process is decisive in that it is periodically updated and integrated into the Environmental and Social Management Plan.

1.1. Company Description

Sis Enerji Inc. ("Project Company") has undertaken to operate the 19 MW capacity Ozmen - 3 Geothermal Power Plant in Manisa Province Alaşehir District. The project is planned to contribute to the national grid with an annual electricity production of 166.44 GWh. The Project Company has obtained a geothermal resource operation license for a period of 30 years as of January 2013 for an area of 2,385.08 hectares where potentially 25 wells have been identified. Geothermal resource exploration drillings named Ozmen-7 (Ö-7) and Ozmen-11 (Ö-11) are planned by Sis Enerji in the access area 3191221 and license number 2013/01 located within the borders of Tepeköy District. It has been stated that there is no need to apply the provisions of the EIA Regulation within the scope of the "EIA Not Required" decision for these wells located within the relevant license area.

Investment Need Financing was required for the construction period (Project) of the Ozmen 3 GPP and Additional Wells under operation. Thus, the development of the project will be ensured.

The region where the project area is located remains within the "Agricultural Area" in accordance with the Spatial Plans Construction Regulation. This situation confirms the above-mentioned information provided during the project site visit.

1.2. Objectives of Stakeholder Engagement Plan (SEP)

The main goal of the Stakeholder Engagement Plan is to ensure that all relevant stakeholders (individuals, groups and organizations) affected by and/or interested in the Project are engaged in project activities and information flow with these stakeholders is continuous throughout the project life. Stakeholder engagement is a key activity for such projects; because it enables stakeholders to have information at all stages of the project, to express their expectations and concerns, and to establish an open communication channel with stakeholders in the activities carried out by the investor. The objectives of the SEP are generally as follows:

- Identification of stakeholders indirectly or directly affected by and/or interested in the project
- Defining and planning stakeholder engagement activities that will commence during project preparation and planning and continue in the construction and operation stages of the project
- Determining the frequency of consultation activities, information sharing and level of participation as well as to defining the content of consultation activities
- Establishment of the Grievance Redress Mechanism, which will create an open communication channel for stakeholders at each stage of the project

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Ensuring that concerns and expectations expressed by stakeholders are addressed in the decision-making and planning stages of the project.

SEP has been prepared to meet the requirements specified in national legislation as well as IFC, World Bank Environmental Social Standards and TKYB's Social Standards.

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2. INTERNATIONAL STANDARDS

Sis Enerji plans to finance the Ozmen 3 GPP project with a TKYB loan and is committed to implementing an Environmental and Social Action Plan (ESAP) in line with national and international standards and best practices. Therefore, the Activity will be carried out in accordance with the requirements of the IFC Performance Standards and the World Bank Environmental Social Standards. These standards are briefly defined below.

IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

It emphasizes the importance of managing environmental and social performance throughout the Activity. An effective Environmental and Social Management System is a dynamic and ongoing process implemented and supported by company management and includes the involvement of customers, employees, the local community directly affected by the Activity (Affected Communities) and, if any, other stakeholders. Stakeholder engagement is essential to establish the strong, constructive and responsive relationships necessary to successfully manage the environmental and social impacts of an activity. Stakeholder engagement is a continuous process. Stakeholder engagement, in varying degrees, consists of analyzing and planning stakeholders, informing stakeholders, providing consultation and participation, establishing a grievance mechanism, and providing ongoing reporting to Affected Communities. While the form, frequency and level of effort of stakeholder engagement vary considerably, it should be appropriate for the risk and negative impacts of the activity and the stage of development.

Clients should identify stakeholder groups that may be interested in their activities and consider initiating a dialogue with stakeholders through external communications. If the Activity has certain physical features, sizes and/or facilities that are expected to have adverse environmental and social impacts on Affected Communities, the client will identify Affected Communities and meet the following requirements. The Client will prepare and implement a Stakeholder Engagement Plan appropriate to the characteristics and interests of Affected Communities, taking into account the risk, impacts and stage of development of the activity. Where appropriate, the Stakeholder Engagement Plan will include different measures to ensure the effective participation of those identified as disadvantaged or vulnerable. Where the engagement process relies heavily on community representatives, the client will use reasonable efforts to verify that they truly represent the views of the Affected Communities and are credible to accurately communicate the results of their consultation to members of the community they represent.

Sharing information related to the Activity helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the Activity. Affected Communities: (i) the purpose, nature and scale of the activity, the duration of the proposed Activity activities, (iii) the risks it poses to those communities, potential impacts and related mitigation measures, (iv) the envisaged stakeholder engagement process, and (v) the grievance mechanism will provide access to information.

When Affected Communities are exposed to risks and adverse impacts identified in the Activity, the client will undertake a consultation process that enables Affected Communities to express their views on the risks, impacts and mitigation measures of the Activity, with the client considering and responding to these views. The extent and extent of participation required for the consultation process should be commensurate with the risks of the activity, its adverse impacts and the concerns raised by Affected Communities. An effective consultation process should: (i) be carried out early in the environmental and social risk and impact identification process and continue as risks and impacts occur, (ii) in a culturally appropriate local language or languages and in a format that Affected Communities can understand, based on previous exchanges and in a transparent, objective, should be based on meaningful, easily accessible information, (iii) inclusive participation should focus on those directly affected rather than indirectly affected, (iv) be free of external manipulation, interference, coercion, and intimidation, (v) enable meaningful participation, where appropriate, and (vi) record should be taken. The client will conduct the consultation process based on the

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preferred languages of the Affected Communities, their decision-making processes and the needs of disadvantaged or vulnerable groups. If the client is already running such a process, he or she must adequately demonstrate such participation.

When activities have potential significant impacts on Affected Communities, the client will engage in an Informed Consultation and Engagement process that builds on the steps in the consultation process above. This enables Affected Communities to participate in the process on an informed basis. In the Informed Consultation and Participation process, the parties share their views and knowledge in depth and consult each other in an organized manner. Thus, the client considers their views expressed on issues that directly affect the Affected Communities, such as proposed mitigation measures, sharing development assistance and opportunities, implementation of the action, in the decision-making process. The consultation process should seek to learn about (i) the views of both men and women, through separate forums or participation, if necessary, and (ii) men's and women's different concerns and priorities regarding impact, mitigation mechanisms and benefits, if any. The client will record the process, in particular measures to prevent or mitigate risks and adverse impacts on Affected Communities, and inform affected persons how their concerns have been taken into account.

IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement

It has been prepared with the thought that the land purchases and restrictions on land use associated with the project may have negative effects on the communities and people using these lands. Physical displacement (relocation and loss of shelter) and economic displacement (loss of income or other livelihoods due to loss of assets or access to assets) of people as a result of forced resettlement, project-related land purchases and/or land use restrictions) stands for. Resettlement is deemed to have taken place without their consent where the affected communities have no right to oppose land acquisitions or restrictions on land use resulting in the physical or economic displacement of affected persons or communities. Forced resettlement occurs when (i) a land is legally expropriated or a temporary or permanent restriction is placed on land use, and (ii) the land purchaser can resort to expropriation and restriction of land use if an agreement cannot be reached with the seller of the land.

When forced resettlement is not managed properly, it can cause long-term distress and impoverishment to the Affected Community and persons, as well as environmental damage and adverse socioeconomic impacts in their new resettlement. Therefore, forced resettlement should be avoided. However, if it is not possible to avoid forced resettlement, it should be reduced to a minimum. Measures to mitigate negative impacts on IDPs and host communities should be carefully planned and implemented. In general, the state is an important third party in most cases, as the main role is played by the land acquisition and resettlement process, including the determination of compensation. Experience has shown that when customers are directly involved in the resettlement process, the process is more cost-effective, efficient and timely, and innovative approaches are implemented to improve the livelihoods of those affected by the resettlement.

To avoid expropriation and eliminate the need to apply to the government for resettlement, customers are encouraged to settle in accordance with the terms set forth in this Performance Standard, even if they have the right to purchase the land without the seller's consent.

Summary of Stakeholder Engagement Requirements in World Bank Environmental and Social Standards

ESS1 requires the Borrower to continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project. For *High Risk and Substantial Risk* projects, the Borrower will provide to the Bank and disclose documentation, as agreed with the Bank, relating to the environmental and social risks and impacts of the project prior to project appraisal. The documentation will address, in an adequate manner, the key risks and impacts of the project, and will provide sufficient detail to inform stakeholder engagement and Bank decision making.

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If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated.

As required by ESS2, Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits. A grievance mechanism will be provided for all direct workers and contracted workers¹⁶ (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

According to **ESS4**, the Borrower will document its emergency preparedness and response activities, resources, and responsibilities, and will disclose appropriate information, as well as any subsequent material changes thereto, to affected communities, relevant government agencies, or other relevant parties. The Borrower will assist and collaborate with affected communities, relevant government agencies and other relevant parties in their preparations to respond effectively to an emergency event, especially where their participation and collaboration will be an important part of an effective response.

The objectives of **ESS8 Cultural Heritage** also include requirements related with stakeholder engagement such as promoting meaningful consultation with stakeholders regarding cultural heritage. The Borrowers are required to identify stakeholders that are relevant for the cultural heritage that is known to exist or is likely to be encountered during the project life cycle. Stakeholders will include, as relevant:

- (a) project affected parties, including individuals and communities within the country who use or have used the cultural heritage within living memory; and
- (b) other interested parties, which may include national or local regulatory authorities that are entrusted with the protection of cultural heritage and nongovernmental organizations and cultural heritage experts, including national and international cultural heritage organizations.

Where the Borrower's project site contains cultural heritage or prevents access to previously accessible cultural heritage sites, the Borrower will, based on consultations with users of the site, allow continued access to the cultural site, or will provide an alternative access route, subject to overriding health, safety and security considerations.

World Bank Environmental and Social Standard 5 (ESS5): Land Acquisition, Land Use Restrictions and Involuntary Resettlement; recognizes that project-related land expropriation and restrictions on land use may have adverse impacts on communities and individuals. Project-related land expropriation or land use restrictions may result in physical displacement (relocation, loss of residential land or shelter), economic displacement (loss of land, assets or access to assets, resulting in loss of income or other livelihoods), or both. it could be. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land expropriation or restrictions on land use resulting in displacement. This standard emphasizes that forced resettlement should be avoided. If unavoidable, measures should be taken to reduce negative impacts on IDPs.

World Bank Environmental and Social Standard 10 (ESS10)

This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

ESS requires borrowers to engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of

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stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. According to ESS10, Borrowers shall engage in meaningful consultations with all stakeholders, provide them with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The process of stakeholder engagement will involve the following, (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

As set out in detail in the ESS10, the Borrower is required to maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

The Borrower shall identify the different stakeholders, both project-affected parties and other interested parties. Individuals or groups that are affected or likely to be affected by the project will be identified as 'project affected parties' and other individuals or groups that may have an interest in the project will be identified as 'other interested parties'.

The Borrower shall also identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable. Based on this identification, the Borrower shall further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail shall be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.

In consultation with the Bank, the Borrower is required to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP shall be disclosed as early as possible, and before project appraisal, and the Borrower shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower shall disclose the updated SEP.

As detailed in ESS10, the Borrower is required to respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower shall propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.

The grievance mechanism shall be proportionate to the potential risks and impacts of the project and shall be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism shall utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

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2.SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Sis Enerji A.S. ("Sis Enerji"), one of the leading companies in the sector in Turkey, under Ozmen Holding, Sis Enerji has been continuing its activities in Manisa Province Alaşehir District since 2016. Sis Enerji is close to Tepeköy, Baklacı and Işıklar neighborhoods and other geothermal power generation facilities.

The loan requested will be used for the construction period investment requirements of the Ozmen 3 GPP and Additional Wells under operation. Necessary permissions were obtained for additional wells.

Sis Enerji attaches great importance to maintaining a sustainable dialogue with its stakeholders. Activity evaluations and reports are made on a regular basis. The local people near the project area are in constant consultation and they are informed about the project activities. A stakeholder engagement plan was prepared for Sis Enerji Ozmen 3 GPP in February 2021 with the 2U1K consultant firm and disclosed to the public. In this plan, information was given about stakeholder analysis studies, stakeholder engagement methods and grievance mechanism. This prepared plan does not cover Covid-19 measures, a grievance mechanism for internal and external stakeholders, and additional wells under construction. For this reason, a new stakeholder engagement plan has been prepared that includes Covid-19 measures, a grievance mechanism for internal and external stakeholders, and additional wells under construction.

Sis Enerji addresses its stakeholders under the following main headings.

- with those who directly contribute/influence the business cycle
- Those who have a periodic/activity-based/direct/indirect contribution/effect on the business cycle. According to this designed approach, the stakeholders in the first group are the 'main' stakeholders; those in the second group are defined as 'other' stakeholders.

In the stakeholder analysis study, company-stakeholder priorities were determined by using quantitative and qualitative perspectives together. The consultation methods carried out with each stakeholder are given in the table below.

Table 0-1 Stakeholder Engagement Activities of Sis Enerji

Employees	Technical meetings, department meetings, executive meetings, (Whatsapp) groups established in instant messaging and calling or communication applications established to communicate with management, employees and subcontractors Sharing meeting with employees
Customers	Since sales are made through the EPIAŞ system, there is no direct customer communication.
Suppliers	Bilateral meetings
Shareholders and Lenders	Activities such as Board of Directors meetings, periodic reports, website and social media channels, domestic and international Creditor relations meetings
Public institutions and society	Reporting obligations stipulated in laws and regulations, other information flows, bilateral meetings, community contribution Activities, interaction with the people of Tepeköy and Baklacı, where the campus is located.
Universities	Faaliyet çalışmaları Activity studies
Sectoral unions and organizations	General assemblies and periodic meetings, periodical information activities, contribution to strategy development and lobbying, other meetings
Group companies	Group senior management meetings, regular briefing activities, contribution to strategy development processes, bilateral meetings
Media	Corporate communication activities

Employees at Sis Enerji Ozmen 3 GPPs are divided into blue-collar and white-collar employees. There are 21 employees in total in the field. Of these, 5 employees are white-collar and 16 employees are blue-collar. Along with the additional wells, the Drilling Works will be carried out in two shifts per day, with 14 people in one shift, over a period of 60 days for approximately each drilling. The maximum number of employees will be up to 21 people for a total of 5 days in a shift.

For the fluid pipeline production, 20 people will work in a single shift, and it can reach 30 people during the busy period.

It carries out its consultation activities with its employees on many different platforms. These platforms are; It includes many channels such as face-to-face meetings/meetings, instant messaging and calling or communication application (Whatsapp), complaint/request forms.

Sis Enerji Ozmen 3 GPP workers are not members of a union. Therefore, there is no official worker representative. However, there is an employee representing the blue-collar workers at the facility and acts as a bridge between the workers and the management. It is stated that the HR policy is valid for all employees and that workers are informed about all the rights they have. At the time of employment, the employee is told about all the rights he/she has. Workers usually verbalize their complaints to the authorized person. All employees are also aware of the announcements and notifications made on the bulletin boards, and they also use the complaint boxes to freely express their requests, complaints and opinions whenever they want. "Near-miss forms" are generally used when a complaint on OHS is to be submitted. The project company has established a registration system for complaints, requests and suggestions from internal and external stakeholders. Within the project company, there is an officer from the consultation activities with the Stakeholders, who ensures that the complaints, requests and suggestions are recorded and resolved. Internal stakeholders, namely employees, can convey their complaints, requests and suggestions to the relevant person face to face or via telephone, as well as a complaint box within the facility. It has not prepared an appropriate grievance management plan that explains the methods and steps to be followed in the event of a grievance. Based on the stakeholder engagement plan prepared in February 2021, a complaint management plan for internal and external stakeholders should be prepared by the project company and all stakeholders should be informed about this issue.

As it is known, the development and implementation of alternative methods for stakeholder consultations has gained importance during the Covid-19 pandemic process in the world, and credit institutions such as IFC have prepared guide documents on the ways to be followed in this process. During the pandemic process, the Customer has taken a series of measures to ensure the health and safety of its employees, and these measures have been regularly shared with the staff. Acting with this awareness, the Company evaluated the reality of the pandemic from the perspectives of sustainability and OHS and implemented many measures focused on minimizing the risk of contamination among employees. Among these measures; includes in-house protective measures. All employees are informed by the company about the importance, current situation and precautions of Covid-19. In addition to awareness raising and perception development activities, online trainings and technical support were also provided. Among these studies; workplace measures, measures to protect personnel, environment cleaning, disinfection and ventilation, remote technical support, remote technical training are included.

Sis Enerji is in direct and continuous consultation with the settlements close to the activity area in the stakeholder engagement activities it has carried out so far. External stakeholders can submit their complaints face-to-face or via telephone, as well as write their complaints, requests and suggestions in the complaint and request log book located in the security booth at the entrance of the facility. When the company's complaint records are examined, a total of 3 complaints were received from external stakeholders in 2021 and 2022. Two complaints were closed in a timely manner by taking corrective measures and the complainant was informed. The other complaint was evaluated by the company and was not taken into action due to being unfounded.

Apart from the meetings Sis Enerji held with its stakeholders, the summary of the meetings with the affected and relevant stakeholders is given in the table below.

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Tablo 0-2 Stakeholder Interviews and Details

Date	Interview Form	Stakeholders	Information Given to the Stakeholder	Questions and Comments Received from Stakeholders	Response to Stakeholders
12-13.04.2022	Sis Enerji Plant Visit	Sis Enerji Administrative and Social Affairs Officers	• Evaluation of risks and opportunities • Whether there is a stakeholder engagement plan and grievance mechanism • Giving information about the meetings with the stakeholders • Obtaining information about stakeholders • How the grievance mechanism of businesses works • Working and working conditions • Non-discrimination and equal opportunity standard • Pension standard • Grievance mechanism standard • Child Labor and Forced Labor Standard • Land acquisition and economic/physical displacement • Information on their subject was shared, and their opinions and suggestions were received.	It was asked how these plans, prepared in line with these questions specifically for the facility, will be implemented and how they will contribute. In addition, in this plan prepared by us, information has been given about the management of this process and how it will be recorded and monitored in the upcoming processes.	It has been explained that determining the affected and relevant stakeholders within the scope of the activity, how the stakeholders will be involved in this activity, how to consult with them, the necessity of establishing and announcing the complaint resolution mechanism by creating an open communication channel to the stakeholders, and that the opinions and suggestions of the stakeholders are important in shaping the activity.

25.03.2022	Face-to-Face Interview	Tepeköy District Headman Baklaci District Headman	• Socio-economic structure of the neighborhood • What Sis Enerji Ozmen knows and thinks about the construction phase of the 3 GPP and Additional Wells under operation • How is their relationship with Sis Enerji? • Employment issue • How they are positively or negatively affected by the activities of Sis Enerji as a stakeholder. • Whether there are impacts on public health and safety • How they proceed in case of any complaints arising from the activity • Information on their subjects was shared and their opinions and suggestions were received.	Although the interviewed neighborhood headmen do not know the full effects of the GPP project on the vineyards, they stated that the yield has decreased compared to their production before the establishment of the facility. But they don't just attribute it to the activity in question. They think that changing climatic conditions and the existence of other energy facilities in the environment are also effective. Tepeköy Neighborhood Headman stated that as the negative effects of the Project, when drilling the irrigation well, it was necessary to go deeper and the quality of the water deteriorated. Expressing that there were no complaints about public health and safety, he stated that his relations with the operating company were good. They stated that they contacted the person responsible for stakeholder meetings directly via telephone in case of any complaints, requests or suggestions arising from the activity. Baklaci Neighborhood Headman	For this report, which was prepared for the activities of the stakeholders within the scope of the activity, it was explained that this meeting was held because Tepeköy and Baklaci neighborhoods are the closest settlements within the scope of the additional wells, as they are the affected stakeholders. Sis Enerji officials were told that a healthier answer could be obtained by expressing their demands on the positive and negative effects of GPPs on viticulture, the odor problem and the effects of additional wells. In case of new employment opportunities, it was informed that the business owners will evaluate the recruitment in case of applications. Finally, brief information about the grievance mechanism is given.
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				stated that they were below the project area and that they were not adversely affected by the said activity. Baklacı Neighborhood Headman also stated that there were no complaints about public health and safety, and stated that they have good relations with the operating company. They stated that they contacted the person responsible for stakeholder meetings directly via telephone in case of any complaints, requests or suggestions arising from the activity. After the mukhtar expressed his views, why this meeting was held, What are the positive and negative effects of GPPs on viticulture, How to minimize the odor problem, What will be the effects of the additional wells, And if there are new employment opportunities, is priority given to local job seekers? He posed his questions.	
25.03.2022	Face-to-Face Interview	Household interviews in Tepeköy and	- Socio-economic structure of the households - What Sis Enerji Ozmen knows and thinks about the	The interviewed households do not favor the drilling of additional wells due to the large number of GPPs For this report, which was prepared for the activities of the stakeholders within the scope of the activity, it was	

		Baklacı neighborhoods	construction phase of the 3 GPP and Additional Wells under operation • How is their relationship with Sis Enerji? • Employment issue • How they are positively or negatively affected by the activities of Sis Enerji as a stakeholder. • Whether there are impacts on public health and safety • How they proceed in case of any complaints arising from the activity • Information on their subjects was shared and their opinions and suggestions were received. • Information on their subjects was shared and their opinions and suggestions were received.	operating in their regions. All of the interviewed households earn their living from viticulture. Although there is no scientific study with geothermal, it has been stated that the yield of the products has decreased and there has been a decrease. It was stated that there was an odor problem and that the irrigation well had to be drilled deeper and the quality of the water deteriorated. It was stated that there were no complaints about public health and safety. It was stated that in case of any complaint, the neighborhood headman was first contacted. After the households expressed their views, why this interview was held, What are the positive and negative effects of GPPs on viticulture, How to minimize the odor problem, What will be the effects of the additional wells, in the form of questions.	explained that this meeting was held because Tepeköy and Baklacı neighborhoods are the closest settlements within the scope of the additional wells, as they are the affected stakeholders. Sis Enerji officials were told that a healthier answer could be obtained by expressing their demands on the positive and negative effects of GPPs on viticulture, the odor problem and the effects of additional wells. Finally, brief information about the grievance mechanism is given.
25.03.2022	Face-to-Face Interview	Tepeköy Agricultural Credit Cooperative No. 1065	• What Sis Enerji Ozmen knows and thinks about the construction phase of the 3 GPP and Additional Wells under	Sis Enerji Ozmen stated that they know it as a facility operating in 3 GPP regions.	For this report, which was prepared for the activities of the stakeholders within the scope of the activity, it was explained that this meeting was held as

			operation - How is their relationship with Sis Enerji? - Employment issue - How they are positively or negatively affected by the activities of Sis Enerji as a stakeholder. - Whether there are impacts on public health and safety - How they proceed in case of any complaints arising from the activity - Information on their subjects was shared and their opinions and suggestions were received.	They stated that they were not affected positively or negatively by their activities. After expressing their views, why this meeting was held, What will be the effects of the additional wells, in the form of questions.	the relevant stakeholder of the project within the scope of additional wells. The relevant stakeholder was told about the effects of the additional wells, and Sis Enerji officials were told that a healthier answer could be obtained by expressing their demands on these issues. Finally, brief information about the grievance mechanism is given.
25.03.2022	Face-to-Face Interview	S.S. Tepeköy Tradesmen and Craftsmen Credit and Bail Cooperative	- What Sis Enerji Ozmen knows and thinks about the construction phase of the 3 GPP and Additional Wells under operation - How is their relationship with Sis Enerji? - Employment issue - How they are positively or negatively affected by the activities of Sis Enerji as a stakeholder.	Sis Enerji Ozmen stated that they know it as a facility operating in 3 GPP regions. They stated that they were not affected positively or negatively by their activities. After expressing their views, why this meeting was held, What will be the effects of the additional wells, in the form of questions.	For this report, which was prepared for the activities of the stakeholders within the scope of the activity, it was explained that this meeting was held as the relevant stakeholder of the project within the scope of additional wells. The relevant stakeholder was told about the effects of the additional wells, and Sis Enerji officials were told that a healthier answer could be obtained by expressing their demands on these issues.

		• Whether there are impacts on public health and safety • How they proceed in case of any complaints arising from the activity • Information on their subjects was shared and their opinions and suggestions were received.	Finally, brief information about the grievance mechanism is given.
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** During the interviews, the photos of the stakeholders interviewed within the scope of the Personal Data Protection Law could not be taken.*

3. STAKEHOLDERS IDENTIFICATION AND ANALYSIS

In order to realize stakeholder participation in an equal and fair way, stakeholders should be identified at the first stage of the activity. Thanks to this determination, it will be ensured that an effective SEP will be established that will enable all stakeholders of the activity to be accurately analyzed, including people and groups who are directly or indirectly affected by the activity, who are interested / interested in the activity.

Stakeholder Identification is an important step in managing the overall stakeholder engagement process. It reduces the risk of a narrow stakeholder group dominating the consultation process. The main stakeholders with direct contribution/influence on the business cycle and other stakeholders who have a periodic/activity-based/in case of need direct/indirect contribution/effect on the business cycle. Based on this definition, other stakeholders that may be relevant have also been identified and listed below;

- National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Ministry of Health, Provincial Directorate of Environment, Urbanization and Climate Change, T.R. Alışehir District Governorship, Alışehir Municipality, etc.)
- Settlements close to the activity area (Tepeköy and Baklacı neighborhoods)
- Customers, suppliers
- Group company (Ozmen Holding)
- Shareholders and Lenders
- Universities, sectoral unions and organizations (JESDER, JED, İTO)
- Employees
- Media

3.1. Affected Parties

This includes individuals and groups that are expected to be directly or indirectly affected by the activity in terms of living standards and livelihoods/income sources. It is expected that those living in settlements close to the Activity area (Tepeköy and Baklacı neighborhoods) will be affected by the Activity activities. Because the said loan will be provided for the development of the project and will be used for the drilling of additional wells, and with this financing, new wells will be opened and drilling activities will be in question. The stakeholder group that may be directly affected by the Activity are the owners of vineyards close to additional wells, employees of the Activity and contractors. Employees of the Activity and contractors are considered as affected parties, since their working conditions depend on the procedures and principles of the Activity determined by the employers.

3.2. Other Interested Parties

Other persons or communities related to the activity are defined as "other interested parties". National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Ministry of Health, Provincial Directorate of Environment, Urbanization and Climate Change, T.R. Alışehir District Governorship, Alışehir Municipality, etc.) related groups suppliers, shareholders and creditors are considered as other interested parties to the Activity.

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3.3. Stakeholder Matrix

In order to ensure equal and fair stakeholder participation, stakeholders should be identified at the first stage of the activity. It is also important to determine which consultation strategy (directly or indirectly) will be implemented for each affected group. Table 3-1, summarizes these details regarding the consultation and disclosure process.

Table 3-1 Stakeholder Matrix

Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method
National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Ministry of Health, Provincial Directorate of Environment, Urbanization and Climate Change, T.R. Alagehir District Governorship, Alagehir Municipality, etc.)	Interested Party	• Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Consultation meetings • Activity Brochures • Grievance Mechanism • Reporting obligations stipulated in laws and regulations
Customers	Affected Party	• Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Consultation meetings • Grievance Mechanism
Suppliers	Affected Party	• Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Consultation meetings • Grievance Mechanism
Shareholders and Lenders	Interested Party	• Current developments related to the activity • Stakeholder Engagement Plan	• Consultation meetings • periodic reports, • Website and social media channels
Tepeköy and Baklacı neighborhoods	Affected Party	• Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Consultation meetings • Activity Brochures • Grievance Mechanism • Brochures and posters to be hung in public places (cafe, headman's building, town hall, etc.)
Employees	Affected Party	• Grievance Mechanism Procedure for company and contractor employees	• Occupational safety meetings

		• Current developments related to the activity • Code of Conduct for Employees	• Brochures and posters to be hung in work areas • Grievance Mechanism and online communication platforms • Consultation meetings • Satisfaction surveys
Universities, sectoral unions and organizations (JESDER, JED, İTO)	Interested Party	Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Consultation meetings • Periodic information activities
Media	Interested Party	• Non-technical summary of the activity and Stakeholder Engagement Plan • Current developments related to the activity • Grievance Mechanism Procedure	• Corporate communication activities

4. STAKEHOLDER ENGAGEMENT PROGRAMME AND METHODS

Stakeholder engagement is an ongoing process that began before the development of this SEP and will continue throughout the life of the Activity. Sis Enerji will be in active communication with identified stakeholders throughout the life of the activity. If there are significant changes in the Activity resulting in additional risks and impacts, particularly where they will affect the parties affected by the Activity, Sis Enerji will provide information on these risks and impacts and consult with the parties affected by the Activity on how to mitigate these risks and impacts.

To the extent possible, Sis Enerji will refrain from sending and distributing printed material until the end of the pandemic. According to the requirements of IFC, World Bank Environmental Social Standards and TKYB's Social Standards, Sis Enerji will carry out consultation activities by implementing the Covid-19 pandemic measures.

The following methods and materials will be used within the scope of stakeholder engagement from the development stage of the activity to the end of the operation period.

Consultation Meetings: Regular consultation meetings will be held with the stakeholders affected by the activity, at least every six months, information will be given about the current activities and the questions and opinions of the stakeholders will be evaluated. Information on current developments in the activity will be provided and feedback will be received and recorded about the satisfaction of stakeholders.

Satisfaction Surveys: The satisfaction surveys to be applied to the employees and customers of the Company will aim to receive feedback on the Company's activities and products, and to evaluate these feedbacks and to ensure that necessary actions are taken.

Activity Brochure: In the activity brochures, which will be presented to the stakeholders at the first stage, general information about the Activity, the complaint mechanism and communication channels will be given.

Grievance Mechanism: The Grievance Mechanism will be open to all stakeholders throughout the duration of the activity and will include recording grievances, taking action for resolution and closing grievances by providing necessary information. Information on GRM communication channels will also be given to nearby settlements (especially in public places, coffee houses, Muhtars' offices, etc.) in the first phase of the activity and will be updated when necessary.

Corporate Website: The corporate website provides announcements, Activity documents, reports and contact information for further information requests.

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5. ROLES AND RESPONSIBILITIES FOR STAKEHOLDER ENGAGEMENT IMPLEMENTATION

5.1. Implementation Arrangements

Sis Enerji will be the main responsible for carrying out the stakeholder engagement activities specified in this Plan. Collection of complaints, questions and feedback will be the direct responsibility of Sis Enerji team. The detailed roles and responsibilities of the team for the social management of the activity are given in the table below.

Table 5-1 Roles and Responsibilities for Social Management

Relevant Personnel/Unit	Roles
Administrative Affairs Supervisor	- Coordinates and monitors the team for the proper implementation of processes related to grievance mechanism and stakeholder engagement. - Coordinates with the parties for the proper implementation of processes related to grievance mechanism and stakeholder engagement. - Identifies incidents or problems arising from operational activities and ensures that appropriate corrective actions are developed or referred to the management team as needed
Human Resources Unit	- Takes action to resolve operational complaints in coordination with other Operating units. - Keeps records of complaints and participation activities. - Implementation of satisfaction surveys to the employees and customers of the activity, analyzing the results and reporting them regularly
Finance Specialist	- Producing all work in accordance with quality, safety, budget and timing requirements and company procedures and contract terms - Ensuring successful submission of all identified documents; - Managing consultation meetings and other related activities; - To follow the information activities carried out within the scope of SEP; - Ensuring that Lenders' Operating standards are met and meeting with audit teams and answering their questions as needed

6. MONITORING AND REPORTING

Sis Enerji will record and report the feedback it receives from communities, local governments, other companies, the Media, academic institutions and other relevant groups on a systematic basis through an effective consultation and Grievance Mechanism. A summary of the follow-up and management of the complaints will be submitted to the Bank with the semi-annual monitoring reports to be prepared by Sis Enerji.

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7. GRIEVANCE REDRESS MECHANISM

Sis Enerji Ozmen has established a registration system for complaints, requests and suggestions from internal and external stakeholders within 3 GPPs. Within the project company, there is an officer from the consultation activities with the Stakeholders, who ensures that the complaints, requests and suggestions are recorded and resolved. Internal stakeholders, namely employees, can convey their complaints, requests and suggestions to the relevant person face to face or via telephone, as well as a complaint box within the facility. It has not prepared an appropriate grievance management plan that explains the methods and steps to be followed in the event of a grievance. In line with the stakeholder engagement plan prepared in February 2021, a complaint management plan for internal and external stakeholders should be prepared by the project company and all stakeholders should be informed about this.

Workers usually verbalize their complaints to the authorized person. All employees are also aware of the announcements and notifications made on the bulletin boards, and they also use the complaint boxes to freely express their requests, complaints and opinions whenever they want. "Near-miss forms" are generally used when a complaint on OHS is to be submitted.

Sis Enerji will further develop the complaint resolution mechanism it has carried out on many different platforms to date, and a grievance record system will be used to document all employee complaints, corrective actions and results. All Complaints will be recorded in this system which will be used to record, monitor, report and evaluate all Complaints including third parties, employees and contract workers and their responses. In addition, Sis Enerji will inform all its stakeholders about the grievance mechanism channels and provide contact information.

- Ways to be used by stakeholders to formally voice their grievances are as follows:
- Telephone line: (Stakeholders can call Sis Enerji Call Center directly - +90 (216) 309 75 50)
- Face-to-face: (Stakeholders can convey their complaints face-to-face to the relevant personnel at the Sis Enerji Ozmen 3 GPP facility.)
- Grievance Registration Form: (They can fill out the Grievance registration forms which will be available at the facility entrance and other public areas accessible to stakeholders.)
- Web page contact form: (<http://sisenerji.com/contact.html> They can fill out the contact form on the website.)
- The steps to be followed during the grievance management will be as follows;

7.1. Receiving & Registering of Grievance

- All complaints received by the personnel of the relevant company through the telephone line, contact form or other channels are recorded using the Grievance Registration Form (GRF) and a hard copy of the form is given to the Complainant. The completed form is entered into the Sis Enerji complaint registration system within the same Business Day.
- If the GRF cannot be filled, the following basic information is recorded:
 - Complainant's first and last name (complainants also have the right to register an anonymous complaint);
 - Subject of the complaint; o Complaints Place;
 - Contact information (phone / mobile number, address, e-mail, etc.);
 - Organization name (if relevant)
 - Date and time

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- Sis Enerji Team completes the GRF according to the information provided and records the Complaint.
- All corrective actions suggested by the complainant are recorded through the GRF.

7.2. Assessment of the Grievance

- All Complaints are reviewed to be classified according to whether they are genuine or not related to company activities. If the issues/disputes raised are not related to the company's activities, guidance is provided to the Complainant to contact the relevant person. Eligible Complaints will be answered in accordance with the company's social and environmental standards.
- All Complaints received over the phone line, e-mail, face-to-face meetings / communications are recorded and Sis Enerji Team contacts the Complaint owner to explain the Activity response process within two (2) Business Days after registration.
- Sis Enerji has ten (10) Business Days to investigate and respond to Complaints. If the situation requires a more complex investigation, the Complainant will be provided with updated information describing the necessary actions and possible timeline for resolving the Grievance.

7.3. Resolving the Grievance

- Necessary corrective actions will satisfy the complainant.
- All parties agree on corrective actions during the resolution process.
- Sis Enerji aims to resolve each complaint within thirty (30) Business Days after responding, and this period may be extended with the written instruction of the General Manager.
- Complainants have the right to apply to the relevant official authorities when they are not satisfied with the decision of Sis Enerji and / or the Contractors regarding their complaints.

7.4. Close out of the Grievance

Evidence of the corrective actions taken (photographs or other evidence documents on the Site, pertaining to the subject) is collected and a "Complaint closure form" is prepared between Sis Enerji and the Complainant.

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APPENDICES

APPENDIX-1 GRIEVANCE REGISTER FORM

APPENDIX-2 COMPLAINT CLOSURE FORM

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APPENDIX-1**Sis Enerji A.S.****ŞİKÂYET KAYIT FORMU / COMPLAINT REGISTER FORM**

Şikayetin Alındığı Yer / Location Of Complaints Received		Tarih / Date
Alan Yetkilinin Adı / Name Of Person In Charge		Şikayet Kayıt No / Complaint Register Number
Şikayete Konu Alanın Koordinatları / Coordinates Of The Area Subject To Complaint		
ŞİKÂYET SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO		
Şikâyet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. / The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond.		
Ad Soyad / Name Surname		Şikâyetin Geliş Yolu / Form of Complaint:
TC Kimlik No / Identification Number		Telefon- Ücretsiz hat / Phone –Free phone line ☐
Telefon/ E-Posta Telephone/ E-mail		İstişareToplantısı / Consultation meeting ☐
Mahalle-Köy-İlçe-İl / Neighborhood-Village –District - Province		Dilekçe / Petition ☐
ŞİKÂYET DETAYLARI / DETAILS OF COMPLAINT		
Şikâyet Konusu / Complaint		
Şikâyet sahibi tarafından talep edilen çözüm / Solution requested by the Complainant		
Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası / Şikâyet Sahibinin Ad Soyad ve İmzası / Name Surname and Signature of the Registerer Name Surname and Signature of Complainant		

APPENDIX-2

Sis Enerji A.S.

ŞİKÂYET KAPATMA FORMU / COMPLAINT CLOSURE FORM

Complaint Closing Number:	
Define Emergency Actions to be Taken:	
Identify Long-Term Actions to Be Taken (If Necessary):	
Is There a Claim for Compensation?	Yes ☐ No ☐
CONTROL AND DECISION OF CORRECTIVE ACTION	
Stages of Corrective Action	Date of Expiration of the Given Period and Authorized Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	